

Position of the European gas and steam turbine manufacturers on the review of the IPPC Directive

BAT concept and its role for effective legislation

The European turbine industry is committed to the integrated approach of the IPPC Directive as well as to the "Best Available Technique" (BAT) concept that takes into account the technical characteristics of the installation concerned, its geographical location and local environmental conditions.

Our industry clearly calls for keeping the BAT Reference Documents (BREF) as a guidance, non-binding document for the permitting procedure within the European Economic Area. Flexibility in setting permit conditions is necessary to achieve environmental objectives for an individual plant in a cost-effective manner. As local site conditions can vary drastically complex judgement is essential to meet pollution reduction targets in the most efficient way.

In order to further harmonise the permitting of installations EUTurbines proposes a Generic Implementation Guide for the BREFs that sets a standard on how to use the document including the evaluation of the different categories of Emission Limit Values and site conditions. Complemented by regular training of the authorities this Implementation Guide would contribute to increase the effectiveness of the legislation.

Binding minimal Emission Limit Values within the IPPC Directive

The European turbine industry regards the Large Combustion Plant Directive (LCPD 2001/80/EC) as sufficient minimum requirement for this sector.

Single directive approach on industrial emissions (e.g. LCPD+IPPC+WID)

The streamlining of regulations to create a single directive is not favourable from EUTurbines perspective, as different types of regulations would be combined, with all difficulties related to the transposition in the Member States. EUTurbines calls for actions at Member State level (such as combined permitting, streamlined procedures for permit applications, monitoring and reporting by operators).

Small scale installations (below 50 MWth)

The European turbine industry is opposed to the inclusion of small scale installations (below 50 MW thermal input) in the IPPC Directive and accordingly in the BREFs. The complexity of the permitting procedure is not appropriate for such small units that often have product character and are sometimes even movable. This additional legislative effort could result in business impacts for the manufacturers since alternatives (e.g. electric motor drives) do not require comparable permits.

In order to regulate these applications the European turbine industry calls for a simple approach like the *TA Luft* in Germany with a single limit value category, or alternatively the definition of two or three emission limit categories. Based on local environmental and economic conditions, the authority would specify one of these predefined categories for a particular permit. EUTurbines is prepared to assist in defining these categories for the gas and steam turbine industries.

NO_x and SO_x emission trading

The European turbine industry is reluctant to apply emission trading to NO_x and SO_x. This procedure would result in increased administrative burden and the potential of benefits is small due to the long history of applied Emission Limit Values. Another drawback is the increase of uncertainties, which could harm the investment climate in the long-term oriented power sector.

Furthermore from a practical and economic viewpoint additional, complex measurements would be required to ensure reliable monitoring and trading.