

# 2030 Winter Package

“pave the way for smart  
retirements?”

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# outdated & under-performing (coal) thermal generation on other pollutants (1/4)

- 54% of the EU coal-fired power stations not compliant with Industrial Emissions Directive (IED) Safety net limits (derogations to end mid 2020 / 2024)
- The revised LCP Best Available Techniques Reference Document (revised LCP BREF) sets binding environmental performance (air/water) for next decade with Environmental Quality Standards (EQS) applying on top ( ~2800 LCPs )
- 81% of EU coal-fired power stations are not compliant with the revised LCP BREF (upper limits) (2021: 111GWel out of 137GWel)
- bad net electrical efficiencies “performance”

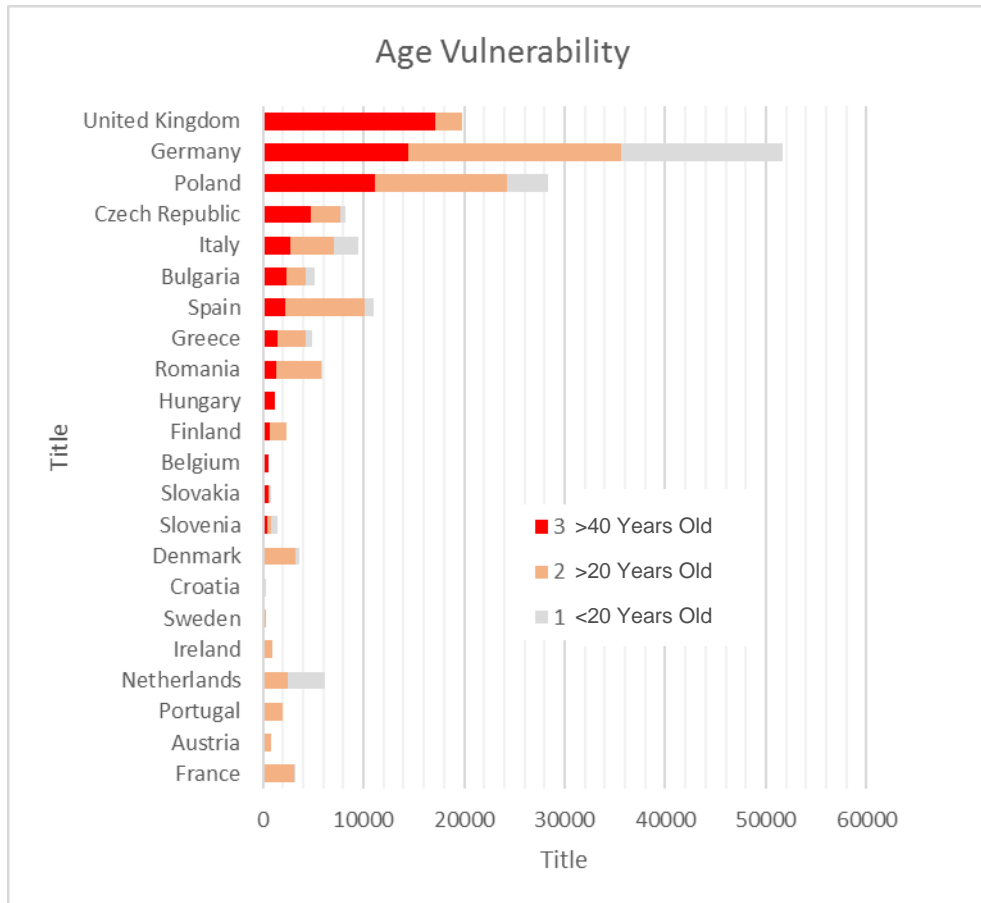
Fuel type	EU average	BAT
Lignite	35.4%	>42-44%
Hardcoal	37.8%	>45-46%

>1000MWthermal units baseload. Actual estimate from NGO/CAN-EU coal database



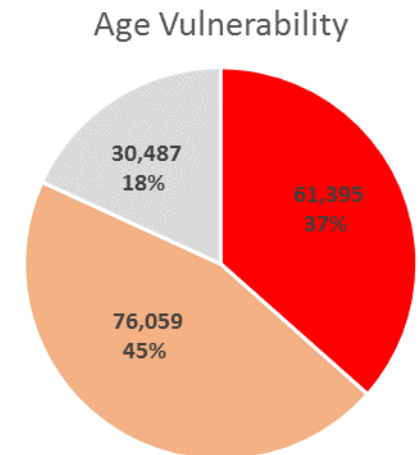
# outdated & under-performing (coal) thermal generation (2/4)

## Outlook: Age Profile (coal/lignite)



Total: 155 GWel

- Now: >37% over 40 years
- in 2021: > 74% over 30 years
- in 2030: >73% over 40 years!



