



EUROPEAN COMMISSION
DG JOINT RESEARCH CENTRE
Directorate B – Growth and Innovation
Circular Economy and Industrial Leadership

European IPPC Bureau

Seville, 29/06/2021

**CONSULTATION ON THE FIRST DRAFT (D1) OF THE REVISED
BEST AVAILABLE TECHNIQUES REFERENCE DOCUMENT
FOR THE SLAUGHTERHOUSES, ANIMAL BY-PRODUCTS
AND EDIBLE-CO PRODUCTS INDUSTRIES (SA)**

Dear SA TWG Members,

The European IPPC Bureau (EIPPCB) is pleased to inform you that the **first draft (D1)** of the **Best Available Techniques Reference Document (BREF) for the Slaughterhouses, Animal By-products and Edible Co-products Industries (SA)** is now available for comments.

Issuing this first draft is a major milestone in the process of reviewing the BREF. We would like to take this opportunity to thank all TWG members who contributed to the drawing up of this first draft by sending information and/or draft text proposals to the EIPPCB, by participating in the data collection exercise at plant level, by organising site visits or by participating in TWG meetings.

We would like to ask you to read this first draft very carefully and to submit your comments in the way described in the attachment to this letter. The BREF Guidance¹ sets a standard 2-month period for consultation, which may be extended to 3 months when the consultation is foreseen over the summer or year-end holidays.

The firm deadline for receiving comments on this first draft is therefore:

15 October 2021

You can download the first draft (D1) of the SA BREF from BATIS. A PDF version of the document has been placed in the following BATIS folder:

[BATIS> Forum> Slaughterhouses and Animal By-products Industries> 02 First SA BREF review 2018-> 10 Draft 1](#)

If you intend to circulate the document within or outside your organisation, please attach this letter, which is also posted in the aforementioned BATIS folder.

¹ [Commission Implementing Decision 2012/119/EU](#)

Overview of the information exchange for the drawing up of D1

This first draft is the result of the information exchange that has been conducted since the kick-off meeting held on 25-28 June 2019 in Seville. Since the beginning of the process, the EIPPCB has frequently updated TWG members on the progress of the BREF via regular emails. All the communications to the TWG are available in the following BATIS folder:

[BATIS > Forum > Slaughterhouses and Animal By-products Industries > 02 First SA BREF review 2018-00 > Messages to the TWG](#)

The main steps of the information exchange are summarised in the paragraphs below.

- The data and information collection was carried out via plant-specific questionnaires. The first draft questionnaire was circulated on 19 September 2019 and a commenting period was opened until 18 October 2019. A second draft of the questionnaire was then issued on 12 November 2019, followed by another commenting period until 22 November 2019 and a dedicated workshop that was held on 26-27 November 2019 in Seville. A third draft questionnaire template was released on 16 December 2019, followed by a commenting period until 17 January 2020 and a testing phase by volunteer operators. The final questionnaire template was released on 28 January 2020 together with a user manual. In parallel to the questionnaire development, a list of participating plants was prepared using information from Member States (information provided on a voluntary basis) and for transparency purposes it can be found in Annex 9.2 to Draft 1.
- The plant-specific data collection using the questionnaire template developed was carried out from 28 January to 30 June 2020 (the initial deadline was 30 April 2020, but several filled-in questionnaires were submitted with some delays due to the COVID-19 pandemic). By that date, 207 filled-in questionnaires were provided. It should be noted that it was agreed within the TWG that the filled-in questionnaires would not contain any confidential data.
- After 30 June 2020, the EIPPCB extracted and analysed the information submitted via the questionnaires, checked its quality and on 29 July 2020 provided the TWG with a background report on the data collected. The purposes of the background report were:
 - to enable TWG members to check the overall quality of the collected data;
 - to explain how the data collected were compiled and how a first set of graphs and tables on emissions and consumption were prepared;
 - by showing data from individual installations in the context of the whole data set, to allow TWG members to double-check the correctness of the data, in particular of the reported emission levels in relation to the techniques applied by the participating installations, in advance of data assessment workshop.
- Data from the filled-in questionnaires were extracted using an Excel Macro and compiled into a general data file. The general data file was loaded onto the Qlik Sense application to create different data visualisation sets. Additional Qlik data cleaning operations were implemented to render the format of the data reported adequate.
- A workshop on data assessment took place virtually (due to the COVID-19 pandemic) on 28-29 September 2020, with the purpose of:
 - reaching a common understanding of the data that had been collected within the TWG (for instance in terms of potential correlation between the processes carried out at the plant and emissions to air and water, or consumption of water and energy);
 - allowing TWG members to double-check the completeness and correctness of the data collected (e.g. whether data were complete, correctly extracted and presented, etc.);

-
- collecting opinions on what information needed to be taken into account for the data analysis and the graphs to be plotted with a view to drawing up D1.

