



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME position paper regarding the proposal for an Industrial Emissions Directive

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Introduction

UEAPME represents more than 12 million SME enterprises, which employ around 55 million people across Europe.

The existing and the proposed legislation on industrial emissions can, in particular in terms of certain activities in the field of solvents emissions, waste incineration but also of Annex I affect smaller enterprises.

We welcomed the proposals made by the European Commission in December 2007 to clarify some aspects of the existing legal provisions and to provide more flexibility for the competent authorities. Thus unnecessary administrative burdens, which often weigh on small and medium sized enterprises still much more than on larger firms, can be reduced or avoided. In our opinion, however, that flexibility should be further increased. Thereby the high level of the protection of the environment and human health would be maintained.

In any event the European Parliament and the Council are asked to avoid the introduction of additional unnecessary bureaucratic requirements for operators.

Therefore UEAPME calls on the Environment Committee of the European Parliament:

- **Avoid the introduction of too much additional reporting bureaucracy**

The timeframe for the reporting frequency pursuant to the proposed Article 8 must be extended and there should be exemptions for certain types of activities as in the current legal framework. The content of the reporting on the BAT implementation in the installation (proposed Article 24) should be restricted.

Thus Amendments 13, 127 and 257 should be supported.

- **Concentrate on likely groundwater and soil contamination risks**

The administrative burdens of the proposed additional soil monitoring must be targeted to likely dangers for groundwater and soil. Therefore the relevance of dangerous substances and their amount used by an activity covered by Chapter II should be taken into account. If monitoring then seems necessary an extended timeframe would provide more flexibility and allow having regard to the nature of the activity concerned.

So Amendments 168, 169 and 212 and 213 should be supported.

- **Simplify the monitoring requirements for smaller waste (co-)incineration plants**

The current waste incineration directive, covering also very small incineration plants, contains a very prescriptive framework for emissions monitoring. The Commission has made proposals to provide more flexibility, in particular for smaller plants, when the compliance with emission limitations can be predicted. Such a relief would help in particular smaller enterprises and still ensure a high level of environmental and health protection. A few additional safeguards seem acceptable.

Thus Amendments 511, 512, 517 and 518 should be supported while 507 - 510 and in particular Amendments 513 to 516 should not be adopted.

Brussels, November 2008.