

# RDF Export and the Implications of a No-Deal Brexit

*RWM*

*September 2018*

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Secretariat*



# RDF Industry Group

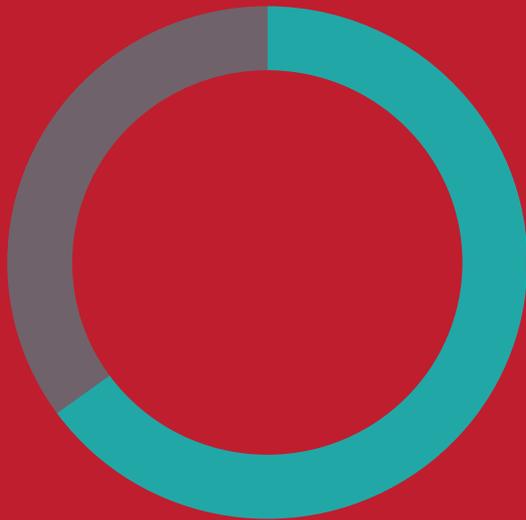


**3.7**

**million tonnes**

**32**

**members**



**>67%**

**of RDF exported  
from UK**

**ABP** | ASSOCIATED  
BRITISH PORTS

**aeb**  
amsterdam

**attero**  
waste not think

**BRIYANIAGREST**  
RECYCLING

**Cawleys**  
waste management solutions

**Combienergy**  
- developing alternative resources

**COUNTRYstyle**  
RECYCLING

**GWM**  
Environmental

**DFDS**

**EFO**  
RELOCATING ENERGY™

**FCC**  
Environment

**G**  
GEMINOR

**GMVA**

**GP SHIPPING**  
LIMITED

