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## **BOOSTING THE CIRCULAR ECONOMY BY SPEEDING UP WASTE SHIPMENT PROCEDURES IN THE EU**

**The Waste Shipments Regulation (WSR) is a vital piece of legislation. The EU guarantees free movement of goods, services and people. It has strict rules in place to ensure that not only waste shipments are safe and traceable, but also that the waste is properly treated at its final destination. The Regulation unfortunately is implemented by the Member States with largely differing enforcement rules. Consequently, the shipments of wastes for recycling are often hampered resulting in counterproductive results. In order to ensure a smooth functioning of EU waste markets, an update of the Regulation, which guarantees the implementation of harmonized rules and procedures across the EU Member States is vital for the completion of the EU Circular Economy. Particularly the improvement of notification procedures of waste shipments to compliant recycling facilities, producing secondary raw materials, offers huge potential. A first Fast-Track Notification pilot project has been successfully approved within 19 working days and testifies of the benefits of speeding up notification procedures, in line with Article 14 of the Regulation.**

The European Commission's forthcoming review of the Waste Shipments Regulation (WSR) (1013/2006) provides a golden opportunity to improve the essential requirements and procedures to facilitate the safe shipments of wastes, i.e. to make the administrative environment more predictable, simpler and more efficient. Improving the conditions for transfer of waste through the entire value chain, by means of harmonized and simplified rules and procedures, will create a more level playing field and fair competition for companies producing secondary raw materials from waste. It will create the conditions for a market in which secondary raw materials compete against primary raw materials which are allowed to move freely within the EU.

A key element is that the existing legislations are interpreted and enforced by applying harmonized procedures by the national competent authorities. Focus should therefore not only be on the legislative texts, but also on the way the Regulation is implemented across the Member States. Today there is a wide variation of the interpretation and the implementation of existing rules – even within the same Member State across different regions or local authorities. *This can be improved by reducing the number of competent authorities that oversee implementing and enforcing the rules.*

Notification procedures in particular can result in delays of several years. The review of the WSR should therefore not be limited to the legal texts only, but expanded towards the simplification and harmonization of the rules applied by the many competent authorities in the EU. A key towards the simplification of these procedures appears to be available by limiting one central competent authority per country coordinating the implementation of the rules and procedures agreed of the regional authorities and procedures of the regional authorities as well as the use of electronic notification procedures.



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Furthermore, the application of Fast-Track Notifications has the potential to reduce the response time of notification requests to pre-consented facilities to one week, as was originally planned but never put into practice. This would imply a major paradigm shift towards a more circular economy, not only from an environmental point of view, but also from an economy point of view. We are convinced that this would promote the materials to move to compliant recyclers more easily and develop the market of secondary raw materials considerably.

**As part of the revision of the Waste Shipment Regulation, we, the co-signatories of this joint statement, would like to urge the Commission to address inconsistencies that arise from the fact that Member States interpret and enforce the rules differently. Particularly speeding up notification procedures appears to be a low hanging fruit.**

26 March 2019

**More information about**

**EERA:** [www.eera-recyclers.com](http://www.eera-recyclers.com)

**EuRIC:** [www.euric-aisbl.eu](http://www.euric-aisbl.eu)

**WEEE Forum:** [www.weee-forum.org](http://www.weee-forum.org)