

IOGP input to the consultation on the Industrial Emissions Directive

Introduction

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 70% of the oil and gas produced in Europe. IOGP shares the world's ambition to reach the Paris Agreement's goals and supports the EU's objective of climate neutrality by 2050 upon the implementation of enabling measures.

IOGP and its members play a key role in the transition to a low carbon economy, reducing their own emissions, supplying cleaner energy, and developing long-term solutions that also help other sectors to reduce carbon footprint.

IOGP is committed to support tackling air pollution and decreasing environmental pressures and therefore develops international standards and best practice guidelines for the upstream oil and gas sector to further improve its members environmental performance. IOGP has also been instrumental in the development of the Hydrocarbon BAT Guidance Document – demonstrating a pro-active and constructive stance on onshore and offshore issues such as drill cuttings management, chemicals-handling, methane emissions and produced water.

We welcome this opportunity to share our input. In responding to the Commission's consultation on the Industrial emissions – EU rules updated, because of the limitations of the questionnaire format, we would like to share some of our observations and key messages in this written submission.

Executive Summary

We strongly believe that there is already a strong regulatory framework for the upstream oil and gas sector in Europe, and therefore any attempts to extend the IED framework to our sector could result in regulatory overlaps, additional administrative burden, potential delays in implementation of innovative technologies due to longer approval permitting processes, decreased competitiveness, disproportionate cost, and deterioration of the EU energy security and supply for minimal environmental gains. Moreover, special limitations of the offshore environment (limited space and weight capacity, remote geographic location etc.) should be recognized.

We therefore, propose following suggestions to be taken into account when revising IED:

- A thorough cost-benefit analysis and comprehensive impact assessment taking into account all environmental pressures.
- The Medium Combustion Plant Directive (MCPD) is functioning well, limiting environmental impact sufficiently, so there is no direct need for lowering the 50 MW IED threshold.
- The EU ETS should remain as the main instrument to drive the reduction of GHG emissions and is a well-functioning, market-based instrument.
- It is important to maintain the specific derogations secured by IED Article 15, which are subject to scrutinized justification and monitoring by the Competent authorities.

- Imposing BATs and breakthrough technologies that have not been commercially proven would create considerable challenges and uncertainties that are not compatible with investment planning.
- Sufficient public participation is already achieved through the Åarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters, and through Article 24 of the IED.

In addition, a number of identified issues by the Commission are related to the implementation of the IED and not shortcomings of the IED itself. For these reasons, we call for full implementation and application of the existing set of rules and legislation in all the EU member states that would guarantee a successful reduction of pollution.

I. IED scope extension

1. Upstream oil and gas contribution to pollution prevention

European upstream oil and gas activities do not have a significant impact on the environment as shown by the study prepared for the European Commission in 2016¹. The study clearly indicates that the European upstream oil and gas operations have a low environmental pressure, as they are already well managed by the industry at satisfactory level under a transparent and robust regulatory framework. This is also supported by several sector guidelines². Regional and national specific regulations are already established to ensure safe and compliant operations, continuous improvement and monitoring of the performance and to prevent significant environmental impacts at all phases of operations. In addition, the industry is continuously aiming to reduce its environmental footprint and these reductions are demonstrated in several reports³.

Introduction of regulatory changes relating to environmental permitting must take account of the unique characteristics and particularities of upstream offshore oil and gas operations, such as age of installation, geographical location, meteorological conditions, technical limitations, space and weight constraints. A thorough analysis should be performed including assessment of potential environmental benefits versus investment costs. Due to the high investment and operational costs, it should be also considered that additional costs may render some installations uneconomic, and therefore lead to early decommissioning. Consequently, causing decreased oil and gas production in Europe, increasing imports from third countries with lower environmental standards, and therefore leading to indirect increased pollution, and weakening of the EU energy security and supply.

As the upstream oil and gas industry is continuously striving to improve its environmental performance, new regulatory requirements without proven environmental benefits based on cost-benefit analysis could create barriers to innovation and hamper the drive to improve efficiency and environmental performance.

