



## 4th Advisory Group for UK BAT Meeting, Microsoft Teams

17 September 2025

### Notes

<b>Present:</b>	<p>Jon Robinson - Defra (Chair), UK Best Available Techniques (UK BAT) (Notes)</p> <p>Birmingham University, Cemex, Chemical Industries Association Defra, UK Government, Department of Agriculture, Environment and Rural Affairs, Northern Ireland (DAERA), Environment Agency, Fuels Industry UK, Galvanizers Association, Geo Speciality Chemicals, HDG, Mineral Products Association, PCC Airframe, Planet Mark &amp; Institute of Directors (IoD), Radius Aerospace, Rolls Royce, Scottish Government SLR Consulting, UK BAT, University College London, Welsh Government</p>
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<b>Apologies:</b>	CIWM, R-E-A, Wood Recyclers Association
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<b>Agenda:</b>	<ol style="list-style-type: none"> <li>1.0 Introduction to the UK BAT system, the Standards Council and UK BAT Team</li> <li>2.0 Regulatory Reform Developments</li> <li>3.0 Progress with Tranche 1</li> <li>4.0 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)</li> <li>5.0 Panel Questions – All</li> <li>6.0 Forward Look</li> </ol>
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## **1.0 Introduction to the UK BAT system, the Standards Council and UK BAT Team – Jon Robinson (JR) Defra (Chair)**

The chair welcomed everyone to the meeting.

The meetings main aim was to facilitate broader discussions with a wide group of stakeholders regarding the UK BAT system. The purpose of the group is to look at overall progress, look at any cross-cutting issues, or provide an opportunity for discussion of any wider issues that fall outside the remits of the UK BAT Technical Working Groups.

The meeting agenda was confirmed.

## **2.0 Regulatory Reform Developments – Alex Giles (AG)**

The aim of this session is to give an update and receive feedback on the following Defra Consultation:

[Consultation - Modernising Environmental Permitting for Industry.](#)

An overview and background to the Consultation was given. It was confirmed the Consultation will run from 26 August to 21 October 2025. Defra welcomed responses from a wide range of stakeholders, and several meetings with stakeholder groups had been organised. The aim of the Consultation is to establish the overall direction for this reform initiative. It covers a wide range of areas – over 30 policies. It was anticipated the Consultation to would lead to further review, more detailed policy development and highlight where legislative changes are required. It was highlighted that there will be ample opportunity for further dialogue once the Consultation period has ended. The government will publish a formal response after the Consultation concludes.

### **Background**

It was explained that the existing regulatory framework was reviewed against the government's missions and Defra targets. Potential areas requiring improvement were identified based on the industrial change needed, to respond to Net Zero and other changes happening to industry within the UK.

A package of reforms was developed from the initial review, which included discussion with industry, regulators and other stakeholders. The reforms will be designed to support the growth agenda, improve environmental protection and include a risk-based approach to pollution prevention.

Defra will also continue to collaborate closely with the Devolved Governments as the policy options are further developed. Findings from the Consultation will be shared with all Devolved Governments. The main chapters of the Consultation were shared with the group. A summary of discussion and comments is given in each section below.

### **Chapter One – Enabling innovation and encouraging new technologies and techniques.**

The focus of this chapter is to look at where growth can be stimulated and how to enable innovative practices. The group was asked what are the key factors that should be considered for these innovation and growth proposals.

It was explained Chapter 2 focuses on the adoption of BAT Conclusions. Defra proposed they would like to continue with the collaborative evidence-based approach. However, it was proposed they are adopted in a concise way with clear timelines, to enable industry to plan. It was reported the purpose of this section is to explore what a different process for adoption would look like, and the safeguards within the process. It was confirmed the adoption process currently runs through Ministers in Parliament and results in the publication of Statutory Instruments. This gives very strong safeguards but questions the level of realistic scrutiny. It was confirmed the Statutory Instrument will essentially be a 1-page document. Defra explained the actual development of BAT is working well, but the adoption is not working as smoothly in practice.

The Chemical Industries Association commented that they can see the benefits of speeding up the process, by not having Ministers and Parliament involved, as it would give more certainty for business. However, comments were made that there would need to be safeguards in place.

