



**RDF INDUSTRY GROUP: 10 YEARS OF THE EUROPEAN  
VOICE FOR WASTE DERIVED FUELS (WDF), CHAMPIONING  
STANDARDS, POLICY AND LANDFILL DIVERSION**

OCTOBER 2025



# FOREWORD

*A decade is a significant milestone in any journey. For the RDF Industry Group, it represents ten years of steadfast advocacy, pragmatic problem-solving, and a shared commitment to a better environmental outcome for Europe's non-recyclable waste. It is with immense pride that I reflect on the path we have travelled and the landscape we have helped to shape.*

*When our group was founded, the challenge was clear. The spectre of landfill loomed large, a default solution with unacceptable environmental consequences. We were founded on a simple yet powerful conviction: waste is a resource, and its value should be recovered, not buried.*

*Our approach has been deliberately pan-European. We saw not a collection of disparate national problems, but a single European challenge that demanded a collaborative, market-based solution. This philosophy found its most practical expression in the coordinated use of Energy from Waste (EfW) infrastructure across the continent. Where one nation had*

*a surplus of highly efficient recovery capacity (generating heat and power), and another had a deficit, we facilitated a partnership. In doing so, we weren't just 'exporting waste', but diverting it from landfill, allowing member states to collectively meet their environmental obligations in the most efficient way possible.*

*This pragmatic approach required a clear and credible voice for the industry, underpinned by robust evidence. We have consistently championed the research that quantifies the significant environmental and carbon benefits of diverting Waste Derived Fuels (WDF) from landfill to highly efficient EfW facilities. The data is unequivocal: this pathway saves approximately 10 million of tonnes of CO2 equivalent emissions each year, making a tangible contribution to our shared climate goals.*

*This evidence-led approach has been crucial in the corridors of power. On numerous occasions, we have faced down short-sighted calls to erect barriers and to ban the import and export of WDF,*

*whilst navigating the complexities of Brexit. We successfully made the case to policymakers that such measures would only serve to increase landfill, harm the environment, and stifle a functioning, beneficial market, ensuring the use of highly efficient existing infrastructure. Our influence has ensured that pragmatism has prevailed over protectionism, benefiting the entire resource management sector.*

*The strength of our conviction is reflected in the strength of our membership. From a handful of founders, we have grown into a proud collective of 41 member organisations representing the entire supply chain for waste-derived fuels across Europe. This growth is a testament to the clarity of our mission and the effectiveness of our work. Each member is a vital part of a coalition that has become the definitive voice for the sector.*

*This report celebrates the successes of those ten years. It is a testament to the vision of our members, the dedication of our secretariat, and the collaborative spirit of our*

*partners across the UK and Europe. While we rightfully celebrate our past, our work is far from over. The drive towards a more circular economy presents new challenges and opportunities, and we will continue to champion the need for shared infrastructure to underpin that goal.*

*I look back on the last ten years with profound pride, and forward to the next decade with unwavering optimism.*

**Andy Jones**  
**Chair, RDF Industry Group**



# RDF INDUSTRY GROUP OBJECTIVES

The RDF Industry Group is a pan-european trade association that defines its core purpose through several stated objectives:

## ■ Address Cross-Border Issues:

To explore and address the complex issues surrounding the movement of WDF across national borders within Europe, including related logistical, regulatory, and market topics.

## ■ Develop Evidence Base:

To generate and disseminate evidence-based information concerning the legal, environmental, and economic dimensions of WDF production, use, and export. This includes commissioning research and producing reports.

## ■ Industry Representation and Communication:

To act as a respected, informed, and expert voice for the WDF industry, communicating its work and positions to governments (national and EU), the European Commission, regulators, and other key stakeholders through various means such as reports, presentations, and consultation responses.

## ■ Facilitate Collaboration and Knowledge Sharing:

To provide a platform for members to network, share knowledge and experience, discuss challenges, and explore new market opportunities.

## ■ Support WDF Movement:

To actively support the legitimate and environmentally sound movement of WDF across Europe as a means of optimising resource recovery and landfill diversion.



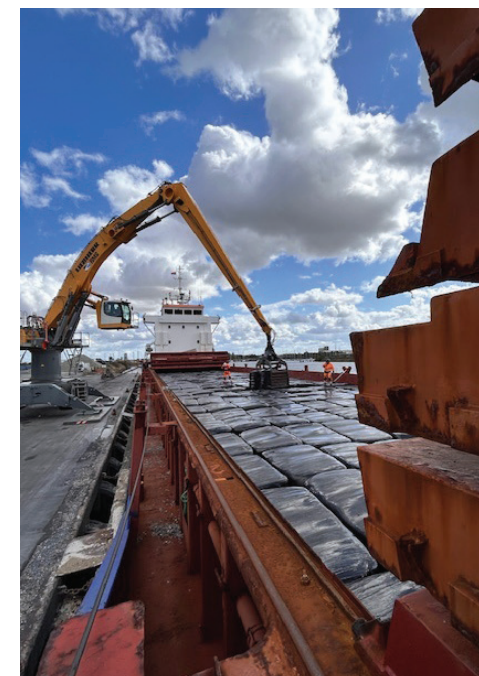
# 1. A DECADE OF PROGRESS



A decade of progress. Millions of tonnes of resources recovered. A pan-European market built on the principles of efficiency. The ten-year anniversary of the RDF Industry Group provides a pivotal moment to reflect on this journey and measure its impact.

This report serves as a comprehensive ledger of our achievements, documenting how a fledgling export market has transformed into a mature, highly regulated, and indispensable part of the waste sector, underpinning the circular economy. From shaping policy and dispelling myths surrounding waste crime to establishing our gold-standard Code of Practice, this document provides an evidence-based account of our collective impact.

Join us as we examine the critical decade from 2015 to 2025 — a period in which our industry not only grew, but proved its essential role in building a more sustainable future for the UK and its European partners.



