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Dear [REDACTED]

Having briefly reviewed the relevant regulatory documentation on the crushing of waste fluorescent tubes on non-permitted sites, we suggest that there is a potential for uncontrolled mercury emissions to air, soil and water. This would arise from interaction with this waste prior to its direct input into an exempted crushing operation. This conclusion is based on a high probability of an abuse of the environment, from high emissions and pollution, due to the nature of the fragmented mercury-bearing waste sources being handled, decanted and transported at 'collection/producer sites' which are not designed to contain/control this form of hazardous waste.

The Centre for Waste Management has carried out research on the mobility of mercury when processing flat panel displays. We would therefore recommend that the EU waste framework 'precautionary principle' should be applied. This should be the position until demonstrably proven otherwise by the operators and regulators. There is also evidence of data on the performance of the mobile lamp crushers by other studies, but this would form part of a larger review study for your commissioning consideration. This would provide overview evidence and would help to inform the question around the environmental impacts from the mobile crushing of lamps on exempt sites. It may also be pertinent to review the environmental impacts on an exempt site where mobile crushers would operate; such a site would not have the same infrastructure or controls as a permitted site.

This is the current position of the Centre of Waste Management at UCL on this topic.

Yours sincerely

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