



Association of Directors of
Environment, Economy, Planning & Transport

Position Paper regarding the proposed taxation of imported Refuse Derived Fuel (RDF)

To: The Netherlands Parliament Commissie Infrastructuur en Waterstaat.

The Association of Directors of Environment, Economy, Planning & Transport (ADEPT) www.adeptnet.org.uk represents executive directors from the strategic tier of local government across England. Members represent county, unitary and metropolitan borough councils. ADEPT's members are responsible for delivering "place based" public services related to the physical environment and the economy, but which have a significant impact on all aspects of the country's wellbeing. ADEPT represents members' interests by

- proactively engaging UK Government on emerging policy & issues
- promoting initiatives aimed at influencing Government policy
- the development of best practice, and
- responding to European and UK Government initiatives and consultations.

Councils represented by ADEPT members are also Waste Disposal Authorities, many of whom export RDF to The Netherlands and elsewhere.

ADEPT has since the proposal first came to our attention in July been extremely concerned about proposals from the Netherlands Government to impose a tax on the import of RDF into the Netherlands. Our concern is for the following reasons:

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 cost differential of UK Landfill would be substantial at time when we are subject to austerity measures and trying to invest in improved UK infrastructure. With decreasing landfill capacity in the UK, the additional demand could lead to movement of (untreated) waste greater distances and potentially delays to disposal.

Above all this move would, if introduced hurriedly, be counterproductive environmentally and economically – it would increase total greenhouse gas emissions. Landfill of any organic fraction is significantly more polluting than EfW.

If import of UK RDF was rapidly reduced there would be little or no tax revenue generated and The Netherlands would need to replace the fuel lost with another source. This could have more significant environmental and financial consequences, particularly as we understand biomass as a source of fuel is subsidised.

We also understand that any increase in available EFW capacity as a result of losing imported material from the system would potentially make The Netherlands' own recycling efforts and

industry less economical. This could impact on achievement of the revised recycling targets for 2025 arising from the revision of the Waste Framework Directive.

We would respectfully call for Members of Parliament to consider the overall impact of this proposal from a transboundary and global perspective and, at the very least, pause the process for a full Environmental and Financial Impact Assessments to be made. If the changes are to go forwards we would urge that longer notice is given so that alternative arrangements can be made which can mitigate these very real impacts.

We, along with other professional colleagues representing UK Waste Disposal Municipalities, would be very happy to discuss these implications in more detail if it would be helpful in building a full picture of the implications of this measure.

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