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Seville, 17/11/2021

Subject: Guidelines for the expression of initial positions for the review of the Best Available Techniques reference document for the Surface Treatment of Metals and Plastics (the STM BREF) – Call for initial positions, Document 1
– **Deadline: 21 January 2022**

Dear TWG members,

It is our pleasure to welcome you as members of the Technical Working Group (TWG) for the review of the Best Available Techniques (BAT) reference document for the Surface Treatment of Metals and Plastics, the STM BREF.

The review of the STM BREF started with the activation of the TWG¹ which has resulted, as of today, in a TWG with approximately 135 members from EU Member States and EFTA countries, industry, environmental NGOs and services of the Commission. The list of TWG members nominated so far is available in the BAT Information System (BATIS).

You should have recently received your access credentials for logging into BATIS via this web page <http://eippcb.jrc.ec.europa.eu/batis/login.jsp>. Information on data processing and protection can be found in the 'BREF Guidance'² and in the privacy statement³ published on the EIPPCB website.

Please review the contact details given in BATIS in relation to your profile. Should you find incorrect information, or for general questions about BATIS, or for any changes of contact details, please contact the EIPPCB Secretariat (email: JRC-B5-EIPPCB@ec.europa.eu).

Below, you will find some guidelines on the upcoming review of the STM BREF, especially on:

- the main steps for the review of the STM BREF;
- the role of a TWG member as stipulated by the BREF Guidance²;
- guidelines for the expression of TWG members' initial positions on the main issues for the review of the STM BREF.

You are kindly asked to express your initial positions on the review of the STM BREF by

21 January 2022

using the guidelines given below.

¹ Letter from Serge Roudier dated 28 June 2021.

² Commission Implementing Decision 2012/119/EU laying down rules concerning guidance on the collection of data and on the drawing up of BAT reference documents and on their quality assurance referred to in Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, Official Journal of the European Union, L 63, 3.3.2012, p. 1-39, http://data.europa.eu/eli/dec_impl/2012/119/2012-03-02.

³ http://eippcb.jrc.ec.europa.eu/reference/BREF/Privacy_Statement_BATIS_DPO_1586.pdf.

As of today, the STM TWG kick-off meeting is likely to take place around May 2022. Please bear in mind that the meeting dates depend not only on the progress of the review of the STM BREF, but also on the overall work planning of the EIPPCB.

Main steps for the review of the STM BREF

These will follow the typical workflow given in Section 1.2.4 of the BREF Guidance²:

- ✓ Preparation for the review by the EIPPCB (done, started in June 2021).
- ✓ TWG activation (done, June 2021).
- ✓ Call for the expression of TWG members' initial positions (this document and associated documents).
 - Expression of TWG members' initial positions (deadline: 21 January 2022).
 - Kick-off meeting of the TWG (indicatively: May 2022).
 - Questionnaire(s) development for gathering plant-specific data.
 - Submission of information (deadlines will be set at the kick-off meeting).
 - First formal draft of the revised STM BREF.
 - TWG comments on the first draft.
 - Second formal draft of the revised STM BREF (optional).
 - TWG comments on the second draft (optional).
 - Final TWG meeting.
 - Final draft.
 - Presentation of the BREF at an IED Article 13 forum meeting.
 - Member States' vote on the BAT conclusions at an IED Article 75 Committee meeting.
 - Publication of the BAT conclusions in the Official Journal of the European Union.
 - Publication of the BREF on the EIPPCB website.

Role of a TWG member

We would like to stress that TWG members are nominated to participate in the information exchange primarily based on their technical and/or regulatory expertise as well as on their ability to bring the BREF end user's perspective. The tasks and duties of a TWG member are detailed in the BREF Guidance².

For your convenience, the main tasks of a TWG member described in the BREF Guidance are given here:

1. To gain an awareness and understanding of the BREF Guidance.
2. To identify and list new/updated key data and issues relevant for deriving or updating BAT conclusions for the sector.
3. To actively collect targeted technical and economic information important for the review of the STM BREF, including in particular emission and consumption data from installations covered by the BREF (for the sector/Member State that he/she is representing). This will be carried out according to the process agreed by the TWG in line with the principles set out in the BREF Guidance. It will also take into account issues such as confidential business information, sensitive information under competition law, conflicts of interest and other related matters.
4. To check the quality of the data and information collected before submitting them to the EIPPCB, in particular the data contained in the completed templates/questionnaires used to gather plant- or installation-specific information (see the BREF Guidance Sections 5.4 and 5.5).
5. To share the data collected with other STM TWG members (including the EIPPCB) by posting the information directly onto BATIS, with the possible exception of confidential business information or sensitive information under competition law (exceptionally, data may be submitted through other electronic means, e.g. via email).
6. To respond in a timely manner to requests for additional information or clarifications from the EIPPCB.