2. Upstream oil and gas activities are already well covered by the existing legislation and industry standards

Upstream oil and gas industry has and will continue to develop best practice across a range of environmental areas and is committed to working with the Commission to identify any areas of further improvement, based on clear and transparency cost-benefit analysis. At this stage, given industry adherence to existing best practices and development of new technological innovation, we do not believe that expansion of the IED represents a potentially cost-effective, environmentally efficient or necessary measure to drive further incremental improvements.

An expansion of the IED scope could even lead to regulatory overlaps and duplications. Double regulation would not mean double reduction of emissions, but would only create an additional administrative burden, could complicate the permitting process and cause further confusion for the complying organizations and the Competent Authorities.

¹ Study on the assessment and management of environmental impacts and risks resulting from the exploration and production of hydrocarbons, Prepared by Amec Foster Wheeler Environment & Infrastructure UK Ltd October 2016: https://ec.europa.eu/environment/integration/energy/pdf/Study_on_the_management_of_environmental_impacts_and_risks_of_conventional_oil_and_gas%20.pdf

² Examples: IOGP report 254 on Environmental management in the upstream oil and gas industry, IOGP report 557 on Drilling waste management technology review, and many others accessible on [IOGP website](https://www.iogp.org).

³ Based on data from:

IOGP Environmental performance indicators – 2019 data: <https://www.iogp.org/bookstore/product-category/data-series/environmental-performance/>

OSPAR Discharges, Spills and Emissions from Offshore Oil and Gas Installations in 2018: <https://www.ospar.org/documents?v=43785>

Draft medium -level review of progress in the North-east Atlantic Environment Strategy for OIC 2021

We would however strongly support improved coherence between various regulatory frameworks such as IED and ETS and other EU and international legislation and agreements. IOGP is ready to organize workshop together with the European Commission and Members States authorities trying to address this issue.

International agreements:

- Regional Sea Conventions (OSPAR, HELCOM, Barcelona and Bucharest Convention). Regional Sea requirements are transposed into national regulations, which can sometimes be more stringent.
 - Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) (in particular, under Annex I on Prevention and elimination of pollution from land-based sources).
 - Barcelona Convention and the Offshore Protocol, where for example the discharge for produced water is incorporated into the Offshore Protocol and therefore it will be legally binding for all the Barcelona Convention parties (EU and non-EU).

EU legislation:

- Safety of Offshore Oil and Gas Operations Directive
- Water Framework Directive
- Industrial Emissions Directive for installations with relevant activities, LCP BREF
- Mining Waste BREF
- EU ETS Directive
- Environmental Impact Assessment Directive
- Marine Strategic Framework Directive
- Waste Framework Directive
- REACH Regulation
- The Hydrocarbon BAT Guidance Document. Although the industry is subject to the HC BAT Guidance Document on voluntary basis, the European Commission has not yet assessed to what extent this document is used applied by the member state authorities or by individual companies.
- Further work is ensured by the EU Offshore Authorities Group (EUOAG) for the oil and gas offshore sector. It holds meetings on a regular basis and is a well-established forum for the sharing of best practice and to ensure harmonisation across countries.

National level

There is a significant body of specialised legislation developed at national level in each of the Member States. Additional measures apply based on specific needs also on regional level, based on evaluation of specific asset characteristics and local conditions (geographical location, soil specification, climate conditions etc.).

Industry

Significant body of guidance and experience has been already developed over decades within the industry, which continues evolving with a view to aligning industry practices with environmental protection principles. There are several well-established platforms in place to ensure that dialogue around these issues continues and is facilitated within the industry and between the industry and regulators (EU OAG, OSPAR OIC, Barcelona OFOG).