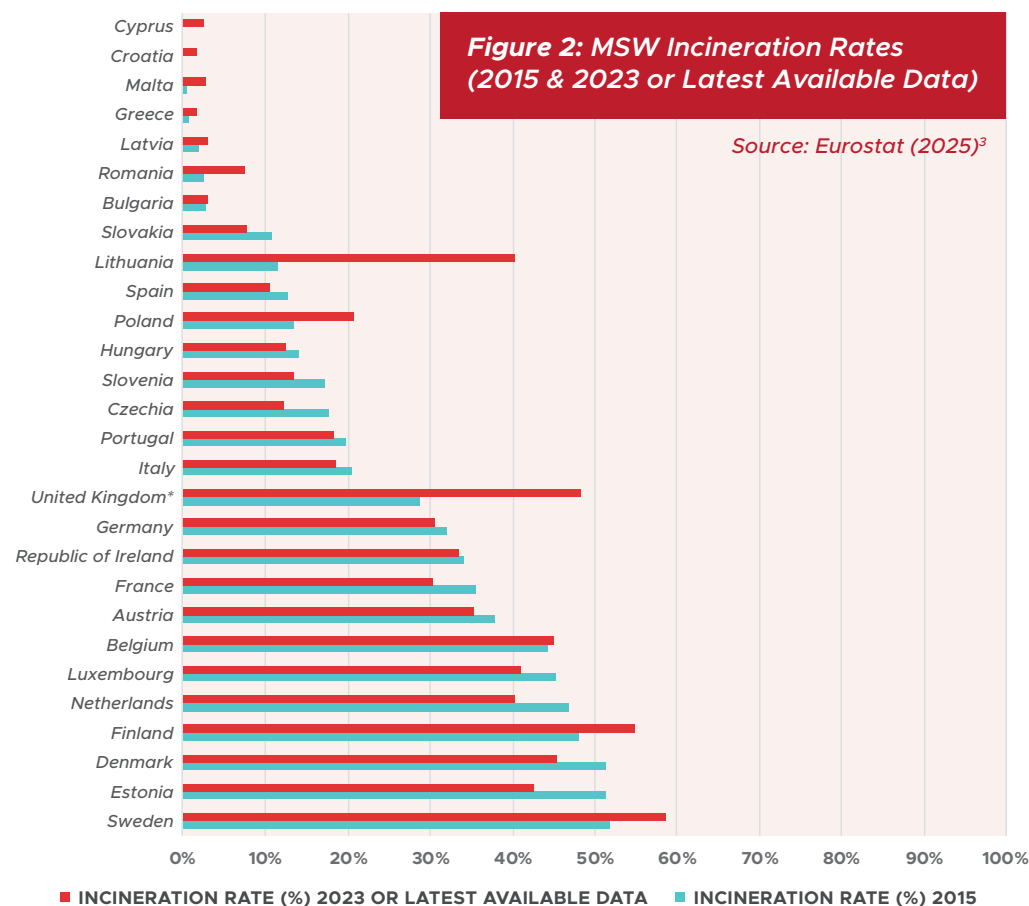
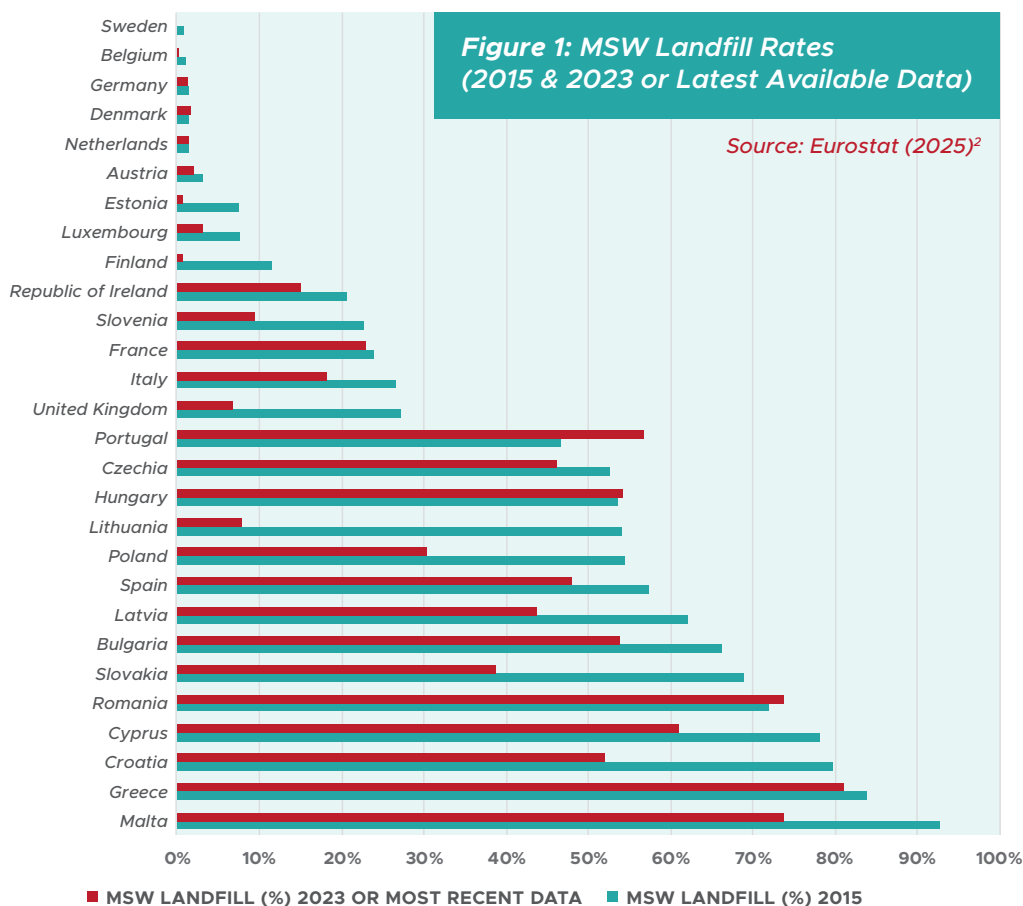
## 2. FROM HUMBLE BEGINNINGS

Leading up to 2015, the European waste management landscape was characterised by significant variation between member states. While some nations had well-developed waste infrastructure incorporating

high levels of recycling and energy recovery, many others, including the UK, had stubbornly low recycling levels, and remained heavily reliant on landfilling for residual waste disposal.<sup>1</sup>

Figures 1 and 2 compare European landfill and incineration rates in 2015 with the most recent data (2023). The results demonstrate a clear reduction in landfill use across nearly all countries and a moderate increase in EfW, especially in Central

and Eastern Europe where new facilities have been commissioned. Despite this progress, treatment performance still varies sharply — some European countries landfill over 50% of municipal waste, while others have almost no reliance at all.



