



Miljøministeriet

Aktoversigt

Sagstitel: Ny afgørelse fra Miljø- og Fødevareklagenævnet om udledning af miljøfarlige forurenende stoffer

Sagsnummer: 2023 - 2821

Akt nr.	Dato	Titel	Akt ID	#	Parter	Kommentar
23	12-04-2023 14:57:27	Notat til STM om suspension af vejledninger om udledning af miljøfarlige forurenende stoffer	394271	3		
22	12-04-2023 14:52:39	Opdateret notat og talepinde - konsekvenser af ny afgørelse fra Miljø- og Fødevareklagenævnet	394265	4		
12	17-03-2023 10:43:23	SV: Spørgsmål til notat om forringelse	387015	2		
7	20-03-2023 10:19:47	ANNULLERET: Opdateret notat og talepinde - konsekvenser af ny afgørelse fra Miljø- og Fødevareklagenævnet	384480	4		
6	17-03-2023 15:06:45	ANNULLERET: Notat til STM om suspension af vejledninger om udledning af miljøfarlige forurenende stoffer	384057	3		
5	16-03-2023 14:24:08	Talepinde - konsekvenser af nye afgørelse fra Miljø - og Fødevareklagenævnet	382746	3		

= antal relaterede dokumenter.

Den 13. marts 2024



Aktdetaljer

Akttitel: Notat til STM om suspension af vejledninger om udledning af miljøfarlige forurenende stoffer

Aktnummer: 23

Akt ID: 394271

Dato: 12-04-2023 14:57:27

Type: Intern

Dokumenter: [1] Bilag 2 - Notat - NOVO - mulige konsekvenser af nævnsafgørelse NY.docx
[2] Cover minister STM.docx (MEDTAGES IKKE)
[3] Bilag 1 - Notat til STM om ny afgørelse fra Miljø- og Fødevareklagenævnet.docx (MEDTAGES IKKE)

Den 13. marts 2024



Oversigt over, hvilke konsekvenser Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenede stoffer forventes at få for Novo Nordisk

Baggrund

Novo Nordisk A/S består af følgende virksomheder:

- Novo Nordisk Kalundborg
- Novo Nordisk Pharmatech
- Novo Nordisk Bagsværd
- Novo Nordisk Hillerød
- Novo Nordisk Brogårdsvej
- Novo Nordisk Hagedornsvej

Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenende stoffer vil få betydning for en lang række virksomheder. Miljøstyrelsen har lavet en oversigt over, hvilken betydning denne afgørelse forventes at ville få for igangværende ansøgninger om miljøgodkendelse inden for Novo Nordisk koncernen (se også bilag 1).

Novo Nordisk Kalundborg og Novo Nordisk Pharmatech har igangværende ansøgninger om miljøgodkendelser og revurderinger af miljøgodkendelser, som umiddelbart ikke vil kunne gives pga. klagenævnsafgørelsen.

NOVO sites som påvirkes af klagenævnsafgørelsen

Novo Nordisk Kalundborg:

Miljøstyrelsen har modtaget en foreløbig ansøgning om miljøgodkendelse til et stort projekt til udvidelse med blandt andet en ny gæringsfabrik, grovrensningsfabrik, finrensningsfabrik samt en frysetørrebygning. Det foreløbige ansøgningsmateriale mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af klagenævnsafgørelsen.

Novo Nordisk planlægger en udvidelse, som over en årrække vil indebære en fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Renseanlægget er derfor netop nu ved at udarbejde en opdateret miljøvurdering, og søger om forøget udledning til Jammerland Bugt. Denne ansøgning vil blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om en nødstrømsgenerator. Miljøstyrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget be-

grænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger (beregninger af nedfald fra luft) til projektet, som dermed ikke bliver påvirket af klagenævnsafgørelsen.

Novo Nordisk Pharmatech:

Miljøstyrelsen er i gang med at udarbejde revurdering af miljøgodkendelse¹. I den forbindelse har Miljøstyrelsen stillet krav om, at drænvand fra en grøft, som virksomheden indtil nu har ledt direkte ud til Køge bugt, skal godkendes, således den opfylder miljøkvalitetskravene. Det vil ikke være muligt at give denne godkendelse pga. klagenævnsafgørelsen, men virksomhedens nuværende udledning vil kunne fortsætte, indtil der generelt findes en løsning. Tilsvarende for revurderingen.

Virksomheden har fremsendt ansøgning om miljøgodkendelse af en facilitet med flere funktioner (multipurpose facilitet), som skal benyttes til fremstilling af affinitetsresiner (et materiale som kan binde stoffer). Der er tale om et mindre projekt. I forbindelse med behandlingen af ansøgningen om miljøgodkendelse, vil der være behov for at lave depositionsregning (beregning af nedfald fra luften). På baggrund af klagenævnsafgørelsen vil det ikke være muligt at meddele miljøgodkendelse af projektet.

NOVO sites som ikke påvirkes af klagenævnsafgørelsen

Novo Nordisk Hillerød:

Miljøstyrelsen har modtaget en ansøgning om udvidelse af en bygning med en ny produktionsfacilitet til fremstilling af aktivstoffer til blødermedicin. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinjer. Der er tale om et større projekt. Der vil i forbindelse med dette projekt ikke blive udledt stoffer, der kræver en depositionsregning. Projektet vil derfor ikke blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om etablering af en nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger til projektet, og det vil ikke blive påvirket af klagenævnsafgørelsen.

Novo Nordisk Bagsværd:

Den igangværende større ansøgning, som blandt andet indeholder en udvidelse af gæringskapaciteten og etablering af en helt ny grovrensingsfabrik, vil ikke blive påvirket af klagenævnsafgørelsen, da der ikke vil være emission af stoffer, der kræver en depositionsregning.

Novo Nordisk Brogårdsvej:

- ¹ Revurdering på baggrund af CWW BREF, dvs BAT-referencedokument for [Spildevands- og luftrensning og dertil hørende styringssystemer i den kemiske industri](#) (CWW, Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector)

Der er ikke nogle igangværende projekter.

Novo Nordisk Hagedorns vej:

Der er ikke nogle igangværende projekter.

Øvrigt:

Der er 3 af NOVOs virksomheder, der har søgt og modtaget en godkendelse til brændselsomlægning fra naturgas til olie. Disse miljøgodkendelser er meddelt, inden afgørelsen fra Miljø- og Fødevareklagenævnet har meddelt deres afgørelse.

Bilag 1

Igangværende sager på alle Novo Nordisk fabrikkerne, som kan blive påvirket af midlertidig stop for afgørelser af sager med spildevand og deposition

Opgaver markerede med rødt, er igangværende opgaver som bliver påvirket af det midlertidige stop.

Novo Nordisk Kalundborg	<p>Der er fremsendt en foreløbig ansøgning om en ny gæringsfabrik, grovrensfabrik, finrensfabrik og en frysetørrebygning. Der mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af afgørelsen.</p> <p>En fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Den øgede mængde spildevand medfører en forøget udledning til Jammerland Bugt og vil blive påvirket af klage-nævnsafgørelsen</p> <p>Igangværende godkendelsessag om 2 Brown-out anlæg (nødgeneratorer). Miljøstyrelsen har vurderet, at når anvendelsen kun omfatter nødstrøm, så skal der ikke udarbejdes depositions-beregninger for projektet pga. ubetydelig påvirkning, op til 12 timer årligt</p>
Novo Nordisk Pharmatech	<p>Virksomheden pumper i dag drænvand væk fra en grøft. Indtil nu har de ledt det ud uden en tilladelse, men i forbindelse med CWW revurderingen, har styrelsen stillet krav om, at der skal gives en godkendelse til denne udledning, således den opfylder miljøkvalitetskriterierne. Dette er ikke muligt med det midlertidige stop.</p> <p>Virksomheden har ansøgt om miljøgodkendelse til en Multipurpose facilitet, hvor der vil være luftafkast. Dermed vil dette projekt blive påvirket, som følge af krav om depositions-beregninger.</p>

	CWW BREF revurdering er i gang, og vil også blive påvirket af klagenævnssafgørelsen.
Novo Nordisk Bagsværd	Den aktuelle ansøgning om miljøgodkendelse som sagsbehandles, indeholder ikke udledning af stoffer, hvor der kræves depositionsregning.
Novo Nordisk Hillerød	<p>Der er modtaget en ansøgning om miljøgodkendelse mhp. udvidelse af bygning 25 K med en ny produktionsfacilitet 25K2 til fremstilling af API. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinier. Der er den 7. oktober 2022 givet dispensation til bygge- og anlæg. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Miljøstyrelsen har modtaget ansøgning om etablering af en Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), og der skal derfor ikke udarbejdes depositionsregninger for projektet. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Der er givet tilladelse til omskiftning mellem naturgas og olie</p>
Novo Nordisk Brogårdsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie
Novo Nordisk Hagedørnsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie



Aktdetaljer

Akttitel: Opdateret notat og talepinde - konsekvenser af ny afgørelse fra Miljø- og Fødevareklagenævnet

Aktnummer: 22

Akt ID: 394265

Dato: 12-04-2023 14:52:39

Type: Intern

Dokumenter:

- [1] Bilag 1 - Talepinde - konsekvenser af klagenævnsafgørelse.docx (MEDTAGES IKKE)
- [2] Bilag 2 - Notat - NOVO - mulige konsekvenser af nævnsafgørelse NY.docx
- [3] Bilag 3 - Teknisk gennemgang vedr. RGS og spildevand.pptx (MEDTAGES IKKE)
- [4] Cover minister.docx (MEDTAGES IKKE)

Den 13. marts 2024



Oversigt over, hvilke konsekvenser Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenede stoffer forventes at få for Novo Nordisk

Baggrund

Novo Nordisk A/S består af følgende virksomheder:

- Novo Nordisk Kalundborg
- Novo Nordisk Pharmatech
- Novo Nordisk Bagsværd
- Novo Nordisk Hillerød
- Novo Nordisk Brogårdsvej
- Novo Nordisk Hagedornsvej

Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenende stoffer vil få betydning for en lang række virksomheder. Miljøstyrelsen har lavet en oversigt over, hvilken betydning denne afgørelse forventes at ville få for igangværende ansøgninger om miljøgodkendelse inden for Novo Nordisk koncernen (se også bilag 1).

