



Integrated Permitting: An International Collaboration Effort

What is Integrated Permitting?

Unlike the United States (US) media-specific permitting system, a growing number of countries are using integrated permitting approaches. Integrated permits control all elements of a facility's environmental footprint. Emissions to air, water, and land are comprehensively managed, along with a host of other factors (such as waste generation, raw materials use, energy efficiency, noise, accident prevention, other pollution prevention factors, and risk management). Accounting for an entire facility's environmental impacts, an integrated permit goes beyond simply consolidating applicable media permits – it is intended to promote continually improving performance while ultimately driving the facility to more sustainable outcomes.

The Integrated Permitting International Collaboration Effort

The US Environmental Protection Agency (EPA) is learning about the European Union (EU) integrated permitting system and assessing whether such an approach holds potential for achieving better environmental results, reducing regulatory burdens, or both in the US. The United Kingdom (UK), a leader in integrated permitting, is collaborating with EPA – sharing its experience with integrated permitting and helping EPA explore the possible use of such models in the US. Welcoming this international partnership, EPA intends to share its studies with interested states and a broad group of stakeholders, including state and federal permit writers, policy experts, and representatives from academia, non-governmental organizations, and industry. An October 2007 workshop is planned for sharing information and exploring individual ideas regarding the potential use of integrated approaches in the US.

UK and EU Experience

The UK has been using an integrated permitting system for almost two decades, since the 1990 Integrated Pollution Control (IPC) Act. In 1996, building on the UK experience, the EU adopted the Integrated Pollution Prevention and Control (IPPC) directive, establishing rules for incorporating integrated permitting systems into regulatory frameworks. EU member states are currently implementing IPPC. The directive demands that permit conditions achieve protection for the environment as a whole and calls for facilities to comprehensively account for all environmental impacts. The IPPC covers 32 specific business sectors, including energy, metals, minerals, chemicals, waste management, pulp and paper, food and drink, intensive agriculture, tanning, textiles, glass, and ceramics.

The UK began its phase-in of IPPC in 2000 with the implementation of the Pollution Prevention and Control Act (PPC) (replacing IPC). The PPC is outcome-focused, expands permitting considerations (e.g., adding energy use, site restoration), and includes additional sectors (e.g., waste management, paper, food, and intensive agriculture). The UK also uses a risk-screening methodology based on the complexity, emissions, location, and performance of a facility to target facilities that present the greatest environmental risk. The UK issued its first PPC permit in March 2001 and anticipates issuing approximately 3500 by 2007 (the IPPC implementation deadline for EU member states is October 2007).

Integrated Permitting Network

EPA is sharing its studies in the form of a draft report with a network of international, federal, and state regulators, including permit-writers and policy and program experts from EPA's regional and national program offices and state environmental agencies and other non-regulatory interest groups, such as academics and NGOs. More specifically, the draft report includes (1) descriptions of the UK integrated permitting process and tools, operational and organizational approaches, and strategies; (2) areas of commonality and key differences between UK and US permitting practices; (3) a summary of the US experimental permitting experience; and (4) general findings about possible advantages of and/or applications for testing integrated permitting in the US. The EPA National Center for Environmental Innovation, in cooperation with the Woodrow Wilson International Center for Scholars, is hosting a workshop on October 25, 2007, to convene a select group of individuals from academia, government, industry, and non-governmental organizations to share the report findings and to discuss the implications and opportunities associated with them. Ideas and perspectives raised at the workshop will be reflected in the final report, scheduled for release in late 2007.

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