



COMMISSION GUIDANCE

Commission Notice: guidelines on how to apply in practice definitions for sites, facilities and installations, laid down in Article 13(h) of the Industrial Emissions Portal Regulation (Regulation (EU) 2024/1244)

(Text with EEA relevance)

(C/2025/6534)

This Commission Notice is intended to help national authorities apply Regulation (EU) 2024/1244. Only the Court of Justice of the European Union is competent to authoritatively interpret EU law.

The guidance was developed by the European Environment Agency with the support of its European Topic Centre on Human Health and the Environment. The Commission would like to acknowledge the valuable contributions of the Industrial Emissions Portal Regulation Expert Group members and observers, who were actively involved and gave invaluable input throughout the project, including in workshops and written consultations.

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List of abbreviations

Abbreviation	Name
CID	Commission implementing decision
CCGT	Combined-cycle gas turbine
DAA	Directly associated activity
EEA	European Environment Agency
E-PRTR	European Pollutant Release and Transfer Register
IED	Industrial and Livestock Rearing Emissions Directive
IEPR	Industrial Emissions Portal Regulation
INSPIRE	Infrastructure for Spatial Information in Europe
LCP	Large combustion plant
MCP	Medium combustion plant
MCPD	Medium Combustion Plant Directive
UNECE	United Nations Economic Commission for Europe
WI	Waste (co-)incineration
WWTP	Waste water treatment plant

SUMMARY

Article 13(h) of Regulation (EU) 2024/1244 (the 'Industrial Emissions Portal Regulation' or 'IEPR') requires the Commission, assisted by the European Environment Agency and in consultation with Member States, to draw up and regularly update guidance supporting the implementation of the Regulation. The guidance sets out how to apply in practice the definitions of sites, facilities and installations laid down in the Regulation.

This guidance document provides a framework for accurate and consistent environmental data reporting from industrial sites in the EU. It aims to help clarify: (i) the definitions of 'site', 'facility' and 'installation' set out in the Commission Regulation (EU) No 1089/2010 ⁽¹⁾ (Infrastructure for Spatial Information in Europe (INSPIRE Regulation)) by aligning them with those in the IEPR; and (ii) the definition of an installation in the Industrial Emissions Directive (IED) 2010/75/EU, amended by Directive (EU) 2024/1785 ⁽²⁾. The document explains how these definitions fit into the hierarchical reporting structure required by the INSPIRE Regulation's framework for spatial data sharing.

Key sections include guidance on: (i) identifying sites, facilities and installations; (ii) describing the technical and operational connections between industrial units; and (iii) determining when multiple installations should be considered a single facility. The document also discusses 'directly associated activities', which should be considered when reporting emissions from an installation.

This guidance provides various examples to support the reporting under the IEPR. However, it is not exhaustive and does not cover every possible case. It is for the competent reporting authority in each Member State to apply the guidance, taking into account their national context.

1. INTRODUCTION

The Industrial Emissions Portal Regulation (IEPR) ⁽³⁾ was adopted on 24 April 2024 and replaces the European Pollutant Release and Transfer Register (E-PRTR) Regulation ⁽⁴⁾. It establishes an integrated pollutant release and transfer register at EU level and therefore implements the United Nations Economic Commission for Europe (UNECE) Protocol on Pollutant Release and Transfer Registers ⁽⁵⁾, commonly referred to as the PRTR Protocol or the Kyiv Protocol. The first reporting under the revised regulation will take place in 2028 when Member States will report data to the Commission on releases and transfers, resource use and other contextual information from industrial installations in scope for the 2027 reporting year.

The IEPR brings a change to the reporting level for releases compared to the E-PRTR, shifting from the facility level (which may encompass one or more installations) to the installation level. This will enable better alignment and consistency with the Industrial Emissions Directive (IED) 2010/75/EU, as amended by Directive (EU) 2024/1785 ⁽⁶⁾ (the Industrial and Livestock Rearing Emissions Directive (IED)), which regulates industrial emissions through the permitting of installations. The IEPR can therefore better support the IED's objectives and implementation and enable evaluation of the IED's effectiveness. The compilation of *Answers Given by DG Environment on the Implementation of the Industrial Emissions Directive – Chapter 1*, dated 18 January 2019 ⁽⁷⁾, was taken into account in the preparation of this guidance.

Moving to reporting at installation level is expected to have a limited impact on the reporting of releases from most industrial activities where a single facility encompasses a single installation. In other more diverse and complex situations, guidance and recommendations will be required on responding to the change to the reporting structure and on how to apply in practice the definitions of sites, facilities and installations laid down in the IEPR. The development of such guidance by the Commission, assisted by the European Environment Agency (EEA) and in consultation with Member States, was mandated by Article 13(h) of the IEPR.

⁽¹⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010R1089-20231119>.

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20240804>.

⁽³⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1244&qid=1716560231787>.

⁽⁴⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006R0166>.

⁽⁵⁾ https://unece.org/DAM/env/pp/prtr/Protocol%20texts/PRTR_Protocol_e.pdf.

⁽⁶⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20240804>.

⁽⁷⁾ https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/cbcfa4fc-cb8e-4cd7-bf7a-cbba10c28fb4?p=1&n=10&sort=modified_DESC.

This guidance document aims to fulfil that requirement by: (i) providing examples of what is a site, a facility and an installation; (ii) giving sector-specific examples of relationships between facilities and installations; and (iii) providing recommendations on how they should be applied and handled for industrial emissions reporting. A key goal of this document is to set out a common understanding of the terms ‘facility’ and ‘installation’ in the context of IEPR reporting among industrial operators and Member State competent authorities. Achieving this goal will ensure greater consistency and accuracy in the data reported.

This guidance document provides various examples to support reporting under the IEPR. However, it is not exhaustive and does not cover every possible case. It is for the relevant competent reporting authority in each Member State to apply it, taking into account their national circumstances.

This guidance document has the following structure:

- Section 2 describes the hierarchical reporting levels within industrial production sites;
- Section 3 defines each of the hierarchical levels;
- Section 4 explains how to identify sites, facilities and installations for IEPR reporting and provides details of technical units and technical connections;
- Section 5 presents several examples of facility/installation relationships;
- Section 6 contains concluding remarks and lists resources for further advice.

Commission Implementing Decision (EU) 2018/1135 ⁽⁸⁾ established the EU Registry on Industrial Sites, and this guidance is intended to complement the Manual for Reporters for the EU Registry on Industrial Sites ⁽⁹⁾ and any subsequent updates. The manual contains all the essential information for describing how industrial operators should report the relevant dataflows set out in the IEPR and the Industrial and Livestock Rearing Emissions Directive (IED). While this guidance can be used as a standalone document, it is recommended to be used in conjunction with the Manual for Reporters for the EU Registry on Industrial Sites.

This guidance document will not cover the aggregation rules applicable to rearing poultry and pigs as laid down in Article 70(b) of the revised IED. As noted in Article 70(b)(2) of the IED, the Commission will publish specific guidelines, after consultation with the EU Member States, ‘on the criteria for considering different installations to be a single unit’ in this sector under Article 70(b)(1) of the IED.

2. THE GEOGRAPHIC HIERARCHY

The hierarchical reporting of industrial production sites required under the IEPR and the Commission Implementing Decision (EU) 2018/1135 is based on the INSPIRE (Infrastructure for Spatial Information in Europe) Regulation ⁽¹⁰⁾ and involves organising and presenting information about industrial activities in a structured manner. The INSPIRE Regulation aims to create a harmonised framework for spatial data sharing across Europe, including data on environmental and industrial aspects. Industrial production sites are categorised based on their types, activities and environmental impacts. The hierarchical structure typically includes various levels that allow for reporting of different types of information, such as site location, production processes and emissions data. This approach facilitates the consistent integration of data from multiple sources, allowing for comprehensive spatial analysis, cross-border comparisons and informed decision-making on environmental policies and industrial regulation.

⁽⁸⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D1135&from=EN>.

⁽⁹⁾ Latest version as of 19 December 2024: https://cdr.eionet.europa.eu/help/euregistry/Documents/EU%20Registry_Manual%20for%20Reporters_v1.12.pdf.

⁽¹⁰⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010R1089-20231119>, Annex IV, Section 8.2.

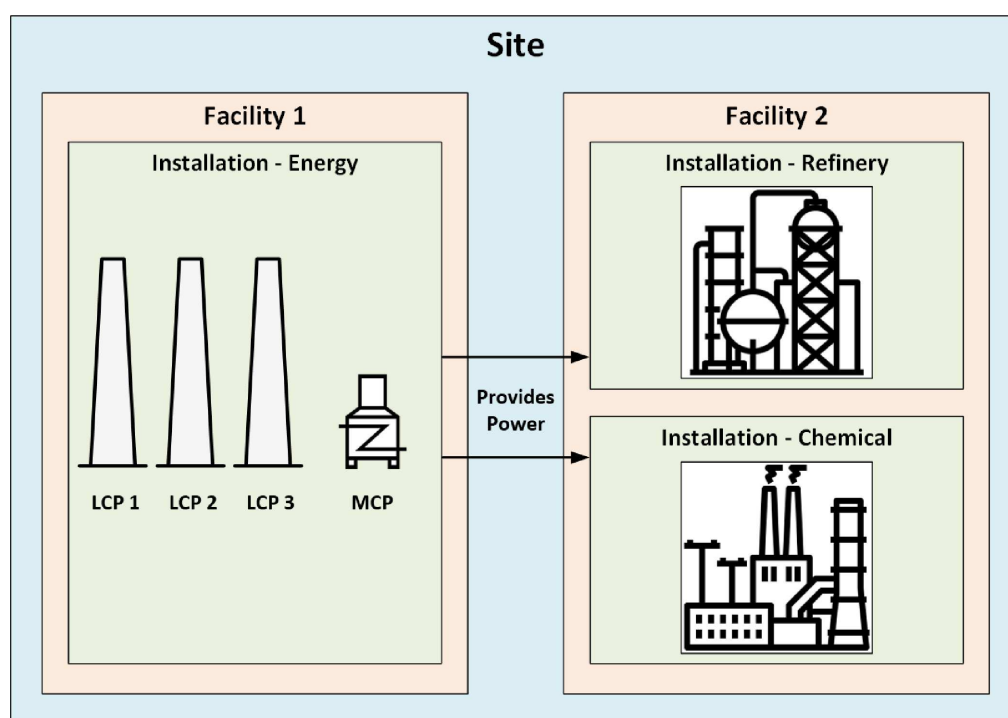
The INSPIRE Regulation data structure defines hierarchical layers within industrial production sites based on their geographical relationships:

- production sites;
- production facilities;
- production installations;
- production installation parts.

Figure 2.1 illustrates the hierarchy, as well as the scenario in which there is a technical connection between the power plant in Facility 1 and the refinery and chemical plant in Facility 2. Despite the technical connection (i.e. the supply of power, as indicated by the arrows), the facilities are operated by different natural or legal persons, and, as a result, the facilities are distinct – separated by operator (as required by the definition of ‘facility’ in the IEPR, see Section 3.2). The various combinations of facility, installation and technical connection are discussed in detail in Section 4.

