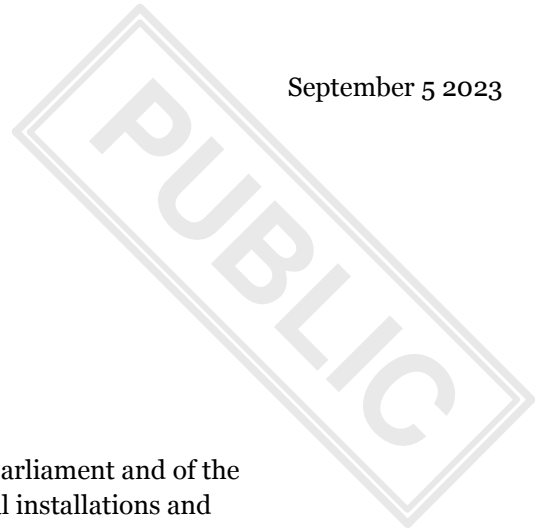


POLAND				
Line of the four column document	Article of the revised Directive	Position (towards EP AMI)		Comments (justification)
<b>Minimisation of emissions and related transitional provisions</b>				
56b		1 neutral		
56d		1 neutral		
129b		14(1) against		In PL opinion this kind of information should be already analysed in permit. There is no need to add this specific requirement.
131		14(1) against		PL do not agree to include odour issues in IED. It is not necessary to specify directives which list hazardous substances.
163		15(1) against		PL is still analysing this amendment
164		15(1) against		PL is still analysing this amendment
171		15(3) in favour		PL is in favour of transitional period given in the proposed amendment.
174a		15(3) neutral		
178		15(4) in favour		PL support the amendment as it is helpful in case the operator knows that the installation will be closed within 4 years. So there is no need to comply with BAT conclusions.
181		15(4) against		It should for competent authorities to decide for how long should be the derogation granted.
182		15(4) in favour		It corresponds with polish law which is already in place, there is 5 years period to revise permit so it would be more convenient for competent authority.
183c		15(4) against		PL support general approach as better reflect the requirements.
183d		15(4) against		PL support general approach as better reflect the requirements.
183e		15(4) against		PL support general approach as better reflect the requirements.
183f		15(4) against		PL support general approach as better reflect the requirements.
183g		15(4) against		PL support general approach as better reflect the requirements.
183h		15(4) against		PL support general approach as better reflect the requirements.
187		15a neutral		
189		15a neutral		
196		18 against		In our opinion there is no need adding load as it only concern water.
197		18 against		Amendment generate additional requirement which does not have added value.
463	Annex II	neutral		
197f		21 against		In PL reconsideration of the permit is being done at least every 5 years. In our opinion every 8 years is too rarely.
197h		21 neutral		
197i		21 neutral		Still being analysed.
96a		6 neutral		
192a		17 neutral		
75b		34a neutral		
<b>Innovation and industrial transformation</b>				
77		3(50) in favour		In line with amendment proposed by EC.
78		3(51)		Amendment concerning environmental performance levels associated with emerging techniques is being still analyzed.
123		13(1) against		PL is against this amendments as IED is not appropriate directive to take into account health issues. It should also be explained what would be the role of EEA.
125		13(2) neutral		
228		27 neutral		Gives no added value as it is already known that no specific technique is prescribed.
233		27a against		It should be explained how this assessment will be carried.
239a		27a against		Farmers which installation is covered by IED are in
241		27a against		This issue should not be reflected in IED.
247		27b in favour		The longer period of time will give better and more credible results.
250		27c in favour		The obligation to provide data by Member State organizes better the flow of information.
253		27d against		There is no need to add additional requirements.
254		27d against		PL is in favour to implementing act as the act to set the requirements.
96b		5(4b) in favour		It encourages for the choice of emerging techniques
<b>Penalties and compensation</b>				
100		7 neutral		
103a		7 against		This amendment does not give added value. Already existing regulations in IED cover requirements added by EP amendments.
104		7 against		There is no art. 26(5) proposed by EP.
106		8 against		
109		8 against		No needed change.
113a		8 against		Requires further explanation as in our opinion IED is not proper for this requirements.
113b		8 against		
114		8 neutral		
115a		8 against		As in line 104
370		79 against		Poland sustain agreements from General approach to delete references to the annual turnover and income from the paragraph 2. Poland would like to highlight such an approach does not fit at all to the systems where various fines rates are assigned to the emitted pollutants. In consequence the amount of fine is proportional to the height of exceedance and its impact on the environment - what reflects well the polluter pays principle. It would be particularly complicated to merge such a system with a rule referring to the annual turnover or income. Moreover the we should keep in mind that companies with relatively low annual turnover could cause substantial damage in the environment.
374		79 against		PL support general approach.
374a		79 against		PL support general approach.
374e		79 neutral		The proposal is being still analysed.
374f		79 neutral		The proposal is being still analysed.
378		79a against		Poland is strongly in favour of General position which deleted the text indicating the responsibility of the authorities. Detailed rules related to liability for damages should remain within the competence of the Member States.
381		79a against		as in line 378
381a		79a against		as in line 378
382a		79a against		as in line 378
382b		79a against		Additional administrative burden.
199b		22 neutral		Surface water added.
199d		22 neutral		The proposal is not consistent. In first sentence there is only mentioned: soil and groundwater and in second sentence soil, surface and groundwater.
199f		23 against		Still analysed.
199h		23 neutral		Would be useful.
<b>Public participation</b>				
67		3(17) in favour		No change comparing to EC and EC proposal.
88b		5(2) against		PL has similar requirements already in place. PL is not in favour as for electronic permitting system. Administrative burden.
89-96c		5(4) against		Poland is in favour to delete permit summary as it was agreed in General approach. Poland is convinced that permit summary would be a relevant administrative burden increasing already significant workload imposed on the Competent Authorities. It should be stressed that it's just one of many additional elements which according to the proposal shall be included in the permit.
201b		24 against		To explain: is there need to add reconsidering of the permit if granting will need to have public participation?
208		24 in favour		
208b		24 against		According to PL negative position to permit summary.
210c		24 neutral		
212		24 in favour		
214		24 against		Additional administrative burden.
215b		25 neutral		Still being analysed.
217		25 neutral		
218b		25 against		Need to be explained what is understood as sub-national public authority.
220		26 neutral		
221b		26 against		Unnecessary administrative burden. Such communication channels must be made anyway.
474g	Annex IV	neutral		
474h	Annex IV	neutral		Still analysed.
474i	Annex IV	neutral		
474j	Annex IV	against		Unnecessary administrative burden.
86e		3a against		PL do not see need to include CB8 in IED.

