



Fédération Européenne des Activités du Déchet et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

FEAD POSITION ON THE REVIEW OF THE WASTE INCINERATION DIRECTIVE *April 2007*

Introduction

FEAD welcomes the invitation to be consulted on the review process and to participate in the workshops organized by Ökopol. FEAD is however surprised that the scope of the project, as reflected in the many questionnaires, seems much wider than the obligations stipulated in Article 14 and 16 of the WID.

Timing

FEAD is strongly opposed to a revision of the Waste Incineration Directive at this early stage; this is especially the case if the Commission in any way plans to merge the WID with, or into a revised IPPC Directive.

There is no real need to revise the WID. The present text is satisfactory and no major problems have been encountered. The only difficulties met relate to minor technical/monitoring aspects, which to a large extent have been solved by guidance at national level. These technical aspects did not induce level playing-field discrepancies between installations located in the different Member States.

Process specific considerations

FEAD is not in a position to comment on the need to add annexes for specific sectors. FEAD is however highly concerned about the confusion between BATAELs and ELVs, which have been observed in the permitting procedure for some installations. ELVs are by definition higher than BATAELs. Therefore FEAD calls for the maintenance of the clear distinction between BATAELs and ELVs. This confusion is in contradiction with the IPPC principle.

Based on the IPPC principle, it is recognized that there would neither be global environmental nor health benefits from reducing the ELVs further. Therefore FEAD supports the maintenance of the existing ELVs.

Monitoring

FEAD has listed the main aspects and its points of view below with respect to monitoring:

- **Monitoring ELVs during commissioning period:**
National guidance is considered satisfactory.
- **PCDD/F continuous sampling and Hg continuous measurement:**
The techniques up to now are not reliable.
- **2.5 hours discrepancy discards the daily average and max 10 times a year:**

APOH, Slovakia
ARS, Romania
ASELIP, Spain
AVFALL NORGE, Norway
AVFALL SVERIGE, Sweden

BDE, Germany
CAOH, Czech Republic
ESA, UK
FEBEM-FEGE, Belgium
FISE, Italy

FLEA, Luxembourg
FNADE, France
IWMA, Ireland
JLY, Finland

KSZGYSZ, Hungary
PASEPPE, Greece
PIGO, Poland
VA, Netherlands
VÖEB, Austria

This aspect requires some flexibility, which could be provided by national guidance. It should however not be a part of the revision process and does not justify the review.

- **EN 14181 standard:**
The problems of application have to be solved in the standard and not in the WID. Further guidance is under preparation at CEN level.
- **Definition of start-up and shut down periods:**
National guidance copes well with that question.
- **TOC:**
No problems encountered.
- **NOx:**
No problems encountered.
- **CO:**
No problems encountered.
- **PAH:**
FEAD is satisfied with the provision in the WID (Article 7.5)

Scope

Defining the borderline between co-incineration and co-processing is a complex exercise and should be addressed only on a case by case basis where required. FEAD does hence not consider the WID to be the relevant piece of legislation distinguishing between material recovery and other treatment of waste.

The proposed criteria - such as calorific value, organic or mineral content, energy contribution to the process, main purpose of the plant ... - are not appropriate criteria as the proposal is based on the quality of the waste whereas it should in fact be process related.

For instance, spent activated carbon can be processed as raw material and not co-incinerated as fuel or additional fuel in regeneration unit even if the waste has a high organic content, a high calorific value and no mineral content. This aspect should be addressed in the scope of broader legislation such as the WFD.

FEAD considers that plants managing SRF/RDF should always be subject to the WID requirements.

FEAD is the European Federation which represents the European waste management industry. Our members are national waste management associations, which have an approximate 60% share in the household waste market and handle more than 90% of industrial and commercial waste in Europe, with a collective annual turnover of € 50 billion.

We have 19 members from 18 EU Member States and Norway. FEAD represents companies with activities in all forms of waste management. These companies employ over 300 000 people who operate around 3 000 controlled landfills, 1 350 recycling and sorting centres, 1 000 composting sites and 350 incinerators and play an important role in the determination of the best environmental option for waste management problems.
