

Call for evidence - IED Transformation plans

AECC input – 14 March 2025

The Association for Emissions Control and Climate ([AECC](#)) appreciates the opportunity to contribute to the European Commission's call for evidence on the transformation of industrial installations under the Industrial Emissions Directive (IED 2.0).

AECC, building upon the expertise of accessa, represents companies that develop and deploy advanced emissions control technologies, which are critical for achieving deep industrial transformation. AECC members provide state-of-the-art emissions control solutions that will be essential for achieving the goals of IED 2.0, including decarbonization, depollution, and circularity. Oxidation Catalysts, Selective Catalytic Reduction (SCR) and Catalytic Particulate Filters (CPF) are already in the market to reduce NO_x, CO, VOCs, NH₃ and particulates of industrial installations. But technologies are available to do more than what is currently required.

Regarding decarbonisation and transformation plans, AECC believes there is not enough focus on other Greenhouse Gases than CO₂. Methane (CH₄) and nitrous oxide (N₂O) have significantly higher global warming potentials (GWPs) than CO₂. Commonly used 100-year values are 28 for CH₄ and 298 for N₂O. Higher focus is especially needed for CH₄, as recently reported by the [EEA](#): “while methane emissions from Europe are reducing, global methane emissions and their contribution to global warming are increasing.” The commonly used 100-year value furthermore underestimates its impact in the shorter timeframe. Its impact is far more severe over 20 years, with a GWP exceeding 80. This highlights the **urgent need to address CH₄, and N₂O, emissions alongside CO₂**, as reducing these potent greenhouse gases can have a much faster and stronger effect in slowing global temperature rise.

Methane abatement technologies have been the focus of extensive research for decades, with promising solutions developed across various sectors, including energy, agriculture, and waste management. Technologies such as catalytic methane oxidation have demonstrated significant potential to reduce emissions. However, despite their technical viability, **market deployment remains limited due to a lack of strong incentives**, regulatory requirements, and financial support. Unlike CO₂, which is widely included in carbon pricing and emission trading schemes, methane often lacks sufficient economic drivers to encourage large-scale adoption of abatement technologies. The short atmospheric lifetime of methane means that reducing emissions today can have immediate climate benefits, yet without targeted policies, subsidies, or carbon credits for methane reduction, industries have little motivation to invest in these solutions. Bridging this gap requires policy intervention that properly values methane reduction as a critical step in mitigating near-term global warming.

Low sulfur content in gas quality standards is an **essential enabler** for the effective operation and longevity of methane oxidation catalysts. Sulfur compounds act as poisons to catalytic surfaces, significantly reducing their efficiency in oxidising methane. Over time, sulfur accumulation deactivates the catalyst by blocking active sites, leading to reduced methane conversion rates and increased maintenance costs. Ensuring strict sulfur limits in gas quality standards helps maintain high catalyst performance, prolongs operational life, and enables more reliable methane mitigation. Without proper sulfur control, methane oxidation technologies cannot achieve their full potential, limiting their role in reducing the short-term climate impact of methane emissions. It is therefore extremely worrying to learn that the sulfur content of the gas quality standard is considered to be increased from 10 mg/m³ to 30 mg/m³.

Focusing solely on the end goal of net-zero emissions risks overlooking the significant climate impact of emissions released during the transition. Every ton of greenhouse gases emitted into the atmosphere contributes to cumulative warming, meaning that even temporary increases in emissions can have long-lasting consequences. The example of short-lived climate pollutants like methane (CH₄) and nitrous oxide (N₂O) have already been addressed above. But additionally, **policies** and strategies should **prioritise reducing all emissions at every stage of the transition, ensuring continuous progress** rather than relying only on solutions to meet distant net-zero targets.

AECC and its members are committed to supporting the European Commission's efforts in achieving the IED 2.0 objectives. We welcome the opportunity for further collaboration and are available for discussions, workshops, and consultations to provide additional technical insights. Please do not hesitate to contact us for any further information.

About Us

The **Association for Emissions Control and Climate** (AECC) is the international, Brussels-based association of European companies operating worldwide in the research, development, testing and manufacture of key sustainable



technologies for mobile and stationary applications. Our membership includes [Emitec Technologies](#), [Johnson Matthey](#), [NGK Europe](#), [Umicore](#), [BASF ECMS](#) and [W.L. GORE](#).

We have a strong and focused European footprint across our members – employing around 22,500 skilled people in Europe across 46 production sites and 19 research and development (R&D) technical sites. We are present in 8 Member States in the European Union.

AECC members' emission control technologies are integrated into the exhaust systems of cars, commercial vehicles, buses, motorcycles, construction equipment and industrial installations in Europe. We work with OEMs and other industry stakeholders, providing innovative technological solutions to the pollutant problem that we see today.

AECC supports the European Commission's long-term ambition for zero pollution and increased greenhouse gas emission reductions. Clean air and greenhouse gas reduction are priorities for all of us.

AECC is registered in the EU Transparency Register under n° 78711786419-61.

Should you need more information, you can contact AECC at info@aecc.eu.

