



European IPPC Bureau

How to comment on a draft BREF using BATIS

Instructions for shadow group members

Joint
Research
Centre

How to comment on a draft BREF using BATIS

1 – Introduction

2 – Online commenting by shadow group members

Introduction (1/7)

General aspects (1/2)

- Comments on draft BREFs can be introduced in BATIS until the deadline.
- During the commenting period, comments can at all times be reviewed, modified, and deleted. After the deadline, comments can no longer be modified.
- TWG members can create their own groups of experts in BATIS (i.e. shadow groups) to collectively introduce comments.
- TWG members can designate delegates to co-manage shadow groups.

Introduction (2/7)

General aspects (2/2)

- During the commenting period, TWG members and delegates can only access their own comments as well as the comments introduced by the members of their shadow group(s). Similarly, shadow group members can only access comments of the shadow group of which they are members.
- TWG members and/or their delegates have the final responsibility for submitting comments of their shadow groups.
- Comments only become visible to the whole TWG when published by the EIPPCB (some time after the end of the commenting period).

Introduction (3/7)

Online commenting through BATIS

Comments on formal draft BREFs shall be submitted online, due to the following advantages:

- For comments that are submitted online, there is no ambiguity as to which exact part of the BREF text a comment refers.
- 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.

Introduction (4/7)

Tips for introducing pertinent comments (1/2)

- Introduce one comment per issue (e.g. when commenting on a whole chapter/section/paragraph).
- Use the pdf version of the BREF in parallel to find the page numbers.
- Select the appropriate relevance of the comment:
 - major comments include those that have a bearing on the BAT conclusions, or on the scope or structure of the BREF;
 - minor comments include typos and those that have no bearing on the BAT conclusions.

Introduction (5/7)

Tips for introducing pertinent comments (2/2)

- For each comment, provide a sound rationale.
- For each comment, provide a clear proposal for a concrete modification of the text in the BREF (i.e. under 'Suggested Actions').
- Upload information supporting the comment (e.g. reports, results of monitoring), preferably into the respective folder of the BATIS forum and mention it in the comment (i.e. name of the file and of the folder in BATIS).

Introduction (6/7)

Example A of a pertinent comment

Refers to: BAT-AEL for COD emissions to water: 30–240 mg/l as yearly average

Comment: The upper end of the BAT-AEL range for COD emissions to water is too low in the case of installations with a high COD concentration in the influent (e.g. plants producing pharmaceuticals).

Rationale: Installation #120 from the data collection reports yearly average COD values of > 6000 mg/l in the influent to and of 290 mg/l in the effluent from the waste water treatment plant. Advanced waste water treatment techniques are used (i.e. a membrane bioreactor) that are well operated, as can be seen from the low TSS and BOD5 emission values in the effluent as well as an overall COD removal efficiency of more than 95%.

Suggested actions: Increase the upper end of the BAT-AEL range to 300 mg/l provided that a COD abatement efficiency of more than 95% is achieved.

Introduction (7/7)

Example B of a pertinent comment

Refers to: Technique 'recycling of process streams'.

Comment: While the technique is commonly used in the sector, not all process streams can be recycled.

Rationale: Contaminated process streams cannot be recycled to other parts of the process where clean process water is needed.

Suggested actions: Add to the description: 'The degree of recycling is limited by the purity requirements of the recipient stream'.

How to comment on a draft BREF using BATIS

1 – Introduction

2 – Online commenting by shadow group members

Online commenting by shadow group members (1/13)


Step 1: Go to the BATIS webpage:
<http://eippcb.jrc.ec.europa.eu/batis/>.


Step 2: Insert your username and password and click on 'Log in'.

Note: The access of shadow group members to BATIS is only possible during the commenting period.

Note: TWG members who wish to share their comments with their shadow group should log in with their username for the shadow group.

