



INTERNATIONAL GREEN DEAL BRINGS MUTUAL  
UNDERSTANDING AND COORDINATION

# North Sea Roundabout is paying off



The North Sea Resources Roundabout (NSRR) has been in place for over two years now. The challenge facing the four participating countries on the North Sea is the facilitation of cross-border waste transport. They have already seen some early success. For example, two Dutch companies got the coveted end-of-waste status for their compost and PVC powder. “We know how to find each other better, and we understand each other better,” according to NSRR project leader Robine van Dooren.



The five cases in the NSRR focus on struvite, PVC, electronic waste, compost and bottom ash

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ROBINE VAN DOOREN  
(NETHERLANDS  
ENTERPRISE AGENCY)

Since 2016, the members of the North Sea Resources Roundabout (NSRR) Green Deal have been working on ways to remove barriers to cross-border waste transport between four North Sea countries. The aim of the NSRR is to make better use of secondary materials in the economies of the Netherlands, Flanders, England and France. Taking advantage of the North Sea countries’ markets can give the circular economy a nudge in the right direction. Cooperation increases scale and volume too, which makes it easier to realise the business cases. The NSRR is the first international Green Deal.

### Old regulations

The circular economy needs to close cross-border value chains. “The problem is that the new EU circular economy has to operate under old, linear regulations,” says *Robine van Dooren*, a project leader for the Netherlands Enterprise Agency (NEA). She was commissioned to lead up the project by the Ministry of Economic Affairs and Climate Policy and the Ministry of Infrastructure and Water Management. “The current legislation comes from the days when waste was simply waste, not something you’d ‘dump’ over the border. Nowadays we see waste as an economically valuable renewable resource.”

### Different interpretations

An additional challenge is the fact that Member States have almost always interpreted or implemented EU waste regulations, like the Waste Shipment Regulation, in completely different ways. Robine van Dooren says that

one plus point of the Green Deal is that the countries involved have now established a good dialogue together: “We know where to find each other better now, and we understand each other better.”

### Five cases

The NSRR has five cases in which two companies, national inspectors and policy experts are seeking solutions for how to keep reusing secondary resources. The five cases focus on struvite, PVC, electronic waste, compost and bottom ash (see boxes). Dutch companies are involved in each case. Van Dooren notes that “The sales market in the Netherlands is relatively small so it basically depends on international markets. We did not design the cases; the companies devised them.”