Line (of the four column document)	Article (of the revised Directive)	Position (towards EP AM)	Comments (justification)
14	Recital 4	in favour	Cattle should be deleted from the text, as the EP amendments do not wish to extend the scope of the directive to cattle. We support the reciprocity clause because we believe it is important that producers outside the European Union meet similar environmental standards on the basis of reciprocity to avoid competitive disadvantages in the market. We agree that the BAT should not include any recommendation that would lead to a shift from pasture-based systems to fully indoor rearing.
30a	Recital 20a	in favour	
39	Recital 29	red line	When establishing operating rules for rearing pig and poultry Hungary sticks to implementing act.
54b	Article 1	neutral	
67b	Article 1	neutral	
70	Article 1	in favour	Cattle should be deleted from the text, as the EP amendments do not wish to extend the scope of the directive to cattle.
71	Article 1	neutral	
73b	Article 1	in favour	We support the extension of the definition of extensive livestock farming to organic livestock farming, as we have previously requested.
131	Article 14	red line	Hungary does not support including odour in the text.
265	Article 70		Cattle should be removed from the text.
269	Article 70a scope	in favour	We agree with the amendment proposed by the EP to maintain the rules currently in force, in particular the lower thresholds under which certain poultry and pig holdings fall within the scope of the Directive. The Hungarian position previously, prior to the consultations, did not support the extension of the scope, neither the reduction of the animal number threshold nor the extension to the cattle sector, because it would impose a significant additional burden on both the livestock sectors and the authorities, while the benefits of the amendment would be marginal.
269a	Article 70a	in favour	We support the reciprocity clause because we believe it is important that producers outside the European Union meet similar environmental standards on the basis of reciprocity to avoid competitive disadvantages in the market.
272	Article 70b	in favour	Publishing the guidelines on the criteria to consider different installations as a single unit earlier is preferable and help the MS.
280	Article 70c	against	Hungary does not support measures increasing administrative burdens.
283a	Article 70c	against	Hungary does not support measures increasing administrative burdens.
285a	Article 70 c	neutral	
288	Article 70d	red line	Hungary does not support delegated act for operation rules.
290	Article 70d	red line	Hungary does not support delegated act for operation rules.
294	Article 70e	red line	Hungary does not support delegated act for operation rules.
331	Article 70 i		Cattle should be deleted from the text.
332	Article 70 i	red line	Hungary does not support delegated act for operation rules.
360	Article 76	red line	Hungary does not support delegated act for operation rules.
361	Article 76	red line	Hungary does not support delegated act for operation rules (Article 70).
369		red line	Stick to Council Mandate, as legislation on criminal sanctions is a national competence, the general approach reflects this.
370		red line	Stick to Council Mandate, as the legislation on criminal sanctions is a national competence, the general approach reflects this.
371-374f		against	Stick to Council Mandate, as legislation on criminal sanctions is a national competence, the general approach reflects this.
378-381a		against	Stick to Council Mandate, as the legislation on compensation is a national competence, the general approach reflects this.
389	Directive 1999/31 EC	against	Hungary does not support 18 month for transposition.
443a	Annex I	in favour	We agree with the amendment proposed by the EP to maintain the rules currently in force, in particular the lower thresholds under which certain poultry and pig holdings fall within the scope of the Directive. The Hungarian position previously, prior to the consultations, did not support the extension of the scope, neither the reduction of the animal number threshold nor the extension to the cattle sector, because it would impose a significant additional burden on both the livestock sectors and the authorities, while the benefits of the amendment would be marginal.
444-447	Annex II	in favour	We agree with the amendment proposed by the EP to maintain the rules currently in force, in particular the lower thresholds under which certain poultry and pig holdings fall within the scope of the Directive.



