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Link between IPPC and EMAS in UK - Cement Sector Regulation

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Context

- **EMAS Registrations in UK**
 - 70 Organisations (370 Sites)

- **Environment Agency in England & Wales**
 - Around 3500 PPC Permits
 - 11 Cement Sites England & Wales (5 EMAS)
 - 1 Cement Site in Scotland (1 EMAS)
 - 2 Cements Sites in Northern Ireland (1 EMAS)

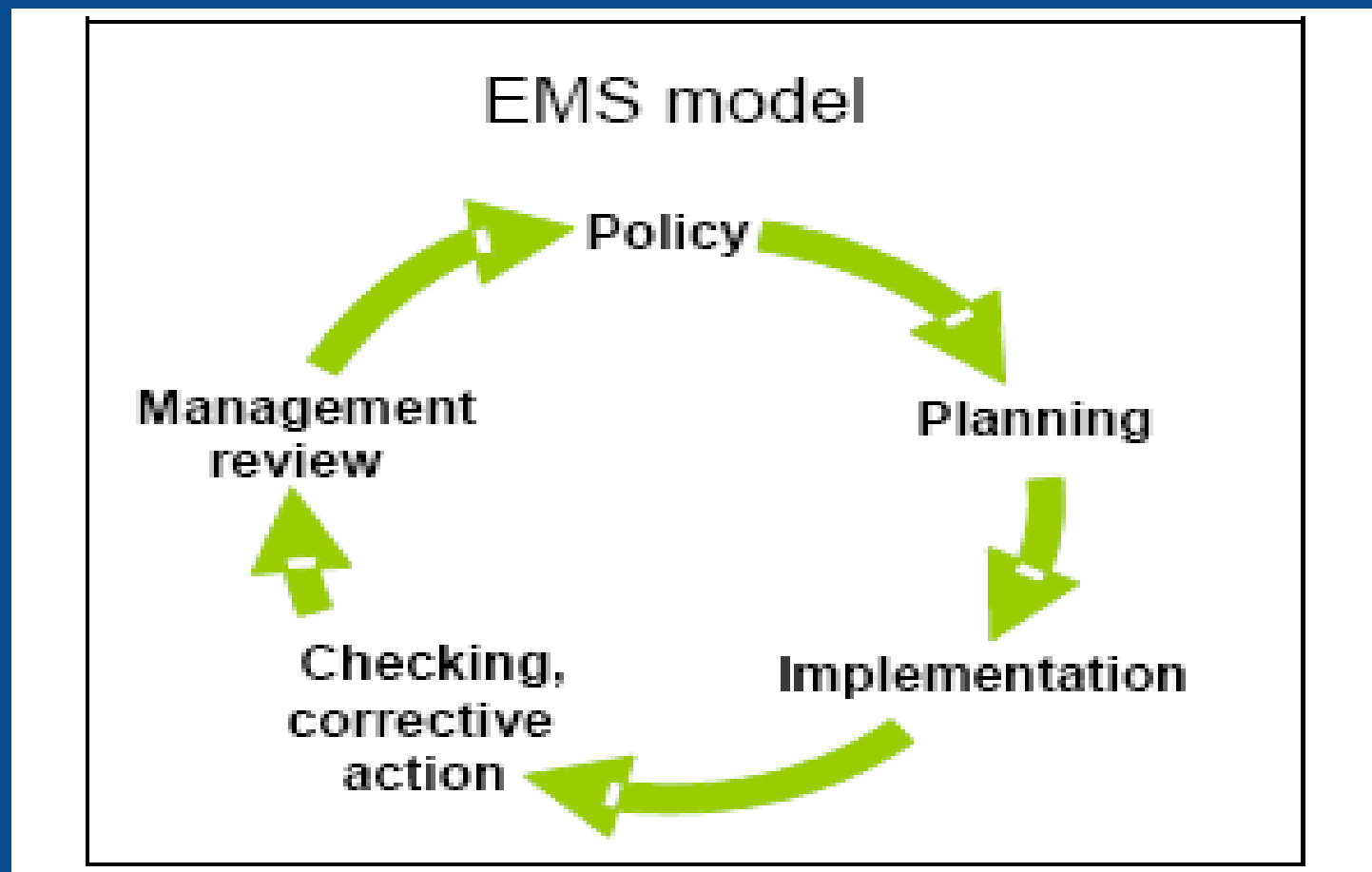
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PPC Cement & Lime BREF Note – EMS (1)

PPC 'model' for site EMS:



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PPC Cement & Lime BREF Note – EMS (2)

PPC Site EMS must include:

