

**Organisation:**

Hutnicza Izba Przemysłowo-Handlowa  
Polish Steel Association  
ul. Lompy 14  
Katowice 40-040  
Poland

**Contribution:**

In response to the announced consultations on a proposal to amend the regulation (EU) No. 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty, we apply for complementing the scope of permissible aid for energy efficiency improvement in the field of horizontal aid for environmental protection with inclusion of investments related to improvement of the energy efficiency of production processes by using post-process heat by way of its recovery and re-circulation to the production process, after transformation of the heat into energy suitable for the process.

The approach to the energy efficiency should not be confined to the notion of the energy consumption and the amount of energy saved by introduction of measures reducing energy intensity, but it should also include the solutions in terms of improvement of the energy efficiency and economic viability of the entire productions process by means of the more effective use of energy, especially waste energy management after its transformation. It is of particular significance for the implementation of pro-environmental solutions in highly energy-intensive metallurgical processes, e.g., at ferroalloys production, where, due to technological limitations, there is no possibility to re-circulate the recovered heat to the manufacturing process, however it may be used by means of transformation into energy that is consumed by the process in large amounts.

The outcome of the implementation of such solutions is the reduction in consumption of final energy supplied to the metallurgy, and, as a consequence, also the primary energy consumption reduction, what translates into direct environmental benefits, such as, among others, reduction of CO<sub>2</sub> emission. Investments in highly efficient systems for heat recovery and transformation into energy, realised on such a large scale in companies of the metallurgy sector, are projects requiring allocation of enormous financial resources. Neither market mechanisms nor financial tools provide a funding for this type of projects due to a financing gap, therefore such implementation is possible only by deploying funds constituting the aid governed by the Regulation referred to at the beginning hereof.