

IED 2.0 & process water: the technical keys to a successful transition

The Industrial Emissions Directive was revised in 2024 (Directive (EU) 2024/1785). It now regulates the water your site consumes, not only the water it discharges.

KEY POINTS



Water consumption enters the permit

The permit no longer covers only the quality of discharges. It will also set requirements for monitoring water consumption and reuse.



Limit values for consumption

Your sector's reference levels, expressed in m³ per tonne produced in the BREF, will become limits to comply with.



Two deadlines in 2027

2027 consumption will be reported, then published. By 1 July, every site must have an environmental management system with water targets.



It all starts with metering

A flow diagram and meters on the main uses: this is the basis for every other requirement.

Where do things stand?



THE RISKS FOR A SITE THAT IS NOT READY



A permit reviewed without your data

Limit values are set from the BREF levels. Without measurements, the site cannot argue its case.



Public, comparable figures

2027 consumption will be published in 2028 for each site, and comparable with other sites in the sector.



Heavier penalties

For the most serious infringements, the maximum fine must be at least 3% of annual turnover in the EU.

Three questions to ask internally

- 1 Do we have an up-to-date diagram of our water flows, and meters on the main uses?
- 2 Do we know our water consumption per tonne produced, compared with our sector's BREF?
- 3 When is our permit due for renewal or review?

If any answer is "no" or "I don't know", pass this briefing on to your environmental manager.

IED 2.0: is your site ready?

7 short questions, about 3 minutes.
Free, immediate results: where your site stands on 6 steps, and the directions to take.

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What the revised directive requires, article by article

The requirements below apply to every IED installation. They enter the permit when it is reviewed, and within 4 years of the publication of new BAT conclusions for the sector.

TOPIC	WHAT THE TEXT SAYS	IN PRACTICE
Water use Art. 11(fa) · Art. 14(1)	Efficient use of materials and water, including reuse, becomes a basic obligation of the operator. The permit sets requirements for monitoring the consumption and reuse of water, energy and raw materials.	Metering by use, stored readings, an up-to-date and traceable water balance.
Water performance Art. 15(4)	The authority sets binding ranges based on the BAT-associated environmental performance levels (BAT-AEPLs). For water, these are limit values. For waste and other resources, they are indicative levels. A derogation may not cause significant environmental impact, in particular depletion of water resources.	A specific consumption (m³/t) to comply with, just like an emission limit value.
Discharges Art. 15(3)	Emission limit values are set at the strictest level the installation can achieve by applying BAT, taking into account the full range of BAT-associated emission levels (BAT-AELs).	No more limit values set at the top of the range at permit review.
Indirect discharges Art. 15(1)	A downstream treatment plant may only be taken into account if the level of protection is equivalent, with no increased pollutant load, and without disrupting its operation or its ability to recover resources.	Pre-treatment to be reassessed for discharges to sewer or to a third-party plant.
Management Art. 14a	An EMS per installation by 1 July 2027: targets (including resource optimisation and water reuse), indicators compared with BAT benchmarks, an inventory of hazardous substances with risk assessment and substitution analysis, an audit at least every 3 years by an accredited body, information published online.	ISO 14001 alone is not enough: the inventory, BAT benchmarks and publication must be added.
Reporting Reg. (EU) 2024/1244	The Industrial Emissions Portal replaces the E-PRTR. It covers releases, transfers and the consumption of water, energy and key raw materials, from reference year 2027.	Public data per installation from 2028.
BAT timetable Art. 21(3)	Within 4 years of the publication of new BAT conclusions, permit conditions are reconsidered and the installation must comply with them.	Each BREF revision (FDM, SA...) starts a 4-year period.
Penalties Arts. 79 and 79a	Maximum fine of at least 3% of annual EU turnover for the most serious infringements. Right to compensation for people whose health has been harmed.	A financial and legal risk for management.

What may still change

On 10 December 2025, the Commission proposed (COM(2025) 986) to postpone the EMS to 1 July 2030 and to remove the chemicals inventory, the audit and the transformation plan. The European Parliament has not yet voted on it.

In our reading, this proposal changes neither consumption monitoring, nor limit values, nor the reporting of water consumption.

