

25 September 2019

Dear Mr Israel

**The Netherlands Proposed Waste Import Tax.**

LARAC is writing to you in relation to the recent proposals to implement a new tax at very short notice on United Kingdom (UK) imported waste sent for energy recovery in The Netherlands. We are concerned to learn of tax proposals by the Dutch government the implications it could have on local authorities and waste management in general in the UK. 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 proposal will directly lead to higher waste costs for local authorities who are having to manage years of funding reductions and are already having to cut services. An increase in waste management costs could well mean more cuts in other services.

There remains an under-capacity to treat residual waste in the UK and the current routes to facilities in the Netherlands provide a valuable solution to this issue. If an import tax is introduced then the short to medium term option would be to landfill this residual waste, incurring a greater environmental cost than the current route. Landfilling this waste in the UK will generate greenhouse gas emissions 25 times more potent than CO<sub>2</sub>, endangering climate change commitments and targets, which are the exact concerns the Dutch Urgenda court case, the motivator for this tax proposal, is looking to address.

The Dutch tax proposal is merely on energy recovery plant input which does nothing at all to address the origin and cause of waste; product manufacturers and consumer behaviour. We feel that The Netherlands' current EFW tax approach already has not had the desired effect in reducing total waste volumes and moving more waste towards recycling.

Several of our members have made long term investment in waste export infrastructure which, if the import tax is introduced, this could become obsolete or unaffordable after 1st January 2020. This would put at risk the employment derived from operating this infrastructure. The proposal will directly lead to higher waste costs for local authorities at a time when austerity remains a key issue for local authorities. If the Dutch government is still intent on implementing this tax and progresses with the proposal, we would ask for a transition period during which investment in sufficient alternative recycling and treatment capacity can be developed in the UK to treat this waste.

The proposal is for this tax to be implemented within just 6 months from 1<sup>st</sup> January 2020 which leaves virtually no environmentally sustainable alternatives. Due to waste export to The Netherlands becoming financially unattractive, it is more than likely there could be delays to waste handling and transportation causing back-ups in the collection system through to disposal routes.

LARAC remains committed to working with all our stakeholders around fundamentally important issues such as resources and waste management. UK local authorities and LARAC members would appreciate continued cooperation between European countries to use each other's recycling, waste and EFW infrastructure to jointly achieve Circular Economy and Climate goals. We look forward to our concerns being considered at the Dutch House of Representatives hearing on 1<sup>st</sup> October 2019.

Regards



Lee Marshall  
CEO