Online commenting by shadow group members (2/13)

Legal notice | Cookies | Contact |  Print | **Magnus Carlsen** (Shadow Group member) | **Log out**

 **JOINT RESEARCH CENTRE**

BATIS - Best Available Techniques Information System Tuesday, 2 April 2019 11:45 AM

European Commission > EU Science Hub > BATIS > [Home](#)

Overview **Shadow Group**


Overview - Ferrous Metals Processing Industry (FMP) - Open for comments

- Short Title: **Ferrous Metals Processing Industry**
- Full Name: **Reference Document on Best Available Techniques for the Ferrous Metals Processing Industry**
- Description: **Review of FMP BREF**
- Kick-off meeting minutes:
- Latest Release: **1 (D1) - Open for comments** (Deadline for comments)

Production Status

→ Work started →  **Formal draft** → Final draft → Published

Latest Documents

Status	Release	Creation Date	HTML
Formal draft	1	29/03/2019	

Step 3: To comment on a draft BREF, click on the icon to access the html version.

Online commenting by shadow group members (3/13)

The screenshot shows a web interface for online commenting. At the top, there is a 'Section' dropdown menu currently set to '.. Main Document ..'. To its right are navigation buttons: 'PREVIOUS', 'NEXT', and 'BACK'. Further right are 'Add comment' and 'Exit' buttons. A red box highlights the 'Section' dropdown menu, and a red line points from it to a text box on the left. A blue box highlights the 'PREVIOUS', 'NEXT', and 'BACK' buttons, and a blue line points from it to a text box on the right. The main content area displays the title '(AT) Reference Metals Processing' and the subtitle 'Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control)'. Below this, it identifies the 'JOINT RESEARCH CENTRE', 'Directorate B – Growth, Industry and Innovation', and the 'European IPPC Bureau'. It also states 'DRAFT 1 (March 2019)'. At the bottom left, it says 'Colour code used:'.

Step 4: The draft BREF in html format (also called online reviewer version) opens in a new window. From the drop-down menu, choose the BREF section you wish to comment on.

Note: You may also use the buttons 'Previous', 'Next' and 'Back' to browse through the BREF sections.

Online commenting by shadow group members (4/13)

Section 9.1.8.4 Emissions to air from hot dipping

PREVIOUS | NEXT | BACK

Step 5: Select the concrete part of the text you wish to comment on.
If you do not select a concrete part of the text, your comment will refer to the whole section/chapter/document that you have previously selected.

to use both of the techniques (a) and (b), together with one of the techniques (c) or (d), and in combination with one of the techniques (e) or (f) given below.

	Technique	Description
<i>Reduction of generation of emissions</i>		
a	Smoke-reducing fluxing agent	Ammonium chloride in fluxing agents is partly substituted with other alkali chlorides (e.g. potassium chloride) to reduce smoke formation.
b	Minimisation of carry-over of the fluxing solution	The carry-over of the fluxing solution to the hot dipping bath is minimised by allowing enough time for the fluxing solution to drip off, and/or by drying.
<i>Collection of emissions</i>		
c	Air extraction as close as possible to the source	Air from the kettles is extracted, for example using lateral hood or lip extraction, or the kettles are located in enclosed areas equipped with roof or wall extraction.
d	Closed kettles combined with air extraction	Hot dipping is carried out in closed kettles and air is extracted.
<i>Waste gas treatment</i>		
e	Wet scrubbing	See Section 9.7.2.
f	Fabric filter	See Section 9.7.2.

Step 6: Click on 'Add Comment'.

Table 9.16: BAT-associated emission level (BAT-AEL) for channelled dust emissions to air from hot dipping in hot dip coating of wires and in batch galvanising

Online commenting by shadow group members (5/13)

Step 7: A new window opens, the comment window.

