European Union Network for the Implementation and Enforcement of Environmental Law

The IED Baseline Report

IMPEL project on the implementation by Member States of the Baseline Report as required by the Industrial Emissions Directive

Final report: 17 March 2016

Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the EU Member States, acceding and candidate countries of the European Union and EEA countries. The association is registered in Belgium and its legal seat is in Brussels, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 7th Environment Action Programme and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

Information on the IMPEL Network is also available through its website at:
www.impel.eu

Title report: The IED Baseline Report – IMPEL project on the implementation by Member States of the Baseline Report as required by the Industrial Emissions Directive	**Number report:** **2015/24**
Project manager: Aurélie Dulière – Jean-Pierre Janssens	**Report adopted at IMPEL General Assembly:** Spring 2016
Authors: Aurélie Dulière - Jean-Pierre Janssens	**Number of pages:** 26 Report:10 Annexes: 16
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Executive summary: The aim of the project was to identify key topics and challenges regarding the implantation of the IED baseline report, relying on a project team with members coming regions of Europe with very different industrial landscapes, which allowed for of wide variety of approaches. A questionnaire based on the Guidance published in 2014 by the Commission was established. A follow up of this project is planned in 2016.	
Disclaimer: This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations or the European Commission.	

Table of Contents

1 Introduction 5

2 Motivation of the project 6

3 Realisations during the project 8

4 Conclusion and follow up 10

List of Annexes:

I Terms of reference
II Meeting program
III Presentations
IV Questionnaire

1 Introduction

Improving implementation of environmental law is a key priority for the European Commission. This has been once more highlighted by the 7th Environment Action Program, into force since January 2014.

The Baseline Report is a soil quality assessment required by Directive 2010/75/EU on industrial emissions prior to the start of an IED installation, or at the first renewal a the permit for existing activities. The aim of this procedure is to establish the baseline state of the soil and groundwater on the site, in order to be able to assess the presence of a contamination due to the activity at the definitive closure of the site.

The intent of this project was to identify key challenges and best practices, given the variability of experience and policies on the subject of soil contamination management among Member States.

2 Motivation of the project

The minimum expectations concerning the IED Baseline report were detailed in a communication of the Commission: "European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions" (2014/C 136/03). This communication has been published on 6/5/2014.

The Baseline Report has been introduced in European law since only a few years. Nonetheless, some Member States have already acquired a considerable experience regarding soil investigations, with well established procedures based in some cases on decades of practical experience.

The aim of the IED Baseline Report is primarily the assessment of the soil quality at the start or the renewal of the permit of an industrial activity as to establish an initial state. The objective is to provide a basis for comparison upon definitive closure of the activity, as to make possible the application of the "polluter pays principle" on an objective basis.

On the other hand, the management of contaminated sites has been since a long time a strategic issue in the whole Europe because the presence of a soil pollution compromises the possibility of a good and efficient land planning. In particular in the context of industrial activities, it has been frequently observed that the lack of legal framework regarding the assessment and the management of soil pollution is often a deterrent for investors to choose to settle a new industrial activity in a polluted area. In the absence of clearly established rules and procedures, the legal insecurity creates too many financial risks for projects, pushing investors to choose others areas, sometimes to the detriment of other land use such as agriculture, natural areas or housing, and ultimately leaving brownfields to the care, and charge, of public authorities.

We are therefore convinced that more detailed procedures for the establishments of Baseline Reports could be an asset not only for the application of the polluter pays principle when needed, but also in the resignation of contaminated areas for industrial use.

Better implementation of the IED Baseline Report means also more efficient procedures, leading to better knowledge of the state of the soil for a lesser investment in terms of duration and cost of investigations. This can be achieved through a more narrowed targeting of field works. Giving the varying level of regulatory and practical experience in this matter among Members States, IMPEL could use the existing experience in its network to gather the best practices in place and identify key factors

of representability in soil investigations as to help promote a both efficient and pragmatic approach to the development of Baseline Reports.
It could also identify key challenges in implementation and practical enforcement, as well as solutions to these that have already been put in place by the practitioners.
The findings will be shared among members as to help improve practices in the whole Europe, aiming at the creation of a level playing field on this particular matter.

