



The Recycling Association

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Mr. Achmad Gunawan W.
Director for Verification of Hazardous and
Non Hazardous Waste
Directorate General of Solid Waste, Hazardous Waste
and Hazardous Substances Management
Ministry of Environment and Forestry
Republic of Indonesia

7th August 2019

Dear Director Gunawan

Imports of Secondary Raw Materials

The Recycling Association represent many of the major producers and exporters of recovered paper and plastics in the UK. Our members have a combined turnover in excess of £5 billion.

We share the concerns of the Indonesian government relating to the importing of sub-standard consignments which may contain materials difficult to manage within your current waste management infrastructure. Indeed, we have campaigned rigorously through our high-profile Quality First campaign (attached) to eliminate this from the UK. We have also, for example, successfully partnered with CCIC in the UK to develop a Quality Management system which has resulted in the exporting of very clean materials which meet new Chinese government specifications (attached). We also work closely with our friends at ISRI in the US to share best practice and to work towards sustainable solutions. It is within this background that I write to appeal to the Indonesian government to find practical solutions to facilitate the importing of high quality secondary raw materials into your country which has tangible environmental and economic benefits for all parties. The UK are 60% net exporters of fibre and Indonesia are 50% net importers of fibre and if this trading stops, it will have a significant impact on the sustainable economies of both countries.

Hopefully you will concur with our insights, that illegal exporting represents a small proportion of the overall materials your country receives from the UK and we absolutely support you in trying to combat this malpractice with strict importing criteria. However, we firmly believe that these criteria must be workable for all parties. This is because it is impossible, given current processing technologies, to achieve 0%. We are working very hard to achieve de minimis contamination levels, but it is impossible, with current technology, to eliminate all non-target materials. Indeed, we must also distinguish between non-target materials such as non-specified fibre and other inert materials, with materials containing prohibitives which may be hazardous, and which should never appear in a consignment of recyclables.

Accordingly, the recently announced 0% contamination policy for imports of recyclables is unworkable and, if implemented, will stop all legitimate trading of valuable secondary commodities to the detriment of both countries.

We believe that the trading of secondary commodities is a shared responsibility. It is the responsibility of the UK to supply materials of the highest quality to Indonesia and it is the responsibility of our respective governments to regulate this and to develop workable standards.

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The key phrase though is “workable standards” and we believe the standards contained in the ISRI Specification meet both paper-making and environmental standards. We would totally support the rejections of any materials outside of these specifications by KSO-Suconfindos’ agents around the world.

We thus appeal to the Indonesian government to work with the UK to find practical solutions to combat your environmental concerns. We also hope that you will look at the work we have undertaken via our Quality First campaign and with CCIC China to produce top quality raw materials for export. Indeed, China has recently announced that they are receptive to a more flexible deadline on their plans to ban the importing of some secondary raw materials. We truly hope we can find some common grounds to work within to continue our successful partnership in the trading of secondary commodities.

I am available with our President to travel to Jakarta to discuss these issues in more detail and we would welcome any partnerships we could form with yourselves and other forward-thinking associations such as ISRI to find workable solutions.

I look forward to hearing from you.

Yours sincerely

Dr Simon Ellin
CEO

