

Plastics exports and the impact of recent events

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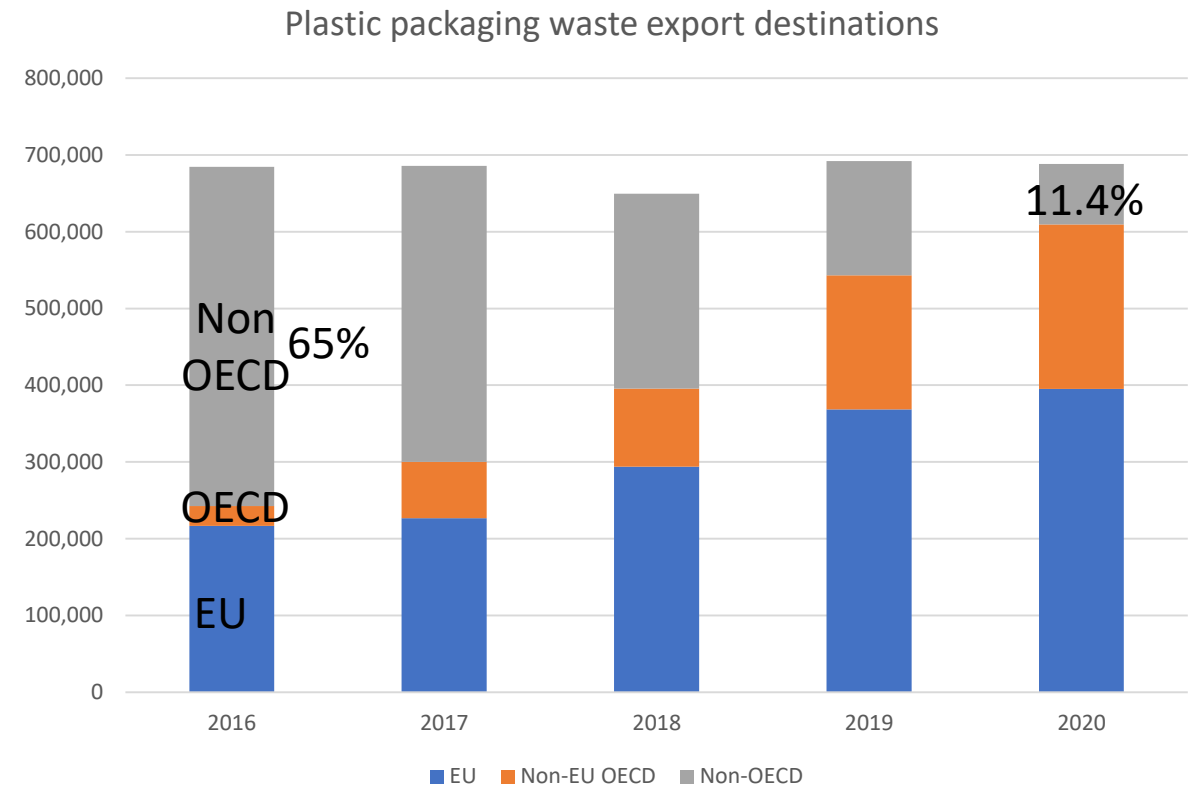
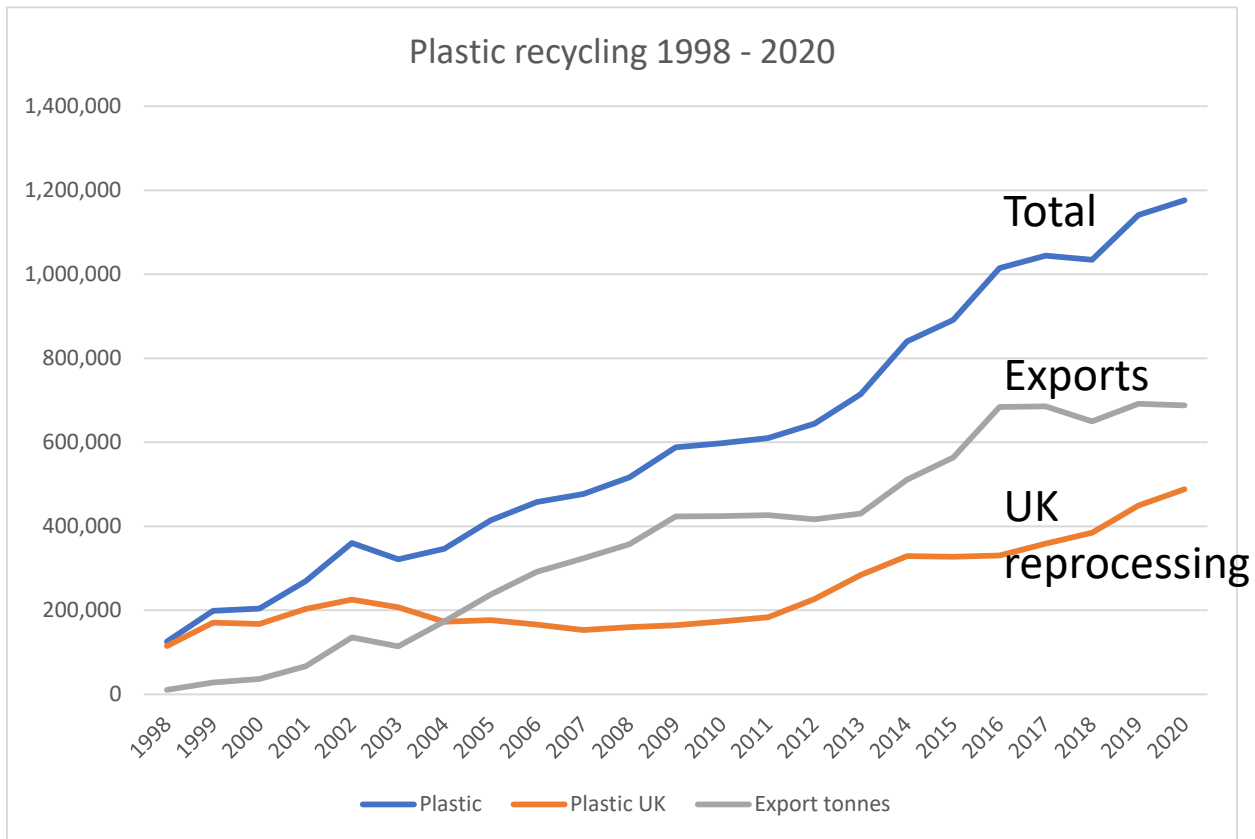
- Waste legislation consultancy since 2008
- Provide support to businesses on producer responsibility, permitting exports etc
- Chair ACP 2015-2020
- Chair WEEE AATF Forum



