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 m/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'.

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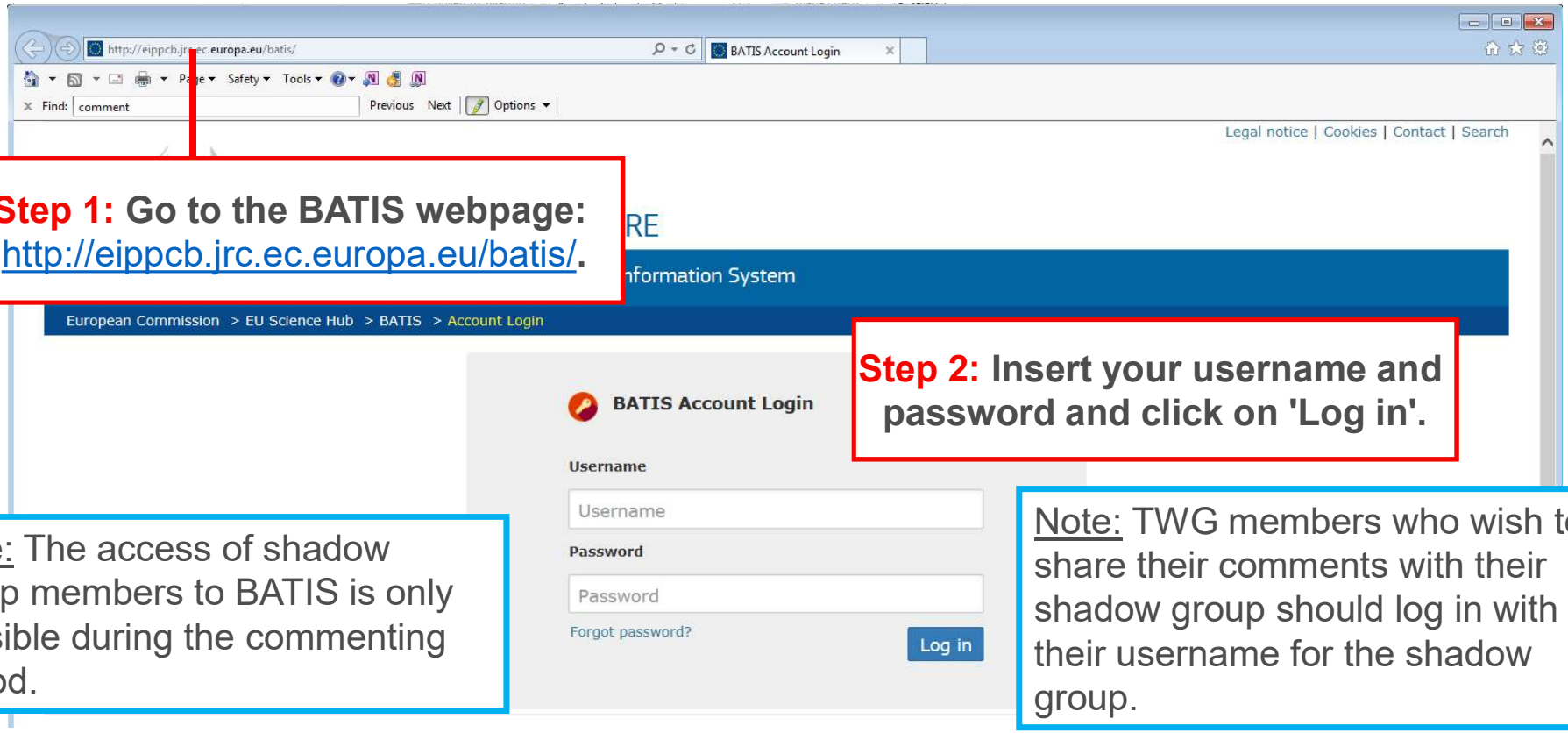
1 – Introduction

2 – Online commenting by shadow group members

Online commenting by shadow group members (1/13)



