4.4 Minister's letter of June 1995 concerning odour

DIRECTORATE-GENERAL FOR THE ENVIRONMENT
Directorate for Air and Energy
Air Quality and Acidification

The board of Provincial Executives
and the board of Municipal
Executives

30 June 1995 LE/LV/AJS95.16B MBL276.95004

Subject:
The result of the general consultation between the Minister of Housing, Spatial Planning and the Environment and the standing committees of the Ministry of Housing, Spatial Planning and the Environment, the Ministry of Economic Affairs and the Ministry of Agriculture, Nature and Fisheries concerning an odour policy[1]

Dear Boards,

On 29 March last I had a consultation with the standing committees of the Ministry of Housing, Spatial Planning and the Environment, the Ministry of Economic Affairs and the Ministry of Agriculture, Nature and Fisheries of the Lower House of the Estates General concerning the Revised Odour Policy Memo. Before this consultation, I sent letters on the Revised Memo to the chairpersons of these committees.

These letters of 31 January and 21 March last expressed intentions to modify the Revised Memo and were also the subject of discussion during the general consultation of 29 March last. These modifications were introduced after consultation with the relevant parties, companies and licensing authorities and were aligned with my colleagues of the Ministry of Economic Affairs and the Ministry of Agriculture, Nature and Fisheries.

I hereby wish to inform you about the odour policy as formulated in the Revised Odour Policy Memo in connection with the modifications thereof in the said letters of 31 January and 21 March last and approved by the Lower House. This letter may be looked upon as a summary of the key policy components of the odour policy as agreed by the Lower House. The letter focuses attention on the following points:

I general odour policy
II scope of policy
III consequences of implementation of the policy
IV permits that should be modified
V follow-up activities

1 Appendices: list of category I industries.
The NeR Advisory Group points out that the division into categories as done in this letter is no longer current.

I General odour policy

a Core of odour policy

Odour is smell regarded as a nuisance. In the Netherlands over 20% of the population is hindered by odour. In the National Environmental Policy Plan for 1989 (NMP) the goal for odour nuisance over the year 2000 is specified for a maximum of 750,000 dwellings hindered by odours, which corresponds to 12% of those hindered by odours; the goal for the year 2010 is to have no severe nuisance at all.

The Parliament agreed to the following odour policy on 29 March last:

The basic principle used is prevention of (new) odour nuisance. Derived from this, the following policy line can be given:
- if *there is no nuisance*, *no measures will be required*;
- if *there is nuisance*, *measures* will be taken on the basis of the *ALARA* principle;
- the *degree of nuisance* may be determined by means of a subjective assessment study, nuisance questionnaire, complaint registration, etc. With respect to category 1 companies, the nuisance levels are dealt with in the industry-wide study;
- The *degree of nuisance* that is still acceptable is determined by the *competent authorities.*

In the Netherlands Emission Guidelines for Air (NeR) sets of measures will be established for a number of industries. These guidelines are based on industry-wide studies. The premise is that in most cases the measures will lead to an acceptable nuisance level. The competent administrative body must determine whether the measures will lead to an acceptable nuisance level and may therefore depart from the NeR on duly stated grounds.

The odour concentration* formerly used in the odour policy of 10 ge/m^3 as 98th percentile is, for existing installations, a factor for assessing the different scenarios which are used to determine the set of measures on the basis of the ALARA principle.

With respect to spatial developments, both new establishments and extensions of environmentally unfriendly or environmentally sensitive activities, the premise also applies that new nuisance must be avoided. The premise is therefore that a new residential area or other type of sensitive use is planned at such a distance from odour sources, and vice a versa, that no or at most an acceptable degree of nuisance may be expected. Indications for distances to be maintained can be derived, for instance, from the publication entitled Operations and Environmental Zoning (*Bedrijven en milieuzonering*) (1992, VNG publishers), the brochure 'Cattle Farming and Nuisance Act' (*Veehouderij and hinderwet*) (1985) and data from the permit procedure of a company causing odour.