Comment made by
Magnus Carlsen

Commented text
Closed kettles combined with air extraction

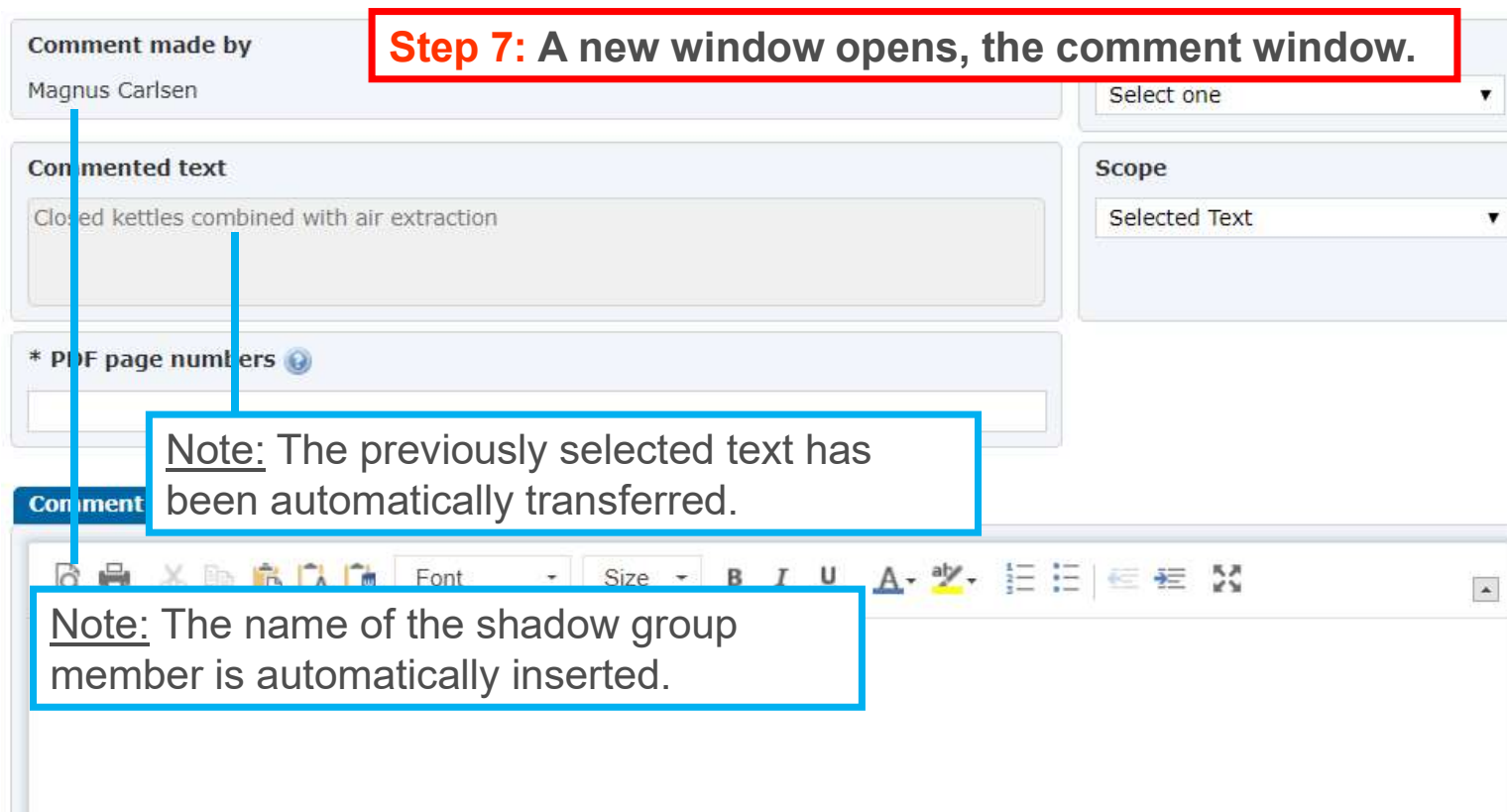
* PDF page numbers ⓘ

Scope
Selected Text

Comment

Note: The previously selected text has been automatically transferred.

Note: The name of the shadow group member is automatically inserted.



Online commenting by shadow group members (6/13)

The screenshot shows a web form for online commenting. Red circles and lines highlight specific fields: 'Major' in the Relevance dropdown, '748' in the PDF page numbers field, the 'Comment' tab, and the text 'The technique is not used in the batch galvanising sector.' in the comment text area.

Comment made by
Magnus Carlsen

* Relevance
Major

Commented text
Closed kettles combined with air extraction

Scope
Selected Text

* PDF page numbers ⓘ
748

Comment ⓘ Rationale ⓘ Suggested Actions ⓘ Attachments ⓘ

The technique is not used in the batch galvanising sector.

Step 9: Fill in the requested information, namely on:

- relevance of the comment;
- page number in the pdf version of the BREF where the text can be found;
- comment;
- rationale;
- suggested actions.

