



Department  
for Environment  
Food & Rural Affairs

# Resources and Waste EU Exit No Deal Contingency Planning Stakeholder Meeting

10<sup>th</sup> January 2019

***The information in this slide pack is accurate as of 10<sup>th</sup> January 2019***

# No Deal: What could possibly go wrong?

What could possibly go wrong?

Graham Winter  
Environment Agency  
January 2019

# Basic planning assumptions

➡ 3-6 months of significant disruption (mainly Eng ↔ France)

**Why?**

**Where?**

**Consequences?**

# What do we know about our waste exports?

⇒ UK exports around 6.5 mt per year to EU

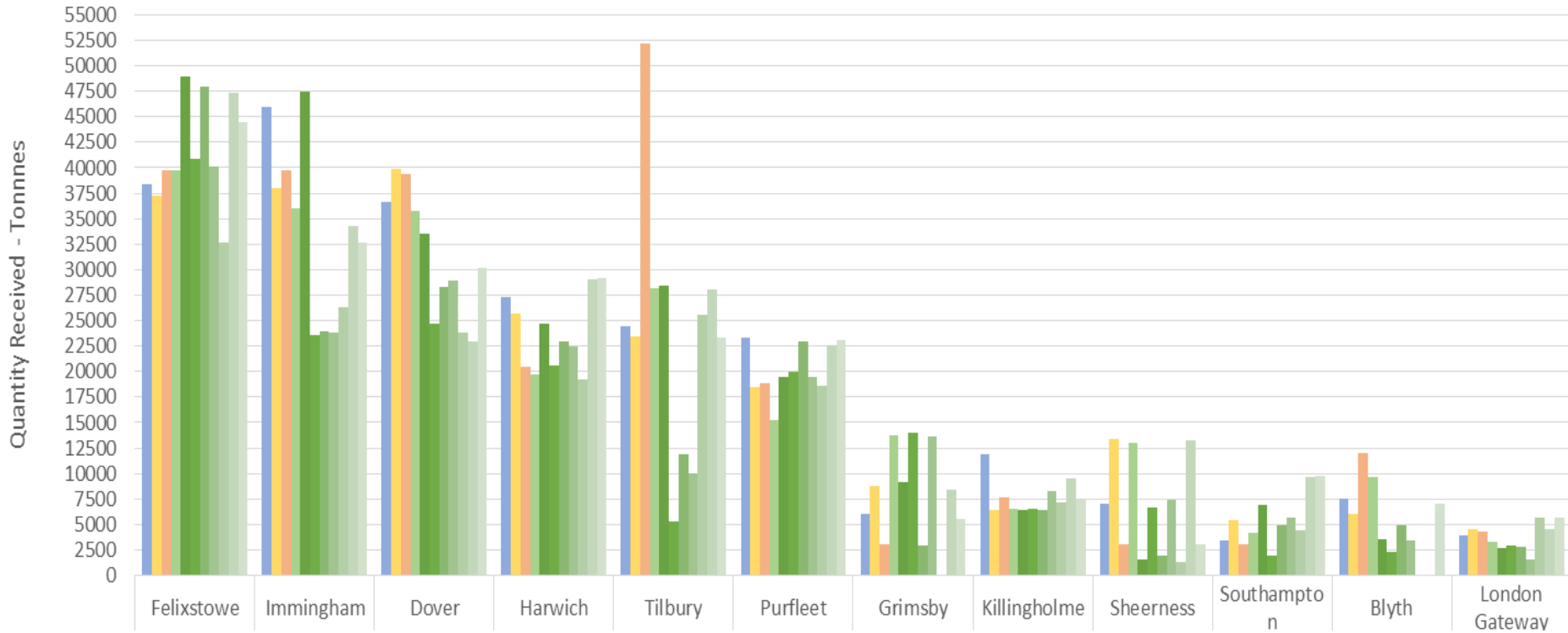
⇒ Notified Waste:

⇒ ~3.4 mt RDF

⇒ Non-notified waste

⇒ ~3.2mt (ferrous 56%, paper 20%, glass 9%, others < 4%)

# RDF Exports: Major ports



# RDF Export: No Deal Preparations

*Defra Stakeholder Event  
January 2019*

*Bethany Ledingham,  
RDF Industry Group Secretariat*



# Agenda



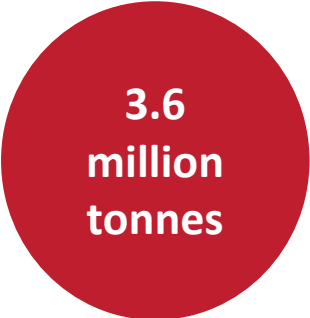
- RDF Industry Group
- Impact on RDF supply chain
- Issues and actions
  - Notifications
  - Customs
  - Ports
  - Contingency/Storage
  - Tariffs



# RDF Industry Group







Of RDF exported



Of UK residual waste is  
exported



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?

