

## Template for comments and secretariat observations

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1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
GE	7. Classification	Table 1	ge	Mean (!) net calorific value, class 5: NCV ≥ 3 MJ/kg (ar)	<p>Autothermic combustion starts at NCV ≥ 6 MJ/kg (ar). Materials with NCV below this level do not contribute to energy recovery, so they are neither fuels nor solid recovered <b>fuels</b>.</p> <p>Application of these materials as aggregates in cement kilns is out of scope of SRF.</p>	
GE	7. Classification	Table 1	ge	Mean (!) chlorine content, class 5: ≤ 3 % (d.s.)	<p>Materials containing up to 3 % chlorine <b>on average</b> require appropriate APC techniques in order to minimize HCl-, PCDD/F- and other POP-emissions.</p> <p>These techniques are usual for MSW and hazardous waste incineration plants, but they are not standard at production plants using SRF.</p>	
GE	7. Classification	Table 1	ge	<p>Limitation of mercury für classification:</p> <p>Median (!): ≤ 0,5 mg/MJ (ar)</p> <p>80<sup>th</sup> percentile: ≤ 1 mg/MJ (ar)</p>	<p>The limitations of mercury with reference to NCV (class 1 to 4) allow up to 5 (median, class 4) reps. 25 (80<sup>th</sup> percentile, class 1) mg Hg/kg (ar).</p> <p>With regard to d.s., the permitted median and 80%-levels lie clearly in the range of mercury contamination of hazardous wastes (≥ 10 mg/kg d.s.), which are out of scope of SRF.</p> <p>The 50 %-rule for mercury is not sufficient.</p>	

1 **MB** = Member body (enter the ISO 3166 two-letter country code, e.g. FR for France; comments from the CMC editing unit are identified by \*\*\*)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

**NOTE** Columns 1, 2, 4, 5 are compulsory.