Online commenting by shadow group members (7/13)

Note: You may get help by clicking on the (?) icons.

Note: By default, your comment refers to the selected text. You may change this so that the comment refers to the entire paragraph/section/document.

Note: Documents supporting your comment may be uploaded under 'Attachments'. It is useful to mention the uploaded documents under 'Rationale'. The document(s) uploaded under 'Attachments' will become visible to the whole TWG after the commenting period.

Step 9: Click 'Add comment' to save the comment.

The screenshot shows a web form for online commenting. At the top, there is a 'Comment made by' field. Below it is a large text area for the comment. To the right of the text area are two dropdown menus: '* Relevance' (set to 'Major') and 'Scope' (set to 'Selected Text'). Below these is a field for '* PDF page numbers' with the value '748'. A horizontal tab bar contains 'Comment' (selected), 'Rationale', 'Suggested Actions', and 'Attachments'. Below the tabs is a rich text editor with a toolbar and the text 'The technique is not used in the batch galvanising sector.' At the bottom right, there are 'Close' and 'Add Comment' buttons. A red line points from the 'Add Comment' button to the 'Step 9' instruction box. Blue lines point from the '?' icons in the 'Comment made by' and 'PDF page numbers' fields to the first note. A blue line points from the 'Scope' dropdown to the second note. A blue line points from the 'Attachments' tab to the third note.

Online commenting by shadow group members (8/13)

Step 10: BATIS switches back to the html version of the BREF.
The submitted comments appear in a table above the BREF text.

Pos. ▲	No.	S. g. member	Relev.	Scope	Selected Text	Comment	Actions
1	7	Magnus Carlsen	Major	Selected Text	Closed kettles combined with air extraction	The technique is not used in the batch galvanising sector.	⚙️ ▼

9.1.8.4 Emissions to air from hot dipping

BAT 24. In order to reduce emissions to air of dust and together with one of the techniques (c) or (d), and in combination with one of the techniques (a) and (b),

Technique	Description
Reduction of generation of emissions	Fluxing agents is partly substituted with other alkali chlorides (e.g. potassium chloride) to reduce smoke formation. Fluxing solution to the hot dipping bath is minimised by allowing enough time for the fluxing solution to drip off, and/or by
	ected, for example using lateral hood or lip extraction, or the kettles are located in enclosed areas equipped with roof or
	closed kettles and air is extracted.