Novo Nordisk Kalundborg og Novo Nordisk Pharmatech har igangværende ansøgninger om miljøgodkendelser og revurderinger af miljøgodkendelser, som umiddelbart ikke vil kunne gives pga. klagenævnsafgørelsen.

NOVO sites som påvirkes af klagenævnsafgørelsen

Novo Nordisk Kalundborg:

Miljøstyrelsen har modtaget en foreløbig ansøgning om miljøgodkendelse til et stort projekt til udvidelse med blandt andet en ny gæringsfabrik, grovrensningsfabrik, finrensningsfabrik samt en frysetørrebygning. Det foreløbige ansøgningsmateriale mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af klagenævnsafgørelsen.

Novo Nordisk planlægger en udvidelse, som over en årrække vil indebære en fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Renseanlægget er derfor netop nu ved at udarbejde en opdateret miljøvurdering, og søger om forøget udledning til Jammerland Bugt. Denne ansøgning vil blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om en nødstrømsgenerator. Miljøstyrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget be-

grænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger (beregninger af nedfald fra luft) til projektet, som dermed ikke bliver påvirket af klagenævnsafgørelsen.

Novo Nordisk Pharmatech:

Miljøstyrelsen er i gang med at udarbejde revurdering af miljøgodkendelse¹. I den forbindelse har Miljøstyrelsen stillet krav om, at drænvand fra en grøft, som virksomheden indtil nu har ledt direkte ud til Køge bugt, skal godkendes, således den opfylder miljøkvalitetskravene. Det vil ikke være muligt at give denne godkendelse pga. klagenævnsafgørelsen, men virksomhedens nuværende udledning vil kunne fortsætte, indtil der generelt findes en løsning. Tilsvarende for revurderingen.

Virksomheden har fremsendt ansøgning om miljøgodkendelse af en facilitet med flere funktioner (multipurpose facilitet), som skal benyttes til fremstilling af affinitetsresiner (et materiale som kan binde stoffer). Der er tale om et mindre projekt. I forbindelse med behandlingen af ansøgningen om miljøgodkendelse, vil der være behov for at lave depositionsregning (beregning af nedfald fra luften). På baggrund af klagenævnsafgørelsen vil det ikke være muligt at meddele miljøgodkendelse af projektet.

NOVO sites som ikke påvirkes af klagenævnsafgørelsen

Novo Nordisk Hillerød:

Miljøstyrelsen har modtaget en ansøgning om udvidelse af en bygning med en ny produktionsfacilitet til fremstilling af aktivstoffer til blødermedicin. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinjer. Der er tale om et større projekt. Der vil i forbindelse med dette projekt ikke blive udledt stoffer, der kræver en depositionsregning. Projektet vil derfor ikke blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om etablering af en nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger til projektet, og det vil ikke blive påvirket af klagenævnsafgørelsen.

Novo Nordisk Bagsværd:

Den igangværende større ansøgning, som blandt andet indeholder en udvidelse af gæringskapaciteten og etablering af en helt ny grovrensingsfabrik, vil ikke blive påvirket af klagenævnsafgørelsen, da der ikke vil være emission af stoffer, der kræver en depositionsregning.

Novo Nordisk Brogårdsvej:

-
- ¹ Revurdering på baggrund af CWW BREF, dvs BAT-referencedokument for [Spildevands- og luftrensning og dertil hørende styringssystemer i den kemiske industri](#) (CWW, Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector)

Der er ikke nogle igangværende projekter.

Novo Nordisk Hagedorns vej:

Der er ikke nogle igangværende projekter.

Øvrigt:

Der er 3 af NOVOs virksomheder, der har søgt og modtaget en godkendelse til brændselsomlægning fra naturgas til olie. Disse miljøgodkendelser er meddelt, inden afgørelsen fra Miljø- og Fødevareklagenævnet har meddelt deres afgørelse.

Bilag 1

Igangværende sager på alle Novo Nordisk fabrikkerne, som kan blive påvirket af midlertidig stop for afgørelser af sager med spildevand og deposition

Opgaver markerede med rødt, er igangværende opgaver som bliver påvirket af det midlertidige stop.

Novo Nordisk Kalundborg	<p>Der er fremsendt en foreløbig ansøgning om en ny gæringsfabrik, grovrensfabrik, finrensfabrik og en frysetørrebygning. Der mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af afgørelsen.</p> <p>En fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Den øgede mængde spildevand medfører en forøget udledning til Jammerland Bugt og vil blive påvirket af klage-nævnsafgørelsen</p> <p>Igangværende godkendelsessag om 2 Brown-out anlæg (nødgeneratorer). Miljøstyrelsen har vurderet, at når anvendelsen kun omfatter nødstrøm, så skal der ikke udarbejdes depositions-beregninger for projektet pga. ubetydelig påvirkning, op til 12 timer årligt</p>
Novo Nordisk Pharmatech	<p>Virksomheden pumper i dag drænvand væk fra en grøft. Indtil nu har de ledt det ud uden en tilladelse, men i forbindelse med CWW revurderingen, har styrelsen stillet krav om, at der skal gives en godkendelse til denne udledning, således den opfylder miljøkvalitetskriterierne. Dette er ikke muligt med det midlertidige stop.</p> <p>Virksomheden har ansøgt om miljøgodkendelse til en Multipurpose facilitet, hvor der vil være luftafkast. Dermed vil dette projekt blive påvirket, som følge af krav om depositions-beregninger.</p>

	CWW BREF revurdering er i gang, og vil også blive påvirket af klagenævnssafgørelsen.
Novo Nordisk Bagsværd	Den aktuelle ansøgning om miljøgodkendelse som sagsbehandles, indeholder ikke udledning af stoffer, hvor der kræves depositionsregning.
Novo Nordisk Hillerød	<p>Der er modtaget en ansøgning om miljøgodkendelse mhp. udvidelse af bygning 25 K med en ny produktionsfacilitet 25K2 til fremstilling af API. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinier. Der er den 7. oktober 2022 givet dispensation til bygge- og anlæg. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Miljøstyrelsen har modtaget ansøgning om etablering af en Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), og der skal derfor ikke udarbejdes depositionsregninger for projektet. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Der er givet tilladelse til omskiftning mellem naturgas og olie</p>
Novo Nordisk Brogårdsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie
Novo Nordisk Hagedørnsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie



Aktdetaljer

Den 13. marts 2024

Akttitel: SV: Spørgsmål til notat om forringelse Aktnummer: 12

Akt ID: 387015

Dato: 17-03-2023 10:43:23

Type: Intern

Dokumenter: [1] SV Spørgsmål til notat om forringelse.eml (MEDTAGES IKKE)
[2] WFD-CIS-WG-Chem_Meeting-2019-04-04&5_MINUTES(1)-3.doc



EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Directorate C – Quality of Life
ENV.C.1 – Clean Water



14TH MEETING OF THE WFD CIS WORKING GROUP CHEMICALS

4TH – 5TH APRIL 2019

CENTRE A. BORSCHETTE (CCAB), RUE FROISSART 36, BE-1049 BRUSSELS

CHAIR: HELEN CLAYTON (HC) (DG ENV.C.1)

CONTENTS:

- [\(1\) Welcome and adoption of the agenda \[Chair\]](#)
- [\(2\) Minutes of previous meeting and matters arising \[Chair\]](#)
- [\(3\) Implementing metals EQS \[NL, FR, COM\]](#)
- [\(4\) Fitness check of WFD & FD \[COM, all\]](#)
- [\(5\) Watch list \(WL\) \[JRC\]](#)
- [\(6\) Plastics/Microplastics \[COM & JRC, all\]](#)
- [\(7\) CIS work programme \[COM, all\]](#)
- [\(8\) Strategic Approach to Pharmaceuticals in the Environment \[COM\]](#)
- [\(9\) ICPR Recommendations for Reducing Micropollutants in Waters \[ICPR\]](#)
- [\(10\) Relevant policy developments \[COM\]](#)
- [\(11\) AOB \[COM, all\]](#)
- [\(12\) Emission Permitting and non-deterioration \[COM, all\]](#)

[ANNEX-1: List of Participants](#)

[ANNEX-2: Table of follow-up actions](#)

1. WELCOME AND ADOPTION OF THE AGENDA [CHAIR]

[Document: WG Chem Draft Agenda-2019-04-04-05 final revised.pdf](#)

COM (HC) welcomed the participants. The agenda was foreseen as split into a first day to discuss steps to finalise the metals guidance, the Fitness Check of WFD & FD outcomes and next steps, the WL 3rd year of monitoring, an update on plastics/microplastics initiatives, and other points. The focus of the second day was on permitting issues, for which interventions and additional presentations were encouraged to optimise discussion on this subject. No comments were made on the agenda, it was therefore adopted as circulated.

Actions / item 1 / Agenda:

- None.

[↑](#)

2. MINUTES OF PREVIOUS MEETING AND MATTERS ARISING [CHAIR]

COM (HC) apologised for not having provided the Minutes of the previous meetings and noted that work was still ongoing to find the right format.