Topics

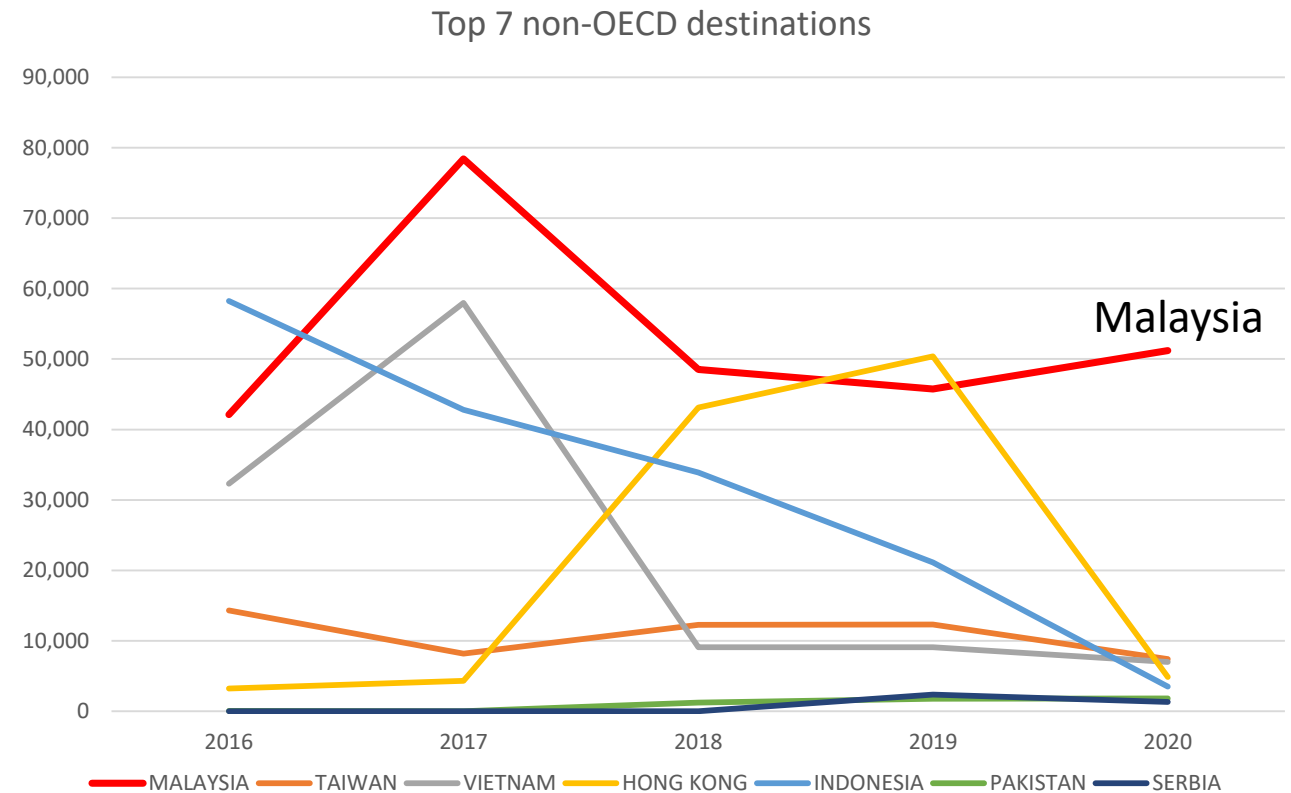
- Plastic export market changes over the last 5 years
- Implications of the expected ban to non-OECD
- Increasing restrictions on OECD (recent Turkish bans)
- Basel convention changes
- NI protocol
- Other implications of Brexit
- Future infrastructure issues

Plastic packaging waste recycling



Non-OECD destinations

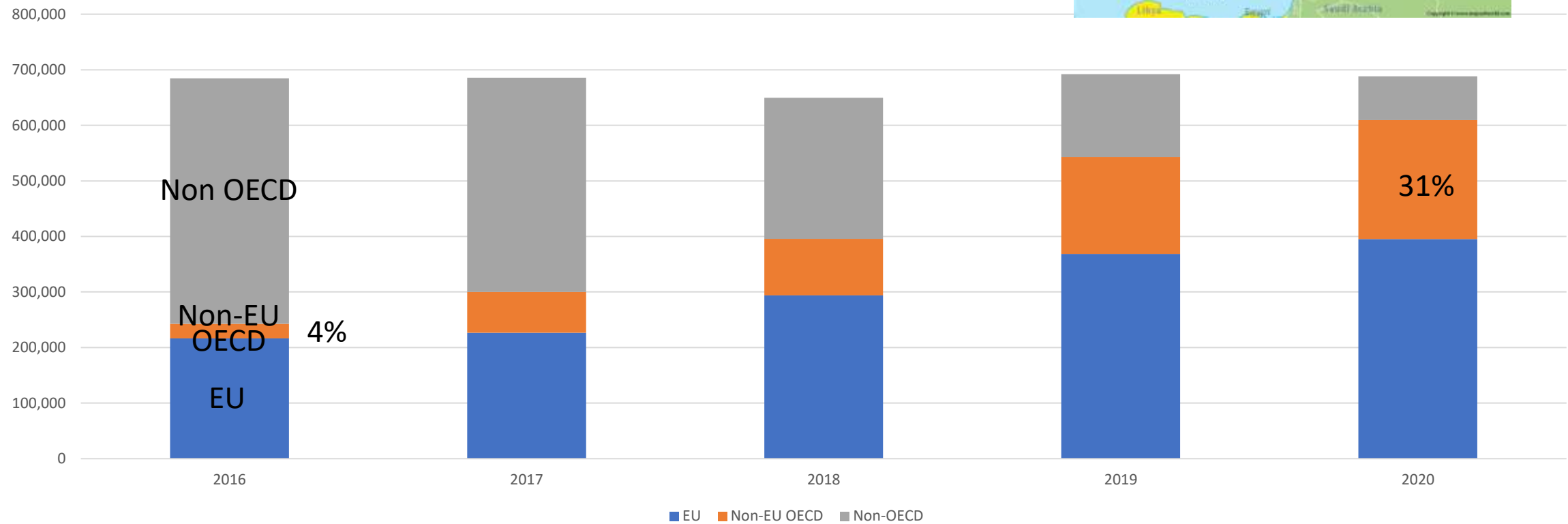
- Last minute (31 Dec) application of notification from 1 Jan
- Requires amendment to EU transposed legislation to include non-OECD as green list (June)
- Manifesto commitment to ban plastic waste to non-OECD – consultation on exports later in year
- Not big tonnage but some materials difficult to recycle elsewhere



