

10 February 2022, Brussels

## FEAD Overview of submitted feedback to the WSR revision

Association	General Feedback	Shipments/Exports	Other aspects
Portuguese Plastics Industry Association ( <a href="#">APIP</a> )	<b>Simplify and reduce burdens</b> linked to its implementation (less bureaucratic, less time-consuming).	Transboundary shipments should become swifter and constraint by less administrative burdens.  Exports: installations in third countries themselves carried out this audit (internationally recognized) and were registered on a European usage basis and available to all.	<ul style="list-style-type: none"> <li>- More materials should be covered by the end of waste criteria.</li> <li>- Non-hazardous materials resulting from industrial processes that are currently classified as waste, should be classified as by-products to facilitate their management, with proven destination and recycling/reuse process for them.</li> </ul>
<a href="#">Zero Waste Alliance Ireland</a>	Procedures are burdensome and are inconsistently implemented by the Member States	<ul style="list-style-type: none"> <li>- Any shipment of waste must be controlled and regulated specifically to severely limit or eliminate greenhouse gas emissions, either as a consequence of waste processing or transportation</li> <li>- Transport of waste between Member States, and export of waste to non-EU countries, also conflicts with the Proximity Principle</li> <li>- Stronger reasons for objecting to shipments of waste destined for “recovery”</li> <li>- EU must stop exporting waste</li> </ul>	<ul style="list-style-type: none"> <li>- WtE is highly inefficient and polluting</li> <li>- Welcome public access to notifications</li> </ul>

<a href="#">Eurima</a> (European Insulation Manufacturers Association)			<ul style="list-style-type: none"> <li>- Set clear rules on the <b>fast-track permits</b> for materials destined for recovery</li> <li>- Create a <b>database of certified/permitted recycling plants</b> for the operations of recyclable materials</li> <li>- Support the development of <b>recycling projects with pilot phase</b> through a temporary (pro-rata of a defined pilot phase plan) minimized procedure for cross border transportation of waste. The principle would be that this is only valid for a limited quantity and time period; both to be defined in advance.</li> </ul>
<a href="#">Minderoo Foundation</a>		<ul style="list-style-type: none"> <li>- Export bans create opportunities for a circular economy by facilitating access to secondary raw materials for recycling.</li> <li>- WSR leaves room for EU countries to ship certain waste (including mixed plastics) within the EU and to OECD countries for recovery, and without guarantee that the importing country has the capacity to safely manage the imported waste.</li> <li>- Distinguish between the shipment of materials for recycling and cheaper, lower-quality alternative recovery methods → <b>inclusion of a notification procedure that applies to shipments destined for energy recovery.</b></li> </ul>	
<a href="#">ITAD</a> , German Association of Waste-to-Energy Plants		The EU has the capacity to treat its own waste in the best way possible. ITAD also <b>welcomes the ban on intra-EU shipments for disposal</b> , in	Suggests moving <b>forward from a national to a European waste management approach</b> : interpret the proximity principle for shipments

		order to optimally retrieve secondary raw materials.	destined for recovery (Art. 12 1.a WSR; 16 WFD) following life cycle thinking.
<a href="#">EUROSHORE INTERNATIONAL</a>	<ul style="list-style-type: none"> <li>- Building a real European market for the treatment of waste is a key element for an effective and efficient secondary raw material market, i.e. a circular economy.</li> <li>- The timing of the implementation of the revision needs to be closely aligned with new measures to stimulate the secondary raw material market.</li> </ul>		<ul style="list-style-type: none"> <li>- The shift to digital solutions to speed up procedures and fast-track procedures will contribute to facilitate the circular economy.</li> <li>- Would like the acceptance of files by email and under pdf format by competent authorities to be explicitly mentioned.</li> <li>- Differentiation between renewals of notifications and new notifications</li> <li>- For lab testing and trials at least 1IBC (i.e. 1 tn or 1 m3) would be necessary</li> <li>- European standard contract</li> <li>- A (relative) maximum amount for the financial guarantee should be mentioned</li> <li>- No deadline but asap in 8.2</li> <li>- 90 days instead of 30 in 11.3</li> <li>- 12.1.b only for national waste management plans</li> <li>- introducing the possibility of pre consented for the notifier- waste producer as well</li> </ul>
<a href="#">A3M</a>		<ul style="list-style-type: none"> <li>- Art. 42 mechanism should be strengthened, and in particular should not be conditional on an increase in export volumes</li> <li>- The scope of the audits should be defined with greater clarity and a sufficient level of detail. All actors involved in the different stages of treatment should be audited</li> </ul>	<ul style="list-style-type: none"> <li>- Transition period too long</li> </ul>

