



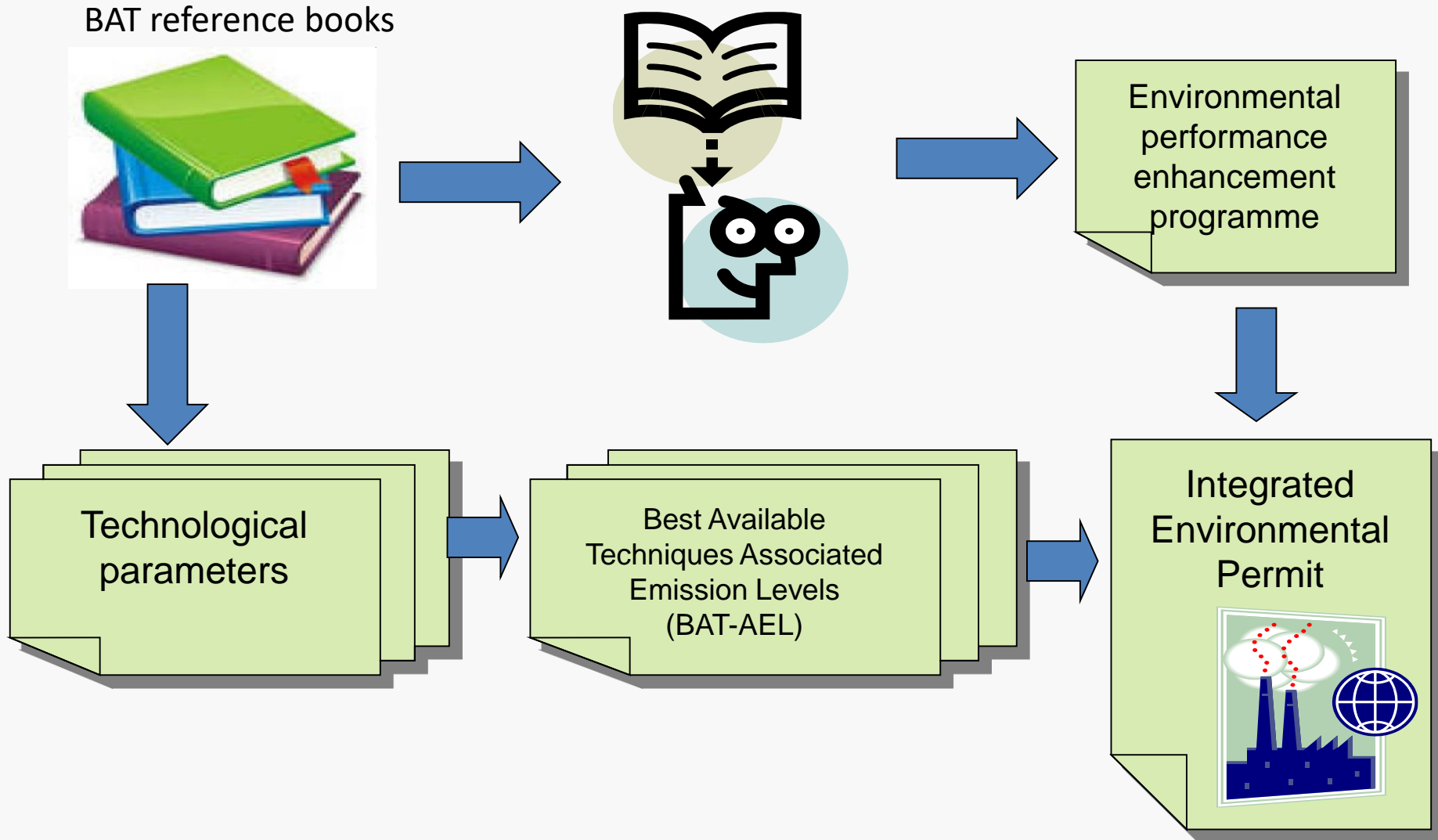
- Results of the analysis of the first generation of Russian BREFs and suggestions for their reviewing

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Key provisions of the Federal Law No. 219-FZ, 21 July 2014

- Ranking of the objects causing negative environmental impacts
- Differentiated approach to regulation of environmental impact based on categories of objects and optimization of the toxic substances control act
- Introduction of Integrated Environmental Permit
- **Drawing up Reference Books on Best Available Techniques**
- Introduction of technological regulation
- Introduction of Environmental performance enhancement programme
- Change of fees for negative environmental impact
- Introduction of offset of expenditures connected with environmental protection measures on account of negative environmental payment
- Introduction of tax expenditures and state support measures

Role of Reference Books on Best Available Techniques in the environmental impact regulatory system for existing enterprises

