

Overall comment No.	Chapter No. / section No.			Page # (PDF version of final draft)	Comment description	Proposal for modification	Rationale
1	4	2	1	152	Table reference error in 2 places		correct typo
2	5	1	2	216	BAT n°2b addresses the issue of recycled wood used as raw material contaminated with hazardous substances and this is an excellent point. Indeed, waste contaminated with hazardous substances should be used very carefully in order to avoid products made with them to become a sink for pollutants. However 1) some pollutants are missing to our opinion, namely bromine, copper and PCBs 2) limit concentrations for these hazardous substances in the acceptable recycled wood as raw material are missing.	Add Cu in BAT 2 Add Br and PCB in the text in chapter 3.	also these pollutants are likely to be found in waste wood
3	5	1	7	220	The wording of BAT 11 (management of waste and residues) is not completely in compliance with Art 3 of the EU directive 2008/98/EC.	Reword BAT 11 as follows: In order to prevent or, where this is not practicable, to reduce the quantity of waste being sent for disposal, BAT is to adopt and implement a waste management plan as part of the environmental management system (see BAT 1) that, in order of priority, ensures that waste is prevented, prepared for reuse, recycled or otherwise recovered.	The BAT conclusion should be in compliance with the requirements and definitions of the Waste Framework Directive.
4	5	1	8	221	BAT 14: For formaldehyde measurement the monitoring standard is the modified US EPA M316. EN standards should be preferred but in this case there is no EN standard available.	We would appreciate the development of an EN or ISO standard for the measurement of formaldehyde corresponding to the modified US EPA M316.	There is no EN standard available.
5	5	1	8	222	Table "monitoring emissions to water from fibre production" Text "Metals, if relevant" does not define relevance	Modify footnote: Metals, if relevant (e.g. when recovered wood is received)	Clarifies requirements for a costly monitoring procedure.
6	7			238	Recommendations for future work	Modify Recommendations for future work as follows: "Consideration of determining abatement performance of candidate techniques and BAT AELs based on mass of emitted substance per tonne of dried material for the dryer and mass of emitted substance per m3 of produced panel for the press."	The question of reference conditions has been discussed and there are split views regarding this. Danish EPA contacted specialists, who gave the proposal of setting BAT AEL based on flow. Please see the Appendix note from "Referencelaboratoriet" That is not possible now since data on flow was not collected, but it is possible in future work.