

Categorisation of source streams

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Existing Regulation 601/2012/EC

- Article 19: Categorisation of installations and source streams
- Paragraph 3: classification of source streams in major, minor and de-minims
- Differences: in the tier approach (Article 26) in case of technical not feasible or leading to unreasonable costs
- What happens if only tier 1 is feasible after the 3 years transitional period
- Fall back approach is not allowed even if the uncertainty proves to be better

Improvement suggestion

- classification of source streams in “normal” and de-minins
- the complexity of article 26 can be reduced significantly without a consequence for the practical application of the concept of highest tiers, unreasonable costs and technical feasibility
- Employment of the fall back approach in cases where it leads to a lower uncertainty

Advantages

- Simplification and more transparency of the regulation and the monitoring plan.
- More clarity for operators in applying tiers for different source streams.
- Less notifications needed when source streams change classifications.
- Fall back approaches can be implemented when more accurate than lower tiers.

Disadvantages

- Change of existing rules might lead to confusion
- ???