7. To comment within the set deadlines on the formal draft(s) of the STM BREF and other documents prepared by the EIPPCB.
8. To attend the STM TWG meetings (including possible webinars) and actively participate in them.
9. To share experience with the EIPPCB and other STM TWG members (e.g. during site visits to STM installations).
10. To identify and establish contacts/networks with non-TWG members (e.g. shadow groups of experts, competent authorities, operators or groups of operators, national groups) to gain more experience to be shared with the rest of the STM TWG including the EIPPCB.

Most of the work for STM TWG members can be expected to take place outside of the plenary meetings in the form of submitting information and reviewing draft text proposals. In particular, the successful development of the STM BREF requires the TWG to respond in detail to substantial draft documents within a limited timeframe.

Guidelines for the expression of TWG members' initial positions on the main issues for the review of the STM BREF

The review of the STM BREF requires front-loading the work, especially in order to decide at the kick-off meeting on the scope of the BREF and the pollutants to be addressed. To express the TWG members' initial positions, the following tools are provided:

1. Guidelines in this letter (**Document 1**) on the way each TWG member is invited to express his/her position⁴.
2. A background document (**Document 2**) containing proposals and information requests regarding:
 - a. the scope of the STM BREF;
 - b. the structure (and contents) of the STM BREF and of its BAT conclusions;
 - c. the key environmental issues (KEIs) for the STM BREF;
 - d. the data collection for the STM BREF;
 - e. the techniques to consider in the determination of BAT (i.e. 'BAT candidates') and emerging techniques.
3. An Excel file template for the expression of the TWG initial positions (**Document 3**).
4. A presentation with a quick introduction on how to post information onto the BATIS platform (**Document 4**). A more thorough presentation of BATIS and of its main functionalities may be given to the participants of the kick-off meeting.

Please consider that these documents are only used for the front-loading input to focus the discussion on the most important issues. These documents do not prejudice in any way the future BAT conclusions that will be shaped by means of the TWG exchange of information. The proposals included in **Document 2** are based on the information currently available.

The TWG members are invited to compile their positions on the review of the STM BREF by filling in Document 3. This should be done by following the guidelines in this document (i.e. **Document 1**), those in **Document 2** and the tips given in the Excel file template itself (i.e. **Document 3**). To ease the completion of the provided templates and the evaluation of feedback, the templates have been designed to provide simple options as answers.

⁴ This step corresponds to the 'call for wishes' indicated in Section 4.6.1 of the BREF Guidance.

IMPORTANT

To be fully useable, a TWG member's position should be accompanied by:

- (a) a short relevant rationale explaining the reasons behind the position;
- (b) supporting documents for the rationale (e.g. reports, studies), if appropriate, (to be posted in BATIS and referenced in the filled-in Excel file);
- (c) clear suggestions on how to collect the information considered necessary for the review of the BREF, including known sources.

At this stage of drafting the BREF, details are not needed; detailed information will be collected by means of the data and information collection following the kick-off meeting. Please indicate in **Document 3** whether you will be able to provide technical information especially on the BAT candidate techniques, emerging techniques and/or plant-specific environmental performance data at a later stage.

Finally, the TWG members are kindly invited to post the compiled files (i.e. the filled-in **Document 3** and any supporting documents) into the following folder in BATIS:

[BATIS>Forum> Surface Treatment of Metals and Plastics> 02. First STM BREF review 2021-> 02 Call for initial positions>02 TWG Initial Positions](#)

by 21 January 2022 (to this end, please check the tips given in the quick introduction for posting onto BATIS (**Document 4**)).

The compiled list of initial positions submitted by the STM TWG members will be grouped on the basis of the points indicated above and used to organise and structure the discussions at the kick-off meeting (see Section 4.6.2.2 of the BREF Guidance).

Should you have any questions regarding these guidelines or on the review of the STM BREF, please do not hesitate to contact us by e-mail at: JRC-B5-EIPPCB-STM@ec.europa.eu or by phone (see below).

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