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## **EUROMOT POSITION**

**20 January 2015**



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### **General 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 – General Approach” as of 12 Dec 2014**

On 17 December 2014, the Council has adopted a “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” (2013/0442/COD). The paper is based upon a Commission proposal as of December 2013 and reflects a compromise position accomplished after discussions throughout 2014 under the Italian presidency.

The Commission proposal covers medium-size combustion plants (MCP) with a rated thermal input between 1 and 50 MW and introduces emission limit values for existing and new combustion plants, engines and gas turbines for sulphur dioxide, nitrogen oxides (NOx) and particulate matter. Within the regulatory EU air quality framework, it is intended to represent a third pillar besides the Directive 2010/75/EU on industrial emissions and the Directive 2009/125/EC on ecodesign requirements for energy-related products. With respect to the power bands covered for stationary combustion engines it is similar in scope to the UNECE Gothenburg protocol as revised in May 2012.

The essential elements of the Commission proposal are, amongst others, the following:

- The exclusion of certain combustion plants from the scope of the Directive on the basis of their technical characteristics, their annual operating time or their use in particular activities, including energy related activities;
- The distinction between existing and new plants;

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#### **ENGINE IN SOCIETY**

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

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- The introduction of emission limit values (ELV) for sulphur dioxide, nitrogen oxides and particulate matter (dust) according to the type of the engine, the type of fuel used, and whether the plant is existing or new;
- The addition of aggregation rules (in case of two or more plants with a common stack);

During the Council discussions, the original Commission paper has undergone substantial changes. With a view to our mission to support the development and implementation of environmentally friendly, technically feasible and economically feasible regulations, **Euromot broadly welcomes these changes and the accomplished Council position (“General Approach”) as of 17 Dec 2014.**

**However, we would like to raise additional and, in some cases, complementary issues which need to be addressed in forthcoming discussions in the European Parliament.**

In particular, we are proposing amendments to:

- Art. 2 on the scope of the proposal and certain types of applications to be exempted, including emergency use;
- Art. 3 on definitions for combustion plants and engines, including the emergency applications;
- Art. 3a on the methodology for categorising single and multiple installations;
- Annex II on emission limit values, specifically on tables 1c and 2c for existing and new engines where some proposed emission limits are beyond best available technology (BAT)

We have covered all of these amendment proposals to the Council text of 17 Dec in detail in five individual Euromot position papers on the:

- Scope
- Definitions
- Aggregation rule
- Emission limit values for liquefied fuelled engines
- Emission limit values for gaseous fuelled engines

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

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**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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