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Spanish experience with the BAT info exchange

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EXPECTATIONS OF IPPC AND BAT

SPANISH EXPERIENCE WITH THE BAT INFO EXCHANGE



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Difficulties in the IPPC implementation process in SPAIN

Constitutional

- ✓ **decentralised system of government: IPPC site-specific approach > different conditions from one site to the next**

Administrative

- ✓ **a system of 'co-ordinated pollution control' in which separate organisations are involved has to be implemented (fear of loss of power)**



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Difficulties in the IPPC implementation process in SPAIN

Technical

- ✓ **Medium-specific controls for air, water and waste are currently applied. Dramatic modification to implement IPPC is required**
- ✓ **suitable expertise for permitting/control authorities is needed**



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The BAT Concept (art.2 IPPC)

BEST

- ✓ **protection of the environment as a whole**

AVAILABLE

- ✓ **economically and technically viable**
- ✓ **cost and advantages**

TECHNIQUES

- ✓ **technology + design, construction, maintenance, operation and decommissioning**



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BAT Info Exchange

- ✓ **Required by Directive (art. 16.2)**
- ✓ **purpose to support competent authorities**
- ✓ **published BAT Reference Documents (BREFs) for each sector**
- ✓ **players: DG XI, IPPCB, IEF, TWGs**
- ✓ **must be taken into account by competent authorities**



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TECHNOLOGICAL IMPLICATIONS OF IPPC DIRECTIVE IN SPAIN

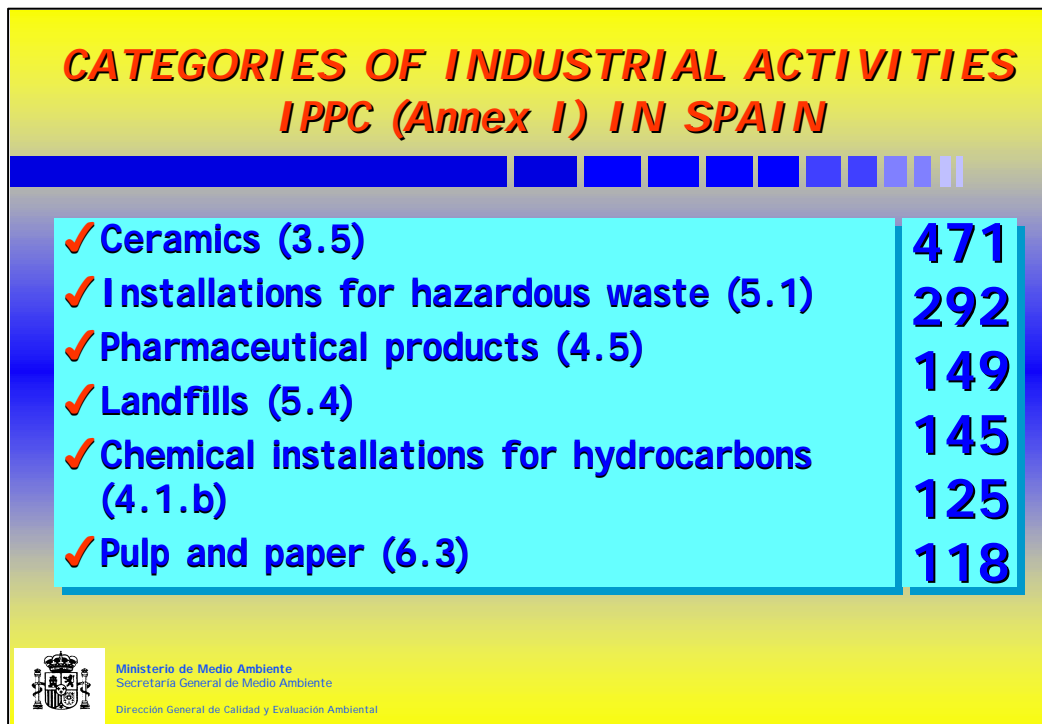
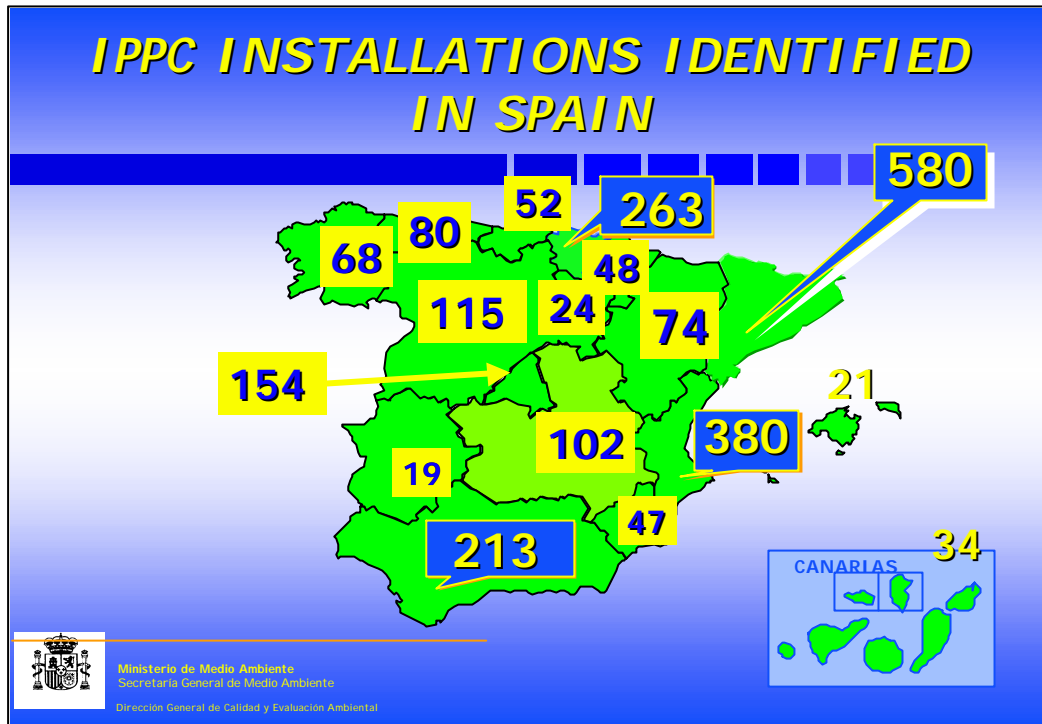
- ✓ **Number of installations covered by
IPPC:**