Figure 2.1

A simple schematic diagram of an industrial site

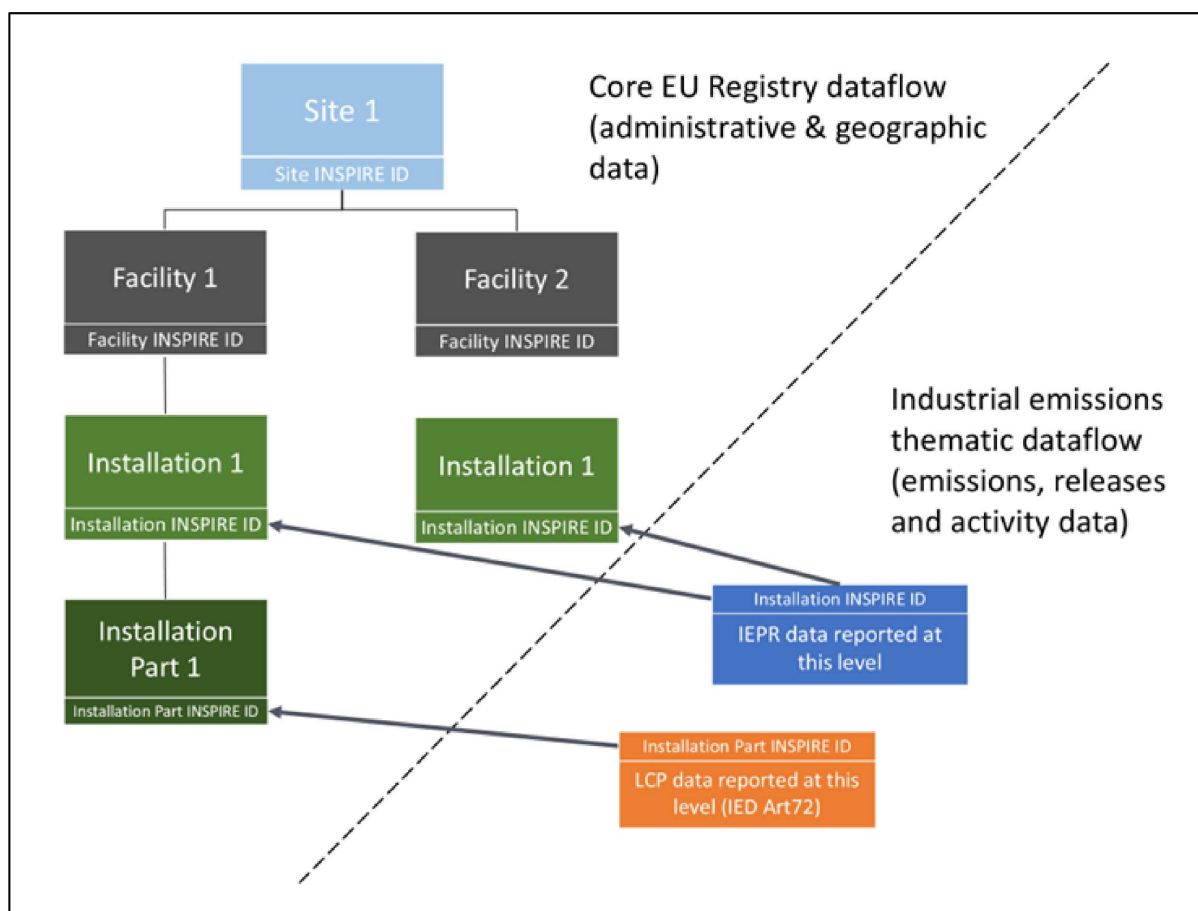


The PRTR Protocol requires the reporting of industrial activities in its scope at facility level and defines a facility in line with the INSPIRE Regulation. The IEPR requires the operator to report at installation level, which may be tracked at facility level; continuing to identify the parent facility of installations will provide continuity with historical time series (reported under the E-PRTR) containing emissions and transfers information at facility level. The IEPR also requires reporting of the parent site that contains the facility and installation(s). Therefore, while the IEPR now focuses on reporting environmental information on installations, there remains an important requirement to be able to present data at facility and site level.

Figure 2.2 illustrates the proposed new data flows for reporting administrative, geographic and thematic information under the IEPR. Most facilities that reported to the EU Registry on Industrial Sites in 2022 have a one-to-one relationship with an IED installation (e.g. Facility 1 contains Installation 1), and there are facilities that have more than one installation. It should be noted that the IED installation may also contain an installation part.

Figure 2.2

Industrial emissions data flows



3. DEFINITIONS

The definitions of site, facility, installation and installation part set out in the IEPR are explained in this section.

3.1. Site

Annex IV section 8.2.4 of the INSPIRE Regulation defines a production site as ‘All land at a distinct geographic location where the production facility was, is, or is intended to be located. This includes all infrastructure, equipment and materials.’ The IEPR states that ‘site means the geographical location of the installation and the facility’ (see Figure 2.1).

The Manual for Reporters for the EU Registry on Industrial Sites ⁽¹⁾, issued by the European Environment Agency (EEA) and supporting reporting countries in submitting data, clarifies that a site encompasses one or more industrial areas where activities are carried out by different operators of related facilities and installations. For a site to be identified, the following criteria are to be met:

- **Geographical proximity:** The facilities and their installations need to be physically in the same location. However, the fact that a site is divided by a physical barrier, such as a road, railway or river, does not automatically make it two separate sites.
- **Related activities:** If more than one facility or installation is to be included in the same site, all of them must either be joined by a technical connection or cooperate for a common purpose (e.g. a facility assembling cars and associated facilities in the car manufacturing supply chain on the same site).

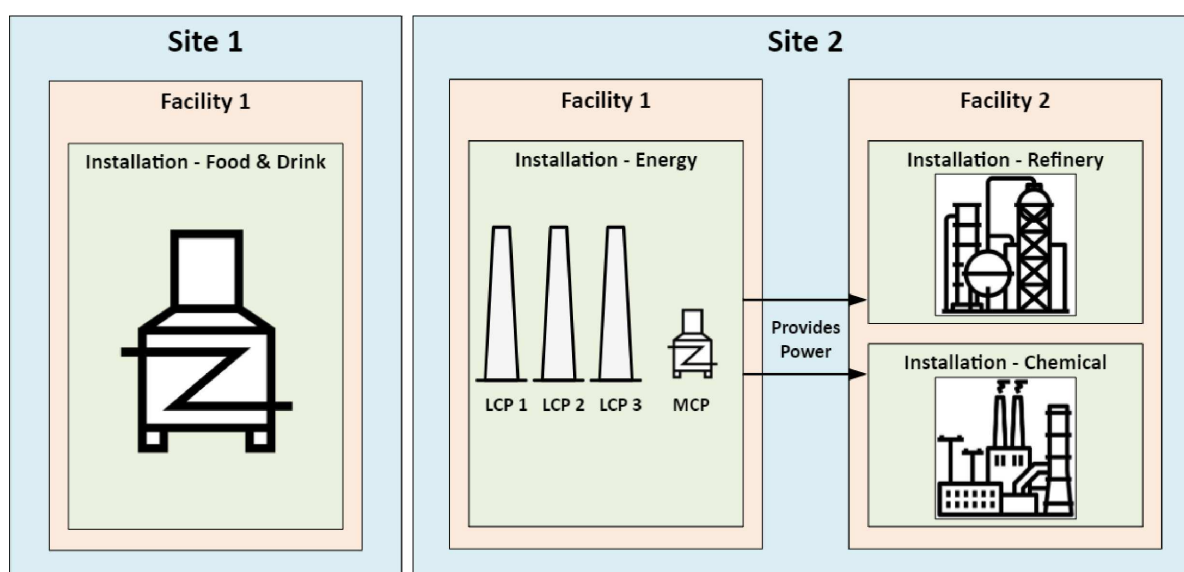
⁽¹⁾ https://cdr.eionet.europa.eu/help/eptr_lcp/Documents/E-PRTR-LCP%20Manual%20for%20reporters%20v1.6.pdf.

- **Disregard of ownership:** Ownership, in itself, does not play a role in defining a site, i.e. a site can include multiple facilities (with different owners/operators) if they are related as defined in the criterion above.
- **Disregard of urban planning:** Multiple sites can be located on a single coherent lot zoned for industrial activity according to urban planning. Where necessary, the sites must be distinguished by using the criterion in the second bullet above.

Figure 3.1 illustrates the situation where three adjacent facilities form two sites because there are no related activities shared between the two sites. Site 1 contains a food and drink production facility, operated by an independent brewing company; Site 2 contains two facilities that have different operators but have related activities.

Figure 3.1

A simple schematic diagram of two industrial sites



3.2. Facility

Annex IV section 8.2.1 of the INSPIRE Regulation refers to a production facility as ‘one or more installations on the same site operated by the same natural or legal person, designed, built or installed to serve specific production or industrial purposes, comprehending all infrastructure, equipment and materials’.

A facility as defined in Art 3 point 2 of the IEPR means ‘one or more installations, or parts thereof, that are on the same site and that are operated by the same natural or legal person’. It is still important to retain and use the concept of facility, even when the reporting of thematic data will be done at installation level. The main reasons for this are:

- compliance with the PRTR Protocol;
- compliance with Article 5(1)(a) of the IEPR, which requires that from 2028, the European Industrial Emissions Portal must allow users to search for and download data by facility;
- compliance with the INSPIRE Regulation;
- consistency with the historical time series of data previously reported under the E-PRTR.

Each facility must be reported separately under the IEPR, including information on the operator, geographic coordinates, name and function, regardless of whether the site contains: (i) one facility with one installation; (ii) one facility with multiple installations (e.g. a chemical plant and a power generation unit with the same operator); or (iii) multiple facilities (with different operators) with one or more installations (e.g. three chemical plants with different operators, an independently operated waste water treatment plant (WWTP) and a power plant serving the whole site). In all cases, each facility must be reported separately, with its own specific data and the same parent site identifier.

Under the IEPR, a facility is defined on the basis of the activities for which an operator is responsible on a site. The legal definition of ‘operator’, as set out in Art 3 point 15 of the IED and referred to in Art 3 point 8 of the IEPR, means ‘any natural or legal person who operates or controls in whole or in part the installation or combustion plant, waste incineration plant or waste co-incineration plant or, where this is provided for in national law, to whom decisive economic power over the technical functioning of the installation or plant has been delegated’. The operator is responsible for all the IEPR and IED activities at the facility. The land owner is irrelevant if they are not involved in operating the facility.

The operator (who might lease the facility from an owner or be the owner) is often the legal entity listed in the relevant permit (see Box 3.1). For an IED installation that has multiple operators covered by one permit (sometimes referred to as a ‘framework’ permit), multiple facilities and installations are to be identified under the IEPR, in line with the different operators’ responsibilities. To facilitate the analysis of environmental pressures from these facilities, they should be reported under the same parent site. Note that no actual splitting of a permit is required; this ‘virtual splitting’ is for IEPR reporting purposes only. Further details are provided in Section 4.2.

3.3. Installation

The INSPIRE Regulation refers in Annex IV section 8.2.2 to technical units, such as machinery, apparatus, devices or equipment placed in position or connected for use, as individual installations or production lines within an industrial facility where specific processes or activities are carried out. These units are typically part of a larger industrial site and are characterised by their functions, processes and emissions. Installations may consist of one or more technical units (e.g. reactors, furnaces or engines) that work together to carry out a particular function.

The IEPR and IED definitions of an installation are now almost identical. The only difference is that the IED in Art 3 point 3 refers to Annexes I, Ia and VII to the IED, while the IEPR in Art 3 point 1 refers to Annex I to the IEPR, which in turn refers to Annexes I and Ia to the IED. Therefore, the definition of an installation, as used in this guidance, is the IEPR definition, which includes the IED definition, except for the activities listed in Part 1 of Annex VII to the IED (installations and activities using organic solvents, since they are not necessarily part of annex I or Ia of the IED).

Box 3.1: The definition of installation used in this guidance document

The definition of an installation used in this guidance document matches the IEPR definition, which covers the same scope as the scope of the IED definition but excludes activities listed in Part 1 of Annex VII to the IED. The IEPR definition of installation is not intended to specify how installations are determined under the IED or how BAT Conclusions should be applied. The IEPR serves primarily as a reporting mechanism, while the IED provides the regulatory framework for determining installations for permitting purposes and applying BAT Conclusions. Furthermore, the IEPR introduces the concept of a ‘facility’, which is not present in the IED. This leads to situations where multiple operators manage parts of the same installation (e.g. in framework permits, as discussed in Section 3.2) being reported as multiple facilities, each containing one or more installations.

Although all activities in Annex I and Ia to the IED are now included in the IEPR, the IEPR’s scope includes the following additional activities:

- medium combustion plants (MCPs) ⁽¹³⁾ (where not covered by Annex I to the IED as a technical unit or directly associated activity (DAA – see chapter 4.3.2)) with a rated thermal input of at least 20 MW and below 50 MW;
- underground mining and related operations, including the extraction of crude oil or gas either onshore or offshore (where not covered by Annex I to the IED);
- opencast mining and quarrying (where not covered by Annex I to the IED, with an effective surface area under extractive operation of 25 hectares or more;

⁽¹³⁾ Combustion plants carrying out activities referred to in Article 2 of Directive (EU) 2015/2193.

- urban wastewater treatment plants with a capacity of 100 000 population equivalents or more;
- feed-based aquaculture with an annual production capacity of more than 500 tonnes;
- installations for building and/or dismantling ships, and for painting or removing paint from ships that have a capacity to accommodate ships 100 metres or longer in length;
- electrolysis of water for industrial scale production of hydrogen with a capacity of less than 50 tonnes per day ⁽¹³⁾.

Section 5 on sector examples has a subsection dedicated to non-IED activities in the scope of the IEPR.

3.4. Installation part

Under the INSPIRE framework, industrial activities can be reported at multiple levels, including site, facility and installation levels. The most detailed level of reporting that is in the scope of the IEPR is the installation part, which allows for detailed tracking of emissions or other data, such as energy use or incineration capacity from specific units within an installation. According to INSPIRE data specifications, an installation may comprise various parts serving distinct technical purposes; however, they are collectively treated as a single installation if they are legally or technically connected and operated as a single technical unit.

While the term ‘installation part’ is not explicitly defined in the IED or IEPR, it typically refers to components or sections of an installation, including large combustion plants (LCPs) and waste (co-) incineration (WI) plants. These installation parts are critical to the overall operation of an installation and are subject to specific regulatory requirements under Chapter III and IV of the IED as well as detailed reporting requirements under Article 72 of the IED and Commission Implementing Decision (EU) 2018/1135 establishing the type, format and frequency of information to be made available by the Member States for the purposes of reporting on the implementation of the IED.

