

EUROFORGE Position on the

"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) and Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste" (22-06-07).

The European forging industry („smitheries“) is a global pioneer in innovation, work safety, environmental protection, energy efficiency and decarbonisation and an important economic factor in Europe. Our technology is a driving force and key technology for the transformation of the user industries vehicle construction, railway technology, shipbuilding, mechanical engineering, agriculture, (wind) energy, medical and defence to climate neutrality by 2045. The predominantly SME-sized companies thus secure our strategic autonomy against global competition from China, India, the USA and other regions.

EUROFORGE represents the interests of the European forging industry.

The above mentioned EU Commission's proposal for the revision of the IED Directive suggests the extension of Annex I, 2.3 (b) which is technically and economically unfeasible for the SME companies in our industry:

The current scope of the IED includes plants with hammer installations that apply an impact energy of more than 50 kJ and maintain thermal process heat with a capacity of more than 20 MW. In the new version, this scope is to be extended to include plants with forging hammers with of more than 20 kJ without reference to any heat output and, in addition, to plants with forging presses with a pressing force of 10 MN or more.

This extension would drastically increase the number of companies affected in Europe and above all mainly affect small and medium-sized enterprises.

In our view, the following points speak against the extension of the scope:

- Noise and vibration are not significant environmental factors for small hammers and for presses.
- The inclusion of further plants does not lead to any relevant reductions in air pollutants
- Only a fraction of the plants emit air pollutants at all
- The expansion of the scope slows down the transformation process and overburdens the authorities
- Small and medium-sized enterprises cannot fulfill the IED requirements

In the case of the proposed expansion, there is a high risk of business closures or relocation to non-European locations. This is to be expected especially in the case of new investments. This would be accompanied by a shift of environmental emissions to other countries, analogous to carbon leakage, and would not relieve the environment as a whole but weaken the economic power of the European economies.

We therefore call for a waiver of the proposed extension of the scope of the IED Annex I, 2.3 (b). In any case should only a combination of the energy / power of the transformation units and the fossil heat output used in operation be used as it is in the current scope.

Detailed justifications for our position can be found in the attached appendix. We are at your disposal for further explanations at any time.