September 5 2023



Comments on proposal for a Regulation of the European Parliament and of the Council on reporting of environmental data from industrial installations and establishing an Industrial Emissions Portal and Proposal for a Directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)

Comments and proposals following WPE on the 5 september 2023 from Denmark.

Line	Article	Position	Comments (justification)
56	Article 1(2)	Against	It is stated in the explanatory memorandum that the revision seeks to support decarbonization, as one of the primary objectives, to achieve the goals of the European Green Deal. It is therefore striking that in the 'Subject Matter' (article 1) this focus isn't replicated in the EP mandate. We fully support the addition of human health, but believe that it is equally important to add decarbonisation as a part of the subject in line with reduction of emissions into air, water and land and preventing the generation of waste. We therefore support the council mandate on this matter.
13a; 59b and 131	Recital 3a; Article 3(1) point 2 and Article 14(1)	Against	It is important for us to stress that we can't support the inclusion of odour as proposed by the EP. For the industrial installations we recognise odour alone as a valid nuisance the local environment, but would prefer not to include odour as suggested in definitions and throughout the amended proposal by the EP, not the least to distinguish clearly between the extremely hazardous substances currently covered, and odour, which in our view is somewhat more of a nuisance on its own and exclusively a local issue. Such amendment, as proposed by the EP, would be an example of over-regulation, as odour on its own not harmful. We must trust the local authorities to regulate, when it is a local issue, which can be compared to noise.
23; 142b; 154; 157; 474b	Recital 13; Article 14(1) subparagraph 2, point e and	In favour (neutral if It is already a part	We are highly supportive of the inclusion of REACH and hazardous substances references several places in the directive as proposed by the EP. The evaluation of the IED concluded that

	article 14a subparagraph 2	of the council mandate)	<p>there is a need to strengthening the link between 2010/75/EU (IED) and 1907/2006 (REACH) to better address the risk of the use of chemicals in installations, to protect both the environment and human health.</p> <p>Firstly, to support this ambition, the inclusion of ECHA in the (Sevilla) process for drafting BREF's is positive and ensures focus on hazardous substances. Secondly, the obligation of the operator to evaluate the use of hazardous substances and analyse the possibility to substitute them with safer alternatives is a step in the right direction. The chemical inventory is linked with the environmental management system (EMS) and will be publicly available. Lastly, we are in favor of amendments – supporting the zero pollution ambition – such as the following:</p> <ol style="list-style-type: none"> <li>1) When setting emission limit values in permits, the competent authority needs to take into account the hazardousness of the substance (Art. 14.1)</li> <li>2) The competent authority must ensure through the permit that the operator, when using the most harmful substances, actively evaluates preventative and emission reduction measures (Art. 14.1)</li> <li>3) In the EMS the operator has to draft environmental policy objectives focusing on the prevention and reduction of the use and emissions of hazardous substances (Art. 14.1.a)</li> <li>4) The chemical inventory is strengthened as it not only focusses on presence of hazardous substances, but also on emissions. Besides the search for safer alternatives, the operator should also assess the reduction of the use and emissions of the most harmful substances (Art. 14.1.a)</li> <li>5) Ensuring that hazardous substances are considered an criteria for determining best available techniques (Annex III)</li> </ol>
26 and 175	Recital 16 and Article 15(3a)	In favour	We are positive towards the EP amendment, ensuring that BAT-AEPLs become indicative, if they are within the lower performing end of the mandatory range. We believe it is a good compromise between the Council mandate and Commission proposal.