Actions / item 2 / Minutes of previous meetings:

- COM will circulate the minutes of the previous meetings.

[↑](#)

3. IMPLEMENTING METALS EQS [NL, FR, COM]

[Documents: WG Chem April 2019 \(3\) Drafting metals guidance - final presentation.pptx](#)

The state of this project, chaired by NL and FR, was summarised by DTH (NL). The project started in April 2017, and after two years is now in its final phase. The third draft was issued on the 18th of December 2018 and received two rounds of comments (with around 100 comments per round). A 4th meeting was held in Paris on the 31st of January 2019. The comments received are being fed into the final version. The contents also benefited from the parallel activity that aimed to compare the BLM tools (PNEC-Pro and Bio-met) and their simplified respective versions, based on data for Ni, Cu, Zn and Pb. The RCOM tables and the Chapters were ready.

COM (HC) indicated the combination into one guidance document is close to being finished and that the objective was to submit the document to the Strategy Coordination Group in May, and afterwards to the Water Directors for its adoption. EUROMETAUX thanked the Chair, FR and NL, and other contributors, notably IT. EUROMETAUX also recalled its previous request to include in the conclusions of this document that further investigation will be planned based on experience gained by applying the guidance. COM (HC) acknowledged that some issues could have been further investigated, but that it was not

possible at this point, however, background-preparatory work can continue and does not need to stop until the guidance is reviewed.

Actions / item 3 / Implementing metals EQS:

- COM will upload a first merged version of the metal's guidance on CIRCABC in May.

[↑](#)

4. FITNESS CHECK WFD & FD [COM, ALL]

Document: none.

COM (HC) provided some insights about the public consultation statistics. However, due to the time required by the IT system to transform the data no precise analytical outcomes were available at the time of the meeting and the consultancy work was still ongoing. Some interesting observations were already made. More than 300,000 comments have been uploaded, including some after the deadline. A large part was posted by NGOs, reflecting their strong interest in the WFD and in the protection of waters. About 1,900 contributors also answered the expert part of the questionnaire; among them, 70% were EU citizens and 30% organisations (notably 5% public bodies, 8% companies, 5% business associations, and 4% NGOs). Within MS, most of the comments for this expert part came from DE (52%) and FR (7.4%). 4% of the comments was from outside the EU.

COM (HC) added that a more complete picture will be published in the summer. Moreover, a further stakeholder meeting will focus on the findings of this consultation. In parallel, several topic-based assessments (e.g. economic) were also ongoing. COM (HC) pointed out that as the legal deadline being in December 2019, the support report should be available at the end of the third quarter of this year. In addition, the fine analysis (e.g. about microplastics) conducted for the Urban Waste Water Treatment Directive, which also has its legal deadline in December 2019, should also be considered in the Fitness Check. EUROFER asked about the CIRCABC folders for themes such as permits, exemption, ecological status definition and EUROMETAUX if the document of the workshop held on the 10th of October will be circulated. COM (HC) assured that the folders will be checked, and links provided.

COM (HC) showed the slide with the different topics targeted by the Fitness Check, including the definition of two different status (chemical and ecological), one-out-all-out principle, the Policy coherence (agriculture, transport, energy), and the non-deterioration obligation; and asked for comments from the members. UK explained that some of their comments didn't fit in any of the topics and so that the ability to create new questions would have been very useful. BE highlighted the same issue but indicated that the free text option was a solution that they used e.g. to comment about the cohesion between different legal texts. FI stressed that all the issues are important and that some should have been included in the questionnaire, e.g. shifting the monitoring from old fashion approaches to new ways. COM (HC) indicated that expectation in this discussion was a retrospective approach not to point out what should have been done, but how it did work; for example, if the comment of FI meant that the questionnaire was insufficient. FI answered that its comment was indeed that the questionnaire was insufficient.

EUROMETAUX and CONCAWE wished to also highlight the short delay, three weeks being insufficient to add something truly new compared to the general public consultation; For this reason, they didn't answer.

In addition, the Swedish Water Alliance wondered how quantification of the cost benefits would be conducted, the efficiency criteria being important in such an assessment, and the short time a difficulty to include experience with companies. COM (HC) acquiesce that a classical cost-benefit approach would be difficult, especially the benefit part, so making the data not balanced; COM (HC) indicated that any additional work at the company level would be useful and therefore welcomed.

PAN-Europe manifested its expectation that special attention would be paid on the extra information in free text and so interested in understanding how feedback can adjust legislation. COM (HC) indicated that a good feedback was firstly expected through the monitoring, but that other types of feedback, as the one mentioned here, were also important to complete the understanding. CH pointed out that, in Switzerland beside the annual average monitoring data all 10 months, they were also adding specific investigations. PAN-Europe also considered that once a year in all sites was rather a limited view, and notably that more biocides and pesticides should be monitored in particular when used in opened areas. BE also investigated beside the routine monitoring specific concerns, e.g. neonicotinoids in coastal and marine areas, by using as a signal a PNEC threshold adjusted with an additional protection factor. COM (HC) noted this as of interest for the WL discussions and so encouraged inputs. BE indicated that nothing jumped out from this investigation.

Actions / item 4 / Fitness Check:

- When the detailed analysis is ready, probably in May, COM will share it.

↑

5. WATCH LIST (WL) [JRC]

[Document: WG Chem April 2019 \(5\) WL_3rd year_TL.pdf](#)

JRC (TL) explained that, from 2008 to the 31st of January 2019, 50695 samples were collected by EEA within the WL programme and that the JRC WL 3rd reporting was based on these data, and some data from NL and ES collected previously. JRC (TL) indicated that the data submission delay will be postponed until the 30th of March, and that data submitted afterwards will be processed within the 4th WL reporting period. The objective of this reporting is to help the harmonisation of the data monitoring by the MSs.

BE indicated that some data contents, e.g. local pressure information associated with the monitoring data, will have to be confirmed for the years 2015/2016/2017. JRC (TL) acquiesced that although most of the MS monitored all substances of the 1st and 2nd WL, a drop-down was observed with the 3rd WL due to the possibility to exclude some substances of the programme and adapt the monitoring to the new pressures at monitoring sites and to the LOQs. NL, PL and LU also highlighted some problems reporting new substances. EEA indicated that the reporting system setup was not ready but will be during 2019, probably December according to COM (HC). EEA also indicated that next time (in 2020) the system setup will be ready earlier to avoid this delay.

DE raised the need to monitor seasonally rather than annually and wondered how the data could be interpreted based on only a yearly frequency. JRC (TL) indicated that the objective was to combine these data in a harmonised picture, and that special care was put on the representativeness. COM (HC) added that the 1-year timeframe was according to the Directive and that the representativeness of all the MS was the important first objective for the WL. JRC (TL) called for submission of proxy-area information (downstream WTP, agricultural activities, etc.), which are needed to interpret the monitoring data. LU asked if examples of the reporting of the level of detail could be provided. EEA indicated that it could be possible to show to the MS how to access reports of other MSs.

COM (HC) concluded by thanking the MS for their continuous reporting.

Actions / item 5 / Ground Water Watch List:

- After some updates by JRC related to the comments of the members, COM to launch the presentation on CIRCABC.

↑

6. PLASTICS/MICROPLASTICS [COM & JRC, ALL]

[Document: WG Chem April 2019 \(6\) JRC_Plastics_Project_v4__TL_final.pdf](#)

COM (HC) announced that an R&D scientific review will be published soon, and that other developments were also ongoing under the JRC project on “sustainability and impacts of plastics”. JRC presented this multidisciplinary project that covers marine litter and its life cycle assessment, microplastics, and plastics recycling. A stakeholder consultation was organised in November 2018 and contributed to this work, which should result in more reliable methods, e.g. for detecting and quantifying microplastics, including its bioaccumulation and biomagnification in the food chains.

UK asked if microfibrils were included in the microplastics. COM indicated that this was the case in the ECHA restriction assessment. In addition, in the JRC presentation it was specified that the objective was to fill the gaps as detection/identification/enumeration for free or internalised plastic/microplastic particles.

LU noted that there is already knowledge on how to measure, and that expectation is about how to solve the problem, e.g. waste improvements. JRC indicated that this final aim was part of the work, for example, in the wastewater stakeholders meeting, there were talks about the removal efficiency of textile fibres in wash machines. UK noted that numerous working outcomes could be shared with the WG-Chemicals. NL and DE supported this suggestion and added that working together would be great. COM (HC) acknowledged that this information was not yet circulated but assured it will be shared.

BE underlined that macroplastics are of major concern because they can directly kill marine life, are the source of microplastics, and are a target for management measures. COM (HC) confirmed that COM is aware, but that further assessment is needed for decisions.

RO asked if sediment matrix was also in the scope of this project. JRC (TL) answered that water, sediment and biota matrices were foreseen in this investigation.

Actions / item 6 / Plastics/Microplastics:

- COM will circulate the compilation of the answers to the consultation

↑

7. WORKING PROGRAMME [COM]

Document: [SUMMARY of RESPONSES re Planning - sharing good practices.pdf](#)

COM (HC) thanked the members for their contribution to the questionnaire (CRS programme) and presented a table summarising the proposals of the members. Comments were notably that exchanges were an opportunity to learn and that an appropriate amount of work should be planned in 2019 to make it feasible. There was a preference for workshops, with the first one around autumn 2019, combined with experiences exchanged by emails.

FI founded this exhaustive list as interesting and suggested to add cooperation with the GW WL mechanism and DW, because the crosstalk could enhance harmonisation of these activities. BE supported this suggestion, taking as an example the perfluorinated compounds and newer PBT substances. COM (HC) indicated that COM will look into how to progress this issue.

