

CEMBUREAU's feedback to the Waste Shipment EU rules revision

CEMBUREAU, the European Cement Association (www.cembureau.eu), welcomes the Inception Impact Assessment and the opportunity to provide feedback to the Waste Shipment rules revision.

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 CO₂ emissions and support our vision for a carbon neutral Europe for 2050.

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. The potential of co-processing should be enhanced further through legislative and regulatory measures that recognise this form of material recycling and its contribution towards EU recycling targets.

Having access to pre-treated waste is crucial for the operation of cement facilities. CEMBUREAU therefore considers that the upcoming Waste Shipment rules revision offers a unique opportunity for promoting the further use of secondary raw materials in the cement facilities, and ensuring greater access to waste streams:

- CEMBUREAU strongly believes that the revised rules should favour shipments for recycling over forms of energy recovery, and in that aspect the shipment of waste for co-processing should be favoured over simple energy recovery. This will be a decisive factor towards a clean and circular cement industry and deliver deep CO₂ emissions cuts in our sector.
- The revision of the rules should tackle the non-harmonised approaches and interpretations of the Waste Shipment Regulation (WSR) provisions and procedures in different Member States, which were highlighted in the recent WSR evaluation. 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.
- The revision is also an opportunity to facilitate waste transfers through simpler administrative measures. For instance, we would be very much in favour of an electronic procedure to substitute the paper-based procedure which has been identified as an obstacle causing administrative burden, during the WSR evaluation.
- Last but not least, CEMBUREAU believes that the export of waste outside of the European Union should simply be minimized. The review of the rules is an opportunity to ensure that this happens.

CEMBUREAU looks forward to being part of the discussions on the review of the Waste Shipment Regulation.