Under the EU Registry on Industrial Sites, ‘installation part’ is also not defined but is understood as a functional subunit within an installation. These subunits perform distinct tasks or processes that contribute to the overall emissions or environmental impact of the installation they are part of. For instance, LCPs and WI plants fall under Chapters III and IV of the IED, but only emissions from LCPs, under Article 72(3) of the IED, are integrated into the IEPR reporting mechanism under Commission Implementing Decision (EU) 2018/1135. WI plants do not have equivalent emission reporting requirements under the IED or IEPR, but they do have other requirements such as the reporting of the nominal and permitted incineration capacity. Both LCPs and WI plants are reported as ‘installation parts’ in the EU Registry on Industrial Sites.

Additionally, MCPs with a rated thermal input between 20 MW and 50 MW are also classified as installation parts for IEPR reporting purposes, provided they are not already covered by Annex I to the IED.

4. HOW TO CLASSIFY IEPR REPORTING UNITS

This section helps reporting countries to identify the different geographical characteristics for industrial sites, facilities and installations. Each level of the INSPIRE hierarchy is presented and analysed (see Table 4.1). Complex or nuanced situations will require a case-by-case consideration and may require consultation with permit writers at the competent authority with the EEA or with the Commission. The EEA Industry Helpdesk can be contacted at industry.helpdesk@eea.europa.eu.

⁽¹³⁾ While the IEPR activity refers only to ‘industrial scale production’, it is understood that if the activity has a production capacity of more than 50 tonnes per day, this would be in the scope of Activity 6.6 of the IED. It is therefore implicit that Activity 9 in Annex I to the IEPR refers to installations with a capacity below that threshold.

Table 4.1

Geographical characteristics of industrial entities

Hierarchy level	Description
Site	The overarching area of land that includes a single facility or multiple facilities with a functional association, either operational, economic or technical.
Facility	A collection of installations or technical units operating under the common management of an operator.
Installation	A specific stationary technical unit, or group of technically connected units, within a facility where industrial activities occur.
Installation part	Subcomponents of an installation, such as an LCP, an inline waste (co-)incinerator, an MCP (which is not covered as part of an IED installation), that contribute to the overall operations of an installation.

4.1. How to identify an industrial site for IEPR reporting

The following points should be considered to help the reporting of an industrial site containing one or more facilities and installations.

- **Focus on location:** The site refers to the physical location, not necessarily a single facility or installation.
- **Importance of connection:** Activities on separate areas can be considered part of the same site if they have a direct association with either an operational, economic or technical connection. These concepts can be described as set out below.
 - **Operational connection:** When different facilities work together to achieve a common industrial goal, they should be seen as part of a single site. For instance, if one facility processes raw materials and another assembles the final product, their interdependence makes them function together. Reporting them as one site ensures a more accurate representation of how the industrial process operates as a whole.
 - **Economic connection:** Separate facilities can be considered part of the same site if they are part of or contribute to a single economic activity, e.g. if they share financial resources, management or economic objectives. This connection highlights the integrated nature of operations, making it easier to understand the economic footprint and performance of the entire industrial activity if these facilities are reported as one site.
 - **Technical connection:** If facilities share technological infrastructure, utilities or technical processes, they can be considered as part of the same site. Their interconnected operations contribute to a complete industrial process and acknowledging these connections in the reporting provides a clearer picture of the industrial network and resource flows.

The importance of the connection lies in providing a more integrated view of industrial activities, ensuring that data on these activities accurately reflects the interconnected nature of operations across different areas. This helps in understanding the scale, efficiency and scope of industrial production more effectively.

- **Ownership:** Land ownership is irrelevant for determining the site.
- **Operators:** Multiple facilities (with different operators) can be considered as being on the same site if there is a direct functional association between their operations (operational, economic or technical).
- **Site boundaries:** Fences are not a reliable indicator for determining a site's boundaries.
- **Brief physical separations:** A road or right-of-way passing through the location does not determine a site boundary if the areas are reasonably close.

Example of importance of connection and location: Storage tanks connected by pipelines to a chemical plant are part of the same site.

However, storage tanks at a distant harbour will require expert judgement to determine if they belong to the same site as the main facility. The level of technical connection (e.g. pipelines, transportation methods) and the overall impact on the environment should be considered.

4.2. How to identify a facility for IEPR reporting

To determine the boundaries of a facility the following steps should be considered:

- **Ownership/operator:** An operator is responsible for the activities that determines the boundary of a facility. They might be a legal or physical person that leases the facility or the land from an owner or might be the actual owner. The operator is specified in the relevant permit. For an IED installation with multiple operators under one 'framework' permit, the operator definition virtually splits the one permitted installation into several facilities (with one or more installations), each linked to specific activities handled by different operators. Although these are technically 'parts of the installation' with separate operators, this approach allows for reporting within the IEPR structure of facilities and installations. No actual splitting of a permit is required; this virtual splitting is only for the reporting to be aligned with the IEPR definition of a facility.
- **Multiple installations:** A single facility can have multiple installations if they are operated by the same company or person, functionally connected and in reasonable proximity.
- **Functional connection:** This refers to one or more activities at a facility being used by the operator. These activities do not need to be technically connected and can encompass both IED and non-IED activities, for example an industrial WWTP treating leachate or sewage sludge (IED Activity 5.3(a) or 5.3(b)) and an urban WWTP treating domestic sewage (IEPR Activity 6), operated by the same company, with varying degrees of dependency. An example is an urban WWTP that also has a waste handling activity operated by the same company side by side at the same location. The two installations have no technical connection, but they have a functional connection because the company is responsible for operating both activities.

4.3. How to identify an installation for IEPR reporting

On 18 January 2019, DG Environment produced a compilation of *Answers Given by DG Environment on the Implementation of the Industrial Emissions Directive – Chapter 1* ⁽¹⁴⁾. These questions and answers cover definitions of an installation, operator, technical connection etc., and they have been considered throughout this section for consistency with definitions set out in and interpretations of the IED and the IEPR.

To determine the boundaries of an installation, the points below should be considered and assessed:

- **Multiple installations:** A single IEPR facility can have one or more installations if they are operated by the same company or person (see Section 4.2).
- **Permit coverage:**
 - One permit can cover one or more installations operated by the same operator at the same site (Article 4(2) of the IED).
 - A permit can refer to more than one operator with separate responsibilities for specific activities listed in the same permit (Article 4(3) of the IED). For IEPR reporting, these activities must be reported as separate facilities (with associated installations) because they have different operators. Splitting these activities is only a requirement for IEPR reporting purposes. No actual splitting of the permit is required.

⁽¹⁴⁾ https://environment.ec.europa.eu/topics/industrial-emissions-and-safety/industrial-and-livestock-rearing-emissions-directive-ied-20_en, under the item 'Guidance and implementing rules' in the section on 'Implementation'.

- **Identify the activity** (or activities) listed in Annex I to the IEPR.
- **Identify the stationary technical units** in which the activities are taking place and whether these are technically connected. If technically connected, evaluate if the connections are strong or weak. A strong technical connection indicates the technical units are to be considered as one installation. However, if the connection is weak, it indicates the presence of more than one installation.
- **For IEPR activities that are out of the IED's scope**, carry out the same evaluation of technical connections that could influence emissions and pollutions. This evaluation should identify if any of those activities (e.g. directly associated activities, DAAs) are to be included in the relevant installation.

Box 4.1: The importance of the operator under the IEPR

A 'framework' permit that includes multiple operators is often used for IED regulatory purposes for complex industrial sites. This type of permit usually aligns with the site concept as defined in the IEPR and outlined in this guidance document. However, the framework permit does not determine the reporting entity under the IEPR and IED CID as it allows a single permitted installation to have more than one operator. Therefore, the IEPR definition of facility, which is based on the operator, requires a permitted installation with multiple operators to be virtually split into separate facilities according to each operator's responsibilities. This virtual splitting is only for IEPR reporting purposes and does not require an actual split of the permit.

4.3.1. *Stationary technical unit*

The term 'stationary technical unit' is not explicitly defined in the INSPIRE Regulation, the IEPR or the IED. However, based on the concept of 'technical unit' and the requirement for installations to be stationary, the following definition should be considered for IEPR reporting.

- A stationary technical unit, in the context of the IEPR, refers to one or more integrated technical subunits that is specifically designed and equipped to carry out activities related to an installation (or a DAA) and that is permanently located at a fixed geographical site.

Box 4.2: The importance of technical units

- The concept of technical units helps clarify the scope of an installation.
- Although the IEPR regulates the reporting of emissions from activities carried out in an installation with technical units, movable equipment can still be used in these installations. Additionally, the IEPR (like the IED) might consider certain mobile units to be stationary if they operate at a fixed location for a significant period of time.

The following guidelines aim to help competent authorities and IEPR reporters determine if a technical unit is stationary.

What constitutes a stationary technical unit under the IEPR and IED?

A technical unit is considered as 'stationary' if it is not intended to move from one location to another. This does not prevent the use of mobile equipment (technical units), such as crushers, forklifts and other machinery within the installation, but these should be excluded from the reporting requirements applying to stationary technical units. Determining the stationary status of technical units ultimately lies with the competent authority. For the purposes of this document, 'technical unit' only refers to stationary technical units.

What about movable units that operate in a single location for extended periods of time?

'Mobile' units designed for relocation, such as tarmac production or incinerators for contaminated soil, can be considered as stationary if they operate at a specific site for a significant amount of time. Competent authorities will assess each case based on factors such as:

- the potential environmental impact of the activities;
- the expected and actual duration of operation at the location;
- the difficulty and resources needed to move and set up the unit: for example, a unit arriving on its own wheels is easier to relocate than one requiring significant construction at each site.

Some key aspects of a technical unit include:

- Integrated entity: A technical unit is not a single piece of equipment but rather several elements that work together as an installation. This can include one or more of the following elements:
 - equipment (reactors, filters etc.);
 - structures (buildings, tanks etc.);
 - infrastructure (pipelines, conveyors etc.);
 - tools and machinery;
 - facilities for the storage, handling and pre-treatment of materials;
 - monitoring and recording systems.
- Specifically designed and equipped: The elements in a technical unit or units in an installation are chosen to perform specific activities listed in the IEPR or a DAA. This excludes activities like open-air incineration, which has no dedicated equipment.
- Integrated operations: These elements function together in a coordinated manner to achieve a particular outcome in the IEPR installation or the DAA.

Examples of technical units

- A chemical production line in a factory, consisting of interconnected reactors, distillation columns and piping for processing raw materials.
- A dedicated wastewater treatment plant permanently located on-site to handle wastewater from an installation.
- A storage facility with tanks and pipelines for raw materials or finished products, permanently located in and integrated into the main installation.

What technical unit does not mean

- It does not refer to a single piece of equipment.
- It does not necessarily imply a high level of technological complexity.
- It does not require all elements to be physically connected or to be in the same building.
- A technical connection between technical units.

One or more technical units carrying out one or more activities can be considered to be technically connected if there is a physical link or operational dependence between them. The strength and dependency of the connection helps determine if the units should be considered as one installation or as separate installations under IEPR reporting.

The key aspects of a technical connection can be broken down as:

- **Physical link:** This refers to a direct physical connection between the technical units. Examples include:
 - **Pipelines:** Transporting raw materials, products, or waste streams between activities.
 - **Conveyors:** Moving materials (solids) between the installations.

- **Power lines:** Supplying electricity from one installation directly to another installation or to multiple installations.
- **Operational dependence:** This refers to how essential the technical unit is for the core operation of the other installation. Examples include:
 - **On-site wastewater treatment plant:** Treating wastewater generated by the installation before discharge.
 - **Dedicated storage tanks:** Holding raw materials or finished products specifically for the installation.

The strength of the technical connection is a crucial factor in determining if two or more technical units are considered part of the same installation. A strong technical connection suggests one technical unit directly supports the core activities and influences the environmental impact of another technical unit. Examples of technical connections:

- **Strong technical connection:** storage tanks connected by pipelines directly to a chemical plant for feeding raw materials. This clear physical link indicates a strong technical connection, although it remains crucial that a rigorous assessment is carried out to ensure the technical unit is required for the activity to operate. However, if the two units had different operators, then they would form different installations on different facilities.
- **Weaker technical connection:** a separate warehouse storing finished products from a chemical plant, even if located on the same site. Without a direct physical link or operational dependence, the technical connection might be weaker.

In borderline cases, it is crucial to consider the specific details and operational set-up in order to determine if a technical connection exists. This assessment is carried out by the relevant competent authority and therefore the decision of whether more than one technical unit qualifies as an installation for the purposes of reporting under IEPR rests with the competent authority.