3 Realisations during the project

Due to the delayed start of this project (approval was communicated at the end of the month August), it was not possible to realize all the actions presented in the ToR as the project started 3 months later than planned. For the same reason and given the time needed for a tendering, it was not possible to hire a consultant as planned, therefore his work had to be done internally by the team leaders.

A meeting was held in Brussels on 29th and 30th September 2015. During this first meeting (see program Annexe II), the team members presented the existing procedures and the field practice on the implementation of the Baseline Report by the authorities represented in the project team. The presentations and reference documents communicated by the team members were uploaded to Basecamp.
As expected, this allowed us to realize the variability in approaches due to a number of factors among which the type of industrial fabric in a given region seemed determinant. Indeed, the challenges faced on the topic of soil contamination in general and the Baseline report in particular are very different from the perspective of an urban region with a rich industrial past and a lot of SME's but few active IED installations like Brussels, a country where the IED installations are mainly linked to the agricultural sector like Cyprus, and regions with a wide variety of big industrial and agricultural facilities like Lombardy and Braunschweig. This is something to keep in mind in order to produce a guidance that will meet the needs of all the Member States.

The team members then examined the European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions" (2014/C 136/03). This communication has been published on 6/5/2014 and details the minimum expectations concerning the IED Baseline report. During an extended brainstorming, all the dispositions of the EC Guidance were discussed in order to identify which notions or topics needed further explanations or clarifications.

It was decided to establish the questionnaire following the canvas of the EC Guidance, in order to use a base that is already widely known and used by Member States. The team leaders were in charge of the gathering and

the synthesis of the elements brought up by team members during the discussions in order to produce a draft questionnaire.

The intention was to hold a second meeting at the end of the year to discuss the draft questionnaire, but given the late start of the project, this second meeting did not take place. Moreover, the situation in Brussels at the time made any travel difficult to plan.

4 Conclusion and follow up

This project allowed us to identify topics of focus for a future guidance and areas where examples of best practices could be best used by Member States regarding the implementation of the Baseline Report. In this process, the variety of background and types of industrial fabric represented among the project team members was a real asset.

As it was not possible to realise all what was initially planned, the circulating of the questionnaire and the analyse of the answers will be moved to a future follow up project in 2016.

ANNEXE I Terms of reference

TOR Reference No.:	Author(s): A.Dulière (Brussels Environment , Belgium)
Version: final	Date: 20.03.2015

TERMS OF REFERENCE FOR WORK UNDER THE AUSPICES OF IMPEL

1. Work type and title

1.1 Identify which Expert Team this needs to go to for initial consideration	
Industry	☑
Waste and TFS	☐
Water and land	☑
Nature protection	☐
Cross-cutting – tools and approaches -	☐
1.2 Type of work you need funding for	
Exchange visits	☐
Peer reviews (e.g. IRI)	☐
Conference	☐
Development of tools/guidance	☑
Comparison studies	☑
Assessing legislation (checklist)	☐
Other (please describe):	☐
1.3 Full name of work (enough to fully describe what the work area is)	
The IED Baseline Report – IMPEL project on the implementation by Member States of the Baseline Report as required by the Industrial Emissions Directive	
1.4 Abbreviated name of work or project	
The IED Baseline Report	

2. Outline business case (why this piece of work?)

2.1 Name the legislative driver(s) where they exist (name the Directive, Regulation, etc.)
Improving implementation of environmental law is a key priority for the European Commission. This has been once more highlighted by the 7th Environment Action Program, into force since January 2014. The Baseline Report is required by Directive 2010/75/EU on industrial emissions. The minimum expectations concerning the IED Baseline report were detailed in a communication of

the Commission: "European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions" (2014/C 136/03). This communication has been published on 6/5/2014.

2.2 Link to IMPEL MASP priority work areas

1. Assist members to implement new legislation	☑
2. Build capacity in member organisations through the IMPEL Review Initiatives	☐
3. Work on 'problem areas' of implementation identified by IMPEL and the European Commission	☑

2.3 Why is this work needed? (background, motivations, aims, etc.)

The Baseline Report has been introduced in European law since only a few years. Nonetheless, some Member States have already acquired a considerable experience regarding soil investigations, with well established procedures based in some cases on decades of practical experience.

