

Annual Report 2005

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The waste sector provides employment for 30,000 people

Turnover in the sector amounts to 5.5 billion euros per year

In 2004 the 7 million households in the Netherlands produced more than 9 million tonnes of waste

Waste arisings in the Netherlands in 2003 totalled over 61 million tonnes

Waste sector seizes the opportunity!

During the past year it became clear that the German landfill ban was a good step on the way to a European level playing field. The government's decision to open the borders for the transport of household waste and similar commercial waste on 1 January 2007 opens up further opportunities for the waste sector. It will generate considerable activity on the waste market and provide a substantial impetus for investment. The time is ripe to invest. It is not surprising, therefore, that plans for new incineration capacity are stacking up. Over the next few years we expect to build much additional capacity and I am sure that the waste market will find a new equilibrium. The volume of surplus combustible waste now being landfilled under discretionary permits will shrink rapidly and Dutch recycling companies and waste incinerators will process more waste, possibly including waste from neighbouring countries. We hope that the Dutch government will work with our neighbouring countries to reach agreement on a common system of landfill taxes and discretionary permits, because the past year has clearly demonstrated that providing reserve waste disposal capacity is an important function of the landfill sector. The waste market is not steady and can fluctuate at any time. The sector and the government have every interest in presenting a united front in Europe. Because harmonisation of the regulations and fair competition are essential for the development of a robust waste market, legislation and regulations must be geared to ensuring high quality waste management services. I have every confidence that market thinking in the sector will grow over time and that waste companies will translate the knowledge they have gained in recent years into new investment and more jobs. The Dutch waste management sector is an independent economic sector and takes responsibility for people and the environment – now *and* in future.

Jan Hendrik Klein Molekamp
Chair of the Dutch Waste Management Association

Mission:
The Dutch Waste Management Association works to create a healthy and balanced business climate in the Netherlands and Europe for its members, who are active in the waste management chain from collection to processing. The Association stands for efficient, practicable and sustainable waste management.

Playing field

A level playing field at national and international levels is an absolute requirement for fair competition. Important conditions for achieving this are harmonisation of legislation within Europe and equal application of the rules across the member states.

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Sustainability

Waste companies take their social responsibility towards present and future generations seriously. Sustainable waste management has social, ecological and economic dimensions.

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Self-regulation

We must deal with the 'free riders' who make wrongful use of the acquired rights of the sector and give it a bad image. The waste sector has its own responsibilities in this regard.

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Administrative costs

Clear regulations and enforcement are important ingredients for professional operation in the waste sector. Licensing must be as efficient as possible.

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Working conditions

Waste companies are working to raise awareness of safety issues to improve the culture of safety and encourage employees to question each other's working practices if the need arises.

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Association profile

The Dutch Waste Management Association represents the interests of Dutch waste companies at the national and international levels. Members are active in the waste management chain from collection to processing.

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A level playing field at national and international levels is an absolute requirement for fair competition. Important conditions for achieving this are harmonisation of legislation within Europe and equal application of the rules across the member states. Predictable and reliable government policy is also very important; nothing frustrates a level playing field more than regulations that change every year.

Borders remain closed to combustible waste for another year

For much of 2005 the waste sector was held in suspense about the opening of the borders to combustible waste. Would the state secretary for environment open the borders on 1 January 2006, or would the government not have the confidence? State Secretary Pieter van Geel kept the sector waiting a long time for the answer. On 5 October he announced that he would depart from stated policy. The government judged the situation to be too uncertain and said it was too early to open the borders. This decision was heavily influenced by the introduction on 1 June 2005 of the German landfill ban. At a stroke the waste market was thrown into turmoil. More waste had to stay in the Netherlands and arisings of household and commercial wastes were far in excess of existing processing capacity. Germany also had to contend with a shortfall in capacity. In contrast to the Netherlands, Germany does not recognise the need for reserve waste disposal capacity and discretionary permits for landfill during periods when processing capacity is insufficient. The state

secretary made the creation of a level playing field a condition for opening the borders and wanted to wait and see how Germany would react to its own shortage of waste processing capacity. He also wanted to examine whether there was a need for a supporting policy in the Netherlands, an absolute landfill ban for combustible waste being the likely candidate. The waste management sector was happy with the existing system of landfill taxes and landfill bans. It claimed the existing system was working well and that an absolute landfill ban would strain market flexibility and lead to higher costs. The summer of 2005 demonstrated that a safety valve is needed because the waste market is in constant flux. State Secretary Van Geel finally gave a guarantee that the borders would be opened on 1 January 2007, giving the sector a green light to invest in new processing capacity. When the borders open waste companies must be allowed to import waste as well, and the sector is urging the state secretary to make arrangements with Germany to allow this.



Regular consultations with the state secretary

During 2005 the Dutch Waste Management Association continued to have regular consultations with Pieter van Geel, the state secretary for environment. An important topic during these meetings was the need for a healthy investment climate for the Dutch waste management sector. Important elements that go to make up such a climate are raising the sector's contribution to sustainable energy generation and promoting the recovery of secondary materials. Further issues were the future of the landfill sector, waste disposal charges and the transposition of European legislation into Dutch policies.

Daan den Ouden
(AVR Bedrijven),
vice-chair of the Dutch Waste
Management Association:
*'The sale of AVR Bedrijven
for 1.4 billion euros is a clear
example of market confidence
in high quality waste
management
services.'*





In 2003 waste incineration replaced 7.8 petajoules of energy from fossil fuels

Waste Framework Directive must clarify definitions

The existing European Waste Framework Directive (WFD) dates from 1975. Proposals for a new WFD came to light at the end of 2005. Clear definitions of waste disposal and recovery are important elements in the revision of the WFD, but the European member states will not reach agreement on these definitions without a struggle. The Dutch waste sector considers the generation of energy from the incineration of waste in a municipal solid waste incinerator (MSWI) to be a form of recovery. If the European Union confirms this, MSWIs will be given the same status as cement kilns and coal-fired power stations that co-fire and co-incinerate waste. They will thus acquire a stronger position with respect to companies which do not have to invest as much in flue gas cleaning because they are subject to lower emission standards. Like co-combustion of waste in a cement kiln or coal-fired power station, energy generated in an MSWI reduces the use of fossil fuels. The effect on climate change is the same wherever fossil fuels are replaced. Another point of contention in the revised WFD is the introduction of the term 'end of waste'; when does a waste stream cease to be waste? Once waste materials are no longer classified as waste they fall under a different set of rules, and waste companies fear that it will be too easy for some industries to get around the waste legislation. The Dutch waste sector argues that only monostreams that are precisely and uniquely described should be eligible for end-of-waste status. These include compost, and granulated rubble. For the time being it remains unclear whether the new WFD will contain such precise definitions or more general criteria. The risk of the latter is that they are open to a range of possible interpretations and thus fail to resolve the uncertainties.