The assessment should be based on relatively stable configurations of installations, excluding temporary or unusual arrangements. For example, a configuration that is only in place during a refurbishment or a decision based on exceptional circumstances – such as one installation providing raw materials to another only occasionally when other sources are unavailable – should not be used to define the installation. While installations may change over time due to factors like mergers or acquisitions, the goal is to maintain the site-facility-installation structure as stable and consistent as possible, reflecting the site's typical operations.

4.3.2. *Directly associated activities*

In the context of the IEPR and IED, 'directly associated activities' (DAAs) refer to activities that are not listed in the IEPR and IED annexes (meaning they would not require a separate IED permit). However, DAAs are:

- functionally and technically connected to an installation on the same site; this means they support or complement the core activities of the installation;
- likely to affect the overall environmental impact of the installation.

Key aspects of DAAs include:

- Supporting or complementary role: DAAs typically provide services or handle materials that are essential for the operation of the IED installation.
- Environmental impact: DAAs, but not IED activities themselves, could influence the emissions or environmental impact of the main installation. When assessing the impact, the competent authority should consider not only the potential for increased emissions or the environmental impact during the day-to-day operation of the installation but also the risk of accidents or spillages.
- For an activity to be a DAA, there does not need to be a fixed physical connection (as noted in the compilation of *Answers Given by DG Environment on the Implementation of the Industrial Emissions Directive – Chapter 1, dated 18 January 2019* ⁽⁵⁾).

Examples of DAAs:

- storage of raw materials or finished products directly connected to an installation, such as tanks or silos with pipelines feeding the process;
- wastewater treatment plants specifically designed to handle wastewater from an installation;
- on-site generation of power or heat used by the installation.

If the non-IEPR activity is not technically connected (e.g. administrative offices at an industrial site), they should not be considered DAAs in the context of the IEPR.

The key distinction between a DAA and a separate installation lies in the strength of the technical connection to the IEPR activity. Some factors to consider are:

- Physical connection: Are the activities physically linked through pipelines, conveyors or similar infrastructure?
- Operational dependence: Does the installation rely on the DAA for its core operations?
- Environmental impact: Does the DAA significantly affect the overall emissions or environmental footprint of the installation?

Ultimately, as with installations, determining whether an activity qualifies as a DAA rests with the relevant competent authority. They should consider the factors mentioned above to determine whether the activity should be reported together with the IEPR installation.

If an installation carries out both Annex I and non-Annex I activities, the releases and off-site transfers from the non-Annex I activities should be excluded from the reported data reported under the IEPR (unless it is a DAA). It might be not possible to separate and quantify the contributions of the non-Annex I activities, e.g. where no sampling point for the non-Annex I activity exists (in the case of highly interlaced sewer systems). In this case, it might be practical and cost effective to report the releases from non-Annex I activities together with those from Annex I activities.

5. SECTOR EXAMPLES

This section presents several examples of different sectors with varying levels of complexity that illustrate the concepts described above. Complex or nuanced situations will require a case-by-case consideration and may require consultation with permit writers at the competent authority, with the EEA or with the Commission. The EEA Industry Helpdesk can be contacted at industry.helpdesk@eea.europa.eu.

5.1. Power sector

The example in Figure 5.1 shows an electricity generation location with two large combustion plants (LCPs). It contains: (i) two 100 MW combined-cycle gas turbines (CCGTs), each with a capacity of over 50 MW and its own stack; (ii) a combustion boiler with a capacity of 45 MW; and (iii) an emergency diesel generator with a capacity of 10 MW. The only relevant IEPR activity in this example is Activity 1.1 *Combustion of fuels in installations with a total rated thermal input of 50 MW or more*. While there are multiple technical units, these would all be regarded as part of one installation, which in turn would be part of one facility and one site. Guidance on applying the common stack principle (Article 29 of the IED) is provided in Section 2.2.3 of the Manual for Reporters for the E-PRTR and LCP Integrated Data Reporting. Section 2.2.3 explains how to determine whether the different units can be considered an LCP under Chapter III of the IED. If they are considered an LCP, the units should be reported as an installation part with all the required data, such as rated thermal input, energy input, operating hours or emissions.

The emergency generator in this example is a DAA. It has a clear technical connection with the IEPR activity because its only purpose is to provide emergency power. The emergency generator and the 45 MW boiler, which would be permitted separately as an MCP, should be reported along with the emissions for the installation, but not as part of the LCPs. As noted in Annex I to the IEPR, MCPs do not need to be reported individually if they are part of an IED installation.

In the second power sector example in Figure 5.2, the CCGTs have a different operator than the smaller combustion units. Therefore, in this example, there are two facilities with one installation each. If the installation was issued with a framework permit covering all the combustion units, then the installation would have to be virtually split in two (as shown in the

second diagram) but only for IEPR reporting purposes. As outlined in the Manual for Reporters, Facility 2 would have an installation carrying out Activity 1.1, as the total capacity of 45 MW + 10 MW exceeds the 50 MW threshold. However, for Facility 2, no LCPs would be reported as installation parts due to the aggregation rules in Chapter III, which apply only to units with a capacity of 15 MW or greater.

On the other hand, Facility 1 would have an installation carrying out Activity 1.1 and either two installation parts of 100 MW each or one installation part of 200 MW. The latter would be the case if the two units have a common stack or if they are installed in such a way that, taking technical and economic factors into account, the competent authority judges that their waste gases could be discharged through a common stack (Article 29 of the IED).

Figure 5.1

Example of an electricity generation site with one operator

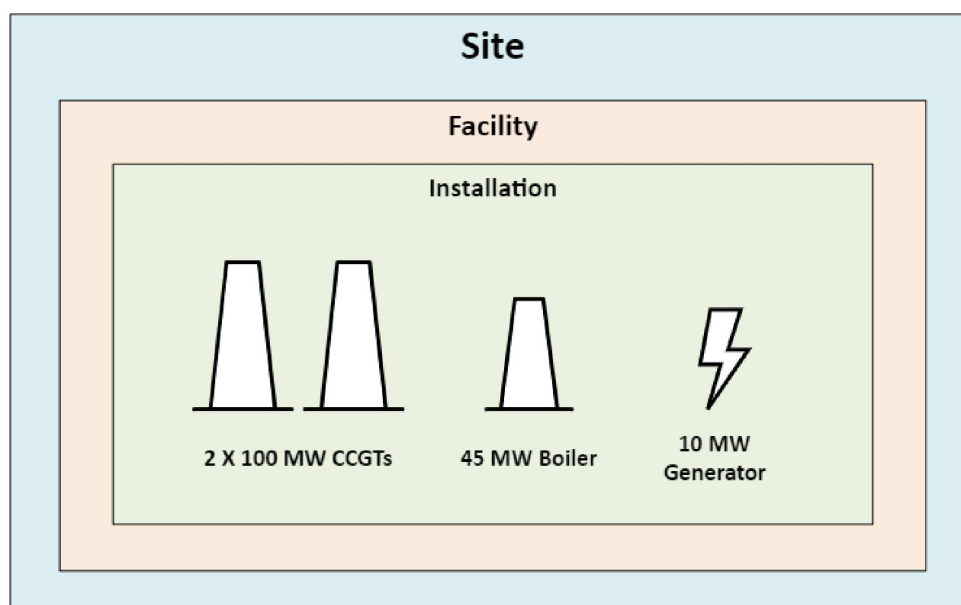
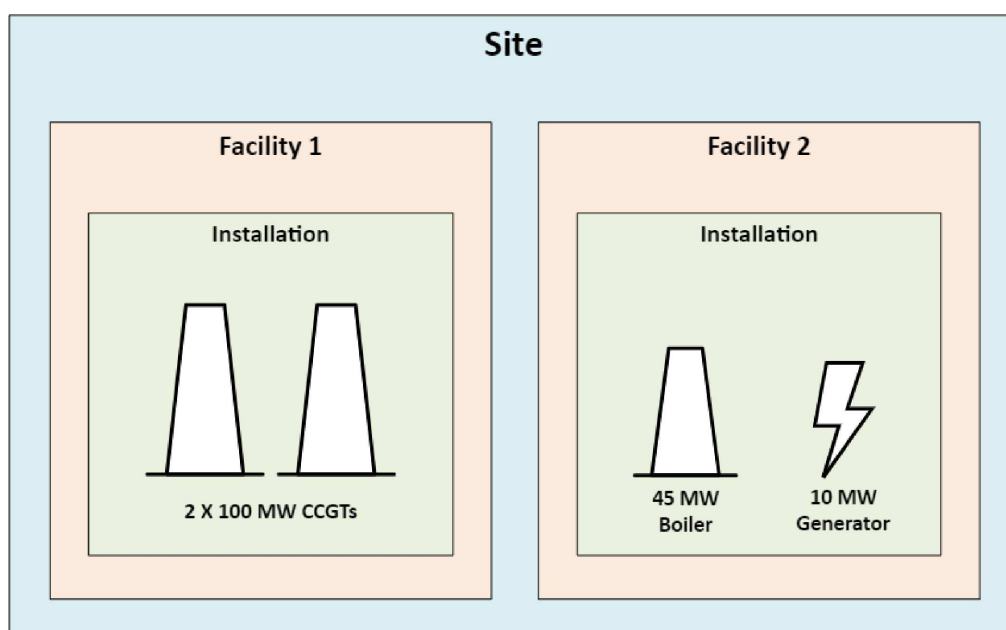


Figure 5.2

Example of an electricity generation site with two operators



5.2. Waste sector

This example consists of a waste management facility with three technical units: (i) a landfill; (ii) a waste processing unit; and (iii) a biogas plant. In Figure 5.3, the nearby landfill (Installation 1) receives non-recoverable waste from the processing plant. It is not technically connected to the biogas plant or the waste processing plant, even if it receives waste from them, as it is considered to be a final disposal site. Furthermore, since the landfill's primary purpose is disposal, which differs from the recovery-focused activities of the other units, it is classified as a separate installation (IED Activity 5.4).

Installation 2 is a waste processing plant that prepares waste for both the landfill and the biogas plant, and it also transfers other waste to external locations. Although it supplies feedstock to the biogas plant, its operations are mechanical, and the biogas plant could source waste from other locations. Given that it involves a different type of environmental impact and is not a critical component of the biogas production process, it is considered a separate installation.

In an alternative scenario in Figure 5.4, the operator decided that the waste processing plant's purpose – using preliminary digestion units designed solely to improve material breakdown and warm the substrate – is to serve as a pre-treatment unit for the biogas plant. This pre-treatment is essential for the proper functioning of the digestion process and involves a biological process that follows the initial mechanical processing. Therefore, in this scenario, the waste processing plant and biogas plant (IED Activity 5.3(a)(i) or 5.3(b)(i)) are technically connected – they form one installation.

The two installations may or may not be one facility; this will depend on whether they have separate operators. All these entities could be considered as being part of one site.

See Section 5.5 for examples of wastewater transfers, some reportable as waste tonnage, on a complex industrial site with a wastewater treatment plant.

