



The European Association of Internal  
Combustion Engine Manufacturers

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## IPPC Directive Proposal: Industry Position of Cogen Europe and Euromot

Frankfurt and Brussels, Monday 15<sup>th</sup> September 2008

Dear Mr Kraemer,

Cogen Europe and Euromot represent the world leading manufacturers for stationary engines that are used for power production.

Cogen Europe and Euromot have already indicated in detail our concerns around the proposed new IPPC legislation<sup>1</sup> and summarise them here to clarify what can be a very detailed and technical discussion.

- The current IPPC Directive Proposal will harm the European Energy and Environmental goals for 2020. The proposed emission limit values will make it impossible to implement gas engines producing electricity and running with biogases. Thus the challenging CO<sub>2</sub> reductions expected from expansion in this sector will not be achieved.
- The poor application of the BAT principle resulting from the use of one blanket provision, for gas engines will result in unnecessary cost increases. These will handicap the development of engines on renewables, waste fuels and CHP ensuring that European ambitions to expand in these areas will not be met. One blanket provision ignores the different gas engine types, characteristics and range of gas fuels available or under development. Industry has highlighted this issue from the outset of the BAT/BREF process, and restates it here.

Cogen Europe and Euromot members acknowledge and support the need to continuously improve the emissions performance of our sector. The sector recognises the need to reduce its own emissions while providing technology to tackle the wider agenda of renewables deployment and energy efficiency. Our members believe that the current IPPC review proposal is a poor example of the IPPC principles in ignoring the "integrated" nature of the environmental and energy challenges in the diverse stationary gas engine sector. We commend the attached amendments to you, to redress the problem

Both Cogen Europe and Euromot are always available for any technical support.

Yours sincerely,

Dr Peter Scherm  
General Secretary Euromot

Dr Fiona Riddoch  
Managing Director Cogen Europe

1. Reference to existing Position Papers on IPPC (available at [www.cogeneurope.eu](http://www.cogeneurope.eu) and [www.euromot.org](http://www.euromot.org) ).

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