In the issuing of permits for new installations, the extension of installations or in the case of revision permits, the premise of the Environmental Protection Act is that Environmental Protection Act Article 8.11 will be applied ('Best Available Control Technology'). Efforts are directed at preventing (new) nuisance. If this is not (fully) possible, for example, due to spatial or economic circumstances, it will be determined at the local level whether other solutions are feasible and a weighing up will subsequently take place.

b Detailing

In order to be able to achieve the goals, measures will be taken on the basis of the formulated policy at those parties causing odour for the purpose of preventing emissions or restricting them as much as possible. Although the implementation of measures at the source is a priority, odour nuisance may also be reduced or prevented through spatial separation of (potential) odour sources and (potential) parties experiencing odour nuisance. That is why within the contours of the nuisance level (expressed in ge/m^3), if present, it should be acceptable to have a distinct reticence with respect to spatial developments, unless a different kind of deliberation is made through a thorough analysis of the local problems. In the case of spatial developments, it is useful to be able to make a deliberation by using a contour as much as possible, which can only be used if the relation to nuisance is known. It is, however, preferred to prevent or restrict odour emissions.

Generic

The measures to be taken at the sources will be formulated in generic terms, where possible. This will be done in guidelines and in general administrative orders pursuant to Environmental Protection Act Article 8.40. Here it concerns, among other things, the distance guideline for cattle farms contained in the brochure 'Cattle Farming and Nuisance Act' (1985), the Amended Guideline concerning Odour Nuisance Caused by Car Respraying Firms (publication 91-03), the Decision concerning Bread Bakeries and Confectioneries, Environmental Protection (Stb. 87, 470), the Decision concerning Butcher's Shops, Environmental Protection (Stb. 87, 471) and the Decision concerning the Catering Industry, Environmental Protection (Stb. 92, 298).

Industry-wide level ('category 1 companies')

In those cases in which (still) no guideline or general administrative order exists and where there is nevertheless nuisance, it will be determined possibly through an industry-wide study which measures on the basis of the ALARA principle may be taken and which effect they will have. The results of this study will, after consultation with the industry in question, be

* The odour concentration in this letter is expressed in Dutch odour units per m^3, as was usual in Dutch daily practice up to the year 2001. The relation with European odour units is fixed: 2 ge/m^3 = 1 ou_E/m^3. Note by InfoMil, 2001.

incorporated in a special regulation of the Dutch Emission Guidelines for Air (NeR). It will serve as a guideline for licensing, from which moreover a departure may be made on duly stated grounds if this is necessary or feasible to achieve an acceptable nuisance level. The so-called category 1 approach relates to sixteen branches of industry which are named in Appendix 1 to this letter.*

Individual companies('category 2/3 companies')
For companies / industrial estates where this approach is impossible, an individual approach is recommended (category 2: individual companies not falling under an industry-wide study and category 3: complex industrial estates). A company will have to indicate itself in the context of the permit procedure which measures are possible and which effects they will have. On the basis of these data, the competent administrative body will make the deliberation on the basis of the ALARA principle (laid down in Environmental Protection Act Article 8.11, paragraph 3). In this it is established that specifications are attached to a permit which are necessary to protect the environment. If by attaching specifications to a permit disadvantageous consequences cannot be avoided, specifications are attached to the permit which offer the largest protection against these consequences, unless this reasonably cannot be required.

c Clarification of odour policy

Distinction between nuisance and severe nuisance
On the national level a distinction is made between nuisance and severe nuisance; this is also demonstrated in the goals of the National Environmental Plan (NMP) with respect to the theme of disturbance. In practice, however, this distinction is difficult to use and hard to explain in individual situations. That is why

> *in the implementation of the odour policy the distinction between nuisance and severe nuisance is no longer used.*

Instead of that, the competent authorities may establish the level at which nuisance is judged to be acceptable. The manner in which this is established is left to the competent authority. If an industry-wide study is available, the nuisance level is established partly on the basis of the information contained in the study; in an industry-wide study account is taken of, for example, the characteristic type of odour and attention is given to the relationship between odour concentration and odour nuisance.

Odour nuisance classification
If no industry-wide study is available, the nuisance level will have to be determined in a different way. At this moment representatives of industry and officials of the Interprovincial Consultation (IPO) and the Association of Dutch Municipalities (VNG) and the Directorate General for Environmental Protection (DGM) are preparing a system and/or guideline on how the nuisance level can be established. This guideline must answer the question which methods for determining nuisance and/or measuring odour concentrations or combinations thereof can be used in a particular situation. Especially when no industry-wide study is available, this guideline may provide help in choosing the must suitable method(s). It will be recommended to incorporate this system in the Netherlands Emission Guidelines for Air (NeR). It will contribute towards a uniform approach to companies and offers licensing authorities a handle for determining a nuisance level that is judged to be acceptable. If in individual situations the above-mentioned system leads to unfairness, the licensing authorities may depart from it on duly stated grounds. The system will be ready in the summer of 1995.

