
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_{th} in the Commission proposal may distort the market towards use of multiple smaller engines, whilst the broad aggregation in the proposed Council amendment¹ 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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¹ “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 – General Approach” as of 12 Dec 2014, Ref 16817/14

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ENGINE IN SOCIETY

A European Interest Representative (EU Transparency Register Id. No. 6284937371-73)

A Non Governmental Organisation in observer status with the UN Economic Commission for Europe (UNECE) and the International Maritime Organisation (IMO)

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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Our **EU Transparency Register** identification number is **6284937371-73**.

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