

Rebecca Pow MP
Parliamentary Under-Secretary of State, Department for Environment, Food & Rural Affairs (Defra)
House of Commons
London
SW1A 0AA

An open letter

23 September 2020

Dear Minister,

I am pleased to write on behalf of our members to inform you that the Environmental Services Association (ESA) has committed to a new *Standard for Responsible Export*, which will henceforth guide our members' approach to the responsible export of secondary raw materials from the United Kingdom.

The UK is one of the largest net exporters of these commodities in the world and is dependent upon access to viable export markets. The country clearly therefore has a significant vested interest in the reputational integrity of both its outputs and of their end destinations.

These measures will help ensure that the millions of tonnes of material recycled by ESA members every year will continue to be handled responsibly and put to good use wherever final reprocessing takes place; and that the ESA continues to be an international standard-bearer for responsible resources and waste management.

As you will know, the substantial rise in UK recycling rates over the past twenty years has been supported by significant private and public sector investment in the provision of containment and collection services, and domestic sorting and processing capacity for secondary materials, but the end markets for some of these materials remain close to overseas manufacturing hubs, particularly in South East Asia.

Measures due to be introduced through your department's Resources & Waste Strategy and through the plastics tax, both of which we support, should stimulate further domestic demand for these materials in future, but overseas markets remain an essential component of our national recycling system.

The vast majority of this valuable international trade in secondary materials is conducted without incident, but ESA members have become concerned following a small number of cases where material originating from the UK and other developed nations, has either been illegally dumped or managed irresponsibly overseas resulting in unacceptable environmental and social damage. There has been particular public scrutiny of relatively new markets such as Malaysia and Indonesia, where recycled material trade transitioned following the introduction of significant restrictions by China in 2018 which was previously the world's largest market for secondary material exports.

To ensure ESA members can continue exporting with confidence the *ESA Standard for Responsible Export* has been designed to ensure British material handled by our members is put to its intended use and does not contribute to environmental incidents.

This standard sets out a number of principles which members will abide by to achieve this, which include:

- Only exporting material for which no competitive domestic market can be found;
- Working with others across the sector and within government to establish objective standards for export material quality - including a clear definition of “de minimis” for allowable non-target material;
- To only export materials to non-OECD markets which strictly adhere to all internationally recognised standards on purchase, sales and shipment documents, or which require no further sorting;
- And to bolster due diligence methods to assess the practices of overseas buyers

However, this is not a problem the recycling and resource management sector can tackle in isolation, and it is incumbent upon all those involved in recycling – from producers and retailers to consumers and local authorities – to play their part in helping to ensure that UK recyclable material is of the best quality and free from contamination.

We also continue to call upon Defra and the Environment Agency to strengthen domestic enforcement against waste crime, which will encourage legitimate exports of high quality secondary raw materials while making it easier to identify and drive out criminals from this business.

I include a copy of the full principles of ESA’s *Standard for Responsible Export* with this letter and would be happy to meet to discuss these issues with you further.

Yours sincerely,

Jacob Hayler
Executive Director, Environmental Services Association (ESA)

Environmental Services Association (ESA)

Standard for Responsible Export

Members of the Environmental Services Association agree to:

1. Only export material for recycling for which the UK lacks competitive domestic capacity to reprocess our recycled materials.
2. Ensure that best practice quality assurance systems are in place to deliver material that meets end market requirements and legal compliance. ESA will aim to, in partnership with local authorities and other organisations across the sector, develop robust industry standards.
3. Provide end destinations by country to local authorities and business customers where requested, and where contractual obligations allow.
4. Only export recognised mixed grades of material to non-OECD countries that strictly adhere to all internationally recognised documents on purchase, sales or shipment and which require no further separate sorting stage to meet the relevant grade, as well as single streams of recyclables.
5. Commit to having in place a robust audit process, capable of independent audit, for overseas facilities in line with quality assurance expected in the United Kingdom.
6. Require evidence from overseas recyclers, brokers and dealers that the waste is effectively processed and to broadly equivalent standards.
7. Require evidence from overseas recyclers, brokers and dealers that process losses/residues are properly managed.