Revision of the building materials regulations

The Building Materials Decree is being recast by order of the lower house of parliament. The main complaints from the sector were about the complexity of the decree, the stringent standards that frustrate reuse and recycling of materials, the high administrative costs and lack of compatibility with European regulations. The Dutch Waste Management Association is represented in the Building Materials Decree project group, established by the Confederation of Netherlands Industry and Employers (VNO-

NCW), through which it seeks to influence the drafting of the new decree. During the course of 2005 the government's intentions for the new decree became clearer. It wants to establish a single order in council that sets out the regulatory framework, with additional regulations, such as the new emission standards, contained in accompanying ministerial orders. By the end of 2005 the new standards that were taking shape appeared to be favourable for the reuse and recycling of building materials.

Along with the revision of the decree, a separate set of standards on the use of soil (loose earth, sand, clay, loam, etc.) and dredged material is being introduced, which may have far-reaching economic consequences for the cleansing and landfill sectors. Under the existing standards some of the waste streams cannot be cleaned and must be landfilled and residue remaining after treatment must also be landfilled. Landfill operators now process almost a million tonnes of soils and dredged



material. Under the new policy this could be severely reduced.

In view of the ongoing revision of the Building Materials Decree, State Secretary Van Geel decided to extend the period of validity of the special category for MSWI bottom ash in the Building Materials Decree by one year. The waste incineration sector cannot commit to major investments in improving the quality of incineration capacity until a definite set of

new standards has been adopted. Research has shown that these investments will cost millions of euros. In return for extending the applicability of the special category for bottom ash, Van Geel asked the sector to draw up an implementation plan setting out the action to be taken and a timetable for delivering a product that meets the new quality standards. This will ensure that MSWI bottom ash can continue to be used in the construction industry in 2007.

Diederik Gijbers
(Van Gansewinkel),
vice-chair of the Dutch Waste
Management Association:

'The sector is also making strides in the field of logistics. We are busy experimenting with alternative fuels and extra long vehicles, and are transporting more waste by water and rail.'

POP Regulation sets limit values for dioxins

The European Commission proposed the adoption of limit values for dioxin concentrations in residuals, such as MSWI fly ash, in the tighter legislation on persistent organic pollutants (POPs). The Dutch Waste Management Association, supported by the Dutch govern-

ment, instituted legal proceedings on the consequences of this measure for Dutch MSWIs. The recycling of fly ash was subsequently acknowledged and later in 2005 the European Commission proposed limit values for dioxins achievable by the sector.

REACH affects use of secondary materials

In 2005 the European Union decided to exclude waste materials from the scope of the REACH Directive (Registration, Evaluation and Authorisation of Chemicals). Nevertheless, this legislation appears to frustrate the use of secondary materials because chemical processes are used in their production. The sector resists

this development because these materials fall under the waste management regime; extra regulations only lead to more administration and higher costs, without any additional environmental benefits. The use of secondary materials benefits the environment because primary raw materials are conserved as a result.

Second Waste Conference successful

The second Waste Conference, held on 5 October 2005, was organised by the Dutch Waste Management Association and the Ministry of Housing, Spatial Planning and the Environment, with support from the Association for Refuse and Cleansing Management. The organisers judged the event to be a success. More than 250 participants attended the plenary presentations and two workshop sessions, where current developments on the European waste market were reviewed and discussed. The 2006 Waste Conference will be held on 4 October.





Europe tightens export rules

In 2005 the European Union completed the revision of the Waste Shipment Regulation (WSR). The European Parliament wanted much stiffer regulations to prevent improper waste exports. The revised WSR, which comes into force at the beginning of 2007, gives European member states more opportunities to refuse waste shipments based on their own environmental quality standards. The Dutch Waste

Management Association fears that this will put the free market for waste in Europe at risk. The grounds for refusal may create even more impediments to waste transfers and lead to litigation. The sector is of the opinion that definitions of the disposal and recovery of waste should not be settled via the WSR but in the European Waste Framework Directive. The WSR should be limited to procedures for

regulating waste shipments that are enforceable but do not lead to excessive administrative costs. The Dutch Waste Management Association is cooperating with its Belgian and German sister organisations to agree common environmental standards, and so remove impediments to waste transfers between their countries.

The waste sector has reduced its CO₂ emissions from 12.7 million tonnes in 1990 to 0.8 million tonnes in 2004

Animal By-Products Regulation amended

After many years, efforts by the Dutch waste sector to obtain realistic provisions in the Animal By-Products Regulation have been rewarded with a positive outcome. The Regulation could have far-reaching consequences for companies that process and compost animal waste. The first proposals by the European Commission placed unreasonable demands on these companies. Following close and successful negotiations with Dutch and other policymakers, indications are that the Dutch systems will face no insurmountable problems. The sector is working on the implementation of the Regulation in consultation with the Dutch agriculture ministry and the Food and Consumer Product Safety Authority (VWA). The companies have to comply with the provisions of the Regulation from 1 January 2007.



Waste companies take their social responsibility towards present and future generations seriously. Sustainable waste management has social, ecological and economic dimensions.

Processing of hazardous waste continues

On 1 January 2005 the last Dutch rotary kiln incinerator was shut down, bringing this option for processing hazardous waste to an end. In addition to the existing limited processing capacity for hazardous waste at several Dutch

companies, a few specific waste streams can be incinerated in MSWIs. In consultation with the Ministry of Housing, Spatial Planning and the Environment, the Dutch Waste Management Association has prevented hold-ups in the

processing of hazardous waste and succeeded in keeping down the administrative costs of applying for export permits.

The processing of hazardous waste is also receiving attention at European level. The Hazardous Waste Directive is being revised and duplication with other European legislation removed. The Dutch Waste Management Association stresses the importance of retaining specific legislation for hazardous waste and is therefore opposed to integration of the Hazardous Waste Directive into the Waste Framework Directive.

The review of the structure for the disposal of specific hospital waste moved into its final stage in 2005. The study was conducted at the express request of the healthcare institutions, which believe that this waste can be processed at lower cost. One option proposed in 2005 was to pre-treat the less hazardous waste streams from healthcare institutions followed by incineration in MSWIs, instead of processing at the ZAVIN dedicated incinerator for specific hospital waste. The Dutch Waste Management Association has doubts about this. The potential exposure risks associated with this route must first be clearly identified.