Nuisance levels and taking of measures
The premise of the policy is prevention or the highest possible limitation of nuisance. The competent authority determines whether nuisance exists. In most cases the history of an existing source will give an important indication for that. In consultation with the company, measures are specified in accordance with the ALARA principle to eliminate the nuisance or to limit it as much as possible. Aspects that may play a role in this process are the company's history in the area where it is located, the nature and valuation of the odour, the complaints procedure and other available information on the nuisance and (possible) emissions, the technical and financial consequences of possible measures, the consequences for employment, etc. The result of this extensive process of deliberation will be the so-called acceptable nuisance level.
In the case of category 1 companies this deliberation is made primarily at industry level. Here the premise is that in most cases the measures will lead to an acceptable nuisance level. The competent authority must determine whether the measures do indeed lead to an acceptable nuisance level and may therefore depart from the NeR on duly stated grounds.
When issuing permits, the competent authorities may specify in the permit the measures (as a means specification) and/or may include the odour emissions (as a target specification); the specification must always be sufficiently enforceable, however.

National goals
The national odour goals remain unchanged; the premise remains prevention or reduction of nuisance, which implies that severe nuisance is also prevented. In accordance with this premise, the competent authorities will strive to prevent (new) nuisance.

This means that achieving the goals of National Environmental Plan (NMP) for odour is partly dependent on the efforts and deliberations made at the local level.

Upper limit
In general there is severe nuisance above 10 ge/m³ as 98th percentile. However, from recently available information it appears that not in all cases severe nuisance need occur at an odour concentration above 10 ge/m³ as 98th percentile. Various studies on the relation between odour nuisance and odour concentration have also shown that severe nuisance may also occur at concentrations from approximately 2–3 ge/m³ as 98th percentile. Given the above,

> the value of *10 ge/m³ as 98th percentile no longer has the 'status' of upper limit.*

For existing installations, 10 ge/m³ as 98th percentile is a factor for assessing the different scenarios used to determine the set of measures on the basis of the ALARA principle.

There is therefore no uniform, national quantitative upper limit. In the past a quantitative approach was used with odour concentration standards used as a premise, but after the current modifications were introduced more emphasis was placed on a qualitative approach in which prevention or the highest possible limitation of nuisance and application of the ALARA principle were the determining factors. Odour concentrations will be used especially as a mathematical tool in determining the measures.

New installations
The Revised Odour Policy Memo indicates that in the issuing of permits for both new and existing installations the ALARA principle is used as a premise. It also states that for new installations generally a value of 1 ge/m³ as 99.5th percentile will have to be satisfied. However, there is no general standard for new installations. Since in practice this has created a confusion, it has been decided to

> *annul* the phrase concerning 1 ge/m³ as 99.5th percentile as a generally achievable value.

What is important is that the starting point is to try *to prevent the creation of new nuisance*. To that end, the competent authorities will prescribe that protection level for new installations or operational developments in existing installations which is possible with the application of Environmental Protection Act Article 8.11, paragraph 3: use of Best Available Control Technology. If this is insufficient to prevent nuisance, the competent authorities must examine whether there are other possibilities to prevent the creation of nuisance. For example, the choice of location can be taken into account in the preliminary consultation regarding the permit application: the location of the installation in relation to the environmentally sensitive object (in particular house building) as well as the possibility for a different location within the industrial estate.

Alternative techniques with a higher environmental efficiency may also be demanded. If, in this way, new nuisance cannot be (entirely) avoided, the competent authorities must weigh up the new nuisance against the interests involved in the establishment of the new installation and the possible extension of house building.

d Costs of odour policy

When the Revised Odour Policy Memo was drawn up, an inventory was taken of specific operational effects including investment costs. The odour policy was changed with respect to the above-mentioned components in relation to the Revised Memo. This also has consequences for the operational effects.

That is why for those industries for which industry-wide studies are available or currently being performed, the so-called operational effects test (BET) as well as the environmental test and implementability and enforceability test will be part of these studies. This means that, for instance, income and expenditure, both economic ones and in terms of environmental efficiency, must be taken into account in determining the standard sets of measures for each branch of industry. The number of installations covered by the industry-wide studies is estimated to be well over 80% of the total odour producing companies. On the basis of the resulting data, a total estimate will be made of the operational effects on the industrial sector as a whole.

