

European Conference on “The Sevilla Process:  
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# **Expectations of the chemical industry faced to the BREF process**

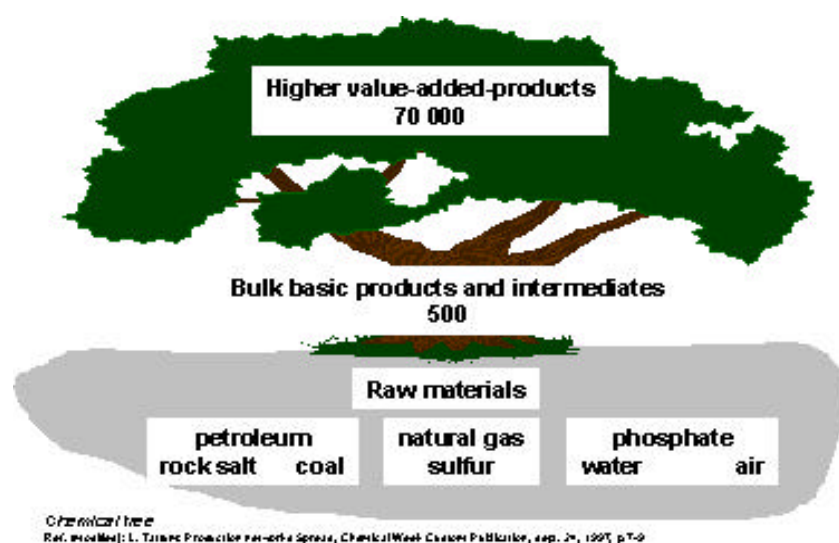
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## 1 The chemical industry in Europe

Before elaborating on the expectations of the Chemical Industry in relation to the BREF process, one needs to understand the scope and the significance of the Chemical Industry in Europe. The Chemical Industry produces some 500 basic chemical building blocks from raw materials such as petroleum products, natural gas and minerals. These building blocks form the basis of a very diverse industry that produces a myriad of a high value added products: polymers, fine chemicals, pharmaceuticals, agricultural chemicals, paints and varnishes, fibers, etc. , products that have enabled scores of new development and that help sustain 6 billion people on our planet. In economic terms, 30 % of the worldwide chemicals production is made in the EU, representing a turnover of 385 billion €. 36 thousand companies are grouped together in the Industry's European Trade Organization (CEFIC), representing employment for 1.7 million people in the Union. That is without taking account of indirect employment with service industries, engineering offices, equipment suppliers, etc. It is thus fair to say that a modern European economy without chemical industry simply would not be possible.

Fig. 1 - The structure of the chemical industry



## 2 What is at stake ?

The Chemical Industry is fully committed to providing a high level of environmental protection. This is in fact an integral element of the Responsible Care program, implemented by the European Chemical Industry since the early nineties. The overall expectation of the Chemical Industry in relation to the BREF process can be expressed very simply: to contribute to achieving a high level of environmental protection while maintaining the viability of the European Chemical Industry in today's global market.

How can we translate this objective towards the BREF process ? First of all, it means that, in line with the definition of BAT in the Directive, the economic aspects of BAT need to be considered. Incremental investment for a specific technique needs to be in balance with the resulting environmental benefits. The VITO conference in February this year has demonstrated that there is no simple and generally accepted method to determine this balance. Let me just remind you here that when costs are taken into account, full installation and operating costs should be considered, not just the list price of equipment. There may also be significant cost differences for retrofitting technologies in an existing facility versus installing them in a new plant. Another challenge is that Chemical Industry BREFs must be applicable to small installations as well as to large integrated chemical complexes.

Finally we should remember that the BREFs are intended to be guidance documents. Ultimately local conditions must be taken into account to assess environmental benefits and determine appropriate emission limits. This then will allow the chemical producer to select the best technologies and techniques. BREFs should in other words be practical reference documents with added value that get the local regulator and the industrial applicant on the same page.

### **3 Practical considerations**

Some practical elements to be considered in the BREF development process:

- the documents must remain descriptive documents - they should not become prescriptive;
- the scope of each BREF should be clearly defined; the Chemical Industry is a complex industry and there is a risk of overlapping between the different Chemical BREFs. This should obviously be avoided;
- it is particularly important to avoid overlap between sector BREFs and horizontal BREFs; the vertical BREFs should be strictly limited to sector or process specific information in those areas that are covered by a horizontal BREF to avoid providing confusing or conflicting information;
- while the Directive mandates consideration of the risk of accidents, care should be taken that the BREFs do not go into too much detail in this respect and start duplicating safety report information covered by the Seveso Directive;
- the selection of BAT for a specific industry should be based on practical application and demonstrated performance of a technique within that specific industry. It is indeed not always possible to simply transfer a technology from one industry to another;
- it should be recognized that in most cases performance will have to be described by a range, rather than a fixed number;

- multimedia effects need to be handled carefully. Sometimes emission or impact to one medium must be balanced versus an impact to another medium. Local conditions may determine the relative importance of each environmental impact;
- confidentiality of information must be dealt with appropriately. As competitors we are not free to share all details of our operations. This is particularly true for some source reduction techniques which may be embedded in confidential know-how.

The BREF process is not a simple exercise. But good quality BREFs are of key importance and we must be prepared to provide the necessary time and resources to accomplish this goal.

## **4 Summary**

So what does the Chemical Industry expect of the BREF process: we expect constructive cooperation and dialogue between regulators, the scientific and engineering communities and the chemical industry that will result in practical BREF documents. Practical BREF documents will contribute to our dual ambition of good environmental performance and a sustainable Chemical Industry in Europe.