

Dear SET Plan Secretariat colleagues

Please find detailed below, some initial comments from our UK stakeholders on the Issues Paper we received for SET Plan Action 6:

- Waste heat (low grade) - Yes, there is a lot of it, but using it is not cost effective for industry, though it is cost effective for countries that can use it for other purposes such as district heating. Is this really an “industrial energy efficiency” issue, or more relevant at a national level to reduce fuel imports?
- Materials Efficiency - Perhaps the best way to reduce energy consumption is to make less product. But this effect is not seen in the EE metrics in the paper – one needs different metrics to capture this effect in order to drive the goals being sought. See Allwood’s work <http://www.withbotheyesopen.com/read.php?c=20>
- Are there some missing technologies – for example use of low-grade heat plus vacuum for drying. Enables the use of otherwise wasted heat; and membrane technologies for all separation processes (chemical and refining).
- Iron & Steel – Should Europe should be aiming to produce iron anymore? Few places in Europe have the scale to compete globally. Perhaps Europe should move up the value chain to processing scrap and imported iron. If we develop those low-carbon iron refining processes, the full scale plants are perhaps now unlikely to be built in the EU anyway?
- On classification – Should LNG importing plant be classified as a “petroleum refinery”? Isn’t it better classified as part of the gas network? This seems to be a distorting classification.
- It’s not clear what the weightings are between each metric when assessing what sectors are a priority. It seems there is a greater weighting on ‘EE Technical Potential’ given the proposed 3 industry-sub sectors selected. The metrics are listed, but the criteria for selecting sectors is not clear (e.g. how are sectors reduced down to 3). Why are only 3 sectors chosen?
- Related to the bullet above, though these sectors have the largest maximum technical potential, the barriers to unlocking these might be much greater than for sectors that have less maximum technical potential. So, broadly, there’s no consideration of relative difficulty of achieving near to the maximum technical potential across sectors.
- What does the red font symbolise in the table?
- The paper seems generally restricted to energy efficiency, whereas we would prefer a decarbonisation approach to take into account and specifically include fuel switching and industrial CCS.
- There’s no systematic list of deployment dates – We think there needs to be a sensible spread of near term and longer term technologies here. Could TRL data be added before circulating further, or a suggested deployment date?
- On the targets, we think that the indicators and targets should be in terms of carbon saving rather than energy saving. The target baseline year should also be stated.

I hope that these comments will be helpful in developing our collective thinking.

Best wishes

UK delegate to SET Plan Steering Group