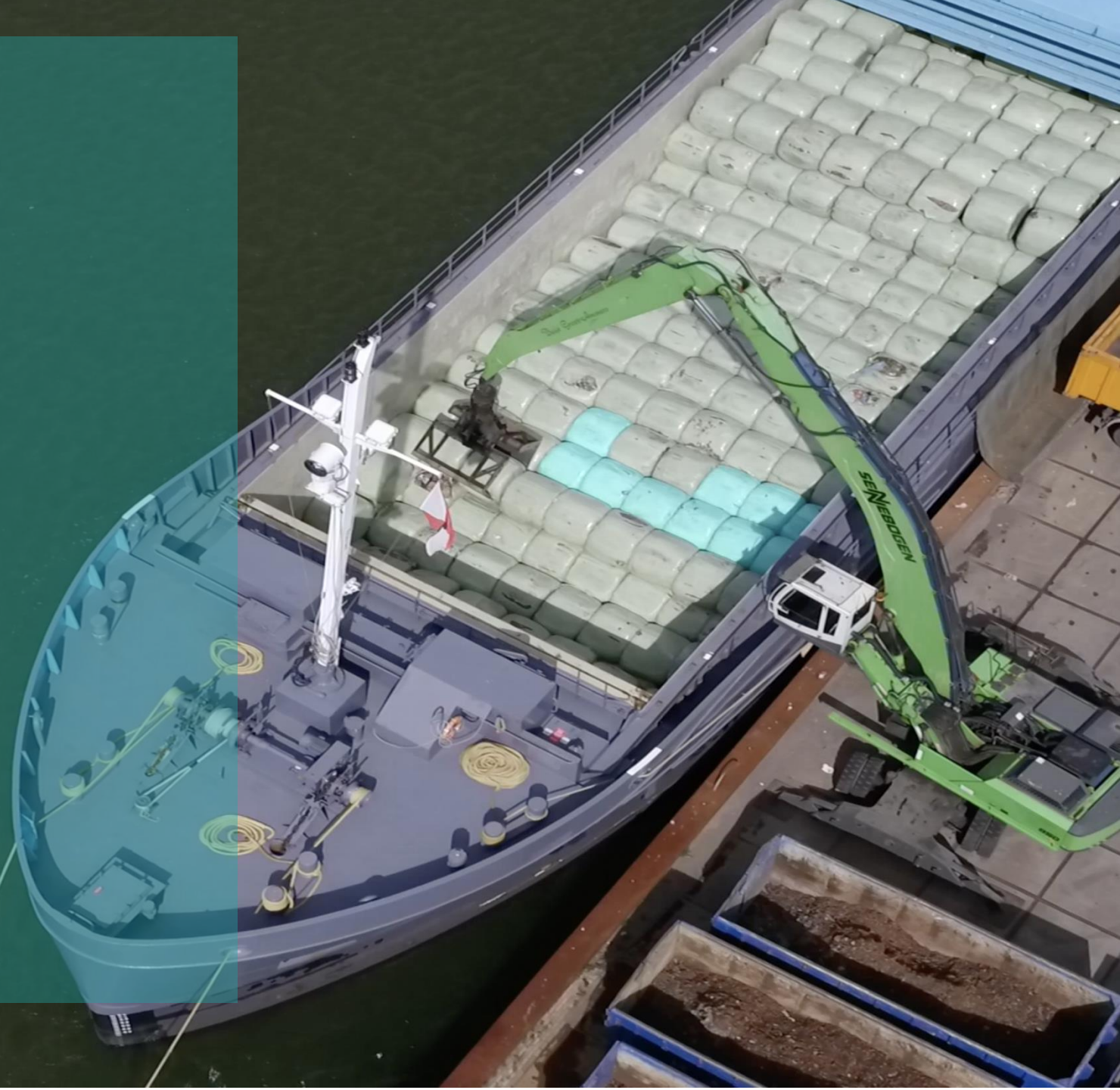


RDF Export: No Deal Preparations

*Defra Stakeholder
Event
January 2019*

*Bethany Ledingham,
RDF Industry Group
Secretariat*

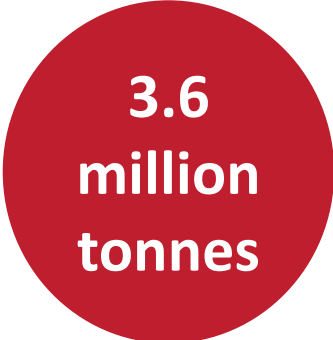


Agenda

- RDF Industry Group
- Impact on RDF supply chain
- Issues and actions
 - Notifications
 - Customs
 - Ports
 - Contingency/Storage
 - Tariffs