Spanish Federation of Recovery and Recycling ( <a href="#">FER</a> )		<ul style="list-style-type: none"> <li>- Export measures must be focused only on lower quality waste streams</li> <li>- <b>Replacing Articles 38 – 40 and Annex VIII with the written request procedure</b>, like that already implemented in Regulation 1418/2007. This system would ensure that third country sovereignty is preserved.</li> <li>- <b>Impose the application of EU law in third countries for audits is an encroachment. The audits should focus more directly on environmental and proper treatment assurances.</b></li> <li>- 5 years records issue for new facilities</li> <li>- Elaborate in greater detail what is required to achieve an international agreement under 43.8</li> <li>- Reciprocity: identical obligations of an auditing requirement on importers of waste into the Union. Drive demand for RMR towards non-EU imports, which would have reduced costs compared to the EU materials.</li> <li>- <b>Annex VII once the waste has arrived at its destination</b></li> </ul>	<ul style="list-style-type: none"> <li>- Regional “multilateral agreements” under Art. 30</li> <li>- 5 tonne shipments should be allowed without notification to test pilot projects</li> <li>- Limit revocation of pre-consent to violation of Art. 14.6 or illegal activities. Specific condition proposed</li> <li>- EU EDI that electronic submissions in a pdf format (via email) is allowed</li> <li>- Mutual recognition of national EoW criteria</li> <li>- No penalties for adm mistakes</li> </ul>
<a href="#">Eurometaux</a>		<ul style="list-style-type: none"> <li>- Intra-EU shipments – Simplify and slim down the rules as much as possible. Strengthen the status of preconsented facilities to achieve an effective fast-track procedure.. <ul style="list-style-type: none"> <li>o 1 day in Art. 18 too short</li> </ul> </li> <li>- Extra-EU shipments – Optimise the rules to secure the level playing field for European recyclers and enforce that waste sent for treatment outside the EU is treated according to the Environmentally Sound Management conditions, provenly equivalent to the EU ones.</li> <li>- Import of waste to the EU – Facilitate conditions for importing waste, in particular</li> </ul>	<ul style="list-style-type: none"> <li>- Effectively implement the EU electronic system for the exchange of documents and waste flow documentation with the lowest possible additional bureaucracy for intra-EU shipments</li> <li>- Increase threshold of Art 4(4) to 2 t</li> </ul>

		spent batteries and WEEE for recycling in the EU.	
<a href="#">Zero Waste France</a>		La hiérarchie des modes de traitement des déchets est insuffisamment intégrée dans la proposition. Il serait opportun de fixer des conditions minimales ainsi qu'une <b>procédure de notification pour pouvoir exporter des déchets vers une filière de "valorisation énergétique"</b> .	Exclure PVC ou le PTFE de la liste verte de l'UE.  Les amendements des annexes II, VIII et IX de la Convention de Bâle en vigueur depuis le 1er janvier 2021 doivent par ailleurs être mieux intégrés au texte puisqu'ils élargissent notamment le champ des déchets plastiques soumis à la procédure de notification de la convention.
<a href="#">Municipal Waste Europe</a>		Fully supports the use of a prior written notification and consent procedure for the shipment of waste for recovery to be understood as including energy recovery with the purpose of increasing traceability and reducing illegalities. No issue with the ban on shipments of mixed waste for disposal with the exception of any border region agreements, so long as it is made abundantly clear that this does not apply to shipments of mixed waste for recovery.  There are established routes for the legal treatment of non-recyclable residual waste for which there is no treatment capacity in the country of origin. Propose to introduce more monitoring and traceability measures to ensure that this waste actually ends up in the destined waste to energy plant and is not illegally dumped. This can be achieved through certification of the destination facilities, their pre-notification in the digital system and through the communication of a certificate of treatment to the dispatcher	

