CETS Position on the STM BREF Review

Dear colleagues,
CETS identifies five critical issues in the STM BREF review:

- reliable specific indicators;
- harmonised controls and site inspections;
- representative data;
- sound regulatory principles;
- and a robust review process with sufficiently specific technical recommendations.

1. Specific indicators must reliably describe the wide variety of installations

Some operators can reliably determine treated surface area and use specific indicators to improve resource efficiency. For many SMEs, bulk or complex components, changing product mixes and incomplete information prevent consistent measurement or estimation. Without harmonised definitions and calculation methods, indicators expressed per unit of surface or another reference quantity may be unsuitable for sector-wide requirements. Even small installations can readily exceed the 30 m^3 treatment-vat threshold, thus making not possible for a wide number of companies to make the specific evaluation

2. Harmonisation of controls and site inspections

Sampling points, frequencies and measurement methods differ considerably across Europe. Monitoring, controls and site inspections need a common basis for comparable assessment.

3. Representativeness of data

Data must represent comparable processes and operating conditions. Very low emission values may reflect substances not used in a process, rather than effective abatement. Small samples and incomplete SME participation limit representativeness; national or process-specific results cannot automatically represent the European sector.
CETS calls on the JRC to ensure that contributions from Member States and other TWG participants are assessed for accuracy, completeness and context, and that identified errors are corrected before the findings are used to justify binding requirements.

4. Basic principles of every regulation

Requirements must be clear, measurable, reasonable and proportionate. Additional obligations need a stated environmental purpose and evidential basis. BAT-associated environmental performance levels should remain indicative unless representative data, comparable processes and harmonised measurement methods support binding use. National frameworks and documented installation circumstances must be considered. Existing monitoring data should be used before requesting further information.

VAT nr.: BE 0827.987.545
Bank: ING Belgium, Naamsesteenweg 121, BE-3001 Leuven
Bank Account: 363-0760532-92 & IBAN: BE12 3630 7605 3292 & BICC: BBRUBEBB

CETS aisbl
c/o VOM Belgie
Kapeldreef 60
BE-3001
Leuven

T: +32 (0)16 40 14 20
F: +32 (0)16 29 83 19
E: info@cets-eu.be
www.cets-eu.be

5. Remarks on the STM BREF process as a whole

Each binding requirement needs a transparent basis distinguishing verified evidence from expert judgement. Numerical values require documented derivation, statistical methods and demonstrated statistical robustness. The associated uncertainty must be quantified and explicitly reported. BAT recommendations must specify achievable performance, applicability and limitations: a treatment or abatement technique may be feasible in some installations but unsuitable in others. These issues must be addressed before conclusions become mandatory, to avoid inconsistent permitting and technically unachievable obligations.

CETS and its national associations remain ready to contribute to a process that produces environmental requirements that are clear, measurable, reasonable and capable of consistent application across Europe.

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