UK noticed a low interest in the climate change and asked if it would be appropriate to pass this item to the WG-Groundwater. FI pointed out that there is a direct link with surface water, e.g. through more rain runoff flushes. COM (HC) concluded that it is an item of interest for the WG-Chemicals.

DK, supported by EFPIA, suggested that information related to the Marine Strategy Report prepared by JRC should be shared because it could be useful for additional chemicals in freshwaters. EUROMETAUX also pointed to the JRC Monitoring Report from the 2nd Review of Priority Substances (2016). COM (HC) acknowledged that this was not shared, but could be useful, and thus will see if sharing is possible.

EFPIA suggested that sharing the reporting on EQS would be useful to underline why it is important to distinguish EQS in different waters. COM (HC) asked if a workshop was a way to progress this issue. EFPIA agreed that a workshop could be a good solution, but also that a written procedure would help developing EQS guidance. SE highlighted the importance of the harmonisation between the MS due to the current significant variations in their procedures, and that it was important to use some application experiences of the new findings before updating the guidance. AT observed that nobody arrives at the same EQS because of freedom, notably in the assessment factors. EEA confirmed that it was complicated to draw together an overview of the variations among the MS, but they will try to present a summary of the data in a table. COM (HC) indicated that they will explore both a platform and a workshop for EQS harmonisation.

Actions / item 7 / Working Programme:

- COM will launch on CIRCABC an updated WP table;
- COM and members will exchange by emails to suggest dates for workshops & written exchanges.

↑

8. STRATEGIC APPROACH TO PHARMACEUTICALS IN THE ENVIRONMENT [COM]

Document: none.

COM (HC) presented the strategy divided into six action areas: increase awareness and promote prudent use; support development of less harmful pharmaceuticals for the environment; improve risk assessment and its review; reduce wastage and management of waste; expand environmental monitoring; and filling other knowledge gaps. More information is available on the website page of the European Commission “Strategies against chemical pollution of surface waters”, and in the Communication COM (2019) 128 final.

BE remarked that there is a knowledge gap about medicines, for example on the use of virus instead of antibiotics against salmonella or pneumonia, and that this was a cost choice, but should be rethought. COM (HC) acknowledged that other therapeutic strategies are known. EFPIA indicated that these approaches are not sufficiently advanced to replace the current ones. COM, with DE and NL, is planning an event on the 30th of May to compare the approaches to tackle the pharmaceuticals in the environment. Invitations will be sent to the Water Directors. The programme will be provided as soon as it is ready.

DK asked what will be done to take into account that pharmaceuticals have over mode of actions than the usual chemicals. COM (HC) indicated that the first target was to enhance the data needed for assessment the fate and the degradation products, and to link them to monitoring. DK also asked about the links with the OECD activities. COM (HC) indicated that they were in close contact and that a meeting had been scheduled for January.

Health Care Without Harm Europe qualified the strategy as “weak”, because it is similar to the one proposed a year ago, without a link with antibiotic resistance and without the objective to remove them from the environment; the expectation was therefore that this strategy was only a first step forward. COM (HC) noted that this was a first-needed step, notably for assessment objectives. IT asked for the assessment document to be shared to streamline the co-development of the AMM guidance and the WFD guidance. COM (HC) assured that when the risk assessment is ready, the link will be sent to the members of the WG-Chem.

EUREAU asked if comments could be made on this communication. COM (HC) responded that the document cannot be changed, but that any suggestion on actions is still welcomed. In addition, JRC (T) indicated that a workshop will be planned to identify the real priorities, probably in 2020, but this needs to be approved.

Actions / item 8 / Approach to pharmaceuticals in the environment:

- COM will send the link to the Assessment Report, as soon as available.

[↑](#)

9. ICPR RECOMMENDATIONS FOR REDUCING MICROPOLLUTANTS IN WATERS [ICPR]

Document: [WG Chem April 2019 \(9\) ICPR Recommendations for Reducing Micropollutants in Waters.pdf](#)

LU (TB) presented the objectives set in 2008 by the International Commission for the Rhine Protection; and transformed in 2017 into the decisions concerning joint measures for the Rhine state improvement. Two main pollution for which the pathways had to be clarified was pharmaceutical substances and radiocontrast agents. The challenges for the municipal collecting and treating systems were to implement measures at the source of the pollution to keep the wastewater treatment costs as low as possible. In agriculture for example, this had led to measures at the source by refining the technical applications, better defining the riparian zones, draining the farm effluents, setting storm water discharges, with supporting extensive information campaigns.

COM (HC) asked how far these measures could be linked to the pollutant monitoring data. LU noted that these measures were agreements between MS e.g. on how far the technologies could be set. EURELECTRIC wondered about cost-benefit analysis. CH indicated that such an analysis was not available.

BE asked for elaboration around the mention of PFC pre-treatment. LU did not know the details. NL indicated a national ongoing project that could contribute to this question.

EUROMETAUX raised some concern about asking “more than BAT” because no cost-benefit analysis is associated with the measure. LU indicated that the measures were not necessarily new, and if EQS were not met actions were required. This subject is also developed in item 12.

Actions / item 9 / ICPR recommendations for reducing micropollutants in water:

- None; however, for additional information see the links provided in item 12.

[↑](#)

10. RELEVANT POLICY DEVELOPMENTS [COM]

10a) Industrial Emissions Directive

[Document: WG Chem April 2019 \(10\)\(a\) IED-evaluation-WFD-Chemicals-WG_v2.pptx](#)

COM (CC) in the context of the IED (Directive 2010/75/EU) evaluation called for submission of evidence. The Directive is seen as an instrument to regulate large emitters in very various sectors (energy, metal, mineral, chemical, waste and others) based on two pillars; the permitting system managed by MSs and the Best Available Techniques (BATs). In 2019 the bulk of the process will be available and mid-2019 stakeholders will be consulted, through a 2-week consultation of the general public, a consultation targeted on specific groups, and workshops to confirm the scope. Three questions were identified as of particular relevance for the WFD experts: does the IED ensure that industries contribute sufficiently to the Water Quality goals; if not what the problems are; and is there one IED requirement not correctly applied. Responses can be sent to the email addresses indicated in the presentation.

EUROMETAUX asked if more recent data (rather than from 2014) could be used and for the evaluations of the IED contributions “share of emissions to water” those that are regulated elsewhere should be distinguished from those that are not regulated at all. EUROMETAUX raised a question on which models the ecotoxicity calculations were based. COM (CC) promised to go back to the authors of the study to clarify.

EUROMETAUX also referred to the provisional study from the IED-WFD Berlin workshop in 2017. COM welcomed the reminder and confirmed that they revisit the report to include in the Evaluation activity.

AT observed that linking monitoring data to both WFD and IED measures and is a challenge. COM (CC) indicated that indeed bringing better together these activities needs further inputs, e.g. for each BAT working group expectation is that any link is raised so that their inclusion in the BREF documents can be accelerated.

10b) Water Rhine

COM (HC) explained that the proposals were under discussion at the Council and Parliament, notably on subjects such as implication on water reuse, risk management and the required assessments.

IT asked if there were some intentions to add other limit values, other substances or other parameters. COM (HC) confirmed that some proposals were made, as the inclusion of microplastics, but also added that additions depend on technical feasibility and the outcome of discussions.

FI asked if risk assessment of reuse/recycle wastewater was included. COM (HC) answered that EQS must be taken into account, and that it should also include microbiological contaminants.

10c) Contact materials.

COM (HC) explained that the negotiations were also ongoing but with some oppositions, so that the outcomes were difficult to predict at this moment.

Actions / item 10 / Relevant policy developments:

- Members are invited to respond until 26th of April to the three questions / Evaluation of IED;
- COM will launch the IED presentation on CIRCABC.

[↑](#)

11. AOB – NEXT MEETING [COM]

Actions / item 11 / AOB – next meeting

- COM will confirm the next meeting planned the 22nd and 23rd of October 2019.
- The EEA report on Pesticides in waters is planned to be finalised by the end of 2019 and the draft will be submitted to the MS. Members will be kept informed.
- As the Priority Substances list should be worked out this year, COM will address this issue in the autumn.
- COM will check and confirm where the first version of EQS guidance can be found on CIRCABC.



12. EMISSIONS PERMITTING AND NON-DETERIORATION [COM]

COM (HC) indicated that presentations and extended discussion were expected, so that all participants were encouraged to contribute to during and after each presentation.

12a) Introduction / COM ENV

Some recalls were made on how the Permitting works at the MS level, this was seen as useful in the discussions on how legislation is decided with links to the WFD.

12b) Weser River ruling case C-461/13 / DE

“The request has been made in proceedings between Bund für Umwelt und Naturschutz Deutschland eV (German federation for the environment and the conservation of nature) and Bundesrepublik Deutschland (the Federal Republic of Germany) concerning a scheme to deepen various parts of the river Weser in the north of Germany, intended to enable larger container vessels to access the German ports of Bremerhaven, Brake and Bremen”.

FI asked if article 4(7) exemption only applies to new installations or also to the renewal of installations. COM (HC) responded that the article could only apply to existing installations if they were extended without deterioration.

EUROMINES expressed its concern regarding a simple renewal without any change in the activity. COM pointed out that the Competent Authorities have to identify the pressures and relate them to the activities, and that additional measures should be assessed and decided when necessary, and it should not be considered as a “new activity”

EUROFER asked if an expansion should be considered as a new activity. COM indicated that in principle it is, but that it depends on the impacts so would need some qualification.

