

Dear EIPPCP

Thank you for your intensive work preparing the first draft.

In European Fishmeal we will study the draft carefully in the next weeks. We have a few initial questions.

1) We have read the cover letter and chapter 5 with the BAT conclusions. We got a bit confused about *channelled emissions of dust, SOX and NOX*.

In the cover letter, it is stated that:

During the kick-off meeting, the TWG decided to include channelled emissions of dust, SOX and NOX 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, SOX and NOX, since they fall within the scope of the Directive on the limitation of emissions of certain pollutants into the air from medium combustion plants (Emphasis added).*

However, in table 5.3 in BAT 15 on page 640 of the first draft, it is stated that:

BAT-associated emission levels (BAT-AELs) for channelled emissions to air of dust, NOX and SOX from the combustion of malodorous gases including non-condensable gases in thermal oxidisers.

It is furthermore listed in BAT 8 that BAT is to monitor NOX in "*Combustion of malodorous gases including non-condensable gases in thermal oxidisers*".

Lastly, in chapter 1 section 1.2.1, it is stated that NOX is considered a KEI for the following types of installation or process:

- Installations processing animal by-products and/or edible co-products when thermal oxidation is used as an abatement technique.
- Incineration of carcasses.
- Combustion of meat-and-bone meal and animal fat.
- Combustion of malodorous gases including non-condensable gases (e.g. in thermal oxidisers or steam boilers) in SA installations.

At the Kick Off meeting it was agreed and accepted by the TWG that the burning of malodourous gases and non-condensable gases in steam boilers was to be included in the BREF process of arriving at BAT-AELs and not in the MCPD. The reason for this decision being arrived at is that the emission levels for Sox and NOx set out in the MCPD are below what can be achieved when burning malodourous gases and non-condensable gases in steam boilers. This decision was included in the minutes of the meeting. It was pointed out during the meeting that this was an efficient method within the industry both in terms cost and the environmental impact of the industry.

The relevant sections in the D1 document and on Combustion processes in the document from Seville dated 29/06/2021 is the first time that the TWG was informed that the EIPPCB had decided not to agree to this and instead to include the use of steam boilers under the MCPD.

We find it difficult to understand that the EIPPCB in the cover letter states, that BAT-AELs for the burning of malodorous gases will not be proposed in draft one although BAT AEL's are proposed in table 5.3 (BAT 15.), and that it in chapter one is listed as if NOx is relevant in four cases and not just when burning malodorous gas. What is the explanation?

2) In draft one, section 5.3.2 on water consumption and wastewater generation, it is unclear whether the EIPPCB count seawater or only freshwater. EFFOP has raised this piece of contextual information several times, both during the data workshop, by mail on October 28, 2020, and as part of our comments to data assessment uploaded to BATIS on October 30, wherefore we are certain that EIPPCB is aware of this. The proposed BAT-AEPL values do also seem to reflect this. We do however find that it would be fruitful that EIPPCB adds a footnote to section 5.3.2 clarifying that BAT is targeting freshwater only. Can you confirm that the BAT AEPL for wastewater discharge is set for fresh water only?

3) We would like to know more about the methodology for setting the various BAT-AEL's. Is the methodology for setting BAT-AEL's described in general by the EIPPCB? Please give us the relevant references. Does the interval set for the BAT-AEL's has to cover a specific percentage of the reference plants?

We need clarification on these matters before we can make any qualified comments on the first draft, why we hope you can provide answers quickly.

Best regards
European Fishmeal