Figure 5.3

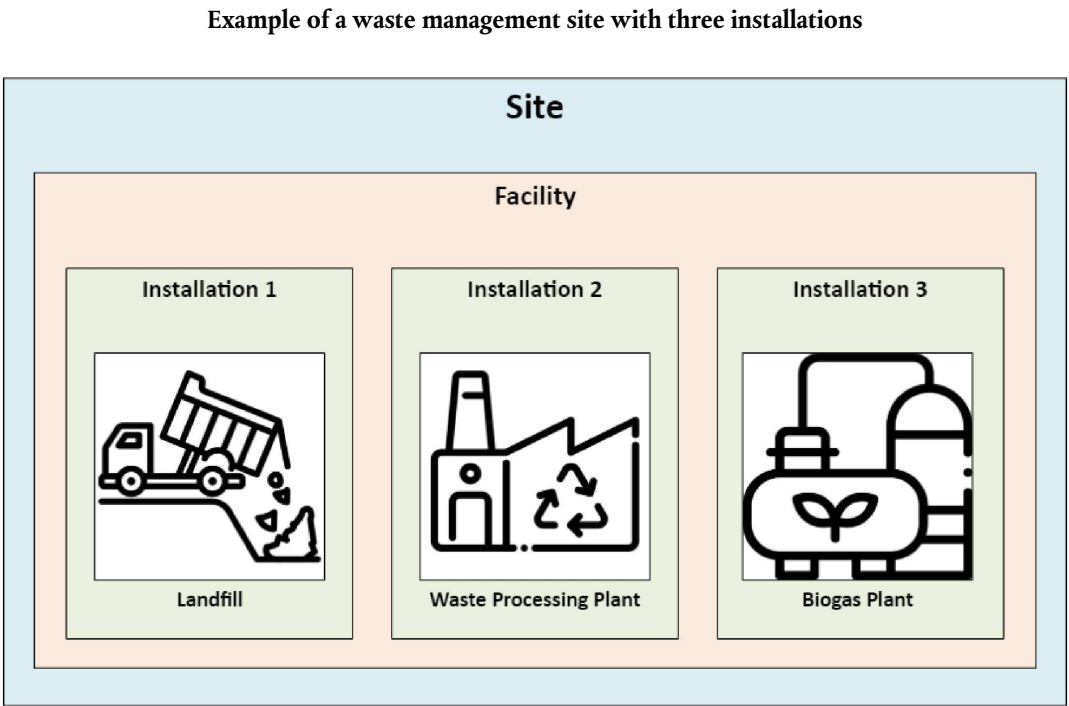
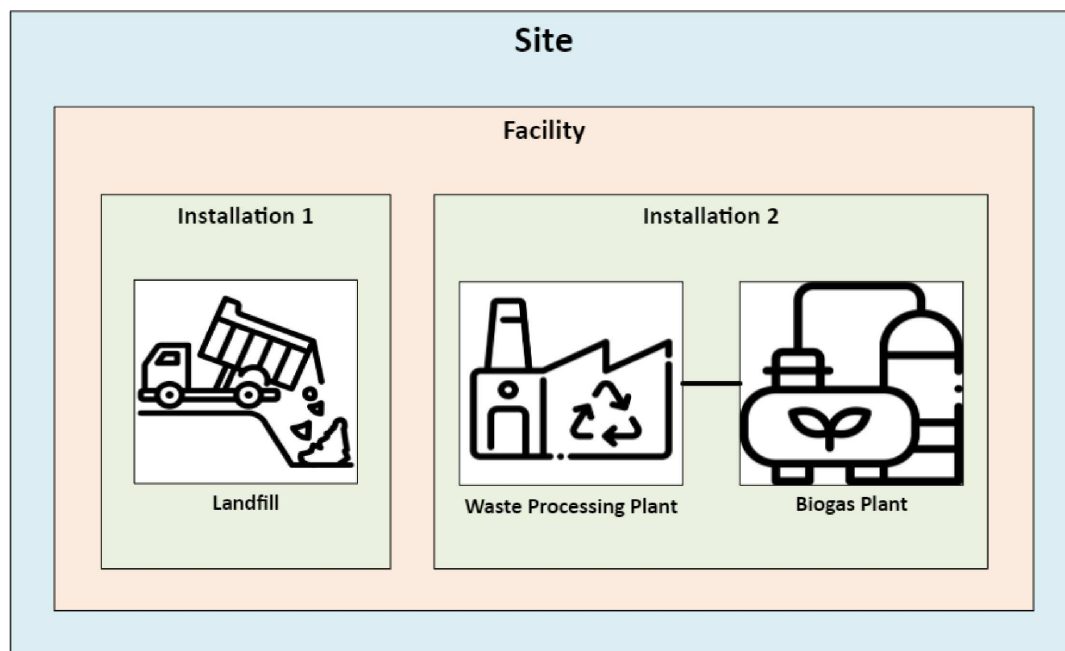


Figure 5.4

Example of a waste management site with two installations



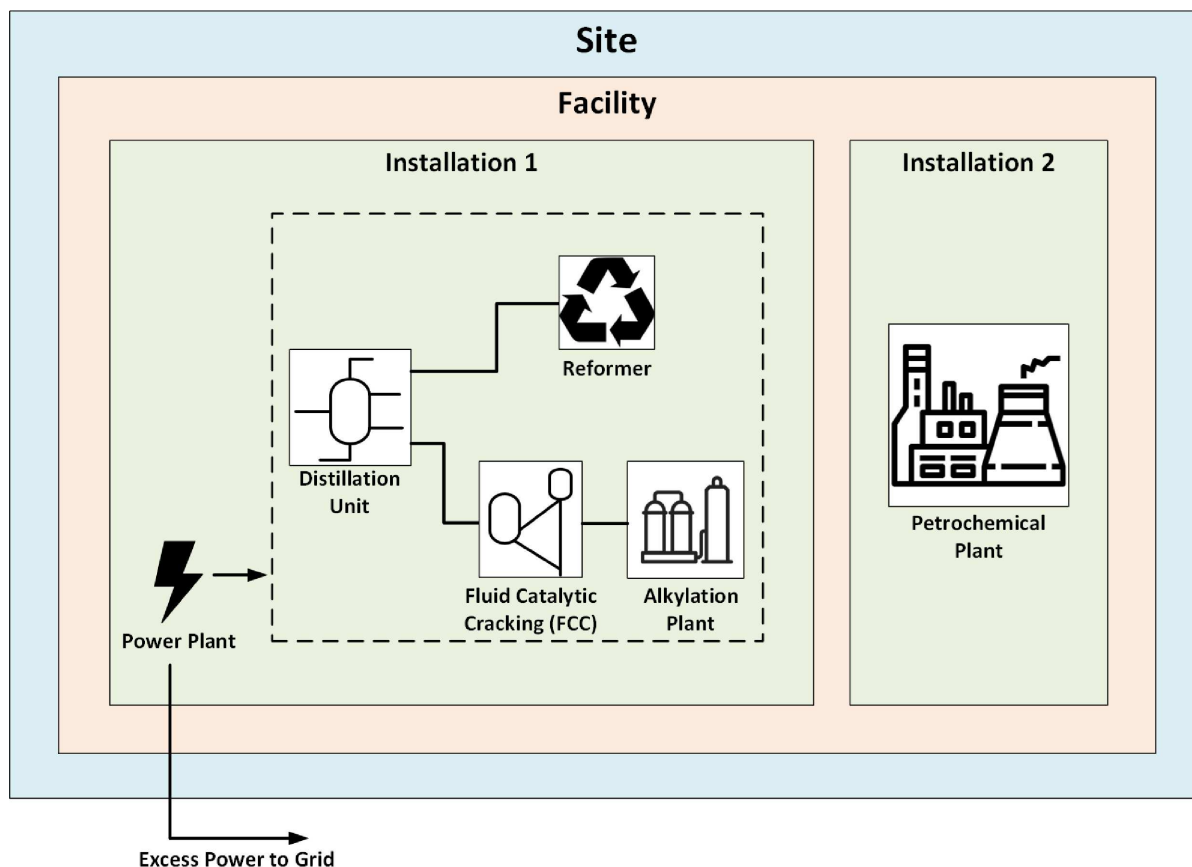
5.3. Refinery and petrochemical site

The example in Figure 5.5 shows a refinery located next to a petrochemical plant. Components of the refinery include a distillation unit that supplies product to the reformer and fluid catalytic cracker, which in turn supplies product to the alkylation plant. In the example, all these technical units are deemed by the competent authority to be strongly technically connected and therefore form one installation. A power plant within the refinery provides power to each of the refining technical units. Although additional power is exported outside the refinery to the grid, the majority of the required power is necessary for the refinery's operation. As such, a strong technical connection exists, and the power plant is also considered part of the same installation.

One of the refinery's activities is providing naphtha to the petrochemical plant. Both the refinery and the plant have the same operator but different processes. The petrochemical plant will further process the naphtha into a set of derivatives that are used downstream to produce rubber, plastics, fibres, resins etc. The naphtha produced by the refinery is also sent to other locations and customers, and the petrochemical plant could potentially use naphtha produced elsewhere. As a result, the technical connection could be considered weak by the competent authority making the assessment. Therefore, the refinery and petrochemical plant should be regarded as separate installations. However, in the example, these installations have the same operator and so are part of one facility. With no other associated facilities, this one facility makes up the site.

Figure 5.5

Example of a refinery and petrochemical site



5.4. Pharmaceutical site

The example in Figure 5.6 is intentionally complex so that multiple concepts can be illustrated.

Facility 1 carries out a combustion process to generate heat and electricity. The heat is provided to the reactors in Facility 2. The whole of Facility 1 is owned by 'Energy Ltd'. It contains three combustion units (Units 1, 2 and 3) and, since each of them are independent boilers with independent stacks, they are deemed to be separate technical units by the competent authority under Article 29(2) of the IED. These units all have a technical connection and so form one installation, Installation 1. The main purpose of this installation is to provide power to the other installations on the site, and excess power is provided to the public grid.

Facility 2 is a pharmaceutical facility owned by 'Pharma Ltd'. This facility contains four different subunits. Unit 4 and Unit 5 are the reactors producing the pharmaceutical product. Unit 6 is a wastewater treatment plant that is functionally connected to the reactors, and Unit 7 stores raw materials. These units are all technically connected and are essential to the functioning of the whole facility. Therefore, they all constitute a single installation, Installation 2.

Facility 3, owned by 'Supply Ltd', conducts a chemical activity that produces biochemical and organic solvents. These are used in Facility 2 but also by other companies outside the site. This facility has two independent installations that do not have a technical connection and that use entirely different chemical processes. Installation 3 is a biochemical reactor that produces a biochemical solvent; a single unit, Unit 8, belongs to this installation. Installation 4 is a chemical reactor (Unit 9) that refines an organic solvent.

The three facilities operated by Energy Ltd, Pharma Ltd and Supply Ltd constitute a single site since these three companies are performing activities with a common purpose and are related in nature, in this case the production of pharmaceuticals.

Although Installation 1 and Installation 2 have a technical connection, they are operated by two different legal entities (Energy Ltd and Pharma Ltd). This means that, although they could be considered as a single installation, they must be reported under the IEPR as separate installations within separate facilities. Similar principles apply to more complex chemical plants carrying out several IED activities.

Figure 5.6

Example of a pharmaceutical site

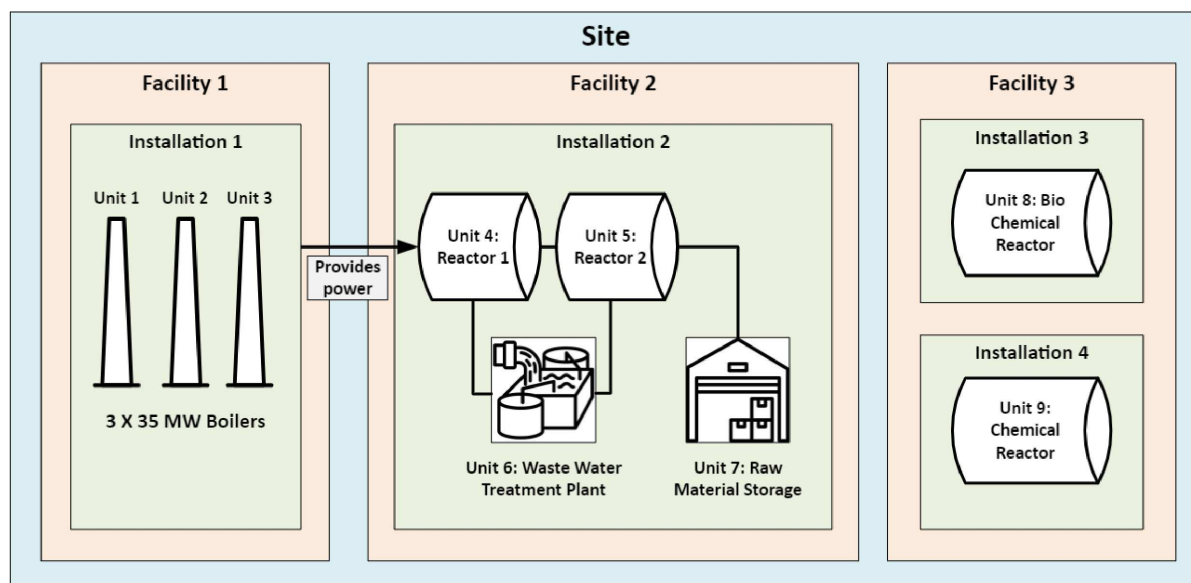
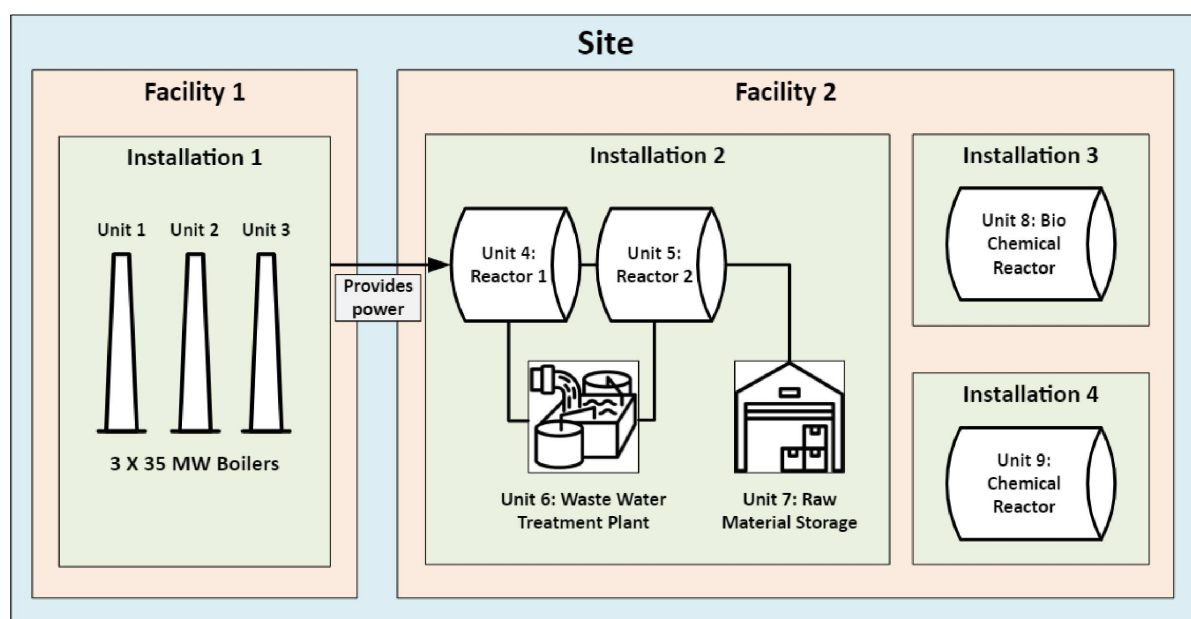


Figure 5.7 illustrates the situation described in Figure 5.6 but after Pharma Ltd purchased and took over Units 8 and 9 from Supply Ltd, combining Facilities 2 and 3 into a single facility on the site.