RDF Industry Group





3.6
million
tonnes

Of RDF exported



14%

Of UK residual waste is
exported



>67%

Of RDF exported by
Group members

Impact on Supply Chain

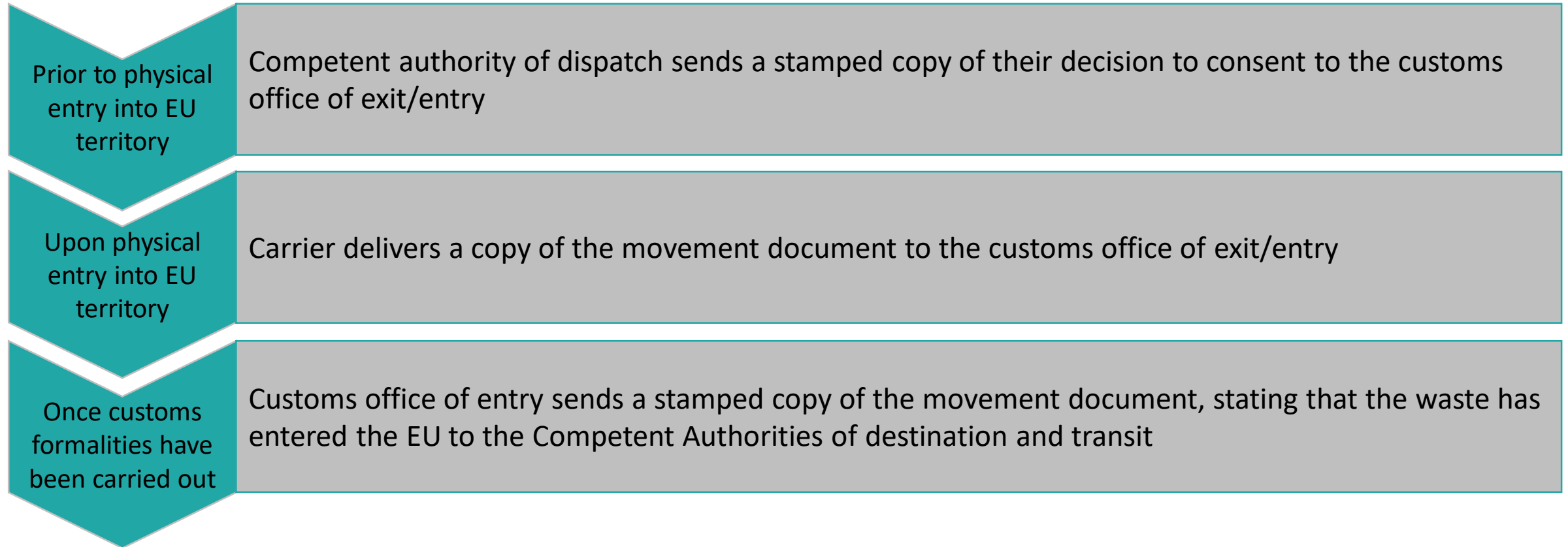
- 6 months' disruption -1.8 million tonnes
- Supply chain disruption, RDF stuck at:
 - Exit ports - without a legal mechanism to leave
 - Transfer stations
 - Operators unable to send RDF to ports – no more storage capacity
 - In transit - waste that cannot be accepted at a transfer site
 - Potential impact on waste collections?



Notification Process

- TFS consents not valid under no-deal scenario
- UK has asked European CAs to agree mass amendment of TFS' under Article 17
- Where agreed, TFS notifications will 'roll over' past end of March
 - No action needed from notifiers
- Identify CAs left to agree

Customs



- Information sharing with HMRC?



- Customs checks - anticipated for c. 5% of movements
 - Inland locations for checks?
 - Process itself not yet clear – fast track?
- Delays at ports
 - Bulk shipments – smaller impact
 - RORO/shipping containers – greater impact
 - 10 working days for shipments to go ahead as planned otherwise cancelled
 - Bond based on number of live loads – may increase if delays and exceed bond value?
- Using AEO accredited hauliers may help

Ports

- Changing port not an easy solution
 - Dependent on transport type e.g. bulk, RORO
 - TFS consent based on fixed exit port & transport routes – requires amendment
 - Additional cost of transportation changes
 - Contractual changes
- Availability of vehicles – backhauling
 - Decrease in supply will increase in costs



Contingency/Storage

- Additional private storage
 - Check permitted storage capacity
 - Could the EA temporarily increase storage limits?
 - Issues with insurance and fire prevention
 - Secure additional storage
- Other solutions
 - Centralised storage facilities?
 - Storage at landfill sites?
- Contingency contracts – landfill
 - Financial burden of difference in price
 - Some LA contracts limit landfill



