



cc PC

DN
I don't think we
need more to
fine tune the
agreement.
COP
7/11

FCS/86/259

SECRETARY OF STATE FOR THE ENVIRONMENT

Acid Rain: Draft EC Directive
on Large Combustion Plants

1. I have seen the exchange of minutes on this subject, resting with your letter of 6 November to Peter Walker.
2. We agreed in July that we should aim to use the UK Presidency to try to shift the terms of the debate on the draft large combustion plants directive in the UK's favour.
3. In September we took a decision to spend £600 million on retrofitting FGD. We must take the opportunity that gives us to put the discussion in the Community on to a new basis which reflects the real efforts we are making. We are all agreed that we must do so on a basis which does not involve additional costs above those already authorised.
4. The figures we should table have been discussed at official level and I understand that there is now agreement on the proposals which could be put forward without incurring the risks which others identified in relation to your earlier text.



5. In particular, it is agreed that:

- (a) we should not propose a 50 megawatt threshold;
- (b) the emission limit bands for new plant should be widened;
- (c) we should delete the illustrative figure of 20 per cent reductions for NOX;
- (d) we should set a figure of 1 million tonnes - not 1.1 million - for the reduction in SO2 emissions. To this must be added the safeguard clause proposed by you.

/ A copy of the revised proposal is attached.

6. We need now to proceed quickly with this proposal. The Commission have further ideas of their own, which will not be helpful to us. There is no doubt that a proposal on the lines agreed will be strongly criticised by those who want to aim for more stringent standards. But we shall have succeeded in altering the terms of the discussion, putting us in a position to make a particularly strong push towards agreement on new plant, while continuing discussion - on terms acceptable to us - on existing plants.

/7.

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7. I am copying this letter to the Prime Minister and members of E(A) and to Sir Robert Armstrong.

A handwritten signature in dark ink, appearing to be 'G. Howe', written in a cursive style.

(GEOFFREY HOWE)

Foreign and Commonwealth Office

7 November 1986

CONFIDENTIAL

CONTROL OF POLLUTION FROM LARGE COMBUSTION PLANTS

PROPOSAL BY THE PRESIDENCY

Basing itself on the Council declaration of 6 March 1986 and in the light of discussion at the June Council on the compromise presented by the Netherlands' Presidency, the Presidency proposes the following approach as a framework for further negotiations: that the Community should set new acid-free standards for future large combustion plants, and through this technology along with additional measures on existing plant, obtain a 60% reduction in SO² emissions, along with substantial reductions in NO_x.

NEW PLANT

1. There is now a wide measure of agreement within the Community that new large combustion plants should contain the most efficient, cost-effective pollution control equipment. Accordingly the Presidency proposes that:

a. All large combustion plants (above a threshold to be determined), authorised after /1 December 1987/, shall be required to meet maximum emission standards for SO² and NO_x related to the best available technology not involving excessive cost.

b. Discussions on the relevant emissions standards for the first stage (1987-1995) will begin immediately.

c. It is envisaged that the emission limits to be agreed for the first stage will be in the form of sliding scales in relation to plant capacity, and taking into account such factors as the relative cost of arrestment systems; fuel sulphur, nitrogen and ash contents; etc; and that the scales to be agreed will fall within the bands of table 1

d. Among the further issues to be addressed in the negotiations will be:

i. whether the threshold should be set at 50 or 100MW

ii. the consequences of substantial alteration of plant;

iii. the use of certain types of lignite;

iv. monitoring requirements.

e. For the second stage (after 1995) the Commission will present appropriate proposals, by 1990 at the latest, in the light of technological development.

REDUCTION OF SO²

2. Building on the proposals presented by the Netherlands Presidency, the Presidency proposes that the Council should decare, as an ultimate goal, a Community objective of an overall reduction of approximately 60% compared with 1980 levels of SO². With a view to achieving this the Presidency proposes:

- A first stage Community objective (up to 1995) of no less than a 30% reduction on 1980 levels
- A second stage Community objective (up to 2005) of a 45% reduction on 1980 levels.