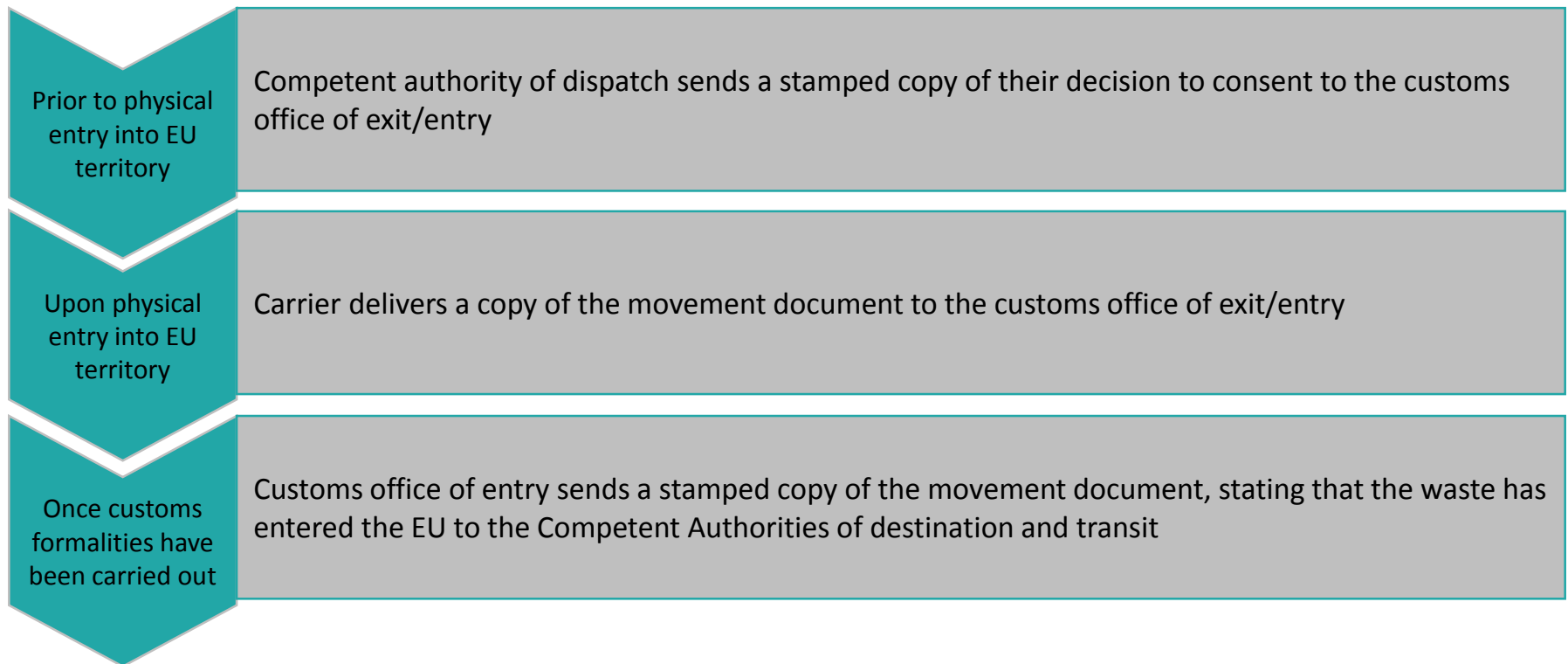


# Notification Process



- 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



TRANSPORTATION



WORLD TRADE ORGANIZATION



Services



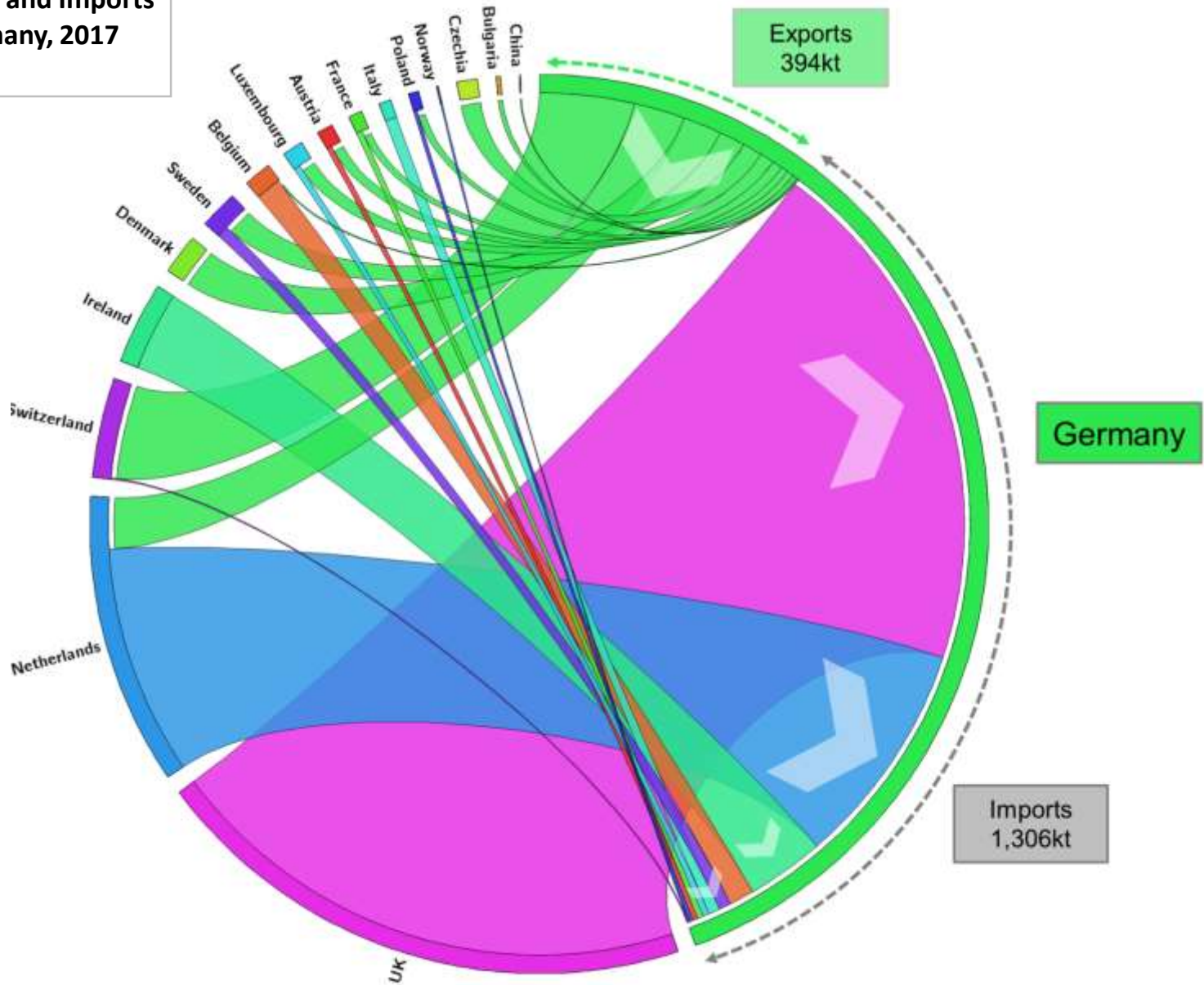
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HM Revenue  
& Customs



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



Source: Eunomia, based on Eurostat data

# 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



[www.rdfindustrygroup.org.uk](http://www.rdfindustrygroup.org.uk)



**rdfindustrygroup@eunomia.co.uk**

# Contingency planning

Graham Winter  
Environment Agency  
January 2019

# Environment Agency Preparations

- ⇒ Role – advisor, regulator
- ⇒ Competent Authority –
  - ⇒ Consenting process
- ⇒ D1R
- ⇒ Contingency planning
  - ⇒ Considering the things that we may need to prepare for and respond to
  - ⇒ Drawing on work from Asian market restrictions

# Incident Management Approach

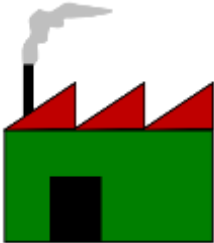


- ➔ Treating No Deal planning as an 'incident'
- ➔ Prioritises actions
- ➔ National and local teams





# Where will it go wrong?



# Where will it go wrong?



# Landfill void space (in theory)

Landfill Type	Region									ENGLAND
