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ash history

**has been the main product – pottash
waste legislation designed to cope with
linear flow
recycling sustainable system**

ash in a sustainable society

**ash has been a waste
once ash was the product
end of waste criteria
when is ash a hazardous waste
ash a tool in sustainable ecocycle**

generic definition of waste

”substance or objects which the holder discards or intends or is required to discard”

relevant when ash is the vector for intended and essential nutrient recycling?

2 examples from today's EU this week

calcium and potassium is essential for soil – keep the “ash” by refraining from bioenergy

ash is hazardous waste – calcium and potassium

informal consultation sustainability solid biofuels

**extraction of biomass depletes Ca and K
in the soil – restrict the amount of
biomass harvested!**

**recycle the ash or compensate as
appropriate!**

generic linking waste legislation to legislation regarding chemical substances

**mechanistic formula for any
combination of waste in the waste list
to any chemical substance (700+ page
list)**

15 risk categories

wood ash irritating via pH Ca and K

proposed formula alternatives for MS consultation ending today

$10X(cCa+cK)>10\%$ hazardous

$4x(cCa+cK)>20\%$ hazardous

**both alternatives means all ash is
hazardous**

exemption for Ca if the only critical component

**K content enough to make the ash
hazardous**

pure biomass ash hazardous waste - proportional?

**classification as hazardous waste –
dewatering the concept of hazardous
waste?**

conclusion

**ash is on the agenda
programme relevant for todays poluicy
issues**

Thank You