370; 374; 374a; 374e and 374f	Article 79	Against (but in favour of L 374a)	The proposals from the EP are very comprehensive. Even though we understand the rationale behind, it would become very difficult to enforce for the competent authorities. However, we find the addition of paragraph 3, point ca, positive as it emphasizes the frequency of violations as stressed in the EP mandate. If an installation continues to violate national provisions, it should result in more significant penalties. We can support a horizontal approach, but at the same time ensuring national flexibility in accordance with the council mandate.
378; 381; 38a; 382a and 382b	Article 79a	Against	We cannot support maintaining paragraph 4, as the reverse burden of causality is not feasible in reality. It would be very costly for an installation to prove that it was not contributing to a claimed damage. Furthermore, there would need to be provided sufficient legal security and predictability, which we believe isn't sufficient provided with paragraph 5a and 5b, in the current proposal from the EP.
89; 90; 91; 92; 93; 94; 95; 96; 96a; 96b; 96c; 208a; 208b; 209 and 209a	Article 5(4) and 24(2)	Against	<p>Denmark supports the diminishing of administrative burdens and therefore doesn't support the EP mandate, in regards to the permit summary. We are against the inclusion of the extensive requirements, as outlined in article 5 paragraph 4 in the EP mandate, and we don't see the need for summarizing information that should already be published and available in the permits.</p> <p>Moreover, with the council mandate it is mandatory to give access online and free of charge. It is thus important to stress that we are not against ensuring that an electronic permitting system are put in place as described in art. 5(2) in the EP mandate, but we support the council mandate on this matter. Denmark would stress, that if the permit summary will be a requirement, we propose to keep it short, non-technical and precise as below:</p> <p>Article 24(2)  <i>"2. When a decision on granting, reconsideration or updating of a permit has been taken after [OP please insert the date = the first day of 24 months following the date of entry into force of this Directive], the competent authority shall make available to the public, including systematically via 3</i></p> <p><i>the Internet, free of charge and without restricting access to registered users., in relation to points (a) and (b), the following information:</i></p>

			<p>(a) the summary of the decision with an overview of the main environmental issues covered by the permit including a link to the permit.</p> <p>(b) Whether any derogation is granted in accordance with article 15(4) and 15(4a). “</p>
239a	Article 27a	Against	We do not understand the need for farmers representatives to assist INCITE, as livestock installations aren't covered by this chapter, and no other narrow and specific group of representatives are mentioned.
253; 254; 255; 256 and 257	Article 27d	In favour (against 258a)	<p>Denmark supports that the transformation plans are adopted by a delegated act rather than an implementing act. We furthermore support the EP proposal to not postpone the deadline for developing the transformation plans far into the future.</p> <p>The provision in 27d(2) relating the inclusion of a transformation plan with the publication of BAT-conclusions implies that the BAT-conclusions would be essential for the development of a transformation plan. In our understanding, the transformation plan is a strategic tool for the installations, which will be revised by the installations when new technology and new possibilities arise towards a greener production. There is no need to delay the transformation plans as the biggest industries already are on this track. In general, we support the EP proposals on this cluster.</p> <p>However, we do not see why there is a need for MS to require operators to assess the benefits of using digital tools.</p>
402a	Annex I(1) point a	Against	We are against the inclusion of onshore oil and fossil gas in point 1.2a, as we do believe it is extensively covered by EU regulation, most importantly the directive (2013/30/EU) on safety of offshore oil and gas operations and especially the international OSPAR-convention.
14; 70; 73b; 447; 447a; 448; 449	Recital 4; Article 3 (23b); Article 3 (23ca); Annex Ia	Strongly against	<p>Firstly, the thresholds for pigs, sows and poultry are in accordance with the existing thresholds in the current and existing directive. This is worrying as the evaluation showed, that there is a need to expand the scope of the directive, not only increase the amount of these installations, but also other agri-industrial activities that causes harmful impacts on health and environment.</p> <p>We are now in a position where neither the Council or EP mandate are acceptable. Both proposals would lead to:</p>