\* United Kingdom incineration data derived from weighted national data, excluding Scotland

The implementation of the European Union's Landfill Directive (1999/31/EC) served as a significant catalyst for change, prompting a fundamental transformation of waste management practices across its member states. By mandating a progressive reduction in the biodegradable municipal waste sent to landfill, the policy created an incentive for member states to introduce policies and regulations to restrict landfill. Some nations implemented economic measures, such as landfill taxes. These were often deployed more rapidly than alternative policies to support other types of infrastructure, such as recycling and EfW facilities. This resulted in a domestic surplus of residual waste that required treatment and an economic incentive to avoid landfilling.

Concurrently, other member states faced a contrasting challenge: having already invested in significant EfW capacity, they experienced a decline in their own domestic residual waste arisings, leading to under-utilised facilities.

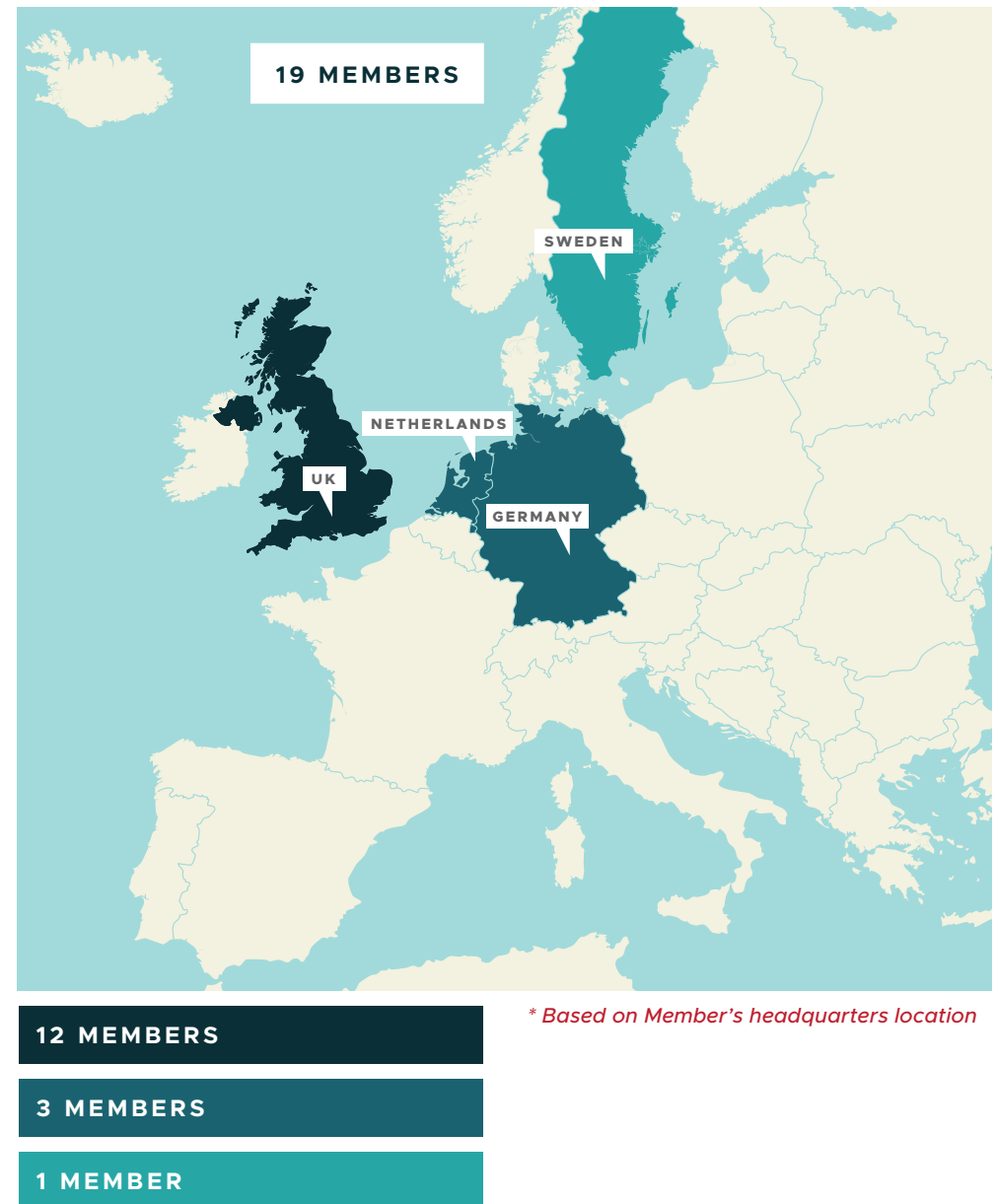
This divergence between waste availability and treatment capacity created the conditions for a new, market-based solution to emerge. Nations, such as the UK, with a surplus of residual waste

began exporting it as processed commodities, like Refuse Derived Fuel (RDF), to those with available EfW capacity. Consequently, the cross-border trade in these waste-derived fuels grew exponentially from negligible levels.

In response to this rapid market expansion and the evolving policy landscape, the RDF Industry Group was established in January 2015 to provide structure and guidance for this emerging sector. The Group's creation brought together key stakeholders from both sides of the market. The founding membership included major UK waste management companies alongside their essential off-taker partners in northern Europe, creating a platform to navigate the legal, environmental, and economic complexities of this vital trade.