Waste gas treatment

e	Wet scrubbing	See Section 9.7.2.
f	Fabric filter	

Table 9.16: BAT-assessment

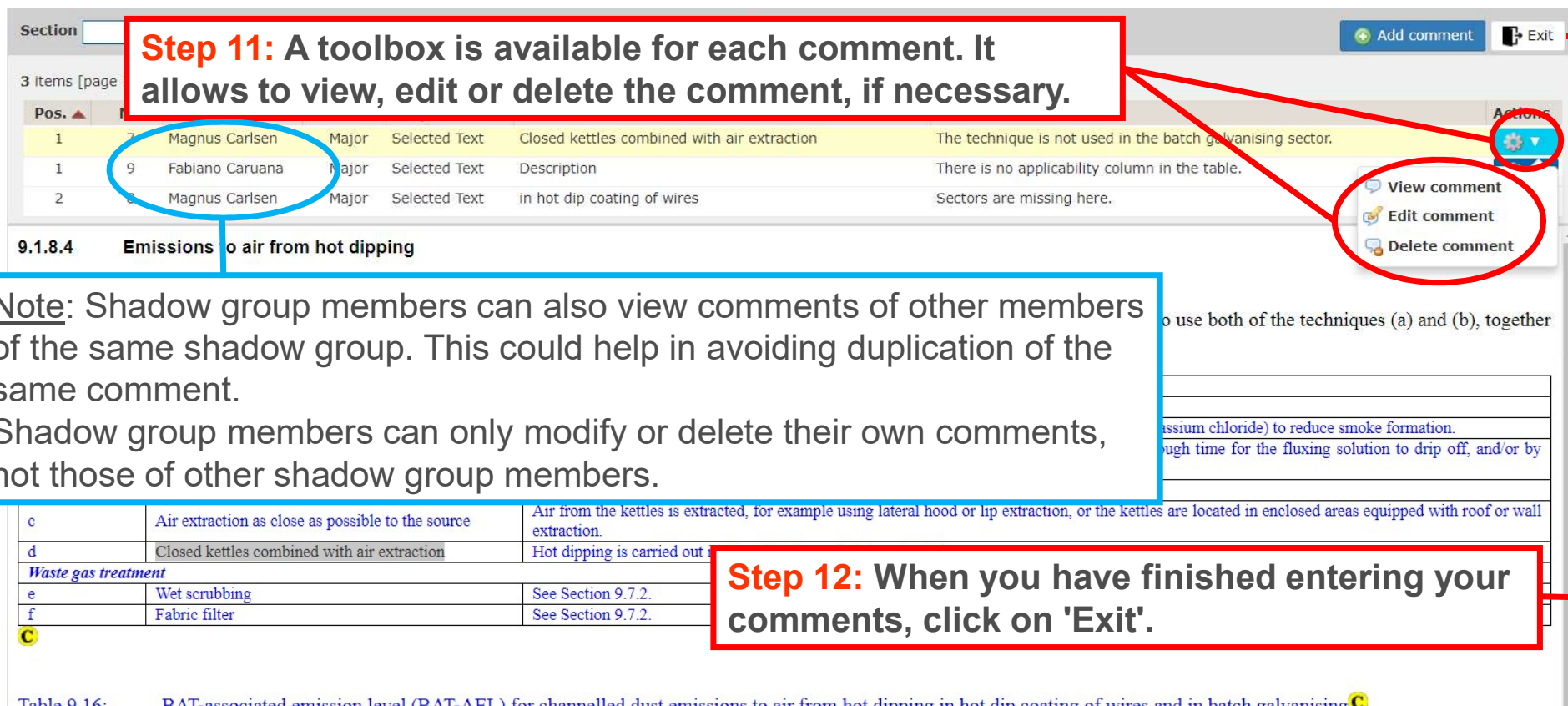
Note: If you click on a comment in the table, the browser will jump to the part of the text to which the comment refers and highlight it.

Note: By clicking on the column headings, you may sort the comments in the selected section, e.g. in their order of appearance.

Note: Parts of the BREF text that are subject to a comment are marked with a © icon. If you hover the cursor over the icon, a list of the commenters and the comment numbers appears. If you click on the icon, the table of comments will only show the comments related to this part of the text.

Online commenting by shadow group members (9/13)

Step 11: A toolbox is available for each comment. It allows to view, edit or delete the comment, if necessary.



The screenshot shows a table with 3 items. The first item is highlighted in yellow. The toolbox for this comment is visible on the right, containing 'View comment', 'Edit comment', and 'Delete comment' options. The 'Exit' button is also visible in the top right corner.

Note: Shadow group members can also view comments of other members of the same shadow group. This could help in avoiding duplication of the same comment. Shadow group members can only modify or delete their own comments, not those of other shadow group members.

Step 12: When you have finished entering your comments, click on 'Exit'.

Pos.	Name	Role	Comment Type	Description	Comment
1	Magnus Carlsen	Major	Selected Text	Closed kettles combined with air extraction	The technique is not used in the batch galvanising sector.
1	Fabiano Caruana	Major	Selected Text	Description	There is no applicability column in the table.
2	Magnus Carlsen	Major	Selected Text	in hot dip coating of wires	Sectors are missing here.

9.1.8.4 Emissions to air from hot dipping

to use both of the techniques (a) and (b), together

assium chloride) to reduce smoke formation.

ough time for the fluxing solution to drip off, and/or by

c	Air extraction as close as possible to the source	Air from the kettles is extracted, for example using lateral hood or lip extraction, or the kettles are located in enclosed areas equipped with roof or wall extraction.
d	Closed kettles combined with air extraction	Hot dipping is carried out
Waste gas treatment		
e	Wet scrubbing	See Section 9.7.2.
f	Fabric filter	See Section 9.7.2.

