EUROMOT

The European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers

EUROMOT POSITION

Amendment proposals for COM (2025) 986 final - Annex 2

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directives 2008/98/EC, 2010/75/EU, (EU) 2015/2193 and (EU) 2024/1785 of the European Parliament and of the Council as regards simplification of some requirements and reduction of administrative burden

Bruxelles, 24 March 2026

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents manufacturers of internal combustion engines and alternative powertrains installed in nonroad mobile machinery, marine and stationary applications, as well as power tools and garden equipment.
We welcome the opportunity to contribute to the proposed simplification of administrative burdens in environmental legislation as provided by the eighth omnibus package, primarily to COM (2025) 986 final – Annex 2 of the Medium-Sized Combustion Plants Directive (EU) 2193/2015.

1. Introduction

To meet the target of ensuring that the environmental goals of the European Union are achieved in more efficient, less costly and smarter ways, EUROMOT proposes amendments to COM (2025) 986 final – Annex 2, as given in below table in strikethroughs and **bold text** along with respective explanations.

2. Exemption from periodic measurements

EUROMOT welcomes the Commission's proposal regards exemption from periodic measurements for engines which do not operate more than a limited number of hours per year, and which are used only occasionally as back-up generators during emergency situations and power outages.

However, we are of the opinion that the proposal should be extended to all engine types.
These engines operate in general on gas oil or natural gas. MCPD annex 2 table 3 of Part 1 (existing plant),and table 2 of Part 2 (new plant) stipulate only a NOx emission limit when operating on gas oil or natural gas. **Member states may exempt these low hour/emergency plants from compliance with emission limits set in Annex 2**. Engines can be equipped with NOx sensors indicating that NOx emission limits (if regulated) are maintained between the extended periodic emission compliance measurements. Annex 3 stipulates that CO shall also be periodically measured although not a limited emission compound.
By this both environmental and commercial aspects are covered in a cost-effective way.

3. Amendment proposals to COM (2025) 986 final – Annex 2, "Annex II, 2. Annex III to Directive (EU) 2015/2193 is amended as follows:"

COM (2025) 986 final – Annex 2	EUROMOT Proposal
(c) In Part 1, point 2, the second indent is replaced by the following two indents: '- three times the number of maximum average annual operating hours, applicable pursuant to Article 6(3) or (8), for medium combustion plants with a rated thermal input equal to or greater than 20 MW that meet the requirements applicable to 'category NRG' in respect to Stage V controls under Regulation (EU) 2016/1628 of the European Parliament and of the Council[1], - the number of maximum average annual operating hours, applicable pursuant to Article 6(3) or Article 6(8), for medium combustion plants with a rated thermal input greater than 20 MW that do not meet the requirements applicable to 'category NRG' in respect to Stage V controls under Regulation (EU) 2016/1628.'	(c) In Part 1, point 2, the **first and** second indent **are** replaced by the following indent: '- three times the number of maximum average annual operating hours, applicable pursuant to Article 6(3) or 6(8).~~, for medium combustion plants with a rated thermal input equal to or greater than 20 MW that meet the requirements applicable to 'category NRG' in respect to Stage V controls under Regulation (EU) 2016/1628 of the European Parliament and of the Council[4],~~ ~~- the number of maximum average annual operating hours, applicable pursuant to Article 6(3) or Article 6(8), for medium combustion plants with a rated thermal input greater than 20 MW that do not meet the requirements applicable to 'category NRG' in respect to Stage V controls under Regulation (EU) 2016/1628.'~~

Reasoning:
Periodic measurements for engines which do not operate more than a limited number of hours per year (typical rolling average 500 hours/year), and which are used only occasionally as back-up generators during emergency situations and power outages, should be extended to every five years or 1500 hr operating hour. As engines operated with gasoil or natural gas need (if regulated by the member state) to comply with NOx emission limits only (MCPD annex II, Table 3 of Part 1 (existing plant) and table 2 of Part 2 (new plant)). They can be equipped with NOx sensors to demonstrate compliance between the mandatory periodic emission measurements. Annex 3 stipulates that CO shall also be periodically measured although not a limited emission compound.
By this approach, unnecessary burdensome and costly emission measurement compliance measurements can be avoided in small or medium size power plants whilst fully meeting the omnibus targets of simplifying for sustainable competitiveness by implementing coherent faster and more efficient procedures.

