

RREUSE Response to Public Consultation on EU Certification for Waste Treatment Facilities

Introduction

The lack of control and transparency concerning the end destination of waste shipped within and outside of the OECD has resulted in a large number of illegal exports of waste¹. Moreover, this waste can end up in countries which may not have the appropriate capacity to treat the materials or simply are unable to do so if the waste is mixed and contaminated with non-recyclables². This is a definite cause for concern and regulatory actions are needed. RREUSE, however, has doubts that EU certification of non-OECD treatment centres would be an effective path to tackle the issue at this moment in time.

EU certification scheme for waste treatment facilities – solution to illegal exports?

The Waste Shipment Regulation (WSR) is an important tool which has been put in place to combat the issue of illegal waste shipments and RREUSE welcomes the current proposed changes which pose stricter requirements for exports and more concrete guidance on inspections for Member States. However, due to lack of implementation the WSR has not achieved the needed effect with restricted personnel capacity and resources of border control authorities being obstacles to enforcement.

This raises the question whether a new regulation requesting certification and requiring increased time and monetary resources in order to apply appropriate checks by control authorities will be of added value considering the current situation. It may be more appropriate to increase enforcement of existing legislative tools rather than to impose additional administrative burden on resource constrained authorities.

In addition it is difficult to envisage a certification scheme to be met by countries outside of the OECD territory when there are no similar schemes implemented within them. It would therefore be appropriate to firstly come to a consensus on measures within the EU and OECD before imposing demands on non-OECD countries.

Finally it should be in the interest of regulation to support a diversity of actors in the waste supply chain and to ensure that the operation of smaller entities is not jeopardized to privilege large players. Hence care should be taken to not overregulate in such a way that it has a negative impact on the business landscape of waste trade and treatment.

¹ IMPEL's detailed report from the joint inspections (2011): IMPEL-TFS-EA-II-Project-_Final-report-adopted is available on: http://impel.eu/wpcontent/uploads/2012/01/IMPEL-TFS-EA-II-Project-_Final-report-adopted-v1-4.pdf.

² Waste exports: a good practice guide for local authorities (2011) by European Pathway to Zero Waste. Environment Agency. Available on: http://cdn.environment-agency.gov.uk/167_12_dea8e5.pdf

Further possible solution approaches

As a first and very important step in order to combat illegal waste shipments RREUSE sees the necessity of **improving the implementation of the Waste Shipment Regulation** by optimizing border inspections through increased resources.

Furthermore RREUSE believes that setting **mandatory separate collection** of waste and requirements in **product design to ensure full reusability and recyclability** would be of added value to waste treatment quality world-wide. This would ensure the removal of contaminants and increase the quality of the exported material and therefore would reduce the risk of sub-standard treatment and improve the quality of recycle outputs.

Additionally fostering the **capacity building** of non-OECD countries to improve their own waste treatment capacity is a very important approach to further address this issue, e.g. by supporting an improved exchange of knowledge and transfer of technology between countries within and outside EU territory.

Lastly, even though RREUSE does not believe that a mandatory certification scheme would be the right choice to address the current situation, the option of a **voluntary approach** could be examined as it may potentially help increase transparency and also make it easier to identify responsible business partners for those companies who feel ready to do so.

References

1. IMPEL's detailed report from the joint inspections (2011): IMPEL-TFS-EA-II-Project-_Final-report-adopted is available on: http://impel.eu/wpcontent/uploads/2012/01/IMPEL-TFS-EA-II-Project-_Final-report-adopted-v1-4.pdf.
2. Waste exports: a good practice guide for local authorities (2011) by European Pathway to Zero Waste. Environment Agency. Available on: http://cdn.environment-agency.gov.uk/167_12_dea8e5.pdf

Who we are:

The Reuse and Recycling EU Social Enterprises network (RREUSE) is a European umbrella organisation for national and regional networks of social enterprises with re-use, repair and recycling activities. Approximately 42,000 Full Time Equivalent (FTE) employees and over 200,000 volunteers and trainees work throughout our 24 member organisations across 14 EU Member States. Although structures and national contexts are diverse, RREUSE members share common elements such as the protection of the environment, the fight against poverty and, especially, the progress of disadvantaged people back into the labour market. RREUSE's main goal is to put sustainable development into practice by encouraging job creation and social inclusion in the field of waste prevention and sustainable waste management activities

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