

Waste Prevention Association "3R"
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Poland

MINISTRY OF
ENVIRONMENT AND ENERGY

MINISTER

J.no. M 1034-1153

Date

Dear Pawel Gluszynski,

Thank you for your kind letter dated April 15th addressed to the Danish Government and the Minister for Environment and Energy regarding Danish environmental support for waste management in Eastern Europe and Africa. I will respond to your letter on behalf of the Danish Government.

I fully agree with most of the points raised in your letter. To my understanding these points have to a large extent served as guiding principles for Danish environmental assistance in relation to waste management during the last decade.

I appreciate that the NGO's participate actively in the debate related to waste management, and especially the issue concerning disposal of obsolete pesticides.

Consequently, I regret that you and the other NGO's seem to have a different perception of our efforts. The vast majority of our assistance deals with waste planning, capacity building and investment - especially in relation to the establishment of new, safe landfills meeting EU requirements. A number of projects include waste minimisation, cleaner technology activities and recycling.

In spite of the high priority we give to waste minimisation and recycling, it has proven difficult to convince CEE countries to give higher priority to waste reduction and recycling due to the substantial cost of providing the needed infrastructure and of es-

establishing proper collection and recycling industries. As laid down in the revised strategy (2001-2006) for our DANCEE Programme, we will continue to follow and support the path of the EU waste hierarchy incorporating and giving priority to waste management solutions that includes capacity building and institutional strengthening activities prioritising waste minimisation and recycling.

Within the overall waste complex, hazardous chemicals require special attention. Not least the presence of more than 100,000 tonnes of obsolete pesticides in Eastern Europe presents a serious threat to human health and the environment in general. Therefore, realistic solutions concerning disposal of the already existing obsolete pesticides have been an urgent priority in our environmental assistance programme since 1991.

For some years the Ministry of Environment & Energy through Danish EPA has supported Poland, Ukraine, Belarus and the Baltic countries with information, mapping and collection of obsolete pesticides. Within the last years, public participation has become a required component of all such projects. But contrary to your letter, no obsolete pesticides have been incinerated though different options for disposal have been and still are discussed.

Results from a newly published report sponsored by DANCEE "Review on Obsolete Pesticides in Eastern and Central Europe" indicate that some of the alternative technologies for disposal of chemicals, such as gas-phase chemical reduction and solvated electron process, are applicable. However, these methods have yet to be tested on the mixtures of obsolete pesticides that are present in Eastern Europe. Unfortunately, these methods reported seem prohibitively expensive in a CEEC setting for some time to come.

However, based on this report, we have decided not to give further support to incineration in cement kilns. This is due to new information on organisational and security problems.

We remain committed to find realistic solutions to the obsolete pesticide problem in CEEC fulfilling all EU criteria. Furthermore, we will support guidelines for national action plans in line with the forthcoming POP Convention. We have already initiated this work in co-operation with the World Bank.

Finally, I fully agree with you that more focus should be given to the development of non-incineration technologies in relation to POP's and other hazardous chemicals.

Best regards,

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