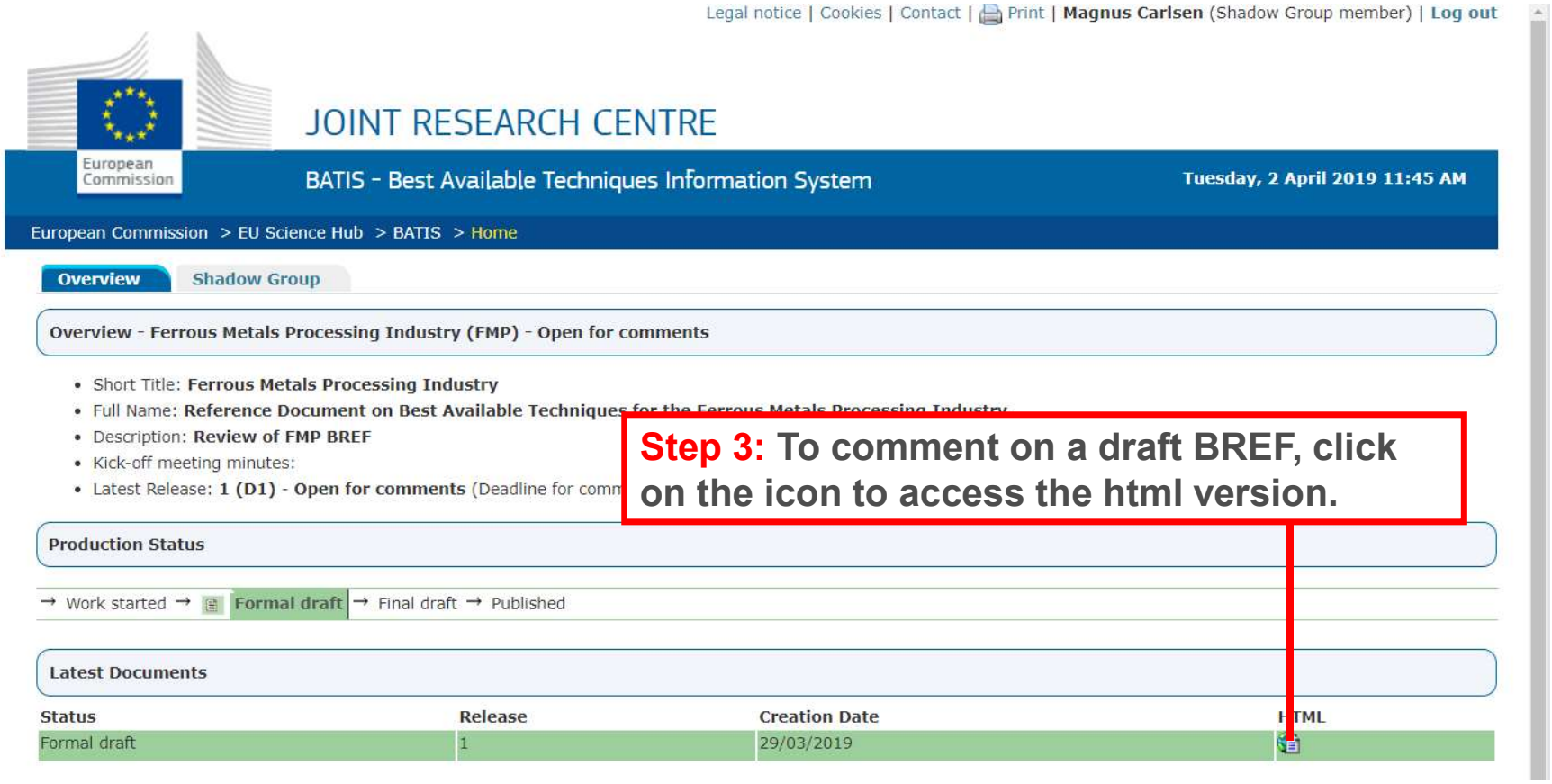
Step 1: Go to the BATIS webpage: http://eippcb.jrc.ec.europa.eu/batis/.

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

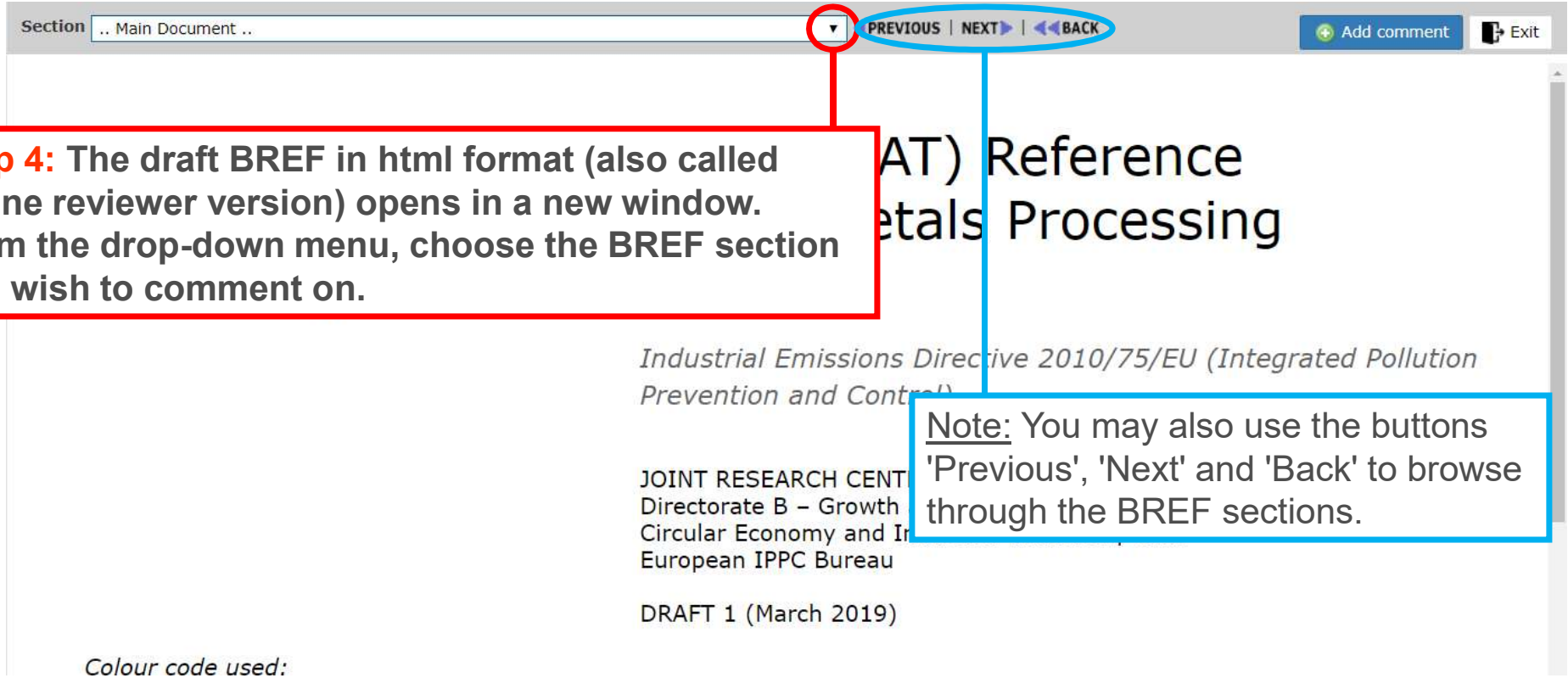
Note: The access of shadow group members to BATIS is only possible during the commenting period.