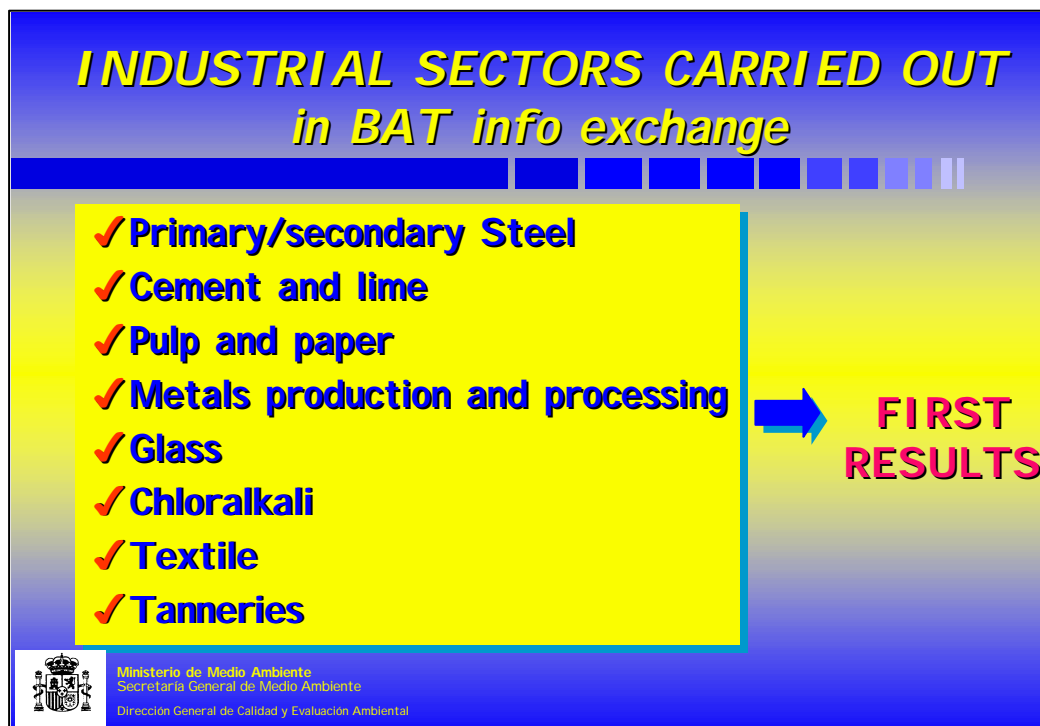
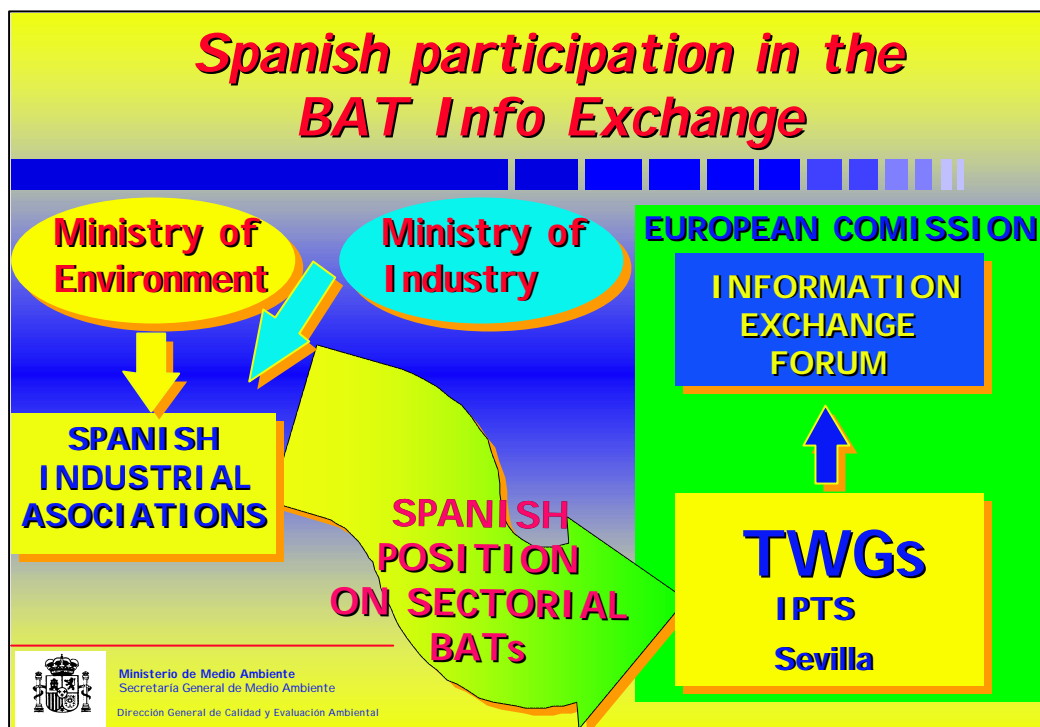
about 2.800

