

June 5 – 7
Laulasmaa
Estonia

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Implementation of the SA BREF

Join at [slido.com #3705809](https://www.slido.com/join/3705809)

Implementation of the SA BREF

*European Fishmeal and Fish Oil Members Conference
Birgitte Kjær
Danish Agriculture and Food Council
6 June 2024*

Landbrug & Fødevarer



Revision of directive on Industrial Emissions

- Regulating emissions of pollutants from industrial installations
- Around 52,000 installations in the EU covered – including fishmeal and fish oil production
- Sets the framework for environmental permits in EU
- The mother directive for setting specific requirements for sectors (BREF documents, BAT conclusions)
- The revised directive is expected to enter into force in July 2024. Implementation deadline May 2026



Major achievements - overview

Promoting innovation and transformation

- Creation of INCITE
- Targeted permitting flexibilities
- Transformation plans
- Deep industrial transformation

More effective legislation

- Emission limits in permits reflecting best performance of BAT
- Harmonised compliance checks
- Strengthened enforcement
- Streamlining & digitalisation

New and stronger tools for resource efficiency, circular economy and use of less toxic chemicals

- Binding performance levels
- Mandatory Environmental Management System
- Substitution of hazardous chemicals

Enhanced Aarhus rights

- Stronger focus on human health protection
- Right to seek compensation for damages
- Upgraded public information, participation and access to justice

Widening of IED scope

- Mining of metals and production of batteries
- Higher coverage of pig and poultry farms
- Adoption of BAT for waste landfills



New requirements for environmental permits

- Mandatory certified environmental management systems
- Odour measurement mandatory in applications
- Tightening the determination of limit values (use the whole range) for emissions
- Mandatory management plan for chemicals
- Binding requirements for the use of water, energy etc.
- Entry into force of some requirements only after the next round of BAT conclusions or after 12 years at the latest



New Industrial Emission Portal

- **Purpose:** to provide the public with information about specific installations' pollution of the environment
- Replaces current reporting in PRTR regulation
- Current requirements for pollutants and waste quantities (If above threshold value). Reporting of “0” values
- **NEW REQUIREMENTS** for reporting resource consumption: water, energy, relevant raw materials
- First reporting under the new rules for data year 2027



Welcome to the European Industrial Emissions Portal

The website presents information on the largest industrial complexes in Europe, releases and transfers of regulated substances to environmental media, waste transfers as well as more detailed data on energy input and emissions for large combustion plants in EU Member States, Iceland, Liechtenstein, Norway, Serbia, Switzerland and the United Kingdom.

If you are new to this topic, please make sure that you [read our guide](#) on what to find in the portal. You can explore the data online, or [download](#) datasets and work with them in a software of your own preference.



ANALYSE
Find the biggest polluters and compare data across countries

DOWNLOAD
Work with raw datasheets on your own choice of software

ABOUT
New to this topic?
Understand the industry portal



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EFFOP conference Estonia June 2024

New BREF for the Fishmeal Industry in Europe

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Representing EFFOP in the Sevilla-process 2019-2023



Some terms...

- BREF: BAT Reference Document
Common minimum standards for emissions to be used all over Europe. Purpose: set a level playing field and raise environmental standards.
- BAT: Best Available Techniques
Techniques that set the standards. Other techniques may be used if they result in the same emissions.
- IED: Industrial Emissions Directive
The EU directive behind it all...



The Sevilla process

- Technical Working Group
States, Industries, NGOs. EU Commission Agency in Sevilla.
- Key Environmental Indicators
Defined by Commission and TWG.
- Data Collection
From “well performing” installations. Fishmeal Plants: 11
- Negotiating the new BREF
From data, but also from Commission’s opinion.



SA-BREF

- Slaughterhouses and Animal By-Products
Fishmeal and Fish Oil included.
- Defines 25 BATs
Relevant for Fishmeal: 21 BATs
- Management plans: 8
- Monitoring: 4
- Techniques: 11
- Emissions Levels: 4



Management Plans

- BAT 1: Environmental Management System
Obligatory, but not necessarily certified.
- Note for all management plans
“The level of detail and the degree of formalisation will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have.”



Monitoring Emissions

- More substances to measure and more frequent
AOX (Adsorbable organically bound halogens)
When burning malodorous gases: Dust, SO_x, NH₃, TVOC
Odour
- Note the footnotes!
- Start monitoring soon!



Techniques

- Few changes from the old BREF
- Note the footnotes and wording
 - Many described techniques are not mandatory.*
 - Many are not applicable for our sector.*



Emission levels

- Should be associated to the techniques
- Binding (except on energy and water consumption)
- Emission of N, P and COD
May not apply for seawater from Fishmeal and Fish Oil.
- Emission of NO_x from combustion malodorous gasses in boilers
Regulated by Directive on medium combustion plants.
- Emission of odour: 400 – 3500 OU_E
May not apply when combustion in thermal oxidisers or steam boilers.



Implementation

- BREF is binding for the states
- Implemented to the installations through Environmental Permits
- Local authorities must revise the permits
- Local authorities must set emission levels within the intervals in the BREF
- Must be implemented within 4 years – i.e. December 11th, 2027
Both the revised environmental permit and the techniques.



Some advices

- Read the text
<https://eur-lex.europa.eu/> Search for “2023/2749”
- Note the footnotes and wording!
- Keep contact with your local authorities
Probably they know even less about this than you do...
- Start measurements and implementation now
Don't wait on the authorities or the revised permit.