

By email

11<sup>th</sup> October 2019

Dear Members of Parliament,

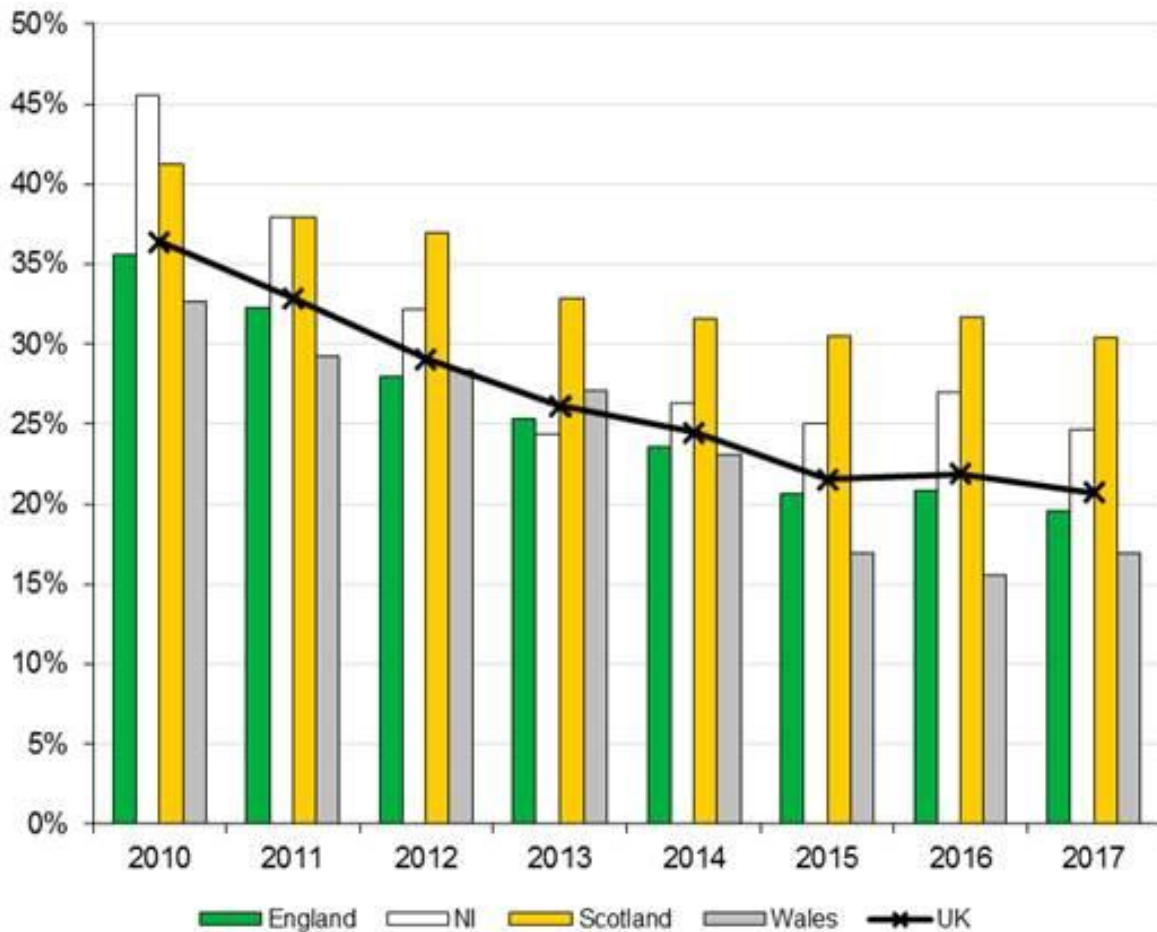
I write to you on behalf of the UK's RDF Industry Group. On September 27th the Secretary of State Mrs. Van Veldhoven responded to questions from Parliament on the proposed import tax. The answers are premised on a version of the United Kingdom's waste management situation that does not yet reflect reality. The RDF Industry Group would therefore like to inform Members of Parliament on the UK's current position and how the import tax would result in more landfill in the UK rather than more recycling.

