

3rd Advisory Group for UK BAT Meeting, Microsoft Teams

6 March 2025

Notes

Present:	Defra (Chair), UK BAT (Notes), Chemical Industry Association (CIA), CIWM, Department of Agriculture, Environment and Rural Affairs in Northern Ireland (DAERA NI), Environment Agency, Fuels Industry UK, Galvanizers Association, Mineral Products, Normec, Scottish Government, The Association for Renewable Energy and Clean Technology (R-E-A), UK BAT, University College London (UCL), University of Birmingham, Welsh Government, Wood Recyclers' Association (WRA)
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Apologies:	R-E-A, SEPA, SLR, UCL, Zinc Information Centre
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Agenda:	<p>1.0 Introduction to the UK BAT system, the Standards Council and UK BAT Team</p> <p>2.0 Progress with Tranche 1</p> <p>3.0 Progress with Tranche 2 Foundries (FDRY), Ceramics (CER), Slaughterhouses and Animal Byproducts (SA), Surface Treatment of Metals and Plastics (STM), Large Volume Inorganic Chemicals (LVIC)</p> <p>4.0 Membership of a Technical Working Group (TWG) – an industrial perspective (presentation)</p> <p>5.0 Tranche 3 – Defra</p> <p>6.0 Regulatory Reform Future Developments – Defra</p> <p>7.0 Panel Questions – All</p>
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1.0 Introduction to the UK BAT system, the Standards Council and UK BAT Team – Jon Robinson Defra (Chair)

The chair welcomed everyone to the meeting. The group were invited to ask questions at the end of the meeting and continue conversations after the meeting where necessary.

A brief introduction to UK BAT was given, and the meeting agenda explained.

The meetings main aim was to facilitate broader discussions with various stakeholders regarding the UK BAT system. These discussions will help inform a range of decisions, both operationally concerning the system's functionality and in terms of advice that Defra can provide to ministers for making broader decisions.

It was reported that the UK government has committed to consulting on reforms to industrial permitting in the Clean Power Action Plan for 2030.

2.0 Progress with Tranche 1 –UK BAT / Defra

Textiles (TXT), Waste Gas Treatment in the Chemical Sector (WGC), Ferrous Metals Processing Forming (FMPF), Ferrous Metals Processing Galvanizing (FMPG)

The organisation and governance of UK BAT were outlined and the differences between Tranches 1 and 2 were explained. It was confirmed that the Standards Council will facilitate the Statutory Instrument (SI) process, and the SI will define the Best Available Techniques (BAT) for each of the industrial sectors under review. The UK BAT process allows the identification of new and efficient techniques.

It was explained that Technical Working Groups (TWGs) bring together experts from the sector, including industry and those that regulate installations. The importance of obtaining a broad perspective of the different activities surrounding the industries under review was highlighted. Academics, equipment suppliers and NGO's are encouraged to join the TWGs.

The UK BAT Tranche 1 BAT Consultation (BATC) draft documents will be available to the public and will be uploaded to gov.uk prior to the formal

Consultation. The SI process is currently being prepared by Defra. All four Tranche 1 UK BAT reviews will go through the Consultation stage at the same time. It was confirmed there will be a 12-week opportunity for the public to provide comments.

A question was raised on the UK Waste Wood Sector and whether it is covered in Tranche 1 or 2. It was suggested the installation is covered by an Existing BAT Conclusion that was published before transition from the EU. The legal standing of EU BAT Conclusions was explained.

Defra explained that Standards are set for small and medium sized industries outside of the UK BAT system. The standards are similar to UK BAT, but not the same.

At the end of the BATC review, four individual Statutory Instruments (SI) will be created, one for each Tranche 1 sector. The SI's will apply to new installations within the UK immediately. For existing installations, there will be a four-year implementation window. It was acknowledged there is a difference in timeframe between the UK and EU, but anticipated this would get smaller in the future. A summary of the implementation steps was given.

A summary was given of the main outcomes from Tranche 1. It was explained that Tranche 1 reviews include generally tighter Emission Limit Values, in the BATC for the four large industrial sectors. These will be reflected in the associated permits. A broader range of parameters have also been captured because of the reviews. One benefit from the UK BAT review process was having the opportunity to talk directly to industry and regulators at the same time. This enabled questions to be raised and answered or recorded for future discussions.

Learning from tranche 1 was outlined. It was acknowledged that this is the first time a UK BAT review has taken place. In person meetings were an essential part of the process, as they allowed for detailed, clear and concise discussions on the issues presented.

International benchmarking will be important for Tranche 2, where evidence may be limited.

2.1 Ongoing development work

Development work stemming from Tranche 1 will include:

- Targeted workshops on cross sector /cross cutting issues including noise, odour, and abatement techniques. The workshops will help determine what are currently the best techniques.
- Working with European colleagues and the OECD.
- Evidence collection to include abatement costings etc.
- Advanced stakeholder engagement.
- Approaches to Circular Economy, Climate Change Adaptation and Climate Change Mitigation.
- Understanding implications of IED2.

No further comments received.

3.0 Progress with Tranche 2 - UK BAT

Foundries (FDRY), Ceramics (CER), Slaughterhouses and Animal Byproducts (SA), Surface Treatment of Metals and Plastics (STM), Large Volume Inorganic Chemicals (LVIC)

A progress update was given for the Tranche 2 sectors. It was explained the UK BAT process has 12 stages. Kick-off meetings with Technical Working Groups (TWGs) have been held for FDRY, CER, SA and STM. These sectors are currently at stage 3.

LVIC was at an earlier stage in the process. It was anticipated the LVIC Kick-off meeting would be held in the summer, following a pre-engagement period.

