

Concerning the simplification of the Titanium Dioxide Directives we have the following comments and questions.

Our first thought is that there can be a further simplification when the BREF on LVIC-S (IPPC Directive) were to be taken into account. It should be possible that in this BREF there will be an adequate description of the present situation in the Titanium Dioxide production in Europe and that it will contain all necessary guidelines and regulations. Perhaps combining the directives with the BREF can lead to one document and the Directives can then be withdrawn. If this is not feasible, than at least the texts of both documents should be in line with each other.

It is likely that the Directives are at some points outdated. The definitions of solid wastes as mentioned in article 2 are no longer covering those in todays practice. Coordination with the TWG for the BREF on LVIC-S therefore is really necessary. The same goes for the limitations mentioned in article 4. In the draft BREF not chloride quantities are mentioned, but the quantities of the metals.

There is a shift in raw materials use, but also in production processes. A problem with the present titanium dioxide production is that the use of ores with high TiO₂ contents such as rutile is more and more difficult because the resources are getting exhausted. The use of other raw materials will lead to more waste production. This can be dealt with by reuse of this waste as secondary building materials. For this reason the emission limit values as described in article 4 are disputable.

We wonder if it is still usefull to have a special directive for titanium production, in which monitoring is prescribed for the waste removal. First of all these wastes should be limited to as low as possible by now, if not eliminated at all. Secondly there are no directives for monitoring for other types of waste. Thirdly, this type of monitoring can be covered in the BREFs under the IPPC Directive.