The aim of the IED Baseline Report is primarly the assessement of the soil quality at the start or the renewal of the permit of a industrial activity as to establish an intial state. The objective is to provide a basis for comparison upon definitive closure of the activity, as to make possible the application of the "polluter pays principle" on a objective basis.

On the other hand, the managment of contaminated sites has been since a long time a strategic issue in the whole Europe because the presence of a soil pollution compromises the possiblity of a good and efficent land planning. In particular in the context of industrial activities, it has been frequently observed that the lack of legal framework regarding the assessement and the management of soil pollution is often a deterrent for investors to choose to settle a new industrial activity in a polluted aera. In the absence of clearly established rules and procedures, the legal insecurity creates too many financial risks for projects, pushing investors to choose others areas, sometimes to the detriment of other land use such as agriculture, natural aeras or housing, and ultimately leaving brownfields to the care, and charge, of public authorities.

We are therefore convinced that more detailed procedures for the establishments of Baseline Reports could be an asset not only for the application of the polluter pays principle when needed, but also in the redesignation of contaminated areas for industrial use.

Better implementation of the IED Baseline Report means also more efficient procedures, leading to better knowledge of the state of the soil for a lesser investment in terms of duration and cost of investigations. This can be achieved through a more narrowed targeting of field works.
Giving the varying level of regulatory and pratical experience in this matter among Members States, IMPEL could use the existing experience in its network to gather the best pratices in place and identify key factors of representativity in soil investigations as to help promote a both efficient and pragmatic approach to the development of Baseline Reports.
It could also identify key challenges in implementation and pratical enforcement, as well as solutions to these that have already been put in place by the practitioners.
The findings will be shared among members as to help improve pratices in the whole Europe, aiming at the creation of a level playing field on this particular matter.

2.4 Desired outcome of the work (what do you want to achieve? What will be better /

done differently as a result of this project?)

We intend to produce an listing of the existing procedures among our members and an analysis of the best practices already implemented.
Members could benefit from the knowledge and experience already in place and take whatever they find applicable to their needs.

2.5 Does this project link to any previous or current IMPEL projects? (state which projects and how they are related)

This project has a clear link to the DECO Project – IMPEL Project on decontamination and monitoring procedures of groundwater and soils in polluted ex-industrial sites.
The DECO project dealt with decontamination and monitoring procedures on ex-industrial sites, whereas this new project concerns investigation procedures on active industrial sites, or on brownfields in the perspective of their reaffection to industrial activity.

3. Structure of the proposed activity

3.1 Describe the activities of the proposal (what are you going to do and how?)

1. Desktop Exercise- review key existing documents to inform the drafting of a questionnaire and interview questions. This will also define key stakeholders and appropriate people to engage with or within Impel and other associated networks dealing with this type of implementation issues.
2. Questionnaire/Interviews. Questionnaire and guidance will be drafted by the consultant. The drafted documents will be discussed and finalized by the project team members during a first project team meeting. The questionnaire will be then circulated among IMPEL members. Interviews are currently not included in the consultant fee, they might be conducted by project team members.
3. Analysis – identify best practices and key implementation challenges, as well as future focus for work on this subject within the IMPEL Network (The results could be the focus of an IMPEL workshop in 2016, and if the results prove satisfactory, the same methodology could be used for further steps in process of the management of soil contamination: soil and groundwater contamination delimitation assessments, risk/impact analysis etc).
4. Report writing- the report will be prepared by the consultant along the lines determined by the project team and reviewed by the project team during the second and last project team meeting to ensure the report is fit for purpose .
5. IMPEL approval – Report to be circulated to IMPEL Members by written procedure to ensure appropriate engagement with IMPEL Members and their organisations. The report will be submitted for approval during IMPEL general assembly in December 2015.

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3.2 Describe the products of the proposal (what are you going to produce in terms of output / outcome?)

A report gathering :

- The information exchanged among IMPEL Member States on the implementation of the Baseline Report, considering administrative and technical procedures and financial aspects,

on the basis of exchange of knowledge and information of participating IMPEL members.
- Good practices examples, aiming at efficiency and representativeness of the investigations procedures leading to the establishment of the Baseline Report.
- Key challenges identified during the study and when applicable the already existing responses to them.