While its origins were centred around the export of RDF from the UK, the Group quickly recognised the need for a broader perspective. The RDF market is inherently interconnected across Europe, influenced by EU-wide directives, differing national policies, and the logistics of waste movement between countries.

**Figure 3: RDFIG Membership\* (2015)**

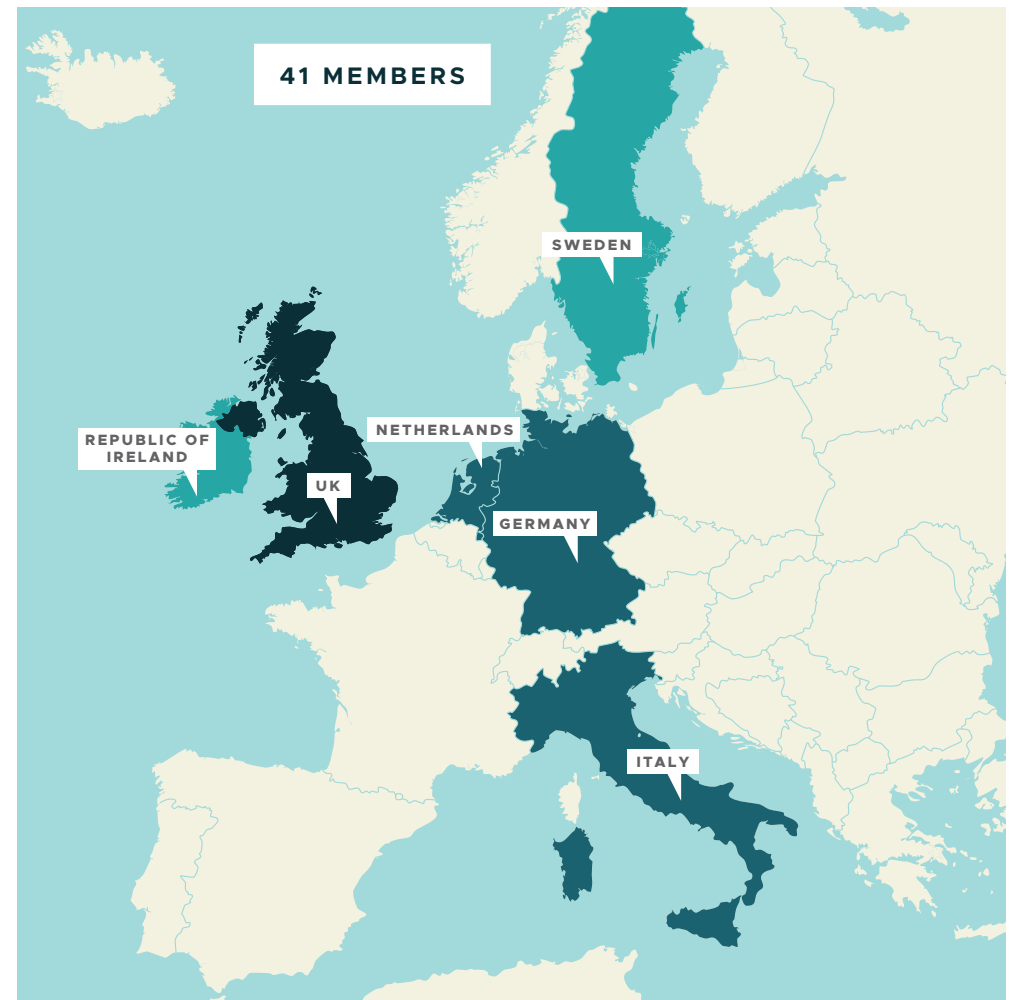


Consequently, the Group expanded its remit both geographically and materially. It evolved into a pan-European trade association, welcoming members from across the continent and representing operations in numerous EU member states and beyond. Its scope widened to officially cover all WDF, explicitly including both RDF and the higher-specification Solid Recovered Fuel (SRF). This expansion reflected the maturation of the market, where

SRF was gaining importance, and the reality that policy and market dynamics needed to be addressed at a European level. In 2025, the Group reached a milestone of 40 member companies, representing a significant portion of the European WDF market and encompassing the entire supply chain, including WDF producers, logistics providers (shipping and transport), testing services, and operators of EfW facilities.



Figure 4: RDFIG Membership\* (2025)



22 MEMBERS

5 MEMBERS

2 MEMBERS

\* Based on Member's headquarters location

# 3. SHARING IS CARING

The fundamental value of the cross-border WDF market lies in its elegant solution to a complex infrastructure challenge. The development of EfW facilities is a capital-intensive process, requiring significant investment and lengthy planning and construction lead times. It is simply not feasible for every nation to build out its full capacity of EfW in perfect

synchronisation with its landfill diversion goals.

The WDF supply chain provides the critical flexibility needed to bridge this gap. It allows for the optimal and efficient utilisation of existing assets across Europe. Nations that invested early in EfW capacity can offer their spare capacity as a vital outlet to neighbouring countries that are

earlier in their journey away from landfill. This enhances overall system efficiency, prevents the unnecessary burial of valuable resources, and ultimately accelerates the pan-European transition to more sustainable waste management.

In 2015, a total of 5.2 million tonnes of WDF were imported and exported by EU countries, including

the UK. The market at the time was heavily concentrated, with the UK being the largest exporter, accounting for over 60% of the total. The largest importers were the Netherlands (30%) and Germany (24%), which together received over half of all WDF shipments.

