

**Schou, Lone**

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**Fra:** Schou, Lone  
**Sendt:** 14. juni 2010 08:46  
**Til:** 'Kees.denHerder@minvrom.nl'  
**Emne:** VS: New Dutch ban on export of plasterboard waste to Germany's Kali halden  
**Opfølgingsflag:** Opfølgning  
**Flagstatus:** Rød  
**docId:** <http://esdh.cfk.dk/captia/DOK2167175>  
**SJ:** -1

Goodmorning Kees,

Henrik Lund-Nielsen has forwarded your mail corenspondence to me as I'm the one in Denmark dealing with the issue "is the treatment of gypsum at the Kali Haldes recovery or disposal".

I would very much like to talk to you as soon as possible - I imagine that if you have been in Stockholm last week it must be due to the Mercury meeting - but I still hope that you have time to talk to me to day or to morrow. If you send me a mail when it would be convenient for you I would be glad.

As you might know Henrik Lund-Nielsen has a facility in Denmark as well. In Denmark we do not have any indications on how to treat gypsum waste (yet) as I read you have in your national plan "In our National plan, gypsum plasterboard is indicated as a waste that should be recovered as a material. It is obvious that using it on top of a landfill is a lower "treatment standard".

As such we have asked the Thüringe authorities of there reasons for classifying the treatment as recovery, and they have given us the explanation that as the material substitute a virgin material and as gypsum has been listed as one of the waste types which can be used for this, it can be regarded as recovery. As we as well are using some different kind of waste for landscapemoddeling in Denmark it in our view (and as the German authorities has made there classification) is recovery.

But I'm off cause very interested in hearing the reasons behind your classification.

Hope to hear form you as soon as possible.

best regards  
Lone

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**Fra:** Henrik Lund-Nielsen [mailto:hl@GipsRecycling.dk]  
**Sendt:** 7. juni 2010 00:49  
**Til:** Schou, Lone; Hansen, Jørgen G.  
**Emne:** New Dutch ban on export of plasterboard waste to Germany's Kali halden

Kære Lone og Jørgen

Se nedenfor.

22-06-2010

Det hollandske miljøministerium har netop meddelt os og andre gips recyclere i Holland, at fra og med juli måned vil de ikke tillade eksport af gipsaffald, der går til tyske Kali halden som afdæknings/terrænreguleringsmateriale, idet de hollandske myndigheder betragter en sådan operation som en bortskaffelsesoperation !!!

Det fremgår af hans første email til mig og endnu mere tydeligt af hans svar på mit direkte spørgsmål herom, se mit spørgsmål 1.

Det fremgår også, at de hollandske myndigheder tvivler på det miljømæssigt forsvarlige af den tyske "løsning".

OVAM (den kompetente myndighed for "Flandern", den hollandsk talende del af Belgien) forbyder også eksport af gipsaffald til Kali Halden.

Det burde på denne baggrund være åbenlyst for Danmark, at følge de andre lande og forbyde gipsaffald til Kali Halden senest pr den 1. juli i år.

M.v.h.

Henrik

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**Fra:** Kees den Herder [mailto:Kees.denHerder@minvrom.nl]

**Sendt:** 4. juni 2010 18:55

**Til:** Henrik Lund-Nielsen

**Emne:** RE: Ban on export of plasterboard waste to Germany

Henrik,

1. Yes
2. We announced the companies in the market informally, that we are now preparing enforcement actions. It is at the moment not clear when capacity is available to Carry this out. First step will be that gypsum plasterboard companies will send a letter to the Ministry, to ask explanation. Then we will answer along the lines as indicated below, and this letter is also the input for the enforcement actions.

Beside the legal explanations, one should ask the following question.

The competent authority in Germany for the kali halden, which is the Bergbau-amt, obliged the mines to cover the salt mountains to prevent the contamination of surface and ground water by salts: potassium and sulfates. But when one uses gypsum, even when it is not used directly near the surface, rainwater will dissolve the sulfates and still there will be a contamination of surface waters. So: is this environmental sound management of gypsum wastes ?

Tomorrow I will visit Stockholm for the next week, and I hear that the weather is colder and there will be some rain coming days. But anyway, Stockholm is fine.

Kees

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**Van:** Henrik Lund-Nielsen [mailto:hln@GipsRecycling.dk]

**Verzonden:** vrijdag 4 juni 2010 18:39

**Aan:** Kees den Herder

**Onderwerp:** SV: Ban on export of plasterboard waste to Germany

Dear Mr. den Herder,

I greatly appreciate that you have taken the time to answer my request. Thanks a million times. Two quick, clarifying questions just to be 100%:

1. If pure plasterboard (not mixed with gypsum blocks) is used as a cover material or height/terrain regulating material (in schicht 2) in the kali halden, the Dutch authorities would consider this to be a disposal activity ?
2. The Dutch Authorities are going to ban the export of (pure) plasterboard waste for kali halden/salt waste landfills latest by end of July, should the waste be destined to be used as a cover material and the market will be made aware of it at this time ?

