



British Cement Association
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BCA Response to PIU Scoping Note on Energy Policy

The British Cement Association is the trade and research organisation that represents the interests of the United Kingdom's cement industry in its relations with Her Majesty's Government, the European Union and relevant organisations in the United Kingdom. The members of the BCA (Blue Circle, Buxton Lime Industries, Castle Cement and Rugby Cement) are the major domestic manufacturers of Portland Cement producing over 90% of the cement sold in the UK.

Our comments on the PIU Scoping Note on Energy Policy can be found below.

Alternative Fuels

The Cement Industry is seeking to use more alternative fuels, such as tyres, packaging waste, and substitute liquid fuel, in its kilns. These fuels act as a substitute for coal or petcoke with current usage broadly equivalent to 100,000 tonnes of coal a year.

Energy recovery from alternative fuels in cement kilns delivers the following benefits;

- Reducing the environmental impact of cement works
- Helping solve a disposal problem
- Conserving fossil fuels for future generations
- Delivering a reduction in green house gas emissions committed by the UK cement industry in its Climate Change Levy agreement with Government

Technically, the industry has the potential to more than double its use of these fuels. However, it faces a number of difficulties in their introduction, which fall within the remit of the scoping note. We believe the review of Energy Policy should examine the regulatory barriers to the introduction of alternative fuels and would welcome the opportunity to discuss our concerns with the Performance and Innovation Unit in greater detail.

The Environment Agency recommended in its "Tyres in the Environment Report" that, "from an environmental viewpoint cement kilns are a good option for the energy recovery of used tyres." Furthermore, the Government-sponsored Used Tyre Working Group has recently published a report encouraging the use of tyres in cement kilns. This report noted that, "...the Agency has an active role to play by easing some of the pressures by ensuring an efficient authorisation process for the use of tyres in cement kilns."

The industry was therefore disappointed that the Agency's draft Tyre Fuel Protocol provides for only limited improvements for the introduction of this alternative fuel. A copy of the BCA response to the draft protocol is attached.

Meanwhile, the industry continues to experience serious delays in obtaining authorisation and is forced to undergo lengthy and costly trials.

Energy Prices

Your comments on environmental policy objectives pointing, "*strongly to internalising the environmental costs of fossil fuel consumption through higher energy prices. This would provide price signals that encouraged economy in fossil fuel consumption and the switch to alternative, cleaner fuels etc*" causes us some concern.

The cement manufacturing process is a mineralogical transformation process in which cement clinker, for the most part calcium silicates, is produced from a mixture of raw materials, limestone, chalk and clay or their naturally occurring minerals.

The cement-making process is carried out at high temperatures – materials temperatures are up to 1500 °C, and gas temperatures up to 2000 °C – and the materials' residence time within the kiln is approximately 30 minutes. The temperature at which cement manufacture is carried out is determined by thermodynamic and kinetic considerations, which by their nature are a function of physico-chemical parameters over which the operator can have no influence.

The cement production process is energy intensive, and typically energy represents 35% of the total production costs. European data indicates that over the past two decades, energy consumption within the kiln [excluding electrical energy] has been reduced by 21.7%. Additional energy efficiency improvements will be introduced under the Negotiated Agreement between the UK Government and BCA. This constitutes a contribution to the Climate Change Levy scheme, and over the period 1990 to 2010, an energy saving of 25.6% will be achieved [for all process energy]. Further increases in energy costs are unnecessary and saddle the industry with unavoidable costs that reduce competitiveness.

Other

Clearly competitive energy markets, diversity and security of supply are important to the UK as a whole and we look forward to commenting on more detailed proposals at a future date.