Figure 5.7

Example of a pharmaceutical site after a change in operator



5.5. Water discharges from multiple installations at the same site

If an independently operated industrial WWTP serves various other facilities on an industrial site, then the WWTP should be separated and reported as another facility and installation. This is for example the case of the IED Activity 6.11, defined as 'Independently operated treatment of wastewater not covered by Directive 91/271/EEC and discharged by an installation covered by Chapter II'. Figure 5.8 illustrates this scenario; the WWTP has a different operator from Installations 1, 3 and 4 and therefore forms one facility with one installation. Therefore, pollutant releases should be reported for the WWTP if the pollutant thresholds specified in Annex II to the IEPR are exceeded. Pollutant transfers should be reported for the other installations if these exceed the thresholds specified in Annex II.

If the independent WWTP on this industrial site is, in an unlikely scenario, combined with an urban WWTP above 100 000 population equivalent (p.e., IEPR Activity 6), it is recommended to report it as a separate installation because it can operate independently. In this case, any wastewater transfers from Installations 1, 3 and 4 to the urban WWTP should be reported as pollutant transfers, provided they exceed the thresholds specified in Annex II to the IEPR.

Figure 5.8

Example of water discharges from multiple installations at the same site treated by an independently operated WWTP

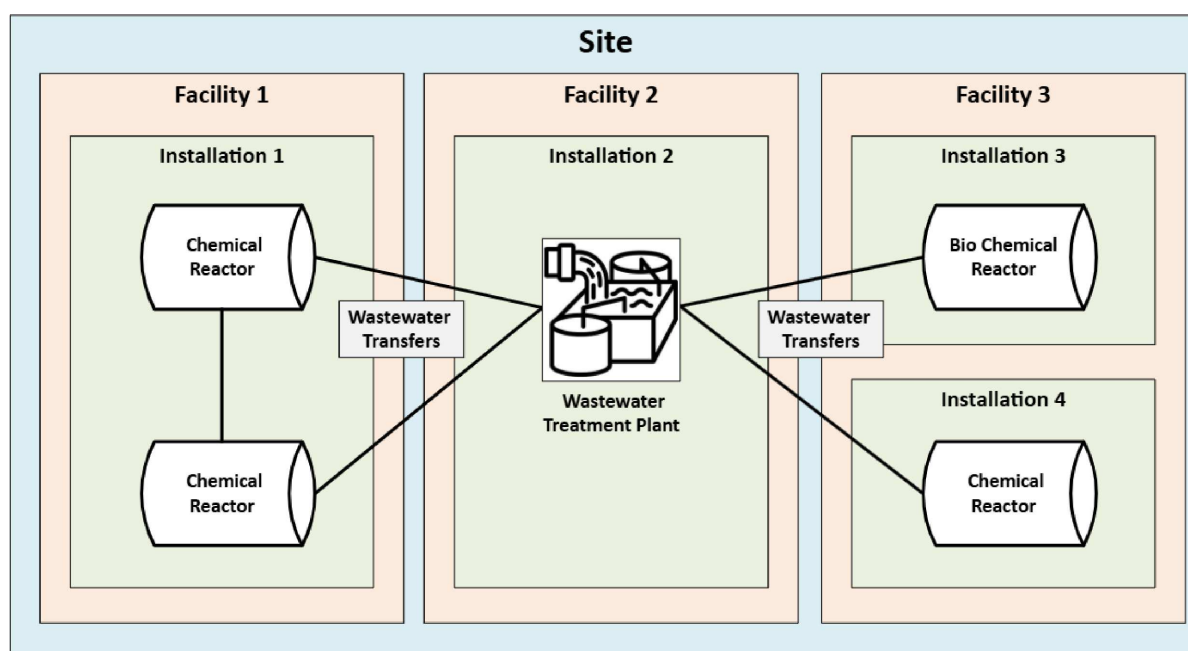


Figure 5.9 shows the case where the WWTP is not independent as it has the same operator as other technical units. For this example, the strength of the technical connection between the two technical units on Installation 2 is deemed strong enough (by the competent authority) to form one installation. However, the technical connection is not deemed strong enough between the chemical reactor, the biochemical reactor and the WWTP to make them all one installation. The wastewater transfers from the chemical reactor on Installation 2 should not be reported as they are considered on-site transfers, provided that the WWTP falls within the scope of IED Activity 5.3(a).

This has also been common practice when reporting Activity 5(c) in the scope of the IEPR's predecessor (the European pollutant release and transfer register (E-PRTR), implemented by Regulation (EC) No 166/2006) when the waste type is as defined in Annex I to Directive 2008/98/EC under headings D8 and D9. On the other hand, if the WWTP does not fall within the scope of IED Activity 5.3(a) or does not fall under the scope of D8 and D9, the transfers of wastewater from Installation 1 and 3 should be reported as pollutant transfers. In either case, Installation 2 should report pollutant releases if these exceed the thresholds specified in Annex II to the IEPR.

Figure 5.9

Example of a WWTP technically connected to a unit on the same installation

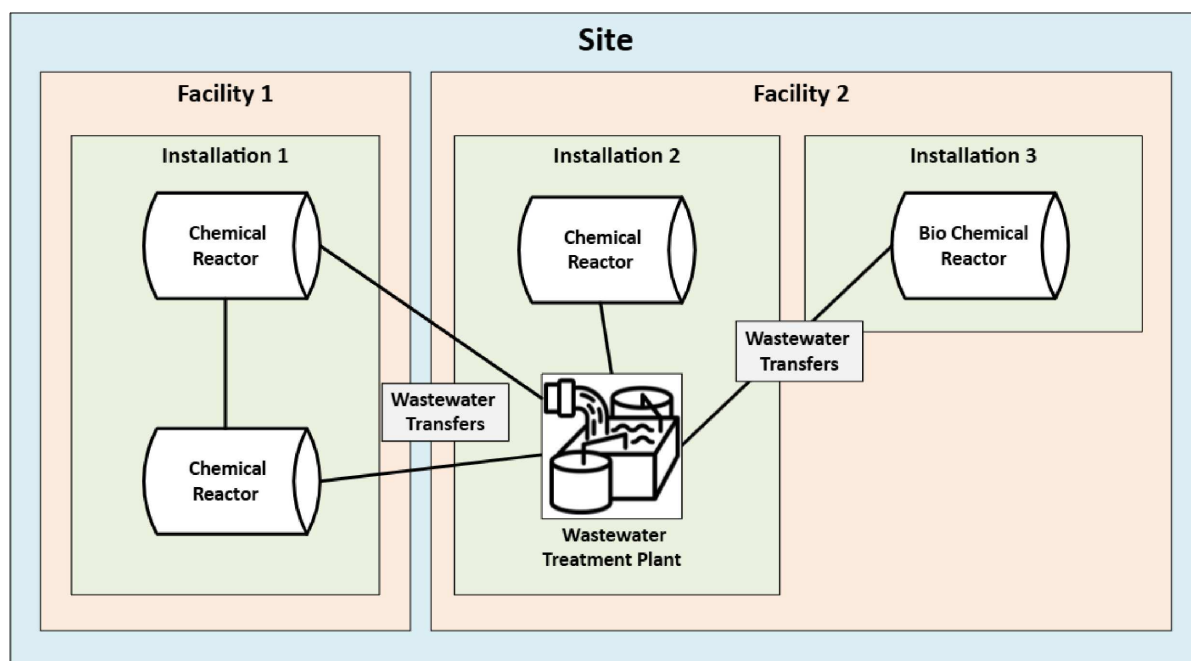
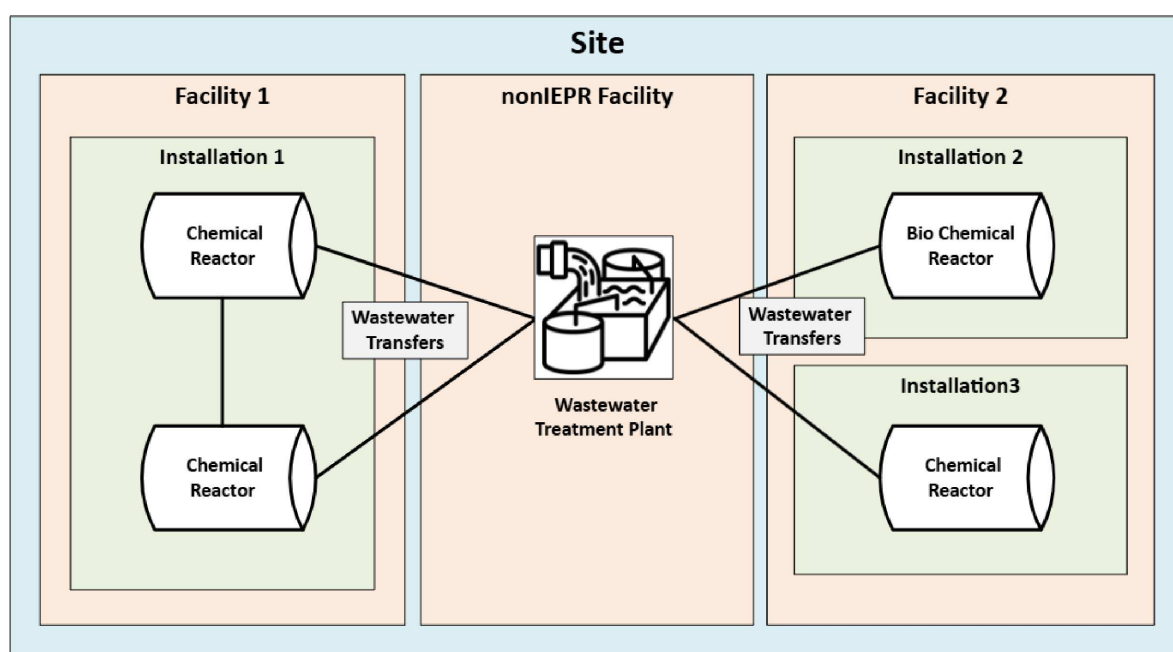


Figure 5.10 presents the scenario where an urban WWTP, serving less than 100 000 population equivalents, is part of the site (since it is functionally connected to other units on the site), but it carries out a non-IED and non-IEPR activity. Installations 1, 2 and 3 would report their wastewater as pollutant transfers. However, the discharge of pollutants to water from the WWTP should not be reported under the IEPR since that WWTP is not in its scope.

Figure 5.10

Example of water discharges from two installations to a non-IED/non-IEPR WWTP operated by an independent operator

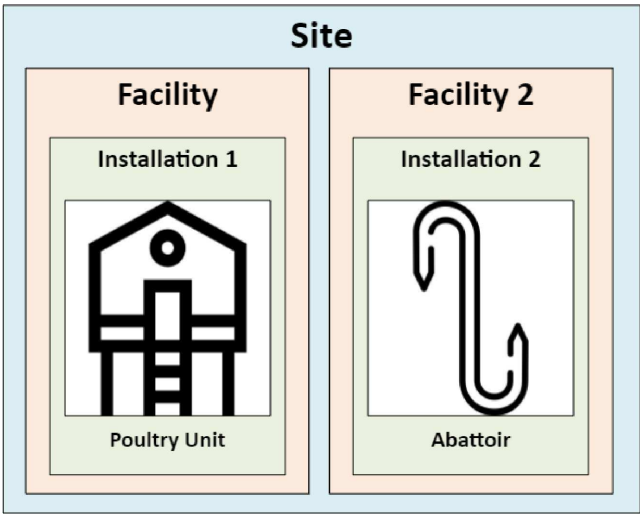


5.6. Installations for the intensive rearing of poultry or pigs and slaughterhouses

Slaughterhouses are often located near intensive farming operations. Figure 5.11 illustrates this scenario, where the slaughterhouse is run by ‘Abattoir Ltd’ and the poultry farm by ‘Poultry Ltd’. Even if these technical units are closely linked, they would still be considered as two separate facilities (Facility 1 and 2) for IEPR reporting because they have different operators.

