



**To: Rt Hon Andrea Leadsom MP**  
Department of Environment, Food & Rural Affairs  
Nobel House  
17 Smith Square  
London SW1P 3JR

11 April 2017

**Cc Thérèse Coffey MP**

Dear Secretary of State,

**Subject: UK support for pollution controls on coal power plants**

The Industrial Emissions Directive ('IED') Article 75 Committee will meet on 28 April 2017 to vote on the adoption of the revised Best Available Techniques reference document ('BREF') for large combustion plants ('LCPs').

The UK Government's vote may well determine whether or not the measures will be adopted. It is essential that the UK Government votes in favour of the LCP BREF, for health and environmental reasons, and because it is in the UK's core national interests. A vote in favour of the LCP BREF would enhance the UK's reputation and strengthen its commitment in relation to reducing emissions from coal power plants that have such devastating effects on human health and the environment. A negative vote would contribute to the many thousands of premature deaths across the UK and Europe attributable to the existing weak regulation of emissions from coal and other large combustion plants.

We explain below in more detail why a favourable vote is critical, and ask that the Government responds to this letter to confirm that it intends to vote in favour of these important new standards.

## **Background**

The LCP BREF sets out standards for LCPs fuelled by coal, gas, biomass and diesel (amongst other fuels). These standards are reflected in the permits of LCPs, ensuring that operators are legally obliged to meet the BREF standards – including limits on toxic

pollutants such as nitrogen oxides, sulphur dioxide and particulate matter ('NO<sub>x</sub>', 'SO<sub>2</sub>' and 'PM').

The current version of the LCP BREF dates from 2006. Those standards are now weak and out of date given recent technological and environmental developments. The proposed new LCP BREF will set higher standards with significant health and environmental benefits across the UK and Europe. New LCP BREF standards should have been adopted in August 2014. They have already been delayed by almost three years. However, when finally adopted, the revised LCP BREF will come into effect in 2021.

### **Ensuring consistency with the UK Government's coal phase-out commitments**

The UK Government has committed to phase out coal from the UK's electricity generation mix by 2025, which we applaud (though we consider that this date should be brought forward somewhat). However, the Government's approach to the coal phase-out only tackles emissions of CO<sub>2</sub> – and only from the UK's coal power plants.

The revised LCP BREF sets standards for toxic pollutants such as NO<sub>x</sub>, SO<sub>2</sub> and PM that will reinforce the positive air quality effects of removing coal from the UK's generation mix. It will also extend these benefits beyond the scope of the coal phase-out plans by introducing appropriate environmental standards on LCPs that burn fuels other than coal. The UK Government has so far shown itself to be a global leader on phasing out coal-fired power generation as a cost-effective response to addressing the risks of dangerous climate change. It is in the UK's interests that other countries in Europe also accelerate similar actions to reduce coal use. Not only would this provide increased international influence but it would also reduce cross-border air pollution that directly impacts on the health of UK citizens.

Adoption of the new LCP BREF will provide a practical means of enabling other European countries to follow the UK's lead. It will strengthen the global drive towards the use of more efficient and cleaner electricity generation technology.

### **Protecting human health and the environment**

The vote takes place in the same week that the Government is due to publish its draft Air Quality Plan. The UK's previous 2015 Air Quality Plan stresses that EU-level agreement on environmental standards under the IED (which includes the LCP BREF) "ensures that there is continued improvement in the environmental performance of UK industries and a level playing field across the EU. The implementation of the IED will ensure that emissions from industrial sources continue to decrease."

The new LCP BREF will have a direct and very positive impact on air quality. Coal plants are responsible for around 23,000 premature deaths in Europe each year. The new LCP BREF will reduce the number of premature deaths caused by coal to approximately 8,900 deaths per year by mid-2021. It will also mean:

- 7,300 fewer new cases of chronic bronchitis,
- 336,500 fewer asthma symptom days for children,

- more than 4 million fewer working days lost through sickness, and
- an overall reduction in Europe's annual health bill as a result of coal-burning power plants from € 33.3 - €63.2bn to €12.8 - €24.3bn.

The new standards are currently the best prospect for bringing Europe's worst polluting LCPs under control.

Moreover, implementation of the revised LCP BREF will also help the UK meet its obligations under the National Emissions Ceiling Directive, for instance, to meet its 2030 SO<sub>2</sub> and NO<sub>x</sub> commitments. Failure to adopt the LCP BREF would show a lack of commitment and ambition as regards meeting these legally binding commitments.

A vote in favour of the LCP BREF will therefore have significant long term benefits for human health and the environment in the UK and across Europe.

### **The new standards were agreed at expert-level by consensus, based on objective technical data**

The new standards are based on 'tried-and-tested' technology, and objective technical data. This has allowed them to be agreed by a depoliticised consensus process involving industry, governments (including the UK) and NGOs.

The UK has participated fully in the negotiations and has been granted concessions where it has requested them. For example, the UK was granted a derogation allowing its coal plants to avoid costly investments if they do not operate more than 1500 hours per year, and granting it considerable flexibility when deciding on the timing of reviewing their permits in light of the Government's coal phase-out plans.

These concessions have significantly reduced the environmental obligations faced by the UK's LCPs to the detriment of human health and the environment. However, having secured these changes it would be completely inappropriate for the UK to fail to vote in favour of the BREF. A failure to agree the BREF would have severe impacts on human health and the environment in the UK and beyond.

### **Conclusion**

To date, the UK's approach to the LCP BREF, as with its approach to air pollution more generally, has not matched the levels of positive intent shown by the Government's domestic coal phase-out policy.

However, the UK has committed to playing a full role in the EU until such time as its membership formally lapses at the end of the Article 50 process. The Government should use this opportunity to vote in favour of a measure that will have significant health and environmental benefits across the EU, strengthening the UK's reputation as a leader in relation to reducing pollution from coal power plants.

We request that you please respond as soon as possible prior to the vote to confirm how the UK's representative has been instructed to vote at the meeting of the IED Article 75 Committee on 28 April 2017.

In addition, we would like to discuss these matters further, either in person, by email or by phone. Our contact details are in our signatures below.

Yours sincerely,



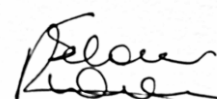
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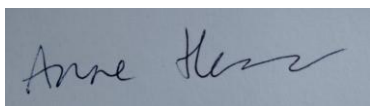
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