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European IPPC Bureau (EIPPCB)

The Collection, Handling and Processing of Data

**For the review of the
Waste Treatment (WT) Best Available Techniques (BAT)
Reference document (BREF)**

Document to accompany the collection of data via plant-specific questionnaires

June 2014

1. Introduction

In order to be able to derive environmental performance levels associated with BAT (including associated emission levels associated with BAT) for inclusion in the revised WT BREF, it will be necessary to acquire data upon which to base their derivation. This is recognised by Article 13(1) of the Industrial Emissions Directive (IED, Directive 2010/75/EU), which requires the Commission to organise an exchange of information whenever a BREF is reviewed or drawn up for the first time. This exchange of information is performed through an ad hoc established Technical Working Group (TWG). Article 13(3) of the IED and the BREF Guidance (Commission Implementing Decision 2012/119/EU), in particular its Chapter 5 "Data collection and submission", complete the formal framework for the data collection.

The data in question will comprise:

- quantitative data (e.g. emission concentrations, consumption quantities, plant operating parameters); and
- qualitative data (e.g. contextual information regarding techniques, process routes, raw material type, output delivered).

This paper addresses the practicalities associated with the various steps involved in the collection, handling and processing of these data during the review of the WT BREF.

2. Questionnaire development

In line with the indication of the BREF Guidance, the acquisition of data during the review of the WT BREF is pursued using a questionnaire; this is now the normal practice during this type of exchange of information.

A flexible, dynamic questionnaire has been produced by means of the work of the TWG. The questionnaire is able to capture the complexity of WT installations where often several processes treating different types of waste are performed. This allows a comprehensive approach on data collection.

The questionnaire has been produced in the form of an adaptive Excel spreadsheet.

In the questionnaire, the EIPPCB included requests for data that are directly or indirectly required for the derivation of BAT conclusions. Data availability, as expressed by operators filling in the questionnaire, will be also considered when deriving BAT conclusions.

The questionnaire has been developed on the basis of the following input:

- kick-off meeting conclusions including the WT TWG decisions on questionnaire content and development;
- early data contributions from WT TWG members;
- preliminary surveys on techniques, key environmental issues, proposals of reference plants, and monitoring practices filled in by WT TWG members;
- TWG members' comments on working documents on categories of plants.

Two rounds of TWG members' comments have been received on drafts of the questionnaire; moreover, a testing step with volunteer operators, and a questionnaire subgroup workshop facilitated the questionnaire finalisation. The final version of the questionnaire took into account the opinion of the TWG in line with the questionnaire workshop conclusions.

3. Questionnaire dissemination

The questionnaire has been shared with all TWG members by the EIPPCB through BATIS. The EIPPCB email message to the TWG, launching the data collection, will indicate the date by which the completed questionnaires should be submitted.

The list of plants to which the questionnaire should be sent (reference plants) has been also shared on BATIS and TWG members have reviewed and updated it with specific contact details.

The TWG member(s) representing the Member State (MS) where each plant is located will:

- indicate on the front page of the blank questionnaire the contact points (helpdesk from MS and from industry non-governmental organisation (NGO)) for helping the operator in filling in the questionnaire;
- send the blank questionnaire (with the contact points details) directly to the operator of the reference plant;
- check that the questionnaire has been received by the operator (e.g. by means of acknowledging receipt or similar).

Valuable information from permits or other documents on a reference plant can be provided in parallel to complement the information given by means of the filled-in questionnaires.

The EIPPCB also encourages additional operators to provide data using the same questionnaire template to describe their plant (i.e. additional plants currently not in the list of reference plants) within the same timeline. The reference plants list will be updated where needed.

Each plant will be given a unique identifier. This will allow a specific filled-in questionnaire to be identified using a simple combination of codes.

4. Questionnaire completion

The questionnaires should be filled in without modification of the structure or the questions. The spreadsheet's structure and questions will be protected wherever needed to ensure that efficient data mining will be feasible.

In order to assist operators when filling in the questionnaire, two levels of helpdesk are provided:

- The first level is provided by the TWG members (from MS and/or industry organisation) indicated on the front page of the disseminated questionnaire.
- The second level is provided by the EIPPCB, which will update the FAQ section on BATIS where answers to questions about filling in the questionnaire are given. If a need for greater clarity or guidance becomes apparent during the completion of the questionnaire, the EIPPCB could alert the recipients of the questionnaire by email. Details of EIPPCB staff who can be contacted for assistance are provided on the front page of the questionnaire.

The operator's contact details should always be included in the filled-in questionnaire (or in the email message delivering the filled-in questionnaire to the MS) for the EIPPCB to ask for clarification on data provided when needed.

5. Questionnaire structure and content

In order to capture the complexity of real reference plants, the information needed is flexibly adapted to the, often combined, activities performed in the plant concerned. By hiding optional/unrequired sheets and adapting techniques and pollutants lists for simple plant categories, the questionnaire remains manageable for simpler plants, to encourage the filling in.

