



Management of Hazardous Waste

The situation

The revised Waste Framework Directive puts the Waste Management Hierarchy at the heart of responsible management. This means that all waste, including hazardous waste, must be dealt with in the right order of priorities. Even after every other option has been explored, sending hazardous waste to landfill is seriously restricted by the Landfill Directive. What's more, waste can only be accepted at landfill if it meets the EU regulations on Waste Acceptance Criteria (WAC)*.

The EU granted the UK partial derogations from the limits on hazardous waste treatment and WAC. These derogations apply to regulations that couldn't be met because the infrastructure wasn't in place to process the waste in the right way when the law was introduced. Although the derogations were only expected to last for a limited period, WAC limits that were relaxed in 2003 are still permitted today.

* This is a set of tests that mean the waste is suitable for the Landfill design, in order to protect the environment and health.

The seven key issues

1. Food waste collection and processing
2. Mixed material (co-mingled) collections
3. Mixed plastics collections
- 4. Management of hazardous waste**
5. Energy efficiency and incineration
6. Renewable energy and district heating
7. The End of Waste criteria

Relying on dilution is a backwards step for hazardous waste management.

We think it's time to raise the bar.

Where we Stand.



We applaud the idea of a **waste hierarchy** for all waste – including hazardous materials. However, while the hierarchy is a good indicator of **environmental performance**, we don't believe it goes far enough. For example, it doesn't take into account the **characteristics of a waste stream**, the level of contamination in the waste or the technology used to treat it.

Our position is that hazardous waste should be treated to remove the hazard, or place it beyond harm. We're also opposed to dilution in the treatment of hazardous waste.

In our view, supporting new 'recycling' techniques that rely on dilution is a huge backwards step for hazardous waste management in the UK. It's certainly counter to the DEFRA strategy, which promotes 'raising the bar', something we support 100%.

That's why it's absolutely critical that the waste hierarchy is used in combination with lifecycle thinking to ensure the best environmental option is chosen. This position is a requirement of the revised Waste Framework Directive and is supported by DEFRA's strategy for hazardous waste.¹

We welcome the eventual removal of derogations. Ultimately, it will result in new treatment technologies and management techniques that will improve the environmental performance of hazardous waste management. But without a timeline and clear plan, current practices simply won't change. What's more, investing in the technology that will make our cities sustainable will be considered too risky while the derogations remain in place.

Leniency is not an option for sustainable cities. We need tighter controls to ensure that facilities are not permitted to accept waste that will only be diluted through the treatment process, without removing the associated hazards. It's a principle we believe should be enforced consistently and with clear timelines for full regulation. Lifecycle thinking must also track any contaminants through the entire life of the material to determine their ultimate fate.

¹A Strategy for Hazardous Waste Management in England DEFRA, March 2010



Where do you stand?

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