The European Association of Internal Combustion Engine Manufacturers

EUROMOT

EUROMOT POSITION

13 February 2015

2011 YEARS Promoting Engine in Society

Summary of EUROMOT comments on 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

EUROMOT supports harmonised emissions legislation set at a level that can deliver cost-effective improvement in EU air quality. The Commission has proposed a directive that covers a huge range of engine types and sizes. Worryingly, the proposal appears to include categories of engines that are in scope of overlapping or conflicting legislation, or that will only operate in case of emergency. Importantly, whilst the emission limit values (ELVs) proposed are achievable for some engine types, for certain types and sizes the ELVs are too demanding and cannot be achieved using the Best Available Technology (BAT).

EUROMOT members have the following concerns with the proposed regulation:

1. Range of engines in scope of proposal

1.1. Overlapping or conflicting legislation

It is essential to exclude from scope engines that are included in, or are the process of being included in, the scope of other legislation, or where the requirements of other legislation (such as safety) conflict with this proposal.

1.2. Emergency operation

There are hundreds of thousands of engines across the EU on standby to protect life and to maintain critical services in an emergency. It is burdensome to require registration under this directive and inappropriate to require secondary abatement to comply with ELVs. Furthermore, it would be completely inappropriate for certain applications such as in nuclear power plants to set up any emission limits.

1.3. Research, Development and Testing Activities

Setting emission limits on research, development & testing activities hampers growth. These activities should be excluded, consistent with the Industrial Emissions Directive (2010/75/EU).

1.4. Impact of aggregation

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[1] could unnecessarily bring into scope thousands of small engines. EUROMOT proposes the middle ground with aggregation only in the case of power-sharing applications.

2. Emission Limit Values (ELVs) for new engines

2.1. NOx ELV is inappropriate for engines operated on biogas

The proposed ELV would require secondary abatement techniques that will be damaged by impurities in the biogas. Consequently the ELV should be set at a value that does not require secondary abatement.

2.2. SO_2 ELVs are unnecessarily strict and incompatible with fuel sulphur levels

There are a range of fuels used in stationary combustion plant. The EU legislation applying to these fuels recognises that they may have substantially higher sulphur content than road diesel. There has been an 82% reduction in SO_2 emission across the EU over the period 1990-2010 and all member states fulfil their SO_2 obligations under the National Emission Ceiling (NEC). SO_2 ELVs should be adjusted to be compatible with the fuel types permitted by the EU fuels legislation.

2.3. NOx ELV for operation on natural gas impacts efficiency of engines and of combined heat & power (CHP) installations

The proposed NOx ELV for operation on natural gas requires engines to be tuned to operate in a mode called ‘enhanced lean-burn’. The downside of this measure is that the fuel

[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

consumption will increase substantially the exhaust (flue) gas temperature will decrease and emissions of CO, HC will increase steeply. This is detrimental for Combined Heat and Power (CHP) applications which rely upon extracting heat from the flue gas. This is not in line with principles of EU Integrated Pollution Prevention & Control nor with EU targets to decrease greenhouse gas emissions and increase energy efficiency. NOx ELVs should be adjusted to enable use of standard lean burn and rich burn engines.

2.4. NOx ELV for liquid fired medium/slow speed engine types

Stipulated NOx limits are achievable only by use of high cost secondary emission abatement technique, namely SCR. This is not in alignment of the general principle that limit values should mainly be based on application of primary measures. Prerequisite for SCR usage is also an existing infrastructure. Thus in remote areas with weak existing infrastructure emission limit derogation should be made in order to secure a cost effective balance between environmental and cost aspects.

2.5. Particulate matter (dust) ELV for operation on liquid fuel is not achievable with Best Available Technology for certain engine types

The proposed particulate matter (dust) ELV for engine operation on liquid fuels is more stringent than the value in the EU Best Available Technology Reference document (BREF) for big plants. Additionally, diesel particulate filters (DPF) are neither suitable nor existing for these bigger medium/slow speed type engines, particularly when they are operated on the higher sulphur fuels used in stationary applications. The ELVs proposed by European Commission consequently cannot be achieved with the larger medium and slow speed engine types. Particulate matter (dust) ELVs should be adjusted to enable these engine types to be used.

3. Emission Limit Values (ELVs) for existing engines

ELVs for existing engines should not be stricter than for new engines

Euromot remains available for further clarifications and in-depth discussions of our positions.

For more information please contact:

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EUROMOT is the European Association of Internal Combustion Engine Manufacturers. It is committed to promoting the central role of the IC engine in modern society, reflects the importance of advanced technologies to sustain economic growth without endangering the global environment and communicates the assets of IC engine power to regulators worldwide. For more than 20 years we have been supporting our members - the leading manufacturers of internal combustion engines in Europe, USA and Japan - by providing expertise and up-to-date information and by campaigning on their behalf for internationally aligned legislation. The EUROMOT member companies employ all over the world about 200,000 highly skilled and motivated men and women. The European market turnover for the business represented exceeds 25 bn euros.
Our **EU Transparency Register** identification number is **6284937371-73.**

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