The workshop was also the opportunity for the TWG to discuss the quality and the representativeness of the data, to share its analysis of specific issues based on the data available on BATIS, and to report any matter of importance concerning the data collection, processing and analysis.

- Both before and after the workshop on data assessment, and based on the TWG discussions, the EIPPCB invited the TWG to make suggestions/comments on how to assess and/or present the data (especially using the Qlik application). Moreover, the Member States were invited to make corrections/updates to the questionnaires and to post the updated versions of the questionnaires onto BATIS on two occasions. The EIPPCB consequently updated the plant-specific data collection and the Qlik Sense application on 24 November 2020 (99 updated questionnaires) and 10 February 2021 (48 updated questionnaires).
- Two site visits were carried out in 2019 and 2020:
 - France (20-24 January 2019): visits to two rendering installations, and three slaughterhouses (a chicken, a pig and a cattle slaughterhouse);
 - Germany (25-28 February 2020): visits to a turkey slaughterhouse, a rendering installation, a fat melting installation and a bone degreasing and demineralising installation.

Another site visit was scheduled for 17-18 March 2020 to Belgium and the Netherlands, but it was cancelled due to the COVID-19 pandemic.

Format and content of the BREF

The structure of D1 follows the decisions taken at the kick-off meeting, where the TWG generally welcomed the structure of the BREF as proposed by the EIPPCB in the Background Paper and put forward a number of suggestions to improve it. The structure of D1 is as follows:

- Chapter 1 provides general information on the SA sector in Europe and its key environmental issues (KEIs).
- Chapter 2 provides information and data on generally applied processes and techniques, emission levels, techniques to consider for the determination of BAT across the SA sector. As much as possible, information on general issues is included in this chapter to avoid repetitions.
- Chapter 3 provides information and data on applied processes and techniques, emission and consumption levels, techniques to consider for the determination of BAT for slaughterhouses. The chapter includes a general section and sections referring to specific animal species (cattle, pigs, chickens).
- Chapter 4 provides information and data on applied processes and techniques, emission and consumption levels, techniques to consider for the determination of BAT for installations processing animal by-products and/or edible co-products. The chapter includes a general section and sections referring to specific installations, i.e. rendering of animal by-products and/or edible co-products (rendering, fat melting, blood and feather processing), fishmeal and fish oil production, gelatine manufacturing.
- Chapter 5 presents the proposed BAT conclusions. These include associated emission levels, and other associated environmental performance levels, as stipulated in the BREF Guidance.
- Chapter 6 presents information on ‘emerging techniques’.
- Chapter 7 will be drafted at a later stage and will include the concluding remarks and recommendations for future work.

-
- Annex I gives general information about the data collection process, as well as the list of plants that took part in the data collection via questionnaire.
 - Annex II gives examples of various processes' flowcharts from installations that participated in the data collection.

The main focus of D1 is on the proposed BAT conclusions (Chapter 5) and embedding a solid and sound basis for their derivation in the body of the BREF (Chapters 2-4).

The previous version of the SA BREF has undergone several modifications regarding the following aspects:

- The BREF structure has been reorganised to ensure a more sectorial approach.
- As much as possible, information on widely applied techniques has been presented in Chapter 2, to avoid repetition throughout the BREF.
- The document has been drafted in line with the BREF Guidance, which introduced changes to the format and contents, notably the description of BAT candidates according to a standardised 10-heading structure.

Cross-references to other relevant reference documents (in particular, the Food, Drink and Milk (FDM) BREF, the Industrial Cooling Systems (ICS) BREF, the Energy Efficiency (ENE) BREF, the Monitoring of Emissions to Air and Water from IED Installations (ROM) REF) have been introduced throughout the document where appropriate. Internal cross-references have also been introduced to facilitate navigation within the document.

In the body of the draft, you will find a number of placeholders or messages that will not appear in the final version of the BREF. These consist of comments for the attention of the TWG, which are **highlighted in yellow**, indicating missing information that the TWG is invited to collect and upload in BATIS during the commenting period.

Results of the data collection

The compilation of collected data is available as an Excel file (03. General data file June 2021) in the following BATIS folder:

[Forum > Slaughterhouses and Animal By-products Industries > 02 First SA BREF review 2018-> 08 Data extraction](#)

The TWG has been granted access to the analytical tool (i.e. Qlik Sense) used by the SA BREF team for the drawing-up of D1. The Qlik Sense application is accessible to all TWG members, after registration with the SA BREF team, via the following link:

https://datam.jrc.ec.europa.eu/datam/mashup/SA_BREF_TWG

The EIPPCB has drafted remarks on the data assessment accompanying D1. For each of the proposed BAT-AE(P)Ls proposed in D1, this document indicates how to select data in Qlik, i.e. the sheet and the filters applied to select the data deemed relevant for the proposed BAT-AE(P)L. This document is available in the following BATIS folder:

[BATIS> Forum> Slaughterhouses and Animal By-products Industries> 02 First SA BREF review 2018-> 10 Draft 1](#)

Odour emissions

During the kick-off meeting, the TWG decided:

- to include channelled odour emissions as a KEI for SA installations;
- to decide at a later stage whether BAT-AELs for channelled odour emissions to air should be derived, based on the availability and comparability of the data collected through the questionnaires.