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)



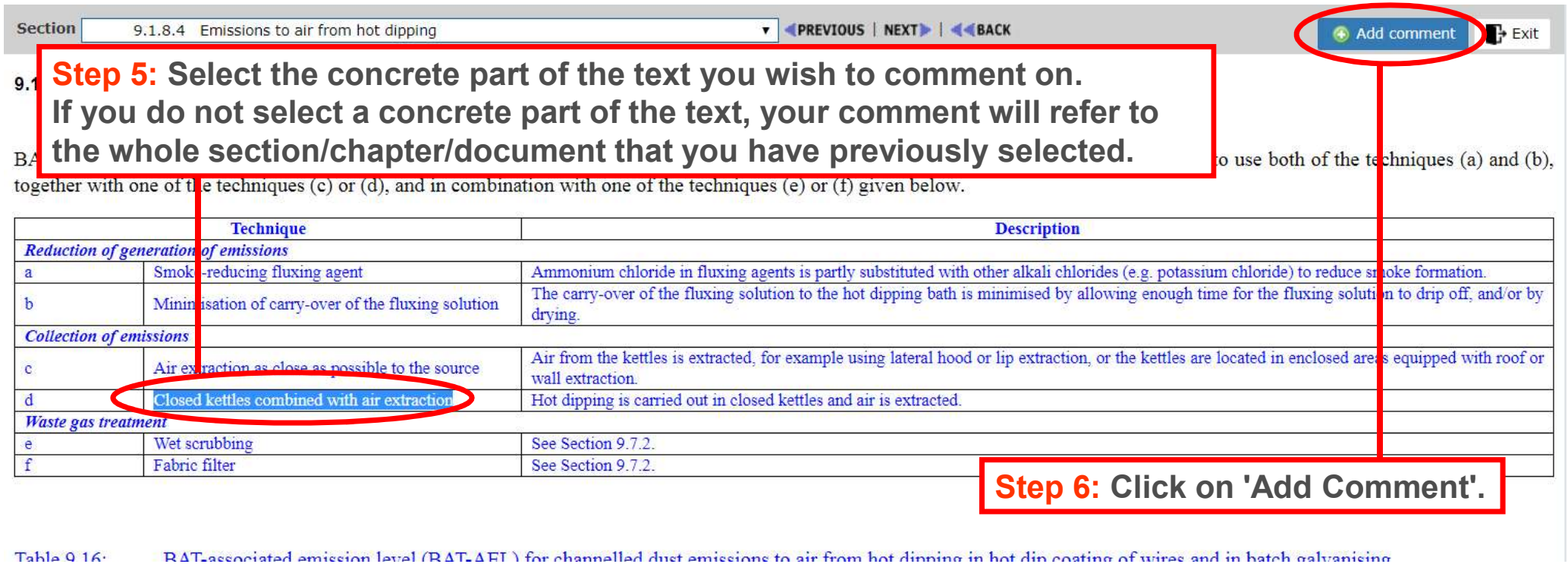
Online commenting by shadow group members (3/13)



