

Adaptation of the requirements of the LCP Directive for the specific needs of the Contracting Parties

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The LCP Directive

- Directive 2001/80/EC - sets requirements for Large Combustion Plants concerning emissions into the air
- Emission Limit Values (ELVs) for the energy generation sector using different types of fuels (solid, liquid and gaseous)
- ELVs for SO₂, NO_x and dust
- Implementation deadline for Contracting Parties: **31 Dec 2017**

Flexibility mechanisms in the LCP Directive

- Two main ways of implementation:
 - 1) Art. 4(1) and (2) in connection with Annexes III to VII - compliance with individual ELVs
 - 2) Art. 4(6) - preparation of a NERP
- Art. 4(4) - Limited lifetime derogation (opt-out)
 - Temporary exemption for meeting the ELVs
 - Limited in time
 - Plant has to shut down at the end of the derogation period → security of supply has to be strictly considered
- Art. 5(1) – Peak load plants

If a plant only operates a limited amount of hours every year, it may be subject to less stringent ELVs

Flexibility mechanisms in the LCP Directive (cont.)

- Annex III, Part A – Desulphurization rate (for solid fuels)
 - where the ELVs cannot be met due to characteristics of the fuel (coal with high S-content)

EXISTING

- at least 60% for plants ≤ 100 MW
- at least 75% for $100 \text{ MW} < \text{plants} \leq 300 \text{ MW}$
- at least 90% for $300 \text{ MW} < \text{plants} \leq 500 \text{ MW}$
- at least 94% for plants $\geq 500 \text{ MW}$

NEW

- at least 92 % for plants $\leq 300 \text{ MW}$
- at least 95% for plants $> 300 \text{ MW}$
- with the restriction of certain maximum emission levels

Deadlines / dates in need for adaptation

- Art. 4(4) – opt-out
 - LCPD provides 8-year period with 20 000 operational hours, EC should operate with a comparable timeframe
 - in EU, operators had to provide a written declaration 3,5 years in advance (by 30 June 2004)
 - could be considered together with IED compliance (to be put in the draft decision if supported)
- Art. 4(6) – NERP
 - base-year emissions have to be set
 - submission date (27 November 2003 in LCPD)
- Art. 5(1) – peak load plants (setting deadlines)

Steps ahead

- COM proposal – currently in the making
- EC dates / deadlines have to be adopted by Ministerial Council / PHLG (based on a relevant mandate) at the next MC
- Support from Contracting Parties / Presidency is vital
- Deadline of 31 December 2017 (compared to the ones in the LCPD) as baseline for setting these