- Commitment of Top Management
- Environmental Policy that includes Continuous Improvement
- Planning Objectives and Targets in conjunction with Financial Planning and Investment
- Implementation of Procedures
- Checking Performance and taking Corrective Action
- EMS Performance Review by Top Management

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PPC Cement & Lime BREF Note – EMS (3)

In addition, for the Cement Sector:

- *Where practicable*, application of sectoral benchmarking on a regular basis, including;
 - energy efficiency and energy conservation activities, choice of input materials,
 - emissions to air, discharges to water, consumption of water and generation of waste

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PPC Cement & Lime BREF Note – EMS (4)

Notable items included as ‘voluntary’:

- Independent Audit
- External verification by accredited certifier
- EMAS registered or ISO14001 certified
- Preparation and publication (and possibly external validation) of a regular environmental statement describing;
 - all the significant environmental aspects of the installation,
 - allowing for year-by-year comparison against environmental objectives and targets and sector benchmarks

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Cement Sector Regulation – Challenges

- Emissions to Air
 - NO_x
 - Particulate
 - SO₂
- Climate Change – CO₂ emissions
- Noise / Odour / Dust from Site
- Compliance with Permit
- Poor Public Perception – Stakeholder Engagement
- Resource Efficiency (e.g. waste reduction and re-use)
- Continuous Improvement – Benchmarking

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PPC Regulation – EMAS Benefits

- Recognition given by reduced regulation fees - systematic, organised approach to management, documentation, training and competence
- Company with EMAS provide good quality annual environment report covering each of their sites, in addition to reports to regulator
- Review in progress looking at additional incentive schemes recognising EMAS
 - Taking into account Remas project findings
 - UK Government initiatives

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Cement Sector Regulation / Intervention

- Permitting and inspection under the PPC Directive
- Sites with accredited certified EMS have audits from their certification body – independent from Regulator
- Voluntary agreement with the Trade Association representing the cement companies in the UK – *‘Cement Sector Plan’*
 - Recognition that all sites have an accredited certified EMS
 - Need to have continuous improvement and benchmarking

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Cement Sector Plan

WHAT ARE SECTOR PLANS?

Sector Plans are a joint venture between various industry sectors and the Agency.

They aim to establish objectives and improvement targets for environmental performance over the next 5 to 15 years.

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Cement Sector Plan

- The plan is a voluntary agreement - achieving its objectives is outside our regulatory obligations.
- Some of the targets will be met as a result of regulatory efforts, but they cannot be translated directly into permit conditions.
- The targets are not enforceable.

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Cement Sector Plan

- Regulator and the cement sector have agreed to report annually against the performance indicators and progress towards meeting the targets.
- The sector plan includes targets for the Regulator, as well as the industry.

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Proposal Being Discussed

- **5 Objectives**
 - **19 Performance Indicators**
 - **16 reported by industry**
 - **3 reported by Environment Agency**
 - **Targets set for 2010 and 2015**
 - **Industry Aspirations against objectives for 2020**

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Cement Sector Plan

Objectives

- **Objective 1:** *To Increase The Use Of Waste Used As Raw Materials and Fuel at Cement Works (Resource Efficiency)*
- **Objective 2:** *To Reduce Waste Disposal from Cement Manufacturing*
- **Objective 3:** *To reduce Air Pollution from Cement Manufacturing.*

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Cement Sector Plan

Objectives

- **Objective 4:** *To Reduce Emissions of Greenhouse Gases per tonne of Cement*
- **Objective 5:** *To Improve Regulatory Compliance and Stakeholder Perception of Cement Works*

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Example of Sector Plan Objective

Reduce Emissions to Air	Units	1998 Base	2006 Actual	2010 Target
Dust Emissions	kg/te	0.33	0.13	0.15
NOx Emissions	kg/te	3.34	2.41	2.50
SO2 Emissions	kg/te	2.56	1.06	1.10

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EMAS Status in UK Regulation

- **Low uptake of EMAS registration by regulated sites in UK**
- **Sites with EMAS not always in ‘better in class’ performers**
- **Regulatory fee reduction for EMAS is small**
- **Studies have contributed to greater understanding of the link between Environmental management and performance (e.g. Remas Project – 2002-2006)**

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EMAS & Regulation in UK – Where Next?

- Recognise EMAS as a tool to help industry achieve better environmental outcomes.
- Reinforce that EMAS must deliver measurable outcomes that benefit the environment - Present to some degree, but is it as 'guaranteed' as we would like? (e.g. Deliver legal compliance and benchmarking)
- Currently recognise possession of EMAS and give credit for it under our risk-based charging scheme – Currently reviewing incentives following remas project findings

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IPPC and EMAS in UK - Cement Sector Regulation

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