FI noted the possibility of other exemptions, clarified by COM to be 4(4) and 4(5), e.g. for a “mixing zone”. FI also asked if the link to groundwater was handled in this case. DE confirmed that the groundwater question was ongoing in Court case, and by analogy that the outcome is expected to be similar.

12c) Presentation on reporting of emissions to water in the EU / Deltares and EEA

The emissions report offers potential to show trends in the amounts of particular chemicals being released. However, several works showed that there is little reporting on diffuse sources and on urban wastewater treatment plant (UWWTP) effluents; as well as unclear quality of emission data of industrial sources (not all facilities, not all relevant pollutants),

inconsistent reporting in time and space (no comparable and consistent time ranges and not all river basin districts reported), and some double reporting or reporting gaps (WFD, E-PRTR, WISE-SoE, UWWTD).

COM (HC) asked the members for any clarification. No questions were raised.

12d) Discussion paper on three dilemmas to encourage the discussions / DK

Dilemma-1. Exhaust gas cleaning process was put in place because mercury air emissions from biomass energy production were too high, but this measure was associated with an increase of mercury concentration in wastewaters. If further deterioration occurs, setting less stringent environmental objectives according to art. 4(5) does not seem to be the solution. DK asked if other MSs also experienced such a case and found a way to handle it.

NO was aware of some similar partial transfer from air to water, and even though the pollution was reduced overall, the water quality was at risk of deterioration. UK agreed that environment should be assessed entirety, and therefore if the mercury concentration in water is slightly increased, it should be considered as trivial compared to the overall gain. Moreover, through the emissions in air, one part is deposited and contributes to the water concentration. AT also thought that it was not necessary to reach a zero concentration in water and could be considered as an interpretation of article 3(5).

DK mentioned a similar situation with the transition from coal and gas power station to greener solutions, which is the policy in their country and is considered as a reduction of emissions overall. COM (HC) said that it was also like emissions from shipping and asked if members had other examples to share. Regarding shipping, BE pointed out that even if on-board dry scrubber and heavy full modifications were imposed, the non-European countries would not accept such constraints.

DK asked if the only solution was to set the wastewater treatment plants so to obtain the appropriate dilution, or whether the WFD should be set with more flexibility in its articles 4 and 5.

BE asked for time for reflection and maybe further exchange of comments. COM (HC) agreed but asked that a deadline be set.

Dilemma-2. Whereas the Weser ruling is specific in defining deterioration in relation to quality elements where there are five levels of status, the guidance for EQS with only two status levels (good/ not good) is missing. For example, how should a concentration rise that makes the water body going from good status to failing to achieve good status be interpreted, and how should this same concentration rise but with the status remains good be interpreted.

NO asked if the second case could be called a “less significant rise”. COM (HC) acquiesced. DE also interpreted the Weser ruling with respect to the non-deterioration of a good chemical status as the absence of “any further exceedance of an environmental quality standard”. COM (HC) indicated that the objective is to understand the particular element whose increase is responsible for the deterioration of water quality. IT wanted to know how the risk of failing the good quality could be measured. EUROFER asked if the increase in concentration of other metals in a water body with a bad status due to a specific element e.g. mercury could be an acceptable deterioration. COM (HC) responded, and was supported by

DE, that this was possible if EQS is not failed. EUROFER asked if the deterioration principle can be considered as substance specific. COM (HC) confirmed that it can.

SE asked if other approaches than only 2 classes (i.e. only one high quality level) were used. EEA indicated that some countries used 3 classes, but never 5. FI indicated that they are thinking about using a 75% threshold.

IE questioned the expression “when it causes”, because it implies that the link is made with individual projects, resulting in a full knowledge of the pathways, and so asked at what point should the investigation link the drivers with the EQS failing. This is an issue for industries because if one is the main source the others then have great uncertainties. DK, SE and DE also had concerns because whatever the activity increase is, it will be considered as unacceptable. LU also faced a similar failure with ammonia ecological status, related to the numerous WWTPs; so, even if the population increases, one logic is to divert all this water to regions with bodies holding a good status, e.g. the Moselle River. This would lead to a problem with the wastewater Directive. The problem is also the same with companies and it seems unrealistic to assume the absence of economic development. COM (HC) highlighted that the mercury and nitrogen exemptions are different. AT interpretation was that if the contribution of one industry is only a few percentages of the total emissions not authorising would be disproportionate.

EUROMETAUX pointed out the discussions on emission limit considered so low that detections boundaries were reached, illustrated for example by the Waste Incineration BREF document review discussions that took a long time and could not find an overall solution.

UK has recalled the EC communication published in 2014 on “Towards an integrated approach to cultural heritage for Europe”. COM (HC) confirmed this as relevant and thanked UK for this reminder.

Dilemma-3. According to the EQS directive the mercury EQS for biota is 20 µg/kg wet weight and no AA-EQS is given for the water phase, whereas this is required to set conditions in industrial emission permits. In the EU data sheet for mercury the EQS water is tentatively recalculated as 22 pg/L, a value that is below the limit of detection achieved in the Danish monitoring program (200-900 pg/L) and that is often close to the background levels. DK asked if other MSs also experienced similar difficulties and how they dealt with them. In addition, DK wished that the Commission provides guidance on how to calculate the relations between chemical water emissions and increases in sediment and biota and how to consider when there are emissions from several sources to the same receiving compartment.

EUROMETAUX underlined the uncertainties regarding the surface water Hg EQS, which is extrapolated, using a number of factors, from the biota EQS.

NL indicated that they had derived a water EQS for mercury, 70 pg/L, so still below the LOD, and will provide the link to the technical report.

UK faced some similar difficulties, and as a backstop to permitting use the old water EQS. COM pointed out that it is highly dependent on bioaccumulation and biomagnification and so that further research was needed. COM (HC) will forward some recent expected developments related to this issue. BE stressed that the local investigation with further measures will be an additional cost for MSs. UK stated that the 25 pg/kg was a protection for human consumers but could be at risks for top predators, so that it could be asked if

additional work should not be done to evaluate the significance of this risk. EEA found in its reports that in some European waters there was a problem even for fish. UK acknowledged the need indeed to further investigate for mercury. COM (HC) clarified that the discussions should not focus only on mercury.

Dilemma-4: In the BREF-document for large combustion plants, a number of best available techniques (BAT) are listed for flue gas cleaning. However, even when applying BAT, levels of mercury in scrubber water cannot be reduced to a sufficient level that can be emitted to the water environment. DK thus asked if the treatment techniques used in other MSs are sufficiently effective. DK also wanted more information on the INTEREG project HAZBREF (Hazardous Industrial Chemicals in IED BREFs) and suggested a presentation by COM on the ongoing works on the priority hazardous substances relations with IED and BREFs.

EURELECTRIC and EUROFER considered that there is a strong dilemma if the BATs are not sufficient to comply with the EQSs, and there are no other available techniques. COM (HC) asked if they are the very best available techniques or if the BATs also integrate economic considerations. However, the objective of these discussions was only the interactions between both Directives.

COM (HC) thanked DK for its contributions that encouraged the discussions and invited the members to further respond by email to DK's questions.

12e) Experiences and views from the Swedish Water Alliance (SWA)

The alliance covers five sectors (wastewater associations, local authorities and regions, industry, energy and agriculture). For 10 years they have been working to increase the scientific and legal understanding of the WFD, and notably the benefits to water quality. Their observation is that further development and improvements are required to achieve a good water quality by 2027.

Among the presented cases was SSAB Special Steels (Oxelösund production site), for which a permit was granted in 2007. A court decision supported the permit and set the final limit values for emission of suspended particles, zinc, and free cyanides from blast furnace in August 2018 in accordance with BAT-AEL (2 mg/L), combined with an annual average limit value (1 mg/L). However, the regional authority appealed the decision in November 2018, referring to the non-deterioration principle (as interpreted in the Weser ruling) and requested lowering of the daily average limit from 2 mg/L to 1 mg/L, although zinc was not affecting the ecosystem negatively as shown in previous studies conducted by the Stockholm University. The consequence will be that SSAB will use more chemicals to decrease zinc emissions. From this example SWA raised the dilemma of focusing more on the details rather than having a holistic approach to protect the ecosystems; SWA also highlighted that the CIS Guidelines do not help to clarify the Weser ruling.

NO asked if this was a renewal permit case. SWA confirmed that it was. COM (HC) asked if it was related to EQS exceedance. SWA answered that it was not directly related to the EQS exceedance of the water body and, in addition, the observed concentration of zinc was higher in the adjacent area compared with the waterbody to which SSAB emits. . EUROMETAUX clarified that if a waterbody failed chemical status due to a particular substance, under the non-deterioration principle this did not mean other substances could not be introduced, as long as they were below the EQS. LU asked if at the end any real

technical possibility to change was available. SWA answered that there is no technique available and therefore the only way is to use more chemicals (see above) and concluded that the environmental benefit is minor. SWA re-iterated the difficulty to comply with both the IED and the WFD in this case, and also observed that the amounts of zinc emitted would not have any effect because of the large coastal recipient. COM (HC) highlighted that the metal does not disappear and so it should continue to be assessed. SWA responded that this was not required as long as the concentration is below the EQS level. IE used this example to reiterate the challenges for industries related to the uncertainties if authorities frequently modify EQS and request for new technological investments.

COM (HC) thanked SWA for its interesting contribution.