European Waste Oil Re-Refining Industry Association ( <a href="#">GEIR</a> )		The proposal misses a distinction between shipments for recycling and regeneration of waste oils, and shipments for energy recovery.	
Non-packaging plastics products' association for agriculture ( <a href="#">APE</a> )			Requests that used plastics for agriculture intended for recycling be explicitly mentioned in the mixtures of waste included in Annex IIIA point 4.a.
<a href="#">EuRic</a>	Same as FER above		
<a href="#">Citeo</a> , French company in charge of the Extended Producer Responsibility for household packaging and graphic papers		Fully supports banning exports of green-listed non-hazardous waste to non-OECD members as well as the list and audit procedure proposed.	
European Network of Social Integration Enterprises - <a href="#">ENSIE</a>		Focus on the implementation of the waste hierarchy. The Commission's proposal currently fails to differentiate between export for recycling and export for preparing for re-use. In addition, there is no foreseen system ensuring Member States favour local re-use over export for recycling. A stronger implementation of the proximity principle should be investigated in that regard.	These minimum requirements could be met when used goods:  1. Have gone through a monitored sorting process separating what is reusable from what will be recovered in another way, 2. Are in a state similar to used goods sold locally, unless the buyer is informed (meaning no holes, no stains, no defects, etc.) and 3. Are safe for use.
<a href="#">EuroCommerce</a>	Great opportunity for the EU to create a real internal market for waste.		<ul style="list-style-type: none"> <li>- Footwear waste should be added to Annexes III and III.a</li> <li>- Prevent that textile waste is exported for reuse but ends up in landfills in third countries and hampers recycling in the EU.</li> <li>- Until EoW criteria for textiles are adopted, recycled textile fibers destined for the manufacturing of new products should not be</li> </ul>

			considered waste. This must be regulated in the upcoming revision of the WFD.
Bundesverband der Deutschen Industrie ( <a href="#">BDI</a> )	Ziel muss es sein, den europäischen Binnenmarkt unter der Wahrung von hohen ökologischen Standards für den Einsatz von Sekundärrohstoffen zu ertüchtigen und gleichzeitig angemessene Regelungen mit einem ebenfalls hohen ökologischen Schutzniveau auch für den Transport und den Handel mit Abfällen in Drittstaaten zu schaffen.	ökologischer "Level-Playing-Field": Die Anforderungen an den Abfallerzeuger in Bezug auf den neu geforderten Nachweis einer umweltgerechten Behandlung durch einen Nicht-EU-Entsorger müssen daher verhältnismäßig und praktikabel sein.	
European Tyre and Rubber Manufacturers' Association ( <a href="#">ETRMA</a> )		The stricter application of the waste treatment allowance at destination will increase the health and environment protection in non-OECD countries while it also should not block completely current and short-term solutions and also promotes the development of new applications in the EU.	Implementing easier and faster procedures for updating the EWC, the Basel Code and the Tariff Code is paramount.  Good green public procurement could foster the development of road infrastructures with a high positive impact.
<a href="#">Rethink Plastic alliance</a>	It does not provide a sufficient framework to end the environmental and health implications resulting from the EU waste trade and may likely result in the creation of loopholes exploited by criminals.	Suggestions: <ul style="list-style-type: none"> <li>- Fully transpose the BC internally</li> <li>- Require Prior Informed Consent for all shipments for intra-European plastic waste trade shipments, including green-listed waste</li> <li>- Establish a clear distinction between mechanical recycling and other types of recovery, with only shipments destined for mechanical recycling being green listed;</li> <li>- Exclude PVC and PTFE from the EU3011 entry within current Commission Guidelines</li> <li>- Provide publicly accessible waste trade data</li> </ul>	