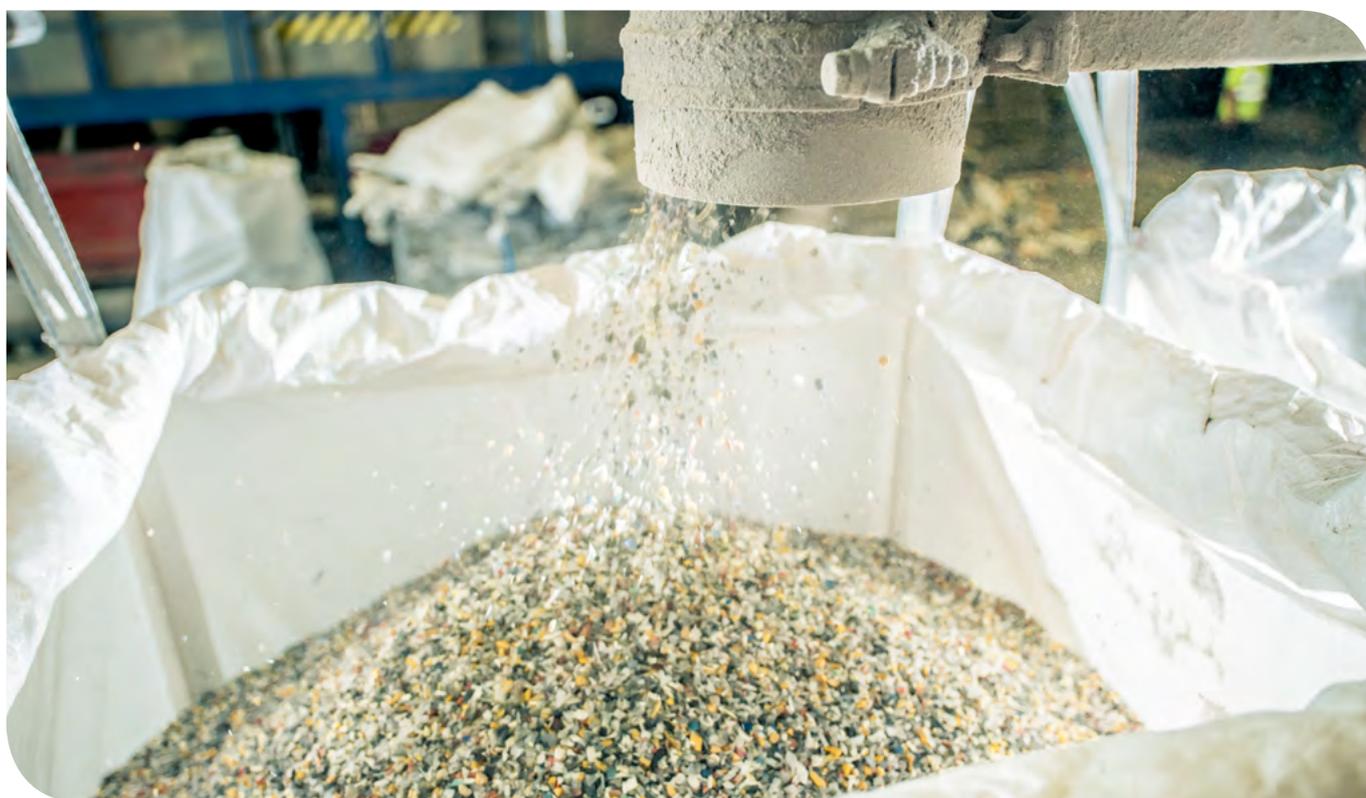
### Five lessons for WSR evaluation

- Allow electronic permit applications instead of paper ones;
- Restrict decision-making in cases of cross-border transport to the countries of origin and destination (instead of also including *transit* countries);
- Allow for exceptions in choosing an alternative to pre-approved transport routes;
- Permit the shipment of samples over 25 kilograms for testing in receiving country;
- Expedite the procedure (7-day fast track) for parties whose installations have “pre-approved” status under Article 14 of the WSR.

### End-of-waste status

In each case, “end-of-waste status” features as a central theme. The end-of-waste criteria indicate the point at which a particular stream

constitutes either waste or – following treatment – a product. Product status stimulates recycling and simplifies export. The Member States have different perspectives





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TON VAN DER GIESSEN  
(VAN WERVEN)

on and criteria for end-of-waste status. "If the rules allow it," says Van Dooren, "the NSSR hopes to achieve better harmony and alignment between the criteria."

### Compost is a product

The NSSR has already achieved concrete success. In autumn 2017, Twence, one of the two companies in the compost case, received end-of-waste status from the former Ministry of Infrastructure and the Environment for its compost. This was an important step in closing the international nutrient cycle. In the NSRR case, Twence wants to export the resource to the United Kingdom. Van Dooren explains that they'll

"have to wait until the UK is ready. Commitment at the ministerial level is in, but then there's Brexit, which puts other priorities first."

### Marathon

Van Werven also got end-of-waste status from the Dutch authorities in 2018. The company may now label its PVC powder, which is used in three-layer sewage pipes, as end-of-waste. As in the compost case, it's now a question of waiting for the same status to be given in the UK and Belgium. Van Werven's director *Ton van der Giessen* is optimistic. "What's special about the Green Deal is that as a company, you could never manage this alone."

The **Green Deal** has  
**five cases** in which  
**two companies,**  
**inspectorates** and  
**policy experts** are  
all seeking **solutions.**



## Compost

**(NL-UK) Waste processor Twence and Comgood.** Agricultural areas in the north-east UK need organic fertilisers and nutrients. Twence compost received end-of-waste status in September 2017; the UK will have to follow suit. A comparison was carried out of the Dutch label Keurcompost and the British label Compost Quality Control. Exporting Dutch compost helps to close the mineral cycle and maintain soil quality.

