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Chair of Lviv Regional State Administration

Mr. Andriy Sadovyi
Lviv mayor

29 May 2018

Ref: Mechanical biological treatment of waste in Ukraine

Dear Sir/Madam,

Over the last year, in Ukraine there have been active discussions and plans to construct complexes of mechanical biological treatment (MBT) of domestic waste. The specific feature of this technology is production of refuse-derived fuel (RDF) and compost.

In Ukraine, in particular, in Lviv there are plans to construct a mechanical biological complex for reloading and processing solid domestic waste with the possibility of arranging a zone for producing RDF fuel. On 12 April 2018, the notification about the planned construction of the waste processing complex was officially posted in the unified register of environmental impact assessment on the website of the Ministry of Environment and Natural Resources of Ukraine.

Such an approach to solving the problem of domestic waste has been found to be ineffective in other parts of Europe and is not supported by the European Commission.

Please find attached a briefing note in which we present our position regarding mechanical biological treatment that is based on the experience of the EU countries and EU legislation together with a number of recommendations for alternative ways of solving the waste problem in Lviv.

We hope that you will find this useful. If you have specific questions, please do not hesitate to come back to us – specifically, to my colleague Piotr Barczak, EEB Policy Officer on Waste, at wasteresource@eeb.org for technical questions.

Yours sincerely,

Jeremy Wates



Secretary General

European Environmental Bureau
Europe's largest network of
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EEB Briefing Note on mechanical and biological treatment of domestic waste in Ukraine

May 2018

1. In Europe, mechanical and biological treatment (MBT) is considered to be ineffective way of solving the problem with domestic waste. This is evidenced by the experience of European countries. Over the past 10 years, 161 MBT enterprises were constructed in Poland, which is the largest number in the world. However, they do not fulfill their main function, since the average amount of waste that goes to recycling as a result of MBT does not exceed 7%. MBT complex in Vilnius is considered to be one of the best among similar complexes of other countries, but it segregates only 6% of recyclable waste. MBT has received a negative assessment in European countries and cannot serve as an example for implementation in Ukraine.
2. Cement plants have little demand for RDF produced by MBT plants because of complications of the technological process. Cement plants in Poland have high requirements to RDF quality. They refuse to take fuel that contains polyvinyl chlorides. RDF from Vilnius MBT plant is landfilled because cement plants cannot accept it.
3. The only advantage of MBT is in stabilization of organic fraction of waste because it is the source of biogas emissions on landfills. Lviv project does not envisage separated collection of organic waste and hazardous waste. Thus, organic waste that will not be collected from people separately, will be polluted with heavy metals, pesticides, antibiotics, other hazardous substances. Technical compost will not be suitable for further use and will be landfilled.
4. The notification about the planned activities posted on the web-site of the Ministry of Environment and Natural Resources of Ukraine does not contain any information about cement plants that will accept RDF from Lviv waste processing complex. Therefore, having no guarantees from cement plants, it is unreasonable to plan production of RDF.
5. Production of RDF and polluted technical compost will not decrease the amount of waste that will be landfilled because products of mechanical biological treatment will have no further alternative use. Thus, more than 90% of waste will be landfilled on the landfill that currently does not exist in Lviv.
6. Mechanical biological treatment should be preceded by obligatory separated collection of organic fraction of waste and hazardous waste that will ensure maximum of reuse of separated waste and production of clean compost. In this case, compost will be suitable for further use, in particular for reclamation of closed landfills or for use in agriculture.

7. Having signed the Association Agreement, Ukraine undertook to implement requirements of Directive 2008/98/EC on waste. One of the requirements of Art. 22 of the Directive is separated collection of organic waste for its further composting. Production of clean compost is possible only under condition of separated collection of organic waste in Lviv.

8. According to Directive 2008/98/EC on waste, countries have to implement clear hierarchy of priorities in waste management from the most effective and most prioritized to the least prioritized ones:
 - Prevention;
 - Preparation for reuse;
 - Recycling;
 - Other types of utilization, for example, energy recovery;
 - Landfilling.

9. On 26 January 2017, the European Commission addressed the European Parliament with a notification about review of waste incineration activities in order to prioritize reuse and recycling of domestic waste. The document states that the European Commission supports the use of facilities for anaerobic digestion of biodegradable waste. Moreover, the document states that EU funding and other public financial support should be directed towards waste treatment options that are in line with the waste hierarchy and that priority is given to waste prevention, reuse, separate collection and recycling [1].

10. In October 2017, at the Envicon Environment Congress, George Kremlis, Head of Cohesion Policy and Environmental Impact Assessment Unit of DG Environment, stated that the European Union will not fund construction of new waste incineration and MBT facilities. Funds will be allocated only for their upgrade. Alongside with this, the European Commission supports separate collection and sorting of waste, decomposition of organic waste without access of oxygen (anaerobic digestion)[2].

11. EBRD will fund the project in Lviv. Therefore, EBRD as one of the signatories of the European principles of environmental protection undertook to foster implementation of environmental principles, practices and standards in projects funded by the bank. Within its authority, EBRD should try to ensure compliance with relevant principles and requirements of international law[3]. European countries found MBT projects to be ineffective both in economic and environmental terms. We propose that EBRD supports the best available technologies (BET) for implementation of the project in Lviv.

In view of the above, the experience of European countries, requirements of European legislation and Ukraine's obligations according to Annex 30 to the EU-Ukraine Association Agreement, we consider it unreasonable to implement the proposed MBT project in Lviv. Instead, we propose the following immediate steps in order to solve the waste problem in Lviv:

- Reclamation of the closed Lviv landfill;
 - Construction of a waste processing complex in Lviv that will include a waste separation line and composting station with anaerobic digestion;
 - Conducting information campaign;
 - Organization of separate collection of organic (food, green) waste;
 - Organization of separate collection of hazardous waste (local and mobile waste collection points).

[1] <http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

[2] <https://portalkomunalny.pl/nie-bedzie-dofinansowania-dla-spalarni-i-nowych-zakladow-mbp-wideo-365696/>

[3] <http://www.ebrd.com/downloads/research/policies/esp-ukrainian.pdf>