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General Secretariat

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**Interinstitutional files:
2022/0104 (COD)**

WK 11068/2023 ADD 1

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REQUEST FOR CONTRIBUTION

From: General Secretariat of the Council
To: Working Party on the Environment

Subject: Industrial Emissions Directive and Industrial Emissions Portal: Follow-up to the WPE meeting on 1 September - Comments from delegations

Following the call for comments (WK 10677/23 ADD 1), delegations will find attached the comments received from DE, LT, AT and PL.

Delegations are kindly invited to download the original format of the comments from the Delegates portal in order to have a better readability.

Item No.	Description	Quantity	Unit	Rate	Total
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LITHUANIA

Comments on the amendments adopted by the European Parliament on the Proposal for an Industrial Emissions Directive

Line (of the four-column document)	Article (of the revised Directive)	Position (towards EP AM)	Comments (justification)
54a, 54b	Title	against	
59b	3	against, red line	odours are not pollutants
59d	3	against	
65, 65a, 65c, 86a, 86b, 86c	3	against	excessive requirements
73b	3	neutral	
86e	3a	against	
88b	5(2)	against	increases the administrative burden
96, 96a, 96b, 96c	5(4)	against	increases administrative burden, creates an alternative permit issuing system
103a	7	against	
113a, 113b	8	against	
116b, 116c	11(c)	against	
129b	14(1)	against	possibly duplicates other directives, questionable added value
131	14(1)	against	odours are not pollutants; questionable added value of the reference
174a, 175, 178	15(4)	against	
182	15(4)	neutral	
183c, 183d, 183e, 183f, 183g, 183h	15(4)	against	
197	18	against	
197b	19	neutral	
197d	20	against	excessive requirements
197f	21(1)	neutral	
197h, 197j	21(3), 21(3a)	neutral	
208b	24(2)	against	
215b	25(1)	against	the proposal may be incompatible with the legal systems of the Member States
218, 218b	25(3)	against	excessive requirements

221, 221b	26	against	excessive requirements
233	27a(2)	neutral	
239a	27a	against	Article 27a does not apply to farmers
247	27b	against	we have doubts about the extension of the time, it is not clear what the benefits would be
253	27d	neutral	
262–262l	42, 58, 63, 64	against	provisions are particularly complex and difficult to implement
269	70a	against	we would like to stick to the general approach
269a	70a	against	
275	70c	against	we would like to stick to the general approach
285a	70c	neutral	
332	70i	against	
347a, 347b	74	against, red line	we do not support the amendment of Annex I by delegated act
369	79	against	we would like to stick to the general approach
370	79	against	we would like to stick to the general approach
371, 373, 374, 374a, 374e, 374f	79	against, red line	we would like to stick to the general approach
378, 379, 381, 381a, 382a, 382b	79a	against, red line	we would like to stick to the general approach
402a, 402b	Annex I	against	
422, 423, 424,	Annex I	neutral	
443a, 445, 446, 447, 447a, 448, 449	Annex Ia		inter-institutional consultations on Annex Ia are still ongoing