<a href="#">Eurits</a> (the European Union for the Responsible Incineration and Treatment of Special waste)		Major concerns about the revised Articles 4 and 11. Proposes specific exemption from the general prohibition of shipments for disposal in Art 4(1) for shipments for the incineration of nonrecyclable hazardous waste. POP waste to be listed under 4(2).	
<a href="#">DIGITALEUROPE</a>	<ul style="list-style-type: none"> <li>- Notification procedures could be accelerated.</li> <li>- Cleaner fast-track procedure in the WSR would facilitate the Circular Economy.</li> <li>- Increased focus on enabling shipment for repair, refurbishment, remanufacturing and collection of waste would be central for a real Circular Economy.</li> <li>- Bans are not the most proportionate policy instrument to tackle environmental protection as circular economy supply chains are global.</li> </ul>	<ul style="list-style-type: none"> <li>- “recovery facility” should be defined in as broad terms as possible.</li> <li>- Art. 4 should have clarified that small volume take-back and trade-in activities for waste collection from households are exempted from shipment requirements.</li> <li>- Further tightened restrictions on waste shipments may impact emerging global circular economy supply chains, especially regarding non-hazardous waste.</li> </ul>	
<a href="#">MOL Group</a>		<ul style="list-style-type: none"> <li>- The combination of Art 4(2)(c) and Annex IIIA (4) appears to limit the use of code EU3011 to waste consisting of a combination of wastes that each formerly consisted almost exclusively of single, specified polymer.</li> <li>- Mixtures of plastic wastes as specified under 4.) in Annex IIIA that are destined for recycling should be subject to the general information requirements only.</li> </ul>	<ul style="list-style-type: none"> <li>- Setting too ambitious contamination levels could mean that even the plastic waste that is currently on the “green list” might be considered as too contaminated and be moved to the “amber list”.</li> </ul>
Plastics Recyclers Europe ( <a href="#">PRE</a> )		<ul style="list-style-type: none"> <li>- Support Annex X criteria, but EC should be able to amend it</li> </ul>	<ul style="list-style-type: none"> <li>- Increase threshold of 4(4) to 1000 – 1500 kg.</li> <li>- Establish a certain time period (e.g. 5 years) regarding the</li> </ul>



			<p>absence of violations for objections under 12(f)</p> <ul style="list-style-type: none"> <li>- See new pre-consented status not just an administrative benefit, but an implicit acknowledgement that the recycler in question is ensuring a high quality treatment.</li> <li>- New Art 18 additional adm burden but they support it.</li> </ul>
<a href="#">RREUSE</a>	Same as ENSIE above.		
<a href="#">Euromines</a>			<ul style="list-style-type: none"> <li>- Higher thresholds for 4(4)</li> <li>- The proposal that defines thresholds for classifications of waste should be discussed together with the relevant industries</li> <li>- Suggest that the general notification according to Article 13 should be extended to 5 years</li> </ul>
<a href="#">Bureau of International Recycling</a>	Wastes (recyclables) need unhindered access to their respective markets, to facilities operated in an environmentally sound manner.		
<a href="#">Cepi</a>		<ul style="list-style-type: none"> <li>- “Environmentally sound management” is vague at large and fails to provide the necessary guidance and clear requirements to ensure its effectiveness. Further clarification and guidance are needed to ensure that conditions in the country of destination follow a similar level of protection of human health and the environment, as provided in Union legislation.</li> <li>- Similar requirements should also be imposed on exports to OECD countries (non-EU)</li> </ul>	<ul style="list-style-type: none"> <li>- Supports the proposed text under Article 28</li> </ul>