Figure 5. Top 10 RDF Exports by Country (2015)

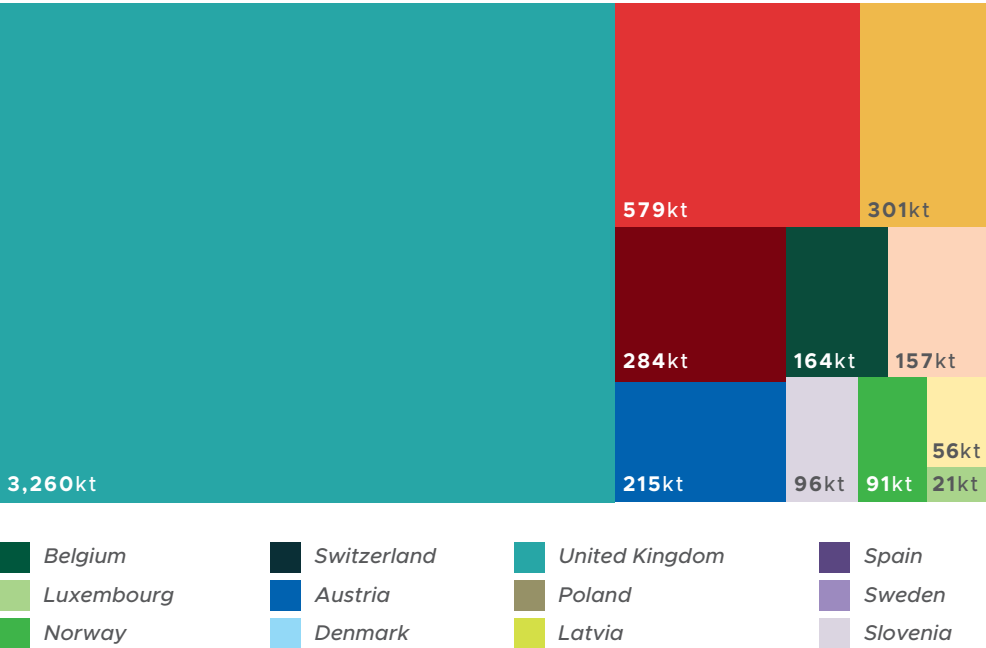
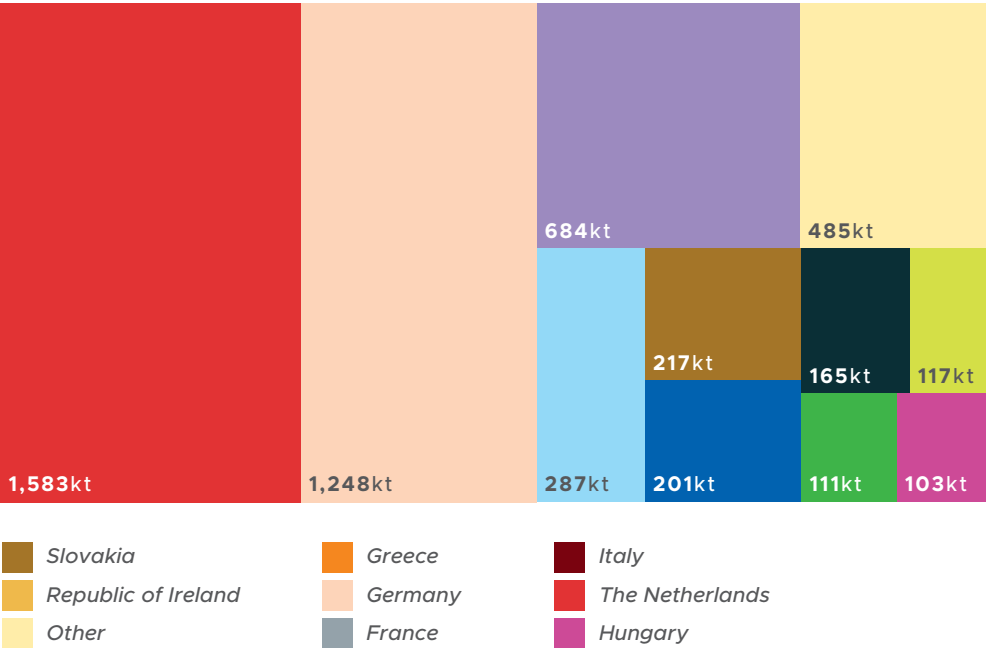


Figure 6. Top 10 RDF Imports by Country (2015)



Source: Eurostat (2025)<sup>4</sup>

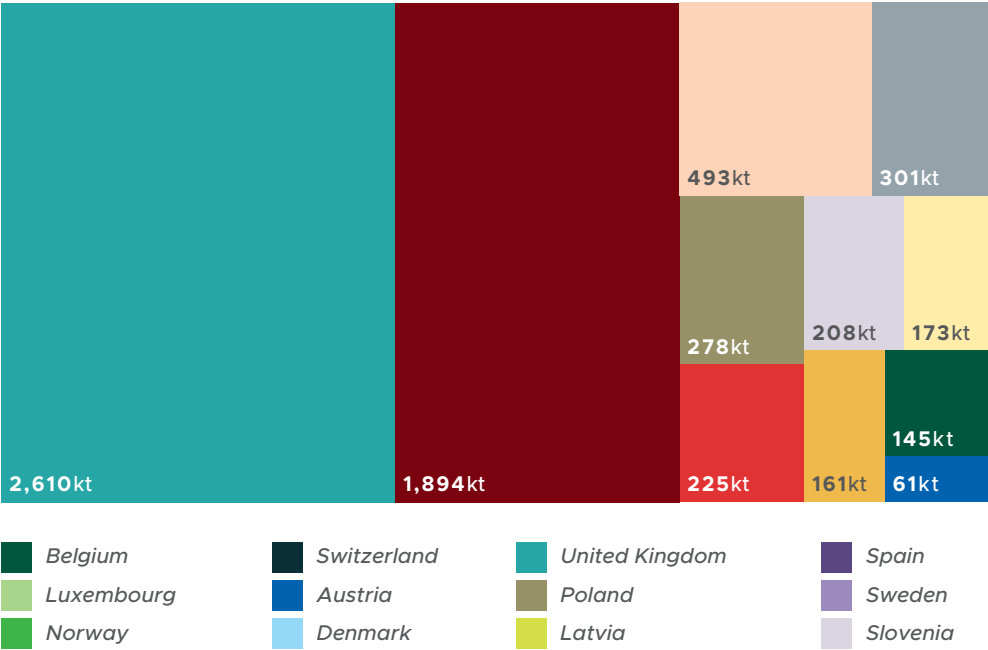
Source: Eurostat (2025)<sup>5</sup>

Over time, the market dynamics have changed, reflecting the growing maturity and sophistication of the WDF sector. Driven by shifts in capacity, policy and cost structures across Europe, the swift expansion of domestic EfW capacity in the UK has reduced export volumes, while new national taxes and import restrictions (such as those in the Netherlands) have rerouted traditional trade flows. At the same time, new exporting nations such as Italy have become

significant players, broadening the market base. This thriving industry is supported by a large and diverse number of businesses engaged in its activity, all contributing to robust and reliable international supply chains. This evolution is clear in the data. By 2023 (the latest available year), WDF exports and imports across Europe had grown to over 6.5 million tonnes, and the market had become more distributed and resilient.

