

Annex A - Comments on the draft CAK BREF that are consensual within the forum

Comment No.	Chapter No. / section No. (if available)						Chapter title	Page # (in pdf version)	BATC #	Comment description	Rationale	Proposed amendment
1							General		We appreciate the way in which the BREF has been elaborated.	There have been 2 data surveys (questionnaires) where actual data have been provided by the special plants. This information has been put onto BATIS together with the name of the relevant plant. Therefore an open information exchange was possible. Furthermore the elaboration of BAT conclusions could be based on the data from the questionnaires in BATIS.		
2	5	5						261	7	We appreciate the way in which monitoring of emissions (substance, sampling point, monitoring method, standard, minimum monitoring frequency) is dealt with in the Draft BREF CAK.		
3	7						Recommendations	280		We propose to add a recommendation for future work about the redaction of new standards for parameters included in the monitoring BAT and presently not covered by an European or international standard. Thus, future work on the CAK BREF will not lack references, as it was the case up to now, especially when trying to define BAT-AELs.	A stand-alone document on the chlor alkali industry (BREF CAK) is necessary and much more helpful for the permitting industry (and also for industry) than an inclusion in a much bigger document.	A paragraph on standardisation has already been added.