3.3 Describe the milestones of this proposal (how will you know if you are on track to complete the work on time?)

1. Planning activities June- July 2015
2. Defining the work - July
3. Engaging consultants - early September 2015
4. Conduct Desk based research and analysis –September 2015
5. **Project team meeting** : Draft Questionnaire + identify stakeholders for interview's (if possible/needed) and prepare guidance- end of September 2015
6. Circulating questionnaire & interviews – mid October 2015.
7. **Project team meeting**: analysis of results /draft final report - mid November 2015
8. Final Report completed End –November 2015
9. Final Report submitted for approval to IMPEL General assembly- December 2015

3.4 Risks (what are the potential risks for this project and what actions will be put in place to mitigate these?)

1. Tight timescale for delivery – this will be managed by engaging a consultant to support the project team
2. Reluctance of national experts to uncover existing difficulties/implementation issues in their national administration while answering questionnaire. Clear assurances will be given that responses will be anonymized and treated confidentially. If such implementation issues are reported, they will never be linked to individual authorities or Member States.

4. Organisation of the work

4.1 Lead (who will lead the work: name, organisation and country) – this must be confirmed prior to submission of the TOR to the General Assembly)

Brussels Environment-IBGE (BE, Brussels-Capital Region, Belgium)

4.2 Project team (who will take part: name, organisation and country)

1. Aurélie Dulière (BE, Belgium)
2. Jean-Pierre Janssens (BE, Belgium)
3. Guiseppe Sgorbati (Arpa Lombardia, Italy)
4. to be decided (Italy)
5. expert from IMPEL Industry expert team (to be decided by Horst Buther)
6. to be decided

4.3 Other IMPEL participants (name, organisation and country)
/
4.4. Other non-IMPEL participants (name, organisation and country)
/

5. High level budget projection of the proposal. In case this is a multi-year project, identify future requirements as much as possible

	Year 1 (exact)	Year 2	Year 3	Year 4
How much money do you require from IMPEL?	11180			
How much money is to be co-financed	/			
Total budget	11180			

6. Detailed event costs of the work for <u>year 1</u>

	Travel € (max €360 per return journey)	Hotel € (max €90 per night)	Catering € (max €25 per day)	Total costs €
<u>Event 1</u>	2160	630	300	3090
project team meeting 1				
End September				
Brussels				
7				
2 days/3 nights				
<u>Event 2</u>	2160	630	300	3090
Final project team meeting				
Mid November				
<Location>				
7				
2 days/3 nights				
<u>Event 3</u>				
<No. of participants>				
<No. of days/nights>				
<u>Event 4</u>				

<Location>				
days/nights				
Total costs for all events	4320	1260	600	6180

7. Detailed other costs of the work for year 1

7.1 Are you using a consultant?	☑ Yes ☐ No
7.2 What are the total costs for the consultant?	5000
7.3 Who is paying for the consultant?	IMPEL
7.4. What will the consultant do?	The consultant will draft the questionnaire and the final report
7.5 Are there any additional costs?	☐ Yes ☑ No Namely:
7.6 What are the additional costs for?	/
7.7 Who is paying for the additional costs?	/
7.8. Are you seeking other funding sources?	☐ Yes ☑ No Namely:
7.9 Do you need budget for communications around the project? If so, describe what type of activities and the related costs	☐ Yes ☑ No Namely:

8. Communication and follow-up (checklist)

	What		By when

8.1 Indicate which communication materials will be developed throughout the project and when ***(all to be sent to the communications officer at the IMPEL secretariat)***	TOR˅ * Interim report˅ * Project report˅ * Progress report(s) ˅ Press releases News items for the website˅ * News items for the e-newsletter Project abstract˅ * IMPEL at a Glance ˅ Other, (give details):	☑ ☑ ☑ ☐ ☐ ☑ ☐ ☑ ☐ ☐	April 2015 Mid-October 2015 End November 2015 January 2016 January 2016
8.2 Milestones / Scheduled meetings (for the website diary)	Project team meeting 1 end of September Project team meeting 2 mid-November		
8.3 Images for the IMPEL image bank	☐ Yes ☑ No		
8.4 Indicate which materials will be translated and into which languages	/		
8.5 Indicate if web-based tools will be developed and if hosting by IMPEL is required	/		
8.6 Identify which groups/institutions will be targeted and how	The Authorities of Member States involved with IED inspection and permitting		
8.7 Identify parallel developments / events by other organisations, where the project can be promoted	Impel Industry Expert Team		

˅*) Templates are available and should be used. *) Obligatory*

9. Remarks

Is there anything else you would like to add to the Terms of Reference that has not been covered above?

