

## Waste management services in the context of the coronavirus

Brussels, 24 March 2020

The proposed draft communication on “Waste management in the context of the COVID19 outbreak: exchange of information, sharing of good practices and guidance on the application of EU waste legislation” rightly mentions that waste management services are an **“essential public service”** in each Member State. Waste management installations have to be qualified as **“critical ones”**. We need to have priority access to fuel and other supplies necessary for the continued operation of our facilities, as well as having exemptions from movement restrictions for our critical workers, or derogations for working hours and times to ensure continued service with reduced staff.

All sanitary measures, all priority measures, such as benefitting from protective equipment and materials, must be taken by **national and local authorities**, so that our sector can adapt the collecting, transporting, disposing of hospital and healthcare waste, of household/municipal waste, as well as industrial and commercial waste, in a continuous and safe way.

Some remarks on the guidance provided in the draft recommendation:

**The key challenge is to ensure the protection of workers continuing to collect, transport, and treat waste.** As the situation evolves very quickly, the correct level for intervention is at national level. It is likely that several recommendations in the draft, already implemented in a number of MS, will need to be adapted.

The recommendation that 'separate collection should continue' **should take into account every national and local situation**. In several Member States, up to half or more of the sorting centres have already been closed, particularly those managed by the public authorities, which disorganises the whole chain. In other MS, such as Germany, the Netherlands, Finland, Sweden and Belgium where no ‘lock down’ has taken place so far, separate collection and recycling activities are still continuing in order not to disrupt the supply chain, especially with regard to industrial demand. For these two different groups of Member States, the EU's views on whether or not to promote recycling must be according to each MS' situation while upkeeping the waste hierarchy.

APOH, Slovakia

BDE, Germany

ESA, UK

FLEA, Luxembourg

HRABRI ČISTAC,  
Serbia

NORSK INDUSTRI,  
Norway

SRI,  
Sweden  
VOEB,  
Austria  
YTP,  
Finland

ARMD, Romania

CAOBH, Czech  
Republic

ECEIA, Estonia

FNADE, France

IWMA, Ireland

PASEPPE, Greece

ASEGRE, Spain

DWMA, Netherlands

FISE, Italy

go4circle, Belgium

LASUA, Latvia

PIGO, Poland

## 1. Waste collection and treatment

### Municipal waste

- Citizens should be **required** (and not only be encouraged) to participate in safe waste collection, by taking the proposed measures in preparing their waste for collection. Asking citizens to put a date on their bags is unrealistic.
- The recommended continuation of recycling activities, should be **as far as possible** if the economic activity in the country allows it. And as long as sorting centers are still open.
- Imposing further logistical constraints to waste management installations, notably in sorting centers, will put further logistical constraints on them at difficult times. **Temporary storage capacities should be recommended, if needed, in countries where recycling activities go on.**
- Further considerations on sufficient storage capacity, not only with regard to continued recycling, but also for when the industry restarts: the COVID-19 pandemic is causing across Europe, the closure of different production facilities, e.g. the steel industry in Italy, and others that use materials originated from waste treatment. With a sharp decline in demand, and also the closure of some waste treatment plants (e.g. lithium battery treatments plants), and with the consequent increase of materials/waste storage by the plants. This could mean that in a very short time, permitted storage allowances could be reached, with consequent strategic plant closures. For this reason, competent authorities should be able to **grant derogations allowing an increase of storage capacity beyond what is normally allowed** by European or national rules, therefore mitigate any negative effects on the collection and treatment of waste.
- In fully automated sorting centers, there are no risks. **In other sorting centers, risk evaluation should be recommended.**
- Waste from Covid-19 positive people or people in quarantine: no manual treatment **nor MBT**.
- Protective gear, masks, gloves: currently impossible to get any kind of masks, due to shortage, in most MS. Type 1 masks are not the right measure, whereas type SFP2 masks offer full protection. But the practical details and alternatives for protective gear are under MS competence. EU should be careful about requirements that cannot be implemented, and would result in preventing waste collection.

### Health care waste facilities

- Health care sector to be asked to properly close waste containers. And to use single use containers, as this is still not today common practice. Health care waste collection and treatment operators have to be prioritised for the distribution of protective equipments.
- Our first main conclusion is that, even in these difficult times we should not neglect the waste hierarchy that puts recycling on a higher level, when still feasible. Having said that, waste-to-energy/incineration solutions will play a more important role in most, if not all, Member States. Given the reduction of industrial and commercial waste, as industrial production has almost come to a standstill in Italy and has fallen significantly in most MS, incinerated tonnages will decrease significantly compared to normal times. As there is no absolute certainty, to date, about the Covid-19 behaviour under anaerobic conditions, incineration must be preferred to landfilling for residual household waste.

## **2. Need for keeping continuous local and intra EU waste shipments**

In order to avoid bottlenecks/unwanted storage that would result in the closure of facilities, a continuous waste shipment activity has to be ensured despite shortages in transport capacity, lack of drivers, logistical difficulties, and the need to protect operators working along the shipment chain.

Public authorities have to be authorised to take all needed measures allowing adaptation of the waste shipment rules, guaranteeing safety and traceability.

### Non-hazardous waste

- Waste shipment documents should be allowed not to be physically signed by the “person who arranges the shipment”, in all MS, by derogation to the Annex VII and IB of the Waste Shipment Regulation. There are some risks of contamination on the paper documents. Electronic procedures have to be introduced, as Ireland just did.
- The same possibility should be applied for intra-national shipments.
- Derogations to some rules related to driving licences and transport authorisations, as already taken in Austria, under the control of public authorities.

### Hazardous waste

- Several MS: Germany, France, Luxemburg, Ireland, The Netherlands, Austria, Norway, Switzerland, Czech Republic, United Kingdom, Finland, Spain, Belgium (to date) already agreed to adapt the ADR, the agreement on road transport of hazardous goods which also covers transport of hazardous waste Multilateral Decision M 324, on art. 1.5.1) in order to authorise the extension of validity of certificates for shipments.