		<ul style="list-style-type: none"> <li>- In the event of an application of an End-of-Waste status for Paper for Recycling, this should not exempt EU exporting companies from their obligation to ensure the sustainability of their exports</li> <li>- The additional element included in Annex VII welcomed.</li> </ul>	
Advanced waste treatment facilities, <a href="#">EEW</a> and <a href="#">AVR</a>	Same as ITAD above		
<a href="#">Technology Industries of Finland</a>	We welcome the stronger regime proposed. It is important that waste can be shipped to third countries only if it can be shown that the waste treatment in these countries meets the same environmental, health and social conditions as required in the EU. Those conditions should also be reliably verified. It is important to ensure that the proposed measures are implementable, effective, and that no risks of fraud or circumvention arise. The fundamental principle of environmentally sound management should apply effectively to all waste exports and to all destination countries.	The proposed amendments, as currently presented, may not facilitate the shipment of waste for treatment within the EU in licensed and environmentally sound treatment facilities.	
<a href="#">Cefic</a>		<ul style="list-style-type: none"> <li>- Unclear how Art 43 will be implemented <ul style="list-style-type: none"> <li>o No ESM standard for facilities to be assessed against. ISO appropriate</li> <li>o Audit should not be required for each exporter/notifier</li> <li>o The EU should consider the establishment of a central register of audited facilities</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Transitional rules for the EU Electronic Data Interchange (EDI) system (accept pdf)</li> <li>- A pre-consent issued by one MS must be recognized by all other MS</li> <li>- Propose the complete removal of the requirement to pre-notify movement of waste (Art 16(2)).</li> </ul>

		<ul style="list-style-type: none"> <li>- Combination of Art 4(2)(c) and Annex IIIA (4) appears to limit the use of code EU3011 to waste consisting of a combination of wastes that each formerly consisted almost exclusively of single, specified polymer.</li> <li>- Mixtures of plastic wastes as specified under 4.) in Annex IIIA that are destined for recycling should be subject to the general information requirements only</li> </ul>	<ul style="list-style-type: none"> <li>- EN doc to be accepted by all authorities.</li> <li>- Supports Art 21 as proposed</li> <li>- Only the competent authorities for dispatch and destination should agree on the amount of waste for lab analysis and treatment trials.</li> <li>- Too ambitious contamination levels could mean that even the plastic waste that is currently on the “green list” might be considered as too contaminated and be moved to the “amber list”.</li> </ul>
<a href="#">Refuse Derived Fuel Industry Group</a>		Fully supports the proposal to prohibit the shipment of wastes destined for disposal, both within and outside the EU, except for in some specific circumstances	
<a href="#">European aluminium industry</a>		<ul style="list-style-type: none"> <li>- 1 day deadlines too short</li> <li>- 7 year should also be extended to general notifications</li> </ul>	<ul style="list-style-type: none"> <li>- Support addition of new Green List codes</li> <li>- up to 5 t for pilot/demo applications in case of non-hazardous wastes in Art 4(4)</li> </ul>
<a href="#">Bundesverband Sekundärrohstoffe und Entsorgung e.V.</a>		<ul style="list-style-type: none"> <li>- Making export more difficult is the wrong way to promote the use of raw materials from recycling within the EU. Better market-based incentives.</li> <li>- Better distinguish between hazardous and non-hazardous treated waste</li> <li>- Annex X No. 2 amended or deleted</li> <li>- In Europe, it should be possible to treat waste where it makes the most economic and ecological sense.</li> <li>- Art. 18 to be improved to avoid extra burdens</li> </ul>	<ul style="list-style-type: none"> <li>- Financial guarantees are not released soon enough. They propose insurance-based schemes</li> <li>- Article 14 (7) and Article 14 (10) are problematic. Propose to delete par. 7 and propose specific grounds for revocation under par. 10.</li> <li>- Transition period of 5 years before full implementation of electronic system in Art. 26</li> </ul>

