

Circulation: NFU members

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## Proposed Medium Combustion Plant Directive

### Purpose

To inform members of the newly proposed Medium Combustion Plant Directive and gain feedback on how this will impact the industry.

### Background

A new Directive has been proposed by the European Commission entitled the Medium Combustion Plant (MCP) Directive. This Directive was proposed as part of the European Commission's Clean Air Policy Programme which came out on the 18th December 2013. It is designed to reduce emissions to the atmosphere and fill the regulatory gap between 1 to 50MW thermal input plants. The NFU is concerned that this new Directive will impact the agricultural sector especially glasshouse growers, grain drying and biomass boilers. This Directive has recently been proposed therefore there is plenty of opportunity to influence its scope however we need to gather evidence on this topic to provide a strong argument for any proposed changes.

### Key Information

Key features of the proposed MCP Directive are as follows:

Scope: **1 to 50 MW<sup>1</sup>** rated thermal input (RTI).

Pollutants measured: Nitrogen oxide (NO<sub>x</sub>), Sulphur dioxide (SO<sub>2</sub>) and particulate matter (PM).

Exclusions include:

- plants (including incineration plants) covered by the Industrial Emission Directive;
- plants covered by the "eco-design" Directive; and
- plants whose **combustion gases are used for direct heating, drying or other treatment.**

Registration, not permitting

Fixed emission limit values (ELVs)

Existing plant which do not operate more than **500 hours/year** may be exempt from ELV compliance

No derogations (other than short-term in circumstances where normal fuel supply is interrupted).

Triennial measurement of ELVs for plants in the 1 -20 MW RTI.

Annual measurement of ELVs for plants in the 20-50 MW RTI.

Environmental inspection system for MCPs to be set up, but no frequency specified.

The above exclusion states direct heating or drying but we believe many of the systems used operate indirect heating/drying using water or air therefore these may not be excluded. We are also unsure at this stage if aggregated thermal input for a site will be included.

Defra wants feedback on the proposal by **mid-February**. If you can provide any information regarding the following that would be extremely helpful to the success of our lobbying:

Do we have any information about plant performance, efficiency, capacity, fuel use, expected life-span and emissions?

If we do not have this information we also need to report this.

Should the 1MW threshold be higher and why? Will the 500hr/yr exemption be helpful?

Do we have examples of plants where we have doubts about the applicability of exclusion e.g. indirect heating systems?

Please also provide general comments and observations

<sup>1</sup> 1 MW = 3,412,142 BTU(British thermal units)/hour