



## **Eurits position paper – dilution and mixing**

Eurits believes that there should be a complete ban on the dilution of waste. Dilution of waste should not be used to circumvent environmental legislation or to avoid traceability since this is contrary to the precautionary principle. Dilution can be defined as the combination of a waste stream with products or other waste streams in order to allow a treatment method which is not the best option for the individual waste streams.

Eurits believes that there are sound environmental, legal and regulatory reasons for a ban on dilution. Both the Landfill Directive and the Waste Shipments Regulation prohibit the 'dilution of waste'; and we believe that this ban should be included in the revision of the Waste Framework Directive.

Eurits proposes that one or other of the following definitions should be used:

### **Option 1:**

*"The dilution of waste is the mixing (or blending) with other wastes or any other product, in order to change the characteristics and/or the concentration of certain contaminants which are present, so that the composition of the mixed waste complies with the criteria of a certain waste treatment method which is not permitted for one of the constituent waste streams. It is clear that mixing and blending, not with the aim of dilution, is a regular and accepted waste management pre-treatment option."*

### **Option 2 – based on the Flemish legislation:**

*"It is forbidden to mix a waste with one or more other materials with the aim of lowering the concentration of one or more components which are present in the waste, in order to:*

- *use a disposal method for the diluted waste which is not allowed for the non-diluted waste;*
- *recover the diluted waste in the case that the non-diluted waste should be disposed of;*
- *re-use the diluted waste as, or transform it into, a secondary raw material, if the non-diluted waste is not suitable for this purpose."*

### **Option 3 – based on the Swiss Technical Ordinance on Waste (Technische Verordnung über Abfälle), article 10:**

*"Holders of waste shall not mix it with other waste nor with additives if this is primarily intended to reduce the pollutant level of the waste by dilution, in order to meet regulations concerning supply, recovering or depositing."*

**The POPs example:** it is forbidden to mix, blend or dilute a persistent organic pollutant (POP) containing waste above the treatment threshold with a non-POP containing waste in order to lower the POP content of the diluted waste to below the threshold and to avoid the requirement to destroy or irreversibly transform the POP containing waste.

**Eurits  
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