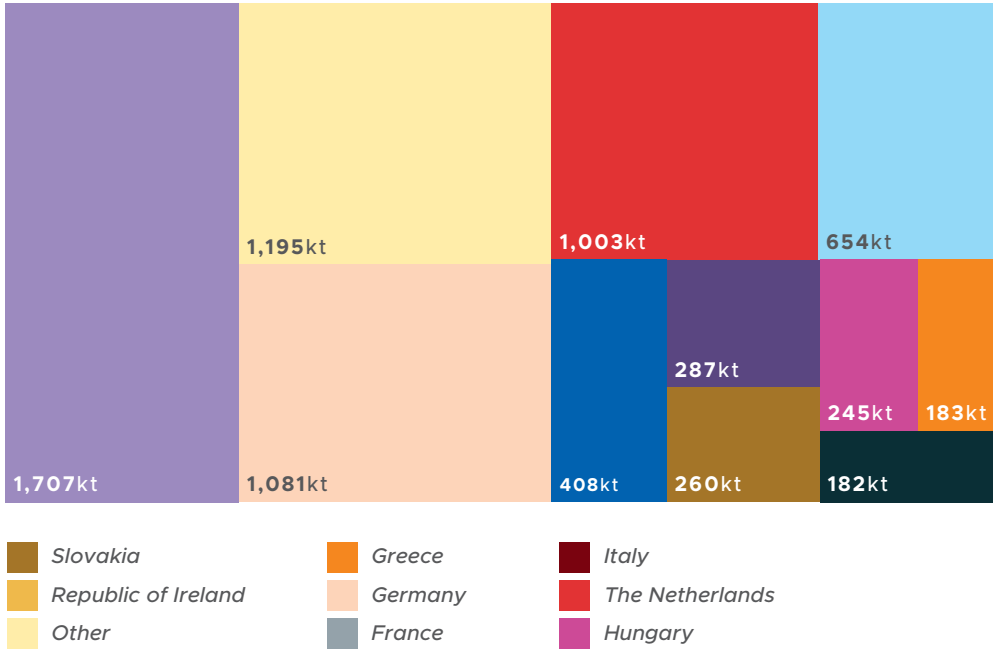
While the UK remained the top exporter, its share fell to 40%, with Italy emerging as another key exporter at 29%. The primary importers had also shifted, with Sweden (24%), Germany (15%), and the Netherlands (14%) then responsible for over half of all imports. This diversification highlights a dynamic and adaptable European market for WDF.

Figure 7. Top 10 RDF Exports by Country (2023)



Source: Eurostat (2025)<sup>6</sup> and Environment Agency (2025)<sup>7</sup>

Figure 8. Top 10 RDF Imports by Country (2023)



Source: Eurostat (2025)<sup>8</sup> and Environment Agency (2025)<sup>9</sup>

# CASE STUDY: THE UK'S LEADING ROLE IN EUROPEAN WDF SECTOR DEVELOPMENT

The UK played a key role in developing the European waste-derived fuel (WDF) market. The primary catalyst was the Landfill Tax, introduced in 1996, which steadily raised the cost of disposal and created powerful incentives to divert waste towards alternative treatment.

While domestic EfW capacity was concurrently developing, resourceful UK businesses identified a strategic European opportunity. They innovatively pioneered an export solution, building a vital 'bridge' to the well-established EfW facilities in countries like the Netherlands, Germany, and Sweden. This approach allowed the UK to rapidly decarbonise its waste sector.

By 2015, this export model had become a key element to the UK's waste management strategy, and accounted for more than 60% of all EU WDF exports. This remarkable growth sparked a dynamic and competitive marketplace. In a testament to the sector's dynamism, over 20 distinct businesses in the UK are involved in the preparation and export of WDF. The establishment of such a large and diverse group of operators has ensured the market is both mature and resilient.

A network of specialist companies seamlessly supports this ecosystem of exporters. An entire industry dedicated to logistics ensures the efficient and reliable movement of material,

while expert firms providing professional waste sampling and analysis guarantee that all exports meet the highest quality and regulatory standards.

This integrated and highly professional infrastructure has cemented the UK's status as an innovative leader in the European WDF sector.



## 4. THE CARBON DIVIDEND: A DECADE OF LANDFILL DIVERSION

At the heart of our decade-long mission lies a simple, powerful principle: every tonne of non-recyclable waste diverted from landfill through export pays a carbon dividend. For ten years, the RDF Industry Group has championed this cause, providing a vital pathway that turns a potential environmental liability into a tangible climate benefit. Our work has been driven by clear scientific evidence and a pragmatic approach to resource management.

### The Primary Dividend: Avoiding Methane Emissions

The primary antagonist in this story is methane ( $\text{CH}_4$ ). When buried in landfill, the organic fraction of waste decomposes without oxygen, releasing a potent greenhouse gas—more than 80 times more damaging to our climate than carbon dioxide over a 20 year period. The RDF Industry Group was founded on the evidence that a better, more responsible way existed.

We championed the solution: making use of available, highly efficient EfW capacity across

Europe as a crucial “safety valve.” This was not just about finding an outlet, but represents a strategic environmental pathway to facilitating diversion away from landfill when domestic EfW capacity is insufficient.

