

RDF Export and the Implications of a No-Deal Brexit

RWM

September 2018

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RDF Industry Group



3.7

million tonnes

32

members



>67%

**of RDF exported
from UK**

ABP | ASSOCIATED
BRITISH PORTS

aeb
amsterdam

attero
energy and water

BRITANIAGREYST
RECYCLING

Cawleys
lead security & safety specialists

Combineering
- developing alternative resources

COUNTRYstyle
RECYCLING

GWM
Amplified
Environmental

DFDS

EFO
RELOCATING ENERGY™

FCC
Environment

GEMINOR

GMVA

GP SHIPPING
LIMITED

INDAVER

MCGRATH

NLP
Alternative Fuels

Panda

POWERDAY
Innovative · Recycling · Solutions

Re-Gen
Generating a Greener Future

REKOM

REMONDIS®
IM AUFTRAG DER ZUKUNFT

renewi
waste no more

River Ridge Recycling

SCA

SENECA
Resource Recovery
Industrial Systems

SOCOTEC

suez

swb

Twence®

TOTUS®
Environmental

VEOLIA

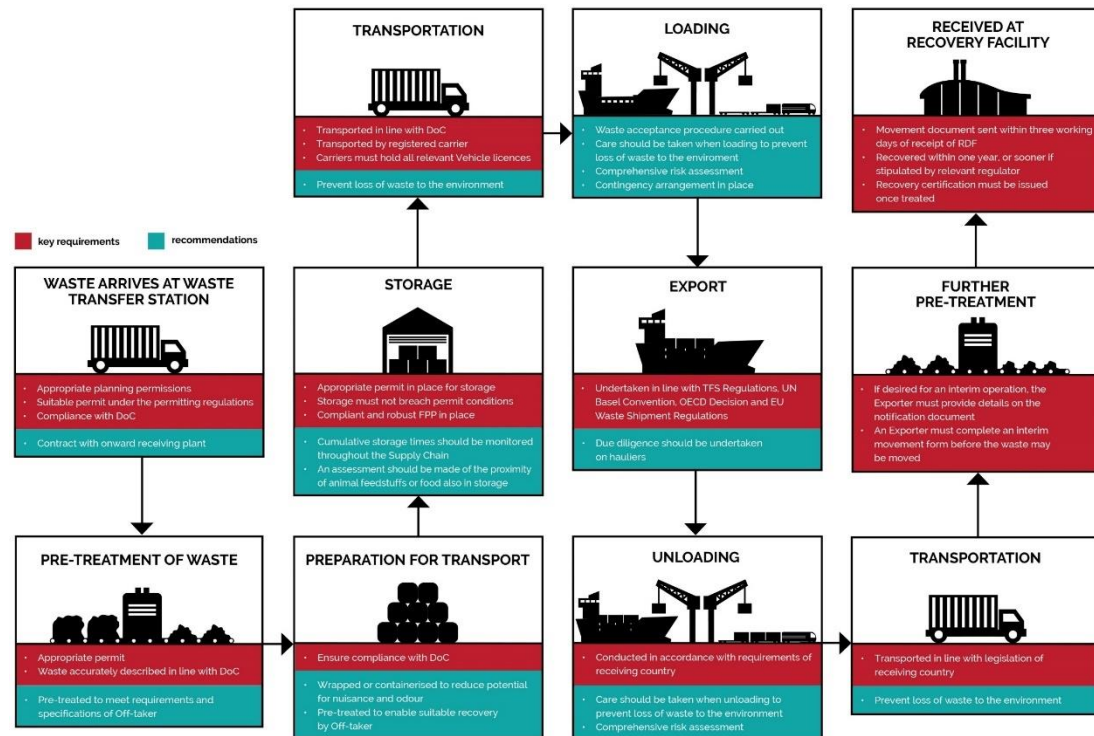
Code of Practice

REFUSE DERIVED FUEL CODE OF PRACTICE FOR THE UK

VERSION 1

OCTOBER 2017

Image courtesy of Ashens

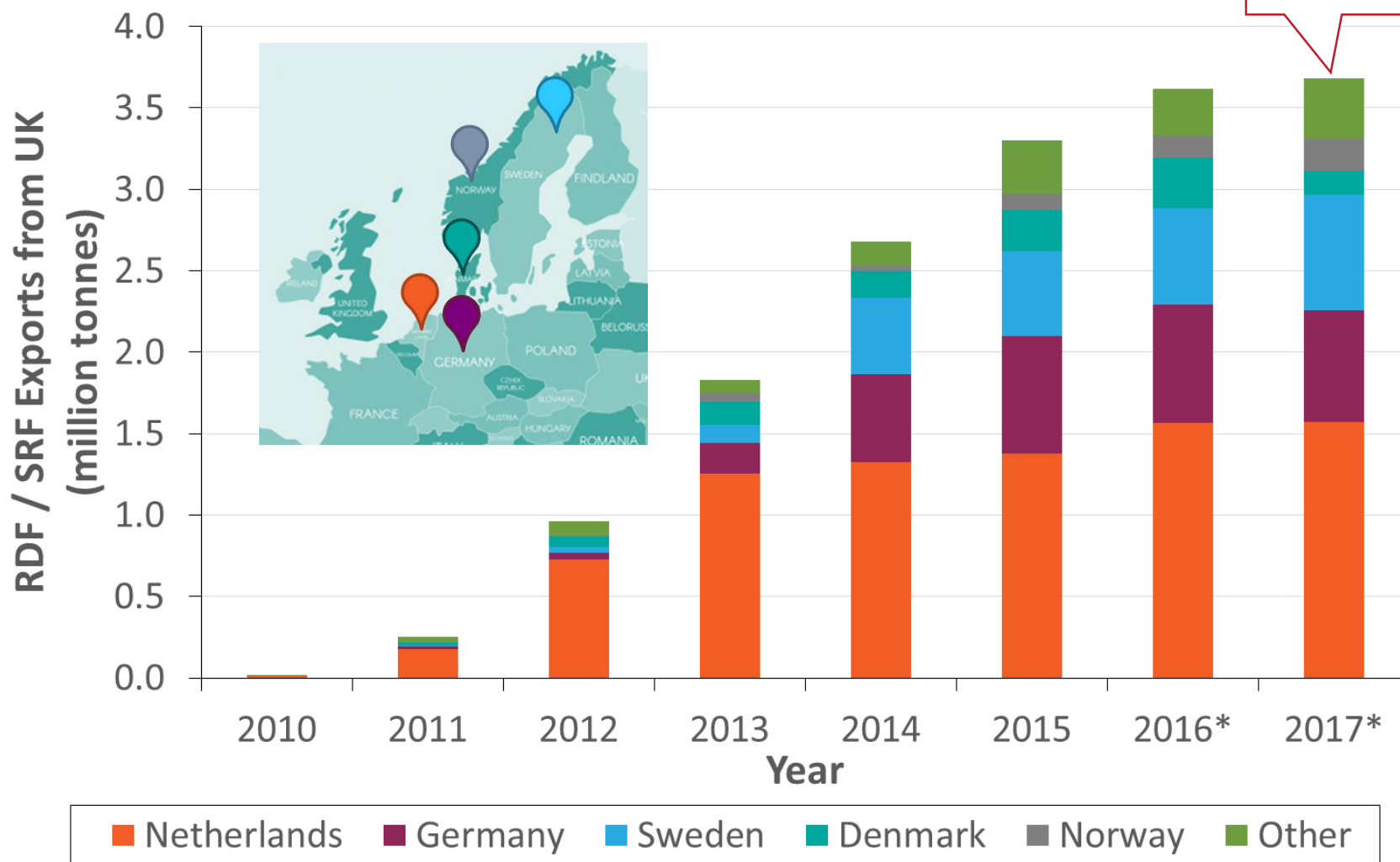


RDF Market to Date



Key Off-takers 2010-2017

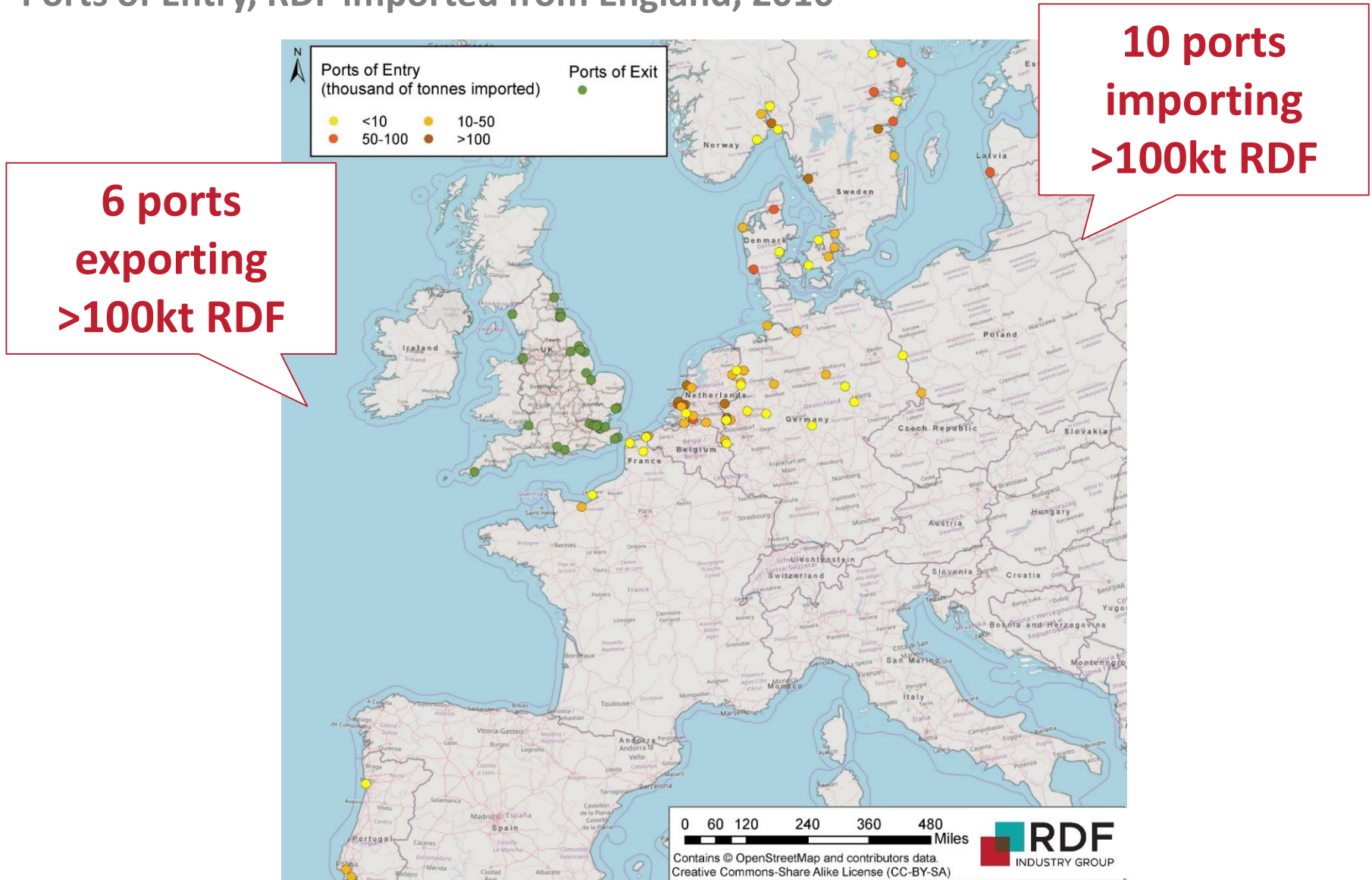
UK RDF exports by destination country (mt)



*Data is provisional.

