

# Recycling Incinerator Bottom Ash



October 2013

## At a Glance.

The UK government incentivises the use of recycled aggregates through the Aggregates Levy. This £2/tonne tax on virgin aggregates reflects the environmental cost of extraction. What's more it doesn't hinder British competitiveness because exports are relieved and imports are taxed at first use.

Since its introduction in 2002, the Levy has continued to play an important part in encouraging the re-use of aggregate materials such as Incinerator Bottom Ash (IBA).

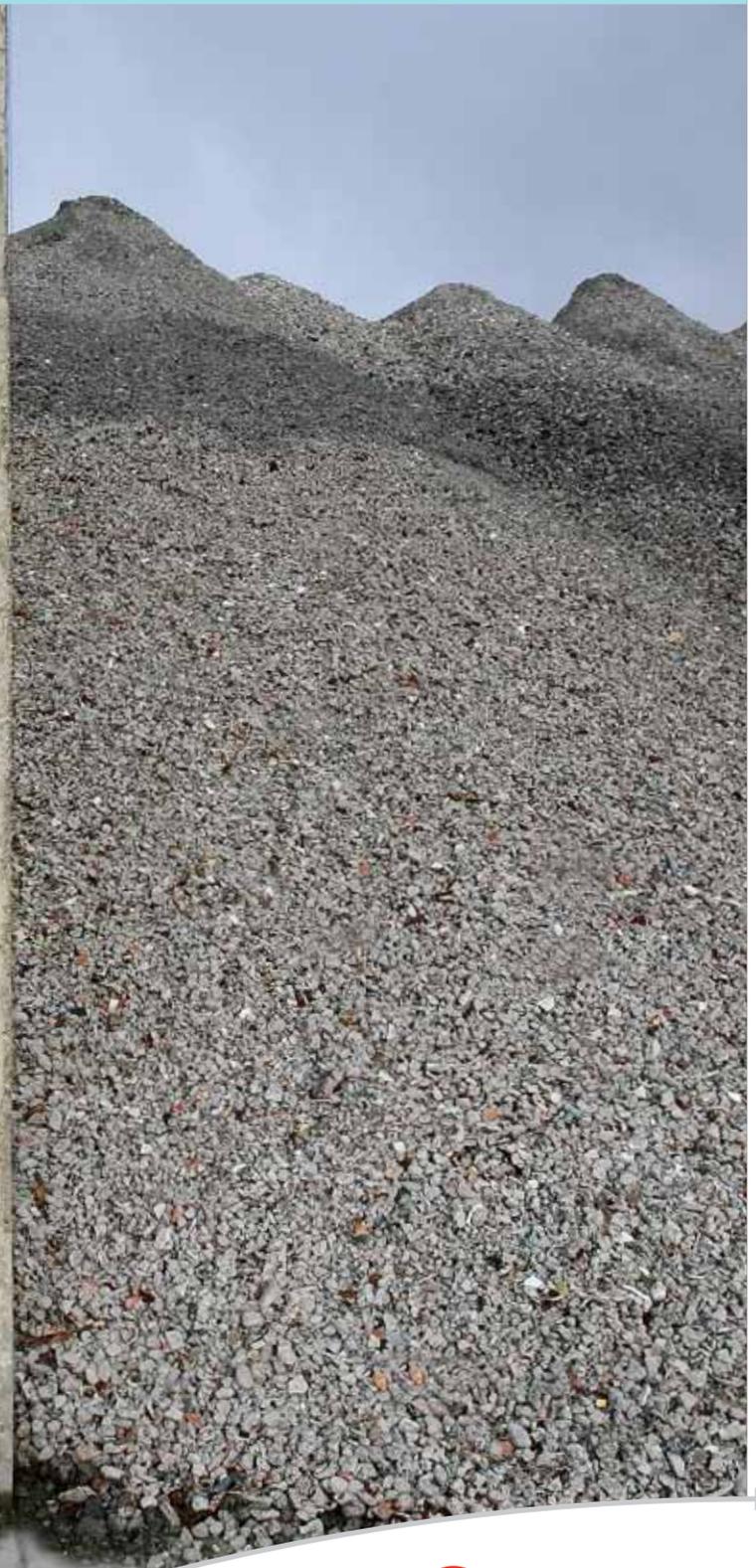
## Where we Stand.

Veolia Environmental Services believes the UK government is right to incentivise the use of recycled aggregates.

All Veolia's Energy Recovery Facilities recycle IBA.

Following the testing campaign, we believe that it is safe to consider IBA as non-hazardous and that the frequency of testing should be reduced.

Veolia would also welcome IBA being counted in recycling figures as it constitutes a valid use of material.



# The Situation.

The test results for Veolia Environmental Services are below the maximum number of times that limits can be exceeded, initially set at a maximum of six over any 12 months period.



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Recycling IBA presents many environmental benefits:

- **It avoids landfilling, leaving space available for other wastes**
- **It reduces the carbon footprint of waste management by producing a valuable secondary aggregate locally.**
- **IBA also has a useful pozzolanic (cement-like) property, enhancing its performance over virgin aggregates.**

The other advantage of IBA is that it is non-hazardous. Veolia Environmental Services has worked closely with the Environment Agency (EA) to develop the best protocol for assessing the status of IBA – for existing Energy Recovery Facilities (ERFs) and those that have

yet to be built. It is believed that complaints about its non-hazardous-status are mainly driven by anti-incineration agendas.

A campaign of frequent testing was launched two years ago to define the status of IBA. The results from all UK ERF facilities over the two years have now been published. The test results for Veolia Environmental Services are below the maximum number of times that limits can be exceeded, initially set at a maximum of six over any 12 months period.

# Where we Stand.

Veolia Environmental Services believes the UK government is right to incentivise the use of recycled aggregates.



Following the testing campaign, we believe that it is safe to consider IBA as non-hazardous and that the frequency of testing should be reduced.

All our ERFs recycle their IBA. Although all our plants are operated by third parties, some of the IBA facilities are on our own sites and in some contracts we have a share in the sales of the final products.

However, although IBA is safe to use, it is our view that we must be sensible about End of Waste (EoW) status.

IBA can be used in two major applications. Unbound it can be used for bulk fill and sub bases. When bound it's ideal for road paving, cement and construction blocks.

In a report published in May 2002, the EA declared that these applications did not pose a threat to the environment or human health. It also recognised that IBA has the potential of a valuable secondary aggregate. The use of IBA in building blocks was thoroughly tested and the results confirmed it was safe to use in this application.

Veolia fully supports the conclusion in the report. Nevertheless, since its publication, the EA has started looking at EoW criteria for IBA. We believe that this should be based on a clear protocol and quality standards for reuse.

Currently our contractors notify the EA about every application they sell the aggregate into. We support this case-by-case approach for two reasons:

- Without it we would lose the traceability of applications and we do not want to be the starting point for a wrong use of IBA.
- The EA would also have to set general rules about where IBA can or cannot be used. This would rule out applications where there is no risk, but miss out on potential risks that would have been picked up by a case by case approach.

Should IBA achieve End of Waste status, then the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) criteria should apply.

Veolia would also welcome IBA being counted in recycling figures as it constitutes a valid use of material. It is our assertion that National Accounting issues (double-counting recovery and recycling) can be overcome. What's more, the valid application of IBA into construction applications is a useful inclusion in the national recycling achievement. Other European administrations have adopted this approach in their strategic approach to waste management and we believe the UK should follow.



Where do you stand?

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