The questionnaire is based on the relevant plant categories expressed as combination treatment / waste stream on the basis of TWG input and discussions at the workshop for the questionnaire finalisation. For each chosen category or combination of categories, the questionnaire will show an appropriate selection of process sheets, of pollutants and of emissions control techniques. This selection can however be customised by the operator to better describe the plant concerned.

The questionnaire structure is as follows:

- Questionnaire information
- Guidelines

- 1. Waste treatment activity
- 2. Waste INPUT
- 3. OUTPUT
- 4.a Characterisation waste input
- 4.b Characterisation output
- 5. Storage and common steps
- 6. Process - Mechanical
- 7. Process - Biological
- 8. Process - Physico-chemical
- 9. Emissions to air
- 10. Emissions to water
- 11. Water consumption
- 12. Raw material consumption
- 13. Energy consumption
- BAT candidate template

An additional explanation on each sheet is given in the "WT questionnaire User's manual".

Regarding the information requested in the questionnaire, it is also important to recall the following:

- For information to be claimed to be confidential by the operator, it must represent part of an operator's (or third party's) intellectual property, or sensitive commercial data, and it must be the case that the release of this information would materially harm that operator's (or that third party's) commercial interests. Please note that emissions data and related information cannot be considered confidential information.
- The IED Article 13 Forum attached great importance to transparency in the information exchange at its meeting of 6th June 2013: transparency is at the heart of the Sevilla process, which aims to determine Best Available Techniques and associated environmental performance values.

All this taken into account, the aim of this data collection is to maximise the amount of data available to TWG members on BATIS, so that the determination of BAT remains a high-quality data-driven and verifiable process. To this end, it is expected that no or a minimal fraction of the information is claimed to be confidential (e.g. in some exceptional and justified cases, data related to raw material consumption and energy consumption).

6. Submission of filled-in questionnaires

Once filled in, the questionnaires will be sent directly back to the TWG members that disseminated the questionnaire. In order to facilitate the efficient handling of the data, the questionnaires should be submitted electronically.

Where operators deem it necessary to claim information is confidential, they should explain in appropriate detail why the information is confidential and in which circumstances, if any, the confidential information can be made public (e.g. after aggregation with data from similar plants or after anonymisation).

7. MS' check of filled-in questionnaires

The filled-in questionnaires will be collected and checked by the TWG members of the Member State where the plant is located. The Member State TWG members will:

- ensure the quality, completeness and consistency of data from plants located within the Member State;
- check confidentiality claims in accordance with the BREF Guidance Section 5.3: in the event that some information is claimed and accepted by the MS to be confidential, the non-confidential part of the questionnaire (extracted by the operator or the MS) is posted onto BATIS, while the whole questionnaire, including confidential information, is sent to the EIPPCB by email;
- post all the non-confidential questionnaires directly onto BATIS.

The minimum information in one questionnaire is:

- Plant information
- Category(-ies) (combination process/waste) – sheet 1
- Waste input – sheet 2
- The main process steps and main outputs
- Emissions to air and related techniques – sheet 9
- Emissions to water and related techniques – sheet 10
- Consumption (water, raw materials, energy) – sheets 11, 12 and 13

For additional information, see the BREF Guidance, in particular Section 5.3, KOM report Section 4.1 on data/information collection and the IED Forum conclusions of 06.06.2013 on transparency in the exchange of information.

