



Eurits position paper – permits and permitting

Eurits believes that all facilities treating waste should be subject to the same type of permits. In particular, for hazardous waste treatment facilities there should be no exemption from permitting regardless of the operation classification (recovery or disposal). If exemptions from permitting are allowed for hazardous waste treatment facilities, that would lead to lower environmental standards and a reduction in control of hazardous waste. The hazards and risks are the same whether the waste goes to a recovery facility or a disposal facility. It is crucial that all facilities are licensed in a harmonised way to the same high environmental standards.

Permits are a guarantee for a transparent and level playing field; having no permits means no transparency and creates the possibility of low-quality solutions being adopted. The acquisition of a permit is not a problem in the timing of a project or financing of an investment when the procedure is adapted to the environmental risks of a waste treatment solution. Europe needs guidelines for efficient permitting more than exemptions.

Eurits supports the idea that there could be different levels of permits for different types of operation, provided those levels are based on the types of waste being handled and reflects the level of risk involved with each operation.

Eurits believes that permits should be integrated to cover the various pieces of legislation applicable for each installation eg covering the Waste Framework Directive, Waste Incineration Directive and the IPPC Directive.

If a facility changes the type of waste that it handles, or if a non-waste facility starts to handle waste, then the permit should be revised to reflect the new level of risk.

Copies of permits should be made freely available to the public.

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