Figure 5.11

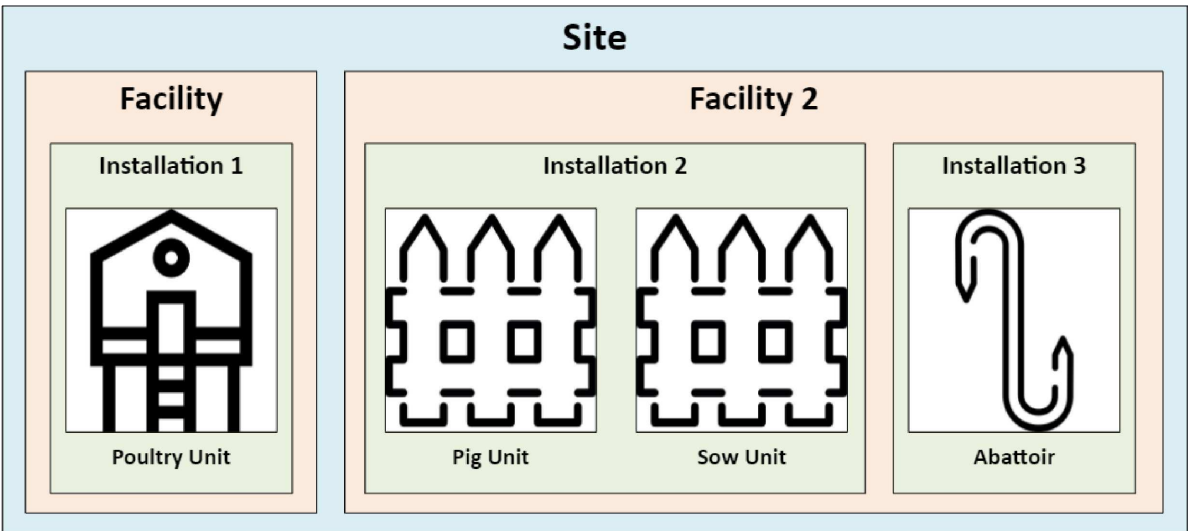
A simple example of an intensive poultry rearing operation and a nearby slaughterhouse



However, if ‘Abattoir Ltd’ were to set up and operate an intensive pig rearing unit and a sow unit adjacent to the slaughterhouse, these units would be considered a single facility, as depicted in Figure 5.12. In this situation, the pig and sow units and the slaughterhouse could form individual installations within the same facility depending on the strength of the technical connection as determined by the competent authority.

Figure 5.12

A more complex example of an industrial livestock rearing and processing site with different operators



5.7. Non-IED sectors and activities

5.7.1. Medium combustion plants

The IEPR, the IED and Directive (EU) 2015/2193 (MCPD) have different reporting requirements. The IEPR requirements apply specifically to larger MCPs with a thermal input of between 20 MW and 50 MW where not covered by Annex I to the IED. These plants, as well as smaller MCPs, are subject to regular reporting requirements under the MCPD, which include actual emissions data, fuel types and quantities used, and capacity, all at an aggregated level.

Under IEPR reporting requirements, the larger MCPs (20-50 MW) forming one MCP installation are only to be reported separately when they are not part of an IED installation. In a site with an installation in the scope of the IEPR but **not** in the scope of the IED, MCPs in the site with a rated thermal input of 20-50 MW are to be reported as a separate installation. See the example in Section 5.7.3 where an opencast mine that is not in the scope of Annex I to the IED has an MCP as its power source.

All individual MCP technical units should be reported as installation parts within the MCP installation. Emissions should be reported at installation level. The number of installations to be reported on an IEPR MCP facility will depend on the technical connections discussed in Section 4.3.2. Several MCPs that together form an installation with over 50 MW rated thermal input would fall under IED Activity 1.1 and should be reported as an installation and not as MCPs.

When reporting to the EU Registry on Industrial Sites, MCPs sharing a common stack are considered an installation part. Under the MCPD, combustion plants are to be aggregated if they are connected to a common stack or 'taking into account technical and economic factors, the waste gases of such medium combustion plants could, in the judgement of the competent authority, be discharged through a common stack' as noted in Article 4 of the MCPD. This approach aligns somewhat with the definition and reporting of LCP installation parts, but the different capacity thresholds that define each activity (i.e. 20-50 MW or above 50 MW thermal input) should be noted. There is no definition of an 'installation' in the MCPD; however, the definition of an operator is the same as in the IEPR. Therefore, the operator's responsibilities, as used in this document to determine the scope of a facility, should be used to define facilities and will therefore define installations at facilities.

Typically, there will be a one-to-one relationship between facility and installation for MCPs for IEPR reporting. However, an MCP can have multiple installation parts for reporting to the EU Registry on Industrial Sites.

5.7.2. Underground mining and related operations, including the extraction of crude oil or gas either onshore or offshore (where not covered by Annex I to the IED)

This chapter of the guidance is for installations that are not covered by IED Activity 3.6.

Typically, there will be a one-to-one relationship between facility and installation for underground mining and related operations based on the operator. A possible exception would be if there is more than one mine, for example for different materials, in close proximity, and these mines are operated by the same company. Since there is no technical connection between the two mines, then this situation could be considered as one facility covering two installations.

For oil and gas operations, there will usually be a one-to-one relationship between facility and installation. One oil and gas field with many wells or platforms operated by the same company should be classified as one installation. This is assuming a technical connection exists where the wells: (i) share infrastructure (e.g. pipelines, processing facilities, storage tanks, flaring systems); (ii) operate as a single unit under the same operator; and (iii) functionally depend on each other (i.e. one well's operation affects another's emissions profile). If there are multiple operators, the one site defined by the oil and gas field would be considered to have multiple facilities. However, if there is no technical connection between different wells, then they could be considered as different installations. As always, it is up to the competent authority to determine the existence of a technical connection.

5.7.3. Opencast mining and quarrying (where not covered by Annex I to the IED and where an effective surface area under extractive operation equals 25 hectares)

This guidance is for installations that are not covered by IED Activity 3.6.

Typically, there will be a one-to-one relationship between facility and installation for mining and other operations. An exception would be when a facility has more than one working face that extracts different types of material or when a facility originally covered one area of exploitation for a particular mineral (e.g. a quarry) and another exploitation area for another mineral. Note that the new IED Activity 3.6 is defined as 'Extraction including on-site treatment operations, such as comminution, size control, beneficiation and upgrading, of the following ores on an industrial scale: bauxite, chromium, cobalt, copper, gold, iron, lead, lithium, manganese, nickel, palladium, platinum, tin, tungsten and zinc'. If competent authorities develop a set of criteria to determine installation scope and boundaries for IED activity 3.6 that can be applicable to underground mining and opencast mining that are not part of Annex I, these criteria may be applied to non-IED mines as well for consistency.

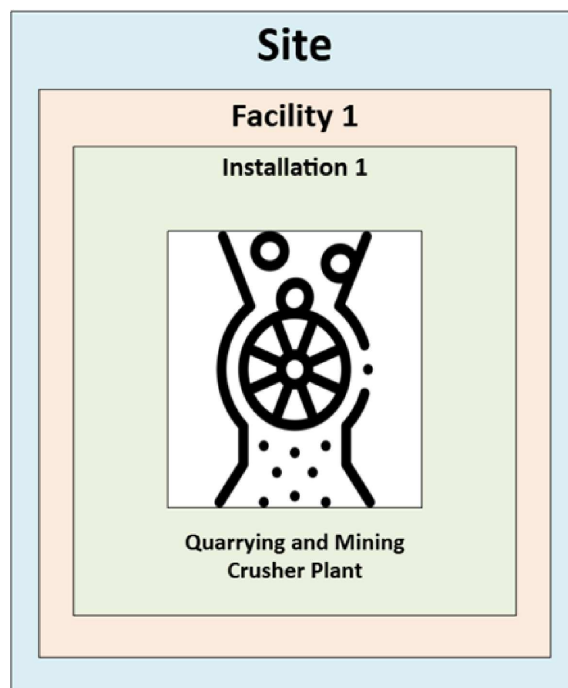
In a typical quarry operation, activities include rock-loosening through drilling and blasting. The quarry is an IEPR installation, and its primary activity is opencast mining and quarrying (where not covered by Annex I to the IED Directive), i.e. it is covered by IEPR Activity 5. On site, there is often a crushing plant, which may be stationary or mobile. A stationary crushing plant would be considered part of the installation, and its emissions would have to be reported (see Figure 5.13).

Additionally, the site may have an energy source, such as a combustion unit, supplying power for various activities on the facility. If this combustion plant qualifies as an IEPR activity (e.g. an MCP), it would be treated as a separate IEPR installation⁽¹⁵⁾ (as illustrated in Figure 5.14).

Obviously, if the power plant was operated by a different operator, it would form a second facility with one installation. If the power plant was larger than 50 MW, then it would be classified as an Activity 1.1 (*Combustion of fuels in installations with a total rated thermal input of 50 MW or more*). Alternatively, if the power plant was less than 20 MW then it would fall outside the scope of the IEPR.

Figure 5.13

A schematic diagram of a typical quarry operation



* The icon in Figure 5.13 is intended solely for illustrative purposes.

⁽¹⁵⁾ Medium combustion plants reporting under the IEPR are defined as 'Activities referred to in Article 2 of Directive (EU) 2015/2193 (where not covered by Annex I to Directive 2010/75/EU). [...] with a rated thermal input of at least 20 MW and below 50 MW'. MCPs are not reportable if they are part of Annex I to the IED. However, if they are an energy source of a non-IED activity (as is the case in Section 5.7.3), they should be reported as such, as long as they have a rated thermal input of 20-50 MW.

The site might also include a non-hazardous waste storage unit for the collection of waste from the site's various activities (see Figure 5.14), but this is not an IEPR activity and therefore not considered a separate installation. However, if the waste unit was for the collection of hazardous waste materials, e.g. waste oils, and had a capacity of 50 tonnes or more, it would fall under IED Activity 5.5 and form a separate installation for the purposes of reporting under the IEPR, unless it fell in the scope of Directive 2006/21/EC on the management of waste from extractive industries.

Figure 5.14

A schematic of a typical quarry with a power plant and a non-hazardous storage unit