Tariffs

Goods



Producer



Off taker

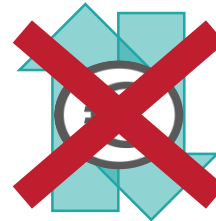
TRANSPORTATION



WORLD TRADE
ORGANIZATION



Services



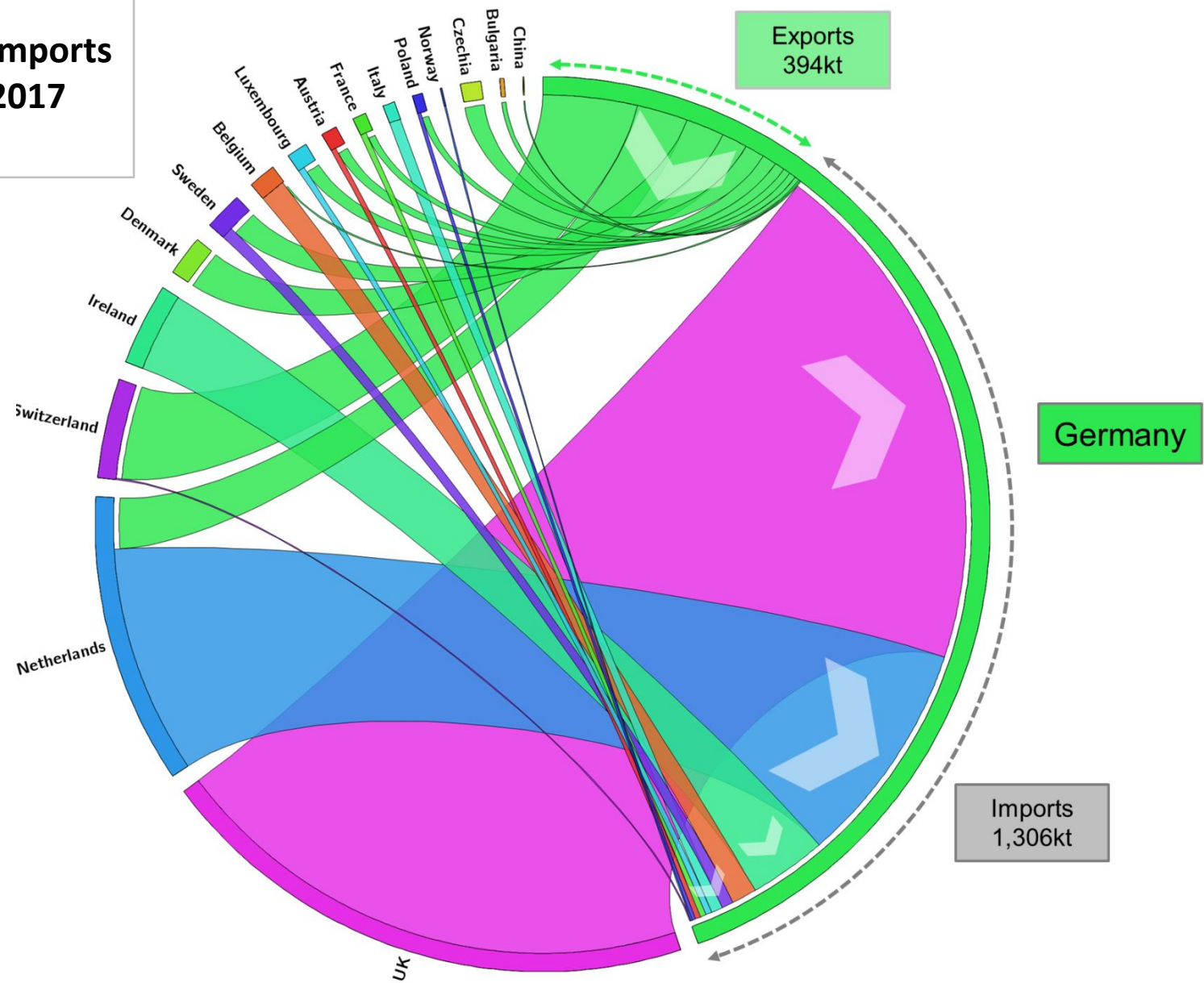
Department
for Environment
Food & Rural Affairs



HM Revenue
& Customs



**RDF/SRF Exports and Imports
from/to Germany, 2017**



Next steps...

- Operators should be thinking about:
 - Lobbying CAs who have not agreed to Article 17
 - Discuss fast-track with HMRC
 - Checking AEO status with hauliers
 - Consider contingency storage/disposal options
 - Engaging with EU customs teams re tariffs



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