EUROMOT POSITION

13 February 2015

Amendment proposal on the inclusion of an aggregation rule into the “Proposal for a Directive of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants” (COM(2013)919 final) as of 18 Dec 2013

The lack of aggregation below 1 MW in the Commission proposal may distort the market towards use of multiple smaller engines, whilst the broad aggregation in the proposed Council amendment could unnecessarily bring into scope thousands of small engines. EUROMOT proposes the middle ground with aggregation only in the case of power-sharing applications.

(Amendment proposals on both options in detail provided on the next page)

For more information please contact:

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Insert new Article 3a, Aggregation Rules

Amendment

1. For the purpose of calculating the total rated thermal input of a combination of combustion plants, individual combustion plants with a rated thermal input below 1 MW shall not be considered unless multiple MCP are installed for the same purpose on a single site in a load-sharing arrangement. In this case the load-sharing combination formed by such plants shall be considered as a single combustion plant and their capacities added for the purpose of calculating the total rated thermal input even if each individual MCP has a rated thermal input below 1 MW.

Justification

The aggregation of a range of different combustion plant (boilers, engines, etc) with a rated thermal input below 1 MW is not generally appropriate when determining if a plant has exceeded the 1 MW threshold for the application of the medium combustion plant emission limit values. However, there are concerns that this may encourage the installation of smaller engines in a load-sharing arrangement with the purpose of circumventing the Directive. For example, an installation of multiple engines of 990 kWth could be considerably lower ownership cost than a plant comprising engines > 1 MW, distorting the market for the latter engines. Whilst a general aggregation requirement would be requested, nor the lowering of the threshold, it is proposed to consider requiring to aggregate multiple MCP installed on a single site for the same purpose in a load sharing arrangement.
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