Sector's own compost quality label

The Composting Section has developed its own compost quality label as a guarantee of food safety and to ensure the continued sale of compost to the arable farming sector. The label meets the quality standards for contamination with glass fragments from various food safety manuals for growers of arable crops. In 2005 six companies were awarded the sector's quality label. Currently eighty per cent of all VGF compost sold carries a certified quality label. There are three such labels. Besides the sector's own label, these are the KIWA label and the German Bundesgütegemeinschaft Kompost label.



Separate collection of household organic waste worthwhile and cheap

At the end of 2004 the government decided to continue the separate collection of organic household waste (vegetable, garden and fruit waste, VGF), but gave local authorities a wider range of options for meeting this obligation. In future, they will be allowed to change the frequency of collection, limit separate collection to one or more fractions, or mix this household waste with other compostable waste streams. The new rules are expected to come into force in 2007. In 2005, however, the sector

was unpleasantly surprised when a number of local authorities decided to cancel the separate collection of VGF in anticipation of the government's revision of the regulations. The Dutch Waste Management Association's stance is

that these local authorities underestimate the environmental and cost benefits of collecting and composting VGF. Research has shown that this processing route is still cheaper than other methods. Municipal councils that decide to stop separate collection of VGF will eventually have to pass the extra costs on to the public. Luckily the vast majority of local authorities recognise this fact and are continuing with their existing policies. The sector hopes that the other authorities will come round to this position.

Ger de Jong
(De Meerlanden),
chair of the Composting
Section:

'Some municipalities are rashly dispensing with a collection infrastructure that benefits the environment and saves money for their residents.'



Compost good for the soil

Composted VGF is a good soil conditioner. It also helps to curb CO₂ emissions and its use reduces the need for pesticides and artificial fertilisers. Political recognition of the value of compost was won by the efforts of the Dutch Waste Management Association, which wants to safeguard the agricultural market for compost. During the parliamentary debate on the revision of the fertilisers legislation, Dutch MPs proposed that only a proportion of the mineral content of compost should count towards the

use standards under the Fertilisers Act. Dutch fertilisers legislation had to be revised following the judgement against the Netherlands for failure to adequately transpose the Nitrates Directive into national law. The Fertilisers Act was amended to ensure correct implementation of the directive before the deadline of 1 January 2006. At the end of 2005 it was not yet clear whether the European Commission will support the use of compost and accept the Dutch approach to setting these standards.



New stimulus for energy from waste

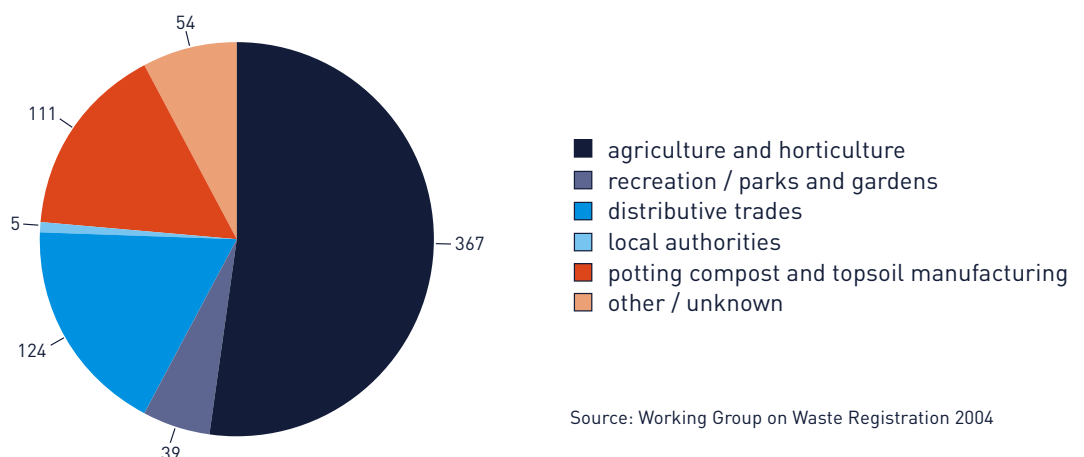
After a long gestation period, the Ministry of Economic Affairs' new incentive scheme for waste incinerators (MSWIs) under the Electricity Production (Environmental Quality) Act was finally announced at the end of 2005. The amendments to the subsidy scheme for sustainable energy from waste will apply from 1 July 2006. The existing efficiency requirement of 26 per cent will be replaced by a graduated scale of subsidies, starting from 22 per cent efficiency. The higher the efficiency, the higher the level of payment per kilowatt hour of electricity delivered. The production of heat can also be included in the efficiency calculation. The sector is pleased that the Government supports the contribution made by energy from waste in combating climate change. Although the new regulation is an incentive for the sector to invest in new incineration capacity, the sector would like to see subsidies for heat production projects as well. A growing number of MSWI operators are planning to invest in mains networks for delivering heat and an adequate and solid subsidy

Jan Rooijackers
(Twence Afvalverwerking),
chair of the Incineration
Section:

'We applaud the recognition given to energy-from-waste, but it's a pity that we are the only sector with efficiency requirements.'

scheme would encourage them to take the final decision. The regulation limits payments to a maximum period of ten years, which still leaves the sector with a certain degree of uncertainty. The regulation remains in force until 2008, which means that applications for subsidies must be received by 31 December 2007 at the latest, when all building and environmental permits for the relevant plant also have to be obtained. Incineration capacity not operational on 1 January 2008 will not qualify for the subsidy. Any plant coming on stream a year later, for example, will only qualify for a maximum of nine years.

Sales of 700 kilotonnes VGF compost in 2004 by sector



Source: Working Group on Waste Registration 2004



Long-term packaging policy

During the past fifteen years the packaging industry and the Dutch government have worked to achieve the collection targets for various types of packaging under three packaging covenants (voluntary agreements). On 1 January 2006 these covenants were replaced by an order in council which gives producers the responsibility for the return and/or collection and recycling of packag-

ing waste. In the opinion of the Dutch Waste Management Association, the research conducted to identify a structure that delivers the greatest levels of reuse and recycling of packaging places too much emphasis on the post-separation of household waste, while the social costs and environmental impacts of this approach have not yet been properly investigated and described. The method has yet to

be tested in practice on a large scale. Moreover, no account has been taken of the costs already incurred by government and the business community in establishing a well thought out, sustainable and cost-efficient structure for waste disposal in the Netherlands. The waste sector therefore insists that further studies should be conducted into alternative arrangements.