Response given to question 2: It is stated that the UK has an active policy to promote recycling and divert waste from landfill. This is true and consists amongst other things, of a landfill tax that has grown from around GBP50 in 2012 to around GBP90 in 2019. This appears to make landfilling an unattractive alternative, according to the Dutch Ministry. However, the British Ministry, Defra, has published recycling and landfilling results from March 2019 which confirms that despite policies against landfill, significant tonnages are still landfilled in the UK.<sup>1</sup> Although 104 million tonnes of waste is being recycled, there are still 52 million tonnes of waste being landfilled annually, of which 7 million tonnes is biodegradable municipal waste. Waste exported from the UK is therefore being diverted from landfill – Dutch EfW operators are directly competing with UK landfill operators. If less waste is exported to the Netherlands it will not suddenly be recycled; it will 'return' to landfill. It is not simply a matter of gate fees or tax that drives waste from the residual waste stream into separate streams that can be recycled. Otherwise, the current 52 million and 7 million tonnes of waste landfilled in the UK would currently be recycled. More recycling and energy-from-waste capacity is being built in the UK, but this will not be sufficient to solve the problem for many years to come.. Please note the graph on development of landfilling of biodegradable municipal waste (as a percentage of 1995 baseline, UK and country split) from Defra:

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/784263/UK\\_Statistics\\_on\\_Waste\\_statistical\\_notice\\_March\\_2019\\_rev\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784263/UK_Statistics_on_Waste_statistical_notice_March_2019_rev_FINAL.pdf)



Source: Waste Data Interrogator, Defra Statistics

Our conclusion that significantly more landfilling will take place is supported by different governmental associations (which have all also sent in position papers to you for the roundtable session on the import tax):

- The Association of Directors of Environment, Economy, Planning & Transport (ADEPT) represents executive directors from the strategic tier of local government across England: "Any such move would immediately limit or preclude further export of material from our members. The UK lacks sufficient Energy from Waste (EfW) infrastructure to recover energy from all municipal waste generated meaning that in the short and medium term the default option would be landfill."
- The Local Authority Recycling Advisory Committee (LARAC) represents the local government recycling officers: "It is our anticipation that this tax measure will lead to more CO<sub>2</sub> emissions in

Europe, through increased landfilling of waste in the UK, instead of the targeted reduction.”

- The National Association of Waste Disposal Officers (NAWDO) represents local authorities with statutory responsibility for waste treatment and disposal: “The short to medium term option, after the import tax is introduced, would be to landfill this residual waste again at greater environmental cost”.

Response to question 3: The Ministry confirms that landfilling of waste results in more CO<sub>2</sub>e emissions than processing this waste in an energy-from-waste facility. Where the assumption of the Ministry goes wrong is to assume that no additional landfill will take place. The Ministry wrongly assumes that the import tax would lead to more recycling in the United Kingdom, and not to more landfill. In fact, this measure would likely result in *less* recycling: Currently residual waste goes through an RDF production plant to make a 'refuse derived fuel' (RDF) for Dutch waste-to-energy plants. In the RDF production plant valuable materials such as metals are taken out, and the material is pressed into bales and wrapped for transport. If the RDF export into the Netherlands is no longer economically viable due to the import tax, the waste will go straight to the landfill site without this pre-treatment/recycling step. So actually, less recycling and more landfill will take place, with a significant increase in CO<sub>2</sub>e emissions.

Response to question 4: The Ministry has made an estimation that 0.2 million tonnes of CO<sub>2</sub>e will be saved from the import tax. The RDF Industry Group established that in 2018 the import of waste from the Republic of Ireland and United Kingdom into the Netherlands resulted in a CO<sub>2</sub>e saving of 370,000 tonnes. This calculation was made by the environmental consulting firm Eunomia, an international firm that also advises UK government and the European Commission. The RDF Industry Group questions the Ministry's estimation and would very much like to review the CO<sub>2</sub>e estimation from the Ministry, but has unfortunately so far not seen any publication of the Ministry's calculations.

The RDF Industry Group has taken an evidence-based approach to conclude that the import tax will lead to more CO<sub>2</sub>e emissions, more landfill and less recycling, which conclusion is supported by different governmental associations. The RDF Industry Group therefore proposes in the strongest possible terms that the import tax not be implemented, but instead to consult the waste management industry to propose alternative ways to achieve the desired CO<sub>2</sub>e reductions.

Yours sincerely,

Robert Corijn  
Chair, RDF Industry Group