3. Basing itself on the principles contained in the Council Declaration of 6 March together with the additional principle of comparable effort from each Member State added by the Netherlands Presidency proposal the Presidency proposes that:

a. First stage. The minimum required reduction in SO² emissions from large combustion plants by 1995 should be such as to reduce total national annual emissions, by comparison with 1980, by the amounts envisaged in the Netherlands Presidency proposal with the exception of Italy, UK and Spain for whom more stringent second stage reductions are required. The first stage figures would be:

	<u>10³ tonnes</u>
B	380
DK	216
F	1730
D	1600
GR	-
IRL	-
I	1140
L	-
NL	234
P	Increase of 80 allowed
E	150
UK	1000

EC	6370

First stage reductions as above would achieve a reduction of total Community SO² emissions from all

sources of some 31%. All existing national programmes for sulphur emission reduction should continue. Taking both Community and national target reductions together will enable the Council to declare that, as a Community, it confidently expects to achieve the target set by the Helsinki Protocol to the Geneva Convention on Long Range Transboundary Air Pollution (the "30% Club").

b. Second stage. Those Member States which have contributed less to the emission reduction in the first stage would be required to make more substantial reductions in the second stage (ie by 2005) with a view to achieving an overall Community reduction of about 45% (all sources) compared with 1980 levels. In order to avoid inequities arising because of the choice of 1980 as a base date, however, the Presidency proposes that the method of apportioning reductions between Member States should be related to per capita emissions. Allowing for the fact that some Member States expect to reduce emissions by more than 45%, the target for the other states, in order to achieve a Community reduction of 45% on 1980 levels would be 50 kilos SO² per-person per annum. To achieve such a target, taking into account the principles contained in the Council Declaration of 6 March, the second stage (assuming the additional first stage reductions foreseen under (a) are achieved) might be:

	<u>10³ tonnes</u>
B	-
DK	-
F	-
D	-
GR	-
IRL	42
I	380
L	-
NL	-
P	-
E	688
UK	870

EC	1980

c. Ultimate goal. The Council should declare as an ultimate goal, say by 2010, a Community reduction of approximately 60% (all sources) compared with 1980 levels. This would involve an emissions target of 30 kilos per person per annum or less.

4. Among further issues to be addressed in negotiations will be means to adjust these targets to account for future:

- i. Difficulties in the availability of certain fuels and plant types; and
- ii. Uncertainties in national energy forecasts.

REDUCTION OF NOx

5. The Presidency considers that reductions in NOx emissions from large combustion plant can be achieved in accordance with the principle of best available technology not involving excessive cost, through primary measures ie combustion modifications (in particular low-NOx burners) which are much cheaper than (secondary) flue gas treatment systems and better developed.

5. Accordingly the Presidency proposes that:

a. The Council should carry out urgent work in order to quantify the potential Community reduction in NOx emissions by 1995 using combustion modifications, and to allocate the reduction between the Member States; and

b. In good time before 1995 the Council will decide, on the basis of proposals to be prepared by the Commission in the light of the latest technological development and presented by 1990, further reductions in NOx emissions to be made in the second stage (1995-2005).

TABLE 1

Type of fuel	Rated thermal input (*) (MWth)	Emission limit values in mg/m ³ for:	
		Sulphur Emissions	Oxides of Nitrogen
Solid (coal)	700+	250-600	500-750
	100-700	Scaled accordingly(**) down to 2000	Scaled accordingly down to 800
Solid (lignite)	TO	BE	DETERMINED
Liquid	700+	300-600	450-750
	100-700	Scaled accordingly down to 2000	Scaled accordingly down to 800
Gaseous	All plant sizes	5-50 as a rule but 250-600 for coal derived gases	To be deter- mined

(*) net calorific value of fuel burned

(**) i.e. limit values to be decreased proportionately with increasing rated thermal input

ENV. AFFAIRS: Acid Rain: PES.