

## Analysis of European Commission proposal for WGC BREF

Results from the EU and AT, BE, DE, ES, FR, IT, NL (based on the Draft 1 proposal proposed to the Final WGC BREF meeting and supplied data)

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- Dust (mass flow threshold proposed 100g/h “clean gas”): at EU level, 93% of the emission points (EP) = 1047 would be exempted from the BAT-AELs. Just 56 of the 1121 EPs would have to do any effort. For some countries this would mean a 100% exemption rate (BE, NL), 99% for Spain, 96% DE +IT 96%, AT 87%, and FR 73%. The alternative proposal (raw gas) will bring the EU wide exemption down to 49%. If the (raw gas) with a threshold cut to 20g/h (meaning factor 5 cut) Proposal 3 would be retained, that would still mean that already 73%! of the EPs do comply with the higher BAT-AEL range, and thus would not have a problem with this.
- TVOC (mass flow threshold proposed at 200g/h “clean gas”): at EU level, 80% of the emission points (EP) = 422 would be exempted from the BAT-AELs. Just 84 of the 528 EPs would have to do any effort. For some countries this would mean a 91% exemption rate (AT), followed by NL (88%), IT (87%), DE (86%), ES (80%), BE+FR (57%). The alternative proposal (raw gas) will bring the EU wide exemption down to 28%. If the (raw gas) with a threshold cut to 10g/h (meaning factor 20 cut) Proposal 3 would be retained, that would still mean that 35% of the EPs would be exempted from the BAT-AEL range.
- TVOC (containing CMR1 A/B) (mass flow threshold proposed 2.5g/h “clean gas”) : at EU level 39% of the emission points (EP) = 250 would be exempted from the BAT-AELs. For some countries this would mean an exemption rate that can go up to 65% (ES), followed by IT (59%), DE (58%), NL (56%), BE (33%) and FR (14%). The alternative proposal (raw gas) will bring the EU wide exemption down to 17%. Extra effort for the industry will be modest however even with that proposal (from 0% for AT and FR) up to 49% for Spain. If the Option 2 proposal would be retained (raw gas) without a threshold, all the emission points will be regulated. However, it needs to be kept in mind that even without those thresholds, the compliance threshold will be at 49% in the EU and can be as high as 83% (AT). Other checked countries: IT (66%), DE (53%), NL (50%); BE+FR 43%, ES 32%.
- *Ethylene Oxide, Propylene Oxide and Trichloromethane (mass flow threshold proposed 2.5g/h “clean gas”)*: The current Commission Proposal would mean that 100% of all the EPs would be exempted, undermining the set BAT-AELs completely.