- ✓ **Uneven geographical distribution**
- ✓ **Identification of main industrial
activities affected**



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Spanish Technological Studies

- ✓ Production and Processing of ferrous metals /Foundries
- ✓ Surface treatment of metals and plastic materials
- ✓ Cement and lime
- ✓ Glass
- ✓ Ceramics
- ✓ Textile
- ✓ Surface treatments using organic solvents


Inputs to the BAT Info Exchange



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VOLUNTARY AGREEMENTS

- ✓ Chloralkali (1999)
- ✓ Pulp and paper (2000)
- ✓ Cement and lime (negotiation)
- ✓ Glass (early negotiation)



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PRELIMINAR CONCLUSIONS

- ✓ Active participation of industry: raising environmental awareness/opening to public
- ✓ industry know new environment legislation in advance
- ✓ Spanish industry representatives, working together with representatives from the European industry
- ✓ big effort is being made to know current and achievable environmental performance in industrial sectors



PRELIMINAR CONCLUSIONS *weak points (1)*

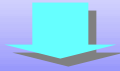
- ✓ Insufficient consideration to the economic aspects when determining BAT (size, price of energy, raw materials)
- ✓ Difficulties to define a methodology for cross media aspects assessment at sector and at local level



PRELIMINAR CONCLUSIONS

weak points (2)

- ✓ **concern that the associated emission levels in BREFs will be considered as prescriptive ELVs resulting in a **hide transfer of environmental technology****
- ✓ **partial translation of BREFs will not reflect the actual info exchange**



National Guidance notes are needed