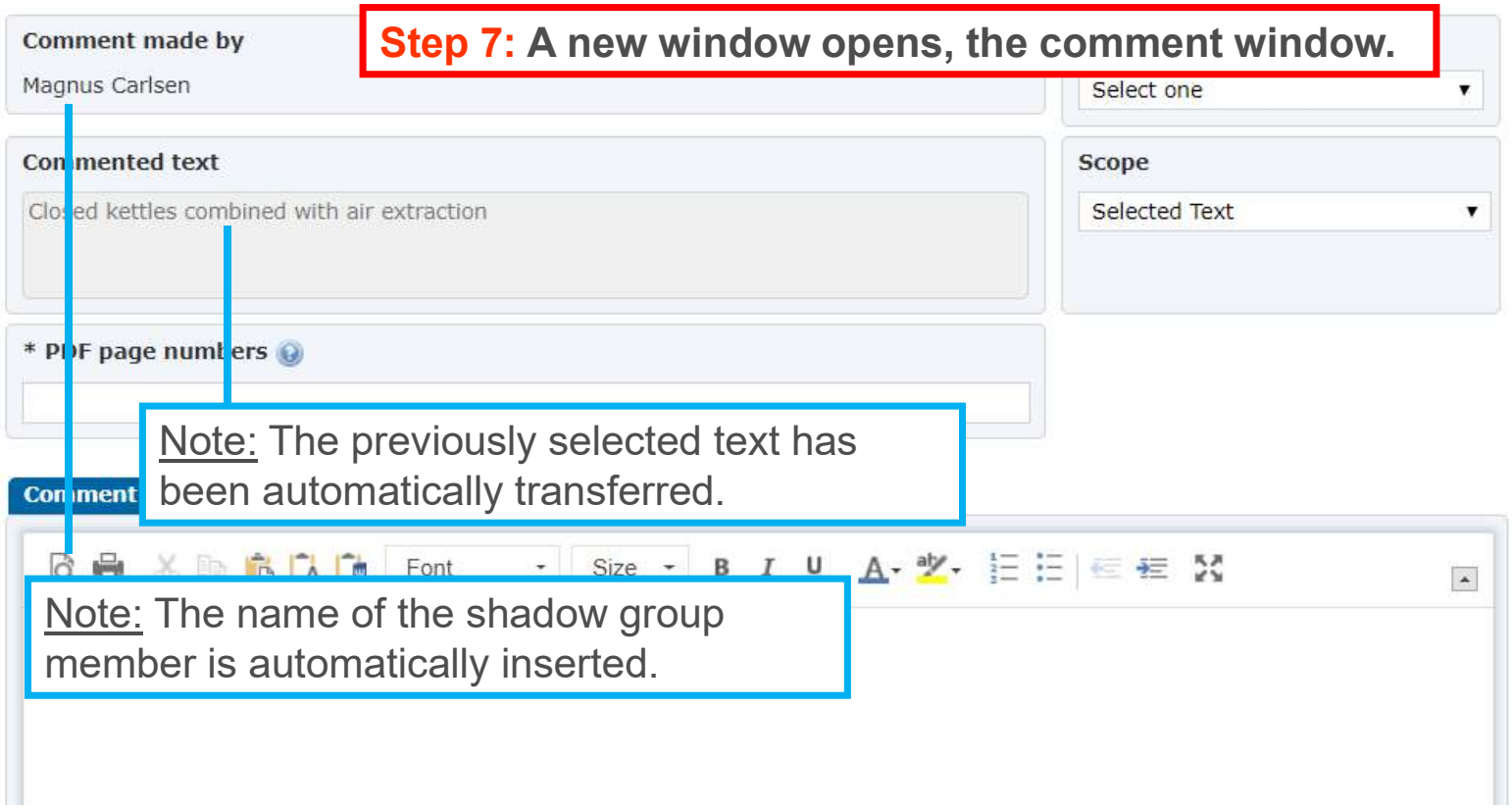
Step 4: **The draft BREF in html format (also called online reviewer version) opens in a new window. From the drop-down menu, choose the BREF section you wish to comment on.**

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

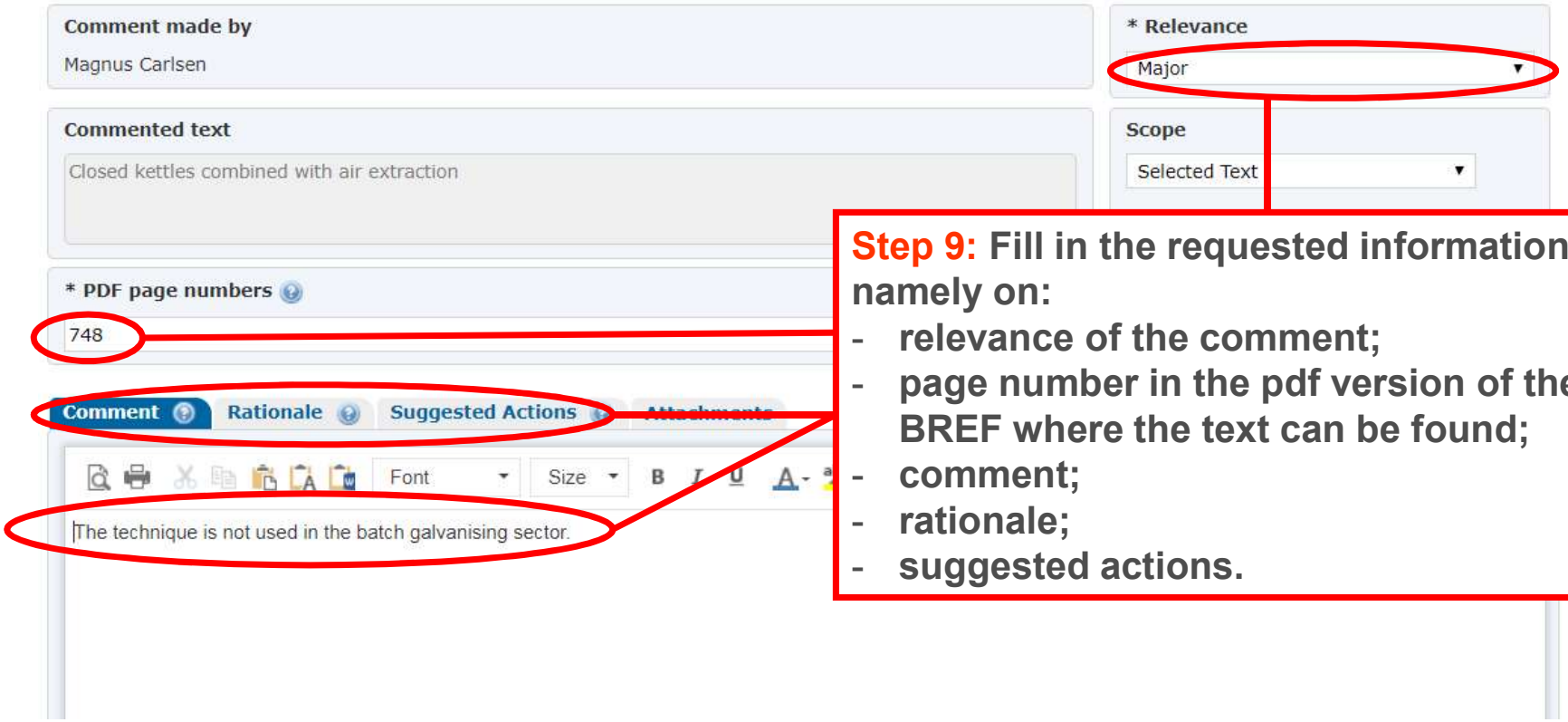
Online commenting by shadow group members (4/13)