**INDAVER**

**MCGRATH**

**NLP**  
Alternative Fuels

**Panda**

**POWERDAY**  
Innovative · Recycling · Solutions

**Re-Gen**  
Recycling & Energy Solutions

**REKOM**

**REMONDIS®**  
IM AUFTRAG DER ZUKUNFT

**renewi**  
waste no more

**R** River  
Ridge  
Recycling

**SCA**

**SENECA**  
Resource Recovery  
Solutions

**S**  
SOCOTEC

**suez**

**swb**

**Twence®**

**TOTUS®**  
Environmental

**VEOLIA**

# Code of Practice

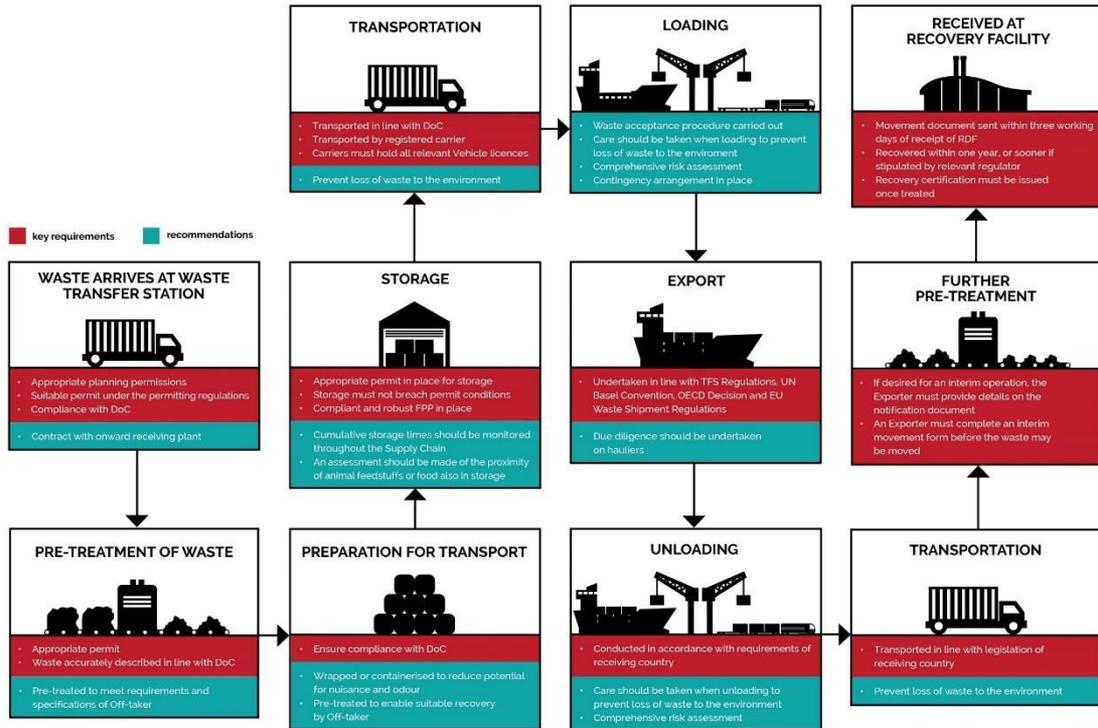


## REFUSE DERIVED FUEL CODE OF PRACTICE FOR THE UK

VERSION 1

OCTOBER 2017

Image courtesy of Ashens



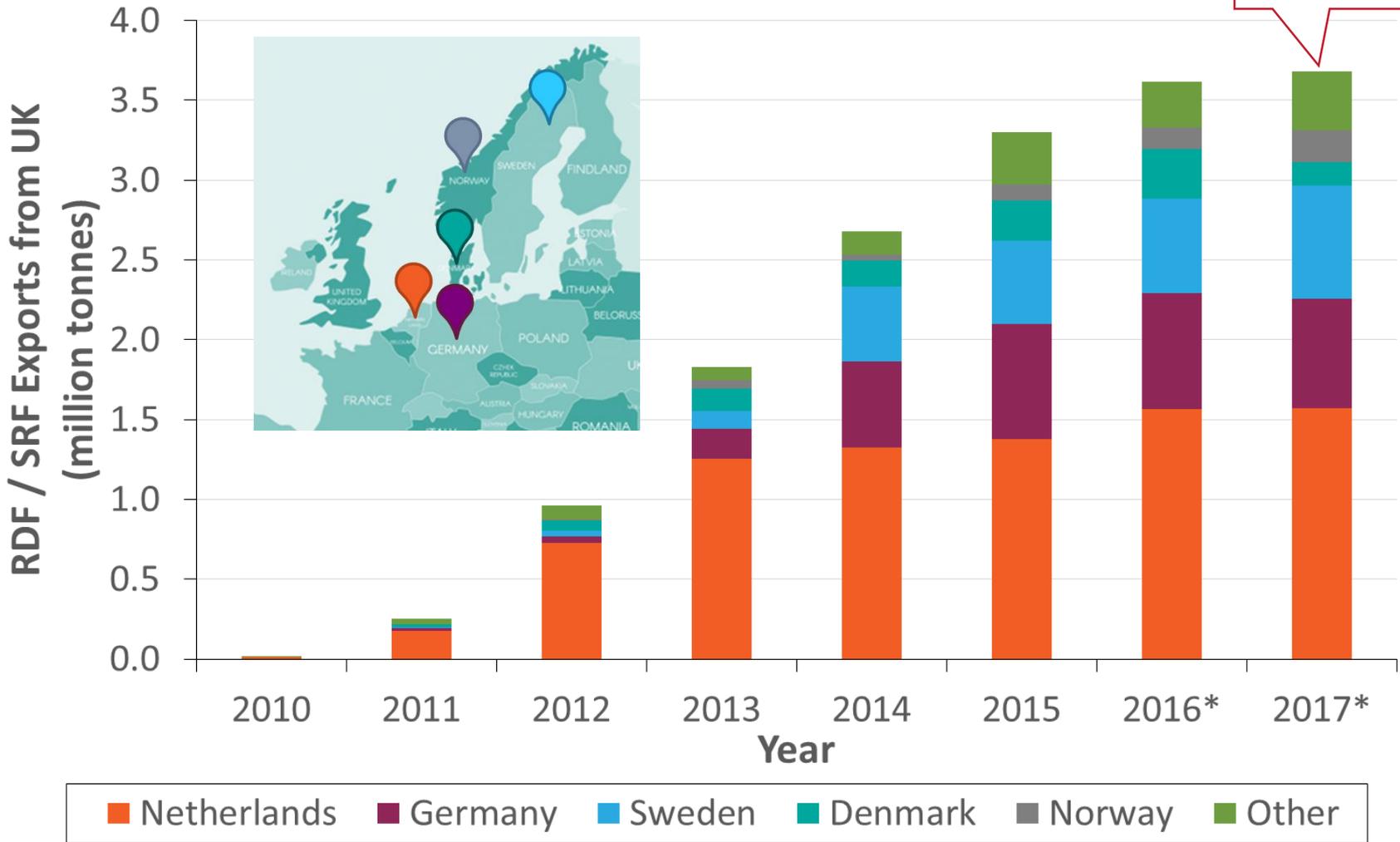
# RDF Market to Date



# Key Off-takers 2010-2017

UK RDF exports by destination country (mt)

