

Northern Macedonia adopted the NERP in 2017 without public consultation or strategic environmental assessment. All eight existing large combustion plants from the energy sector are included. Of these, three have not been operational since the entry into force of the NERP, and two gas heating plants have already been in line with the 2017 LCP BREF. Thus, the Bitola and Oslomej coal-fired power plants are the only large combustion plants that are relevant for compliance with the NERP, and also the only ones that were required to install pollution control equipment. However, they did not do that and for the third year in a row, they are breaking through the national ceilings of CO<sub>2</sub> and dust.

As in 2019, reported emissions in 2020 again show extremely high levels of SO<sub>2</sub>. Three large coal-fired plants emitted 86,700 tons of SO<sub>2</sub>, which is almost 5.5 times more than the national ceiling of 15,855 tons.

The two groups of the Bitola power plant, B1 + B2 (60,422 tons) and Bitola B3 (24,091 tons), remain the largest source of SO<sub>2</sub> emissions in the country. Emissions were slightly lower than in 2019, but that was only due to fewer working hours. The emission of 60,422 tons from Bitola B1 + B2 is again among the highest in the region and it is over nine times higher than the individual ceiling of the plant of 6,585 tons. Bitola B3 emissions are also 8.5 times higher than the single ceiling of 2,859 tons.

Oslomej's contribution is only 2,164 tons of SO<sub>2</sub>, which is half of the individual ceiling, but all these emissions were released during the two winter months when the plant was in operation.

Dust emissions in 2020 remained at almost the same level as in 2018 and 2019, still more than twice as high as the national ceiling. The Bitola B1 + B2 group was the largest emitter, with 2,688 tons of dust - breaking through the national ceiling of 1,736 tons. Bitola B3 added 784 tons, and Oslomej 212 tons of dust emissions.

Coal-fired power plants emitted 4,057 tons of NO<sub>x</sub>, which is significantly lower than the unrealistically high national ceiling. These emissions are even lower than the upper limit for 2027 of 6,179 tons, which will be in force at the end of the NERP period. Unit 1 of the Bitola power plant has not yet been overhauled in order to reduce NO<sub>x</sub> emissions, and this installation of the ceiling allows it to remain in compliance with the LCPD even after 2027.

The goal is to bring all power plants individually in line with Annex V of the Industrial Emissions Directive after 2027. , and this upper limit is not in line with that goal.

TPP Bitola is one of the most dangerous power plants in the region in terms of health impacts. Had it complied with the emission ceilings, almost 300 deaths in Northern Macedonia and other countries in 2020 would have been avoided.

## **Current investments**

In 2019, the tender for the reconstruction of electrostatic precipitators in TPP Bitolj was canceled, and unsuccessful public consultations on the integrated permit for pollution prevention and control (IPPC) for the plant were held. At the time of writing, in June 2021, the permit was still not issued. Since 2019, there has been no effort to improve pollution control in coal-fired power plants. The main reason for that is the uncertainty about their future, which stems from several strategic preparations from mid-2019 to June 2021. The 2020-2040 energy strategy, adopted by the government in December 2019, introduced problematic access to coal-fired power plants. The investment needed to bring the plant into line with environmental regulations was an option that depended on the chosen scenario, which in theory made sense, but only if the government would quickly make a concrete decision to follow a certain scenario.

The Oslomej plant would be shut down in all scenarios, but Bitola would continue to operate according to the reference scenario of the Strategy and would be put out of operation due to the introduction of a CO<sub>2</sub> tax in the moderate transition and green scenario. Consequently, pollution control investments are considered only in the reference scenario and are excluded in the moderate transition and green scenario, as it is considered not to be financially viable.

This approach was then reflected in the National Energy and Climate Plan and the Energy Strategy Implementation Program. These documents further developed the green scenario as the cheapest and least harmful to the environment and recommended that Oslomej be shut down in 2021 and TPP Bitola in 2027. However, this means that Bitola was given the green light to operate without pollution control for the next six years, thus avoiding compliance with environmental regulations as long as it is planned for decommissioning. Approving such violations not only exacerbates the health effects of coal, but also allows for strategic planning of the energy sector so as to circumvent environmental legislation, setting a dangerous precedent for future strategies. The country's coal-fired plants are already allowed to operate illegally, without IPPC permits and without meeting basic environmental requirements, such as continuous monitoring of emissions, and this approach implicitly approves of their illegal operation.

The phasing out of the Bitola power plant is also linked to a number of preconditions, such as the introduction of a CO<sub>2</sub> tax and the construction of several larger gas and hydropower capacities that will replace Bitola's role in the energy sector. This may cause further delay in closing. The six-year period could be extended, causing several more years of work harmful to the environment.



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consultation

Source: [bankwatch.org](http://bankwatch.org)