EUROMOT POSITION
4 April 2012

Comments on amendments to the 1999 Proto-
col to Abate Acidification, Eutrophication and
Ground-level Ozone (the Gothenburg protocol)

ECE/EB.AIR/2012/7 – 7 February 2012
Draft Revised Annex V
Chapter A, Paragraph 9 - Stationary Engines

We would like to ask the Secretariat of the Executive Body (EB) to accept an urgent
submission from the European IC Engine Industry associated in EUROMOT on a draft
amendment concerning gas-fuelled stationary engines as Informal Document.

In the last Executive Body Meeting in December 2011 (EB29) amongst all the interruptional
gas supply emission derogation flexibility for stationary engines was discussed. It was agreed
that this option should be restored, but this still seems not to be the case when studying
document ECE/EB.AIR/2012/7 of 7 February 2012.

We refer to page 8 of ECE/EB.AIR/2012/7 of 7 February 2012, section e/ :

\[e/ \text{A derogation from the obligation to comply with the emission limit values can be granted to combustion plants using gaseous fuel which have to resort exceptionally to the use of other fuels because of a sudden interruption in the supply of gas and for this reason would need to be equipped with a waste gas purification facility. The exception time period shall not exceed 10 days except where it is an overriding need to maintain energy supplies. - delete}]
The current version of the draft revised annex V allows under chapter A, paragraph 5 “Special provisions for combustion plants referred to in paragraph 6” to grant derogation from the obligation to comply with the ELVs provided for in paragraph 6 in the following case:

5.1 (a): For combustion plants normally using gaseous fuel which have to resort exceptionally the use of other fuels because of sudden interruption in the supply of gas and for this reason would need to be equipped with a waste gas purification facility;

Paragraph 6 is containing emission limits for “combustion plants”; stationary engines and combustion turbines are excluded from paragraph 6 and regulated in own paragraph 7 for combustion turbines and paragraph 9 for stationary engines.

We would like to renew our request initially formulated in the informal document no 7 of EB29 (page 4 - last paragraph) and kindly urge the Secretariat to include stationary engines in the derogation scheme for interruption of gaseous fuel supply and to restore the flexible mechanism for stationary engines under paragraph 9, note e/ by removing delete. This adds to the clarity of the section and ensures fair treatment of technologies.

Frankfurt/Main – 4 April 2012

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Working Group Stationary Engines
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