To that end, it is important that the industry-wide studies are completed in the short term. Agreements on that and on how it will be done have been made with the industries, IPO and VNG: on 1 January 1996, if possible earlier, all industry-wide studies including the associated measures will be complete.

II Scope of policy

The modifications made in the letter of 21 March last do not have consequences for the existing guidelines and general administrative orders referred to in Environmental Protection Act Article 8.40. This concerns the distance guideline for cattle farming (1985), the guideline for car respraying firms, the Decision concerning Bread Bakeries or Confectioneries, Environmental Protection (Stb. 87, 470), the Decision concerning Butcher's Shops, Environmental Protection (Stb. 87, 471) and the Decision concerning the Catering Industry, Environmental Protection (Stb. 92, 298). In the general consultation with the Lower House it was stated that the regime of the existing general administrative orders and guidelines will be maintained.

Agriculture

In assessing a permit application for a cattle farm, odour nuisance plays an important role. To achieve the required clarity and uniformity with respect to that, the so-called odour guideline has been drawn up. This guideline was first published in the first edition of the brochure 'Cattle Farming and Nuisance Act' 1976. In the second edition of this brochure, the guideline was once again included with a more extensive list of conversion factors. In applying the guideline in practice it became apparent that odour nuisance for the surrounding area is generally sufficiently prevented. In the context of updating the conversion factors it is currently being investigated what the impact is of emission-abating techniques (e.g. emission-low stable systems) on the odour emission and with that on the distance guideline. Updating will also take place with respect to animal species still lacking in the conversion factors. I expect that the first results of this will be known in early 1996.

Traffic

The contribution of traffic to the total odour nuisance in the Netherlands is considerable: 35% of those perceiving odours indicate that traffic is the source of nuisance. Research has shown that this nuisance is mostly experienced in the major cities and primarily on the streets. Exposure data in the form of odour concentrations are still unavailable. Research on that has been started. It is expected to be completed in the course of 1995. It will then be considered whether follow-up research as a result of knowledge gaps will be required. In the second half of 1996 it will be known whether further policy formulation regarding odour caused by traffic will be required: the formulation of a so-called policy standpoint.

Households

Odour from households is primarily caused by wood-burning stoves, hearths, barbecues, compost vessels and separate storage of household waste. There is an insufficient insight into the extent to which these sources contribute towards odour nuisance.
Regarding wood-burning stoves, specific measures are being prepared partly in the context of reducing the emission of PAHs (polycyclic aromatic hydrocarbons). This includes a type inspection regulation for wood-burning stoves, which is expected to come into effect in 1996. In August 1994, the VNG sent a letter to municipalities concerning the approach to nuisance caused by hearths and wood-burning stoves.

Industry target group policy

The measures to be established in the context of the implementation of the odour policy remain effective for those industries for which a covenant has been concluded in the framework of the target group policy. The covenants will be implemented by means of company environmental plans which the companies will draw up once every four years. The execution of the odour policy as described in this letter will take place for these companies in the context of the drawing up and assessment of the company environmental plans.
As regards the method of translating this to the permits, the agreements made in the context of the industry target group policy will be maintained. This means that if a company has an approved company environmental plan, it will serve as the starting point for the issuing of permits.

In the case of industries for which manuals have been or will be prepared as a tool for drawing up company environmental plans (for the time being this concerns the printing industry, the metal and electrical industry, the textile and carpet industry and the meat industry) the working out of the odour policy will be included integrally in the manual.

III Consequences for practical implementation

Industry-wide studies

The odour policy described above has consequences for the implementation of the odour policy. Agreements have been made concerning the time of completion of the studies: on 1 January 1996 (if possible earlier) all industry-wide studies, including the associated sets of measures, must be completed and included in the NeR. It is in the interest of all parties that these studies are completed as quickly as possible. The industries and the competent authorities both require insight into the nuisance level and/or the set of measures to be specified in the NeR. To achieve completion on 1 January 1996, a separate project organisation has been set up in which industry representatives and provincial and municipal officials participate and also officials from the Ministry of Agriculture, Nature and Fisheries and the Ministry of Economic Affairs; the Ministry of Housing, Spatial Planning and the Environment / Directorate General for Environmental Protection takes the lead in this. The NeR staff office is also involved in this.

