

Industrial Emissions Directive revision (IED) Position paper

MARCOGAZ and GIE, with technical support from ENTOSOG welcome the Industrial Emission Directive (IED) revision, as we strongly believe in the IED's effective role in preventing and controlling industrial emissions, fostering the use of the Best Available Techniques (BAT) and promoting emerging technologies. Having considered the revision text proposal from the European Commission, the Council General Approach, and the European Parliament mandate text, we believe that it is important to emphasise the following key aspects:

- **Keep the requirement for the industry proportionate to fulfil the minimum of the Best Available Techniques Associated Emission Limits (BATAEL) range**

To ensure that the most efficient measures are prioritised in a context where available resources are limited, the imposition to fulfil the BATAEL range lower end should be subject to an individual assessment.

In this regard, we particularly welcome the derogation principle in Article 15.4, based on assessing the cost level compared with the environmental benefits. Additionally, we consider important the European Parliament mandate proposal to include Environmental Performance Limit Values in that process for the same reasons as BATAELs.

- **Make clear that for existing sites, imposed Emission Limit Values (ELV) will remain as they are in the current permits until new BAT conclusions are published.**

The existing sites' adaptation will require a sound approach when achievable. The strictest end of the current BATAEL may not be representative anymore and may not apply to an existing site in a technical and operational moving landscape. For existing sites, an individual study will be particularly important, based on an up-to-date Best Available Techniques Reference Document (BREF) revision.

In this regard, we support the addition of the first paragraph of the European Parliament mandate in Article 15.3 to make sure that the requirement to comply with the lower end of the BATAEL will only be applicable when new BAT conclusions will be in force.

- **Mandatory implementation of emerging techniques after 6 years must be conditioned by their maturity level, and remain proportionate**

Emerging techniques identified in BAT conclusions may not be ready after 6 years, and as explained above, for BATAEL strictest end imposition, their implementation shall remain proportionate.

In this regard, we support the European Parliament mandate version of Article 27c, as it adds a "technology readiness level of the emerging techniques" extension principle, beyond 6 years. It

would be consistent, to complete this statement with a provision related to proportionality, introducing derogation principles, as per Article 15.4.

Based on these few central proposals, we are convinced of the efficient applicability of the future directive to the gas infrastructure sector.



MARCOGAZ is the reference association of the gas industry for technical assessment in the midstream and downstream gas systems. It delivers factual insights, used as the basis for regulations, standardisation and legislation in Europe. It provides gas system technical insights on infrastructure, utilisation and sustainability for natural gas and new gases.

www.marcogaz.org



GIE is the voice of the gas infrastructure operators of Europe, including transmission pipelines and underground storage. Its 70 member companies from 26 countries work and innovate with renewable, low-carbon, natural and synthetic gases.

REPowerEU has appointed gas infrastructure as a key mission: safeguard Europe's energy security and enhance its decarbonisation.

www.gie.eu



The European Network of Transmission System Operators for Gas (ENTSOG) was founded in line with Regulation (EC) 715/2009 and has played a key role in facilitating integration of the European gas markets, ensuring technical interoperability and providing security of supply by gas infrastructure planning. Looking forward, ENTSOG is contributing to the net-zero decarbonisation by 2050, in particular, by the integration of renewable and low carbon gases via future-proof gas transmission pipelines, in line with the EU energy and climate goals

www.entsog.eu