ANNEXE II Meeting Program

IED Baseline report – Project meeting 1

29th & 30th September 2015- Brussels, Belgium

Program

Tuesday 29 th September- Day 1

1. Round table : **short presentation of the participants** (experience in soil investigations, expectations regarding the project and its outcome)
2. Presentation of Bruxelles Environnement - Leefmilieu Brussel (Jean-Pierre Janssens, director of Inspection and Soil at BE)
3. Presentation of the Terms of reference for the IED baseline report project (Aurélie Dulière)
4. Implementation of IED Baseline Report in the Brussels Capital Region (Wouter François)
5. **Implementation/approach of IED Baseline Report from the other participants**
6. Brainstorming about the questionnaire

Wednesday 30th September - Day 2

Start of the meeting at 9 :30 am

1. Synthesis of the discussions on day 1
2. Continuation of the discussion
3. Conclusion

End of the meeting 13 :00

ANNEXE III Questionnaire

IED Baseline Report Questionnaire

Scope and Purpose of this questionnaire

What is the purpose of this questionnaire?

Following the publication of the EC guidance on IED baseline report in 2014 and more generally in order to facilitate implementation of the IED baseline report by its members, Impel would like to identify key issues and gather best practices /practical solutions already in place.

We therefore ask your help by completing this questionnaire and sharing with us your experience. For your facility, the structure is based on the EC guidance on IED baseline report, thus following the 8 stages in producing a baseline report

The results of this questionnaire will be further studied and detailed during a workshop in 2016. The results will be part of the general Impel Guidance Book on IED implementation.

Who should complete this questionnaire?

The person completing this questionnaire should be an expert familiar with the implementation of the IED baseline report and the EC guidance.

Please indicate your details (Name, First Name, organisation, position , telephone number and e-mail address for further contact):

Preliminary questions

Those questions will help us to get a better understanding of the context of implementation of the IED baseline report in your country/region

1. Competent authority
    - Which organization in your country is the authority competent for issuing guidelines regarding the IED Baseline Report and is it operating at a national, regional (or other) level? :
    - Is the authority responsible for issuing guidelines the same as the one enforcing and controlling the IED Baseline Report ? If not, please specify
2. Do you have a specific guidance document for IED BR, different from the EC guidance?
    - If yes, please indicate the reference/title of this document and join the document or a link. If available, an English version will be appreciated.

    Do you have another general legal framework on soil contamination? If yes, does it cover also the IED Baseline report specifications or do you have separate procedures (one general procedure, one for IED installation)?

3. In your country/region:
    - Are Baseline reports made by a public organization or by specialized private companies?
    - Is there an specific accreditation needed for the redaction of a Baseline report?
    - Are “best practices” guidebooks available concerning the field works (core drilling, sampling, ..etc.) ? (If yes, please indicate how we can access to it)

- Is a formal approval of the baseline report by the competent authority mandatory? Does the authority review the Baseline report and (if necessary) demand more information or other investigations before approval?
  Is the validity of the Baseline report limited in time? If yes please specify.
- Are there financial support/subsides to the realisation of baseline report in your country/region

4. Our intention is to organize during the year 2016 a workshop to gather a limited number of key experts from different Member States to present and detail best practices and practical solutions to implementation issues identified during this questionnaire exercise.

   If an expert from your organisation would be happy to participate to this workshop, please indicate his details below and his specific area of expertise.

Stage 1-3 is a BR actually needed?

Stage 1: identifying the hazardous substances (HS),
HS are defined in the EC guidance as "*substances or mixtures as defined in Article 3 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures (hereafter "CLP Regulation")"*

1. Are all HS considered at this stage or are some excluded and if so on what base?

2. What about hazardous waste: is the storage of hazardous waste taken into account to determine if a BR is needed, considering waste are not considered under "CLP regulation?

3. Do you consider only HS linked to IED activities on the site or also HS used/stored/produced/released linked to non IED activities in the installation?