IOGP members are committed to adopt and implement the highest feasible operational standards, while IOGP develops international standards and best practice guidelines for the upstream oil and gas sector. Examples such as below could be viewed on [IOGP website](#):

- Environmental management in the upstream oil and gas industry
- Risk Based Assessment of Offshore Produced Water Discharges
- Key principles for the protection, care and rehabilitation of oiled wildlife
- Application of Remote Sensing Technologies for Environmental Monitoring, Guidelines on Implementing Spill Impact Mitigation Assessment (SIMA)
- Oil spill monitoring and sampling: Good practice guidelines for incident management and emergency response personnel

Extension of IED to upstream oil and gas activities would be unnecessary, given that the sector is already covered by myriad of mature and robust international, EU, national and regional legislation. The extension of the IED to upstream oil and gas sector has not been shown based on cost-benefit analysis or stakeholder feedback to be a necessary measure to ensure further improvements in environmental performance. Such a step could lead to additional administrative and cost requirements without commensurate operational or environmental benefit. The industry also continuously aims to improve its environmental performance by introduction and implementation of new standards and best practice guidance.

3. Extending the production capacity thresholds (MCPD thresholds under LCP)

Medium Combustion Plant Directive (MCPD) applicable to onshore and some offshore installations, is functioning well, limiting environmental impact sufficiently, so there is no direct need for lowering the 50 MW IED threshold. Article 12 of the MCPD already foresees that the European Commission would assess the need to review ELVs for new MCPs on the basis of the state of the art technologies. Offshore, the LCP BREF applies to combustion plants above 50MW thermal input.

Moreover, **the European Commission states that “the MCPD is a good example of Better Regulation. It has been designed to be affordable for SMEs, and provides long-term certainty for all economic operators concerned whilst minimising the administrative burden for both industry and Member States. It will encourage continued innovation and thus provide the opportunity for EU industry to share in the rapidly growing global market for pollution control technology.”**⁴

4. Decarbonization instruments

IOGP supports the EU’s objective of climate neutrality by 2050, and believes that enabling and incentivising policy measures are needed.

Upstream oil and gas installations above 20 MW are already covered by the EU Emissions Trading System (EU ETS), which proved to be a well-functioning market-based tool stimulating the reduction of greenhouse gases.

The IED Article 9.1 states that permits shall not include an Emission Limit Value for direct emissions of greenhouse gases covered by the ETS, unless necessary to ensure that no significant local pollution is caused. Otherwise, it would be imposing unnecessary double regulation and additionally could also disrupt the market price, which would hinder the effective functioning of the EU ETS⁵.

To avoid double regulation, we strongly support to maintain Article 9.1 unchanged for ETS sector to deliver most cost-effective decarbonisation solutions. The EU ETS should remain as the main instrument to drive the reduction of GHG emissions. It is a well-functioning, market-based instrument widely supported across the industry regulating the emissions in the most cost-efficient way.

⁴ The European Commission webpage on MCPD: <https://ec.europa.eu/environment/industry/stationary/mcp.htm>

⁵ This would also not be aligned with the Better Regulation principles and statement from the EU ETS handbook “The EU chose a “cap-and-trade” structure as the best means of meeting the GHG emissions reduction target at least overall cost to participants and the economy as a whole. It allows a set environmental outcome to be achieved at lowest costs. A traditional command-and-control approach may mandate a standard limit per installation, but provides little flexibility to companies as to where or how emissions reductions take place”.

II. Other outstanding issues

5. Derogation (IED Art.15.4)

It is important to maintain the specific derogations secured by IED Article 15. The operators should have the possibility to indicate the disproportionately higher costs compared to the environmental benefits. If needed to be supported by a clear criteria on Return on Investment (ROI) within x years and taking into account the remaining life of the installation that can be at the discretion of the member states. **Absence of such a derogation could lead to a lack of flexibility and even early decommissioning with negative environmental results as oil and gas would need to be imported from regions which may have less stringent environmental regulations.**

6. Emerging techniques and breakthrough technologies

We would like to urge against addition of emerging best available techniques BAT AEL's into the permitting process. Imposing BATs and breakthrough technologies that have not been commercially proven would create considerable challenges and uncertainties (cost, readiness) that are not compatible with investment planning. The industry, welcomes and already aims to apply the breakthrough technologies, but does not support application of binding AELs.

7. Participation of public

The Aarhus Convention on access to information, already ensures the public participation in decision-making and access to justice in environmental matters. It is also ensured by Article 24 of the IED giving the early and effective opportunities to participate in the permitting procedures. We believe that the existing process are functioning efficiently, but more focus should be on the harmonized implementation.

