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EEB's comments on the IEF Position Paper on improving the collection and submission of data for the review of the BREFs

- Information and data submitted by suppliers and drawn from both pilot plants and techniques operating in isolation should be acceptable.
- Where data on the performance of specific techniques is drawn from pilot plants, detailed information on the other techniques used in the process can be provided. In this case, the performance data can in some cases be taken as best performance and used to complement data from in situ use in existing installations, where the technique is likely to have been combined with other techniques - less than BAT. This data can also be used to develop recommendations about optimal operating conditions.
- Where data is taken from BAT operating in isolation, it can also be used to complement in situ data from producing installations and to draw conclusions regarding optimal performance.
- Both types of information can include data on sensitive issues such as residues/waste generation and energy consumption/generation - information that is difficult to obtain from producing installations due to its relevance to competitiveness.