Landfill sector looks forward to a sustainable future

The landfill sector is considering its future in discussion with the Ministry of Housing, Spatial Planning and the Environment. As the amount of waste destined for disposal in landfill decreases, operators are finding it increasingly difficult to remain cost-effective. Further decline in the volume of waste destined for landfill will make it increasingly hard for landfill operators to guarantee adequate

reserve waste disposal capacity in a commercial environment. The main principle is that only waste that cannot be reused, recycled or incinerated is landfilled. A single large utility company cannot be established in the short term but this is definitely a long-term prospect. In the meantime, supporting measures can provide some relief. These include support for aftercare, waste disposal charges, excavation of old landfill sites and a revision of the Building Materials Decree.

The landfill sector does not want to saddle future generations with environmental problems. The Sustainable Landfill Foundation (Stichting Duurzaam Storten) is investigating new landfill techniques that will reduce environmentally damaging emissions to zero within a single generation (30 years) and establish permanently safe landfill. This can be achieved by selecting a mix of wastes and landfill techniques that make optimal use of the physical and biochemical processes in the waste. Such an approach will bring the landfill body into equilibrium with the environment much sooner and emissions will be rendered harmless much more quickly. The feasibility of this approach has been demonstrated. In 2005 the Sustainable Landfill Foundation entered the last stage of its research. The scientific findings are being interpreted and translated into practical recommendations, including their economic and legal feasibility. The reports will be published in 2006.

Peter Louwman
(Delta Milieu), chair of
the Landfill Section:

'Taking the sustainable landfill route is in the interests of future generations. We don't want to heap our problems onto them or the environment.'

Study of CO₂ emissions by the waste sector

The Dutch Waste Management Association initiated a study into the trends in CO₂ emissions in the Dutch waste sector from 1990 to the present. The study examines total emissions from the incineration, compost-

ing and landfill of waste. Emission reductions are being achieved by treating waste differently and by introducing cleaner processing technologies. The results of the research are expected in the course of 2006.

Clean waste transport

Members of the Dutch Waste Management Association are making the case for cleaner transport in the fight against air pollution. Companies are fitting particulate filters on refuse collection vehicles and street sweeping machines and equipping vehicles with engines that run on environmentally-friendly vegetable oils. These measures reduce emissions of soot, fine particulates and greenhouse gases. Some companies are experimenting with longer and heavier goods vehicle combinations that run on vegetable oil, increasing transport efficiency and delivering extra fuel savings of four to thirty per cent.





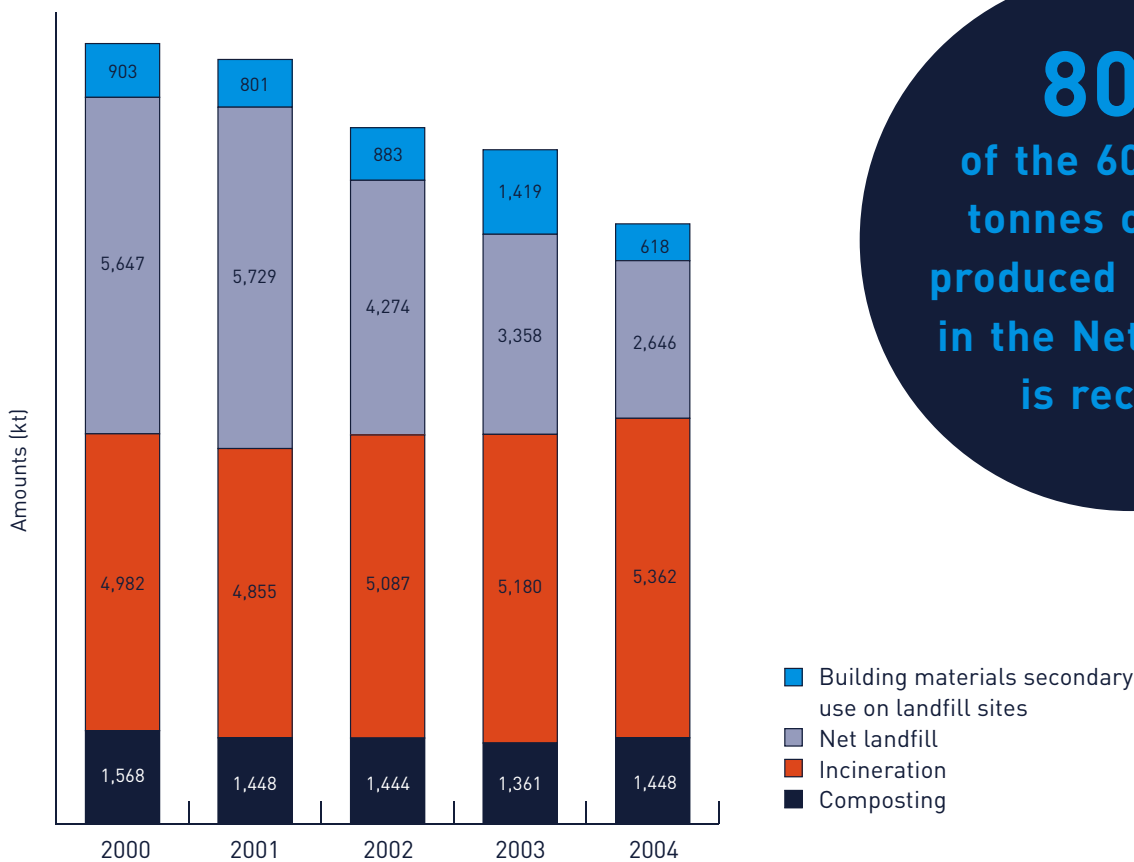
We must deal with the 'free riders' who make wrongful use of the acquired rights of the sector and give it a bad image. The waste sector has its own responsibilities in this regard.

Cooperation with the Environmental Inspectorate

The sector is occasionally confronted with news of 'environmental crimes by waste companies'. The Association naturally supports the enforcement of environmental regulations and calls to task those members that fail to comply with them. Studies have shown that these companies are generally not members of the Dutch Waste Management Association, but such reports give the whole sector a bad name. The Association wants to deal with this blackening of the waste sector's reputation and contacted the Environmental Inspectorate about this in 2005. Taking this responsibility upon ourselves is in keeping with the spirit of

the present government's policies. The sector is working with the Environmental Inspectorate to take on the free riders that give the sector a bad image. Inspections of company premises give the Environmental Inspectorate a clearer picture of day-to-day practice and should help to improve the efficiency of their enforcement actions. The sector and the Inspectorate intend to make further agreements on reporting by members of the Dutch Waste Management Association of abuses that reflect badly on the whole sector. This cooperation may eventually lead to a reduction in the amount of supervision required.