Non-EU OECD

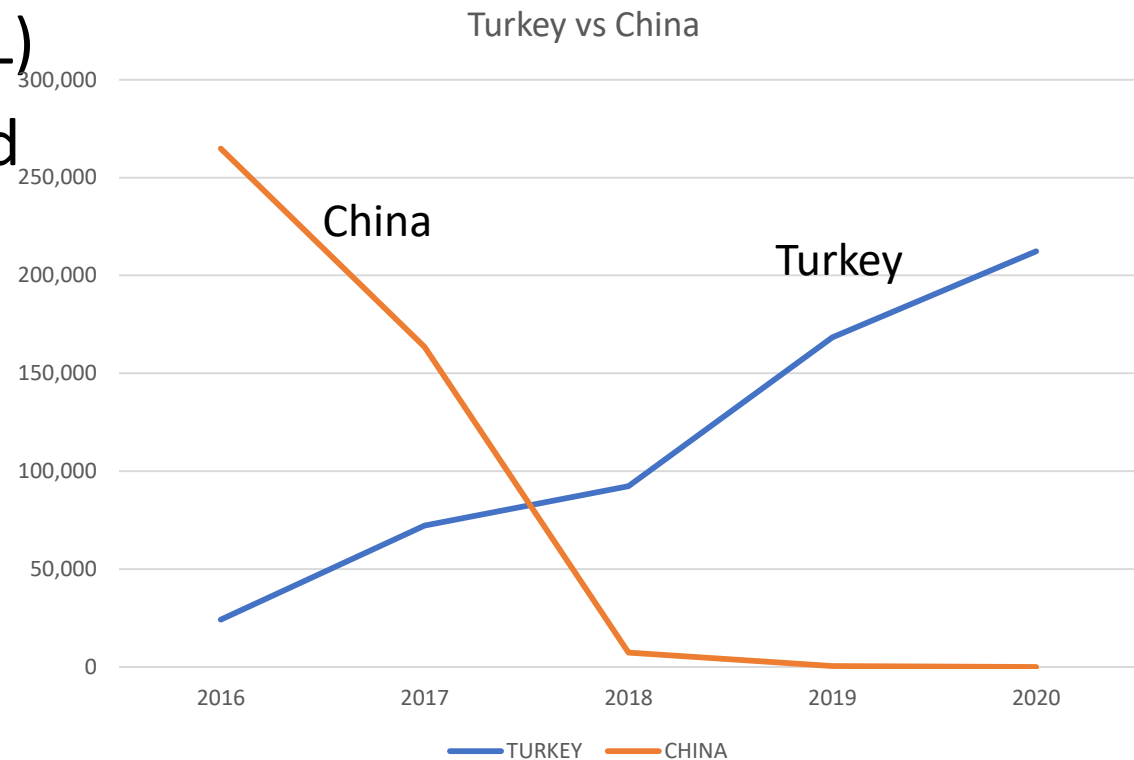


Plastic packaging waste export destinations



Turkey

- Turkey now biggest export market by far (30.9% compared to 16% NL)
- New rules for reprocessors applied in Sep 2020
 - Import license
 - 50% import quote
- New import rules from 1 January
 - Prohibit plastic produced from 'mechanical treatment' (EWC 19 12 04)
 - Prohibit mixed plastic



Basel convention changes

- From 1 Jan, Basel convention changed green list coding and permitted plastic types – B3011 and Y48
- PVC and mixed plastics beyond PE/PET/PP to be notified
- Exports to be ‘almost free from contamination’ and ‘almost exclusively’ single polymer of allowed mix
- UK Agencies apply ‘de minimus’ position
- EU developing Correspondents Guidelines no 12 with likely % contamination allowance
- EU allow intra-EU movement of PVC and broader mix under green list