Online commenting by shadow group members (5/13)



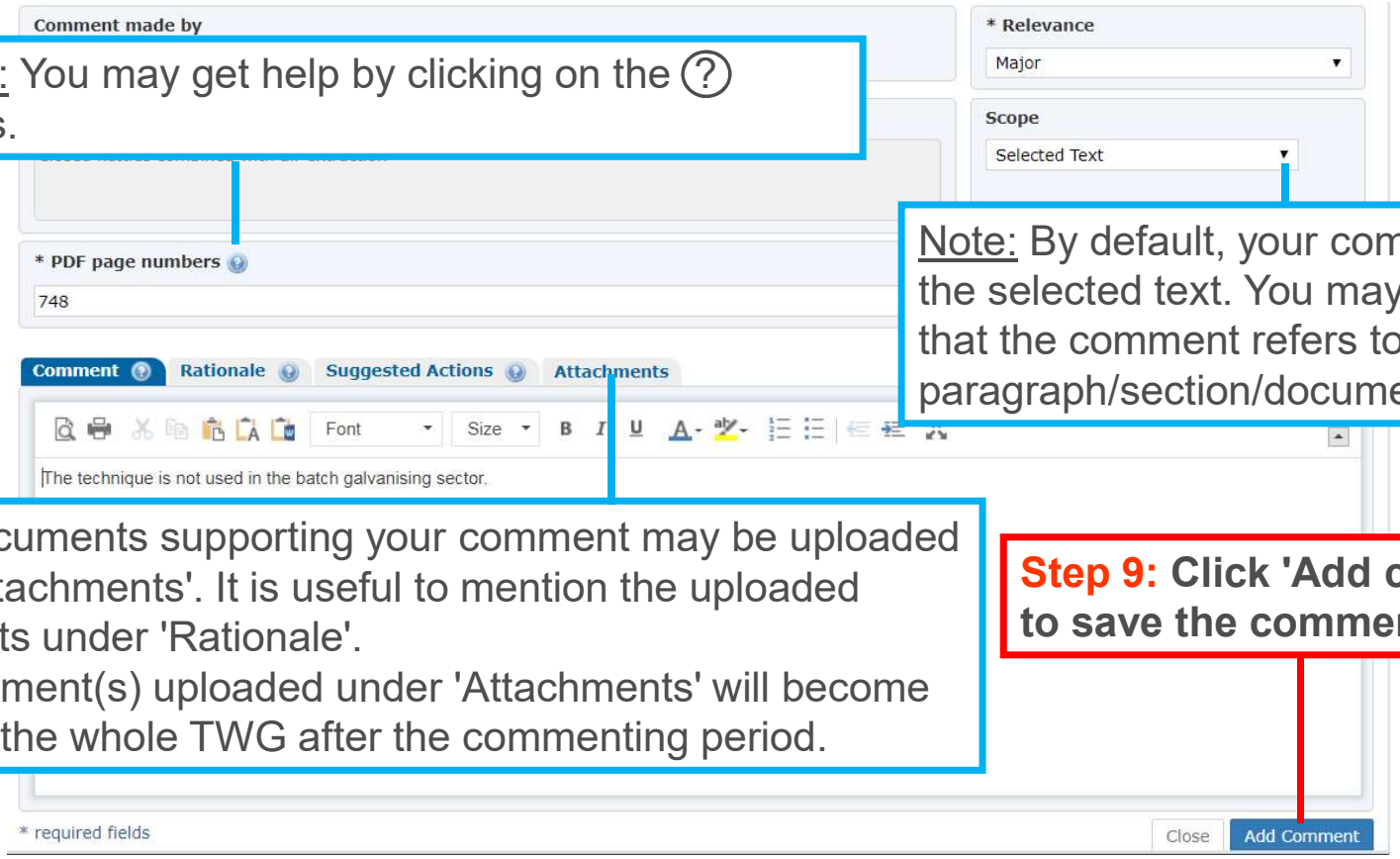
Online commenting by shadow group members (6/13)



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.

