

**CEMBUREAU FEEDBACK TO THE DRAFT COMMISSION DELEGATED REGULATION (EU) .../... & ANNEX AMENDING ANNEXES III, IIIA, IV, V AND VIII TO REGULATION (EC) NO 1013/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON SHIPMENTS OF WASTE**

*Brussels, 20/07/2020*

The European cement industry is a large user of waste and by-products utilizing approximately 35 million tonnes per year. In the EU, the sector substitutes on average 46% of its fossil fuel consumption with secondary raw materials such as non-recyclable waste or biomass waste. Our industry has high ambitions to increase this number in the coming years, and several cement plants across Europe already run on 90-100% alternative fuel share.

In addition to providing sound solutions for the waste streams and strengthening the circular economy, this use of alternative fuels is also key for the cement industry to reduce its CO<sub>2</sub> emissions and support our vision for a carbon neutral Europe for 2050 (<https://cembureau.eu/news-views/publications/2050-carbon-neutrality-roadmap/>). 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.

That is why, having access to sufficiently available local pre-treated waste is crucial for the operation of cement facilities in all member states. However, import of pre-treated waste becomes necessary when local supply does not match quality and quantity requirements.

That is why CEMBUREAU supports the draft Commission delegated act which maintains the current simplified procedure for shipments of non-hazardous plastic waste between Member States.

Thus, CEMBUREAU would like to highlight three positive consequences of the draft delegated act:

1. It avoids internal barriers in the EU internal market when these waste streams are destined to industrial applications;
2. It does not add administrative burdens neither to Member States and not to companies;
3. It prevents the development of illegal waste transfers.

Finally, CEMBUREAU wishes to underline that the use of waste in cement plants is done in full compliance with the EU air pollution legislation (Directive 2010/75/EC on industrial emissions) ensuring a high level of protection of human health and the environment. Each and every cement plant in the EU operates in accordance with a permit granted by the authorities in the Member States following the principles and provisions of the IED.

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