2017 shows  
plateauing  
tonnage

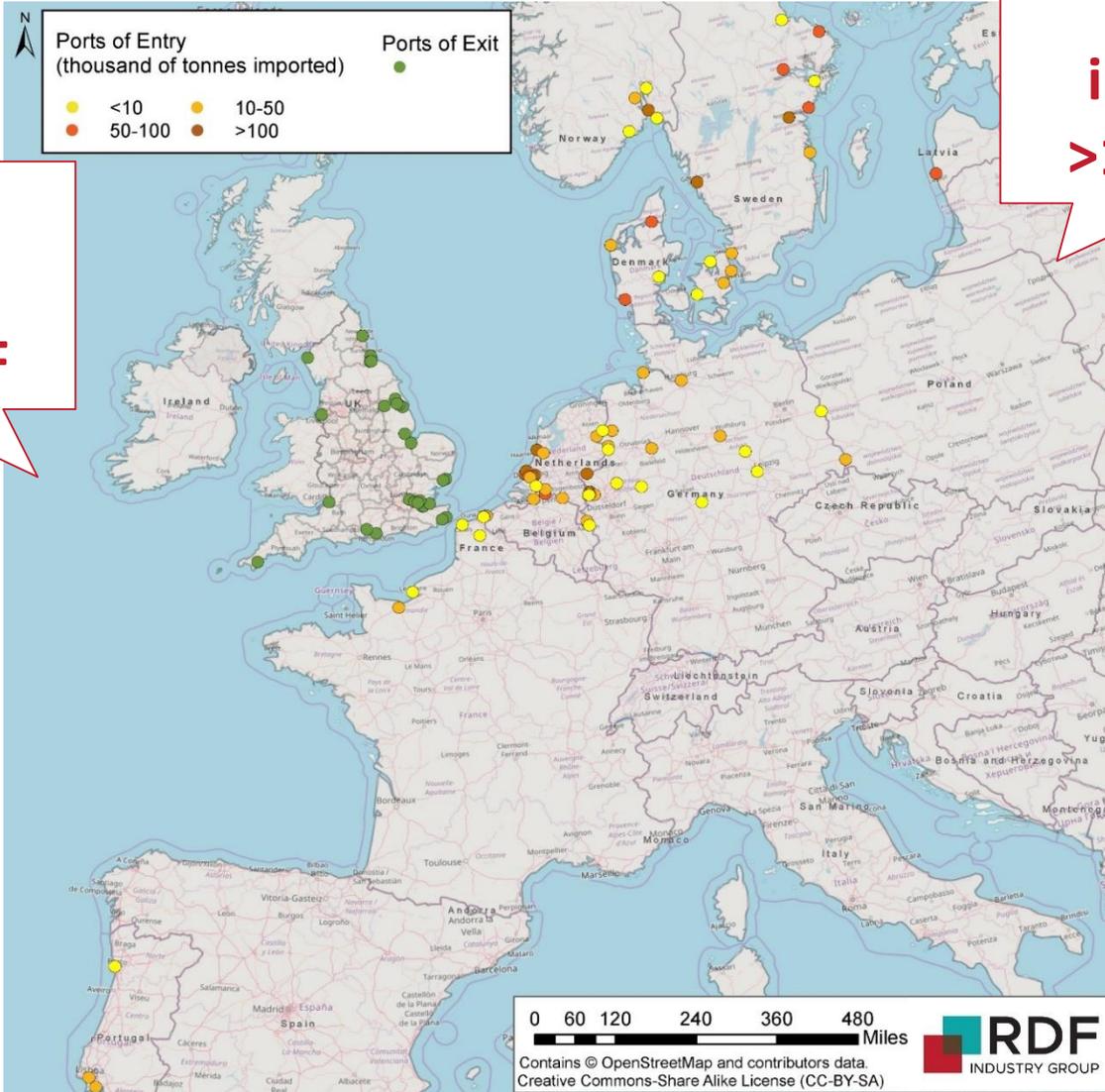


\*Data is provisional.

