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Ref: Medium Combustion Plant Directive

Contact: Martin Rogers
martin.rogers@nfu.org.uk

Tel: 024 7685 8645

Medium Combustion Plant Directive

Proposals

To provide an update on the proposals for a new Medium Combustion Plant Directive.

Introduction

The Medium Combustion Plant (MCP) Directive is designed to reduce emissions to the atmosphere and fill the regulatory gap between 1 to 50MW thermal input plants. It will impact on all combustions plants with any fuel source. We believe the proposed changes will impact upon the following groups:

- Intensive pig and poultry units for heating livestock buildings;
- Cereal growers using MCPs for grain drying;
- Salad growers using MCPs for greenhouse heating.
- Anaerobic digester plants.

In response to initial proposals, the NFU consulted with Defra and other trade associations to ensure that we provided a coherent response on behalf of the UK industry. However a recent report written by the European Commission's Environmental, Public Health and Food Safety committee (ENVI) has agreed with some of the strict stipulations which were placed in the initial proposals.

Key proposed changes for comment

Emission Limit values (ELVs)

The table overleaf compares the ELV's within current permits issued by the Environment Agency and those proposed under the MCP directive. **We believe these ELVs may have an impact on AD plant operators with a predominantly municipal waste feedstock** as these have greater SO₂ emission rates than AD plants with a purpose-grown energy crop feedstock.

We are concerned this will act as a disincentive for members who want to use waste within AD plants and believe that this goes back on EUs targets for waste reduction.

Emission Limit Values (mg/Nm3)	Sulphur Dioxide (SO ₂)	Nitrogen Oxides (Nox)	Particulate Matter (PM ₁₀)
Current Environment Agency Permits	350	500	No limit set
Medium Combustion Plant Directive proposals	200 or 35*	250	No Limit set
Medium Combustion Plant Directive proposals in areas which are failing EU air quality standards	35	120	No Limit Set

*200mg/Nm³ for combustion plants with net thermal input 1-5MW, 200mg/Nm² for those >5MW.

ELVs for combustion plants with other fuels sources vary and are outlined below:

Emission Limit Values (mg/Nm3)	Solid Biomass	Other Solid Fuels	Liquid fuels other than heavy fuel oil	Heavy fuel oil	natural gas
SO ₂	200	400	170	350	No limit
Nox	650	650	200	650	200
Particulate Matter	30	30	30	30	No limit

Timeframes for pre-existing plants:

The new directive currently stipulates that pre-existing **MCPs with a net thermal input between 15-50MW must be compliant** with this new directive (including the ELVs) **by 2020**. Those with thermal input **5-15MW must be compliant by 2022** and those with thermal input **<5MW must be compliant by 2027**.

We believe these timeframes are too short and do not consider the practical and financial implications on businesses that have to become compliant with the new rules. Where it is not possible or financially viable for alterations to occur, this legislation will require the use of the combustion plant to cease which will create unnecessary wastage of combustion and will also drive more operators using other, unsustainable, sources of fuel.

Differentiating the directive:

We believe it to be inappropriate for combustion plants with such a wide range of net thermal inputs (1-50MW) to be regulated under the same directive. The majority of combustion plants used within agriculture have thermal inputs between 1-5MW. Agricultural businesses are primarily SMEs and this directive will require them to face the same financial burdens to become compliant as large utility companies which operate combustion plants with a thermal inputs nearing 50MW

Aggregation:

This directive requires MCPs to be aggregated to calculate the total net thermal input. We believe that there should be no aggregation of standby combustion plants which will never be used simultaneously to the other(s). Instead we believe aggregation should calculate the 'maximum instantaneous input' rather than the capacity of plants used. We welcome any response from those who have standby generators.

What happens next?

This is our last opportunity to make changes to the directive before the committee meet again on 23rd June, please contact Martin Rogers at martin.rogers@nfu.org.uk if you have any responses by **Friday 19th June**.