### **Chapter 2: Agile standards – rapid, predictable and integrated standard setting.**

#### **Horizontal BAT**

It was explained that this section looks at other standards. Essentially Cross Cutting BAT where elements (for example decarbonisation) might apply to multiple industry sectors. This would enable the permitting system to look at a wider range of environmental benefits to be viewed holistically.

The group were asked for views on Horizontal BAT, and if there are any opportunities and risks. The following comments were made:

It was suggested that applying Horizontal BAT across all sectors is a logical approach, which is why these aspects were not included in WGC Tranche 1. Careful consideration would be needed to not duplicate requirements, including hazardous chemicals lists. It was suggested a scope could be developed to review what's included/not included, and the benefits and drawbacks for each horizontal proposal. Comments were also made on the Part A/B elements of the permit.

**Action: Defra** to contact the Chemical Industries Association to discuss horizontal BAT further.

### **Integrated Pollution Control (IPC) and BAT for all industry – covering Part B installations, small waste incineration plant, solvent emission activities, and medium combustion plant and specified generators.**

This section includes pollutants of emerging concern (for example PFAS and other chemicals). The section also explores the potential adoption of integrated pollution control for all industry and how it could be integrated within BAT cycles.

The group was asked for comments, priorities, risks and areas of opportunity. The following comments were made:

One set of standards would be good, and potentially easier to maintain. It would help installations with lower risk activities establish which parts are applicable to them.

It was explained that the aim of this proposal is to explore and ensure related industries are updated at similar times, and in ways that are appropriate to the scale of the operation.

### **Chapter 3 – Proportionate regulations and coherence in the framework.**

It was reported one of the key areas is looking at sectors that will become part of the industrial landscape on the route to Net Zero. Batteries and non-waste anaerobic digestion were given as examples of areas not currently under regulation.

The group was asked how Defra could be kept informed about the growth of these sectors, the key environmental risks involved, and how industry and other stakeholders could support this effort.

**Action: Defra** to contact Energy UK, Renewables UK and other Trade Associations involved with the development of electricity generation and storage.

Comments were made that the proposal for flexible tiers of regulation/a risk-based approach was welcomed. Comments were also made on the split between Environment Agency and Local Authority regulation.

The group was asked which areas will make the biggest difference in practice, in terms of the growth agenda. To enable innovation improvements to environmental protection, and which areas should be given priority.

A discussion took place on the challenge to identify what technologies will be relevant in 10 years' time (and how to regulate them), as technology is changing rapidly. Batteries and hydrogen noted as examples. It was envisaged emerging technologies guidance would be critical in the path to meet sustainability goals within the UK.

**Action: All** to contact Defra with any specific examples of emerging techniques that are in the early stages of testing – for example carbon capture.

**All** to contact Defra for more information or to request a stakeholder meeting about the Regulatory Reform Consultation.

### **3.0 Progress with Tranche 1 – JR**

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

The draft Tranche 1 BATC are available here for reference: [UK BAT - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614422/UK_BAT_-_GOV.UK.pdf)

Officials acknowledged and apologised that the timeline for adopting BAT conclusions for Tranche 1 has been slower than anticipated, because of the difficulties of agreeing highly technical documents through central government processes.

### **4.0 Progress with Tranche 2 - Paul Stevens (UK BAT)**

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

A brief introduction to the UK BAT structure and process was given. Work has progressed with the 5 Tranche 2 sectors, but the sectors are now at different stages in the process. Essentially FDRY and CER are leading the process, followed by STM, and lastly SA and LVIC.

It was explained that the public Consultation stage will allow people to comment on the BATC, BAT-AELs and supporting documents. Questions were raised on the measuring of very low levels of chemicals.

### **Kick-off meetings - lessons learned.**

Preparation of the Kick-off Meeting Paper involves:

- reviewing sources of information across the world
- site visits – to determine the difference processes within each sector
- the circulation of a First Positions Industrial Questionnaire (FPIQ).

The FPIQ is sent to many installations involved in the sector. Questions include; what are the key environmental issues for the sector, what processes do you operate and what techniques do you use. A separate less technical Citizen Space survey allows members of the public to provide comments.

Kick-off meetings have been held for FDRY, CER, SA and STM. This was the first time these had been held in the UK.