12f) Issues for industrial permits / NO

Industries which discharge into water must monitor, coordinate it with other emitters, and send their plan to the Competent Authorities. Monitoring covers the biological quality elements, pollutants and metals. They are carried out (or required) mostly in biota and sediment, and less frequently in water. Monitoring stations close to the emission points are considered as not representative for the overall status of the water body. Any individual project that may cause deterioration of a water body or failure to achieve good status is refused. Article 4(7) does not allow for new or increased inputs of pollutants from point or diffuse sources if the water body status is below high, and therefore no exemption is granted regarding a fall of one class in the chemical status or if the chemical status is already in the lower class. However, regarding the arguments supporting permits for new activities or expansion of existing ones, NO asked about experiences from other MSs, notably a permit demand related to a water quality already in the lower class.

COM (HC) clarified that the requested discussion was about new permits and examples of this type of case.

SE mentioned a salmon production project with an industrial approach, which was rejected because a good status for benthos was not achieved. An impact analysis showed the absence of a link between the activity and the water status; however, the ongoing Court procedure will probably not accept the permitting. NO expressed its interest in receiving some additional information about this case.

DK asked how the monitoring obligation was implemented and coordinated. NO indicated that in 2018 they reviewed all monitoring and permits and concluded about the needed rules. These ones were set as a baseline for all industries and some additional assessments with more monitoring may be required only case-by-case. LU was surprised that this work was done for each Company and asked if these monitoring data were public. NO confirmed that it was an official information without confidentiality.

BE indicated that a significant risk to fail was difficult to estimate from emissions that they assessed it on a case-by-case basis most of the time, notably based on trends or integrating techniques as passive sampling. NO indicated that the significance could also be estimated by comparison of samples near or far from emissions and use a 10% contribution as an indicator

COM (HC) thanked Norway for this example of Permitting management related to WFD/EQS.

12g) Permitting process in the Czech Republic / CZ

Under the Water Act and its governmental order, there is a competent water authority in the permitting system, which is organised within three levels, Municipalities with extended competences, Regional offices, and the Ministries of Environment and of Agriculture. In addition, there is a specific Commission for transboundary cases. Substances are also separated into three levels: common, hazardous harmful (e.g. heavy metals, oil products, pesticides), and especially hazardous harmful (e.g. Hazardous Priority Substances, some POPs). The basic permitting for common contaminants is for 10 years, but 4 years for others. For IPPC installations, there is a unique permit instead of several ones, so it covers the Permit for Water protection, including rules for accidents, the Permit for extracting of groundwater, and the Permit for discharging of wastewater. The emission limits in IPPC permits are set according to the BREFs and BAT conclusions, and a recent national wastewater legislation improved the compatibility and compliance with BAT conclusions (Governmental Order No. 401/2015 Coll.).

NO asked if they have mixing zones. CZ indicated that they were using this approach only for PS, and without a defining the rules.

COM (HC) highlighted that this presentation was an opportunity to compare the systems regarding the interaction between Permitting and WFD/EQS.

12h) Permitting process in Romania / RO

The National Administration “Romanian Waters” (NARW) has local/regional/national levels. Permitting is delivered at two levels: The Water Notification/Permit for design of works, buildings, activities on water/with water impact; before putting into operation; and the Water Licence for works into operations with emissions into water resources (only rivers). The Granting procedure is based on the very important feasibility/technical study that tests full compliance with legislation in force and Management Plan for “good water status” and is conducted by one of the certified private companies (set up by legislation). The water notification is valid for up to 2 years, and the water licence from 1 to 4 years. For wastewater discharges, the compliance is based, on the one hand, on the ELVs from IPPC and on the BATs, and on the other hand, on the water EQSs for priority substances. In the case of water licence, more stringent ELVs can be proposed to fit local conditions and include EQS and combined approach strategy. The legal instruments include monitoring obligations such as concentrations of PS, and general indicators such as TOC, DOC, BOD, AOX, BTEX, Redox; and penalties, fines and other water taxes.

COM (HC) concluded that a follow-up should be planned for these issues for which exchanges between MS can be useful. The deadline for comments to contribute to the IED evaluation will be extended up to 30th April.

Actions / item 12 / Emissions permitting and non-deterioration:

- For item 12d, COM will indicate a deadline to discuss by email experiences related to the case where an overall reduction of emissions is associated with a possible concern related to the deterioration principle.
- Members will discuss the different issues raised during this item by email.
- COM will upload all the presentations on CIRCABC.



ANNEX 2: TABLE OF FOLLOW-UP ACTIONS / CIS WG CHEMICALS MEETING OF 16-17 APRIL 2018, BRUSSELS

Item	Subject	Actions	Responsible	Deadline
1	Welcome and agenda	Adopted as that, no action	/	/
2	Minutes of previous meetings	Upload on CIRCABC.	COM	ASAP
		Comments.	Members	Not later than 2 weeks before the next meeting.
		Adoption.	All	Next meeting
3	Implementing metals EQSs	Finalisation of the merged & EC-formatted Guidance.	COM	May
4	Fitness Check of WFD - FD	The detailed analysis will be uploaded as soon as ready.	COM	May
5	Watch List (WL)	Some last corrections.	JRC	When appropriate
		Launch on CIRCABC	COM	When appropriate
		Indication how to consult the inputs of other MS.	EEA	When appropriate
6	Plastics/Microplastics	Circulation of the compilation of the answers.	COM	When appropriate
7	CIS Working Programme (WP)	Table presenting the interest of the MS will be updated and uploaded on CIRCABC.	COM	ASAP
		Exchanges by email to suggest dates for workshops & written exchanges.	COM and members	When appropriate
8	Strategic approach to pharmaceuticals in the environment	Link to the Assessment Report.	COM	When appropriate
9	Recommendations for reducing micropollutants in water	See links in the IED discussion (item 12).	/	/
10	Relevant Policy Developments	a) Presentations on CIRCABC And answers to the three questions to WFD experts / Evaluation of IED.	COM Members	ASAP 26 th April
		b) Water Rhine >> no action	/	/
		c) Drinking water >> share of the outcomes of the ongoing negotiations when there are finished.	COM	When appropriate
11	AOB	a) Date of the next meeting >> Confirmation of the 22/23th October (depends on room availability).	COM	When appropriate.
		b) The EEA report on Pesticides in waters is planned to be finalised end of 2019 >> draft will be submitted to the MS and members kept informed.	COM	When appropriate
		c) As PS list should be worked out this year >> COM will come back on this issue in autumn.	COM	Before Autumn

		d) Check where the first version of EQS guidance can be found on CIRCABC.	COM	ASAP
12	Emissions permitting and non-deterioration	Launch of the presentations on CIRCABC.	COM	ASAP
		Further comments and feedback of national experiences.	Members	30 th of April
		Additional links to relevant reports (combined approach suggested by UK, recycling suggested by Austria, other permitting examples from Sweden, EEA reports, ...).	COM	ASAP

↑



Aktdetaljer

Akttitel: ANNULLERET: Opdateret notat og talepinde - konsekvenser af ny afgørelse fra Miljø- og Fødevarerklagenævnet

Aktnummer: 7

Akt ID: 384480

Dato: 20-03-2023 10:19:47

Type: Intern

Dokumenter:

- [1] Bilag 2 - Notat - NOVO - mulige konsekvenser af nævnsafgørelse NY.docx
- [2] Bilag 1 - Talepinde - konsekvenser af klagenævnsafgørelse.docx (MEDTAGES IKKE)
- [3] Cover minister.docx (MEDTAGES IKKE)
- [4] Cover minister (annoteret af PØH).pdf (MEDTAGES IKKE)

Den 13. marts 2024



Oversigt over, hvilke konsekvenser Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenede stoffer forventes at få for Novo Nordisk

Baggrund

Novo Nordisk A/S består af følgende virksomheder:

- Novo Nordisk Kalundborg
- Novo Nordisk Pharmatech
- Novo Nordisk Bagsværd
- Novo Nordisk Hillerød
- Novo Nordisk Brogårdsvej
- Novo Nordisk Hagedornsvej

Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenende stoffer vil få betydning for en lang række virksomheder. Miljøstyrelsen har lavet en oversigt over, hvilken betydning denne afgørelse forventes at ville få for igangværende ansøgninger om miljøgodkendelse inden for Novo Nordisk koncernen (se også bilag 1).

Novo Nordisk Kalundborg og Novo Nordisk Pharmatech har igangværende ansøgninger om miljøgodkendelser og revurderinger af miljøgodkendelser, som umiddelbart ikke vil kunne gives pga. klagenævnsafgørelsen.

NOVO sites som påvirkes af klagenævnsafgørelsen

Novo Nordisk Kalundborg:

Miljøstyrelsen har modtaget en foreløbig ansøgning om miljøgodkendelse til et stort projekt til udvidelse med blandt andet en ny gæringsfabrik, grovrensningsfabrik, finrensningsfabrik samt en frysetørrebygning. Det foreløbige ansøgningsmateriale mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af klagenævnsafgørelsen.

Novo Nordisk planlægger en udvidelse, som over en årrække vil indebære en fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Renseanlægget er derfor netop nu ved at udarbejde en opdateret miljøvurdering, og søger om forøget udledning til Jammerland Bugt. Denne ansøgning vil blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om en nødstrømsgenerator. Miljøstyrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget be-

grænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger (beregninger af nedfald fra luft) til projektet, som dermed ikke bliver påvirket af klagenævnsafgørelsen.

Novo Nordisk Pharmatech:

Miljøstyrelsen er i gang med at udarbejde revurdering af miljøgodkendelse¹. I den forbindelse har Miljøstyrelsen stillet krav om, at drænvand fra en grøft, som virksomheden indtil nu har ledt direkte ud til Køge bugt, skal godkendes, således den opfylder miljøkvalitetskravene. Det vil ikke være muligt at give denne godkendelse pga. klagenævnsafgørelsen, men virksomhedens nuværende udledning vil kunne fortsætte, indtil der generelt findes en løsning. Tilsvarende for revurderingen.