			<p>1) The ambitions and goals from the Green Deal and Zero Pollution, facilitating a sustainable and green industry, are not achievable with the general approach as it stands, due to the few agri-installations covered.</p> <p>2) The thresholds in the council mandate, will only include approximately 6 to 9 % of all farms in EU – the EP mandate is even lower. For cattle, with a threshold of 350 LSU it is only between 1.6 to 2 % of all farms, which means that up to 98.4 % of all cattle farms are excluded from this directive. This means that around 80 % of European ammonia emissions from cattle would continue to be released without any requirements. In the case of the EP mandate, with a threshold of 750 LSU, no substantial number of cattle farms will be covered. The possibility to exempt farms that consist of less than two cows pr. hectare will only increase this drop in ambition.</p> <p>When addressing the possibility to exempt farms if they are “extensive production regimes”, it is important to understand the consequences of such definition. The Task Force on Reactive Nitrogen has provided a paper, that summarizes the consequences.</p> <p>Considering the ‘extensive farming’ definition, there is no commonly agreed definition. We would argue that an agronomic approach should be used. If we consider the threshold at 2 LSU/ha, it would lead to an extensive production regime leading unacceptable NH<sub>3</sub>-emission, N-deposition and exceeds the requirement of the EU Nitrate Directive. The threshold is extremely high, when considering the rationale which is to exclude “small, extensive rearings”, as about 60 % of the EU livestock live on farms below a threshold of 2 LSU/ha. The median EU LSU (including cattle, pig and poultry) lives on a farm with a density of ca 1.6 LSU/ha. In other words, 50% of LSU are on farms with &lt; 1.6 LSU/ha, which means that a substantial share of non-extensive farms would be excluded from the new IED scope, with the result that ammonia and nitrate emissions are likely to be above acceptable levels for the environment.</p> <p>If we are to take the stated objectives behind the IED-revision seriously, which are to reduce emissions of ammonia and nitrates and thereby improving air, water and soil quality, the current</p>
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		<p>negotiation position of both the Council and European Parliament are unacceptable. We thus suggest the following amendments to address the concerns expressed:</p> <p>Annex Ia, paragraph 1  <i>"Rearing of cattle or pigs in installations of 150 livestock units (LSU) or more, excluding rearing of cattle or pigs in installations operating under extensive production regimes, where the stocking density is less than [Insert: <b>0.5 LSU/ha for dairy cows with a production of 8,000 kg milk/year or more and 1 LSU/ha for dairy cows below 8,000 kg milk/year and other cattle, and for pigs less than 1 LSU/ha]</b> [Insert: <b>land with permanent grassland (&gt;5 years)</b>] used only for grazing or growing fodder or forage used for feeding the animals in the installation . [Insert: <b>A threshold of 0.5 LSU/ha shall apply for higher-yielding dairy cows; a threshold of 1 LSU/ha shall apply for the remaining cattle and a threshold of 1 LSU/ha for pigs, to take account of the higher efficiency of pig production)</b>]."</i></p> <p>The point behind creating a new chapter, new operating rules and a simpler permitting (or registration) regime, was to cover more pigs- and poultry rearings and a substantial number of cattle farms for the first time. If we just maintain the same thresholds and basically exclude cattle, there is no real need for a revision of the directive and certainly not a new chapter for these activities. The whole point behind this revision fails.</p> <p>We therefore strongly encourage to – as mentioned above – to lower both the ratio between LSU and ha for ‘extensive production regimes’ and to lower the thresholds for pigs, poultry and cattle farms in accordance with at least the thresholds in the council mandate (L447; L447a and L448) or as proposed below:</p> <p>Annex Ia, paragraph 1  <i>"Rearing of cattle, in installations of 150 livestock units (LSU) or more. "</i></p> <p>Annex Ia, paragraph 2  <i>"Rearing of pigs or poultry in installations of 200 livestock units (LSU) or more."</i></p> <p>Annex Ia, paragraph 3  <i>"Rearing of poultry in installations of 200 livestock units (LSU) or more."</i></p>
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## POLAND

Following the WPE meeting held on 1st September 2023 please find attached in excel file Polish written reaction on chosen amendments to the directive 2010/75/UE on Industrial Emissions (IED) indicated in Presidency note WK 10695/2023 INIT of 29th August 2023.