	North East	North West	Yorks & Humber	East Midlands	West Midlands	East of England	London	South East	South West	
Hazardous Merchant	7,059	6,409	2,666	948	-	-	-	196	1,480	18,759
Hazardous Restricted	-	150	-	-	535	-	-	23	-	708
Non Hazardous with SNRHW cell*	4,014	8,637	1,677	18,072	10,010	5,904	-	30,498	4,043	82,855
Non Hazardous	6,937	17,734	41,614	13,456	32,360	25,798	2,536	17,661	10,501	168,597
Non Hazardous Restricted	-	4,912	15,738	3,525	108	1,500	-	-	-	25,784
Inert	10,737	5,827	14,136	22,795	14,377	18,459	344	29,121	9,386	125,182
Total	28,747	43,669	75,832	58,796	57,390	51,661	2,880	77,500	25,410	421,884

# Things to consider

- ⇒ Border restrictions/controls
- ⇒ Need for alternative routes/markets
  - ⇒ Logistics, permits
- ⇒ Need for storage options
  - ⇒ Permits, FPP
- ⇒ Need for disposal options
  - ⇒ Availability, cost, permitting
- ⇒ Impacts on contracts or targets
- ⇒ What else????

# Regulator Role: what we can consider

- ⇒ National Regulatory positions (and local positions)
- ⇒ Permitting and consenting
- ⇒ Compliance
- ⇒ Assessing capacity
- ⇒ Responsive to issues as they arise
- ⇒ Supporting local needs

# Summary

- ⇒ Collating issues and concerns
- ⇒ Preparing for worse case
- ⇒ Ready to respond