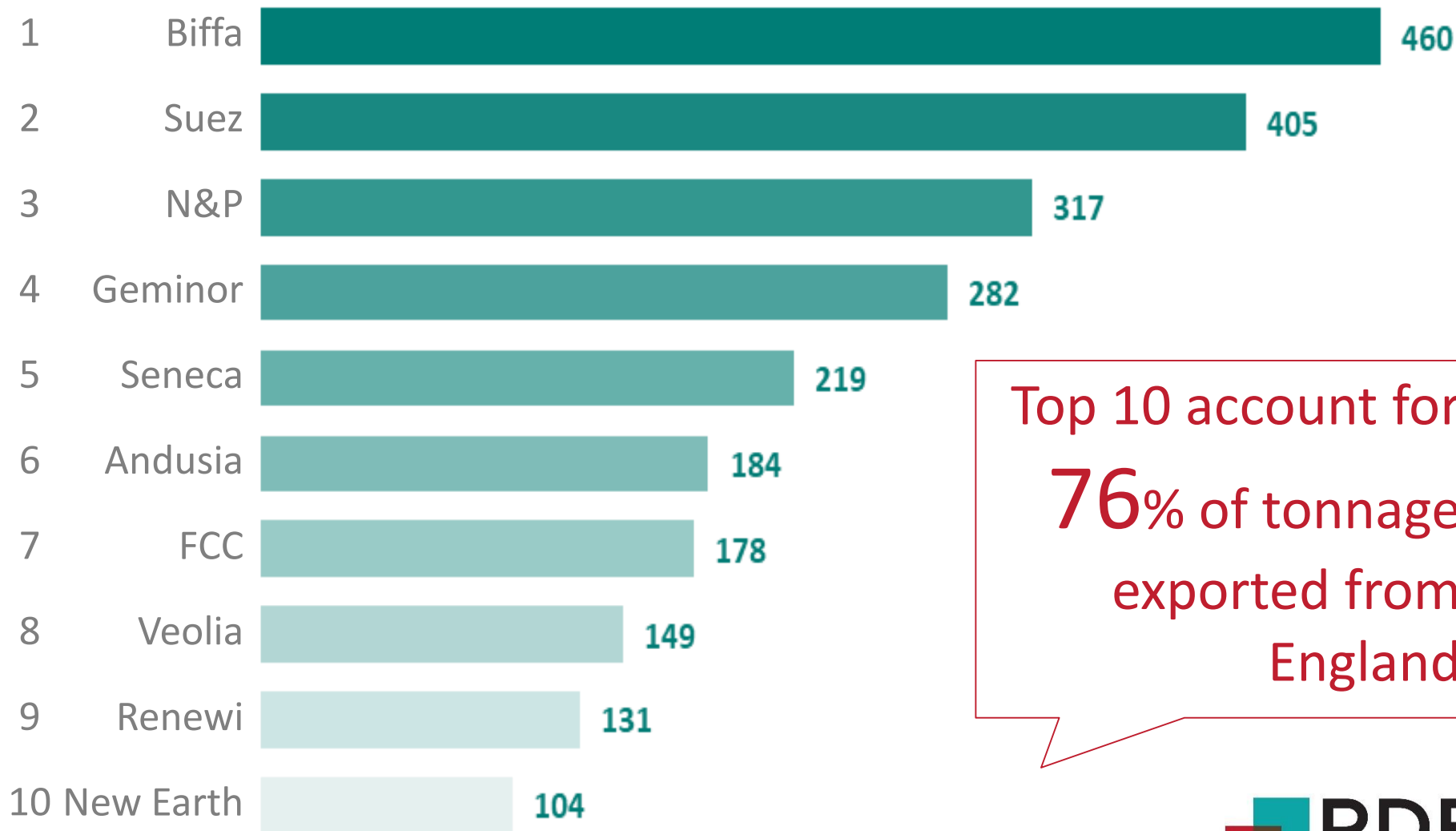
Ports of Exit and Entry

Ports of Entry, RDF imported from England, 2016



Key RDF Exporters in 2017

Top 10 exporters from England (kt)

