

Environmental permitting under the Industrial Emissions Directive (IED) in Finland

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Green transition of heavy industry is my primary field of work nowadays



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Who am I?

- PhD in environmental chemistry, Lic. Sci. (tech)
- 20+ years of experience in environmental permitting
- Representing Finland in Sevilla process (BAT TWG)
- Being involved in implementation of IED into national legislation
- Being involved with IMPEL 10-20 years
- Being involved with Nordic projects to built BAT based permitting in Russia. Projects were terminated in Feb 2022.



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The IED covers the activities causing a great majority of **emissions in**

4. Chemical industry

For the purpose of this section, **production within** the meaning of the categories of activities contained in this section means the production on **an industrial scale** by chemical or biological processing of substances or groups of substances listed in points 4.1 to 4.6



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Activities covered by the IED:

- 1. Energy industries
- 2. Production and processing of metals
- 3. Mineral industry

- Textiles
- Slaughter houses
- Food production
- Etc.



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It's not only
about the IED



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There are plenty of other EU legislation to take into consideration

- Water Framework Directive
 - surface and ground water quality standards, EQS
 - Mixing zones
- Waste Framework Directive
 - End-of-Waste, by-product,...
- Ambient Air Quality Directive
- Environmental impact directive
- Habitats directive,
- Birds directive
- Animal by-products regulation
- Etc..



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There are BREFs for all activities listed in the IED – but not for all the processes

Permit conditions

- The ELVs are always based on BAT-AELs, if available
- ELVs for relevant parameters are set even if no BAT-AEL exists
- Derogations are possible, but not very common (applied only 5-10 times all together)



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We are very proud of our processing times



Processing times of the permit application in Finland

- < 10 months for new investments (median)
 - < 12 months for green transition (all)
 - Average of all 10 months
 - (appeals in court 1 – 3 years)
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- Application fee: € 66 per standardized hour
(e.g. chemical industry ~ € 50 000, dairy € 13 000, waste management € 20 – 70 000)



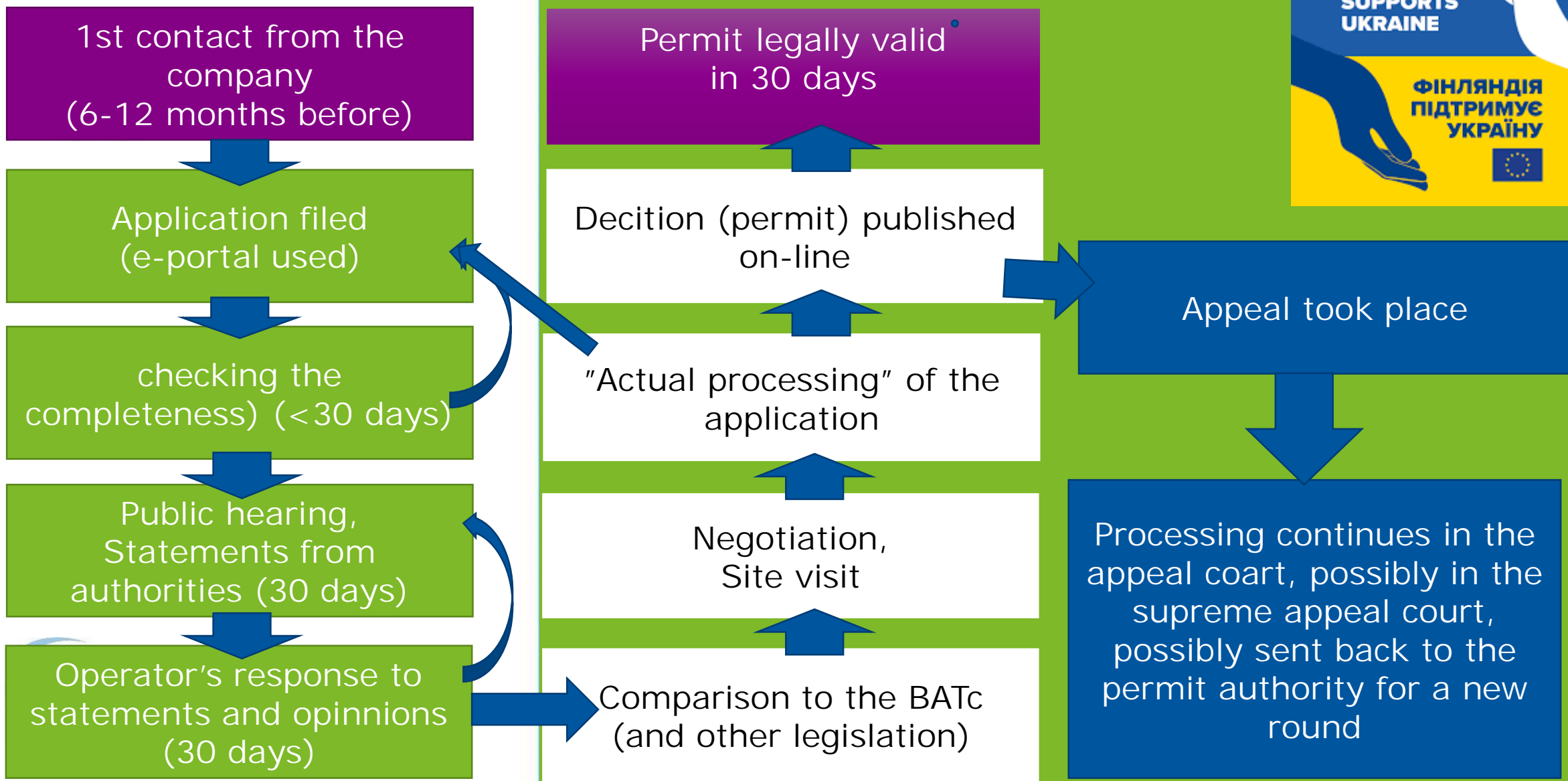
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a remarkable share of annual emissions can be caused during OTNOC

OTNOC, other than normal operation condition

- BAT-AEL is the limit value for normal operating condition (NOC)
- If ELV based on BAT-AEL for parameter A is $< 2 \text{ mg/Nm}^3$, can concentration during OTNOC be e.g. $\sim 100 \text{ mg/Nm}^3$
- In Finland, number of OTNOC hours is usually limited in the permit, e.g. 2 % of the time
- In Finland, for waste waters, BAT-AEL based ELV is always applied (e.g. 20 mg/l for parameter B) and usually also annual mass emission ELV (e.g. 20 kg/y for parameter B)





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Four years is
a very short
time



What happens after the BATc has been published?

- Supervising authority informs relevant operators that they need to do the comparison to the BATc
- Operators have 6 months to do the comparison and deliver it to the supervising authority
- Supervising authority either sets a deadline for application for permit revision or states that permit is in accordance with new BATc
- Operator applies for renewal of the permit based on new BATc
- Permit authority has 10 months to publish the renewed permit
- The operator has to operate in accordance with the revised permit in 4 years after the publication of BATc





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Thank you!

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