In Wallonia

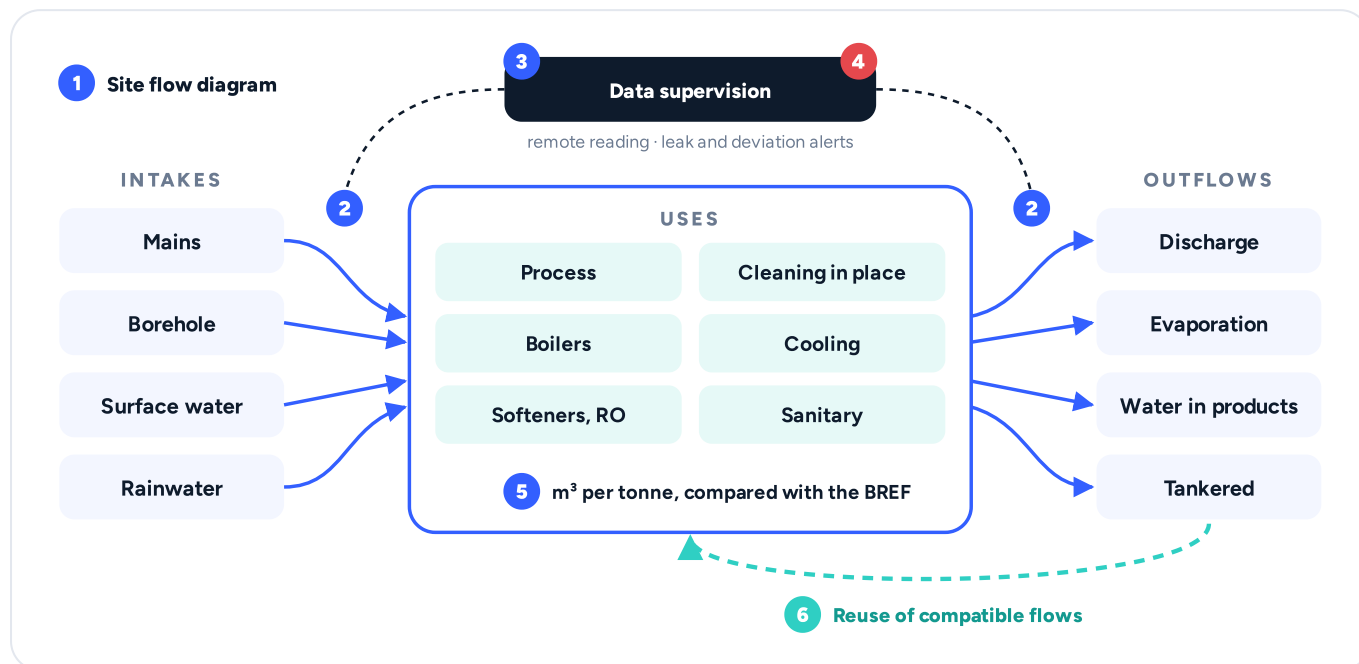
The new conditions apply through the environmental permit (decree of 11 March 1999), when each permit is reviewed.

The rate per pollution load unit (UCP) of the tax on industrial wastewater rose by 47% on 1 January 2026. Reducing discharged volumes and load also reduces the tax.

The same obligations apply in Flanders, Brussels, France, the Netherlands and Luxembourg. Only the transposition arrangements differ.

From flow diagram to action plan: six steps

Water monitoring is built in six steps, from mapping to the action plan. Each one meets a specific obligation of the directive. These are the six steps assessed by the IED 2.0 questionnaire.



1 Mapping

Diagram of intakes, uses (process, cleaning, utilities) and outflows, with the gap between intakes and outflows documented.

[Basis for the monitoring required in the permit \(Art. 14\)](#)

2 Metering

Meters on every water intake and on the main uses, read at least monthly.

[Consumption reporting from year 2027 \(Reg. 2024/1244\)](#)

3 Digitising

Remote reading of the main meters, centralised and traceable data.

[Reliable data for reporting and the EMS audit \(Art. 14a\)](#)

4 Detecting

Alert thresholds per flow: consumption at night or during shutdowns, drift in a cooling tower blowdown.

[Efficient use of water \(Art. 11\) and avoided losses](#)

5 Benchmarking

Consumption per tonne produced, by line and by month, compared with your sector's BREF levels.

[Consumption limit values at permit review \(Art. 15\(4\)\)](#)

6 Improving

Quantified action plan: reductions and reuse of compatible flows, depending on their quality (conductivity, COD, TSS, temperature).

[EMS water targets by 1 July 2027 \(Art. 14a\)](#)

Revalio's IED water assessment

Revalio is an independent engineering firm specialising in industrial water treatment and reuse. We do not sell equipment, which keeps our recommendations neutral.

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- 01 Measured water balance and metering plan
- 02 Comparison with the BREF and the permit
- 03 Quantified reduction and reuse options
- 04 Water targets and indicators for the EMS

Sources. Directive (EU) 2024/1785 of 24 April 2024 amending Directive 2010/75/EU; Regulation (EU) 2024/1244 on the Industrial Emissions Portal; proposal COM(2025) 986 of 10 December 2025 (procedure 2025/0394(COD)); Walloon programme decree of 19 December 2025, Art. 63. General information document, up to date as of October 2026. It does not constitute legal advice: the applicable transposing text and your permit prevail.