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FEAD feedback on the draft certificate to confirm the completion of a subsequent interim or non-interim recovery or disposal treatment operation according to Art. 15(5) WSR

FEAD thanks the Commission for the quick preparation of the draft Delegated Regulation to the new Waste Shipment Regulation, which determines the information to be provided in the certificate confirming the completion of a subsequent interim or non-interim recovery or disposal operation according to Art. 15(5) WSR. **FEAD notes the following points:**

1. Such certifications will be an enormous administrative burden for operators if foreseen to be completed for each shipment. One must imagine the amount of paperwork for treating, for example, e-waste from which 10 or 20 different fractions, iron, aluminium, copper, plastics, boards, brass, etc., are recovered.
 - **It must be clarified that the certification can cover more than one shipment** as box 2 seems to indicate. For this, more than one date needs to be allowed in box 5 (on quantities received).
2. The amount of recovered or disposed waste can be difficult to identify because facilities are receiving waste from different sources and no plant treats waste in single/differentiated batches or lots accordingly.
 - **It must be clarified how/based on what data the information requested in box 7 (quantities treated) is to be provided** (e.g., an estimation or an average rate).

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 19 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

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