The final proposal for detailing the NeR will be sent to the Advisory Group for Emission Guidelines (ARE) in preparation of definitive inclusion in the NeR. All parties are represented in the ARE, including industry. The ARE is a preparatory body for the Committee on Emissions to Air (CEL), which functions at the administrative level; the final determination will take place in the CEL. The CEL and ARE have been mandated by the DUIV Consultation (administrative consultation with representatives of DGM, Unie van Waterschappen, IPO, VNG) to take decisions on matters relating to the NeR.

Nuisance classification
As has been indicated in this letter, in the summer of this year a system and/or guideline will be drawn up which will not determine the level of nuisance but the way in which it can be established. This system constitutes a guideline for the licensing authorities and will be laid down as such in the NeR. The final result will also find its way into the NeR through the ARE/CEL procedure.

Licensing policy
To prevent that permits have to be revised or amended, I request you for the so-called category 1 companies (see Appendix 1) to be reticent until 1 January 1996 about starting procedures for changing or revising those parts of the permits which contain or will contain specific requirements with respect to odour.

However, situations may occur that could make it necessary or advisable either for the licensing authority or the permit applicant that a permit is issued before 1 January 1996. In those cases in which a company causes odour nuisance a specification regarding prevention or restriction of the nuisance will have to be attached to the permit on the basis of the current insights. If there are reasons for assuming that the specification will have to be modified after the completion of a relevant industry-wide study, it will be necessary to apply the odour specification merely for a specific period of time through application of Environmental Protection Act Article 8.16, under b. This period may be the period until the said study becomes available and on this basis the odour nuisance and the measures to be taken can be determined once more. Furthermore, if the specification is not linked to a term the competent authorities will nevertheless have to update the odour specification pursuant to Environmental Protection Act Article 8.22 when there is cause for this on the basis of the industry-wide study. The phase in which the consultation between the government and industry concerning the industry-wide study is at that moment may also have an influence on the actions taken in the above situations.

IV Permits eligible for modification

Existing permits
The licensing authority has the power to determine whether specifications in existing permits should be revised as a result of new insights, facts or circumstances. If this situation occurs, the licensing authority may decide in the course of time to change the permit and, on conditions, not to take actions directed at enforcing compliance with the current permit specifications. A copy of this decision will be sent to the Environmental Health Inspector.

Questions have been asked of me concerning existing permits in which the value of 1 ge/m^3 as 98th percentile (or as 99.5th percentile) has been included as a target specification. If a target specification (of 1 ge/m^3 as 98th percentile or as 99.5th percentile) has been satisfied or in the case of application of the ALARA principle it can be satisfied in the future, there is no reason to modify the permit, nor does it have to be modified to a nuisance level determined in the industry-wide study which is higher than 1 ge/m^3.
There are, however, situations in which after application of the ALARA principle the 1 ge/m^3 as 98th percentile or 99.5th percentile established in the permit is not complied with or the acceptable nuisance level is above 1 ge/m^3. In such a situation, a company may request the permit to be changed. For category 1 companies the basis will be, if present, the odour concentration standard which forms the starting point for the set of measures specified in a special regulation of the NeR on the basis of the industry-wide study.

I wish to emphasise that there are exceptions to the situation described above. In general, since the coming into force of the Contribution Regulation concerning Implementation of Municipal Environmental Policy (*Bijdrageregeling Uitvoering Gemeentelijk Milieubeleid*, BUGM), permits in the Netherlands have reached such a level that the number of permits which contain a target specification which is infeasible or unnecessary are, according to my estimate, very small.

Two situations can, roughly speaking, occur in practice which could lead to modification of a permit:

Situation a:
A competent authority determines that at a higher odour concentration value than assumed in the permit specification there is no nuisance at all. The permit holder then does not have to take further measures in order to comply with the specification in question; the permit is adjusted upon request for change or in the case of revision. In the meantime, reticence can be shown with respect to actions aimed at compliance with the permit. The competent authority informs the Regional Environmental Health Inspector as to why it is justified to take no action to enforce the standard specified in the permit.

Situation b:
A competent authority determines that a nuisance exists but that application of the ALARA principle will not lead to achieving the odour concentration value specified in the permit. In consultation with the party involved, the competent authority determines which measures must still be taken and when they must be realised. In the case of a request for change or revision, the permit can be modified. In the meantime, reticence can be shown with respect to actions aimed at compliance with the permit. The competent authority informs the Regional Environmental Health Inspector

why it is justified that no action is taken to enforce the standard specified in the permit and also concerning the arrangements made.

