FEDIL

Position

NATIONAL AIR POLLUTION CONTROL PLAN

FEDIL welcomes that the emission reduction projections presented in the NAPCP for industry-relevant areas (i.e. SOx, COV) are primarily based on voluntary measures defined in consensus with the concerned companies during the elaboration phase of the NAPCP. FEDIL believes, that emission reductions should be realised in the most cost-effective manner, which may be achieved by designing measures targeted towards the leading emitter for each of the different air pollutants. Furhter, the financial incentives should be tailored to support the challenges of reaching the NEC objectives.

However, it should be clear that the objectives of the NEC directive can have a significant impact on the development of Luxembourg's industry as the NAPCP projections for 4 of the 5 air pollutants leave little room to the 2030 NEC objectives (<5% margin). And the NAPCP projections are already based on the inclusion of the ambitious NECP (National Energy and Climate Pan) projections.

The NAPCP will frame the development of Luxembourg's industry as an industrial large scale project or the arrival of a larger industrial company can have a significant impact on the achievement of the NEC objectives.

It is therefore important for FEDIL to leave a certain flexibility when assessing the « NAPCP conformity » of an industrial project and that the dynamics in industry is reflected in the application of the NAPCP on political level.

In case of extensions of existing industrial sites or implantations of new industries, policy makers should not only reason in absolute terms with regards to the objectives and the underlying trajectory but also take into account the « dynamic » factor by applying a flexibility mechanism allowing to leave a certain margin to the targets and the underlying trajectory.

Finally, FEDIL believes that the need for additional flexibility in industry-relevant areas should be reflected in coming legislative proposals related to air pollution.

Click here to read the full position document