The UK BAT Team was initiating the next step in the process - evidence collection, for the sectors that have completed a Kick-off meeting. Once this work has been completed, draft BATC documents will be created, based on the information collected. Additional evidence could then be collected if needed, before final drafting of the BATC. This document would be discussed and signed off by the TWG before it is passed to the Standards Council. The documents would then undergo public consultation and ministerial approval, before ultimate publication as a Statutory Instrument.

The work completed by the UK BAT team since the Tranche 2 commission in 2024, was summarised. Engagement included site visits, press releases, industrial questionnaires and a public survey on Citizen Space.

Findings from the first 4 Kick-off meetings were explained, and the importance of international benchmarking was highlighted.

No further comments were received.

4.0 Membership of a Technical Working Group (TWG) - an industrial perspective (presentation) – Galvanizers Association.

The Galvanizers Association have been involved in both Tranche 1 and Tranche 2, as they represent the hot dip galvanizing industry in the UK and Ireland. An introduction was given to the Galvanizing Association, and the hot dip process. The Galvanizers Association explained their involvement in the UK BAT process to date. A key element has been to coordinate industry input into the development of UK BATC.

The Galvanizers Association were involved in the 2016 EU Ferrous Metals Processing Forming (FMPF) BREF revision, 85 galvanizing plants contributed to the data collection, including 10 from the UK. The organisation was also involved in the Tranche 1 UK BAT Conclusions for Ferrous Metals Processing Galvanizing (FMPG). Participation included online meetings and a 3-day in person TWG meeting in March 2023. This meeting comprised an exchange of information between industry, local authorities, regulators and the UK BAT Team. Various other documents were considered, including the EU BREF and the Joint Research Centre (JRC) website.

The Galvanizers Association produced 3 position papers on behalf of industry, summarising key points. These were shared with the TWG ahead of the meetings. An additional one-day meeting was held in May 2023, on a couple of items that needed further data collection and consideration. The Galvanizers Association also helped submit data for the Regulatory Impact Assessment (RIA), which looks at the cost to industry.

A supplementary information and interpretation guidance document was produced, giving a summary of the process and information on the discussions held by the TWG.

Involvement in Tranche 1 also included providing feedback on the UK BAT Information System (UK BATIS), IT system. UK BATIS has been redeveloped and designed in readiness for Tranche 2 delivery.



The Galvanizers Association are members of the Tranche 2, STM TWG, as the review will affect several members within their organisation. The importance of data and evidence collection was highlighted. Thanks were given to the Galvanizers Association for their presentation.

5.0 Tranche 3 – Defra

Defra reported that they were currently unable to give clear details on Tranche 3, but appreciated industry would like as much notice as far as possible. It was highlighted that UK BAT is a standalone system, and Tranche 3 would bring the opportunity to consider potential new sectors. The group was asked for suggestions and comments.

Action: All to contact Defra with any ideas and suggestions for Tranche 3. Suggestions can be emailed to UKBAT@defra.gov.uk

6.0 Regulatory Reform Future Developments – Defra

Defra reported there is a project focusing on reforming the environmental permitting framework for industry.

The UK government's most relevant missions were highlighted. These include strong foundations, kickstarting economic growth, an NHS fit for the future (air quality is an important part of this), and making Britain a clean energy superpower.

It was reported that wider engagement has been undertaken, and members of the group are invited to contact Defra for further discussion and information. The timeline was outlined. It was anticipated a consultation would be published in June, to collect views. Implementation of the new measures would commence in Summer/Autumn 2025. Defra are also looking at IED 2.0 changes and permitting approaches in other countries.

Key themes from engagement so far were summarised. The work to date includes identification of several key areas, to develop permitting reform proposals.

Action: All to respond to the Regulatory Reform Consultation and contact Defra with any feedback, views or experience in using the current system.

Comments were made from DAERA-NI about the EU industrial reporting portal, and Northern Ireland being partially aligned with EU large combustion plants. DAERA-NI agreed to contact Defra to continue the discussion. The CIA requested further discussion with Defra on permitting. The group discussed forthcoming meetings and engagement opportunities.

7.0 Panel Questions - All

The group was asked to give any thoughts or views on the UK BAT process.

No further comments were received.

Action: UK BAT Team to upload meeting slides and notes to UK BATIS, and upload the meeting notes to .gov.uk

Action: All to contact the UK BAT Team by email UKBAT@defra.gov.uk if you would like to give a presentation at a future Advisory Group meeting.

Actions:	
Action: All to contact Defra with any ideas and suggestions for Tranche 3. Suggestions can be emailed to UKBAT@defra.gov.uk	
Action: All to respond to the Consultation, and contact Freddie/Defra with any feedback /views experience of the system.	
Action: UK BAT Team to upload meeting slides and notes to UK BATIS, and upload the meeting notes to .gov.uk	
Action: All to contact the UK BAT Team by email UKBAT@defra.gov.uk if you would like to give a presentation at a future Advisory Group meeting.	

Acronyms	
AG	Advisory Group
BAT AEL	BAT Associated Emission Levels
BATC	UK Best Available Techniques Conclusions
CCA	Climate Change Adaptation

CCM	Climate Change Mitigation
CE	Circular Economy
CER	Ceramics
FDRY	Foundries
LVIC	Large Volume Inorganic Chemicals
NGO	Non-Governmental Organisation
SA	Slaughterhouses and Animal Byproducts
SF	Smitheries and Foundries
SI	Statutory Instrument
STM	Surface Treatment of Metals (and Plastics)
T1	Tranche One
T2	Tranche Two
TA	Technical Author
TWG	Technical Working Group
UK BATIS	UK BAT Information System
WGC	Waste Gas Chemicals