



Проект фінансується Європейським Союзом



Проект впроваджується Міжнародною благодійною організацією «Екологія – Право – Людина» у партнерстві з Громадською організацією «Екологічні ініціативи»

DIRECTIONS OF IMPROVEMENT OF THE WASTE MANAGEMENT SYSTEM IN UKRAINE

Зміст публікації є виключною відповідальністю
МБО «Екологія–Право–Людина» і жодним чином не може вважатися таким,
що відображає погляди Європейського Союзу.

The current Ukrainian state policy in the area of waste management is not sufficiently clear. The old non-transparent and corrupt post-Soviet system does not comply with modern European trends and needs to be fully updated.

Moreover, the system is not able to function due to lack of control on behalf of the state that should prevent violations. However, the control is not effective now because either moratorium on inspections is imposed or the purpose of inspections is just to impose fines. Therefore, for the proper functioning of control and elimination of corruption risks, it is also important to introduce supervision of those who carry out inspections.

On 08.11.2017, the Cabinet of Ministers of Ukraine approved the National Strategy for Waste Management in Ukraine until 2030. EPL participated in drafting the Strategy, which reflected the best European experience. However, not all provisions of the Strategy are adapted to Ukrainian conditions and can be implemented without harming the environment. For example, it is necessary to prevent the implementation of the provisions of the Strategy that were lobbied by business and envisage construction of 20 stationary facilities for thermal waste utilization (which in fact are waste incineration facilities). This is due to the fact that waste incineration is a source of emissions of toxic substances (dioxins, furans) that are neither monitored nor controlled in Ukraine, and given that the proper equipment for waste incineration and emission purification is expensive and hardly affordable for Ukraine investment. Also, in October 2017 at the congress of Envicon Environment, the head of the Directorate General for Environment of the European Commission, George Kremlis, said that the European Union would not finance the construction of new waste incineration plants and plants using MBT (mechanical biological treatment) technology (1). Thus, the European Union has clearly made it clear that it does not support waste incineration. Given this, it cannot be considered as a possible option of waste management in Ukraine.

It is also vital to prevent construction of waste treatment facilities that apply mechanical biological treatment (MBT) technology. In Europe this technology is recognized to be ineffective for solving waste problem evidenced by experience of European countries. Over the last 10 years Poland constructed 161 MBT plants, which is the highest number in the world. But they do not perform their function because for this technology the percentage of waste that then goes for recycling does not exceed 7 %. RDF (refuse derived fuel) produced by MBT plants has little demand from cement plants because its use substantially complicates technological process of cement plants and requires additional investment. MBT is not supported by European countries and cannot be applied in Ukraine.

(1) <https://portalkomunalny.pl/nie-bedzie-dofinansowania-dla-spalarni-i-nowych-zakladow-mbp-wideo-365696/>

The National Waste Management Plan reflecting all the requirements of the EU Directives is to be developed and approved for implementation of the National Waste Management Strategy. The Plan is to contain clear schedule of implementation of certain activities, enlist executors in charge and also envisage the monitoring of its implementation. Regional (oblast) waste management plans are to be developed based on the National Waste Management Plan.

A number of laws are to be adopted for implementation of the National Waste Management Strategy, first of all the Framework Law "On waste". It should embed the main approaches to waste management based on European principles (waste hierarchy, "polluter pays" principle, extended producer responsibility etc). Provisions of the framework law should regulate management of municipal and hazardous waste, contain requirements to domestic waste landfills and envisage strict responsibility for violation of rules of waste management. EPL sees its task in controlling the process of the framework law adoption in the Parliament to make sure that it does not get substantially transformed at the last stage of adoption.

After adoption of the framework law, special laws are to be adopted: on WEEE, on batteries and accumulators, on packaging and waste packaging. Importantly, a law on packaging and waste packaging is registered in the Parliament but EPL does not support it because it does not comply with requirements of the EU Directive on packaging and waste packaging.

It is necessary to develop and approve the unified national classifier of waste based on the EU classification for waste identification and control over it.

It is important to review the National Register of Pesticides and Chemicals used in Agriculture that are permitted in Ukraine with the aim to exclude from the register those that are banned in the European Union. It is vital to adopt regulation on ensuring strict control over production, transportation and use of pesticides.

It should be particularly stressed that any sector of environmental protection is not going to work unless there is established the system of legal responsibility for violations as well as the system of transparent and democratic control, supervision and monitoring.