



Günter Verheugen
Vice-President of the European Commission
European Commission
Rue de la Loi 200
1049 Brussels

3 January 2008

Dear Vice-President,

Impacts for industry of EU legislation on environmental pollution

On 21 December the European Commission published its proposal on a revision of the Integrated Pollution Prevention Control (IPPC) Directive. In 2008 the Commission will in addition propose a directive to set national emission ceilings for air pollutants by 2020. While fully acknowledging the important task of reducing environmental pollution BUSINESSEUROPE is seriously concerned that these directives will impose a disproportionate cost on industry, leading to production cuts in Europe rather than to further innovation and investment in clean technologies.

The key feature in the current IPPC system, which regulates industrial emissions, is that Member States have the flexibility to grant environmental permits by taking into account the technical characteristics of the industrial installation, geographical conditions and local environmental needs. This flexibility must be fully preserved. Unlike greenhouse gases, the emission of pollutants like NO_x, SO₂ or fine particles has different effects on health and environment depending on how and where they are emitted. Disregarding local environmental needs is in contradiction with better regulation principles and the Commission's own approach in its Thematic Strategy on Air Pollution.

With respect to national emission ceilings BUSINESSEUROPE counts on you to ensure that, first, the upcoming directive proposal will set realistic emission ceilings after an impact assessment that closely involves industry, and that, second, industry will not have to take additional measures which go beyond the existing IPPC system.

We will be happy to discuss these issues with you in more detail.

Yours sincerely,

Philippe de Buck

CC:

- Commissioner Stavros Dimas, DG Environment
- Mr. Andris Kesteris, Head of Cabinet, DG Energy