

Comments from	No.	BREF reference						Comment	Your proposal for modification	Rationale / supporting data
		Ch.	Section				Page			
FEAD	1	Scope					xvii	First bullet The document is supposed to cover industrial sectors which use or produce energy. But, it is not the case. Most of what is said in the document refers to production processes exclusively. Most of what is said is not written for energy production processes	After "industrial sectors which use or produce energy and apply generic techniques which are possible to transfer to other sectors are covered", add "However most of what is said is mainly orientated to processes producing products. When made available in	The treated scope must be honestly described in order not to mislead the reader who could try to apply statements out of purpose.
FEAD	2						xvii	Fourth bullet The major question of renewable fuels cannot just be discarded in one line as it is. Especially when the efficiencies given in example are for gas fueled plants !	"it does not respond to fuel specific (e.g. bio, fossil, waste) issues", add "and therefore does not address at all the major question of renewable fuels. Obviously this question often supersedes the simple question of efficiency."	Gas fuel plants are usually very efficient but in terms of resource saving, burning gas is most often among the worst options. This must be made clear somewhere.
FEAD	3	Scope					xviii	Last bullet Most of what is said in this BREF is not related or relevant for incinerators, e.g. the BREF focuses on production processes. See p. 28 and 29 where only production processes are taken into consideration)	In the last bullet, after "For example, it exists a BREF on Large Combustion Plants where energy efficiency is also covered." add " And the BREF on Incineration deals with the specificities of this activity in respect of energy efficiency."	Many things said in this BREF are said for processes which are very different from incineration which could mislead the reader. E.g. in general the goal is to minimise the energy consumption in order to manufacture a product or to achieve something. In the
FEAD	4	1					1	General features on energy This chapter gives interesting general information on Energy and Thermodynamics. In particular a great number of equations and formulas are given. They are probably right in general but we cannot afford to check them all and to check that they cover every	At the end of the first paragraph of Chapter 1 p. 1, after "There is a lot of generic information on Thermodynamics available in the general literature, add : "The following pages are given as an example to illustrate basics of energy and Thermodynamics	We must avoid that anybody contest any other approach of thermodynamics or any other equation/formula because not strictly mentioned or presented as in the BREF. And again, this presentation and these equations/formula have probably not been really check
FEAD	5	1	2 to 5					Principles of thermodynamics etc. Interesting and probably right in general but not checked and certainly not the unique way of doing	Move all of this to an annex and state clearly that this is a presentation among other possible ones.	This must not be THE Reference
FEAD	6	1	5				16	Identification of inefficiencies The word "inefficiencies" is inadequate	Replace "inefficiencies" by "irreversibilities" in the heading and in the text.	Will mislead any non specialist reader.
FEAD	7	2	3	2	4		43	Primary energy conversion factor for electricity Given figures are misleading : a) the efficiencies given are for gas powered elec. stations using combined cycle technology (Eff. 55%) or the most efficient CHPs (Eff. 85%). This must not be presented as the standard situation. Power plants efficiency is	After "With CHP it is possible to reach 85% efficiency" add "in some optimal circumstances, when heat can be used at very low characteristics. However, the average efficiencies of power plants in Europe are much lower, around 30 to 38%. The efficiency dep	We must not put wrong figures in the mind of the reader who will consider as basic standards these very high efficiencies given in example and will require them in every circumstances
FEAD	8	3					55	Energy management in industrial installations There is no information on the existing situation. This chapter is supposed to give typical performances.	Give information on the efficiencies encountered in the different fields, on the parameters influencing the efficiency and in the possible cross media effects (efficiency is often decreased by more environmentally friendly processes). States clearly that	Essential. Especially when elsewhere in the document figures are given for "standard" efficiencies and possible improvement. If data not available, it must be clearly said and every figures elsewhere must be deleted.
FEAD	9	4	2	3			111 to	HiTAC process	DELETE	The BREF must not be turned into an advertising format
FEAD	10	4	3	2			117	4.3.2 Measures to improve steam system performance "various energy efficiency measures already done show that average saving of 7% are possible ". This is meaningless. It depends on the process and the starting point.	Do not put any data	Give an average value is not possible and representative
FEAD	11	5					213	Best Practices. 6th paragraph. In order to determine the BEST practice, it is necessary to compare the different possibilities and when they are supposed to be GENERIC, this must be done for all covered activities. This is a very huge work which has obviously not been done. Therefore i	Replace "best" by "good" everywhere : "In this document 'good practices are determined. It should be stressed that these 'good practices' can be used to derived 'best available techniques' in the different IPPC sectors (...)"	At the KO meeting, we had agreed not to propose BATS but GOOD PRACTICES and certainly not BEST practices, which in such a wide field is just meaningless.

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FEAD	12	5					213	Best Practices. Last but one paragraph.	The BREF is far from being complete on an IPPC point of view.	After "Best Practices have been assessed according to the definition of BAT - Article 2(11)", add "with the restrictions given in particular in the Scope, e.g. the BREF does not address the question of resource saving (Renewable-Fossil fuels) or the quest	It is essential that a warning is given here clarifying that the BREF is only addressing a part of the overall integrated approach.
FEAD	13	5					213	Best Practices. Last but one paragraph.	Nobody has checked the validity for all sectors of what is said in this Chapter. Moreover, as already said the BREF is mainly orientated to Production of products.	After "These techniques have been derived from many industrial sectors" add "(mainly in the production of products processes)", then after "and are considered to be generally applicable", add "(subject to a checking of the applicability for the particular	It is essential that a warning is given here clarifying that the BREF is only addressing a part of the overall integrated approach.
FEAD	14	5	1				214	Generic Best Practices. 2nd paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Use the same wording as in § 5.4 : replace "(...) best practice is to :" by "the following best practices can be applied in several sectors" or better by "the following good practices can be applied in several sectors"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	15	5	2				214	Energy efficiency indicators. 2nd paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Use the same wording as in § 5.4 : replace "(...) best practice is to :" by "the following best practices can be applied in several sectors" or better by "the following good practices can be applied in several sectors"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	16	5	3				215	Energy management structure and tools. 2nd paragraph & 5th paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Use the same wording as in § 5.4 : replace "(...) best practice is to :" by "the following best practices can be applied in several sectors" or better by "the following good practices can be applied in several sectors"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	17	5	4	1			216	Combustion. 2nd paragraph	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	18	5	4	2			217	Steam systems. 2nd paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	19	5	4	2			217	Steam systems. 5th paragraph.	Typical example of a wrong statement. Reducing the blowdown is a BAD practice if the water is not clean enough !!!	Before "minimising blowdown" add "take the appropriate measures if any to allow minimising blowdown"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	20	5	4	3			217	Cogeneration. 2nd paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	21	5	4	4			218	Heat recovery. 1st paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	22	5	4	5			218	Electric motor drive systems. 2nd paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	23	5	4	6			219	Compressed air system. 1st paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	24	5	4	7			219	Pumping system. 1st paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	25	5	4	8			219	Drying system. 1st paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.
FEAD	26	5	4	8			219	Transport system. 1st paragraph.	How can we pretend that this is THE BEST PRACTICE in EVERY CASE? It is not even possible to pretend that it has been checked.	Replace "(...) best practice is to :" by "good practices are"	We must be credible. At the KO meeting , it was agreed to give good practice but NOT BEST practice which is meaningless.