Table 9.16: BAT-associated emission level (BAT-AEL) for channelled dust emissions to air from hot dipping in hot dip coating of wires and in batch galvanising

Online commenting by shadow group members (10/13)

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- Description: **Review of FMP BREF**
- Kick-off meeting minutes:
- Latest Release: **1 (D1) - Open for comments** (Deadline for comments: **07/06/2019 23:59:59**)

Production Status

→ Work started → **Formal draft** → Final draft → Published

Latest Documents

Status	Release	Creation Date	HTML
Formal draft	1	29/03/2019	

Online commenting by shadow group members (11/13)

Step 14: BATIS switches to the 'Shadow group' tab where you can find a table with the comments of your shadow group. By default, the comments are sorted in their order of appearance in the document.

Note: You may use different filters when displaying the list of comments.

Note: You may export the comments to an Excel file or print them.

Overview **Shadow Group**

Comments by Shadow Group members

BREF Ferrous Metals Processing Industry

Release 1

Shadow Group Batch galvanising shadow group of Cyprus

Owner Hikaru Nakamura

Deadline viernes, 7 junio 2019 23:59:59 CEST

Member All members **Section** All Sections **Date** ≥ **Filter**

3 items [page 1 of 1] items per page

No	Member	Relevance	Comment	Section	Scope	Actions
7	Magnus Carlsen	Major	The technique is not used in the batch galvanising sector	9.1.8.4 Emissions to air from hot dipping	Selected Text	
9	Fabiano Caruana	Major	There is no applicability column in the table.	9.1.8.4 Emissions to air from hot dipping	Selected Text	
8	M...		Emissions to air from hot dipping	Emissions to air from hot dipping	Selected Text	

Export all **Print all**

Note: By clicking on the column headings, you may sort the comments, e.g. by relevance.

Online commenting by shadow group members (12/13)

Step 15: You may view or edit a comment by clicking on the comment number or by using the toolbox. By clicking on 'Highlight comment in context', you may return to the html version of the BREF (for example, if you wish to delete one of your comments).

Overview **Shadow Group**

Comments by Shadow Group members

BREF Ferrous Metals Processing Industry
Release 1
Shadow Group Batch galvanising shadow group of Cyprus
Owner Hikaru Nakamura
Deadline viernes, 7 junio 2019 23:59:59 CEST

Member All members **Section** All Sections **Date** ≥ **Filter**

3 items [page 1 of 1] 100 items per page **Export all** **Print all**

#	Member	Relevance	Comment	Section	Scope	Actions
7	Magnus Carlsen	Major	The technique is not used in the batch galvanising sector.	9.1.8.4 Emissions to air from hot dipping	Selected Text	
9	Fabiano Caruana	Major	There is no applicability column in the table.	9.1.8.4 Emissions to air from hot dipping		View or Edit comment
8	Magnus Carlsen	Major	Sectors are missing here.	9.1.8.4 Emissions to air from hot dipping		Highlight comment in context

Note: Shadow group members can only modify or delete their own comments, not those of other shadow group members.

Online commenting by shadow group members (13/13)

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JOINT RESEARCH CENTRE

BATIS - Best Available Techniques Information System Tuesday, 2 April 2019 3:12 PM

European Commission > EU Science Hub > BATIS > Ferrous Metals Processing Industry > **Shadow groups**

Overview **Shadow Group**

Comments by Shadow Group members

BREF Ferrous Metals Processing Industry
Release 1
Shadow Group Batch galvanising shadow group of Cyprus
Owner Hikaru Nakamura
Deadline viernes, 7 junio 2019 23:59:59 CEST

Member All members **Section** All Sections **Date** ≥ **Filter**

3 items [page 1 of 1] 100 items per page Export all Print all

No	Member	Relevance	Comment	Section	Scope	Actions
7	Magnus Carlsen	Major	The technique is not used in the batch galvanising sector.	9.1.8.4 Emissions to air from hot dipping	Selected Text	
9	Fabiano Caruana	Major	There is no applicability column in the table.	9.1.8.4 Emissions to air from hot dipping	Selected Text	
8	Magnus Carlsen	Major	Sectors are missing here.	9.1.8.4 Emissions to air from hot dipping	Selected Text	

Step 16: When you have finished commenting and reviewing the comments of your shadow group, you may wish to log out.

Questions?

Any questions?

You can contact us at jrc-b5-eippcb@ec.europa.eu