Further enhancement of this existing instrument would extend the decision-making process prolonging the issue of permits. Therefore, balance should be maintained to avoid unnecessary regulatory and administrative burden.

Conclusions

As highlighted by the COVID-19 pandemic, stable and predictable regulation is of key importance for medium and long-term investment. The risk of uncertainty and unpredictability as the result of incoherence with pre-existing instruments, as set out above, would have a detrimental effect on the upstream oil and gas industry in the EU. Number of upstream oil and gas operations in the EU have already significantly decreased due to Brexit, and at the same time the industry is entering a maturity and decommissioning phase in many parts of the EU.

IED-EPRTTR-Revision-OPC-2020

Fields marked with * are mandatory.

Survey for Public Consultation

Introduction: European Green Deal, and the Role of Industry in Cleaning and Greening the EU

The European Green Deal sets the overall strategy on dealing with climate-related and wider environmental challenges whilst achieving “greener” EU economic growth.

In parallel, the Industrial Strategy for Europe highlights the need for new processes and technologies, innovation and investment to strengthen our industrial competitiveness and facilitate industry’s shift to a climate neutral, clean and circular economy.

Since 1996, integrated pollution prevention and control (IPPC) methodologies and legislation has been the way in which the EU’s Member States have issued environmental permits to govern the operation of larger industrial plants. The latest version of the EU legal rules is called the Industrial Emission Directive (IED) - Directive 2010/75/EU. The IED is effective in controlling pollution to air, water and soil from larger industrial and agricultural plants in an integrated way, and in pushing forward the incorporation of innovative “Best Available Techniques” [1]

Working hand-in-hand with the IED, the European Pollutant Release and Transfer Register (E-PRTR) Regulation (EC) 166/2006 (as amended) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The new European Green Deal and the Zero Pollution Ambition for Europe

The European Green Deal, adopted in December 2019, seeks to go way beyond the current policies to control emissions to air, water and soil. It sets out a long-term pathway to 2050, to ensure a climate-neutral, clean and circular economy, optimising waste management and minimising pollution over this timeframe.

The Green Deal commits inter alia to:

1. adopting an action plan towards a zero pollution ambition. Separate consultations on the Zero Pollution Action Plan initiative are ongoing.
2. revising EU measures to address pollution from large industrial plants, including both the IED and the E-PRTR, to:

- Look at the sectoral scope of the legislation and at how to make it fully consistent with climate, energy and circular economy policies
- Ensure that industry sectors maintain their role in improving the EU's environment
- Increase the take-up by industry and agricultural sectors of novel and proven techniques to create a more sustainable EU economy, at the same time as achieving a cleaner environment that improves public health
- Improve public access to environmental information.

The scope of the revisions mentioned above are summarised in two brief documents: the IED inception impact assessment and the E-PRTR inception impact assessment.

The IED (Industrial Emissions Directive) – in more detail

The IED controls the environmental impacts of over 50,000 of the larger-scale agricultural and industrial activities in an integrated manner, to achieve a high level of protection of the environment. Activities regulated by the IED include power plants, refineries, waste treatment and incineration, production of steel, non-ferrous metals, cement, lime, glass, chemicals, ceramics, pulp and paper, food and drink, as well as the intensive rearing of pigs and poultry.

National authorities are obliged to issue permits for plants conducting activities under the scope of the IED, with permit conditions based on the use of Best Available Techniques (BAT). To ensure a consistent EU approach, sectoral BAT reference documents (BREFs) – tailored to each agricultural or industrial activity - are produced via EU-wide assessment with Technical Working Groups whose members include environmental and civil society NGOs, industry associations, EU Member States and the European Commission. So-called 'BAT conclusions' derived from these discussions, are then formally adopted into EU law and are binding. EU Member States' permitting authorities must use these as the reference when setting permit conditions.