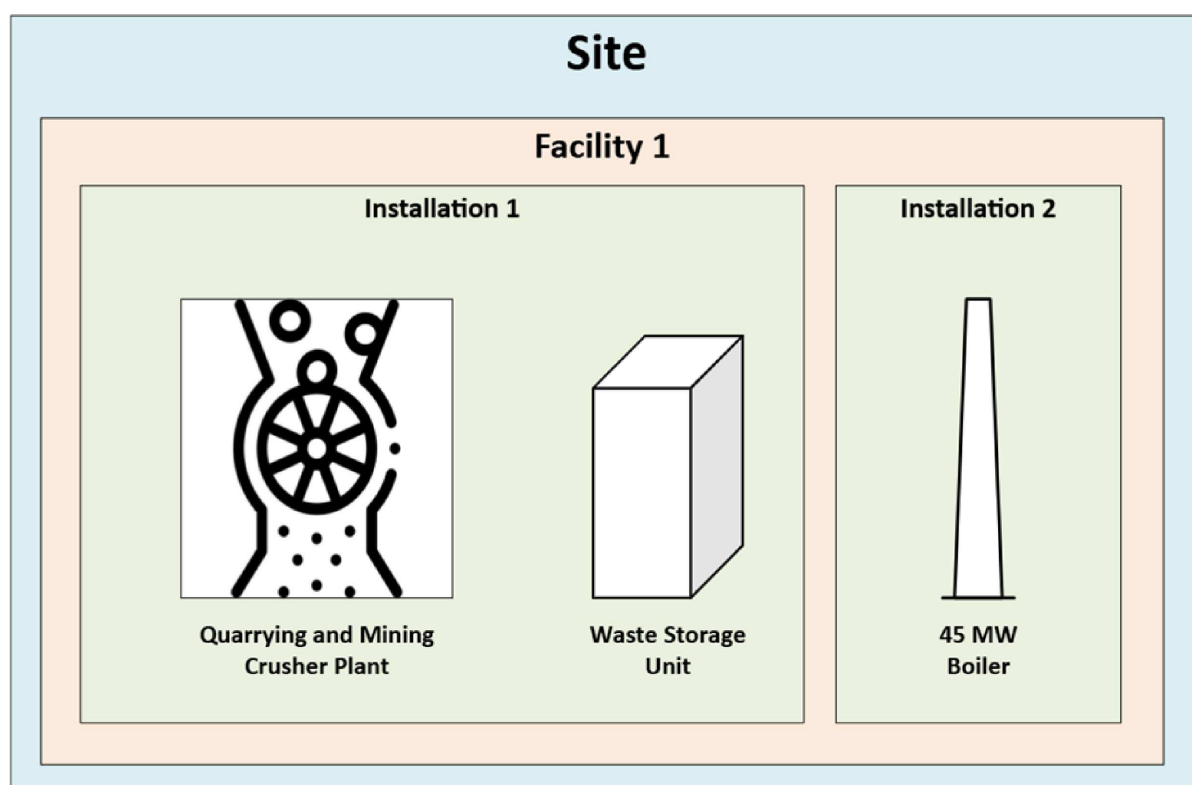
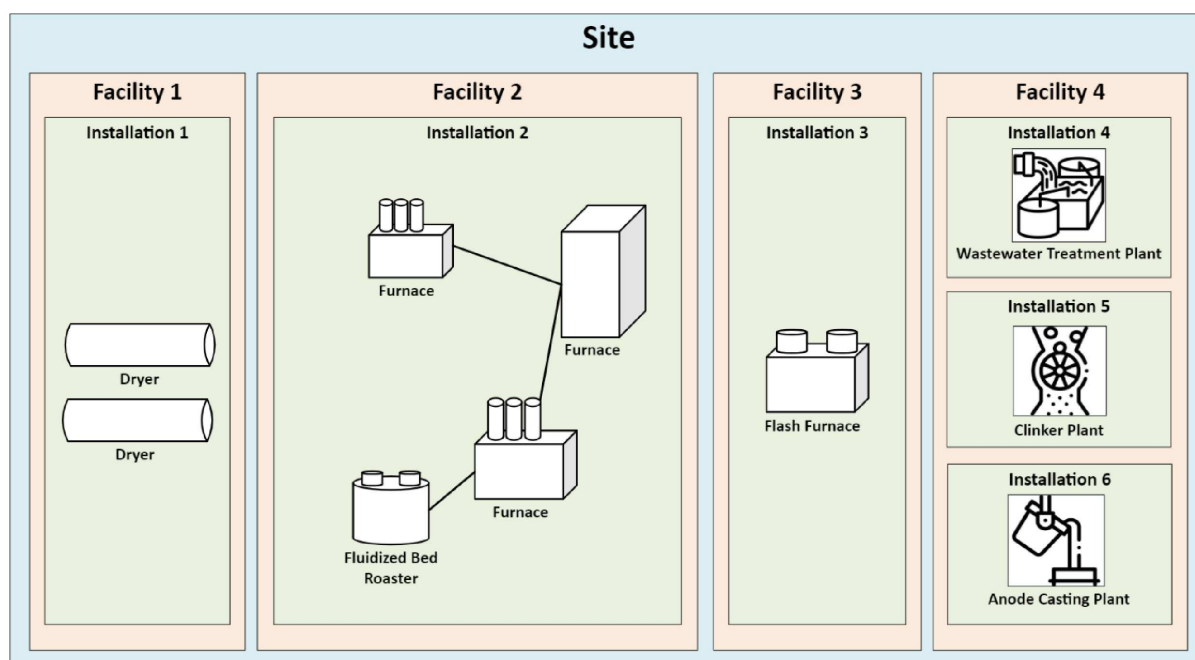


Figure 5.15 illustrates a complex opencast mining operation where there are four different operators and therefore four facilities. Facility 1 consists of two technical units forming one installation, operated by 'Company A'. Facility 2 includes four units that are technically connected, operated by 'Company B'. Facility 3 has one independently operated technical unit, managed by 'Company C'. Facility 4 has three installations (with no technical connection between the units), operated by 'Company D'.

Additionally, various mobile equipment may be used across the site, operating at different facilities at different times. However, as these are mobile units, their emissions should not be included in the reporting for any specific installation.

Figure 5.15

Example of a complex opencast mining operation**5.7.4. Urban wastewater treatment plants (with a capacity of 100 000 population equivalents or more)**

Typically, there will be a one-to-one relationship between facility and installation for urban WWTPs. However, a separate but related waste operation receiving and treating sludge or landfill leachate could be operated by the same company and located on the same facility. In this case, there would be two or more installations on the facility.

Where an operator of an industrial installation owns an urban wastewater plant (or if their wastewater plant was acting as the municipal urban wastewater plant as well), it would be recommended to report this as two different installations. The industrial installation should then report an indirect release (a pollutant transfer) to the urban wastewater plant (as long as the transfer is above the thresholds set out Annex II of the IEPR).

5.7.5. Feed-based aquaculture exceeding an annual production capacity of 500 tonnes

For the definition of facilities, the same principle that was used under the E-PRTR Regulation reporting applies (see Section 4.2). Aquaculture installations normally have several pens, raceways or tanks managed by the same operator. A certain geographical proximity is expected between installations, to be considered the same facility. For example, this could be several cages located in a bay off the same island if they belong to the same operator. Cages in various separate locations along the coast of various small islands of an archipelago that converge in the single location would also be considered as the same facility if they have the same operator.

When defining this activity, the capacity threshold applies to the installation level. Therefore, care should be taken when determining the number of installations within one facility to avoid that the installation unintentionally falls below the capacity threshold set out in Annex I to the IEPR. The definition of 'technical connection' is therefore important (see section 4.1). Technical connection in a marine aquaculture facility means that multiple cages, pens, or units are physically or functionally linked through for example shared infrastructure (feeding, water systems, monitoring) or logistics (for example a central point for feed storage, chemical handling, harvest, and waste removal) and are managed as a single production operation.

Although different aquatic species may pose different environmental concerns, their presence alone is not a valid reason to divide the same facility into multiple installations, since the description of this activity is not species-related. Within the aquaculture activity there may be cases where one company owns a set of pens, but some pens are (temporarily) shared with another company/operator. In this case, the set of pens should be regarded as one facility, based on the ownership of the pens. The owner would be responsible for reporting all the emissions from all operators using its pen(s). Please note

that the use of the term ‘owner’ in this context is an exception to the general usage of the term ‘operator’ throughout this guidance document. In a situation, when a competent authority decides to quantify releases on behalf of the operator, as under Article 6(9) of the IEPR, operators will not need to do it by themselves and to report them to their authorities.

Figure 5.16 presents a scenario where two operators each manage a farm with different numbers of individual fish pens. These pens are typically fastened together, creating a technical connection that forms what is referred to as a farm in the aquaculture industry. In contrast, Figure 5.17 depicts a slightly different scenario where Installation 1 and Installation 2 are owned by the same company but may house fish belonging to other companies. As explained above, these installations belong to a single facility (Facility 1) based on the ownership. Additionally, Figure 5.17 includes a large fish tank operated by a different company, which constitutes a separate facility.

Figure 5.16

Example of a marine fish farm with two operators

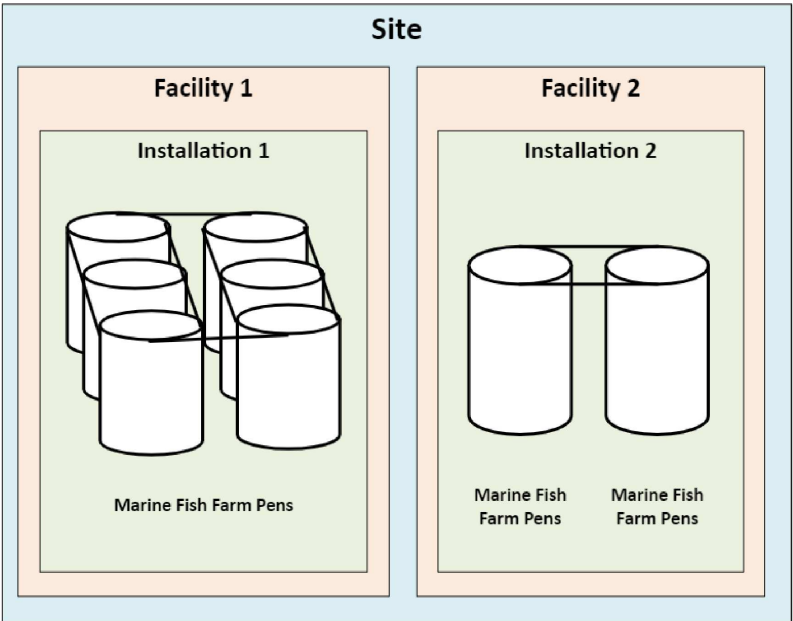
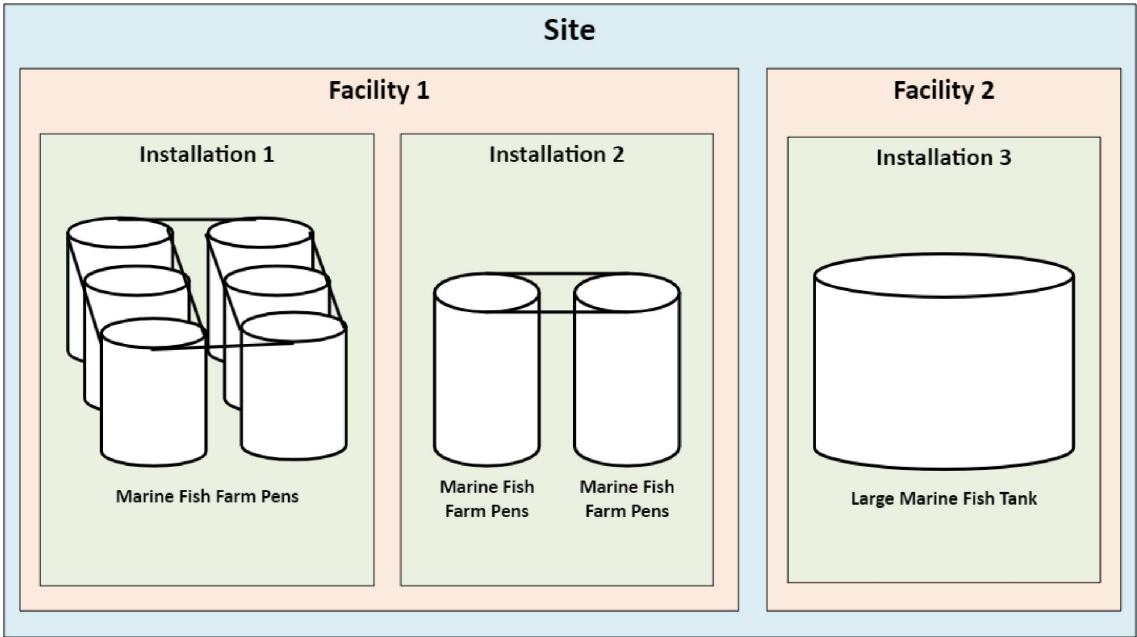


Figure 5.17

Example of a marine fish farm with more than one operator



5.7.6. Installations for building and/or dismantling ships, and for painting or removing paint from ships that have a capacity to accommodate ships 100 m or longer in length

This activity (IEPR Activity 8) covers very different processes (i.e. building, dismantling, painting or removing paint). In most cases, an installation will only carry out one of these processes. This will typically result in a one-to-one relationship between facility and installation for this activity. However, a very large complex owned by the same operator could have different sections dedicated to each of these activities (for example, one section for building ships and another for painting them; both sections for ships 100 m or longer in length). In this case, two installations in the facility should be reported since the environmental impacts are different and the processes are unrelated.

5.7.7. Electrolysis of water for production of hydrogen at industrial scale – installations not in the scope of annex I of the IED

This activity covers installations carrying out electrolysis of water that does not fall under Activity 6.6 of the IED (defined as 'Electrolysis of water for production of hydrogen where the production capacity exceeds 50 tonnes per day'). Competent authorities should use the same criteria to define the installations as with those in the scope of activity 6.6. this is because the activity is the same but with different capacity thresholds.

6. CONCLUSION

This guidance document provides detailed information on how data reporters should identify and report sites, facilities and installations under the IEPR. The document emphasises the hierarchical reporting structure required under the IEPR and the IED, based on the INSPIRE Regulation, which aims to facilitate the integration of spatial and environmental data for policymaking.

The guidance explains the differences and relationships between sites, facilities and installations, including the criteria for identifying technical units, stationary installations and directly associated activities. It also addresses the complexities in determining when multiple installations should be considered part of a single facility, based on technical connections and operational dependencies.

An analysis of the 2022 EU Registry on Industrial Sites dataset reveals that most facilities have a one-to-one relationship with installations, with some differences across Member States.

Complex situations will require a case-by-case consideration and may require consultation with permit writers at the competent authority, with the EEA or with the Commission. The EEA Industry Helpdesk can be contacted at industry.helpdesk@eea.europa.eu.