Current appeal procedures
The Council of State is an independent court that gives judgements in disputes concerning environmental permits. In assessing the disputes, the permit in question is tested to see if was drawn up correctly, i.e. whether account was taken of the legal requirements and whether the principles of proper administration were complied with. Anyone who feels that a permit does damage to his interests may appeal to the Council of State: the company for which the permit is intended, persons living in the vicinity, environmental organisations. Furthermore, legal advisers such as the Regional Environmental Health Inspector may also submit an appeal.

It may be assumed that in the current appeal procedures especially the standard of 1 ge/m^3 as 98th percentile and the standard of 1 ge/m^3 as 99.5th percentile are under discussion. In principle, the court in judging disputes relating to that odour concentration value will base itself on the policy which applied at the moment the permit was issued. If the Council of State judges that the reasons given for that particular odour concentration in that specific situation is insufficient, the competent authority will have to take a new decision. In doing so, the current odour policy as laid down in this letter will generally be taken into account. The main thing is that it will always be a local deliberation, with which the competent authority determines how to work out this policy.

If a permit applicant has lodged an objection against a target specification of 1 ge/m^3 as 98th or as 99.5th percentile because it is based on insufficient grounds, the licensing authority may moreover, pending the appeal procedure, change the specifications and adjust them to the current policy.

I shall also send this letter to the Chairman of the Administrative Jurisdiction Department of the Council of State for his information.

V Follow-up activities

I realise that the contents of this letter are not in every respect directly applicable to the daily practice of licensing. In modifying the general section on odour in the NeR, attention will be paid to the working method of the competent authorities in issuing permits relating to odour sources in practice.

In January 1996 special regulations of the NeR will state the results of the industry-wide studies. Through the existing and dedicated communication channels such as the NeR news letter ('NeR news') attention will also be devoted to the results of the studies. The present letter, the modification of the general passage on odour in the NeR, a proposal to include a section on nuisance classification in the NeR and the detailing of the special regulations are part of the pledge to publish a brochure and/or circular in January 1996. A 'Revised Revised Memo' will therefore not be drawn up.

If you have questions or require information, you can contact the staff of the Directorate General for Environmental Protection mentioned in Appendix 2. In Appendix 3 you will find the structure of the project organisation for Control of Odour Emissions category 1 companies.

Conclusion
From the foregoing it follows that the essential starting points of the odour policy, namely, prevention of (new) nuisance and application of the ALARA principle, will remain the core of the odour policy. They will also form the basis of the practical implementation of the odour policy. For a number of industries, sets of measures will be laid down in the NeR. It is assumed that for most of the situations they will lead to an acceptable nuisance level. A further deliberation will then have to be made on the local and regional level in order to be able to make an optimal choice tailored to the specific circumstances.

The foregoing shows that I think it is advisable and am willing to offer, where necessary, the freedom for the practical implementation of the odour policy. I believe that such an approach is in line with the efforts to keep the goals of the National Environmental Plan (NMP) within reach on this point and offers sufficient possibilities to create a durable quality of the living environment while taking into account all relevant interests. The local deliberation that must finally be made plays an important role in this approach. That is why I request your co-operation in carefully carrying out the odour policy so that the NMP goals can eventually be reached.

A copy of this letter will be sent to all relevant umbrella and industry organisations and to the Environmental Health, Spatial Planning and Housing Inspectors.

Yours faithfully,
Minister of Housing,
Spatial Planning and the Environment,

Margaretha de Boer

Appendix List of category 1 sectors

List of 16 names of industries for which a standard set of measures for the control of odour emissions will be developed:

Description	*Sector organisation*
• Composting of vegetable refuse	BVOR
• Potato processing industry	VAVI
• Meat processing industry	PVVE
• Cookie, rusk and pastry factories	VERBISKO
• Leather industry	FNL
• Cocoa factories	NCV
• Breweries	CBK
• Organic waste composting plants	VVAV
• Large bakeries and bread factories	NBS
• Aromatics and flavourings plants	NEA
• Bituminous road building materials	VBW/Asfalt
• Sewage treatment plants	UVW
• Livestock feed compounders	FNM
• Green crop drying plants*	VNG
• Coffee roasting factories	NVKT
• Dairy industry	NZO

* There already is a Special Regulation in the NeR; perhaps improvements can be made.