

IPPC Review Internet Consultation Questionnaire

Meta Informations	
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User name	null
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Invitation Ref.	
Status	N
Your Profile	
I am answering ...	on behalf of an organization or an institution
Please select the type of organization or institution you represent.	International organization
Please type your (if individual) or your organization's (if organization) name (max. 100 characters).	
European Respiratory Society	
Please select your (or your organization's) country of residence from the list.	Belgium
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ersinfo.brussels@ersnet.org	
Publication of results	
Do you object to the publication of your personal data and/or your contribution? (Compulsory)	No (the contribution may be published)
Do you object to include your name in a mailing list, which may be used for further consultation, for sending more information or for invitation to Commission events?	No
TOPIC 1: KEY PRINCIPLES OF EU LEGISLATION ON INDUSTRIAL EMISSIONS	
Q1. Please indicate your views on the following statements.	
(1) EU legislation should continue to cover all main environmental impacts of the installations concerned in an integrated way.	I strongly agree
(2) Implementing the Best Available Techniques should remain the key instrument of the EU policy on industrial emissions.	I strongly agree
TOPIC 2: GENERAL IMPLEMENTATION AND BEST AVAILABLE TECHNIQUES (BAT)	
Q2. Please indicate your views on the following possible actions at EU level to	

improve the uptake of Best Available Techniques.

(1) No additional action at EU level is necessary.	I rather disagree
(2) The BAT Reference Documents (BREFs) should play a more central role in determining the required standards for industrial installations, but not be binding to leave some flexibility in setting permit conditions.	I rather agree
(3) The possible deviation from the environmental performance associated with BAT given in the BAT Reference Documents (BREFs) because of the technical characteristics of the installation concerned, its geographical location and the local environmental conditions, should be documented and justified by the authorities in a transparent way.	I rather agree
(4) The permitting of installations should be further harmonized by making the BAT Reference Documents (BREFs) binding for each individual permit, diminishing the flexibility of Member States to take into account the technical characteristics of the installation concerned, its geographical location and the local environmental conditions.	I strongly agree
(5) The permitting of installations should be further harmonized by setting new or updated EU-wide minimum standards for certain sectors if insufficient progress is made towards the implementation of Best Available Techniques as described in the BAT Reference Documents (BREFs).	I strongly agree

TOPIC 3: INCREASE THE EFFECTIVENESS OF THE LEGISLATION

Q3. How important do you believe it is to set at EU level some minimum rules on the following issues.

(1) Inspection by competent authorities in the Member States.	Very important
(2) Monitoring of emissions by industrial operators and reporting of the results to the authorities.	Very important
(3) Reporting on (non-)compliance by industrial operators.	Relatively important
(4) Review of permit conditions to ensure continuous environmental improvement.	Very important

Do you have other views or suggestions for other important actions at EU level to increase the effectiveness of the legislation? (max. 2000 characters):

Q4. In your view, which actions should be taken at EU level to increase the impact of legislation on innovation?

(1) Support specific research that can help to identify new techniques for consideration as potential future Best Available Techniques.	Very important
(2) Allow temporary derogations from the permit obligations during the testing phase of new	Not important at all

innovative techniques with the potential of pollution reduction.	
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Do you have other views or suggestions for other actions at EU level to increase the impact of the legislation on innovation? (max. 2000 characters):

TOPIC 4: ADMINISTRATIVE BURDEN

Q5. In your view, how important are the following possible actions which could be taken at EU level to reduce administrative burdens on operators and competent authorities?

(1) Integrate existing EU pieces of legislation on industrial emissions into a single legal framework.	Very important
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(2) Amend the individual pieces of legislation to improve their interaction without integrating them.	Relatively important
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(3) Remove unnecessary monitoring and reporting requirements from operators.	Relatively important
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(4) Combine and streamline all the reporting requirements from Member States to the Commission.	Very important
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(5) Develop an Action Plan to assist the Member States to reduce their administrative burden.	Not very important
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Do you have other views or suggestions for other actions at EU level to reduce administrative burden? (max. 2000 characters):

TOPIC 5. NO_x and SO₂ EMISSION TRADING

Q6. Please indicate your views on the following statements.

(1) Member States should have the possibility to reduce SO ₂ and NO _x emissions through emission trading (instead of requiring individual BAT-based permits), if local environmental quality and minimization of transboundary pollution can be assured, and if the total level of emission reductions is the same as would result from applying BAT-based individual permits for each installation.	I strongly disagree
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(2) If the emission trading described above under (1) were allowed within or across the Member States, it should be subject to common rules at EU level to ensure consistency, transparency and enforceability of the approaches.	I strongly disagree
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Do you have other views or suggestions on NO _x , SO _x emission trading? (max. 2000 characters)

Do you have other views or suggestions on other (non-trading) market-based instruments which could be foreseen in this context? (max. 2000 characters)

OTHER CONTRIBUTIONS

Q7. Do you have other contributions and suggestions to improve the EU legislation on industrial emissions (relating to scope, activities or any other issues)? (max. 2000 characters)

givingthem_ouremail