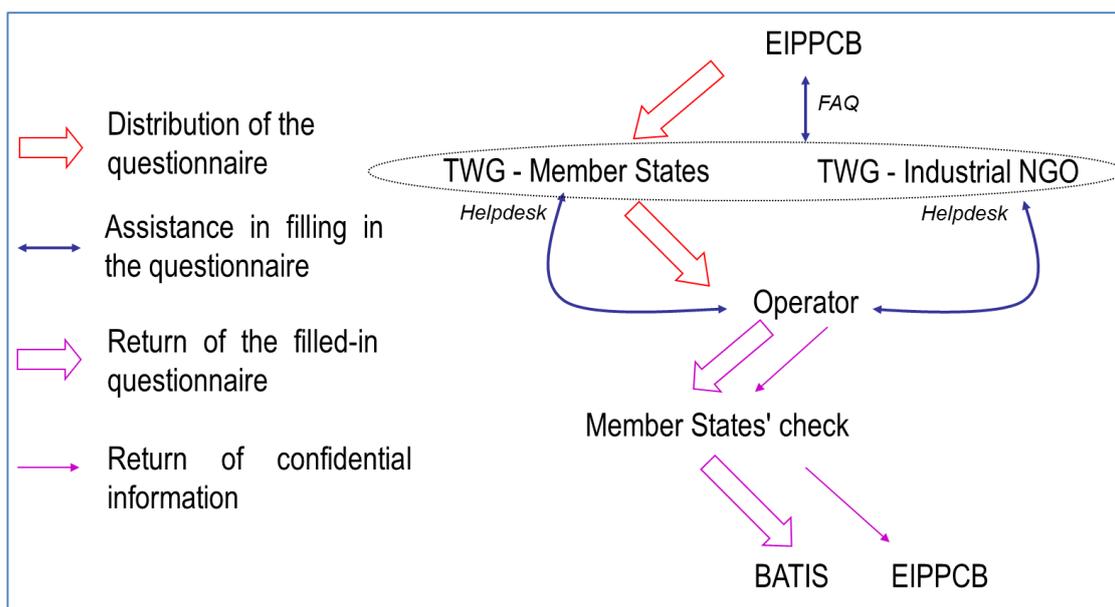
8. Receipt of filled-in questionnaires

When the filled-in questionnaires pass the first level check for the inclusion in the following steps, MS TWG members will upload the filled-in questionnaire onto BATIS by the date specified in the aforementioned message launching the data collection. In case of a filled-in questionnaire containing sensitive information, this questionnaire will be sent to the EIPPCB by email by the same date.

A spreadsheet that contains commercially sensitive information could be protected using a password before submission, and the password used can be communicated to the MS and the EIPPCB in a separate communication.

9. Data storage and sharing

The following picture summarises the questionnaire dissemination and recollection.



With the exception of data agreed to be commercially sensitive, all of the received data will be posted onto BATIS. Where any such data have been changed based on requests for additional information, the records of these changes will also be posted onto BATIS.

Naming of plants linked to emissions and techniques is not considered problematic or sensitive in the exchange of information and is key to the credibility of the Sevilla process.

If operators require data to be considered as confidential they should generate 2 questionnaires: one with the complete data sets (only for the EIPPCB) and another with the non-confidential information (to share on BATIS).

Any questionnaires that contain commercially sensitive information will be handled by the EIPPCB in accordance with the internal security measures adopted by European Commission on security of information systems and its implementation rules. These measures ensure that only a limited number of Commission staff will have access to these filled-in questionnaires, which will be handled in a secure fashion. The questionnaires, and the records of any modifications to data carried out during the data validation exercise, will be held by the EIPPCB for possible future reference.

Raw data and information excluded from BATIS on the grounds of confidentiality can be put in aggregated or anonymised form onto BATIS, so that the latter information is available to the whole TWG.

8. Data validation

A second level quality control (see BREF Guidance Chapter 6) will be done by the EIPPCB, as an initial part of the data analysis. The data contained in the filled-in questionnaires submitted will be verified by the EIPPCB with a view to validating them. The below non-exhaustive list of validation steps that will be performed will check:

- Data appropriateness in relation to what is requested
- Data/information clarity/completeness, including for information that is unavailable.

During or at the end of these steps, the EIPPCB may decide to request additional information on the plant concerned, or to discard the questionnaire.

The data validation exercise will be finally reflected on BATIS for transparency, indicating whether a filled-in questionnaire has been retained or not. Additional information provided by operators, leading to modifications of filled-in questionnaires that are deemed necessary during the data validation exercise, will be recorded too.

10. Data analysis

The data that are requested have been identified as being required for one or more specific purposes (key environmental issues, contextual information, including monitoring information, parameter to allow proper comparability of plants) at the KOM and during the development of the questionnaire. The EIPPCB will analyse the data in line with these purposes.

Generally, raw data that are not shared within the TWG or that cannot be checked are not used to derive BAT; if needed, the EIPPCB will take sufficient measures to maintain the installation's anonymity in relation to sensitive data:

- by anonymisation, paying special care when there is a low number of installations per category;
- by avoiding the identification of installations by breaking down/aggregating the pieces of information.

The data analysis, in combination with other analyses, will allow the EIPPCB to propose in the first draft (D1) of the revised WT BREF a set of BAT conclusions through an iterative process involving the following steps:

1. identification/confirmation of the key environmental issues for the Waste Treatment sector;
2. examination of the techniques most relevant for addressing these key issues;
3. identification of the best environmental performance levels, on the basis of the available data in the European Union and worldwide;
4. examination of the conditions under which these environmental performance levels were achieved, such as costs, cross-media effects, and the main driving forces involved in the implementation of the techniques;
5. selection of the best available techniques (BAT), their associated environmental performance levels (including associated emission levels) and the associated monitoring for this sector according to Article 3(10) of, and Annex III to, the Directive.

Economic data are requested together with the descriptions of the techniques presented by means of a BAT candidate template. Where available, these data may give a rough indication of the magnitude of the costs and benefits. However, the actual costs and benefits of applying a technique may depend on the specific situation of the plant/installation concerned. In combination with data concerning costs, conclusions on the economic viability of techniques are also drawn from observations on existing plants/installations.

Expert judgement by the EIPPCB and the TWG plays a key role in each of these steps and the way in which the information will be presented. Each TWG member will have the possibility to compare the proposals of the EIPPCB with their own analysis based on the same available data shared on BATIS and to provide comments to improve the information given in the BREF.

The WT BREF review team
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