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## Central Europe Energy Partners' (CEEP) statement on Best Available Techniques (BAT) conclusions for Large Combustion Power Plants (LCP)

The Directive on Industrial Emissions (IED) is the main EU instrument regulating emissions from industrial installations. The Best Available Techniques (BAT) Conclusions for the Large Combustion Plants (LCP), which will be finalised soon, will constitute the main tool to ensure further emissions reductions from combustion units, which will be contributing to the better protection of environment and human health.

Central Europe Energy Partners fully supports these ambitions and efforts. Simultaneously, taking into account the share of electricity generated from fossil fuels combustion in Central Europe, as well as the already achieved impressive rate of emissions cuts in the past decade, we anticipate that the consequences of this document will have a tremendous impact on the power and energy intensive sectors, since it affects economic and social dimensions.

CEEP welcomes EC's intentions to establish an effective framework to ensure that environmental goals will be met in the most cost-effective way. However, we would like to underline that the establishment of the binding BAT Conclusions for the LCP must acknowledge national specificities and should guarantee a fair transition and not diminish competitiveness of the European industry and reliability of electricity supply.

Therefore, our key recommendations on the BAT Conclusions adoption process are:

 The technical accuracy principle should be the leading one in the BAT Conclusions adoption process and it should reflect the specifics of the available fuels. The emissions levels cannot be put above the technically justified limitations. Particularly, the situation of the lignite-fired combustion plants should be adequately addressed. We call for realistic caps on emissions values (notably NO<sub>x</sub> and Hg) adjusted to the technical and economic reality. The BAT AELs for the Hg emissions levels should be established in the most cost-efficient as well as applicable way. In this regard, emissions levels dedicated to the lignite power plants of NO<sub>x</sub> should be set at the level of 190 mg/Nm<sup>3</sup>. This volume is justified as possible to be met with use of the economically feasible primary measures.

 In order to allow power sectors of Central European states to implement proposed changes, it's inevitable to resort to 'temporary derogations', safeguarded by article 15(4) of the IED. We believe that eligibility criteria for granting integrated permit with derogation should be more flexible to respect varying conditions and challenges among different member states. Therefore, we suggest to better reflect such important factors as the security of supply, which can be quantified, e.g. the cost of the undelivered energy.