Stage 2: are the hazardous substances relevant?
According to the EC guidance, to assess relevance we have to take into account the following characteristics of the substances: hazardousness, mobility, persistence and biodegradability (as well as other characteristics), capability of the substance to contaminate the soil or/and groundwater
-Do you have a guidance for identifying relevant substances? (if yes, please join the document or a link)
-Concerning hazardousness, did you have a defined list of H-phrases that are excluded or included to help identify relevant substances?
- Concerning other characteristics than hazardousness, did you elaborate fixed criteria to determine relevance, or is it a case by case decision?
- Is hazardousness from the combination of substances that could potentially occur in case of leak/incident taken into account?
-Is hazardousness from potential degradations products taken into account?

Stage 3: is there a potential risk of pollution?

- Based on Quantities:
    - Are there fixed minimal thresholds for the quantity of certain hazardous products under which a BR is not mandatory? If yes please join a document to detail the applicable thresholds and if possible a short explanation of how the thresholds were decided.

- Based soil and groundwater characteristics of the site:
    - Based on your experience, are there cases when a BR should not required based on the soil and groundwater characteristics? If yes , please specify.
- Based on the characteristics of existing installations:
    - What types of motivation could you accept to decide that the risk of soil contamination is neutralised (no significant threat) so that a BR is not required (ex: type of industrial process, mandatory or voluntary preventive measures)?
    - Is the presence of sensitive targets (such as a school, housing, drinking water wells, water bodies, Natura 2000 areas,…) in a certain radius around the site taken into account?
    - Is there a control of the installation by authorities prior to the decision?

Stage 4 to 6 : Site study

Stage 4 - Site history

- What sources of information are available to operators for establishing the site history? (for example: an inventory of potentially contaminated sites, permit archives ..)
- How far in time do they have to go back?
- What if the authorities in charges of assessing the BR has more/other information on the site history?
- What is the extension of the site for site history: for example: based on propriety limits, the whole operation site , or only the location of the IED installations?

Stage 5 site description

- How do you identify the limits of site?

- Do you have a definition of site? *If so, p*lease specify:

Stage 6 Assessment of available data

1. How do you assess if available data are still relevant (for example: is there a time limit?)

2. How do you satisfy to stage 6 with existing available data

Site 7 and 8: Field investigations and reporting

Stage 7: Site investigation

- Do you have guidance for site investigation strategy (how to decide the number of samples needed? depths, number of wells? Positioning?)

- How do you determine analysed substances

- Do you take degradation products (metabolites) into account for analysis?

- Are there parts of an operation site that are excluded of the investigations?

Stage 8: Report

- Is there a mandatory template/structure for the BR?

- How is the BR communicated to the authority (electronically?)

- Is an approval of the BR by this authority necessary?

Additional questions:

How is "definitive closure of activities" (art 23) interpreted:

- Does it apply if all IED activities of the site are definitively stopped, but other industrial activities by the same operator may still continue?
- Does it apply if all activities on the site (IED and others industrial activities) are closing?
- Does it apply even if only one IED activity is definitely closed on the site, while the rest of the site still continues

Concerning BR assessment:

- How do you assess a BR? (is there a procedure, desktop review, field visit, second opinion..)

- What if the authority finds breaches in the BR: ask for complements?...

- How is significant level of pollution defined? (Are there fixed maximum admissible concentrations levels for certain contaminants ? Are they unique or site specific?)

- If a contamination is detected, what is the follow up by the authorities? Who has the responsibility for the follow up (owner, operator, authorities) Is there a difference made between contamination caused by the operator and a pre-existing contamination?
- How do you define “significant threat”? (based on admissible concentrations? Risk based approach?)
- Are economical aspects taken into account in the level of rehabilitation? If so, is there a guidance document that we could consult?

In the context of a permit renewal

- The BR does not give the real « baseline » state of the site when the installation is already in place, and a contamination caused by the operator might already be present: What kind of action do you take if there is an unacceptable level of contamination is detected during BR:?

For every stage:

- Are there other questions/topics that should be presented in a future guidance book ?
- Do you have best practices experiences that you would like to share with us?
- Do you feel the need for more guidance and on what topics?

Monitoring

- How do you implement the monitoring?
- What is the percentage and total number of IPPC sites with groundwater monitoring wells in operation in your country/region?
- What do you do with the results if an elevation of contamination is detected?