Amount of waste processed in 2000 to 2004



80%
of the 60 million tonnes of waste produced each year in the Netherlands is recycled

Source: Working Group on Waste Registration 2004





Clear regulations and enforcement are important ingredients for professional operation in the waste sector. Licensing must be as efficient as possible. The current government policy review may lead to a reduction in the administrative burden.

Licensing decree splits sector in two

The revised Environmental Management (Establishments and Licences) Decree places smaller waste companies (handling up to 15,000 tonnes of waste per year) under the responsibility of the municipal councils, while all licensing for large companies remains the responsibility of the provincial councils. The resulting differences in interpretation of the legislation have put professional composting companies under unfair competition from small municipal waste operators. Other market segments, such as construction and demolition waste, also suffer from this disadvantage. Waste treatment companies are finding that local authorities often lack the expertise required to fully comprehend the complex issues involved in waste management. Moreover, some local authority officers are responsible for a variety of tasks with conflicting interests: waste disposal, waste collection, licensing and sometimes even the management of municipal waste facilities. A working group was established in 2005 to identify problems resulting from the revised Decree. The Dutch Waste Management Association is represented in the working group. The sector would prefer all companies to fall under the responsibility of the provincial councils.

Fred Knitel (Shanks),
chair of the Treatment,
Recycling and Collection
Section:

'The entrepreneurial spirit of waste companies must not be frustrated by complicated and lengthy licensing procedures.'

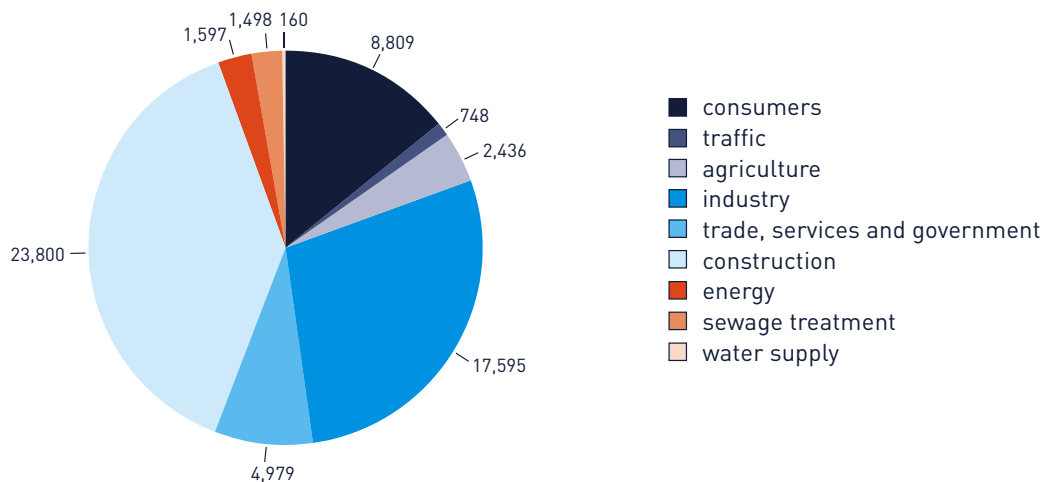


Introduction of Annex II of the Landfill Directive

All landfill operators must be in possession of a licence that fully complies with the Landfill Directive by 16 July 2009. Some of the provisions of this directive were further elaborated in Annex II of the Directive after the main directive had been transposed into Dutch legislation. This Annex was adopted in December 2002 and still has to be incorporated into Dutch policy. Annex II mainly covers criteria for the acceptance of waste and acceptance procedures for landfill sites, a complex issue that was subject to further study. The Dutch Waste Management Association was well represented in the committee that supervised these studies.

About 30 per cent of all sustainable energy generated in the Netherlands is energy from waste

Total waste arisings in the Netherlands in 2003 (61,622 kilotonnes)



Source: SenterNovem, Uitvoering Afvalbeheer



Implementation of the IPPC Directive

The European Commission finalised the Reference Documents on Best Available Techniques (BREFs) for waste treatment and incineration. The Dutch Waste Management Association is keen for member states to make maximum use of the opportunities open to them to implement the BREFs. The sector supports the view that the minimum standards set down in the National Waste Management Plan should form the prime guidance and that the BREFs should be consulted when addi-

tional information is needed. Moreover, the aim should be to achieve a uniform application of standards and avoid different interpretation of the BREFs by the individual provincial administrations for licensing purposes. After consultations with the Dutch government in 2005 it was decided that the licensing framework would consist of the BAT conclusions in the BREFs as well as the National Waste Management Plan, accompanied by a memorandum on their interpretation.

The permits for all companies falling under the regime of the IPPC Directive (Integrated Pollution Prevention and Control) must be updated and amended by 31 October 2007. The Dutch Waste Management Association will work with the environment ministry to guide and assist its members in this process and reach agreement with the licensing authorities.



Wastes notification decree and AMICE: single reporting centre

The new Commercial, Institutional and Hazardous Wastes (Notification) Decree, which came into force on 1 January 2005, gives responsibility for the management of all waste streams back to the Ministry of Housing, Spatial Planning and the Environment. The introduction of the accompanying electronic notification system, AMICE, has not been without problems. Considerable difficulties have been experienced with obtaining access codes and company numbers. A working

group to discuss technical difficulties and propose solutions for smooth operation of the notification system was set up in 2005 and met frequently during the year. The government acknowledged the problems and postponed the date for compulsory registration of waste streams via AMICE until 16 July 2005. The Dutch Waste Management Association made further arrangements with the environment ministry to reduce the administrative costs of notifying wastes.



Our members put the safety of their employees high on their list of priorities. Waste companies are working to raise awareness of safety issues to improve the culture of safety and encourage employees to question each other's working practices if the need arises.

Safety is a way of thinking

The waste sector makes every effort to keep the number of occupational accidents and injuries as low as possible. In 2005 members of the Dutch Waste Management Association took part in several safety improvement projects and introduced concrete measures into their working practices. The key objective is to make employees more aware of the importance of safe working practices. Greater awareness of safe working practices is being encouraged

through information campaigns and training programmes. The falling accident figures are proof that these efforts are bearing fruit.