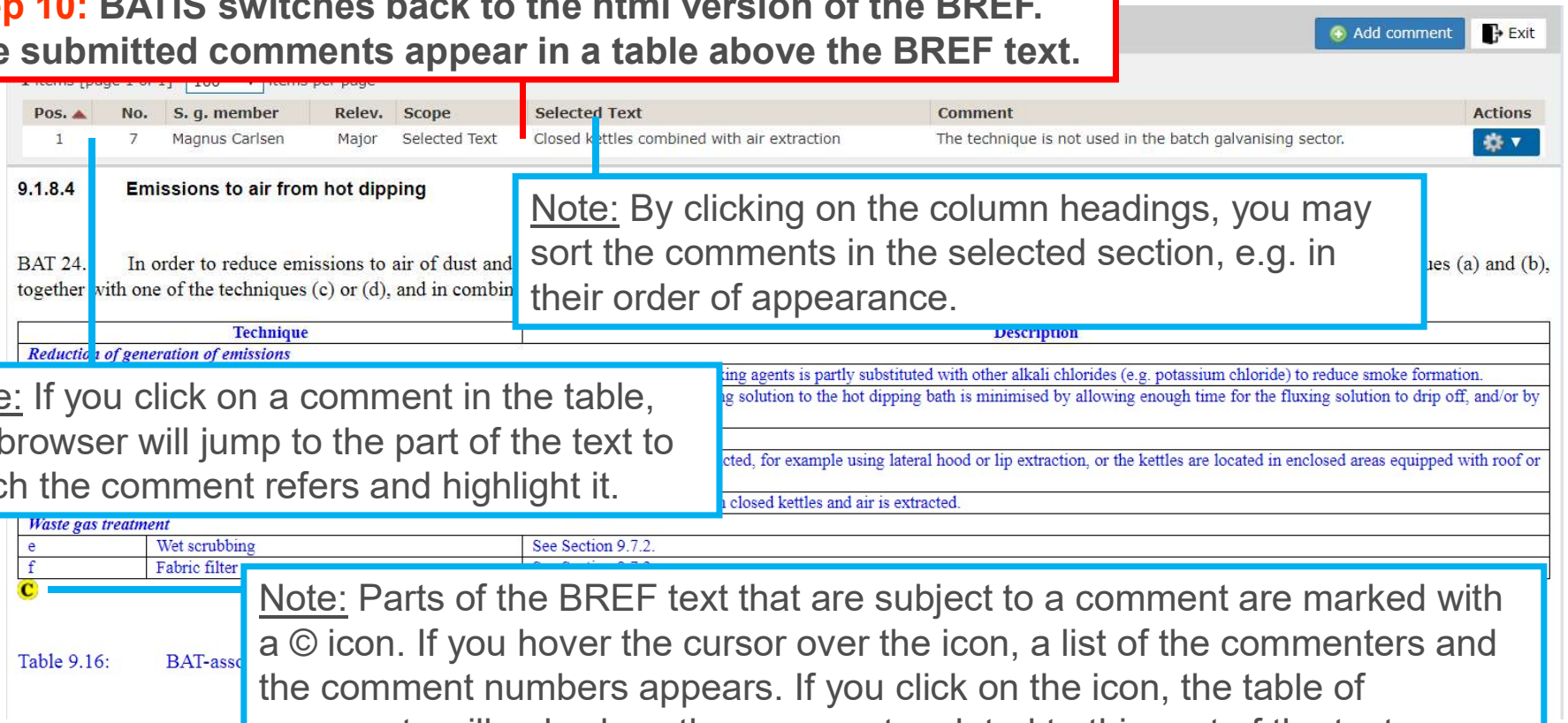
Note: By default, your comment refers to the selected text. You may change this so that the comment refers to the entire paragraph/section/document.

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.

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.

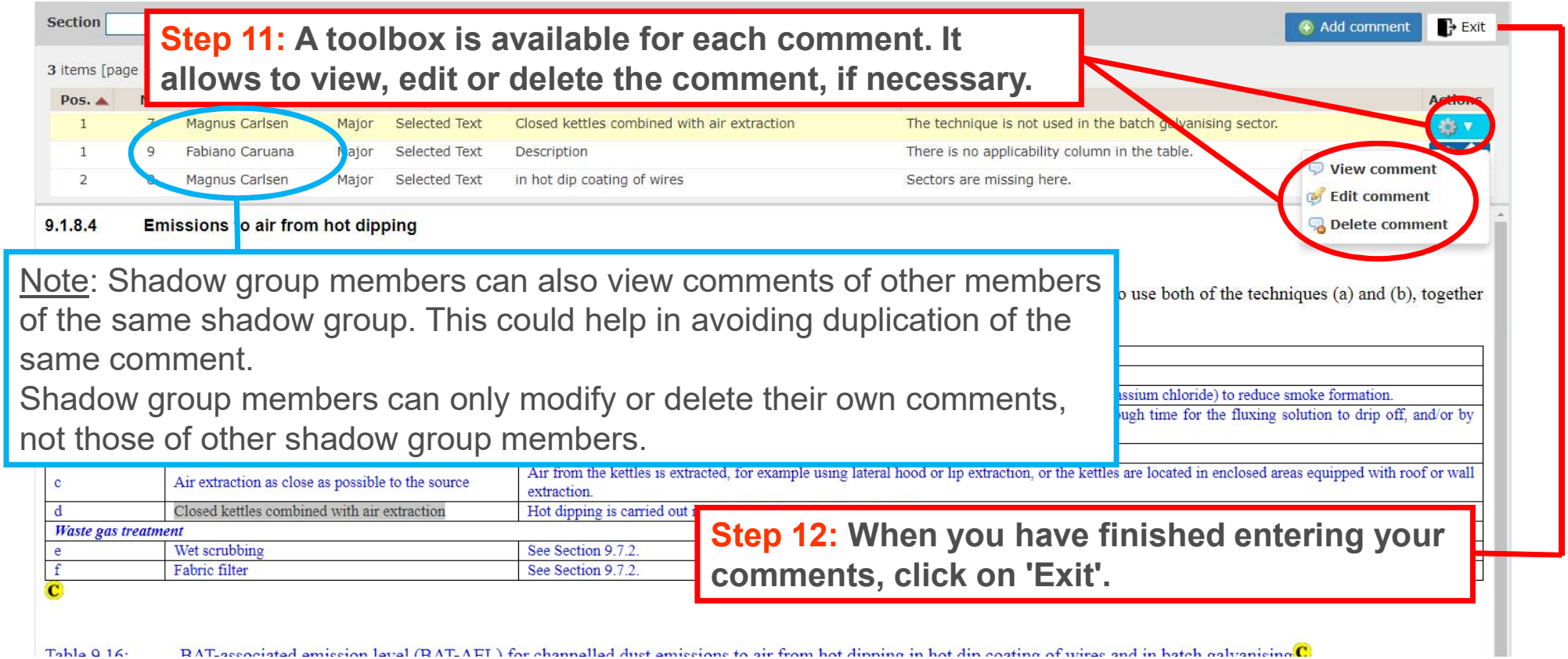


Note: By clicking on the column headings, you may sort the comments in the selected section, e.g. in their order of appearance.

