



IED Inspection Planning

New BAT

Change of Permit

Acceptance Inspection

Risk based Inspections

Non-routine Inspections

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OECD, 2023-08-30

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Application of the IED

- Categories of activities:
 1. Energy industries
 2. Production and processing of metals
 3. Mineral industry
 4. Chemical industry
 5. Waste management
 6. Other activities
- Treatment of industrial wastewater is included



Transposition of new BAT Conclusions

Name	Code	Published	National Transposition
Iron and steel production	IS	03/2012	Admin. Regulation
Production of chlor-alkali	CAK	12/2013	Admin. Regulation
Waste water and waste gas in the chemical sector	CWW	06/2016	Regulation
Non-ferrous metals	NFM	06/2016	Admin. Regulation
Large volume organic chemicals	LVOC	12/2017	Admin. Regulation
Waste treatment	WT	08/2018	Admin. Regulation
Waste incineration	WI	12/2019	Regulation
Large combustion plants	LCP	12/2021	Regulation
Ferrous metal processing	FMP	11/2022	Still open
Waste gas in the chemical sector	WGC	12/2022	Still open



Change of the Permit

Application of BAT is part of the permit

- Permits of IED installations are unlimited in time
- The use of waterbodies is time limited
 - Sewage disposal
 - Abstraction of (ground)water

How to adapt an IED permit to new BAT?

- Regulation with new BAT
 - Directed to the operator
 - Operator must apply for change of the permit
- Administrative Regulation with new BAT
 - Directed to the competent authority
 - Change of permit by supplementary order



Application of BAT

- New permits:
 - New BAT must be fixed directly in new permits
- Already existing permits:
 - Transposition of new BAT within one year into German law (regulation or administrative regulation)
 - Application of the new German law within four years after publication of new BAT
- Inspection authority checks after every new BAT and at every inspection if the permit is up to date
- Acceptance inspection after every change of the permit