In 2005 the Sewer Maintenance and Street Cleaning Section presented an updated version of the handbook *Safe Working in Sewers*. On 1 July Jan Hendrik Klein Molekamp, chair of the Dutch Waste Management Association, presented the first copy to Henk van Hoof, the state



secretary for social affairs and employment. The sector hopes that the publication of this handbook will stimulate wider interest in professional sewer maintenance. Unsafe situations will become a thing of the past once all companies active in the Netherlands follow the same safe working practices. This is in the interests of their employees, the public and their clients, as well as the image of the sector as a whole. The members of the Dutch Waste Management Association have committed themselves to adopting the working practices described in

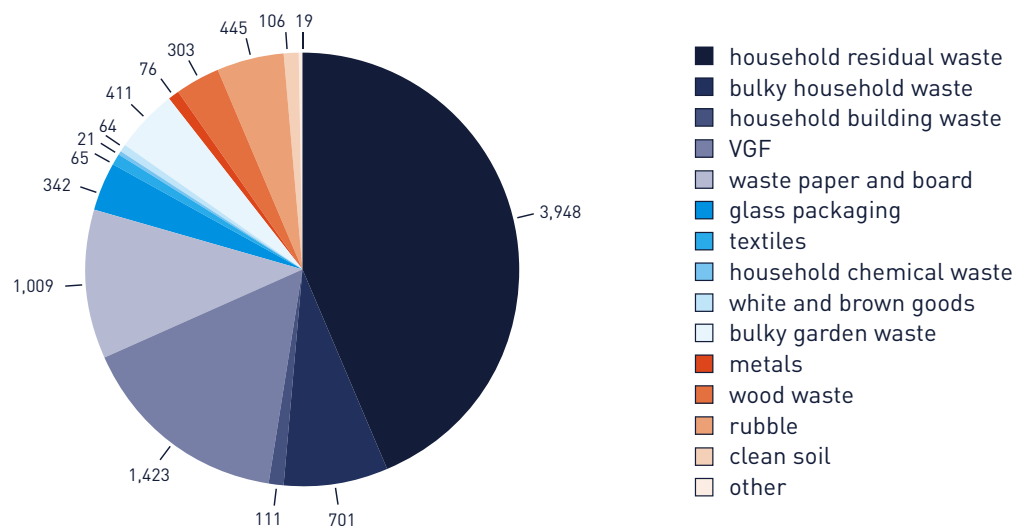
the handbook, a key rule being that two people must always be present when any work is carried out. The handbook was well received by government, which endorsed the sewer cleaning and inspection methods it prescribes to make safe working in sewers standard practice. The ministry recommended that the Labour Inspectorate adopts the procedures set down in the handbook for its own inspection work.

Martien van der Valk (vandervalk + degroot), chair of the Sewer Maintenance and Street Cleaning Section:

'Adopting a general set of standards is highly important because some companies still don't work according to agreed practices, which results in accidents.'



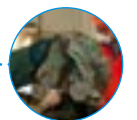
Total waste arisings from Dutch households in 2004 (9,044 kilotonnes)



Source: Statistics Netherlands

Improved sewer inspection course

A new course on the visual inspection of sewers has been developed that reflects the new European sewer inspection standards. The sector is dissatisfied with the quality and admission requirements for the course, and is working with RIONED Foundation to develop a tailor-made course that matches the educational level of aspiring course participants. The sewerage sector is applying a range of criteria to raise its effectiveness. The use of personal logbooks has been introduced and a starters' course has been developed. Individual companies remain responsible for ensuring that a sufficient number of qualified people take the new course.





Waste sorting companies inspected

During several months in 2005 the Labour Inspectorate visited the Dutch waste sorting companies. These inspections focused primarily on physical stress or strain and exposure to materials and noise. Infringements were discovered at a few companies. The Dutch Waste Management Association saw to it that no non-statutory requirements were imposed and that practical solutions were made available. For example, the sector believes that the Inspectorate's insistence that all engines are fitted with particulate filters goes too far because it takes no account of the depreciation period of some engines. There is as yet no limit value for diesel engine emissions and therefore no quantitative benchmark for testing the practical value of making particulate filters obligatory. Of course, the waste companies take their responsibility to reduce particulate emissions seriously; when old diesel engines are written off they are replaced by cleaner models. The Ministry of Social Affairs and Employment decided to postpone this obligation until 1 January 2007.



First KIWA labels for the sewerage sector

On 11 October 2005 vandervalk+degroot was the first company to receive the KIWA labels for safety and quality in the sewerage sector. These labels are proof that the firm works to the highest quality and safety standards for the cleaning and inspection of sewers and drains. The Dutch Waste Management Association hopes that other companies will soon follow suit. The sewerage sector developed the assessment guidelines to raise overall operating standards.





Production and sale of incinerator residuals in 2004

Residue	Number of incinerators	Arisings (tonnes)	Stockpile drawdown (tonnes)	Recovery (tonnes)	Landfill (tonnes)
• Bottom ash (processed)	11/11	1,200,000	500,000	1,700,000*	
• Fly ash	11/11	82,900		47,900	35,000
• Boiler ash	4/11	2,100			2,100
• Ferrous metals	11/11	126,000		126,000	
• Nonferrous metals	11/11	10,600		10,600	
Flue gas treatment residues					
• Filter cake/residues	8/11	8,000			8,000
• Flue gas treatment salts	5/11	25,900		12,300	13,600
• Sludge	2/11	3,300		1,600	1,700
• Gypsum	1/11	1,890		1,890	
Total	11	1,460,690	500,000	1,900,290	60,400

* Approximately 65% of bottom ash recovery relates to civil engineering projects, while 35% was recovered through beneficial use on and around landfill sites.

Source: Annual Report 2004, monitoring of residuals from the incineration of waste and sewage sludge

Twenty per cent of employees in the waste sector are women



Stronger focus on MSWI residuals

The Incineration Section appointed an external consultant to ensure the continued recycling of MSWI bottom ash and increase the volume of sales. The consultant advised on the revision of the Building Materials Decree, the repeal of the special category for MSWI bottom ash in the Decree and improving the quality of MSWI bottom ash as a raw material. He also worked on improving the market position of incinerator residuals. In 2005 the leaching test for MSWI bottom ash was amended to bring it more into line with actual conditions in the field and was adopted by the NEN, the Dutch organisation for standards and standardisation. Tests under anaerobic conditions give a more realistic picture of the quality of this secondary building material.