We would like to additionally highlight the following issues that are important for Poland:

### Art. 5(4)

Poland is in favour to delete permit summary as it was agreed in General approach. Poland is convinced that permit summary would be a relevant administrative burden increasing already significant workload imposed on the Competent Authorities. It should be stressed that it's just one of many additional elements which according to the proposal shall be included in the permit.

Since the entire permit including any changes of thereof is already available online for each IED installation there will be limited added value associated with publication of the summary.

Moreover we would like to stress that IED installations are often very complex what is also reflected in the permit's format. Therefore it may be not feasible to elaborate on this basis a short and comprehensive summary. Also permits conditions for different IED activities types may vary significantly in terms of requirements considered relevant eg. there are totally different priorities for landfill, LCP or car coating, what in practise would mean totally different formats of the summary.

### Art. 79

We fully support agreements in General approach to delete references to the annual turnover and income from the paragraph 2. We would like to highlight such an approach does not fit at all to the systems where various fines rates are assigned to the emitted pollutants. In consequence the amount of fine is proportional to the height of exceedance and its impact on the environment - what reflects well the polluter pays principle. It would be particularly complicated to merge such a system with a rule referring to the annual turnover or income.

Moreover, we should keep in mind that companies with relatively low annual turnover could cause substantial damage in the environment.

### Art. 79a

We strongly support General approach which deleted the text indicating the responsibility of the authorities. Detailed rules related to liability for damages should remain within the competence of the Member States.

### Annex I, point 1.2

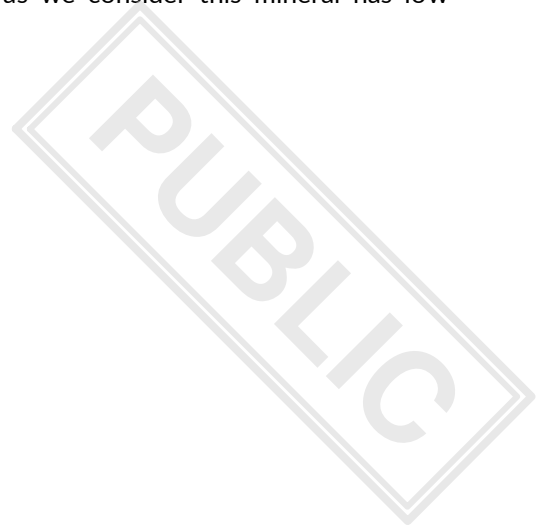
Poland is against EP amendment, that is adding this new activities to the scope of IED. Oil and Gas sector is already highly regulated and its emissions are closely monitored. Furthermore, new regulations (such as methane regulation) are in the pipeline, introducing new requirements on O&G companies.

### Annex I, point 2.3

PL can accept EP amendment. In our opinion, forges (consisting of a hammer or press) are generally not considered significant the sources of pollution and the main environmental impacts do not result directly from operation of hammers (or presses) but rather from heating activities. It also finds it reflected in the ongoing revision of the SF BREF which identified the KEI for the forge, includes energy efficiency and NOx and CO air emissions from kilns heating/reheating. The issue of noise, often associated with the operation of hammers, is already there sufficiently regulated by EU law, including through noise levels.

### Annex I, point 3.6

PL can accept EP amendment to delete point 3.6(a) and leave only activities from point 3.6(b). Although Poland is against including silver as we consider this mineral has low environmental impact.







Council of the European Union  
General Secretariat

Brussels, 07 September 2023

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

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WK 11068/2023 INIT

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## REQUEST FOR CONTRIBUTION

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

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

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Following the call for comments (WK 10677/23 ADD 1), delegations will find attached the comments received from BE, CZ, DK, IT, HU, LV, AT, NL, PL, SK and SE.