Virksomheden har fremsendt ansøgning om miljøgodkendelse af en facilitet med flere funktioner (multipurpose facilitet), som skal benyttes til fremstilling af affinitetsresiner (et materiale som kan binde stoffer). Der er tale om et mindre projekt. I forbindelse med behandlingen af ansøgningen om miljøgodkendelse, vil der være behov for at lave depositionsregning (beregning af nedfald fra luften). På baggrund af klagenævnsafgørelsen vil det ikke være muligt at meddele miljøgodkendelse af projektet.

NOVO sites som ikke påvirkes af klagenævnsafgørelsen

Novo Nordisk Hillerød:

Miljøstyrelsen har modtaget en ansøgning om udvidelse af en bygning med en ny produktionsfacilitet til fremstilling af aktivstoffer til blødermedicin. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinjer. Der er tale om et større projekt. Der vil i forbindelse med dette projekt ikke blive udledt stoffer, der kræver en depositionsregning. Projektet vil derfor ikke blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om etablering af en nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger til projektet, og det vil ikke blive påvirket af klagenævnsafgørelsen.

Novo Nordisk Bagsværd:

Den igangværende større ansøgning, som blandt andet indeholder en udvidelse af gæringskapaciteten og etablering af en helt ny grovrensingsfabrik, vil ikke blive påvirket af klagenævnsafgørelsen, da der ikke vil være emission af stoffer, der kræver en depositionsregning.

Novo Nordisk Brogårdsvej:

-
- ¹ Revurdering på baggrund af CWW BREF, dvs BAT-referencedokument for [Spildevands- og luftrensning og dertil hørende styringssystemer i den kemiske industri](#) (CWW, Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector)

Der er ikke nogle igangværende projekter.

Novo Nordisk Hagedorns vej:

Der er ikke nogle igangværende projekter.

Øvrigt:

Der er 3 af NOVOs virksomheder, der har søgt og modtaget en godkendelse til brændselsomlægning fra naturgas til olie. Disse miljøgodkendelser er meddelt, inden afgørelsen fra Miljø- og Fødevarerklagenævnet har meddelt deres afgørelse.

Bilag 1

Igangværende sager på alle Novo Nordisk fabrikkerne, som kan blive påvirket af midlertidig stop for afgørelser af sager med spildevand og deposition

Opgaver markerede med rødt, er igangværende opgaver som bliver påvirket af det midlertidige stop.

Novo Nordisk Kalundborg	<p>Der er fremsendt en foreløbig ansøgning om en ny gæringsfabrik, grovrensfabrik, finrensfabrik og en frysetørrebygning. Der mangler væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af afgørelsen.</p> <p>En fordobling af spildevandsafledningen fra Novo til Kalundborg centrale renseanlæg. Den øgede mængde spildevand medfører en forøget udledning til Jammerland Bugt og vil blive påvirket af klage-nævnsafgørelsen</p> <p>Igangværende godkendelsessag om 2 Brown-out anlæg (nødgeneratorer). Miljøstyrelsen har vurderet, at når anvendelsen kun omfatter nødstrøm, så skal der ikke udarbejdes depositions-beregninger for projektet pga. ubetydelig påvirkning, op til 12 timer årligt</p>
Novo Nordisk Pharmatech	<p>Virksomheden pumper i dag drænvand væk fra en grøft. Indtil nu har de ledt det ud uden en tilladelse, men i forbindelse med CWW revurderingen, har styrelsen stillet krav om, at der skal gives en godkendelse til denne udledning, således den opfylder miljøkvalitetskriterierne. Dette er ikke muligt med det midlertidige stop.</p> <p>Virksomheden har ansøgt om miljøgodkendelse til en Multipurpose facilitet, hvor der vil være luftafkast. Dermed vil dette projekt blive påvirket, som følge af krav om depositions-beregninger.</p>

	CWW BREF revurdering er i gang, og vil også blive påvirket af klagenævnsafgørelsen.
Novo Nordisk Bagsværd	Den aktuelle ansøgning om miljøgodkendelse som sagsbehandles, indeholder ikke udledning af stoffer, hvor der kræves depositionsregning.
Novo Nordisk Hillerød	<p>Der er modtaget en ansøgning om miljøgodkendelse mhp. udvidelse af bygning 25 K med en ny produktionsfacilitet 25K2 til fremstilling af API. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinier. Der er den 7. oktober 2022 givet dispensation til bygge- og anlæg. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Miljøstyrelsen har modtaget ansøgning om etablering af en Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), og der skal derfor ikke udarbejdes depositionsregninger for projektet. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Der er givet tilladelse til omskiftning mellem naturgas og olie</p>
Novo Nordisk Brogårdsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie
Novo Nordisk Hagedørnsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie



Aktdetaljer

Akttitel: ANNULLERET: Notat til STM om suspension af vejledninger om udledning af miljøfarlige forurenende stoffer

Aktnummer: 6

Akt ID: 384057

Dato: 17-03-2023 15:06:45

Type: Intern

Dokumenter: [1] Cover minister STM.docx (MEDTAGES IKKE)
[2] Bilag 1 - Notat til STM om ny afgørelse fra Miljø- og Fødevareklagenævnet.docx (MEDTAGES IKKE)
[3] Bilag 2 - Notat - NOVO - mulige konsekvenser af nævnsafgørelse.pdf

Den 13. marts 2024



Oversigt over hvilke konsekvenser Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenede stoffer forventes at få for Novo Nordisk

Baggrund

Novo Nordisk A/S består af følgende virksomheder:

- Novo Nordisk Kalundborg
- Novo Nordisk Pharmatech
- Novo Nordisk Bagsværd
- Novo Nordisk Hillerød
- Novo Nordisk Brogårdsvej
- Novo Nordisk Hagedornsvej

Miljø- og fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenende stoffer, vil generelt få betydning for virksomhederne. Miljøstyrelsen har lavet en oversigt over hvilken betydning denne afgørelse forventes at ville få for igangværende ansøgninger om miljøgodkendelse indenfor Novo Nordisk koncernen (se også bilag 1).

NOVO sites som påvirkes af klagenævnets afgørelsen

Novo Nordisk Kalundborg:

Der er modtaget en foreløbig ansøgning om miljøgodkendelse til et stort projekt til udvidelse med blandt andet en ny gæringsfabrik, grovrensningfabrik, finrensningfabrik samt en frysetørre bygning. Det foreløbige ansøgningsmateriale mangler de væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af klagenævnets afgørelse.

Miljøstyrelsen har endvidere modtaget en ansøgning om Brown-out nødstrømsgenerator. Miljøstyrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger til projektet, som dermed ikke bliver påvirket af klagenævnets afgørelse.

Novo Nordisk Pharmatech:

Miljøstyrelsen er i gang med at udarbejde revurdering af miljøgodkendelse¹. I den forbindelse har Miljøstyrelsen stillet krav om, at drænvand fra en grøft, som virksomheden indtil nu har ledt direkte ud til Køge bugt, skal godkendes, således den opfylder miljøkvalitetskravene. Det vil ikke være muligt, at give denne godkendelse pga. klagenævnsafgørelsen, men virksomhedens nuværende udledning vil kunne fortsætte, indtil der generelt findes en løsning. Tilsvarende for revurderingen.

Virksomheden har fremsendt ansøgning om miljøgodkendelse af en ny multipurpose facilitet, som skal benyttes til fremstilling af affinitetsresiner. Der er tale om et mindre projekt. I forbindelse med behandlingen af ansøgningen om miljøgodkendelse, vil der være behov for at lave depositionsberegning. På baggrund af klagenævnsafgørelsen vil det ikke være muligt at meddele miljøgodkendelse af projektet.

NOVO sites som ikke påvirkes af klagenævnsafgørelsen

Novo Nordisk Hillerød:

Miljøstyrelsen har modtaget en ansøgning om udvidelse af bygning 25K med en ny produktionsfacilitet til fremstilling af API (de aktive stoffer N8 og N9 – som anvendes til blødermedicin). Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinjer. Der er tale om et større projekt. Der vil i forbindelse med dette projekt ikke blive udledt stoffer, der kræver en depositionsberegning. Projektet vil derfor ikke blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om etablering af Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsberegninger til projektet og vil ikke blive påvirket af klagenævnsafgørelsen.

Novo Nordisk Bagsværd:

Den igangværende større ansøgning, som blandt andet indeholder en udvidelse af gæringskapaciteten i bygning 1S og etablering af en helt ny grovrengningsfabrik, vil ikke blive påvirket af klagenævnsafgørelsen, da der ikke vil være emission af stoffer, der kræver en depositionsberegning.

Novo Nordisk Brogårdsvej:

Der er ikke nogle igangværende projekter.

Novo Nordisk Hagedorns vej:

Der er ikke nogle igangværende projekter.

Øvrigt:

-
- ¹ Revurdering på baggrund af CWW BREF, dvs BAT-referencedokument for [Spildevands- og luftrensning og dertil hørende styringssystemer i den kemiske industri](#) (CWW, Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector)

Der er 3 af NOVOs virksomheder, der har søgt og modtaget en godkendelse til brændselsomlægning fra naturgas til olie. Disse miljøgodkendelser er meddelt inden afgørelsen fra Miljø- og fødevareklagenævnet har meddelt deres afgørelse.

Bilag 1

Igangværende sager på alle Novo Nordisk fabrikkerne, som kan blive påvirket af midlertidig stop for afgørelser af sager med spildevand og deposition

Opgaver markerede med rødt, er igangværende opgaver som bliver påvirket af det midlertidige stop.

