

SAFE AND EFFICIENT WASTE SHIPMENTS

FOR A RESOURCE EFFICIENT
AND CIRCULAR ECONOMY

Procedural burdens and delays, with associated costs in the cross-border transportation of end-of-life products need to be addressed with clear and efficient waste shipment rules.

- Financial guarantees are burdensome and costly, while they are also blocking possible investments, whereas such guarantees are hardly ever executed. Risk-based approaches and alternative, less burdensome systems should be explored. Financial guarantees should not be required for 'green-listed' waste shipments.
- Introducing an interoperable electronic notification procedure will increase the speed, efficiency transparency and traceability of the notification procedures. However, there is a need for a paperless solution also in the transition period until the implementation of such electronic submission and exchange system is completed.



- All authorities should accept documentation in English to facilitate and streamline shipment procedures in an international environment.
- The general information procedure for 'green-listed' waste should continue to allow for modifications on the same day of the shipping.
- The confirmation deadline for the receiving facility should remain at three days and not be reduced to one day.
- The pre-consent procedure needs to be improved to become a real swift path to develop the circular economy in the EU. It is essential that the pre-consent status is recognised by all competent authorities.

A patchwork of different definitions and classification of end-of-life products between countries creates uncertainty for cross-border circular business transactions:

- There is a need for a harmonised understanding of what is considered as 'green-listed' waste.
- Strong harmonised end-of-waste criteria and criteria to distinguish used goods and waste are needed. As long as those are under development, authorities should mutually recognise their national criteria.



Trade restrictive measures including import and export restrictions hamper circular economy models:

- The requirements foreseen for the list of non-OECD countries to receive waste is extreme administrative burden for all parties and could have a disproportionately deterrent effect. Instead, sound environmental management, transparency, and traceability can be equally and sufficiently ensured through the proposed audit procedure.
- There is a need for a waste-stream specific approach in the exports regime that differentiates 'problematic' and 'non-problematic' waste streams.
- The new and strict rules on plastic waste exports introduced by BC COP14 should be strictly implemented before there is any thought about a full export ban.
- Enforced possibilities for multilateral agreements between EU/EEA countries in the same geographical vicinity, would allow to further share administrative and infrastructural burden.



Illegal waste trade distorts competition in the recycling industry

- Appropriate enforcement measures are needed.
- Better controls, traceability and cooperation among Member States are essential, but also strong harmonised end-of-waste criteria and criteria to distinguish between used goods and waste.



Eco-design is crucial for products to be better utilised at their end-of-life through recycling.

- Ecodesign requirements should determine as much as possible mandatory recycled content, whereas eco-labelling schemes and green public procurement should further incentivise the demand for products with recycled content.

