



Union of Industrial and Employers' Confederations of Europe  
Union des Confédérations de l'Industrie et des Employeurs d'Europe

Mr H. Aichinger  
Head of Unit DG XI/E/1  
BU5 - 2/137  
European commission  
Rue de la Loi, 200  
1047 BRUXELLES

**Industrial Affairs Department**

**25 February 1999**

***DC/SR/ne/13/1***

Dear Mr Aichinger,

**Re: IEF meeting on 18 and 19 February 1999 - UNICE comments**

The UNICE delegation came to the IEF meeting with a constructive attitude and a willingness to come to practical agreement on "Cement and Lime" and "Iron and Steel" BREF documents and to clarify and reach consensus on some of the main issues and notably the preface and introduction to chapter 5 of the BREF documents.

Although our paper and presentation asked for more clarification of the key concepts in a practical and detailed way, our proposals were completely ignored. The BREF preface and introduction to chapter 5 were discussed extensively and reworded but are still unclear. We therefore cannot agree with the proposal finally presented by DG XI on the BREF preface and introduction to chapter 5. This is all the more unfortunate since development of current and new BREFs will encounter the same problems and the same questions will then need to be discussed at the next IEF meeting.

UNICE will consult its Member Federations on how to proceed further after the failure of the IEF meeting and will inform you of the outcome in due course. In the meantime, I would ask you to include all our reservations in the minutes of the IEF meeting as expressed by our representatives.

In conclusion, UNICE calls on the European Commission to review its proposal for the preface and chapter 5 on the basis of comments in our position paper and presentation to the IEF, and is willing to discuss its concerns further provided we are heard on an equal basis as provided for in Article 16.2 of the IPPC Directive.

Yours sincerely,

Daniel Cloquet  
Director

C.C: DG XI/E/1, MR P. WICKS

DG III/B/5, MR K. DOUTLIK AND MS N. VERCRUYSSÉ  
IPTS, MR PER SORUP AND DON LITTEN