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: 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.

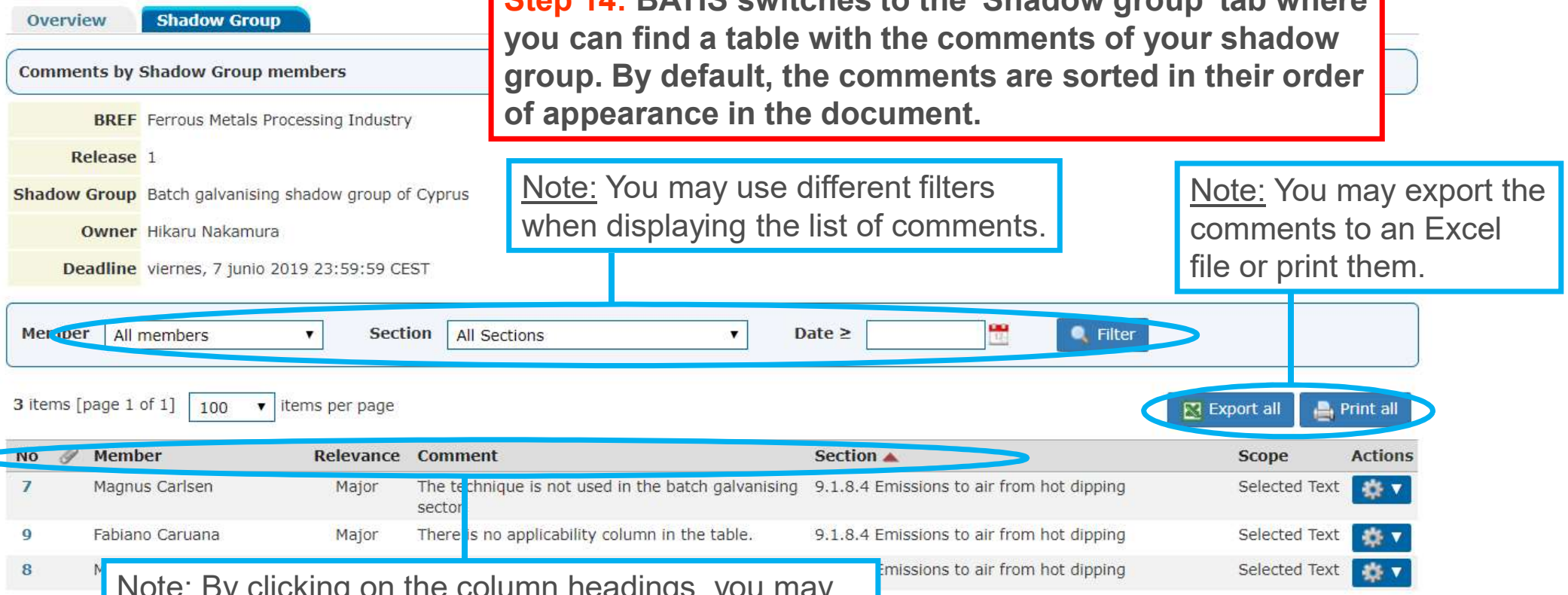
Online commenting by shadow group members (9/13)



Online commenting by shadow group members (10/13)

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.

