

Revision of Industrial Emissions Directive

April 2021

EUTurbines, the European Association of Gas and Steam Turbine Manufacturers, acknowledges and supports the important role of the Industrial Emission Directive (IED) to reduce pollution from industrial activities. Its application has strengthened the development and deployment of improved techniques to prevent and control environmental impacts from industrial installations. In this sense, the IED remains relevant and coherent with the EU climate 2050 target, already covering the key environmental aspects and most relevant pollutants.

The comments below summarise the main messages from EUTurbines to the European Commission's public consultation and the Targeted Stakeholder Survey.

Potential extension of the production capacity thresholds for (agro-)industrial activities

The MCPD (Directive (EU) 2015/2193) is a well-functioning piece of legislation, which takes into account the specificities of smaller installations. Moving some of these into the IED would mean additional administrative burden and uncertainties for small installations – without significant environmental benefits, as they are already well covered under the existing MCPD. Therefore, the production capacity threshold for combustion plants should not be modified.

Approach on BAT-AELs and ELVs

A certain flexibility when setting ELVs in permits is needed, to reflect differences in applications and technology sizes – including potential derogations in certain cases, where the BAT-AELs may not be representative of a given application. This flexibility will increasingly be needed to allow the flexible operation of power plants, as more variable renewables are introduced into the system – increasing the need for reliable and flexible gas power generation to provide back-up both at utility level and at industrial level. In addition, in connection with the decarbonisation of the gas sector and the introduction of renewable and low-carbon gases into the natural gas pipeline – which may have a different combustion behaviour –, a more flexible approach will be needed to accommodate the use of fuels other than natural gas. Therefore, the flexibility allowed through IED Articles 15(3[b]) or 15(4) should be maintained.

In the same way, the considerations to use the lower BAT-AEL range by default to set ELVs is not appropriate and could potentially limit the operation of key industrial plants. In the case of gas turbines, the range provided in the LCP BAT Conclusions shows the differences in turbine sizes and different types of installations. With the proposed approach, those differences, which need to be considered, would be ignored.

Similarly, it would not be adequate to set ELVs that go beyond BAT. The IED and LCP BAT Conclusions outline the AELs connected to best available technologies. Setting thresholds beyond those levels is not an adequate approach, as the best available technologies would already not be able to deliver.

GHG emissions in the BREF process

GHG emissions from the power sector are best regulated through an emission trading scheme or a predictable carbon price. This market-based regulatory approach enables and encourages cost-effective and best available technology implementation to promote GHG emission reductions.

Site-specific GHG emission limits will not necessarily incentivise emission reductions or technology enhancement. This may result in plant operational restrictions – increasingly important in a system with more variable renewables –, which could in turn impact the grid stability and cause disruptions (e.g., frequency excursions, brownouts, etc...). However, this would not provide any incentive for the facility to perform better than the established emission

limit. Therefore, a market-based carbon policy would better incentivise the balancing of emissions across the grid, leading to lower overall emissions.

Resource efficiency BAT- AEPLs

Power generation economics drive the plant design and operation to utilise the fuel as efficiently as possible and, consequently, with lowest CO₂ emissions. Additional requirements for energy efficiency will simply regulate what plant operators are already incentivised to do, resulting in additional regulatory burden without additional environmental benefits.

It is also important to note that some emission reduction technologies may result in lower plant efficiency. The trade-off between lower emissions and efficiency should be reflected in any energy efficiency standards. Ultimately, the market should determine the best technology based on overall performance while meeting emission targets.

The LCP BAT Conclusions already contain BAT-AEELs for large combustion plants as an indication of the performance of best available technologies. Additional requirements should not be introduced.

Uptake of innovations

The potential of emerging techniques should be better covered in the permitting process. In this sense, upscaling the Innovation Observatory to monitor the Technology Readiness Level (TRL) of emerging and breakthrough technologies could help having a better understanding of latest developments and technologies' capabilities.

Use of renewable and low-carbon gases in power generation

In connection with the decarbonisation of the gas sector and the introduction of renewable and low-carbon gases into the natural gas pipeline, the IED should prepare the ground for these developments and already recognise their importance. As some of these gases, such as hydrogen, may have different combustion behaviours than natural gas, future legislation should also take into account the differences and impact of their combustion in installations covered by the IED, such as large combustion plants.