



NATIONAL CENTER FOR
ENVIRONMENTAL INNOVATION

Integrated Permitting: An International Collaboration Effort

What is Integrated Permitting?

A growing number of other countries are using "integrated" permits, which control all elements of a facility's environmental "footprint." Emissions to air, water, and land are comprehensively managed, along with a host of other factors (such as waste generation, raw materials use, energy efficiency, noise, accident prevention, other pollution prevention factors, and risk management). Accounting for the whole facility's environmental impacts, an integrated permit goes beyond simply consolidating applicable media permits – it is intended to promote continually improving performance while ultimately driving the facility to more sustainable outcomes.

The Integrated Permitting International Collaboration Effort

This international comparison presents an opportunity for the US to assess whether integrated permitting may offer one way to achieve better environmental results, reduce regulatory burdens, or both. The United Kingdom (UK) and European Union (EU), contemporary leaders in integrated permitting, have offered to collaborate with the EPA by sharing their experience in transitioning to an integrated permitting system and by helping EPA explore the potential for using such models in the US.

Taking advantage of this international invitation, EPA hopes to first assess what aspects of the European approach might be translatable to the US, building useful comparison models and assessment tools regarding: (1) integrated permitting applications, operational and organizational approaches, and strategies; (2) areas of commonality between the European and US permitting practices; (3) the US States' experimental permitting experience, to date; and (4) benefits and costs of integrated permitting. Lastly, EPA hopes to work with interested States and industry partners to explore the potential use of integrated approaches in the US.

UK and EU Experience

The UK has been using integrated permitting since 1990, starting with the Integrated Pollution Control (IPC) Act. The IPC required operators (for specified industries having the greatest potential discharges in one or more media) to evaluate the potential impact of their processes and select the most practical options for minimizing pollution overall. In 1996, building on the UK experience, the EU adopted the Integrated Pollution Prevention and Control (IPPC) directive, establishing basic rules for incorporating integrated permitting systems into the regulatory frameworks.

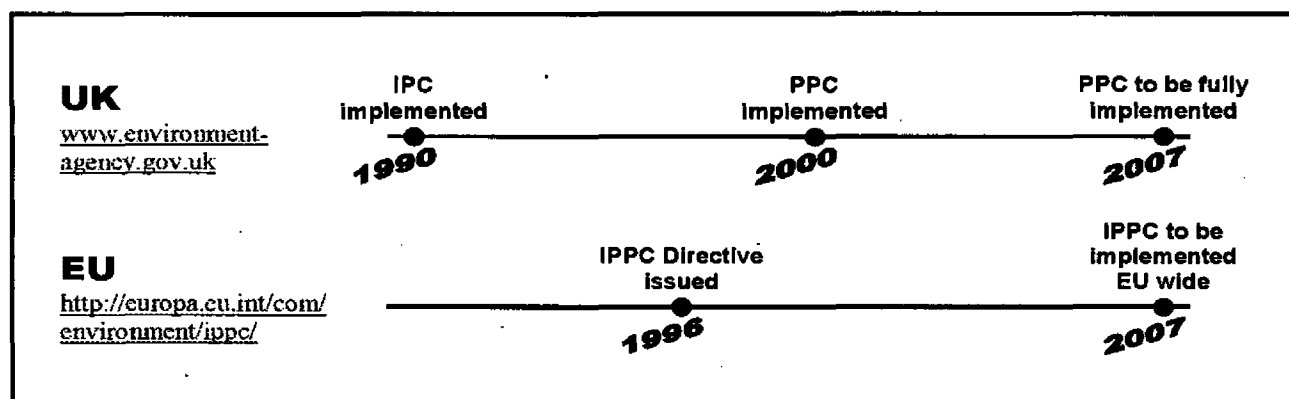
The EU member states are currently implementing integrated permitting systems in compliance with the IPPC. The directive demands that regulators set levels for permit conditions to achieve protection for the environment as a whole and calls for facilities to comprehensively account for all environmental impacts. The

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IPPC addresses 32 specific business sectors, including energy, metals, minerals, chemicals, waste management, pulp and paper, food and drink, intensive agriculture, tanning, textiles, glass, and ceramics.

Under the IPPC, permit conditions must be based on the concept of Best Available Techniques (BAT). The IPPC Bureau, based in Seville, Spain, organizes an exchange of information among experts from EU member states, industry, and environmental non-government organizations to produce BAT reference documents (BREFs) for each of the 32 sectors. Regulators must also take into account the technical characteristics of a facility, its geographic location, and local environmental conditions when writing a permit.

In 2000, the UK began to phase in the requirements of the IPPC directive. The UK's new regime, Pollution Prevention and Control (PPC), replaces the IPC and should be fully implemented by 2007. The PPC is outcome-focused, expands permitting considerations (adding, for example, energy use and site restoration), and includes additional sectors (such as, waste management, paper, food, and intensive agriculture). The UK also uses a risk-screening methodology based on the complexity, emissions, location, and performance of a facility to target activities that present the greatest risk to the environment. The UK issued its first PPC permit in March 2001 and has issued approximately 700 integrated permits to date. An approximate 600 additional applications are currently being processed.



Participation in the Effort

A network of international, federal, and state regulators is being formed to undertake this exploratory effort. The team will include innovative permit-writers and policy and program experts from EPA's Regional and National Program Offices, the Office of International Affairs, the National Center for Environmental Innovation, and interested State agencies and industry. For further information in general or regarding participation in this collaborative effort, please contact Lisa Comer in EPA's National Center for Environmental Innovation at 202-566-2206 or at comer.lisa@epa.gov.