Dutch Waste Management Association: representing the interests of the whole waste chain

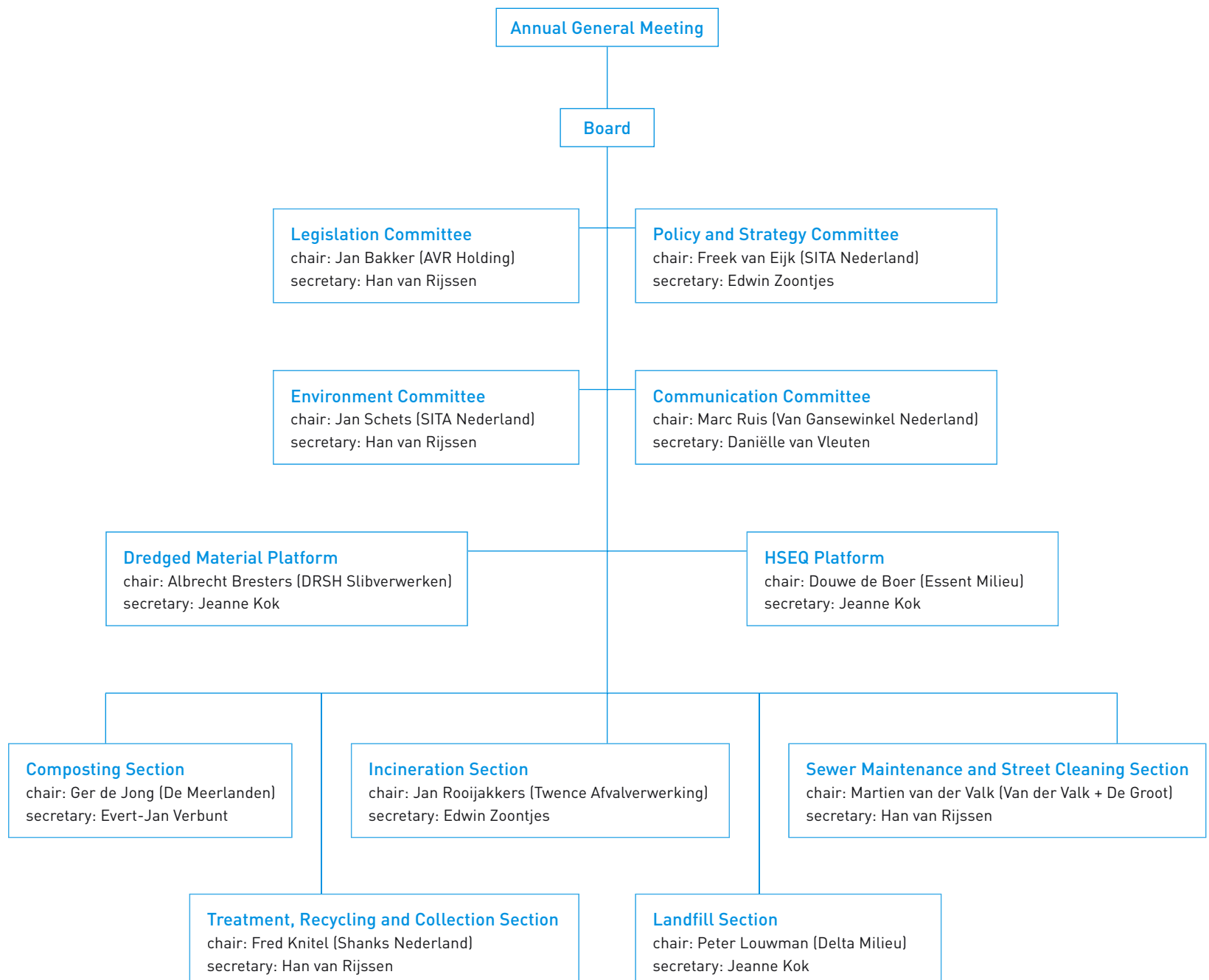
The Dutch Waste Management Association represents the interests of Dutch waste companies at the national and international levels. Our members are active throughout the whole waste chain and are responsible for collecting, recycling, processing, composting, incinerating and landfilling waste. Some companies are active in sewer maintenance.

The Dutch Waste Management Association works for a healthy and balanced business climate in the Netherlands and Europe and promotes efficient, practicable and sustainable waste management. The Dutch Waste Management Association represents about two-thirds of the Dutch waste market and negotiates on their behalf with government

and other organisations. The Association is based in 's-Hertogenbosch, the Netherlands, and has a European office in Brussels.

More information about the Association is available on our Dutch website: www.verenigingafvalbedrijven.nl

Organisation chart (At April 2006)



Members (at April 2006)

- Afvalwaterketenbedrijf (HHNK)
- N.V. Afvalzorg Holding
- A&G Maasvlakte
- Van den Akker BV
- AKZO Nobel Base Chemicals BV
- AVR Bedrijven
- AVRI
- NV Afvalverbranding Zuid-Nederland (AZN)
- Bowie Afvalstoffen Recycling BV
- Bredox bv
- Corus Staal BV
- DELTA Milieu B.V.
- A. van Dorrestein BV
- DRSH Zuiveringslab nv
- Dusseldorp Groep B.V.
- Ecomineraal
- Essent Milieu
- Feniks Recycling
- Van Gansewinkel Groep b.v.
- Gevudo Afvalverwerking N.V.
- GMB Rioleringsstechnieken b.v.
- GMB Slibverwerking B.V.
- GP Groot Container Service bv
- Grontmij NV
- Helma Reinigingsdienst
- Heros Sluiskil B.V.
- Heru BV
- Holland Collect N.V.
- HVC
- Inter-CheM b.v.
- Jansen Rioolreiniging
- Koeweit Oliehandel B.V.
- De Meerlanden Holding NV
- Metabel B.V.
- Metalchem / DRS B.V.
- J. en A. van den Noort Transport
- OGAR V.O.F.
- M.J. Oomen Leidingtechniek B.V.
- Orgaworld
- Ozon B.V. / Chemclean B.V.
- W.A. van Peperzeel B.V.
- Purva
- Remat Chemie B.V.
- Remondis Argentia b.v.
- Renergy BV
- Riool- en Veegbedrijf M. van Dijk B.V.
- Shanks Nederland BV
- SITA Nederland Holding
- Smink Afvalverwerking B.V.
- NV Slibverwerking Noord-Brabant
- Sortiva BV
- Stadsgewest Den Bosch
- Afvalverwerking Stainkoeln B.V.
- Stercompost
- Teeuwissen Rioolreiniging BV
- Twence Afvalverwerking BV
- Van der Valk + de Groot b.v.
- VAR BV
- Vecom Industrial Services B.V.
- Van Vliet Recycling Hoek van Holland
- Vuilverwerkingsbedrijf Noord-Groningen
- Waternet
- Wolfswinkel Reiniging
- Wubben Handelsmaatschappij BV
- ZAVIN c.v.