The IED was evaluated earlier in 2020 to check how it was functioning. Findings from this evaluation included:

- Pollution is still occurring across the EU from large (agro)industrial plants (including emissions to air, water and soil; and use of harmful substances)
- Extending the IED to other sectors or activities could be appropriate, or thresholds at which plants become subject to the IED might be changed, in order to reduce significant pollution
- Member States are implementing EU IED requirements in a heterogeneous manner, including the stricter BAT conclusions measures. The result is that the environmental ambition varies across the EU's Member States
- Further efforts could be made to support the decarbonisation efforts of large-scale industries and agricultural activities as a whole
- Large industrial and agricultural facilities could contribute more to a circular economy, and their exploitation of natural resources could be reduced
- The IED may be able to more proactively promote new production processes, technologies and innovation

- Greater coherence and synergies with other EU legislation (e.g., the Emissions Trading System, the Landfill Directive and waste management opportunities) could be exploited.
- There is insufficient public access to information, participation in decision making and access to justice with regard to permitting decisions and revisions.

The European Pollutant Release and Transfer Register (E-PRTR)

The E-PRTR is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The register contains data reported annually by some 30,000 industrial facilities covering 65 economic activities across Europe, and complements the IED. It should be noted that some activities are covered by E-PRTR but not by IED (e.g. mining).

The E-PRTR registry contains details at Member State level of plants and related pollution/ discharges information throughout the EU, also enabling searches on individual or groups of pollutants to be made, including heavy metals, pesticides, greenhouse gases and dioxins for the year 2007 onwards. Some information on releases from diffuse sources is also available. Member States update the register's website annually.

The E-PRTR contributes to transparency and public participation in environmental decision-making. It implements, for the European Union, the UNECE (United Nations Economic Commission for Europe) PRTR Protocol to the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

An evaluation of the E-PRTR concluded in 2016 that whilst the E-PRTR Regulation was very much fit for purpose, some elements could be improved, e.g. in areas where there were opportunities for simplification and cost savings, and where the scope of the current Regulation could be extended to improve coherence with the following policy areas:

- the IED (for some industrial activity definitions, and for the Large Combustion Plant inventory)
- EU waste law (e.g. level of detail required for waste types when reporting transfers, and risk of discrepancies in reporting, depending on whether the waste is being treated, or disposed of)
- the Emissions Trading System (and differences in activities and thresholds)
- water legislation (and emission to water reporting requirements); and
- the INSPIRE (INfrastructure for SPatial InfoRmation in Europe) directive, relating to the interoperability of spatial datasets.

Your role – what you can do to help us ... and the EU

The purpose of this consultation is to gather the views of the public on revising the IED and E-PRTR.

First of all, we would like to enlist your help in understanding existing problems better. Secondly, we are trying to identify policy options to address these problems efficiently, clearly and coherently.

We are conducting the work on Impact Assessment to possibly revise the IED and the E-PRTR in parallel, to make the process more coherent and streamlined.

Content of this consultation

The consultation is divided into three parts:

- Part 1 - asks for some information about you (such as which country you come from).
- Part 2 - aims to gather information on general awareness and views of the impact of large (agro) industrial plants on the environment and the measures to manage it. The questions are aimed at the general public, and do not require any particular specialist knowledge, solely an interest in the area.
- Part 3 - contains more detailed questions – it is addressed to those persons with more experience/ expertise in the area, who may wish to comment in greater depth on the impact of large (agro) industrial plants on the environment and the measures to manage it in the revisions under consideration. (Please also note that there will be also be a follow-on Targeted Stakeholder Survey for experts, and other general/ specific consultation opportunities via stakeholder meetings – see below).

Part 3 gives you the opportunity to let us know if you wish to take part in the follow-on Targeted Stakeholder Survey, and also to join in more detailed focus groups, interviews and stakeholder consultations.

At the end of the questionnaire, you are also able to upload one document (e.g. technical information, Position Paper, etc) supporting and detailing your views. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

All responses to this consultation will be assessed and the results will be included in the analysis supporting our next steps. We will also produce a stand-alone factual summary on the input received, as well as a more detailed analysis of all consultation activities, which will be made available on the “Better Regulation” portal of the European Commission’s website in the 2nd Quarter of 2021. More detailed material gathered during the consultation exercise may be uploaded to the publicly-available area of the Commission’s “CIRCABC” library, and links to this will be provided to the general public.