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

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WK 11068/2023 INIT

**LIMITE**

**EN**

**WRITTEN COMMENTS – SK – WPE Sept 1, 2023**

Line (of the four column document)	Article (of the revised Directive)	Position (towards EP AM)	Comments (justification)
96	Article 1, first paragraph, point (5), amending provision, numbered paragraph (4), second subparagraph	SK suggests to delete this provision or to extend the deadline by which MS shall submit to the Commission an assessment on the measures needed due to the changes of this Directive.	The reason why SK is proposing a change lies in the fact that measures to make the permitting process more efficient may include the integration of other directives. For this reason, SK is of the opinion that it is difficult to set a fixed deadline for submitting to the Commission an assessment on the measures needed due to the changes of this Directive. SK is also of the opinion that in the event that the Commission considers that this article constitutes a large administrative burden, SK proposes to remove this article.
113a	Article 1, first paragraph, point (6), amending provision, Article 8, paragraph 2a (new)	SK thinks that this should be investigated further.	
59d	Article 1, first paragraph, point (3)(-b), amending provision, Article 3, paragraph 1, point (2a new)	SK proposes to delete this provision.	Provision concerning definition of olfactory pollution is according to SK too general and there is need to clarify in more detail how to establish if the sickness is caused by the installation and not by for example local heating.

Chapter 2 (of the four column documents) Division 1 (of 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 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1992)	Section (of each EP 600)	Comments (if available)
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Line (of the four column document)	Article (of the revised Directive)	Position (towards EP AM)	Comments (justification)
59b	5 (2)	against	No added value to the change of the definition to include odour.
59d	3 (2a)	against	No added value to have specific definition of olfactory pollution.
61d	3 (5a)	against	The current EP text on relevant environmental performance levels is very unclear and confusing. However, CZ could agree with the idea of binding lower (less stringent) levels with possibility
65	3 (13a)	against	The current EP text on relevant environmental performance levels is very unclear and confusing. However, CZ could agree with the idea of binding lower (less stringent) levels with possibility of derogation and indicative higher (more stringent) levels.
73b	3 (23ca)	against	No added value to the definition. It is not used in subsequent text.
78	3 (51)	against	The current EP text on relevant environmental performance levels is very unclear and confusing. However, CZ could agree with the idea of binding lower (less stringent) levels with possibility
96a	5 (4a)	against	No added value. Administrative burden.
96b	5 (4b)	against	No added value. Administrative burden. It is a parallel authorisation model that would be used very rarely.
114	8 (3)	red line	Critical infrastructure (district heating plants, etc.) could be closed down by such a strict formulation.
116c	11 (c)	against	No added value to have specific link to olfactory pollution.
131	14 (1) (a)	against	No added value to cover odour in this provision.
175	15 (3a)	against	The current EP text on relevant environmental performance levels is very unclear and confusing. However, CZ could agree with the idea of binding lower (less stringent) levels with possibility of derogation and indicative higher (more stringent) levels.
183a	15 (4a)	against	The current EP text on relevant environmental performance levels is very unclear and confusing. However, CZ could agree with the idea of binding lower (less stringent) levels with possibility of derogation and indicative higher (more stringent) levels.
258d	30 (5)	against	Generally against opening up new technical parts of the IED for discussion.
262a – 262n	42 / 58 / 63 / 64 / 70	against	Generally against opening up new technical parts of the IED for discussion.
269a	70a	against	The EP provision is related to the regulation of the market and not to the protection of the environment.
275	70c	red line	The EP provision would prevent the registration procedure from being applied to farms already covered by the IED. Therefore, the potential to reduce administrative burden would not be realised.
332	70i (2)	red line	Against the adoption of operating rules as a delegated act.
347a	74 (2a)	red line	Against the extension of Annex I via delegated act.
347b	74 (2b)	red line	Against the extension of Annex I via delegated act.
370	79 (2)	red line	Strong support of GA. EP text goes against principle of subsidiarity.
374e	79 (3a)	against	Strong support of GA. EP text goes against principle of subsidiarity.
379	79a (2)	red line	Strong support of GA. EP text goes against principle of subsidiarity.
381	79a (4)	red line	Strong support of GA. EP text goes against principle of subsidiarity.
381a	79a (4a)	red line	Strong support of GA. EP text goes against principle of subsidiarity.
382a	79a (5a)	red line	Strong support of GA. EP text goes against principle of subsidiarity. Administrative burden.
382b	79a (5b)	red line	Strong support of GA. EP text goes against principle of subsidiarity. Administrative burden.
402a	Annex I (1.2a)	against	In general, the IED is not an optimal regulatory tool for such a specific activity as gas exploration.
402b	Annex I (1.2b)	against	In general, the IED is not an optimal regulatory tool for such a specific activity as gas exploration.
474g - 474n	Annex IV - Annex VI	against	Generally against opening up new technical parts of the IED for discussion.