			<ul style="list-style-type: none"> <li>- Mutual recognition of EoW criteria</li> <li>- introduction of further "contamination thresholds" is counterproductive</li> <li>- B3030 "Textile waste" to be supplemented or concretised</li> <li>- No penalties for adm errors.</li> </ul>
<a href="#">BDSV - Bundesvereinigung Deutscher Stahlrecycling- und Entsorgungsunternehmen e.V.</a>	<p>Differentiating between high-value Raw Materials from Recycling and unprocessed waste</p> <p>Implementation of a <a href="#">scrap bonus</a></p>	-	<ul style="list-style-type: none"> <li>- Increase 4(4) to 1 t</li> </ul>
<a href="#">POLYECO S.A.</a>		<ul style="list-style-type: none"> <li>- 7 days deadline in Art. 8 too strict</li> <li>- Increase 11(3) to 90 days</li> <li>- alternative routing should be possible in the notification file</li> <li>- Propose renewal notifications with consent in 15 days</li> <li>- Propose list of pre-consented "Notifiers"</li> <li>- One day confirmation deadlines too tight</li> <li>- 20% in the shipped quantity to be allowed for every notification file</li> </ul>	<ul style="list-style-type: none"> <li>- All authorities to accept official translations in English</li> </ul>
<a href="#">FEDERACCIAI</a>	Significant improvements are necessary to ensure that the proposed measures are implementable, effective, and that no risks of fraud or circumvention arise	<ul style="list-style-type: none"> <li>- Country level and at the facility-level must remain as the default requirement for relevant exports to all destination countries (also OECD)</li> <li>- Define scope of audits and they should be carried out by an EU-based entity</li> <li>- 3 years transition period too long</li> </ul>	
<a href="#">NRK Recycling</a>		<ul style="list-style-type: none"> <li>- One day confirmation deadlines too short</li> <li>- No legal basis for the receiving facility to make mandatory use of Annex VII to confirm receipt of the waste and to declare that recovery has been completed</li> <li>- EU database for audited installations</li> </ul>	<ul style="list-style-type: none"> <li>- Mutual recognition of EoW</li> </ul>

<a href="#">EUROFER</a>	Same as FEDERACCIAL above		
<a href="#">EERA</a> (“NSRR Fast Track” working group)		Renewal of the pre-consent a condition after the 4th year of the validity. Clearly define conditions for revocation.	<ul style="list-style-type: none"> <li>- Correspondence should always be possible in EN</li> <li>- Transitional measures to be implemented under Art 26</li> <li>- Welcomes clear guidance on the classification of waste and would like reducing the number coding systems for shipments of recyclable wastes particularly to preconsented treatment facilities</li> <li>- No financial guarantee for preconsented facilities or alternatively use a (European) fund.</li> </ul>
<a href="#">Wirtschaftsvereinigung Stahl</a>		<ul style="list-style-type: none"> <li>- No waste permit should be required to submit a notification (Art 5(1))</li> <li>- Extend tacit consent</li> <li>- Same entry and exit points in Art 13 inappropriate</li> <li>- General notification should also be extended to 7 years</li> <li>- Support list of countries, Art. 42 and audits. Scope of audits should be specified.</li> </ul>	<ul style="list-style-type: none"> <li>- Increase 4(4) to 1 t.</li> <li>- Financial guarantee should not be harmonised according to the highest level</li> <li>- Keep 3 days confirmation deadlines</li> <li>- No publication of rejected notifications under Art 21</li> <li>- Contamination thresholds should only be defined for specific cases where it is useful</li> </ul>
<a href="#">NABU</a>		<ul style="list-style-type: none"> <li>- Extend export rules to all countries outside EU in case of plastics</li> <li>- Not only more controls but also clear information obligations and transparent information systems are needed to address the problem of illegal shipments.</li> </ul>	
<a href="#">Eramet</a>	Wishes a real export ban of end-of-life Li-ion batteries – and related production scraps -, at least for the period of time required to develop		

	this industry in a sustainable way in Europe.		
<a href="#">APK AG</a>			<ul style="list-style-type: none"> <li>- Clarification regarding which of the competent authorities should agree on the amount of waste to be shipped for experimental treatment trials (Art 4b).</li> <li>- The opportunity to have additional waste streams 'green listed' should be included, if the recipient is a recycling process which is able to valorise them into recyclates of sufficient quality.</li> <li>- Suggest phase wise approach to introduce increasingly stricter contamination limits</li> </ul>
<a href="#">EUROBAT</a>	Facilitating the imports of spent batteries into the EU for recycling should be a key provision of this Regulation		
<a href="#">Swedish Iron and Metal Scrap Traders' Association</a>	Strongly support measures aimed at limiting the export of unprocessed waste, but the vast majority of waste streams fails to distinguish between unprocessed waste and secondary raw materials that meet quality specifications		<ul style="list-style-type: none"> <li>- Set higher demands on manufacturing industries to use more secondary raw material.</li> <li>- Separate secondary raw materials from waste - create a regulatory framework for the recycling of iron and metal as the environmental benefits promote the circular economy.</li> <li>- Maintain free trade within' and outside the EU to achieve global environmental goals.</li> </ul>
<a href="#">Confederation of Danish Industry (DI) and Waste and Resource Industry</a>		<ul style="list-style-type: none"> <li>- Recommend a very descriptive guide clarifying the requirements for the execution and content of the audit</li> </ul>	<ul style="list-style-type: none"> <li>- Under 5(2) all three signature options should be valid</li> </ul>