If you have any questions, please contact the European Commission at this dedicated email address: **ENV-IED-REVISION@ec.europa.eu**

Your opinion matters, and we are very grateful to you for taking the time to answer these questions.

[1] Defined in Article 3 (10) of Directive 2010/75/EU as a combination of “best”, “techniques” and “available techniques”. Using this trio of conditions, the emphasis of the end result is (sensu lato) on achieving the most effective way of protecting the environment as a whole, under economically and technically viable conditions, and referring to the way in which the installation is designed, built, maintained, operated and decommissioned.

Part 2 – General awareness and views on the environmental impacts of agro-industrial activities

This section asks about your general awareness of industrial emissions policy and to gather general views on revising the Industrial Emissions Directive (IED) and European Pollutant Release and Transfer Register (E-PRTR) Regulation. In each question, please select the answer which best represents your views.

Please note that you can choose to respond to this section - Part 2 – and then choose not to answer the following section (Part 3). NB Also, in either Part 2 or Part 3 – you do not need to answer all of the questions.

1. How important are the impacts of large industrial plants and intensive agricultural installations on the following environmental issues? :

	Very Important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil pollution (contaminated land)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution of rivers, lakes and ground water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Depletion of natural resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Perturbing natural habitats and ecosystems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of pollution or impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other please specify

300 character(s) maximum

2. Today, what is the contribution of large (agro)industrial plants to the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other issues, please specify

300 character(s) maximum

3. Post-2030, how important should the role be of large (agro)industrial plants for the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising pollution of soils, water and air in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising industry's emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising agriculture-related emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising effects on nearby natural habitats and ecosystems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Facilitating other
changes



If other changes, please specify them

300 character(s) maximum

4. In the place where you mostly live, work or study, are there:

	Please tick one
No large (agro)industrial activities (if so, you may wish to skip Questions 5, 6 & 7)	<input type="radio"/>
Relatively few large (agro)industrial activities?	<input type="radio"/>
Some large (agro)industrial activities	<input type="radio"/>
Medium levels of large (agro)industrial activities	<input type="radio"/>
High levels of large (agro)industrial activities	<input type="radio"/>
I do not know	<input type="radio"/>

5. With regard to available information on the level of environmental impacts of large (agro)industrial plants in your places of interest (place where you live, work or study), do you agree that:

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
You have access to sufficient information on the types of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
You have access to sufficient information on the level of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

300 character(s) maximum

6. With regard to the granting, revision or enforcement of operating permits for large (agro)industrial plants in your places of interest (place where you live, work or study), how important is the principle that the public can find the information on the following questions... :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Which authority is responsible for granting and enforcing permits for the operation of large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I participate in the granting or revision of permitting decisions for large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I appeal against the granting of such permits, or appeal for them to be revised?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

300 character(s) maximum

7. For your places of interest (where you live, work or study), can you find information on the following? :

	Yes	No	I don't know
New or recent environmental permit applications to operate large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental permits that have already been granted to operate large (agro) industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance details for operators of large (agro)industrial plants with their environmental permit conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions monitoring data related to large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting information on environmental management performance of large (agro) industrial plants (e.g. resource consumption, energy use, greenhouse gas emissions, other)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT) for industry sectors / farming installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures and decisions related to the operation of large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

On behalf of the DG Environment IED Team, thank you very much for your time and your contribution!

NB PLEASE FEEL FREE TO STOP HERE, OR TO CONTINUE TO PART 3 (DETAILED QUESTIONS, requiring some specialised knowledge)

If you have any questions, please contact the European Commission at this dedicated email address: ENV-IED-REVISION@ec.europa.eu

Part 3 – Detailed questions on revision of the IED and the E-PRTR

Part 3 seeks to gather more detailed views on revising the IED provisions and the E-PRTR. Please select the answer which best represents your views.

Please note that you can choose to respond to Part 3 only. Not all questions need to be answered.

