

AMENDMENTS 175 AND 250 ON THE INDUSTRIAL EMISSIONS DIRECTIVE (IED) REVISION – CEMBUREAU POSITION

July 2023

CEMBUREAU, the European Cement Association (www.cembureau.eu), supports the ongoing revision of the Industrial Emissions Directive (IED)¹. Each and every one of the 200-cement plant in the EU operates in accordance with a permit granted by the authorities in the Member States following the provisions of the IED.

In view of the plenary vote of the European Parliament, CEMBUREAU would like to share its strong concerns about the amendments 175 and 250. Both amendments aim to impose monitoring obligations on co-incineration plants during start-up and shut down phases. In our view, these amendments should not be supported for the following reasons:

- 1. Co-incineration is already strictly regulated under the IED and the amendments would bring no clear environmental benefits.**

The existing provisions of the Article 50 (4) of the IED clearly establish the operating conditions for using waste during co-incineration, including that waste shall not be fed at start-up and until the temperature has reached the required level for the effective destruction of dioxins and furans. Therefore, the amendments advocating for additional PCDD/F measurements during start-ups and/or shutdowns and/or other than normal operating conditions (OTNOC) are completely unjustified for the co-incineration of waste in the cement industry. In effect, they would bring a significant burden with no clear environmental benefits.

- 2. The proposed amendments are not aligned with the IED Best Available Techniques definition, the so called “Sevilla process”, in which best practices for co-incineration are elaborated for each sector.**

The proposed amendments are not in-line with the already published Best Available Techniques Reference document (BREF/BAT) for the Cement sector and suggest additional technical requirements and measurements for the waste co-incineration plants. The BREF/BAT document dedicated to the cement sector already includes strict provisions to prevent emissions of dioxins, furans and dioxin-like polychlorinated biphenyls (PCDD/F) and to keep the emissions of PCDD/F from the flue-gases of the kiln firing processes low. More specifically, the provision of the BAT 27(f) is to *“Stop co-incinerating waste for operations such as start-ups and/or shutdowns”* while the provision of the BAT 12(f) is to *“Delay or stop co-incinerating waste for operations such as start-ups and/or shutdowns when appropriate temperatures and residence times cannot be reached, as noted in a) to d) above.”*

CEMBUREAU firmly believes that any change of technical rules shall be thoroughly discussed and decided during the BREF/BAT revision process in the frame of the well-respected “Sevilla process”

¹ Please see CEMBUREAU [Position Paper](#) on the IED Revision, August 2022

(i.e., the information exchange set by the European IPPC Bureau within the Technical Working Group of representatives by authorities, industries and the NGOs.)

3. The proposed amendments do not make sense with regards to co-incineration within the cement kilns.

The proposed amendments fail to consider the fundamental differences between the incineration and the co-incineration installations, such as cement plants: while the incineration plants are dedicated to the thermal treatment of waste, the main purpose of the cement plants is the production of a product (cement), for which waste is used as a fuel. Specifically, the dioxins and furans emissions are effectively avoided within cement kilns thanks to:

- long retention time of the gases in the kiln system.
- high temperatures in the burning zone.
- the excess of air in the kiln burning conditions.
- the low chlorine levels, which is an essential component to produce dioxins and furans. Chlorine is restricted in the specifications of alternative fuels and is also an undesirable element for cement kiln operation because it can create process difficulties.
- the fast decrease of the temperature of the exhaust gases due their utilisation for drying raw materials and cooling, prevents the formation of complex organic molecules like dioxins.

4. The proposed amendments would be extremely difficult, if not impossible to implement in the cement kilns

The provisions described in the amendments 175 and 250 would be at best extremely difficult to implement in the cement sector. The European Standard EN 1948-1 "*Stationary source emissions - Determination of the mass concentration of PCDDs/PCDFs*" specifies the quality control requirements which shall be fulfilled for the sampling and measurement of dioxins and furans. According to the above EN standard a time period of 6 – 8 hours of sampling is required for obtaining acceptable data, when the operating conditions such as temperature, pressure and oxygen level shall be stable. However, this is actually impossible to be realized during the start-up/shut down conditions of the co-incineration installations, because the operating conditions of the cement kiln are under a transitional period and are not stable.

Moreover, amendment 250 refers to half-hourly average values, which is the approach well-established for the emissions measured on a continuous basis. On the contrary, dioxins and furans can only be measured on a spot basis, which makes **the calculation of half-hourly average values absolutely unapplicable**. Consequently, the implementation of amendments 175 and 250 would create a huge confusion between the operators and the authorities, since they are technically not feasible to be applied.

As a conclusion, CEMBUREAU is **strongly opposed to the amendments 175 and 250** which are unjustified and would create significant problems, endangering one of our key decarbonisation levers of the cement industry that is co-processing².

² <https://www.cembureau.eu/media/0kzm5zen/cembureau-what-is-co-processing-march2023.pdf>