In this respect, BAT-AELs have been proposed for odour concentration (ou_E/Nm^3) for installations processing animal by-products and/or edible co-products (see BAT 25). Moreover, additional BAT-AELs have been proposed for TVOC, NH_3 and H_2S , in line with the kick-off meeting conclusions and because a correlation between these parameters and odour concentration was not found.

Combustion processes

During the kick-off meeting, the TWG decided to include channelled emissions of dust, SO_x and NO_x as KEIs for:

- the combustion of meat-and-bone meal and animal fat;
- the burning of malodorous gases including non-condensable gases (e.g. in thermal oxidisers or steam boilers) in SA installations.

The EIPPCB has not proposed in D1 BAT-AELs for the above processes in relation to channelled emissions of dust, SO_x and NO_x , since they fall within the scope of the Directive on the limitation of emissions of certain pollutants into the air from medium combustion plants².

Objective of the consultation on D1

The main objective of this consultation is to invite TWG members to **peer-review and validate** the information included in the document, **as well as to fill important gaps** by submitting relevant additional data and information. The aim of this is to establish a sound and definitive basis for the final TWG meeting where decisions will be taken on BAT and BAT-AE(P)Ls for the SA sector.

With this in mind, we would like to ask you to focus your attention on major issues such as:

- the proposed **BAT conclusions and associated environmental performance levels** (Chapter 5 of D1);
- the techniques to consider in the determination of BAT in Chapters 2-4, which form the basis of the proposed BAT conclusions.

To be fully useable, any comment should be accompanied by a relevant rationale, supporting information and a proposal. It is strongly advised to avoid comments such as *'This is not enough'*, *'This number is not relevant'* or *'This value should be changed'* as the lack of sound rationales and alternative proposals generally prevents those comments being taken on board.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L2193>

Please note that, in principle, this draft will be the only formal draft published before the final plenary TWG meeting.

How to make comments on D1

Comments on the first draft (D1) of the SA BREF should be made using the BATIS Online Reviewer Tool. Instructions on how to make comments on BATIS are attached to this letter.

Please note that new commenting features to manage ‘shadow groups’ have been introduced in BATIS, making it easier for shadow working groups to comment.

We strongly recommend submitting your comments online and using the BATIS tool for managing shadow groups. Indeed, this offers a series of advantages for you as well as for the EIPPCB:

- For comments that are submitted online, there is no ambiguity as to which exact part of the text a given comment refers to.
- The EIPPCB is not required to perform the laborious process of importing comments from Excel to BATIS, therefore avoiding potential misinterpretations and allowing a faster publication of the full set of TWG comments.
- The shadow group tool facilitates the work of TWG members who have to collect, assemble and validate comments from several shadow group members.

Experience from the past shows that comments provided offline via Excel sheets are often in an incorrect format. As a consequence, time-consuming manual corrections by the EIPPCB of thousands of comments were sometimes necessary. As the online commenting functionality of BATIS is now considered mature and as a tool for managing shadow groups is now also available, the EIPPCB reserves the right to return Excel templates that are incorrectly filled in, or, if necessary, to ultimately reject such incorrect templates.

We would also like to suggest that you introduce your comments as soon as they are ready and not to wait until the very last moment to do so. Experience in the past has shown that BATIS can become overloaded and slow when the system is heavily used.

When submitting comments from or on behalf of different sources, please make sure that only consolidated comments and proposals are uploaded (avoid contradictory comments and/or proposals).

In case you have doubts or questions on the format of the comments you want to make, please do not hesitate to contact the EIPPCB at JRC-B5-EIPPCB@ec.europa.eu or Tel. +34 954 488 284.

Next steps after commenting on D1


The information and comments provided by the TWG will be used to revise the current draft (D1) of the SA BREF. As of today, we expect that a final TWG meeting could be held towards mid-2022. However, the exact planning will depend on the number and the complexity of the comments and the additional information received.

For further information on the typical workflow for the drawing-up and reviewing of BREFs, please consult the BREF Guidance.

Should you have any questions on this letter or on the process steps following this first draft, please do not hesitate to contact the SA BREF team, using the following e-mail address: JRC-B5-EIPPCB-SA@ec.europa.eu.

Again, we would like to thank all of those who are contributing to the drawing-up of the SA BREF. We look forward to hearing from you soon and receiving your comments on the structure and content of this draft BREF.

Yours sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a horizontal line and a small dash.

Serge Roudier
Head of the
European IPPC Bureau

Attachments:

- Instructions on how to make comments on BATIS for TWG members
- Instructions on how to make comments on BATIS for shadow groups