8. Do you agree with the following statement, with regard to each environmental issue outlined below? “The existing Industrial Emissions Directive, supplemented by horizontal legislation (e.g., Framework Directives on Waste and Water, Emissions Trading System, etc) and guidance on operating large (agro)industrial plants, sufficiently controls environmental impacts from these installations regarding...” :

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Air quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fresh water quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine water quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient water use in processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient energy use in processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumption of raw materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil contamination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Generation of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitats and ecosystems, especially close to installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fostering Circular Economy approaches	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other issues, please specify them

300 character(s) maximum

9. For existing sectors covered by IED BREFs, to what extent do you agree that the following activities carried out at large (agro)industrial plants still have a significant negative impact on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy – large combustion plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy – oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - iron and steel, and other ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry - glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Waste incineration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Independent industrial wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Slaughterhouses & animal by-products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ceramics industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of poultry or pigs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you think that the threshold for consideration under the IED should be reduced or modified for any of the above sectors? If so, to what level(s)? (500 character maximum limit)

500 character(s) maximum

10. Looking at possible NEW sectors to be covered by the IED and the associated BREFs process, to what extent do you agree that the following additional activities need to be addressed by the IED in order to significantly reduce significant negative impacts on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy industries – medium combustion plants (i.e. under the IED, rather than via the existing Medium Combustion Plant Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy – oil and gas extraction activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Landfills - management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage of Hazardous Substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other activities, please specify which

300 character(s) maximum

11. To what extent do you think that the functioning of these current IED procedures needs to be improved in the future to optimise them?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
Environmental permitting procedure to operate an (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site inspections to ensure compliance with environmental permit conditions to operate an (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting of emissions monitoring data related to compliance with environmental permit conditions to operate the (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ease of obtaining information on what are considered to be best available techniques (BAT)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures related to the operation of large (agro) industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other issues - please specify which

300 character(s) maximum

12. How would you rate the functioning of the following aspects regarding the public's access to information in relation to agro-industrial activities and their impacts on the environment and on human health?

	Very easily available	Available moderately easily	Neither easily available nor difficult to access	Moderately difficult to access	Very difficult to access	I don't know

Information on IED permits already granted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information submitted by operators/ potential operators to competent authorities prior to IED permits being granted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the compliance of plants with IED permit conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions monitoring data from agro-industrial plants covered by the IED	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of BAT at the individual (agro) industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other public information areas related to plant covered by the IED	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental performance of large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other public information areas, please specify which

300 character(s) maximum

13. To what extent do you think that enabling greater public participation in decision making in these current IED procedures needs to be improved in the future to optimise them, related to (agro)industrial activities and their impacts on the environment?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
IED permit applications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

BAT-AEL derogation on the grounds of geographical location, local environmental conditions or installation's technical characteristics – Article 15(4) of the IED	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other areas of public participation in IED decision making should be improved , please specify which

300 character(s) maximum

14. How would you rate the information provided in the E-PRTR regarding the environmental performance of large (agro)industrial plants?

	Very complete	Moderately complete	Neither complete nor incomplete	Moderately incomplete	Very incomplete	I don't know
Releases to air	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to soil	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers to waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to air	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases of pollutants from accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production volume of the facility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other issues - please specify if other aspects of environmental performance should be covered by the E-PRTR

300 character(s) maximum

15. How do you rate the search capability for information on industrial plant and agricultural operations in the E-PRTR? Do you consider that the following aspects work... ? :

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
Search by - facility name	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by - industrial activity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by - pollutant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by - geographical location	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other public information areas, please specify which

300 character(s) maximum

16. Going into sector-specific data in the E-PRTR, how would you rate the usefulness of the E-PRTR with regard to environmental performance data on these (agro)industrial sectors?

	Very satisfactory	Moderately satisfactory	Neither satisfactory nor unsatisfactory	Moderately unsatisfactory	Very unsatisfactory	I don't know
Energy – large combustion plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy –oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - iron and steel, other ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry						

processes - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry – glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non- hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste incineration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of poultry or pigs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy use – medium combustion plants (i.e., via IED, rather than via existing MCP Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other activities, please specify which

300 character(s) maximum

17. Thinking in more detail about the pollutants covered by the E-PRTR:

a) Are there any pollutants that should be removed from the E-PRTR?

b) Are there any pollutants that should be added to the E-PRTR?

c) Are there existing E-PRTR pollutants, or their reporting thresholds, that should be amended? Please specify which

300 character(s) maximum

18. How well does public access to justice function in relation to (agro)industrial activities (e.g., siting of plant, operating permits etc)?