The climate benefits of this approach are not theoretical; they are quantifiable and substantial. According to a landmark 2022 study by Prognos and CE Delft, diverting one tonne of residual waste from landfill to an EfW facility prevents a staggering 1,791 kg of  $\text{CO}_2$  equivalent ( $\text{CO}_{2e}$ ) from entering the atmosphere. Applying this to the EU’s WDF exports and imports, this strategy has prevented an estimated **83.7 million tonnes of  $\text{CO}_{2e}$**  from being released between 2015 (the foundation of the RDF industry group) and 2023 (the latest available year of import/export data) alone.<sup>10</sup>

This direct prevention of methane emissions is a core objective that aligns perfectly with major international climate goals. The Global Methane Pledge, for instance, is a critical international agreement, led by the United States and the

**83.7 million tonnes of  $\text{CO}_{2e}$  equivalent to the emissions of the energy sector in the UK in 2022 or approximately 215,000 long-haul flights between London and New York**

European Union, aiming to reduce methane emissions by at least 30% by 2030 compared to 2020 levels. The Pledge recognises that rapidly cutting this powerful greenhouse gas is one of the single most effective strategies to slow the rate of global warming.

The WDF sector serves as a powerful, real-world example of this principle in action. Every shipment represents a tangible contribution to this global target — a direct prevention of damaging methane emissions that makes a measurable difference to our planet’s climate future.





## Pragmatism in a Circular Economy

The RDF Industry Group operates on the principle that effective waste management requires practical solutions for every tier of the waste hierarchy. Our focus is specifically on the residual fraction — the material left over after recycling has been maximised. While policy rightly prioritises waste prevention and recycling, the reality of current collection and processing systems is that a non-recyclable stream is consistently produced. Our role is to ensure this stream is managed in a way that is demonstrably better for the environment and the economy than landfill, which is the least desirable option.

## Decarbonising the Sector

We recognise the challenge posed by fossil-derived feedstock within WDF. Rather than resisting carbon pricing, the RDF Industry Group has adopted a proactive approach, embracing its role in driving innovation and helping members navigate the new landscape. This includes tackling the technical challenge of accurately determining the biogenic versus fossil carbon content in a heterogeneous fuel, a crucial step for fair and effective regulation.

Looking ahead, we see the integration of Carbon Capture, Utilisation, and Storage (CCUS) as the next frontier. This pathway, which our Group is closely monitoring and supporting, could transform our sector from a low-carbon solution into a source of carbon-negative energy — actively removing CO<sub>2</sub> from the atmosphere.

The story of the last decade is one of tangible achievements. It is a story of avoided emissions, a pragmatic underpinning of the circular economy and planning for the future. The carbon dividend is real, and it has been delivered. As we move forward, the RDF Industry Group remains committed to maximising that dividend, ensuring our sector continues to play a vital and positive role in a net-zero future.

## 5. CHAMPIONING COMPLIANCE: BUILDING A LEGITIMATE AND TRANSPARENT MARKET

In any rapidly growing market, perception can lag behind reality. The burgeoning export of WDF in the early 2010s was no exception. Sensationalist headlines have, at times, sought to conflate the highly regulated, professional trade of WDF with the criminal dumping and illegal export of other, unrelated wastes. This narrative, while compelling for a headline, fundamentally misunderstands the robust legal and financial frameworks that govern our sector.

From our inception, the RDF Industry Group recognised that tackling this misconception was not just a matter of public relations, but a foundational requirement for building a legitimate, sustainable market. It required us to draw a clear line in the sand between compliant, professional operators and any illicit activity. The principal tool for drawing this line has been our rigorous, member-enforced Code of Practice (CoP).

### **The CoP serves multiple purposes:**

#### **• Define and Promote Good Practice:**

It sets out a framework of recommended operational standards for each stage of the supply chain.

#### **• Assist Compliance:**

It acts as a guide to help operators comply with relevant legal and regulatory requirements.

#### **• Increase Confidence:**

It aims to build trust among customers, regulators, and the public regarding the industry's processes and products.

#### **• Prevent Illegal Activity:**

It helps distinguish legitimate, compliant operations from illicit activities, thereby combating negative perceptions associated with waste crime.

The CoP encompasses the entire WDF supply chain, from production through transport, storage, export procedures, and final recovery. It integrates mandatory legal

obligations with recommended best practices. Key areas covered by the requirements include:

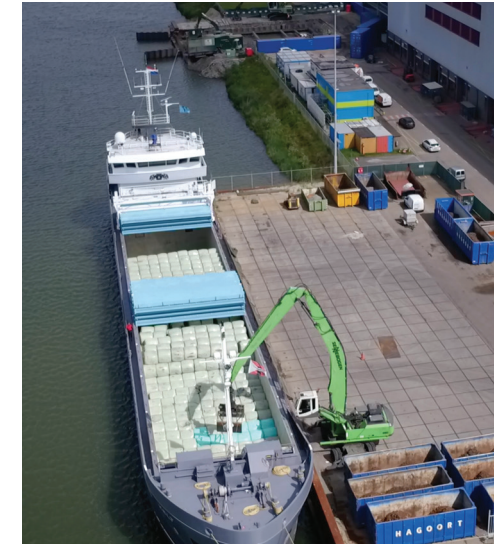
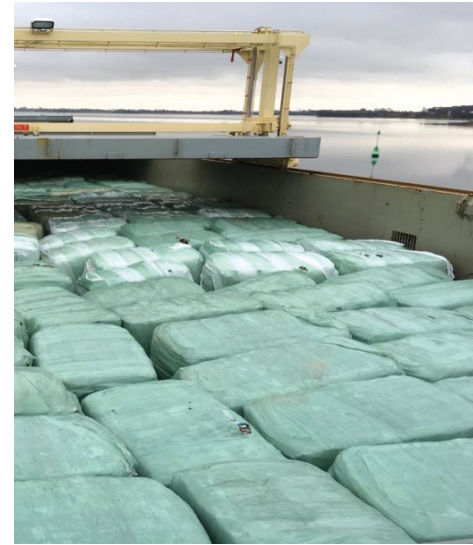
- Holding appropriate environmental permits and licenses.
- Adhering to Duty of Care principles for waste management.
- Implementing proper waste acceptance and inspection procedures.
- Ensuring secure preparation for transport (e.g., baling and wrapping).
- Complying with storage regulations (time limits, capacity, fire prevention).
- Using registered waste carriers.
- Following strict Transfrontier Shipment (TFS) notification and documentation protocols for exports.
- Ensuring recovery takes place only at appropriately permitted facilities (meeting R1 energy efficiency standards where applicable).