# EU has outdated & under-performing (coal) thermal generation on other pollutants (3/4)

- Permit reviews and stricter national laws (EEB focus) **trigger investment decisions (2017-2021)**

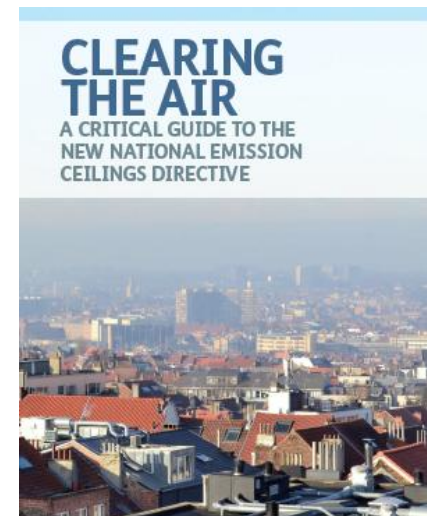
Fuel type	OPEX (M €/yr)	CAPEX M €
Hardcoal	1,321	8,617
Lignite	936	5,911

NOTE : lenient BAT range Source: ECF (DNV) study

- Member States need to develop National Air Pollution Control Programmes to meet 2030 NEC-D commitments

## Impact of Coal LCP retirement:

- BG, CZ, RO** meet immediately SO<sub>2</sub> NEC-D commitments
- DE, IT, PT, ES, SK, SL** significantly ease SO<sub>2</sub> NEC-D commitments (>60% cut)
- BG, CZ, POL** significantly ease NO<sub>x</sub> NEC-D commitments (>60% cut)



# The missing link (environmental & health impacts) (4/4)

Illustration 257 coal power plants only (43% of total fossil)	Premature deaths/year	Externalised costs in Billion €/year
Baseline (2013)	22,900	~33.3-63.2
BAT (lower range)	2,590 (56/day)	3.7 (154M/day)
BREF (upper range)	8,900	12.8-24.3



<http://www.eeb.org/index.cfm/death-ticker/>



**HEALTH AND ECONOMIC IMPLICATIONS OF ALTERNATIVE EMISSION LIMITS FOR COAL-FIRED POWER PLANTS IN THE EU**



## Conclusions (1/2)

- ❖ Intervention by 2020 is too late, by 2020 the damage is done and overcapacity of coal is continued
- ❖ **WARNING: Existing coal generation capacity is trying to receive money for retrofits to comply with 2021 IED-BAT norms to keep running**

Possible entry points 2030 WP (in particular Electricity Regulation):

- **Need for “performance based service delivery” principle** v. “technology neutrality” (fake and misused principle)
- **Require mandatory “transition plans” in European resource adequacy assessments (Art. 19) to organise replacement of unsustainable/unfit generation capacities & compability with *EU Environment protection acquis* (e.g. IED, NEC-D, EQS, SDGs, pre-conditionality of full implementation of RES-E and EE action plans/potential)**
- **Tighten significantly the Cap Payments provisions (Art. 23) to ensure coherence and synergies with climate ambition and *environment protection acquis* (priority for Energy conservation & RES-E, last choice combustion techniques with ‘state of the art’ standards e.g. 350g CO<sub>2</sub>eq/KWh, 60% net electrical efficiency and 85% net biomass fuel utilisation for CHP. Beyond BAT performance)**

## Conclusions (2/2)

### Other entry points (EU):

- **“market based approach” to not undermine “command and control / performance based approach”** (e.g. remove Art 9.2 of the IED, tighten EU safety net)
- Update the State Aid rules for environmental protection and energy (2014-2020)



### **Triple benefits of “transition plans / smart retirement”:**

- addressing climate imperatives
- high level of environmental / health protection
- set the path towards sustainable energy conservation & generation within the Energy Union

# Thank you for your attention !

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