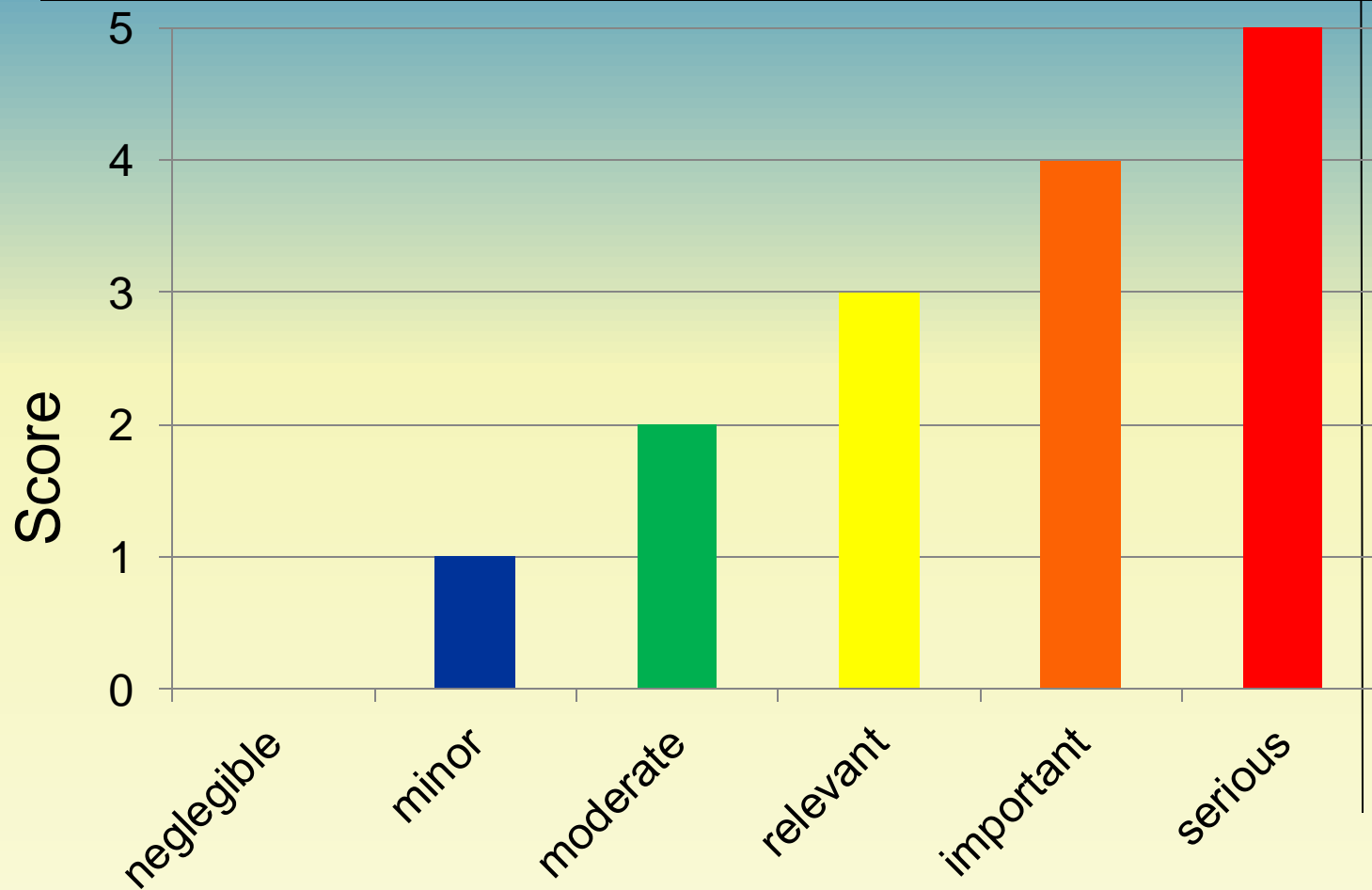


Environmental inspections

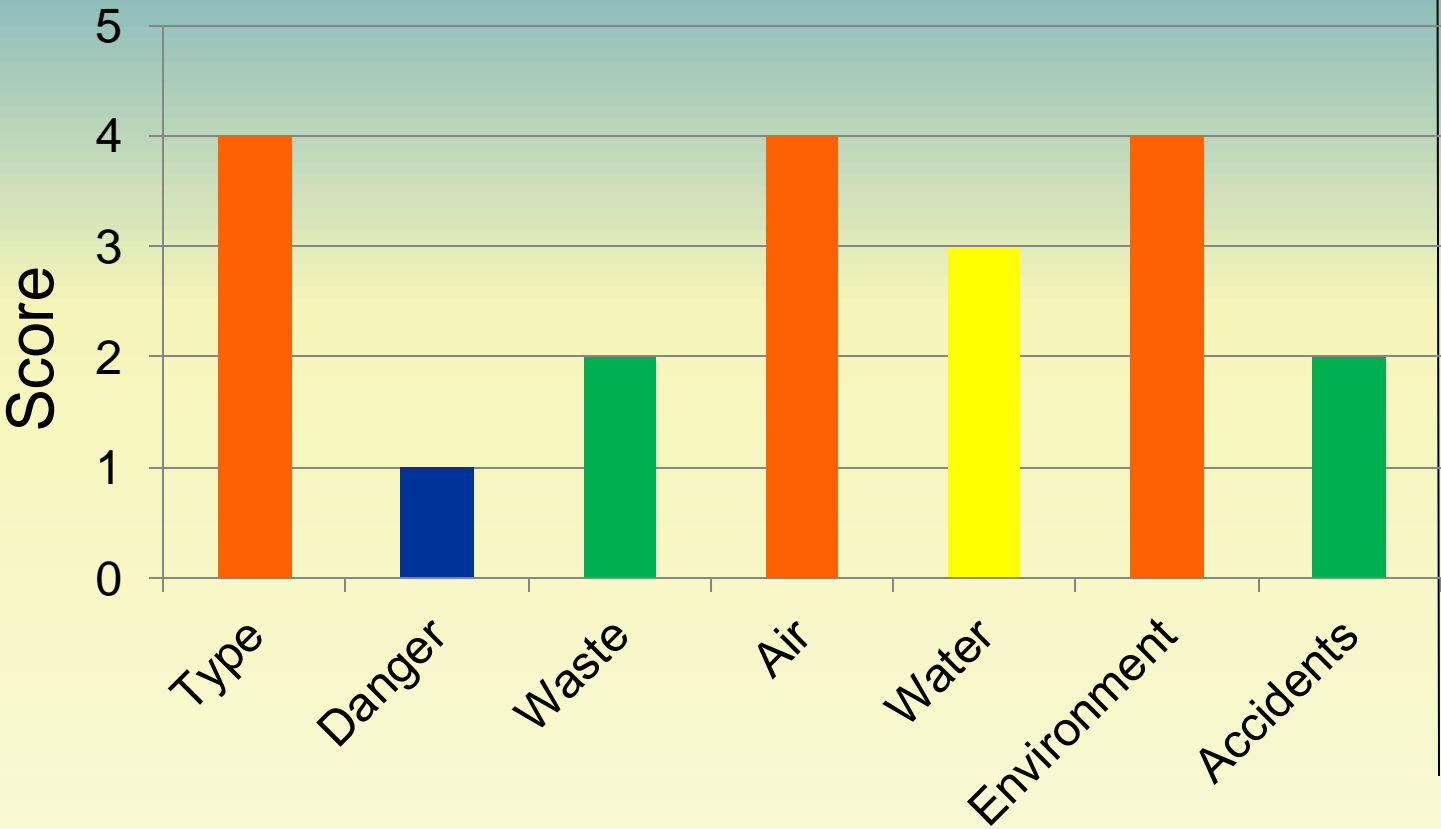
IED:

- Based on the inspection plans, the competent authority shall regularly draw up programmes for routine environmental inspections, **including the frequency of site visits for different types of installations**
- The period between two site visits shall be based on a systematic appraisal of the environmental risks of the installations concerned and shall not exceed **1 year** for installations posing the highest risks and **3 years** for installations posing the lowest risks.

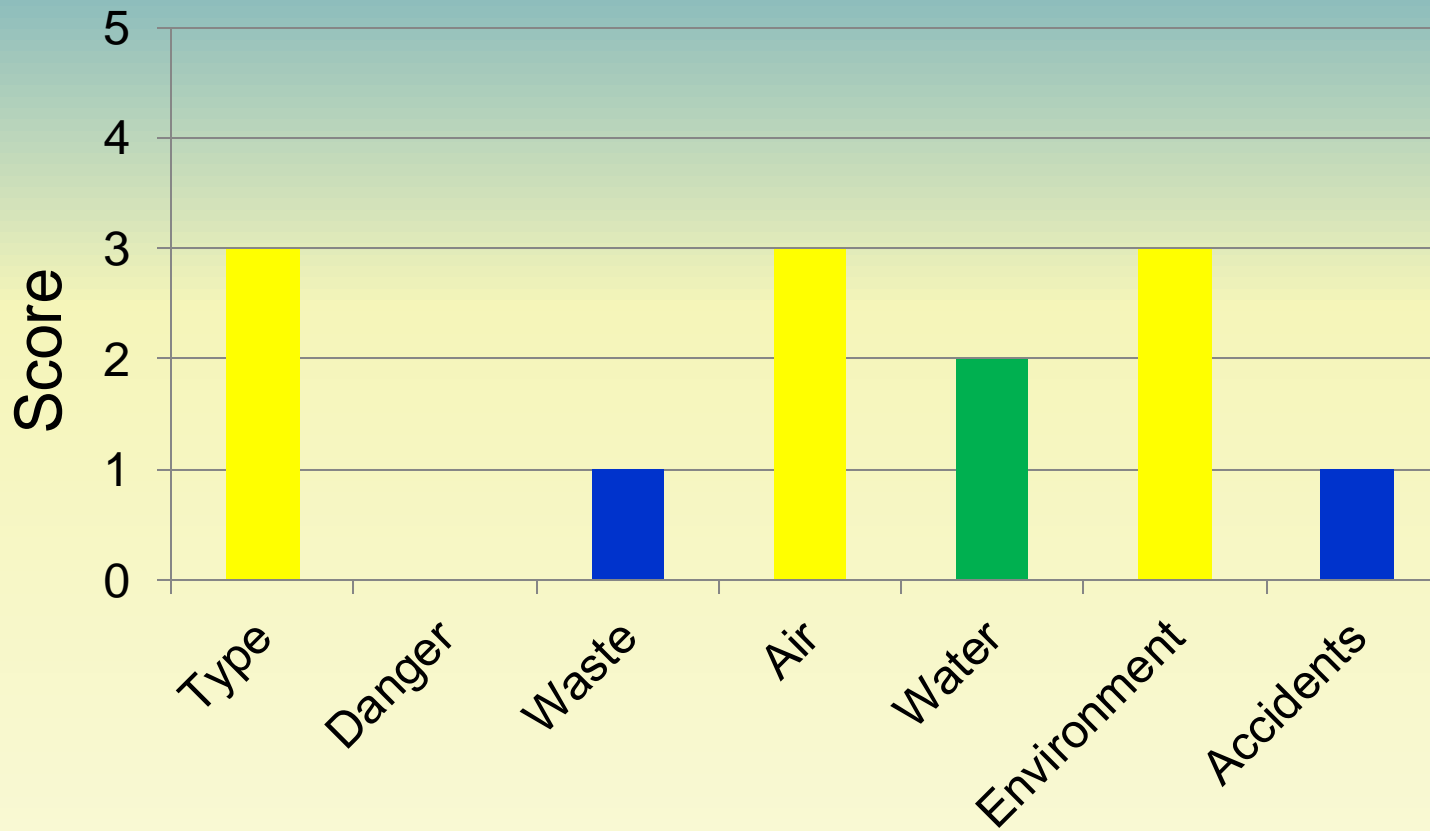
Impact on the Environment