Commitment to complying with the relevant sections of the CoP is a condition of membership for the RDF Industry Group for UK members. The Group actively monitors and reports on member compliance, publishing annual dashboard reports. Notably, for the 2024 reporting year, the Group reported 100% compliance among its members, with no significant breaches recorded. This development and enforcement of the CoP can be seen as a significant exercise in industry self-regulation. The CoP allows the industry to demonstrate responsible operation to regulators and the public, thereby supporting the case for continued operation and trade.

Beyond our own robust self-regulation, there is a fundamental structural element of the WDF export process that provides a powerful, often overlooked, safeguard against crime: the mandatory financial bond.

Unlike the illegal dumping and illegal exports often depicted in the media, cross-border shipment of WDF under TFS regulations – the scope of which covers RDF Industry Group activities – requires the exporter to first provide a significant financial guarantee. This bond acts as a form of insurance for the regulators. Should anything go wrong – if the receiving facility cannot accept the material for any reason – these funds ensure that the waste can be returned and managed correctly without incurring any cost to the public purse. Any operator abandoning a shipment would not only face prosecution but would also forfeit their substantial bond. It is a system explicitly designed to prevent ‘dumping’, creating a level of security far beyond that of many domestic waste movements.

Given this, the narrative that paints WDF export as a shadowy practice could not be further from the truth. It is a trade defined by a twin-lock of security: proactive, industry-led self-regulation through our Code of Practice, and powerful, state-enforced financial accountability through the TFS bonding system. For ten years, our members have not just moved resources; they have built a framework of trust, transparency, and compliance. The result is a market that stands as a model of responsible international trade, a world away from the myths it has worked so hard to dispel.



## 6. SHAPING POLICY: AN EVIDENCE-LED VOICE



While building a compliant market from within creates a strong foundation, a stable and supportive policy environment is what enables that market to truly thrive and succeed.

From the outset, the RDF Industry Group recognised that proactive engagement with policymakers was not optional, but essential. Our sector operates at the intersection of environmental, economic, and international trade policy – a complex arena where misunderstandings or poorly designed regulations could undermine legitimate operations. We therefore positioned ourselves as a constructive partner and an essential conduit – a respected, informed, and expert voice capable of translating the on-the-ground realities of the WDF industry into clear, evidence-based recommendations for government bodies in the UK and EU.

This is not a passive role. Our approach is founded on a commitment to evidence-based advocacy, ensuring that our voice

is backed by robust data and research. We actively participate in shaping policy by submitting detailed responses to crucial government consultations on topics ranging from the expansion of the UK Emissions Trading Scheme (ETS) and Persistent Organic Pollutants (POPs) regulations to the sensitive issue of potential waste export bans. To inform these debates, we commission and disseminate independent reports that analyse the precise role of WDF in the energy transition, quantify its CO<sub>2</sub> reduction potential, and evaluate the real-world impacts of events like Brexit. This dedication to generating evidence ensures our advocacy is not based on opinion, but on a solid foundation of fact.

This evidence-led approach has enabled us to consistently champion several key policy positions that are vital to the sector's environmental contribution. Our primary focus has always been on strengthening landfill diversion, calling for robust landfill taxes as a prerequisite for driving waste up the hierarchy. As carbon pricing has come into

focus, we have advocated for a fair and logical application, arguing that if EfW is to be included in the ETS, then the far greater climate impact of methane from landfill must be priced with equal or greater force to create a true level playing field.

Crucially, we have consistently argued against blunt instruments like blanket export bans, promoting instead a policy of smart regulation that distinguishes between the legitimate, highly regulated WDF trade that optimises European infrastructure, and the illegal waste crime that all responsible operators condemn. Our goal has always been to help create a policy landscape that is not only stable and predictable but, above all, environmentally sound.

## 7. THE NEXT DECADE: PIONEERING LEADERSHIP

Our first decade was one of definition and delivery. We transformed a burgeoning trade into a mature, professional sector built on the pillars of quantifiable climate benefits, rigorous compliance, and evidence-led policy engagement. We have proven that exporting non-recyclable waste is not a problem, but a powerful solution — a strategy that has yielded a real carbon dividend by preventing millions of tonnes of methane from entering our atmosphere. Having established this strong foundation of trust and tangible achievement, the RDF Industry Group is now poised to lead the next evolution of our industry.

As we look to the future, our ambition extends beyond simply managing residual waste better. Our next chapter will be defined by pioneering the deep decarbonisation of our sector. The first decade's great success was tackling landfill methane; the next will focus on minimising fossil CO<sub>2</sub> emissions from the fuel itself, transforming our industry from

a low-carbon solution into a potential source of carbon-negative energy. We will be at the forefront for advocating of integrating CCUS with EfW facilities, championing a pathway that actively removes greenhouse gases from the atmosphere. We see a future where our members are not just diverting waste, but are integral players in delivering the negative emissions crucial for achieving a net-zero world.

This journey towards climate leadership will be matched by a deeper commitment to the circular economy. We will drive innovation in pre-treatment technologies to further improve the quality of waste-derived fuels and maximise the recovery of valuable materials before the energy recovery stage. By fostering collaboration and sharing best practices, we will help ensure that every possible component – from metals to minerals – is captured and returned to the economy, reducing our collective reliance on virgin materials.

The RDF Industry Group enters its second decade with a clear vision and unwavering optimism. We will build on our legacy as a trusted industry voice to become a proactive leader, shaping a policy landscape that rewards innovation and environmental excellence. Our commitment to compliance, transparency, and data-driven advocacy remains absolute.

The challenges ahead are significant, but the opportunities are greater still. We are ready to lead our sector into a new era – one defined not just by what we divert, but by what we create.



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