Key learning from Tranche 2, has highlighted the importance of preparatory work. The State of the Sector Report needs understanding on existing permits, and the scale of emissions associated with the installations and permits. Early discussions with Academics and Trade Associations will help ensure the face-to-face Kick-off meetings are more efficient. The group noted the early meetings, surveys, and drafting of the Kick-off meeting papers are key.

It was envisaged in future, the commenting tool within UK BATIS could be enabled for the Kick-off meeting paper. This will enable the Technical Working Groups (TWG) to submit comments on the Kick-off meeting paper before the face-to-face Kick-off meeting. This will help identify which areas need more time, and areas that have common agreement. The screening process at the Kick-off meeting can then be more efficient.

The Kick-off meeting should result in a clear line of actions and timeline for evidence collection and a common feeling from the TWG on the key priorities.

## Emerging techniques

A discussion takes place at the Kick-off meetings on emerging techniques. It is envisaged some sectors will start to have new technologies and techniques including Carbon Capture and Hydrogen trials. It was explained that this could present new opportunities. The setting of BAT-AELS and Guidance for Emerging Techniques (GET) were explained. It was suggested in the future, there may be a space to allow the development of academic ideas, industrial experience combined with regulatory requirements.

Questions were raised on the timeline for the LVIC FPIQ and evidence collection, and the resources required. It was confirmed the Large Volume Inorganic Chemicals (LVIC) Kick-off meeting will be scheduled for early 2026.

The importance of early stakeholder engagement for the LVIC sector was highlighted. The early stages of the process were outlined. It was envisaged there would be multiple shorter meetings for LVIC rather than fewer longer meetings. In-person meetings will be arranged early in the process to gather information and ensure transparency around the procedures.

The evidence process, and a summary of how the Evidence Collection Tool for Tranche 2 is developed, was outlined. Experience from Regulators, Industry, Monitoring Companies and Academics, can influence the questions and resulting evidence needed. The timeline for collecting evidence is 3 months. Data validation by Regulators then takes place.

Questions were raised on the resources needed by Operators, to complete the LVIC first positions questionnaire (FPIQ). It was confirmed early engagement would take place with the sector.

Differences between UK BAT and EU processes were outlined. It was agreed it would be better to have more frequent TWG LVIC meetings, rather than wait long time for the questionnaire to be issued. An overview of the data validation stage was given.

It was highlighted that one of the challenges so far, has been how to prove a negative, for example when everyone in the room says a certain KEI is not an issue. Justification and evidence are then needed to verify this. Other challenges include the incorporation of narrative answers, into an Excel spreadsheet, without making the spreadsheet too large.

An estimation of Tranche 2 timelines was shared with the group.

A question was raised on the EU LVIC D1. It was thought not all the processes covered by the European version, will be relevant within the UK. However, consideration will need to be given to new LVIC installations. The potential for benchmarking, was explained.

## 5.0 Panel Questions - All

The group were 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](mailto:UKBAT@defra.gov.uk) if you would like to give a presentation at a future Advisory Group meeting.

## 6.0 Forward Look (JR)

### Feedback and Process Development

The Chair highlighted the Advisory Group continues to play a valuable role in informing process improvements, through shared feedback. Members are encouraged to reflect on what has worked well and identify areas for further development. Appreciation was expressed for the contributions made during the meeting.

### Participation and Engagement

Attendees are asked to promote wider participation in future meetings to ensure diverse perspectives are represented.

### Next Steps

Smaller working groups may be convened to undertake more detailed work on consultation and policy development.

## 7.0 Close (JR)

### Actions:

<b>Defra</b> to contact the Chemical Industries Association to discuss horizontal BAT further.	
<b>Defra</b> to contact Energy UK, Renewables UK and other Trade Associations involved with the development of electricity generation and storage.	
<b>All</b> to contact Defra with any specific examples of emerging techniques that are in the early stages of testing – for example carbon capture.	
<b>All</b> to contact Defra for more information or to request a stakeholder meeting about the Regulatory Reform Consultation.	
<b>UK BAT Team</b> to upload meeting slides and notes to UK BATIS, and upload the meeting notes to gov.uk	
<b>All</b> 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.	

<b>Acronyms</b>	
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