# Ports of Exit and Entry

Ports of Entry, RDF imported from England, 2016

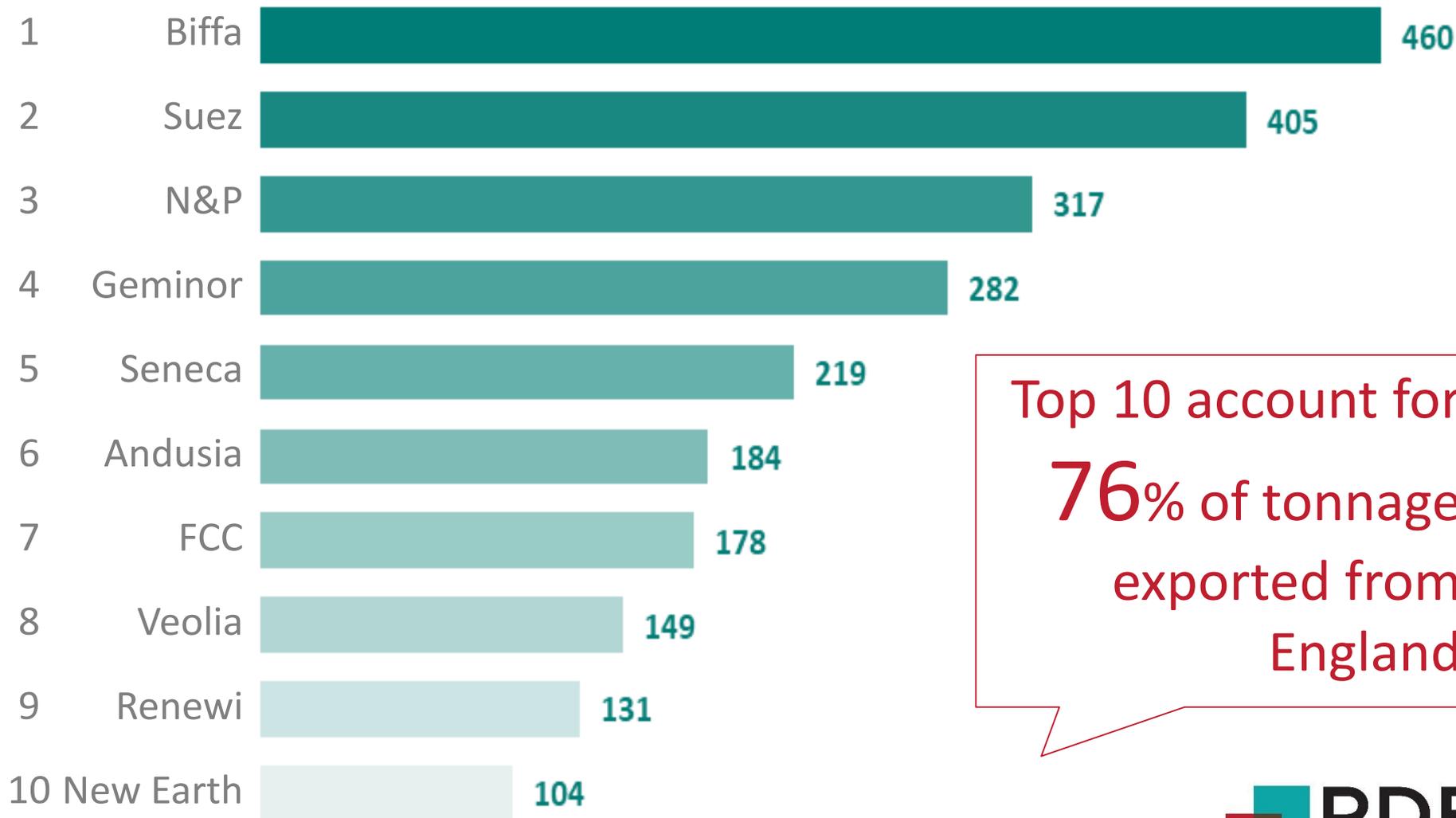
6 ports  
exporting  
>100kt RDF



10 ports  
importing  
>100kt RDF

# Key RDF Exporters in 2017

Top 10 exporters from England (kt)