Look very much forward to hearing your - I believe - confirmation of the above.

Have a nice weekend (understand that the weather in Holland is as beautiful as here today).

Henrik Lund-Nielsen

**Fra:** Kees den Herder [mailto:Kees.denHerder@minvrom.nl]

**Sendt:** 4. juni 2010 18:19

**Til:** Henrik Lund-Nielsen

**Emne:** RE: Ban on export of plasterboard waste to Germany

Dear Mr. Lund,

In the Dutch situation, export of gypsum containing waste takes place in the form of a mixture of gypsum plasterboard and gypsum blocks.

Although the materials both contain CaSO<sub>4</sub>, the composition is different.

In the European Waste Shipment Regulation (WSR: 1013/2006), the entry B2040 is a non-hazardous waste (green listed waste): where waste gypsum wallboard or plasterboard arising from the demolition of buildings is mentioned, under the heading "other wastes containing principally inorganic constituents".

One could also regard gypsum blocks or even other building blocks cellenbeton (concrete with calciumoxide etc) as falling under this entry. Many years the competent authorities for the WSR were not totally certain about the export of mixtures under this heading. In a recent Correspondence Meeting in Brussels, it was decided that a mixture should be regarded as un-listed and therefore a notification procedure is obliged to be followed for such streams. So, export of a mixture without a notification is an illegal transport.

Export to a German **salt mine**: only in the case that the wastes are used totally in the area within the mine where a Versatzverplichting is applicable: the Netherlands regards this as destined for recovery. But: when the waste is firstly sorted, and f.i. the plasterboard is used in the mine and the more stony material (concrete, gypsum blocks) are used on their landfill (salt waste landfills, mining waste), then this is regarded as a disposal operation.

According to the Dutch National Waste Management plan (LAP2), a notification for export of waste destined for disposal on a landfill will be refused.

Export to a German **landfill** (f.i. Schermbeck: even when these wastes are used on top of the closed landfill (in Schicht 2) this is regarded as a disposal operation and not as a recovery operation. It could be the case that the German authorities regard this as recovery, but when the Dutch authority is of the opinion that it concerns disposal than the export can be refused.

In WSR: art. 12 under c. is applicable.

In our National plan, gypsum plasterboard is indicated as a waste that should be recovered as a material. It is obvious that using it on top of a landfill is a lower "treatment standard".

When export takes place of a single waste stream, for instance "clean" broken gypsum plasterboard, it is clear that the transport of a green listed waste takes place. However: one can only export green listed wastes without a notification when it is destined for recovery and not for disposal. So export for the Versatzverplichting is possible, but not to a salt waste landfill and not for a layer on top of a landfill. Moreover: one should verify: is broken gypsum plasterboard in practice used in a salt mine? Or diverted to the landfill on the premises of the mine through a sorting plant?

Best regards,

Kees den Herder

**Van:** Henrik Lund-Nielsen [mailto:hln@GipsRecycling.dk]

**Verzonden:** donderdag 3 juni 2010 23:05

22-06-2010

**Aan:** Kees den Herder  
**CC:** Martine Meijering  
**Onderwerp:** SV: Ban on export of plasterboard waste to Germany

Dear Mr. den Herder,

I refer your kind attention to my email below.  
I would really appreciate an answer, if you would be so kind.

Thank you in advance.

Best regards,

Henrik Lund-Nielsen

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**Fra:** Henrik Lund-Nielsen  
**Sendt:** 28. maj 2010 14:06  
**Til:** 'Kees.denHerder@minvrom.nl'  
**Cc:** Martine Meijering  
**Emne:** Ban on export of plasterboard waste to Germany

Dear Mr. den Herder,

Our Dutch Country Manager, Mrs. Martine Meijring was very happy yesterday to be able to report, that the VROM was going to ban export of plasterboard waste to Germany, if the plasterboard waste was destined to be used for cover purposes in German Kali Halden (salt waste mountains).

Obviously, we are very positive about this development and congratulate you with the work you have done to enable this to happen.

We are presently discussing the same issue with the Danish authorities, and I would therefore be very grateful if you could outline how the VROM is making this happen. In other words what regulations and rules and perhaps evaluations are being applied to assure that export to Kali Halden can be forbidden ?

I look very much forward to hearing back from you.

Best regards / Med venlig hilsen

**GYPSUM RECYCLING INTERNATIONAL A/S**  
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