## Struvite

**(NL-FR) SUEZ, Véolia, Aquaminerals and Waternet.** The Netherlands is able to successfully extract the phosphate-rich mineral struvite from waste water. Struvite is a slow-release fertiliser that can substitute chemical fertiliser. France is working on “homogenising” struvite with fertiliser status. Their work on this is quite advanced. In the Netherlands, the National Institute for Public Health and the Environment and water companies are conducting analyses of the precise types of medical residues and pathogens contained in materials, and whether struvite can be granted end-of-waste status.

## Electronics waste

**(NL-AT) Muller Guttenbrunn Gruppe and HKS Metals.** The Austrian firm Muller Guttenbrunn Gruppe (MGG) and the Dutch HKS Metals derive shredder residue from electronics waste. HKS Metals supplies this shredder waste to MGG, which has a large factory (40 thousand tonnes) in Austria where it extracts diverse non-ferrous metals – such as aluminium, copper and precious metals – with the aim of reintroducing

them to market. The synthetic materials are 95% recycled and stripped of flame retardants. So-called fast tracks are available for companies in possession of “pre-approved” status under the WSR. Muller-Guttenbrunn has such status.

## Bottom ash

**(NL-UK) Inashco and Ballast Phoenix.** The Dutch office of Inashco is working with the UK’s Ballast Phoenix on taking partially processed bottom ash from the UK to the Netherlands for further removal of non-ferrous metals and metals. The sanitised minerals can then be used as construction material in the civil and hydraulic engineering sector. Bottom ash remains waste and notification (application and starting the procedure) is mandatory. In this case, the parties are seeking to expedite and simplify the procedure. The case is unlikely to be resolved this year because it affects the existing regulations.

## PVC

**(NL-BE-UK) Van Werven, Renewi and Wavin.** The Dutch firm Van Werven processes PVC waste collected by Renewi in Flanders into granulate that multinational pipe supplier Wavin uses to make indoor pipes in the UK. With a life-cycle of fifty to seventy years, PVC releases a significant amount of waste material that still contains lead and cadmium. The Netherlands has already assigned end-of-waste status to PVC, but Belgium and the UK still need to do so. Discussions are also taking place about the consequences of a potential “hazardous waste” label for PVC waste.

# Member States almost always have **different interpretations** or **implementation** methods for **EU waste regulations** like the Waste Shipment Regulation.



We hope that the re-evaluation of the WSR in 2020 will bolster digitalisation.



KEES HOPPENER  
(DUTCH HUMAN  
ENVIRONMENT  
AND TRANSPORT  
INSPECTORATE)

You need the authorities on your side, and that seems to be happening now,” says Van der Giessen. He believes the Green Deal is an important step, but says we still have a long way to go. “You have to start the marathon some time though, if you ever want to reach the finish and break into new markets.”

## Hazardous waste label

Van Werven reuses old PVC. “The environmental advantages of using recycled hard plastics are clear,” Van der Giessen says: “grinding secondary PVC saves oil and it also saves energy in the production process.” Unfortunately, changes to EU waste legislation in 2015

lowered the maximum amount of lead permitted from 1% to 0.1%. “They did that with the best of intentions, but it does mean we now risk being labelled “hazardous waste,” even though it poses no threat to public health. In new pipes, secondary PVC gets sandwiched between virgin PVC.” The “hazardous waste” label represents a threat to the market.

## Barriers

The electronics waste case is starting to make headway. “We build a modern factory in Austria to extract usable resources from shredder residue,” explains *Chris Slijkhuis* of Muller Guttenbrunn





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WALTER KLOMP  
(DUTCH HUMAN  
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Gruppe (MGG). Slijkhuis wants to bring waste from other countries to his Austrian factory. The process could be made a lot faster and simpler than it currently is. “Every year the European Union produces 1.2 million tonnes of electronics waste, but there is only capacity for 300 thousand tonnes. So that gives you some idea of how much is being shipped to China.” Slijkhuis regrets that so many valuable resources are leaving Europe because of insufficient trust between governments and lengthy procedures. “We want to make resources from electronics

waste available for use in Europe. But one question follows the other,” he says, “and every time we end up a month further down the line.”