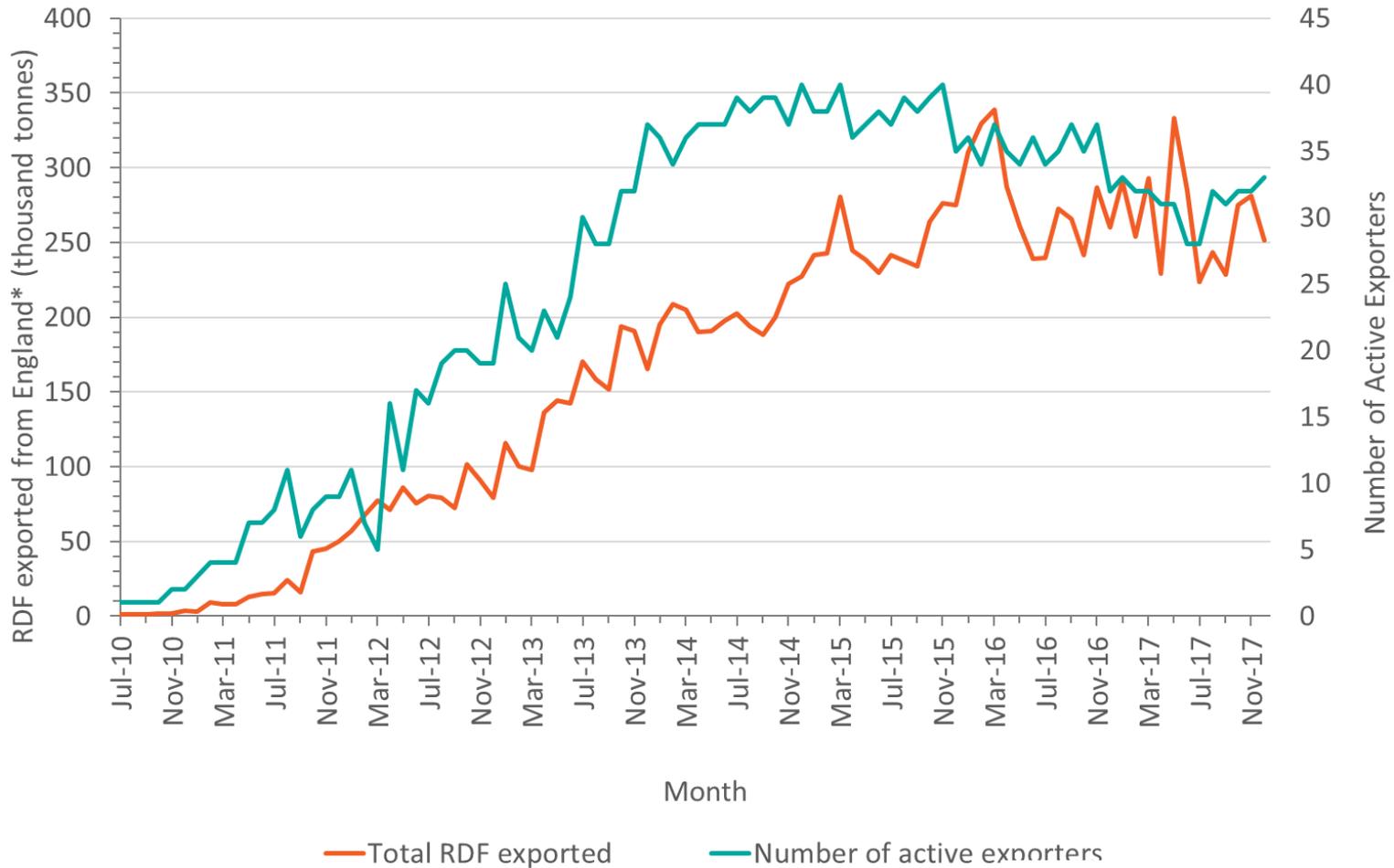


Top 10 account for  
**76%** of tonnage  
exported from  
England

Source: Environment Agency, 2017 provisional figures

# Market Consolidation 2010-2017

RDF Exported from England (kt) vs. Number of Notifiers



\*2010-2014 includes exports from Wales

# Brexit – No Deal Implications



# Exchange Rate

- £ weakened by ~20% against €
- Cost increases at least £5 per tonne
  - Contracts with gate fees in € hit hardest
- Potential for further fluctuations
- May be some flexibility in gate fees to remain competitive & absorb currency changes



# Legislation

- Waste shipments is an international regime – Basel/OECD
- EU (Withdrawal) Act – bringing EU waste shipments law into UK law
- **No** significant changes in the way shipments will be controlled
- ‘Fixing’ legislation will be laid in October/November



# TFS Consents

- Existing approved shipments **may** be subject to a re-consenting process
  - Defra in discussion with the European regulators
- Concerns around:
  - Disruption to shipments on day 1
  - Implications for permitted sites
    - Storage capacity
    - Storage time
  - Increased workload for UK regulators/notifiers



# Tariffs

- Is RDF a good or a service?
- UK position is that recovery of RDF is a service
- RDF therefore should not be subject to goods tariffs
  - Otherwise municipal waste attracts a 6.5% tariff
  - But still need EU agreement on this



# Customs

- Customs notifications – unclear how this will work
- Customs checks - anticipated for 5% of movements
- Delays at the ports could cause problems

# To Summarise...

- 3 main concerns for a no-deal Brexit are:
  1. TFS notifications no longer valid
  2. Lack of clarity on goods vs services
  3. Serious delays and backlogs at the border



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