



NATIONAL ASSOCIATION OF WASTE DISPOSAL OFFICERS

NAWDO position statement for The Netherlands Parliament Commissie Infrastructuur en Waterstaat on the proposed The Netherlands waste import tax.

London, 24th September 2019

To whom it may concern

NAWDO supports the reduction of greenhouse gas emissions, the circular economy and moving towards a more resource efficient society. We are concerned to learn of the new waste import tax proposals by the Dutch government and to implement this tax at very short notice on United Kingdom (UK) imported waste sent for energy recovery in The Netherlands. It is our anticipation that this tax measure will lead to more CO₂-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 at a time when austerity and funding for British local authorities remains a key issue.

- **Assumptions on greenhouse gas emission savings**

There remains an under-capacity to treat residual waste in the UK. The short to medium term option, after the import tax is introduced, would be to landfill this residual waste again at greater environmental cost. Landfilling this waste in the UK will generate greenhouse gas emissions 25 times more potent than CO₂, 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.

- **Assumptions on increased waste recycling**

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 consumption behaviour. We note that The Netherlands' current EFW tax approach already is not very effective in reducing total waste volumes and moving more waste towards recycling.

- **NAWDO's concern on increased costs**

Several of our members have made long term investment in waste export infrastructure which is now threatened to become obsolete or unaffordable after 1st January 2020 which could also see an end to 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 intent on implementing this tax regardless, 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.

- **NAWDO's concern around the proposal endangering public hygiene**

The proposal is for this tax to be implemented within just 6 months from 1st 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.

NAWDO remains committed to working with all our stakeholders around fundamentally important issues such as resources and waste management. NAWDO's 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



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look forward to our concerns being considered at the Dutch House of Representatives hearing on 1st October 2019.

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Notes to the Committee

About us:

NAWDO, the National Association of Waste Disposal Officers, is the primary network and voice for local authorities with statutory responsibility for waste treatment and disposal. NAWDO was formed in 1992 and its members include London Boroughs, Metropolitan, Unitary, Joint Waste Disposal Authorities, Waste Partnerships and County Councils from all UK regions (except Scotland) to keep up to date with the fast changing waste and resources industry. Through NAWDO local authorities are provided with presentation on regional, national, international and strategic forums and groups to inform, influence and collaborate with key stakeholders and policy makers. NAWDO is entirely run by volunteers and through its Policy and Advisory (P&A) Committee it sets the direction of the organisation with member engagement. With over 80 members NAWDO represents around 80% of all local authorities with waste disposal duties in the UK. NAWDO holds quarterly meetings where its members, central government, regulators, waste industry and other affiliated groups discuss and debate challenges and current developments in the waste and resources industry, helping shape and influence (future) decisions and policy. It also provides an online forum where members can openly discuss and debate current and relevant issues facing senior officers with waste treatment and disposal portfolios.

Contacts:

Gurbaksh Badhan, Chair – gbadhan@buckscc.gov.uk

Emma Beal, Vice Chair – emmabeal@westlondonwaste.gov.uk

Jarno Stet, Secretary – jstet@westminster.gov.uk

Tony Norris, Treasurer – NAWDO.treasurer@outlook.com

Website – nawdo.org.uk