

# IED Article 13 forum meeting of 19-20 December 2017

## Proposed modifications to the standard texts for BAT conclusions

### GENERAL BAT CONCLUSIONS

[THE TEXT THAT FOLLOWS IS TO BE INSERTED WITHIN THE BAT CONCLUSIONS CHAPTER]

*[Note to the TWG: the following text on environmental management systems (EMS) is based on standard text agreed at the level of the IED Article 13 Forum; the possibilities for changes are therefore limited]*

### ENVIRONMENTAL MANAGEMENT SYSTEMS

**BAT x:** In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features (e.g. **EU Eco-Management and Audit Scheme**):

- i. commitment and leadership of the management, including senior management to the implementation of an effective EMS;
- ii. definition, by the management, of an environmental policy, developed by management, that includes the continuous improvement of the environmental performance of the installation;
- iii. a preliminary analysis that includes the determination of the organisation's context, the identification of the needs and expectations of interested parties, the identification of the significant environmental aspects of the installation and the risks associated with such aspects as well as the applicable legal requirements relating to the environment;
- ~~iii.~~
- iv. establishing environmental objectives, and appropriate indicators, in relation to significant environmental aspects, including on safeguarding compliance with applicable legal requirements;
- v. planning, and establishing and implementing the necessary procedures, objectives procedures, and targets actions, in conjunction with (including financial planning and investment) to achieve the (environmental) objectives;
- vi. determination and provision of the required resources,
- ~~iv.~~ implementation of procedures, paying particular attention to:
  - ~~(a)~~ structure and responsibility in relation to environmental aspects and objectives;
  - ~~(b)~~
- vii. carrying out recruitment, training and other activities to ensure the expected level of awareness, and competence and involvement of staff at all levels;
- ~~(c)~~
- viii. definition of internal and external communication processes in relation to environmental aspects;
  - ~~(d)~~ employee involvement;
- ix. ~~(e)~~ documentation record keeping of relevant documentation and information;
- x. ~~(f)~~ effective operational planning and process control;
- xi. ~~(g)~~ implementation of appropriate maintenance programmes;
- xii. ~~(h)~~ paying particular attention to emergency preparedness and response;
- ~~(i)~~ safeguarding compliance with environmental legislation;

- xiii. (re)designing a (new) installation or a part thereof considering the environmental impacts throughout its service life, including from its eventual decommissioning;
- v. ~~checking performance and taking preventive and corrective action, paying particular attention to:~~
- xiv. (a) **implementation of monitoring and measurement** (see also the Reference Report on Monitoring of Emissions to Air and Water from IED Installations – ROM);
- xv. **application of sectoral benchmarking on a regular basis;**
  - (b) ~~corrective and preventive action;~~
  - (c) ~~maintenance of records;~~
- xvi. (d) **independent (where practicable), periodic, internal and external auditing in order to monitor and assess the environmental performance and compliance obligations and to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;**
- xvii. **evaluation of causes for nonconformities, implementation of corrective actions in response to nonconformities, review of the effectiveness of corrective actions, and determination of whether similar non-conformities exist or could potentially occur;**
- xviii. **review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness;**
- xix. **following and taking into account the development of cleaner technologies;**
- viii. ~~consideration of the environmental impacts from the eventual decommissioning of the installation at the stage of designing a new plant, and throughout its operating life;~~
- ix. ~~application of sectoral benchmarking on a regular basis.~~
- x. ~~[Author: add type of management plan, if relevant, e.g. noise, odour, waste] management plan (see BAT [number]).~~

Specifically for [the industry sector], **BAT** it is also important to consider the following potential features of **to incorporate the following features to the EMS:**

[Author: please include other appropriate features here, if needed.

e.g. energy management plan (see BAT XX); noise management plan (see BAT XY); odour management plan (see BAT YY); inventories of waste water and waste gas streams (see BAT ZZ);

If this is not the case, please remove this paragraph.]

### **Applicability**

The scope (e.g. level of details) and nature of the EMS (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have.

**BAT y: BAT is to monitor emissions to air/water with at least the frequency given below and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.**

Substance/Parameter	Standard(s) ( <sup>1</sup> )	Minimum monitoring frequency	Monitoring associated with
[e.g. NO <sub>x</sub> ]	[e.g. CEN XXXX]	[e.g. continuous, once every month]	[Author: add reference to the BAT number(s)]
<sup>(1)</sup> This should be read to include all subsequent amendments and replacement of standards.			