

Industrial Emissions Directive (IED) EFIEES key points for the Trilogue

EFIEES, the European Federation of Intelligent Energy Efficiency Services, is the voice of private energy service companies (ESCOs) and their national associations across Europe. Our members represent over 100.000 professionals committed to the design and implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.

The EU negotiators are starting the last negotiation step, with the first trilogue on 5th October. EFIEES calls their attention on some key points, to ensure a viable and effective framework for industrial installations permitting, combining feasibility on the ground and environmental protection.

Among most important points, the **integrated approach** allowing the best overall environmental performance in industries must be kept, as it was the case in the historical IED design, with **emission limit values** chosen in a range of values, taking into consideration local conditions and **cross-media effects**.

Environmental performance levels should be **indicative**, not binding. Such parameters are a new proposed regulatory concept, and they are not yet defined. It would be premature to make them compulsory without prior detailed assessment, definition, with exact figures for each specific environmental performance level. Industries need visibility and predictability.

Transformation Plans should be **indicative**. They can be a useful tool to prepare for long term adaptations of industrial facilities, for a sustainable, clean, climate-neutral economy. They also have the potential to incite for innovation. But to be useful, such plans should remain flexible, and be designed in a way that allows them to be dynamic, adaptable over time and depending upon each industry's challenges.

As a last key point, when considering compensation and penalties in case of permits violations leading to environmental or health damages, EFIEES calls for a **fair and balanced legal mechanism**, based on **the following existing principles**: fines should be proportionate to the size of the installation and to the extent of the damage caused, without reverting the burden of the proof.

About EFIEES

The purpose of the *European Federation of Intelligent Energy Efficiency Services* is to promote the activities of Energy Services Companies (ESCOs) in the European Union. ESCOs design and implement practical measures to improve the energy efficiency of their customers by means of long-term contracts. Their objective is to optimise the energy management for end-users. Find more on www.efiees.eu