Novo Nordisk Kalundborg	<p>Der er blevet fremsendt en foreløbig ansøgning om en ny gæringsfabrik, grovrensfabrik, finrensfabrik og en frysetørrebygning. Der mangler de væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere om dette projekt vil blive påvirket af afgørelsen.</p> <p>Igangværende godkendelsessag, om 2 Brown-out anlæg. Miljøstyrelsen har vurderet, at når anvendelsen kun omfatter nødstrøm, så skal der ikke udarbejdes depositionsregninger for projektet pga. ubetydelig påvirkning, op til 12 timer årligt</p>
Novo Nordisk Pharmatech	<p>Virksomheden pumper i dag drænvand væk fra en grøft. Indtil nu har de ledt det ud uden en tilladelse, men i forbindelse med CWW revurderingen, har styrelsen stillet krav om, at der skal gives en godkendelse til denne udledning, således den opfylder miljøkvalitetskriterierne. Dette er ikke muligt med det midlertidige stop.</p> <p>Virksomheden har ansøgt om miljøgodkendelse til en Multipurpose facilitet, hvor der vil være luftafkast. Dermed vil dette projekt blive påvirket, som følge af krav om depositionsregninger.</p> <p>CWW BREF revurdering er i gang, og vil også blive påvirket af klagenævnsafgørelsen.</p>
Novo Nordisk Bagsværd	Den aktuelle ansøgning om miljøgodkendelse som sagsbehandles, indeholder ikke udledning af stoffer, hvor der kræves depositionsregning.

Novo Nordisk Hillerød	<p>Der er modtaget en ansøgning om miljøgodkendelse mhp. udvidelse af bygning 25 K med en ny produktionsfacilitet 25K2 til fremstilling af API. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinier. Der er den 7. oktober 2022 givet dispensation til bygge- og anlæg. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Miljøstyrelsen har modtaget ansøgning om etablering af en Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), og der skal derfor ikke udarbejdes depositionsregninger for projektet. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Der er givet tilladelse til omskiftning mellem naturgas og olie</p>
Novo Nordisk Brogårdsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie
Novo Nordisk Hagedornsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie



Aktdetaljer

Akttitel: Talepinde - konsekvenser af nye afgørelse fra Miljø - og Fødevareklagenævnet

Aktnummer: 5

Akt ID: 382746

Dato: 16-03-2023 14:24:08

Type: Intern

Dokumenter: [1] Bilag 1 - Talepinde - konsekvenser af klagenævnsafgørelse.docx (MEDTAGES IKKE)
[2] Bilag 2 - Notat - NOVO - mulige konsekvenser af nævnsafgørelse.pdf
[3] Cover minister.docx (MEDTAGES IKKE)

Den 13. marts 2024



Oversigt over hvilke konsekvenser Miljø- og Fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenede stoffer forventes at få for Novo Nordisk

Baggrund

Novo Nordisk A/S består af følgende virksomheder:

- Novo Nordisk Kalundborg
- Novo Nordisk Pharmatech
- Novo Nordisk Bagsværd
- Novo Nordisk Hillerød
- Novo Nordisk Brogårdsvej
- Novo Nordisk Hagedornsvej

Miljø- og fødevareklagenævnets afgørelse om udledning af miljøfarlige forurenende stoffer, vil generelt få betydning for virksomhederne. Miljøstyrelsen har lavet en oversigt over hvilken betydning denne afgørelse forventes at ville få for igangværende ansøgninger om miljøgodkendelse indenfor Novo Nordisk koncernen (se også bilag 1).

NOVO sites som påvirkes af klagenævnets afgørelsen

Novo Nordisk Kalundborg:

Der er modtaget en foreløbig ansøgning om miljøgodkendelse til et stort projekt til udvidelse med blandt andet en ny gæringsfabrik, grovrensningssfabrik, finrensningssfabrik samt en frysetørre bygning. Det foreløbige ansøgningsmateriale mangler de væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere, om dette projekt vil blive påvirket af klagenævnets afgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om Brown-out nødstrømsgenerator. Miljøstyrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsregninger til projektet, som dermed ikke bliver påvirket af klagenævnets afgørelsen.

Novo Nordisk Pharmatech:

Miljøstyrelsen er i gang med at udarbejde revurdering af miljøgodkendelse¹. I den forbindelse har Miljøstyrelsen stillet krav om, at drænvand fra en grøft, som virksomheden indtil nu har ledt direkte ud til Køge bugt, skal godkendes, således den opfylder miljøkvalitetskravene. Det vil ikke være muligt, at give denne godkendelse pga. klagenævnsafgørelsen, men virksomhedens nuværende udledning vil kunne fortsætte, indtil der generelt findes en løsning. Tilsvarende for revurderingen.

Virksomheden har fremsendt ansøgning om miljøgodkendelse af en ny multipurpose facilitet, som skal benyttes til fremstilling af affinitetsresiner. Der er tale om et mindre projekt. I forbindelse med behandlingen af ansøgningen om miljøgodkendelse, vil der være behov for at lave depositionsberegning. På baggrund af klagenævnsafgørelsen vil det ikke være muligt at meddele miljøgodkendelse af projektet.

NOVO sites som ikke påvirkes af klagenævnsafgørelsen

Novo Nordisk Hillerød:

Miljøstyrelsen har modtaget en ansøgning om udvidelse af bygning 25K med en ny produktionsfacilitet til fremstilling af API (de aktive stoffer N8 og N9 – som anvendes til blødermedicin). Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinjer. Der er tale om et større projekt. Der vil i forbindelse med dette projekt ikke blive udledt stoffer, der kræver en depositionsberegning. Projektet vil derfor ikke blive påvirket af klagenævnsafgørelsen.

Miljøstyrelsen har endvidere modtaget en ansøgning om etablering af Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), derfor skal der ikke udarbejdes depositionsberegninger til projektet og vil ikke blive påvirket af klagenævnsafgørelsen.

Novo Nordisk Bagsværd:

Den igangværende større ansøgning, som blandt andet indeholder en udvidelse af gæringskapaciteten i bygning 1S og etablering af en helt ny grovrengningsfabrik, vil ikke blive påvirket af klagenævnsafgørelsen, da der ikke vil være emission af stoffer, der kræver en depositionsberegning.

Novo Nordisk Brogårdsvej:

Der er ikke nogle igangværende projekter.

Novo Nordisk Hagedorns vej:

Der er ikke nogle igangværende projekter.

Øvrigt:

-
- ¹ Revurdering på baggrund af CWW BREF, dvs BAT-referencedokument for [Spildevands- og luftrensning og dertil hørende styringssystemer i den kemiske industri](#) (CWW, Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector)

Der er 3 af NOVOs virksomheder, der har søgt og modtaget en godkendelse til brændselsomlægning fra naturgas til olie. Disse miljøgodkendelser er meddelt inden afgørelsen fra Miljø- og fødevareklagenævnet har meddelt deres afgørelse.

Bilag 1

Igangværende sager på alle Novo Nordisk fabrikkerne, som kan blive påvirket af midlertidig stop for afgørelser af sager med spildevand og deposition

Opgaver markerede med rødt, er igangværende opgaver som bliver påvirket af det midlertidige stop.

Novo Nordisk Kalundborg	<p>Der er blevet fremsendt en foreløbig ansøgning om en ny gæringsfabrik, grovrensfabrik, finrensfabrik og en frysetørrebygning. Der mangler de væsentlige bilag. Miljøstyrelsen kan derfor ikke på det foreliggende grundlag vurdere om dette projekt vil blive påvirket af afgørelsen.</p> <p>Igangværende godkendelsessag, om 2 Brown-out anlæg. Miljøstyrelsen har vurderet, at når anvendelsen kun omfatter nødstrøm, så skal der ikke udarbejdes depositionsregninger for projektet pga. ubetydelig påvirkning, op til 12 timer årligt</p>
Novo Nordisk Pharmatech	<p>Virksomheden pumper i dag drænvand væk fra en grøft. Indtil nu har de ledt det ud uden en tilladelse, men i forbindelse med CWW revurderingen, har styrelsen stillet krav om, at der skal gives en godkendelse til denne udledning, således den opfylder miljøkvalitetskriterierne. Dette er ikke muligt med det midlertidige stop.</p> <p>Virksomheden har ansøgt om miljøgodkendelse til en Multipurpose facilitet, hvor der vil være luftafkast. Dermed vil dette projekt blive påvirket, som følge af krav om depositionsregninger.</p> <p>CWW BREF revurdering er i gang, og vil også blive påvirket af klagenævnsafgørelsen.</p>
Novo Nordisk Bagsværd	Den aktuelle ansøgning om miljøgodkendelse som sagsbehandles, indeholder ikke udledning af stoffer, hvor der kræves depositionsregning.

Novo Nordisk Hillerød	<p>Der er modtaget en ansøgning om miljøgodkendelse mhp. udvidelse af bygning 25 K med en ny produktionsfacilitet 25K2 til fremstilling af API. Der bygges 2 produktionsbygninger, der hver kan indeholde 2 produktionslinier. Der er den 7. oktober 2022 givet dispensation til bygge- og anlæg. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Miljøstyrelsen har modtaget ansøgning om etablering af en Brown-out nødstrømsgenerator. Styrelsen har vurderet, at der er tale om et nødstrømsanlæg med meget begrænset anvendelse (op til 12 timer årligt), og der skal derfor ikke udarbejdes depositionsregninger for projektet. Projektet vil ikke blive påvirket af klagenævnsafgørelsen.</p> <p>Der er givet tilladelse til omskiftning mellem naturgas og olie</p>
Novo Nordisk Brogårdsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie
Novo Nordisk Hagedornsvej	Der er givet tilladelse til omskiftning mellem naturgas og olie