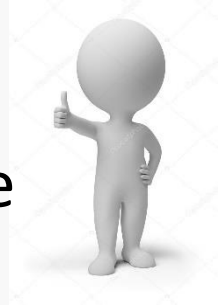


Basis for development of Environmental performance enhancement programme

1. Actual emissions are less than or equal to the BAT-AELs



Development of the Environmental performance enhancement programme is not required



2. Actual emissions exceed the BAT-AELs



It is necessary to develop the Environmental performance enhancement programme

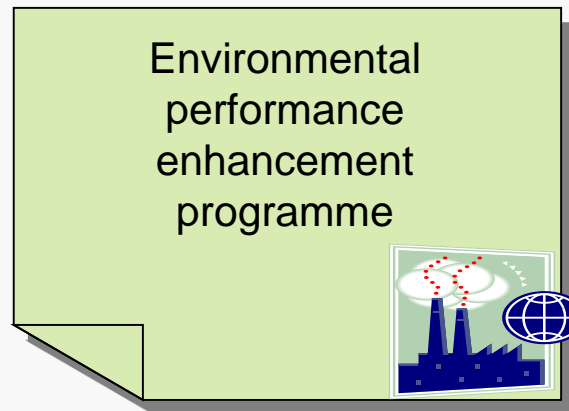
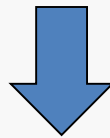
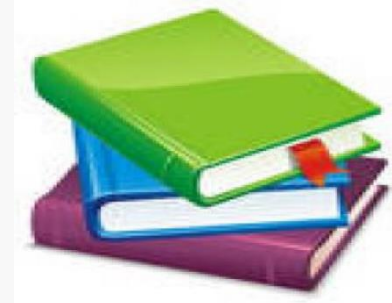


Application of BAT reference books for development of the Environmental performance enhancement programme

'vertical' (sector-oriented)
BAT reference book



'horizontal' (inter-sectoral)
BAT reference books



BAT reference books development procedure



- **Step 1 - identification of BAT application areas**
- **Step 2- setting criteria for classifying objects of negative impact as Category I**
- **Step 3 - setting of BAT reference books development time-schedule**
- **Step 4 – specifying the rules for development of BAT reference books**
- **Step 5 – drawing-up BAT reference books**

Reference Books on Best Available Techniques Development Schedule



- 2015 - 10 BAT reference books
- 2016 - 13 BAT reference books
- 2017 - 28 BAT reference books

Criteria for identifying Best Available Technology (Technique)



- **minimum level of negative environmental impact**
- **economic efficiency of BAT implementation and operation**
- **application of resource and energy efficient techniques (methods)**
- **implementation period**
- **industrial implementation of BAT at two or more installations**

Reference Book on Best Available Techniques contents: key provisions



- General description of the sector concerned
- Description of main technological processes (techniques)
- Characteristics of emissions
- Methodology for BAT determination
- Description of BAT
- Marker parameters
- Technological parameters of BAT
- Economic aspects of BAT implementation
- Methods to reduce negative impacts on the environment that require no capital expenditures
- Prospective technologies (emerging techniques)



Development of BAT reference books: main issues

- Short timeframes for development of BAT reference books
- Lack of interest from enterprises
- Data collection on emissions and other characteristics of the applied technologies (techniques):
 - is not ensured by current emission accounting system
 - requires considerable amount of time
- Credibility of submitted data
- Criteria for identifying BAT: industrial implementation of BAT at two or more installations
- Availability of unique BAT-related technologies implemented only at one facility

Analysis of Reference Books on Best Available Techniques: main application challenges



- Not all activities related to BAT application are described in BAT reference books
- BAT and technological parameters (BAT-AEL) are defined not for all technologies
- Discrepancies between substances for which the technological parameters are determined, and a list of substances that are subject to state regulation
- BAT is not defined for technologies (techniques) that are implemented only at one facility
- Links between sector-oriented and intersectoral BAT reference books are not shown
- Difficulties in the selection of activities for developing Environmental performance enhancement programs
- Use of prospective technologies (emerging techniques) or other technologies (techniques) at the BAT level does not entail economic benefits

ADDITIONALLY

- It is planned to adjust the criteria for classifying objects causing negative environment impact as Category I: supplementation and specification types of activities

Proposals for reviewing of Reference Books on Best Available Techniques



- Introduction of amendments to criteria for classifying technologies (techniques) as Best Available Techniques in terms of number of industrial implementations
- Reviewing of BAT reference books in terms of activities previously not included
- Reviewing of BAT reference books with regard to BAT selection for activities described in the reference book
- Bringing the list of marker substances in line with the list of substances that are subject to state regulation
- Clarification of BAT technological parameters values
- Allocation of BAT-AEL for 1 and 2 hazard class substances
- Providing interconnection between sector-oriented and intersectoral BAT reference books
- Development of guidelines on application of BAT reference books for development of the Environmental performance enhancement programme

THANK YOU FOR YOUR ATTENTION!

