3rd April 2014

By e-mail to:
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Cc'd to:
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Dear Max,

Re: Mineral Products Association response to the consultation on Phasing out Waste Acceptance Derogations at Landfill Sites for Hazardous Waste

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 480 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production, 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors[1].

This response relates specifically to the impact of the consultation proposals on MPA Cement members.

MPA support the Government's 2010 hazardous waste strategy and the aim to move waste up the hierarchy. Co-processing in cement manufacture provides a holistic recycling opportunity in that the energy and the elemental content of the waste is recovered and recycled in the cement making process and the cement product. In 2012 the sector consumed 1.38 million tonnes of waste and by-products that may otherwise have gone to landfill. Furthermore, MPA Cement members recover cement kiln dust (CKD) and bypass dust (BPD) waste that is produced in the manufacture of cement. In 2012 100% of CKD and BPD was recovered for recycling in the process and other external uses. As a result, the cement sector is a net waste consumer and the majority of our member's cement manufacturing sites are permitted to accept hazardous waste as fuel and raw materials.

The consequences of the proposals in the consultation document affect MPA Cement members because they limit the outlets for cement production process waste, particularly BPD (EWC code: 10 13 12*). BPD is produced to control the circulation of volatile elements, primarily alkalis and chlorides in the kiln system. Alkalis and chlorides need to be removed from the process for two reasons, the presence of them

[1] For more information visit: www.mineralproducts.org

in cement can have a detrimental effect on the performance of the finished concrete and their circulation within the kiln system leads to blockages. Chlorides are used to increase the evaporation of potassium and sodium in the kiln thus reducing the alkali content of clinker. This results in high levels of alkali chlorides in the BPD.

Currently, one of the key routes for bypass dust recovery is as a soil improver by land spreading. This beneficial use of BPD takes advantage of the high concentrations of potassium, phosphate and lime in BPD. The dosage for each deployment is based on analysis of soil requirements and is managed by specialist agricultural companies. MPA Cement members carefully balance the raw material and fuel inputs to cement manufacture to ensure the continued suitability of BPD for its beneficial use in land spreading applications.

However, whilst co-processing with mineral recycling holds a valuable place in the waste hierarchy, regulators, for example the EA, currently fail in their duty to protect the environment by introducing potential barriers that prevent the beneficial use of BPD. This is specifically highlighted in applications for end of waste and by-product status which are complex, long, drawn out and costly (the EA have proposed that they may start charging for this service). MPA believes that the current approach is counterintuitive to maximising material recycling.

MPA has repeatedly asked for a sector based initiative to 'streamline' the use of CKD and BPD on land. To date there has been no tangible progress. In 2013 the EA issued letters stating their view that all kiln dusts are waste, which had a serious impact on the use of fertilisers containing kiln dusts, whilst as a sector we are pushing for the initiatives that allow the use of BPD on land. If the land spreading route for recovery of BPD is removed, this would remove a key recovery outlet, potentially resulting in the only option to dispose of it to landfill.

MPA cement members have been granted permits to operate landfill sites on the basis of a 3x WAC for chloride derogation to allow the landfilling of BPD. At present these landfills are under utilised because there are beneficial recovery route such as land spreading. However, their strategic existence is vital to domestic cement manufacture because without them it would not be possible to produce cement of an acceptable quality for use in UK construction. Consequently MPA Cement members wish to retain the ability to use disposal by landfill in the event that recovery outlets become unavailable.

MPA therefore insist that that the EA do not remove the 3x WAC derogation and are open to consider others in future because more useful options have not been fully explored and implemented.

MPA hope you find these comments useful and should you require any further information then please do not hesitate to contact me.

Yours sincerely

Dr Diana Casey
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