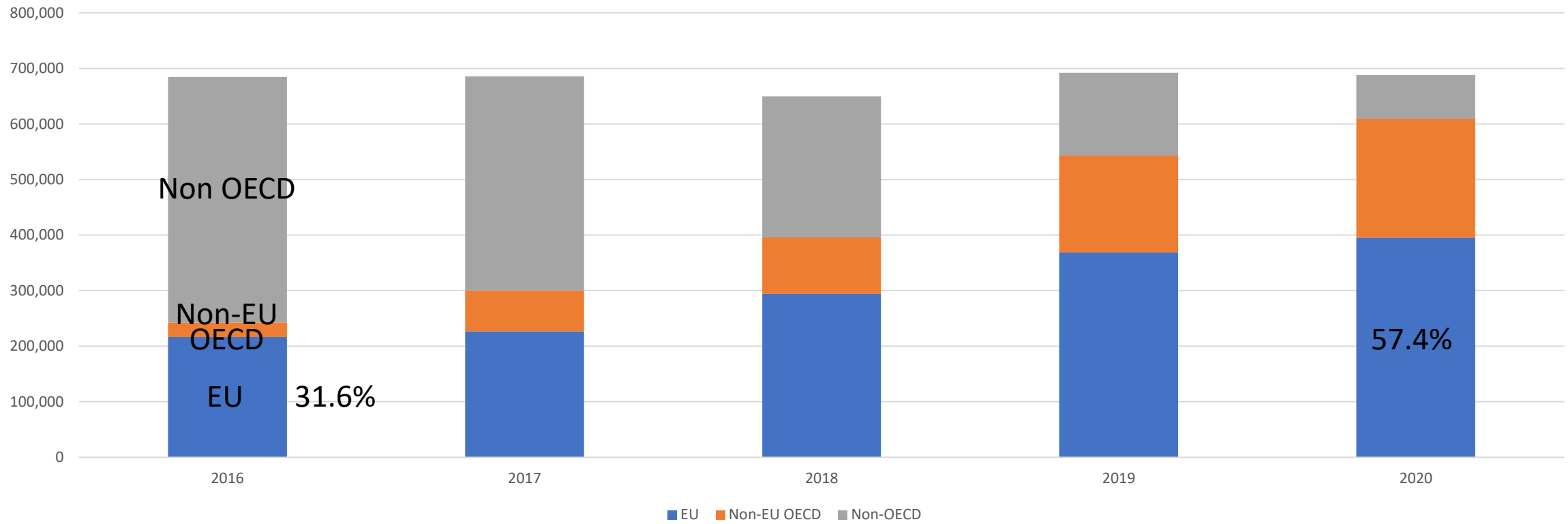
360 Environmental Ltd Summary of Plastic waste export controls from 1 January 2021

	GB - EU	GB - OECD	GB – Non-EU& Non-OECD	GB - NI	NI - GB	EU – EU (incl NI)	EU (incl NI) - OECD	EU (incl NI) – Non-OECD
B3011 (non-haz)	Annex VII	Annex VII	PIC	Annex VII	WTN	N/A	Annex VII	PIC
Y48 (non-haz)	PIC	PIC	PIC	PIC	WTN	N/A	PIC	Prohibited
AC300 (OECD haz)	PIC	PIC	Prohibited	PIC	Cons Note	PIC	PIC	Prohibited
EU3011 (non-haz)	N/A	N/A	N/A	N/A	N/A	Annex VII	N/A	N/A
EU48 (non haz)	N/A	N/A	N/A	N/A	N/A	PIC	N/A	N/A
A3210 (Basel haz)	Replaced by OECD A300 within GB and the EU							
PVC	PIC	PIC	PIC	PIC	WTN	Annex VII EU3011*	PIC Y48	PIC Y48

PIC – Prior Informed Consent ie Notification. Annex VII – green list. WTN – Waste Transfer Note. Cons Note – Hazardous waste consignment note.

