

## EU Industrial Emissions Directive

### BACKGROUND

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UEPG, the European Aggregates Association represents the largest non-energy extractive industry in Europe with members in 23 countries. Aggregates are sand, gravel, crushed rock, marine aggregates as well as secondary raw materials, such as recycled and manufactured aggregates. They are used to build Europe's essential infrastructure including homes, roads, railways, schools, hospitals or dams. The European Aggregates Industry covers an annual demand of more than 3 billion tonnes of aggregates, produced on 26.000 sites, by 15.000 companies, employing 200.000 people across Europe.

UEPG is fully committed to sustainable development with a track record, recognised by the European Commission and NGOs, of actions preserving biodiversity and the environment in general.

In that respect, UEPG would like to present a few characteristics of the aggregates industry in relation to the Industrial Emissions Directive. **The potential inclusion of the aggregates industry (representing the largest non-energy extractive industry) would not only be irrelevant to the purpose of the IED, it would also create cumbersome and costly procedures for permitting of an industry extracting and processing inert materials.**

### KEY MESSAGES

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- **Non-polluting industry:** the sector is dealing mostly with inert materials and the operations in the aggregates industry are purely mechanical, without any concentration process. The extraction and processing of aggregates does not require any energy-intensive process, no thermal energy is used which results in no significant impact on the levels of pollution for air, soil or water. The NO<sub>x</sub> and SO<sub>x</sub> emissions compared to other industries is practically null.

In a pledge to become even greener, the Aggregates Industry in [Sweden](#) has committed to become fossil free by 2045.

- **Inert extractive wastes internal management and circularity:** The stripping ratio is on average <0.1:1. According to the Mining Waste Directive, most of this very low rate of non-used materials are included under the inert wastes definition and used at 100% for rehabilitation purposes in accordance with article 10 (excavation voids) and managed within a waste management plan.

Aggregates sites are in the front line of implementing the Circular Economy Action Plan by minimising the generation of any kind of wastes and the consumption of water, and applying recycling techniques to waste water.

- **A local industry of small and medium enterprises:** the vast majority of aggregates producers are SMEs with an average of 13.3 employees per company. It is a local industry with an average transport distance on road of 30-50 km.
  
- **Diversity in extraction, production and installations:** there is little comparability in terms of extraction and production of aggregates since these vary depending on a series of factors: geology, >50 different types of rock, size, extraction process, treatment, technologies or the use of the final product, which may sometimes be a mixture with recycled demolition waste. Therefore, comparing installations for the use of BATs in an industry that is intrinsically diverse could negatively impact even the implementation of circularity.

According to the JRC, aggregates represent 86.3% of the 30.144 European non-energy extraction sites. Other subsectors have significantly higher emission levels. Based on the precautionary and proportionality principles it would be inadequate to include the entire non-energy extractive industry in the scope of this directive.

- **High level of environmental protection for water:** in the EU, each extraction site permitting procedure includes a hydrological study, an environmental impact assessment and is required to develop a water management plan. Moreover, independent studies demonstrate that gravel extraction lakes often have water of higher ecological quality compared to surrounding water bodies, contribute to the improvement of the water ecosystems and even to the supply for human consumption.