		<ul style="list-style-type: none"> <li>- Export of waste is not the same as the export of waste problems.</li> <li>- It is imperative that the lists of approved countries and factions, are in place by the end of the 3-year transition period.</li> </ul>	<ul style="list-style-type: none"> <li>- Encourage disclosing information on approved notifications as much as possible without compromising the confidentiality of business secrets</li> </ul>
<a href="#">Steinert GmbH</a>			Increase 4(4) to 2 t.
<a href="#">VCI</a> - German Chemical Industry Association		<ul style="list-style-type: none"> <li>- An intra-EU transboundary shipment of waste destined for disposal must remain possible.</li> <li>- Central EU-register of all facilities that have been audited</li> <li>- More specific guidelines or templates for Annex II Part 3</li> </ul>	<ul style="list-style-type: none"> <li>- Increase 4(4) to 1 t.</li> <li>- Faster implementation of 7(10)</li> <li>- Complete abandonment of the prior information under Art. 16 would be helpful</li> <li>- Transitional rules for the implementation of Art. 26</li> <li>- Documents to be accepted in EN</li> </ul>
<a href="#">Plastics Europe</a>		<ul style="list-style-type: none"> <li>- More proportionate distinct Prior Informed Consent (PIC) 'light' procedure for non-hazardous mixed plastic wastes (EU48) destined for recycling in pre-consented facilities</li> <li>- Clarification on audit procedure (standard, availability of results)</li> </ul>	<ul style="list-style-type: none"> <li>- Does not support the inclusion of end of waste criteria, waste hierarchy or waste classification in the WSR.</li> </ul>
<a href="#">Belgian Waste to Energy</a>		<p>Since it is no longer stated that shipments of MMW must meet the same conditions as shipments for waste destined for disposal, the objections that may be used for export to disposal can no longer be applied for shipments of MMW. Only the conditions listed in art. 12 of the revised WSR can be used</p> <p>This amounts to a weakening of the current legislation, which may not have been the intention. <b>We ask that the revision of the WSR reinstate the fact that transport of MMW remains considered transport for disposal.</b></p>	

<a href="#">A.D.I.VALOR</a>		Concerns about the possibility of establishing correspondences between the waste codes of the European regulation and the Basel Convention. A waste code may correspond to two different Basel Convention codes depending on the level of contaminants observed.	<ul style="list-style-type: none"> <li>- Financial guarantee per notifier and not per notification</li> <li>- Deadlines back to 3 days, which should be working days</li> </ul>
<a href="#">Fenix Metals Sp. z o.o.</a>		<ul style="list-style-type: none"> <li>- Allow modifications in the document the day of the shipment (Art 18)</li> </ul>	<ul style="list-style-type: none"> <li>- Back to 3 days deadlines</li> <li>- Address and name of the supplier and the waste generator should not be published</li> <li>- Possibility to submit document in EN</li> <li>- complete the list of waste codes in Annex V so that it corresponds to the EWC waste list</li> </ul>
<a href="#">VKU</a>	The revision should not result in preventing or significantly impeding transboundary shipments of waste for recovery in R1 facilities, including in countries outside the EU, such as Switzerland.		
<a href="#">EEB</a>		<ul style="list-style-type: none"> <li>- Shipments not conditioned enough for OECD (evidence that receiving country is already managing its own domestic waste)</li> <li>- Poor transposition of Basel amendments on plastic within EU (notification for all Y48)</li> <li>- No clear governance on EC decision</li> </ul>	<ul style="list-style-type: none"> <li>- Too weak alignment with waste hierarchy (no distinction recycling and energy recovery)</li> <li>- Neglected end of life of items shipped for reuse</li> </ul>