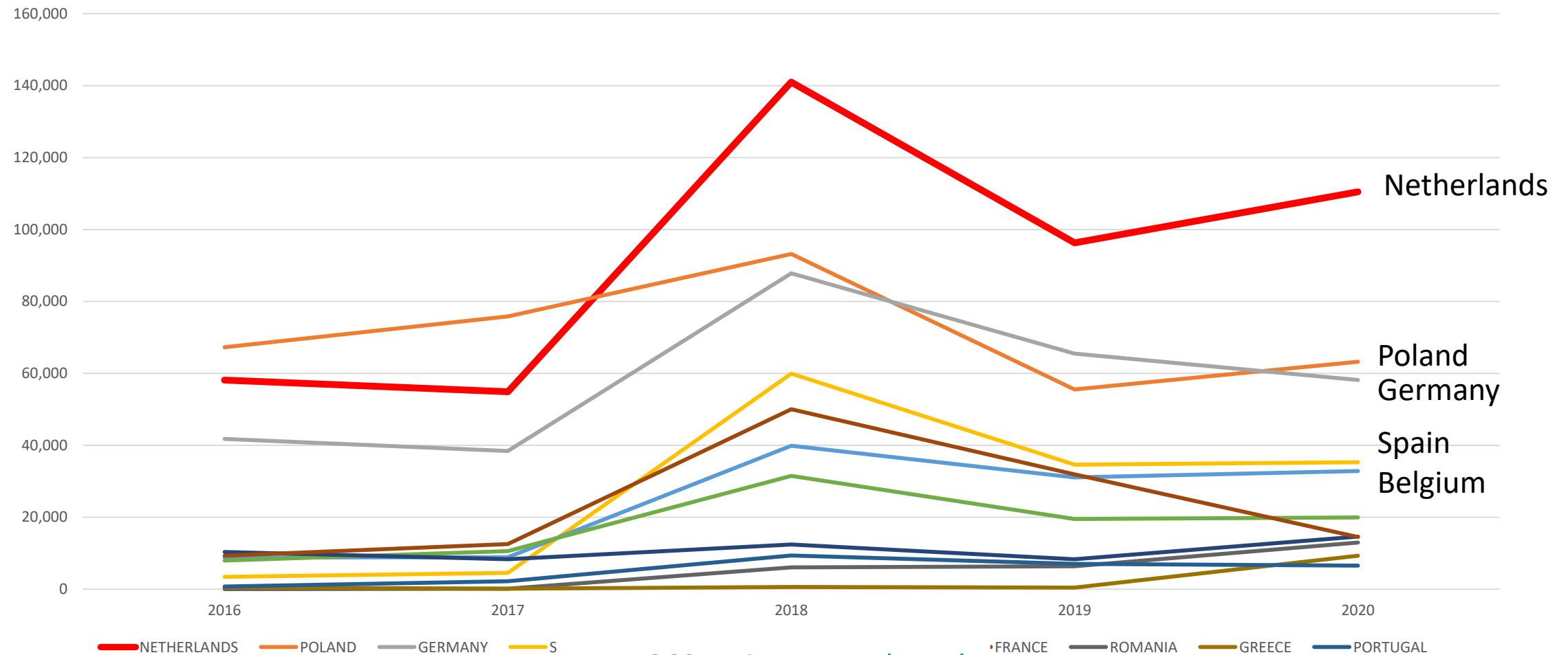
EU

Plastic packaging waste export destinations



EU destinations for plastic packaging waste

Top EU destinations



Northern Ireland Protocol



- Comes into force mid-March
- Treated as EU Member State for receipt of waste' purposes
- Therefore benefits from different EU applications of Basel
- Waste to NI from GB must be green list or notifiable
- Waste from NI to GB under normal GB duty of care

Other EU-related issues

- UK no longer party to EC waste related developments eg CG12
- 'Country of origin' issues with reuse into some MS
- Notifications becoming more difficult eg Spain now central rather than region
- Potential for increased legislative variation between parts of UK
- Opportunities to review historical EU controls eg EWC codes

Future infrastructure requirements

- DRS + EPR targets will see demand for increased plastic packaging recycling
- UK national targets will see increasing demand for separate nation capacity
- Tighter export controls will increase need for UK infrastructure
 - Improved processing prior to export
 - Increased UK reprocessing capacity
- Recycled content tax helping to drive demand for recyclate but price of virgin still main driver
- Investment required now to meet future demands but without policy intervention, will market deliver necessary investment?
- Heavily dependent on EPR for funding but that is unlikely to be available until 2024

THANK YOU

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