### Fast tracks

Hopefully some relief can be had in so-called fast tracks. Van Dooren explains: “We want to try to speed up the administrative procedure for transport with the fast tracks, preferably getting it down to 7 days or less. Fast tracks should be possible for companies whose facilities have ‘pre-approved’ status. Muller-Guttenbrunn has that.

The Waste Shipment Regulation provides the option for a less extensive and faster export permit, but in practice we are seeing European countries apply different criteria. We need to try to align them.”

### Points for improvement

At present, the Waste Shipment Regulation is being evaluated. A re-evaluation of the WSR is planned for 2020. The NSRR cases can provide some valuable lessons for that assessment. Van Dooren names five (see box). One of these is digitalisation. “The cases demonstrate that digitalisation could really make a difference in the procedures. We’re still using fax machines to send information back and forth. The companies are also required to keep providing bank guarantees. They are not allowed

to ship samples over 25 kgs to test the installations and monitor the product,” according to Van Dooren. This lesson and other points for improvement will be submitted for the Waste Shipment Regulation evaluation.

### Risk-based operation

Getting the most out of each other’s markets has advantages for players beyond the circular economy and companies in the waste sector. “The Inspectorate benefits too,” says Van Dooren. “The Green Deal can also help streams we are not worried about to operate more smoothly. That way, the Inspectorate has its hands free to deal with the truly worrisome waste shipments.”

At the Human Environment and Transport Inspectorate (ILT), *Kees*

*Hoppener*, head of the department that issues permits for waste products, industry and trade, affirms that the policy ILT has formulated in ‘Koers ILT 2021’ (ILT Course 2021) has set in motion a change in line with the NSRR. One important cornerstone is risk-based operation. Hoppener says, “Waste streams that have the same composition and processing year after year fall under what we call recurring applications. These are subject to a lower degree of supervision. That way, we can pay more attention to more hazardous waste streams. It helps us distinguish the ‘good’ players from the ‘bad’ so we can focus on the latter.”

### Universal approach

It seems that this approach cannot be applied to all waste streams

Both **compost**  
and **PVC recyclate**  
recently received  
**end-of-waste status**  
in **the Netherlands.**



# If the **rules allow** it, the **Green Deal** hopes to achieve better **harmony**.

though. Hoppener says the problem lies in the fact that the composition and processing procedures of bottom ash, for example, differ everywhere. So “recurring applications” are out of the question. The different Member States don’t always see things the same way,

which makes it much harder to generalise the positive experiences of the NSRR.

*Walter Klomp*, head of waste supervision at ILT, underscores that fact. “The working environment, processes and waste composition for compost, struvite and bottom ash are different in each country. It’s impossible to take a universal approach,” claims Klomp.

back and forth. We are hoping that the re-evaluation of the WSR in 2020 will bolster digitalisation,” Hoppener says. “We are delighted to be a part of the NSRR because most of the WSR regulations were developed in the 1990s in the wake of a several dumping scandals, which led to the introduction of tough legal instruments. Today, at least in Europe, we no longer need these instruments for everything.”

Hoppener has good things to say about the progress so far. He points to the fast tracks as an example. “The e-waste programme of Muller Guttenbrunn Gruppe/HKS Metals is making strides and a fast track should be feasible provided all the criteria are met.”



We want to make resources from electronics waste available for use in Europe.



CHRIS SLIJKHUIS  
(MULLER GUTTENBRUNN  
GRUPPE)

#### More information:

- [Green Deal to boost circular economy in the EU](#)
- [North Sea countries agree to close cross-border value chains](#)
- [Green Deal North Sea Resources Roundabout](#)
- [Video of first NSRR results](#)