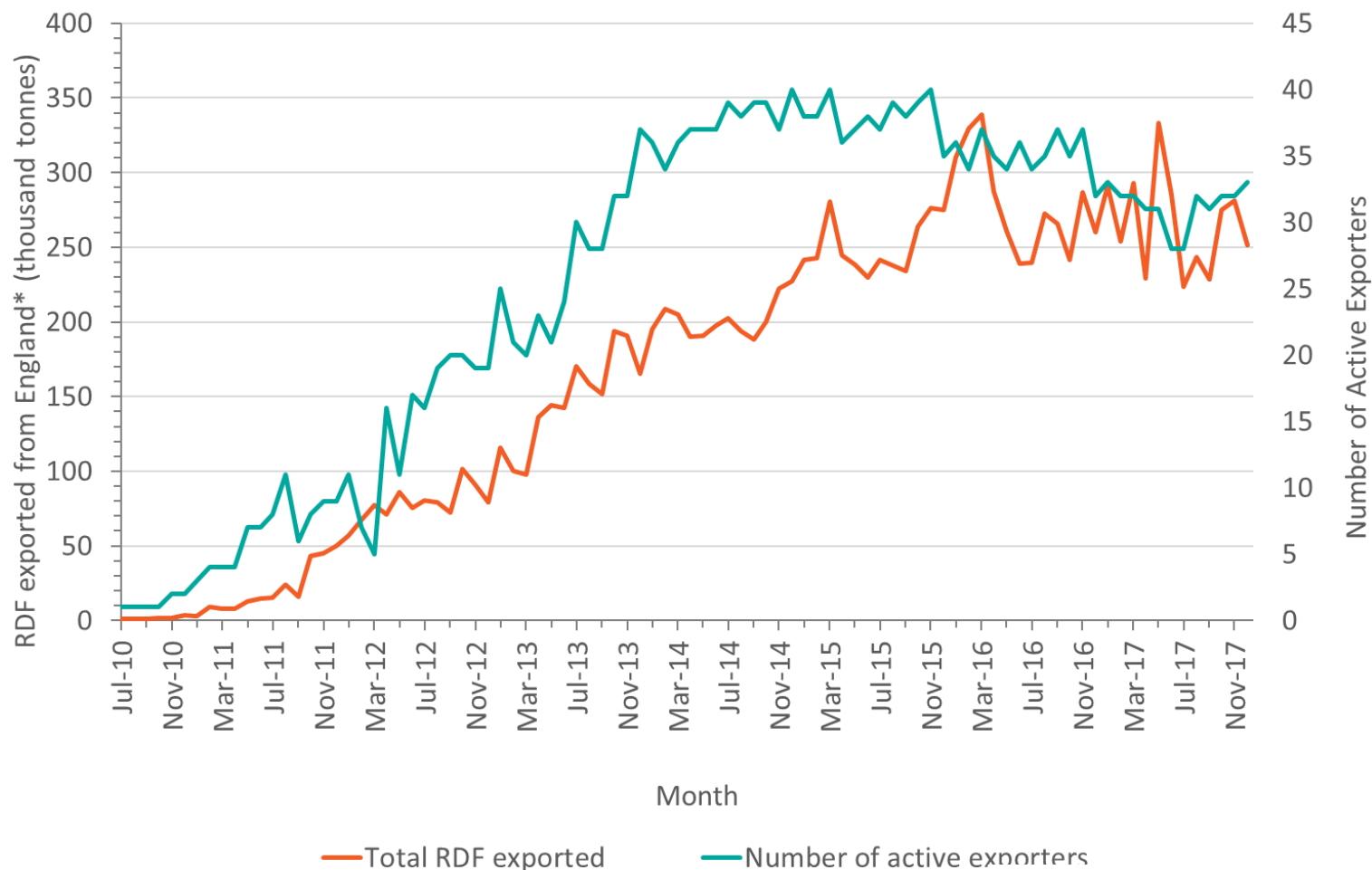


Top 10 account for
76% of tonnage
exported from
England

Source: Environment Agency, 2017 provisional figures

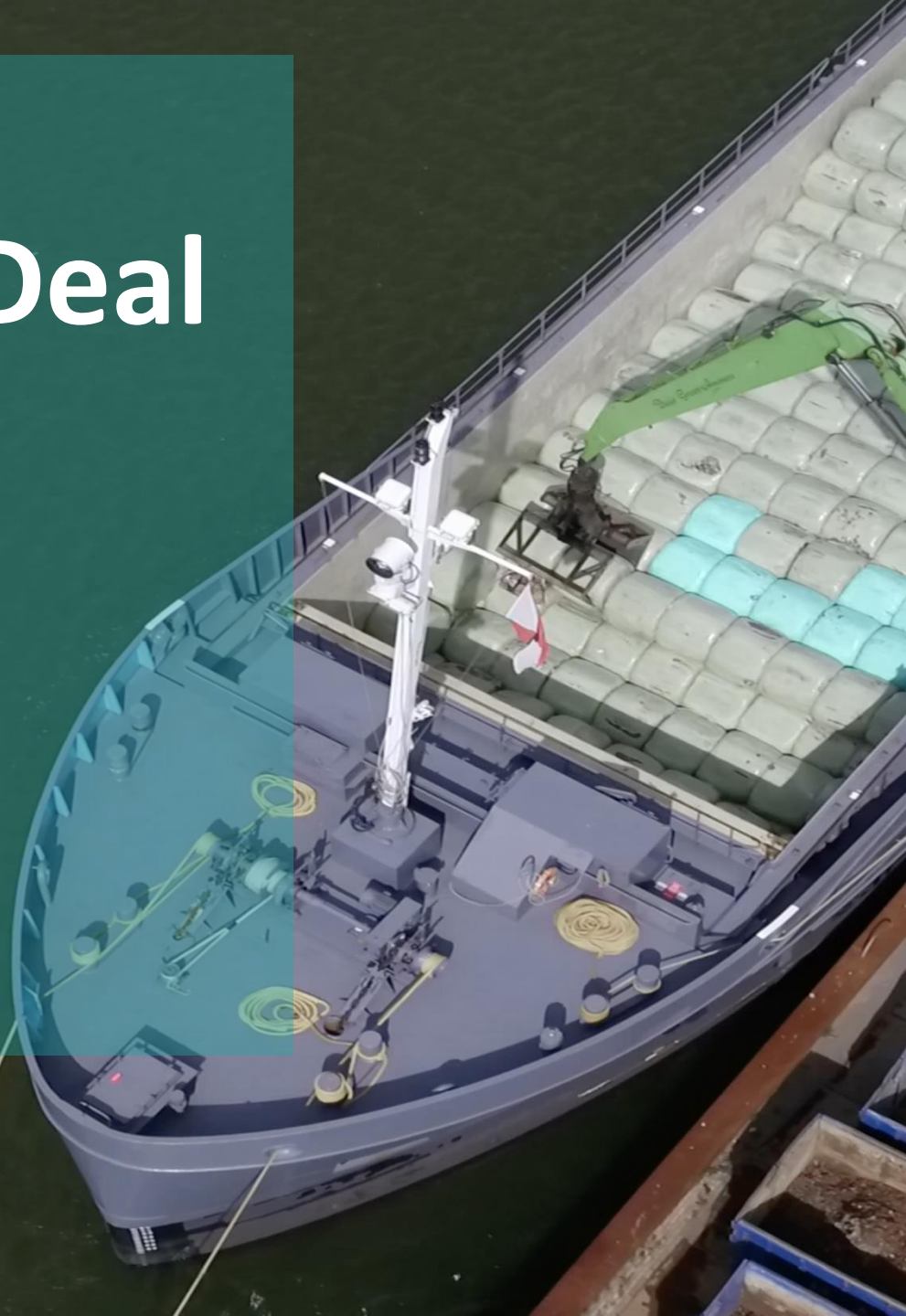
Market Consolidation 2010-2017

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 mains 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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