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
Public access to justice in my Member State	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public access to justice at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The right to bring a case before a court, or to ask for a judicial review in my Member State, functions...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other related elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you refer to other related elements, please specify which

300 character(s) maximum

If you think that other areas of public access to justice need to be addressed or improved with regard to agro-industrial plants, please specify which

300 character(s) maximum

19. In order to reach the objectives listed in the table below, what would be the necessary level of contribution from operators of large (agro)industrial plants? :

	Very high	High	Moderate	Low	Very low	I don't know
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a Circular Economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

20. 'In order to achieve the objectives listed in the table below, what would be the degree of effort needed from Member States' responsible competent authorities for large (agro)industrial plants? :

	Very high	High	Moderate	Low	Very low	I don't know
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing coherence with other EU environmental legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence with other EU safety-related legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

21. Could the following objectives be achieved by EU Member States alone without intervention at EU level? (i.e. greater use of subsidiarity)

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Progress towards a zero-pollution ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribute to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU industry's competitiveness, resilience and transition to becoming climate-neutral, through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support new technologies and innovation that will facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence and synergies with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

22. When reviewing policy options in the IED and E-PRTR, how would you assess the following, in relative importance?

	Very important	Relatively important	Neutral	Relatively unimportant	Not important	I don't know
Options that contribute to a zero-pollution ambition for a toxic-free environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support EU industry's transition to becoming climate-neutral through decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that realise EU industry's potential contribution to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support new technologies and innovation, that will support competitiveness and resilience and facilitate industry's shift to a climate-neutral, clean and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support public access to environmental information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

relating to the impacts of industrial emissions; and also						
Options to ensure a level playing field for companies and consistent regulatory implementation across EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that empower public participation in environmental decision making and access to justice.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that keep the administrative burden on business, and on government administrations, at a low level, but without compromising the effectiveness and efficiency of the EU in meeting its objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

23. In your opinion, when reviewing options for the revision of the IED, what are the main future potential impacts on large (agro)industrial plants that will need to be assessed (max. 500 characters, please) ? :

500 character(s) maximum

24. Following COVID-19, how do you assess the following statements?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Revisions to the IED should very strongly contribute to the acceleration of the transition towards a green and digital economic recovery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding earmarked for the "Green Deal" and for the EU's transition to a zero-pollution economy by 2050 should not be diverted to continue the "business as usual" trend regarding agro-industrial plants as part of the EU's response to COVID-19	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

25. Whilst maintaining the effectiveness of the IED/EPRTTR legislation, would you see any possibilities to reduce costs? :

500 character(s) maximum

26. What is your view on the capacity of the IED and EPRTTR to ensure a level playing field and fair competition?

500 character(s) maximum

Any other comments

Please include any further information that would be useful for the ongoing impact assessments of the Industrial Emissions Directive (IED) or E-PRTR Regulation. In particular, please provide public references to relevant studies, position papers, and case studies or alternatively, please upload relevant documents. If you have already uploaded such a document as part of consultation activities undertaken for the reviews of the IED or the E-PRTR Regulation, please do NOT upload the same document again here.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed [IOGP Key messages document](#)

If you are familiar with the IED and its implementation, or the E-PRTR, please indicate if you are happy to be contacted to participate in targeted consultation activities.

- [YES, please include me / my organisation in the targeted consultation activities on revision of the IED](#)
- [YES, please include me / my organisation in the targeted consultation activities on revision of the E-PRTR](#)

In particular, if you have any further information that you believe would be useful for this impact assessment, please respond to the subsequent Targeted Stakeholder Survey that will also be conducted for this study. The targeted survey offers the opportunity to provide public references/documents for relevant studies.

On behalf of the DG Environment IED Team, thank you very much for your contribution to this Consultation!

If you have any questions, please contact the European Commission at this dedicated email address: **ENV-IED-REVISION@ec.europa.eu**