

Consultation on the revision of the Industrial Emissions Directive (IED)

Attachment to the questionnaire

France Industrie highlights that the IED provides an **efficient legislative framework**. It has proven to be effective in reducing industrial emissions through a technical and participatory process involving the industry and other stakeholders. While improvements can be made, there is **no emergency to review it**. We would support a **limited revision** that maintains consistency with other Regulations.

In addition, the IED would benefit from being implemented in a **more harmonized manner among Member States**.

More specifically, the Commission would consider **lowering the capacity thresholds** to include facilities "just below current thresholds". They would imply time limits that are particularly restricted for specific types of facilities, subject to other national notification and authorization constraints. Such lower thresholds would impose significant additional costs on some operators in terms of human and financial resources, and subsequently **could create overlaps with other EU regulatory texts** (like: Medium Combustion Plant Directive – MCPD). For these reasons, France Industrie does not support lowering the capacity thresholds of Annex 1 of the Directive. In addition, extension to new sectors should be carefully analysed, in particular by a cost-benefit analysis considering *i.a.* the measures and political frameworks in place to address them.

The **current system for drawing up BREFs (the Seville process) must be maintained**: the presence of amongst others industrial experts is an essential condition for the effectiveness and efficiency of this directive. This system makes it possible, in particular, to adapt changes in the light of the technical and economic considerations within each industrial sector at stake.

The IED mechanism can already be used to contribute to the **objectives of circular economy and energy efficiency**. We call to keep on addressing of such objectives in sectoral BREFs rather than cross-cutting BREFs.

Concerning the potential inclusion of provisions for the **decarbonation of industry** in the IED, many IED installations are already regulated under other schemes, both at European and national level. Overlapping should be prevented in order to preserve the most effective decarbonation schemes, in particular for installations already covered by EU ETS. IED article 9.1 should remain as it stands.

We recall that the **general principle of informing the broader public** and the need not to restrict the dissemination of useful information must neither undermine safety issues, nor the protection against unfair competition and malicious acts.

France Industrie is the trade association representing French manufacturing industry. It brings together 25 sectoral industry federations and the Presidents of 44 major private and public companies operating in all industrial sectors. France Industrie is the reference point for the public authorities on all cross-cutting issues relating to industry: competitiveness, employment, ecological transition, innovation and digital, European industrial policy and the attractiveness of the regions.