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## Position Paper

### Reference document on best available techniques for Large Combustion Plants (LCP BREF) of Industrial Emissions Directive (IED)

EPPSA acknowledges the importance of meeting the agreed energy targets of the EU, including reduction of CO<sub>2</sub> emissions and increase of energy production efficiency.

In order to help achieve better environmental performance levels, EPPSA has continuously provided its contributions to the Article 13 Forum meetings by submitting recommendations to ensure true reflection of the technical results of the Large Combustion Plants' (LCP) positions. EPPSA also delivered its opinions on the proposed final draft Best Available Techniques (BAT) conclusions in October 2016.

It is now up to the Article 75 Committee of the Industrial Emissions Directive (IED) to decide on the endorsement of the LCP BREF Conclusions, as agreed by the Article 13 Forum.

EPPSA fully understands that some existing power plants in Europe will find it challenging to reach these stringent levels – hence, endangering their economic viability. In such cases the IED foresees the possibility to provide exceptions to the LCP BREF Conclusions following Art. 15.4. The member states may decide if this would be the best solution in relation to the national and European electricity system.

However, for most of the existing LCPs, the implementation of the LCP BREF Conclusions are economically and technically feasible. Therefore, the LCP BREF should as such not be disregarded, as it would lead to potentially 27 national regulations, go against the idea of EU-wide environmental standards and undermine the EU-wide level playing field.

Following careful analysis of the BREF framework and discussions with our members, EPPSA has recommended the following measures to assist the plants in adapting to the new rules:

- **Flue gas cleaning:** EPPSA has published a brochure on flue gas cleaning that highlights the available technologies to reduce NO<sub>x</sub> emissions, which can be retrofitted to the existing power plants with reasonable cost levels. Please see the brochure at the following link: <http://www.eppsa.eu/technical-brochures.html>

- **Mercury removal:** EPPSA has also published a brochure on mercury removal highlighting the fact that at European level, mercury, along with other pollutants, has been classified as a priority substance. This type of classification urges all individual member states to progressively reduce emissions. However, there are affordable state-of-the-art mercury removal technologies available in the market that are offered by the European power plant suppliers. Please see the brochure at the following link: <http://www.eppsa.eu/technical-brochures.html>

As every plant's operation is different and requires dedicated technologies, EPPSA members can ensure that such plants are supplied with tailor-made solutions, which will meet environmental objectives in a cost-effective manner.

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*The European Power Plant Suppliers Association (EPPSA) is the voice, at European level, of companies supplying power plants, their components and related services. EPPSA members, located throughout Europe, represent a leading sector of technology with more than 100 000 highly-skilled employees.*

*EPPSA actively promotes awareness of the importance of flexible and efficient, state-of-the-art thermal power generation and its crucial contribution to ensuring a clean, secure and affordable energy supply.*

*EPPSA believes increased investment in Research, Development and Demonstration is a key factor in driving EU competitiveness as well as ensuring an affordable low emission power supply.*

*Virtually all thermal power plants in the EU are built by members of EPPSA or equipped with their components, and provide around 50% of Europe's electricity. EPPSA members provide the most advanced thermal power technologies in the world.*

