

CIELFFA

**COMITÉ INTERNATIONAL
D'ÉTUDE DU LAMINAGE À FROID
DU FEUILLARD D'ACIER**

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Statement of the European Cold Rolling Industry on the EU Industrial Emissions Directive (IED)

The European Commission recently presented the proposal to amend the EU Industrial Emissions Directive (IED). The IED regulates the authorisation and operation of industrial installations in Europe by stipulating mandatory emission reduction requirements for these plants.

The European cold rolling industry promotes the goals of the existing IED with its ambitious and clear regulations for the licensing and operation of industrial plants. It applies the Best Available Techniques (BAT) based on the IED, in order to provide the required environmental performance and its contribution to the protection of people and the environment from harmful effects.

The present regulatory proposal stipulates an extension of the scope and extensive new requirements for the operators of industrial plants. Among others, the inclusion of cold rolling mills in Annex I is planned. However, the IED and their significant obligations apply to installations because they are particularly emitting or polluting.

Cold rolling mills do not meet the criteria to be classified as "particularly emitting or polluting"

No relevant emissions arise from cold rolling mills and they do not cause any particular adverse environmental effects. The data collection on cold rolling mills in the context of the revision of the BREF Steel Processing shows that emissions from cold rolling mills are significantly lower compared to other IED installations. IED requirements for cold rolling mills would therefore not be proportionate in relation to the environmental benefit.

Above all the Commission's assessment that cold rolling mills can be classified as "particularly emitting or polluting" due to their associated pickling processes fails. Environmentally relevant pickling plants are already classified as IED plants (Annex I, point 2.6) and do not need to be included as associated plants in Annex I of the IED again.

Introduction of chemical management system is disproportionate and leads to redundant regulation

The new, extended requirements in Art. 14 for approval procedures and for the operation of industrial plants, e.g. the required introduction of a chemical management system, are clearly oversized for cold rolling mills. With the exception of the already registered pickling plants, no chemicals are used to any relevant extent in cold rolling mills. In larger companies, an environmental management system

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according to ISO 14001 has long been standard. The introduction of a chemicals management system would lead to redundant regulations. For all potentially hazardous substances, a substitution obligation is already implied by the Directive 98/24/EC. For substances subject to authorisation, the REACH Regulation applies and provides for a comprehensive examination of alternatives as part of the authorisation procedure. The examination of alternatives is thus already sufficiently regulated.

Strictest possible emission limit values overburden plant operators and endangers existence of entire company sites

The new Article 15 No. 3 stipulates emission limit values at the lower limit of the BAT-AEL (Associated Emission Levels) range. They do not represent the state of the art and can currently not be met by most plants and for every process. Such a requirement would make a conversion of the entire installations necessary and is therefore technically and economically unfeasible for the European cold rolling industry. Consequently, it endangers the existence of entire company sites. BAT-AEPL (Environmental Performance Limit Values) should continue to be non-binding because they are only feasible to a very limited extent due to conflicting goals in plant operation (e.g. between energy efficiency and emission prevention). Particularly, consumption values in the steel and metal processing industry depend to a large extent on the product or process.

We strongly oppose the inclusion of cold rolling mills in the scope of the IED. There are no significant adverse environmental impacts from this industry. The inclusion of our small and medium-sized cold rolling companies in the IED would therefore not bring any substantial environmental benefits. The European cold rolling industry would rather be burdened with unnecessary double regulation and bureaucracy.

Kind regards

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