

Integrated Pollution Prevention and Control – IPPC

(Proposal for a Directive of the European Parliament and the Council on industrial emissions)
COM(2007) 844 final
2007/0286(COD)



20th October 2008

COGEN Europe welcomes the recasting of the IPPC Directive. Specifically we recognise the recommendation in favour of the use of a **Best Available Technologies (BAT)** principle to promote an integrated approach to achieving the primary aim of protecting the Environment.

However, COGEN Europe believes the Commission's approach, as well as a number of tabled amendments, are **not in line with the spirit of the IPPC Directive**. These particularly affect gas engines and turbines in cogeneration plants which are widely recognised as the **most fuel efficient method to produce heat and power** and therefore are potentially significant contributor to Europe's strategy to achieve its 2020 climate and energy targets. The current proposals would decrease the overall technical and commercial effectiveness of these cogeneration sectors and could halt expansion in the use of natural gas, biogas and innovative gaseous fuels in Europe.

COGEN Europe raises the following specific concerns:

- The gas engine sector contributes **ONLY 0.4 % and 0.0056 % to the total EU emissions of NOx and CO** (based on the LCP BREF, page 13, table 1.6 and corrected to take into account all NOx and CO contributions) – the IPPC integrated approach is lost.
- Extending the scope to smaller plants (from 50 to 20 MW) will lead to **virtually no further reduction in NOx and CO emissions** but **has a high cost for end users**.
- The emission limit values proposed **do not take into account the views expressed by industry** in the BREF document (footnotes 2 and 3 of table 7.36, page 481). On page 480 it is indicated that "for gas-fired stationary engine plants, the lean burn approach is BAT analogous. This is an inbuilt method **and no extra reagents or water need to be supplied to the site for NOx reduction....**". The stipulated limits in the IPPC proposal do not reflect this !
- The Combined Heat and Power **CHP plant bonus is removed for gas turbines**: the high fuel efficiency of cogeneration is no longer recognised. Efficiency bonuses should be granted for gas engines and gas turbines in order to give incentives for efficient power production.
- **Lower energy efficiency (higher fuel consumption and thus higher operation cost) and higher CO2 emissions** will result from compliance with excessively low NOx and CO emissions thresholds.
- Extremely low emission values will **increase pressure on water use** and will require use of **ammonia** (for selective catalytic reduction installations). This will result in additional secondary pollutions from the production and transportation of the reagents from factories to the plants.

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An inappropriate “one size fits all” approach:

- The proposed emission limits **do not take different types of gas into account.**
- The proposed limits **do not take different gas engine technologies into account**
- **The flexibility mechanism is lost in the proposal.**

COGEN Europe believes that the Environment Committee of the European Parliament must push for legislation that carries tangible benefits for the environment and European citizens. In the case of gas engines, the proposals presented by the Commission do not offer any substantial benefits and would harm the development of small decentralised power and heat generation in the EU.

Also, we urge:

(a) MEPs to take the above points into consideration when setting the ELVs for gas engines in Annex V, parts 1 and 2 (point 5, table) of the IPPC Directive.

(b) The Council and Commission to re-introduce flexibility by creating gas-specific and engine-type specific limits which are not lower than current BAT.