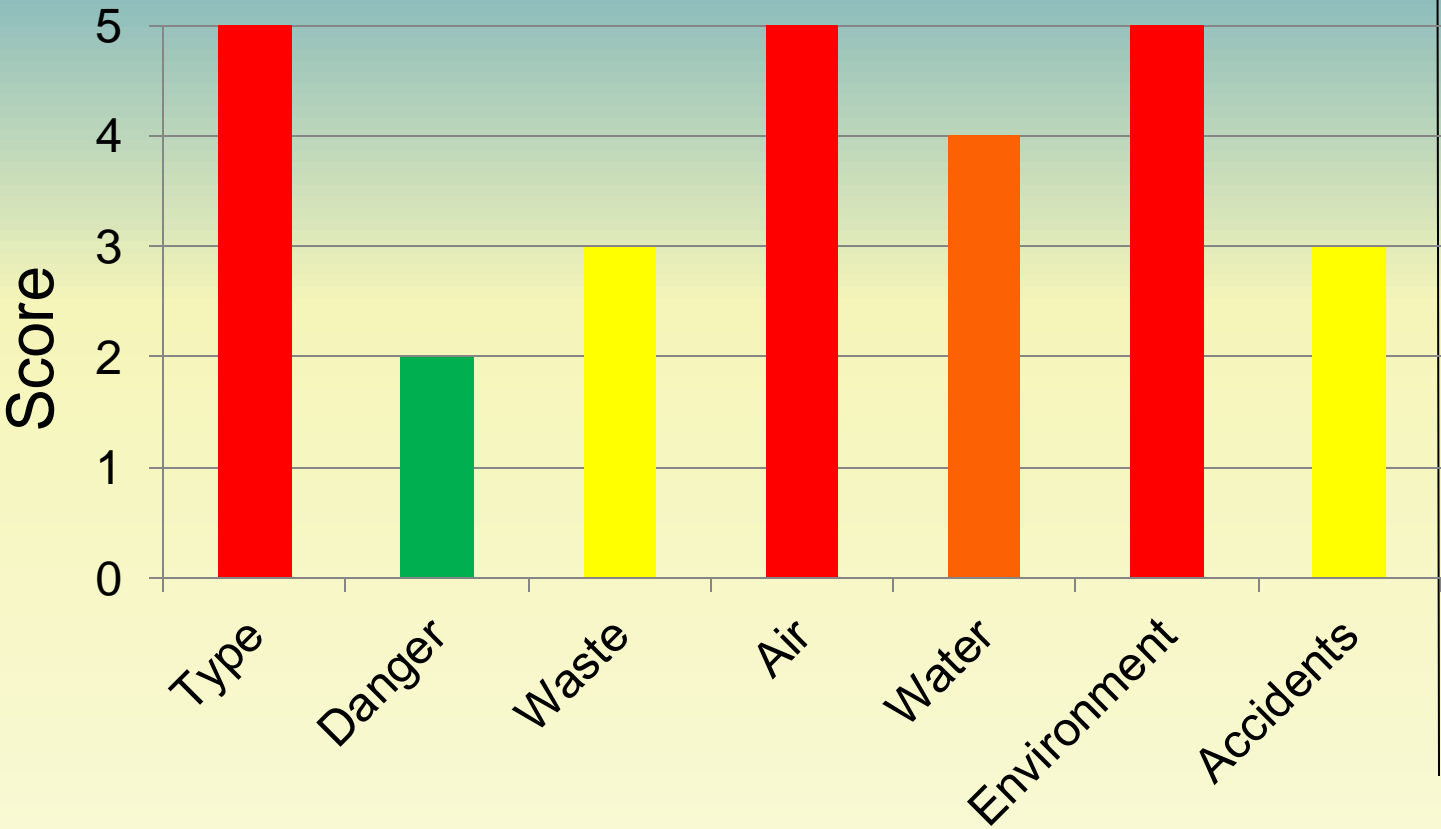
Scored Impact Criteria



Good Operator Performance



Bad Operator Performance



Integrated Risk Assessment Method

easyTools



IRAM principles

- I. The inspection frequency is determined by the highest impact score
- II. The inspection frequency is reduced by one step, if the set number of highest scores is not met (the Rule)
- III. The inspection frequency can be changed by one step up or down based on operator performance
- IV. The more criteria are scored high, the more inspection effort is needed