Representatives in international organisations (at April 2006)

Confederation of European Waste-to-Energy Plants, CEWEP

- G.L. Nieuwendijk vice-chair

European Compost Network, ECN

- J. van Haeff (Essent Milieu) board member

European Federation of Waste Management and Environmental Services, FEAD

- J.R. van Veen (Shanks Nederland) Working Group 3, Material Recycling
- J. van Haeff (Essent Milieu) Working Group 4, Biological Treatment
- D.J. Spanjaard (Essent Milieu) Working Group 5, Thermal Treatment / Energy Recovery, chair
- H. Scharff (Afvalzorg Holding) Working Group 6, Landfill, vice-chair
- J.A. Bakker (AVR Bedrijven) Working Group 8, Legal Aspects
- D.J. Spanjaard (Essent Milieu) Task Force on Greenhouse Gas Emissions Trading

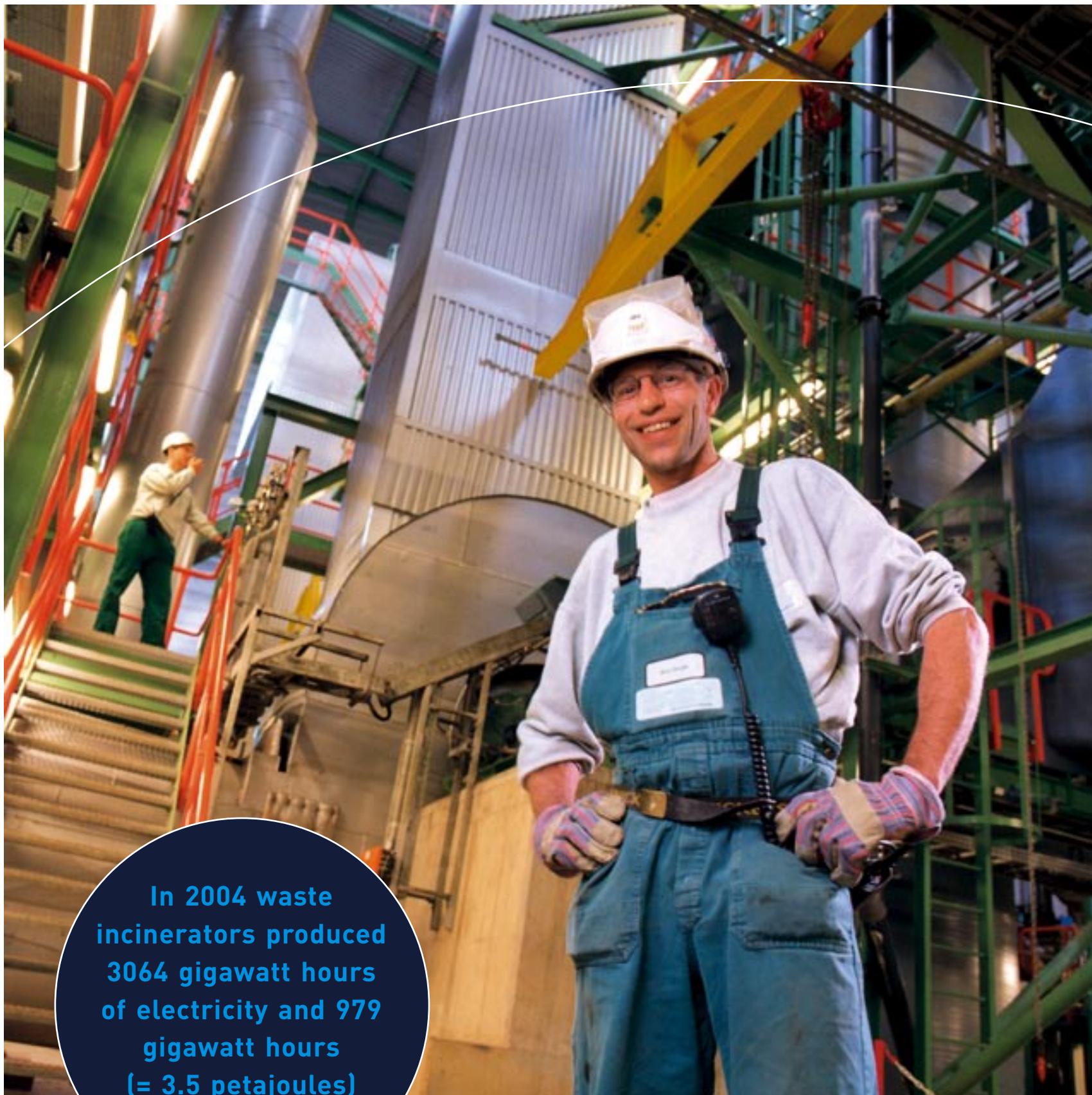
Board of the Dutch Waste Management Association (at April 2006)

- Jan Hendrik Klein Molekamp chair
- D. den Ouden (AVR Holding) vice-chair
- D.T.G. Gijsbers (Van Gansewinkel Nederland) vice-chair
- A.H. Krom (Afvalzorg Holding) treasurer
- F.C.A.A. van Eijk (SITA Nederland)
- W.L. Geerling (Essent Milieu)
- G.J. de Jong (De Meerlanden)
- A.J. Knitel (Shanks Nederland)
- P. Louwman (Delta Milieu)
- J.T.P.M. Rooijackers (Twence Afvalverwerking)
- M.P.J.T.E. van der Valk (Van der Valk + De Groot)
- A.P.P. Donders (executive director of the Association) secretary

Memberships

The Dutch Waste Management Association is a member of three European associations: The European Federation of Waste Management and Environmental Services (FEAD), the Confederation of European Waste-to-Energy Plants (CEWEP) and the European Compost Network (ECN). The Association's membership of these organisations gives the Dutch sector an important voice in the development of European waste policies. The Dutch Waste Management Association is also a member of the Confederation of Netherlands Industry and Employers.





In 2004 waste incinerators produced 3064 gigawatt hours of electricity and 979 gigawatt hours (= 3.5 petajoules) of heat

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