

## **LPG industry position paper on the proposal for a Regulation on emission limits and type-approval for non-road mobile machinery (NRMM)**

**AEGPL, The European LPG Association,** wishes to reiterate its strong support for the European Union's attempt to reduce emissions in the transport sector, and to extend this in particular to non-road mobile machinery. We also welcome this proposal as a supportive measure to the further introduction of alternative fuels for engines in the sectors outside of road transport. This sector is currently largely dominated by conventional fuels (diesel and petrol) while a larger use of alternative fuels such as LPG – for which the technology is directly available and cost competitive - could bring significant benefits in terms of GHG and pollutant emissions.

The introduction of Emissions Stage V, thus aligning the requirements with those of other sectors (e. g. road and marine) will facilitate the transition to cleaner fuels. It will also give European engine manufacturers the opportunity to introduce their cutting edge technologies such as dual fuel – i.e. the simultaneous combustion of diesel and LPG - that can further help reduce NO<sub>x</sub> and particulate emissions.

AEGPL believes that the Regulation proposal sends the appropriate signal in favour of a transition to cleaner fuels, which could be achieved in a reasonably quick time, wherever product cycles and life expectancy of each unit of equipment are short. Some of the equipment addressed in this Regulation, however, exhibits extremely long life expectancies, which means that the expected effect of this Regulation on the emissions of those sectors would be very limited in the short to medium term. Under consideration of cost-effectiveness and aiming for more immediate results for this kind of machinery, AEGPL suggests to include provisions encouraging Member States to implement measures in favour of the retrofitting of existing equipment having a very long life expectancy.

More specifically:

- AEGPL welcomes the introduction of alternative fuels in Article 24.2 of the Regulation in a specific listing, which rightly includes LPG among others. This approach is in line with Directive 2014/94/EU on the deployment of alternative fuels infrastructure as well as with the recent amendment of Directive 96/53/EC on maximum weight and dimensions of road vehicles and rightly underscores a technology neutral approach.
- AEGPL welcomes the effort made in the draft revision to make the overall level of requirements more stringent than in the currently in force Directive:
  - The inclusion of all power ranges provides a level playing field for all fuels and power ranges and prevents operators evading to non-regulated power ranges.
  - Fine particles and NO<sub>x</sub> pose a serious risk to human health, especially in urban areas, and have for this reason been limited in mass and in number for road transport. The focus on the reduction of particle mass has led to the reduction in particle size towards more dangerous inclusion of smaller particles. The introduction in the Regulation proposal of

new requirements limiting the total number of particles for NRMM is therefore a very positive move.

- AEGPL welcomes the inclusion in the draft Regulation of dual fuel engines and specific provisions to encourage their use. This will give manufacturers the possibility to introduce technologies established in other sectors (road transport in particular) also for the range of engines covered in this Regulation. Experience has shown that this technology holds great emissions savings potential.
- AEGPL would like to suggest the introduction of provisions enabling and encouraging Member States to introduce measures to support the retrofitting of engines with long life expectancy and subsequent long replacement cycles with after-treatment or dual fuel systems. This would enable emissions from engines of that class to be reduced in a cost-effective manner in a shorter period of time. Despite the proposed Regulation being a technical document addressing the type approval of engines dealing solely with emissions requirements for new engines and related administrative processes, similar pieces of legislation, namely Regulations (EC) No. 595/2009 (Euro VI) respective No. 715/2007 (Euro 5-6) include such provisions addressing financial incentives for retrofitting.

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#### **About AEGPL (The European LPG Association)**

*AEGPL is the sole representative of the LPG industry at European level, representing national LPG Associations as well as distributors and equipment manufacturers from across Europe. Our mission is to engage with EU decision-makers and the wider policy community in order to optimise the contribution that LPG - as a clean and immediately available energy source - can make to meeting Europe's energy and environmental challenges*