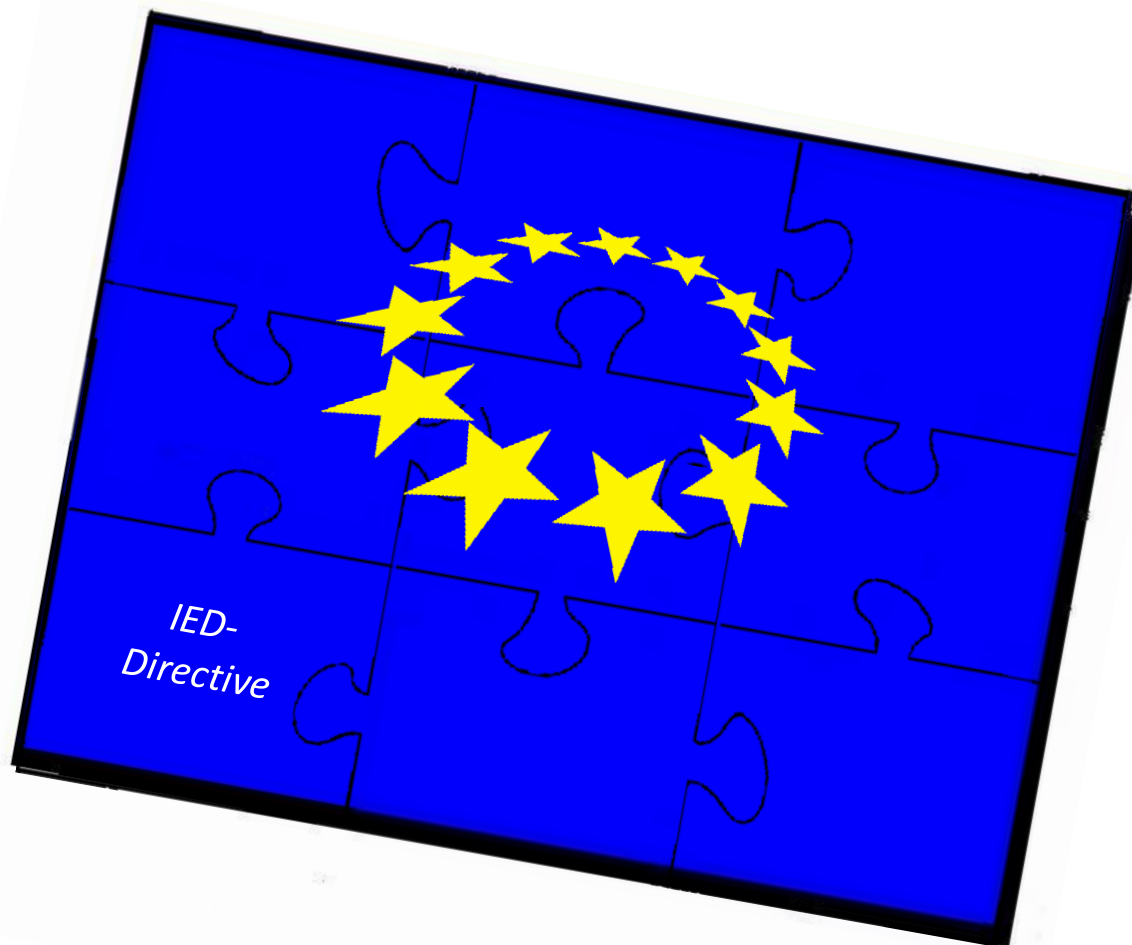


European Union Network for
the Implementation and Enforcement
of Environmental Law



Inspection Specifics

- Inspection plan, programme and results are published on the internet
- 25% of inspections are unannounced
- In case of serious non-compliance: another inspection after six months
- In case of accidents, incidents or neighbourhood complaints: non-routine inspections
- Sanctions: administrative order with deadline, penalty payment, fine, suspension of (a part of) the activity, hand over to the prosecutor





Questions?

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