4. Amendment proposals to 2025/0394 (COD) – Main text: Recital (19) (page 14)

2025/0394 (COD)	EUROMOT Proposal

(19) Under Directive (EU) 2015/2193, Member States are allowed to exempt certain existing or new medium combustion plants used only occasionally as back-up generators during emergency situations and power outages and which do not operate more than a limited number of hours per year, from compliance with relevant emission limit values.	(19) Under Directive (EU) 2015/2193, Member States are allowed to exempt certain existing or new medium combustion plants used only occasionally as back-up generators during emergency situations and power outages and which do not operate more than a limited number of hours per year, from compliance with relevant emission limit values.
Under those circumstances, such back-up generators are still submitted to periodic measurements in relation to their ~~**SO2,**~~ NOx**,** ~~**dust**~~ and CO emissions., even if such measurements are not used to assess compliance against relevant emission limit values. ~~**In addition, the periodicity of such measurements does not distinguish between more recent - and thus more energy efficient back-up generators - and older ones**~~**.**	Under those circumstances, such back-up generators **operating on gas oil or natural gas** are still submitted to periodic measurements in relation to their NOx and CO emissions, even If such measurements are not used to assess compliance against the relevant emission limit values.
With a view to simplifying and reducing the administrative burden stemming from the current reporting requirements arising under Directive (EU) 2015/2193 in relation to ~~**SO2,**~~ NOx ~~**dust emissions**~~ and CO emissions from ~~**recent**~~ back-up generators ~~**with a rated thermal input equal to or greater than 20 MW,**~~ it is appropriate to set a specific threshold for a minimum number of operating hours applicable to their use, below which the frequency of periodic measurements would be lowered.	With a view to simplifying and reducing the administrative burden stemming from the current reporting requirements arising under Directive (EU) 2015/2193 in relation to NOx and CO emissions from **gas oil/natural gas fired** back-up generators**,** it is appropriate to set a specific threshold for a minimum number of operating hours applicable to their use, below which the frequency of periodic measurements would be lowered.
~~**The more recent back-up generators are those that comply with the emission limits values applicable to non-road mobile machinery, category NRG in respect of Stage V controls, set out in Annex II to Regulation (EU) 2016/162818 on requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery**~~.**	
For those back-up generators, periodic measurement should take place after 1500 operating hours have elapsed, or at least every five years.	For those back-up generators, periodic measurement should take place after 1500 operating hours have elapsed, or at least every five years.

Reasoning:
Periodic measurements for engines which do not operate more than a limited number of hours per year (typical rolling average 500 hours/year), and which are used only occasionally as back-up generators during emergency situations and power outages, should be extended to every five years or 1500 hr operating hour. As engines operated with gasoil or natural gas need (if regulated by the member state) to comply with NOx emission limits only (MCPD annex II, Table 3 of Part 1 (existing plant) and table 2 of Part 2 (new plant)). They can be equipped with NOx sensors to demonstrate compliance between the mandatory periodic emission measurements. Annex 3 stipulates that CO shall also be periodically measured although not a limited emission compound.

By this, unnecessary burdensome and costly emission measurement compliance measurements can be avoided in small or medium size power plants whilst fully meeting the omnibus targets of simplifying for

sustainable competitiveness by implementing coherent faster and more efficient procedures.

5. Conclusion

EUROMOT is proposing above amendments to COM (2025) 986 final – Annex 2 to ensure the targets of simplifying for sustainable competitiveness are met.
In general *EUROMOT welcomes_proposals promoting regulatory consistency and reducing unnecessary administrative burdens by applying faster and efficient procedures. Regarding the exemption from periodic measurements this should be extended beyond the Stage V Non-Road (NRG) category to all type of low-use hour engines operating on gas oil or natural gas. Furthermore, EUROMOT Members strongly encourage for the future to extend this principle to other applications not currently covered by any emission regulations - specifically, stationary applications with a thermal input below 1 MWth. Such an extension would ensure a coherent cost-effective approach across all engine categories, supporting innovation and practical implementation while maintaining environmental standards.*

We remain available for any further questions you might have on our amendment proposals.

6. Sources

/1/ COM(2025) 986 final ANNEX 2, at web: 93fd695e-c0d7-4b86-9795-810846b2ab6d_en

/2/ MCPD 2015/2193 at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L2193

/3/ b45b4ac2-7f40-4b82-acb3-815e134807b6_en

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THIS IS EUROMOT

Founded in 1991, EUROMOT is the European association of internal combustion engine and alternative powertrain manufacturers. Representing the key global manufacturers for over 30 years, we provide an invaluable centre of expertise for businesses, authorities, regulators and public stakeholders worldwide. We are the industry's united voice to drive smart and gold standard global regulations for sustainable mobile machinery and stationary applications, helping the manufacturers shape innovations and markets for the future.

With an ecosystem of working groups spanning current and future power and mobility systems, we facilitate cross-fertilisation of innovation across industries. EUROMOT provides an essential gateway to the EU Single Market and forms a bridge for the transition from traditional to alternative energy and advanced powertrains.

Since our foundation, we have been facilitating ever increasing environmentally friendly and sustainable products as well as the decarbonization of our sector and its transition to low/zero-carbon emissions and renewable energy. With a membership encompassing all major ICE and alternative powertrain manufacturers and well-established connections to regulators, EUROMOT is uniquely positioned to decarbonise entire industries from agriculture to construction and from land-based to marine alongside stationary power for heat and electricity.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

OUR MEMBERS