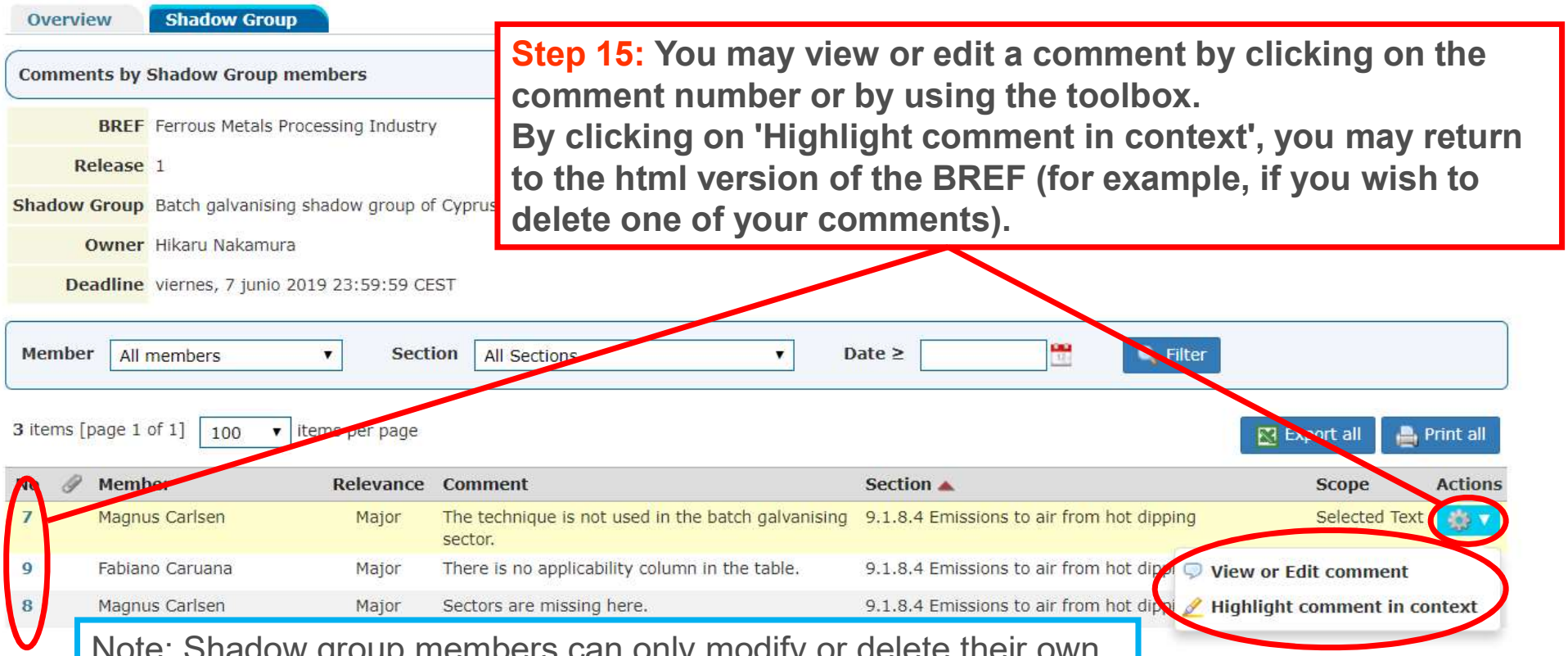


Note: You may use different filters when displaying the list of comments.

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

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

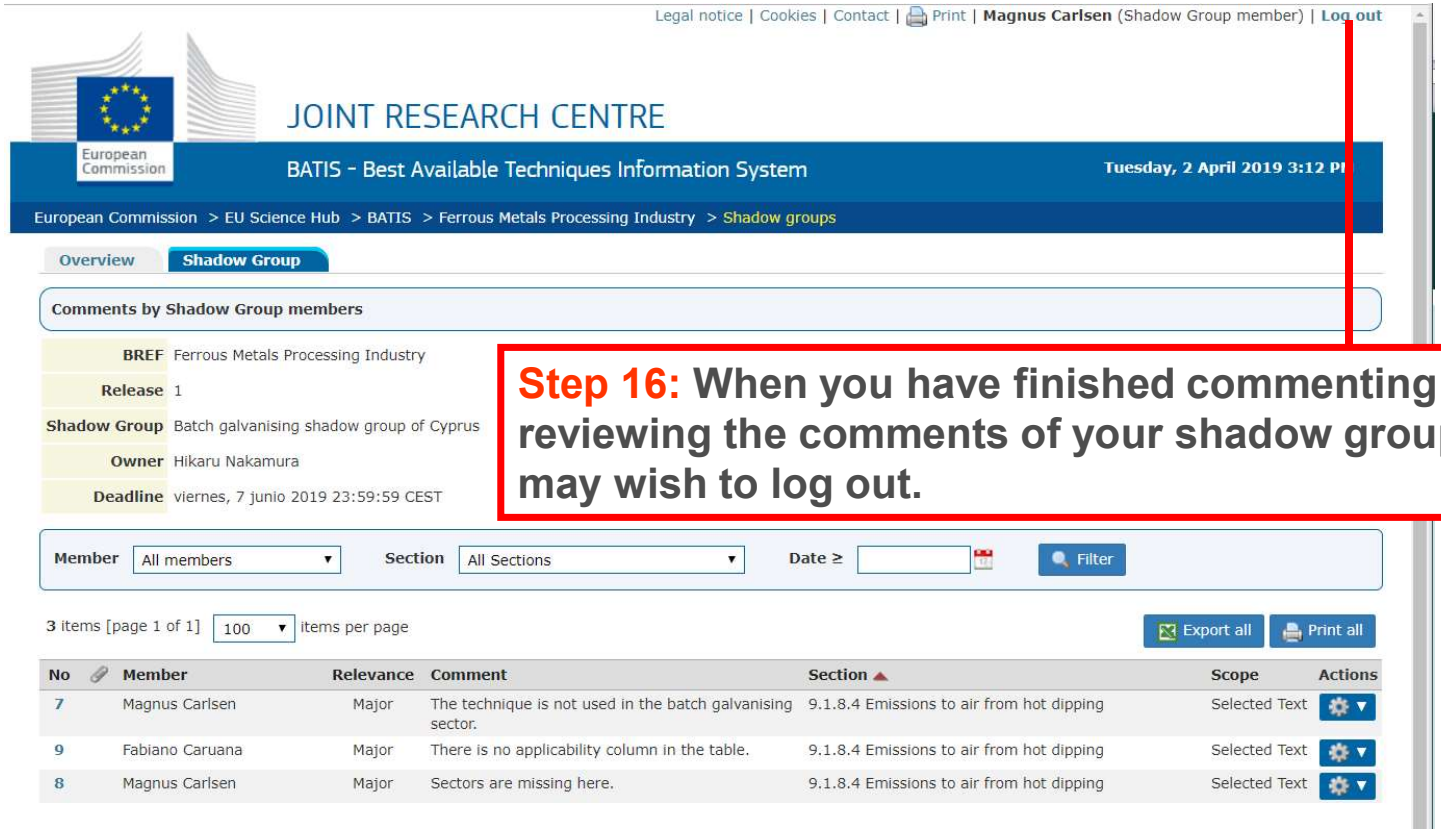
Online commenting by shadow group members (12/13)



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).

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)



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