

WASTE SHIPMENT REGULATION REVIEW

CEMBUREAU Position

September 2021

CEMBUREAU, the European Cement Association, welcomes the upcoming review of the Waste Shipment Regulation (WSR).

The European cement industry is a large user of waste and by-products utilizing approximately 36 million tonnes per year to replace fuels and raw materials. In the EU, the sector substitutes on average 48% of its fossil fuel thermal energy consumption with secondary materials such as non-recyclable waste or biomass waste.

As explained in our [Carbon Neutrality Roadmap](#), our industry has high ambitions to increase this number in the coming years. The replacement of fossil fuels by non-recyclable and biomass waste, and the use of alternative raw materials, will deliver 15% of the emissions reduction in the cement industry between now and 2050. In 2018 alone, 21.7 million tonnes CO₂ emissions were avoided through the use of alternative fuels in the European cement industry. There is no technical impediment to increasing significantly the use of non-recyclable waste and biomass waste in cement production, and several cement plants across Europe already run on 90-100% alternative fuel share.

When it comes to the review of the WSR, CEMBUREAU fully supports the Commission's approach to support the re-using and recycling of waste, where possible, and to minimise the export of waste outside of the EU. We also would like to highlight the advantages brought by co-processing for waste which are not recyclable and would otherwise be incinerated or landfilled.

1. The WSR should make a distinction for the shipments of waste where they directly replace the use of raw materials or fossil fuels in the industrial process

When waste is introduced into the cement kiln to produce clinker (the intermediate product of cement), its organic component provides heat inside the kiln whereas the mineral, non-combustible elements are recycled and become part of the clinker, thanks to what is called "*co-processing*". Co-processing is therefore an absolutely sustainable ecological solution for the treatment of waste, as it uses waste both as a way to provide energy and as secondary raw material. It provides a sound solution for the waste streams and strengthens the circular economy, in addition to delivering CO₂ emission reductions as highlighted above.

In light of the importance of industrial decarbonisation to meet the objectives of the European Green Deal, CEMBUREAU would therefore support an approach for a **distinction for the shipments of waste that are deemed to replace fossil fuels in industrial processes (such as co-processing)**. Such solution would greatly facilitate the access to non-recyclable waste and biomass waste by cement companies and allow for significant CO₂ emissions reduction throughout the value chain.

2. Facilitating administrative procedures on waste shipment and ensuring a coherent WSR implementation

In addition, CEMBUREAU would like to share the following comments:

- The primary goal of the European cement industry is to establish/further develop local waste management solutions and sourcing options, as this brings locally the most benefits (economic, environmental).
- The waste imports in alignment with the Waste Shipment Regulation should always be possible and the European cement industry commits to highest safeguards and to support the further development of the WSR, so as to ensure the respect for highest environmental standards and supports fast and decisive prosecution of any misconduct.
- As CEMBUREAU, we believe that the revision of the rules should tackle the non-harmonised approaches and interpretation of the WSR provisions and procedures in different Member States, which were highlighted in the recent WSR evaluation. Many cement facilities have faced severe disruptions in the waste movement and significant impact in their operation, due to the poor application and the different interpretation of the rules among the Member States. More specifically, the poor application of the WSR provisions in one Member State has even led individual cement companies to stop the import of waste (alternative fuels) and to limit or ban the use of imported waste from local suppliers. In other Member States, the extreme time delays above the legal frame which is foreseen in the WSR for the management of the notifications by the authorities, resulted for the cement plants to use raw materials or fossil fuels instead of waste. Therefore, the potential technical capacity of the cement plants in some Member States to replace traditional fossil fuels and raw material with waste, contributing to the proper waste management across the EU and to the carbon neutrality commitments, remains untapped.
- We believe that more effort should be made towards a wider application of the existing Waste Shipment rules described in the WSR such as the “pre-consent” process, rather than creating a new procedure.
- With regards to the reducing the administrative burden, we would be very much in favour of an electronic procedure to substitute the paper-based procedure and the WSR revision is a perfect opportunity towards this effort.

CEMBUREAU looks forward to being part of the discussions on the WSR revision.
