

# EuRIC comments on the proposed integration of Basel e-waste entries into the OECD Decision

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The European Recycling Industries' Confederation (EuRIC) is pleased to share the views of the recycling industry about the anticipated negotiations among OECD Members on the possible integration of the new Basel Convention e-waste entries<sup>1</sup> into the OECD Decision<sup>2</sup>.



*EuRIC is the authoritative voice of the recycling industry at a European level. Gathering the vast majority of national recycling federations from EU/EEA Member States and leading recycling companies, the Confederation represents about 5,500+ recycling companies – from market leaders to SMEs – generating an aggregated annual turnover of about 95 billion EUR by treating various waste streams such as household or industrial & commercial waste including ferrous and non-ferrous metals, electronic waste (WEEE), end-of-life vehicles (ELVs), packaging (paper and plastics), end-of-life tyres or textiles.*

Through its Members, EuRIC represents the vast majority of e-waste recycling facilities in Europe and therefore has a strong interest in providing comments about the incorporation of the newly adopted Basel Convention entries into the OECD Decision which will enter into force on 1 January 2025 and concern all shipments of e-waste (new entries Y49 and A1181) as well as the objection raised by Japan on 15 August 2022.

The new Basel entries aim at directing e-waste that is moved transboundary to environmentally soundly managed facilities with state-of-the-art technology. As noted in the Japan objection, OECD Members generally have a much greater capacity to ensure the proper recovery of e-wastes, including recycling infrastructure and legal frameworks for environmental protection and environmentally sound management of waste. Therefore, **EuRIC strongly supports the objection raised by Japan and its proposal to retain GC010 and GC020 in Appendix 3 Part II** and to not subject all transboundary movements of e-waste within the OECD to the prior informed consent (PIC) procedure.

OECD Members have been increasingly strengthening their technological capabilities and trade channels for e-waste recovery, and not diminishing them. Printed circuit board waste for example represents a high-value fraction of e-waste which can often contain high concentrations of precious metals like gold, silver, palladium and copper.

It is estimated that 1.2 Mt of the previously referred waste are in the total annual e-waste amounts<sup>3</sup>. Out of the above-mentioned amount, 34% (0.4Mt) is separated from e-waste and recycled in specialised environmentally sound primary and secondary installations for example in the European Union, North America, South Korea, or Japan. Noteworthy to mention is that from the 0.4 Mt, an approximate of 0.36 Mt (90%) of printed circuit board waste is moved across borders to reach recycling facilities.

<sup>1</sup> UNEP/CHW.15/CRP.29

<sup>2</sup> OECD Council Decision on the Control of Transboundary Movements of Wastes Destined for Recovery Operations, OECD/LEGAL/0266

<sup>3</sup> [GTF 2022 - E-Waste Monitor \(ewastemonitor.info\)](https://www.ewastemonitor.info)

Considering that e-waste generation is expected to increase to 74.7 Mt (compared to 53.6 Mt in 2019) in 2030 and reach as much as 110 Mt in 2050, it is safe to assume that printed circuit board scrap will also increase, following a similar trend. Therefore, imposing additional procedures on the movement of e-waste in an already functioning – from an environmental standpoint – market, is completely at odds with the concept of the circular economy.

It is also important to highlight that since the adoption of the OECD Decision, legislative initiatives like the RoHS Directive<sup>4</sup> in the EU have since reduced the use of certain hazardous substances and components of concern in electrical and electronic products. This greatly improved the risk profile for these wastes under the criteria set out under Appendix 6 of the OECD Decision.

**EuRIC is very concerned that a full incorporation of the newly adopted Basel e-waste entries into the OECD Decision could undermine ongoing efforts by OECD Members and various stakeholders to advance the circular economy.** Additionally, there is a high risk that it would paralyze shipments of non-hazardous e-waste fractions such as electric motors or printed circuit boards as well as non-hazardous WEEE-derived materials such as mixed shredded aluminium when subjected to the notification procedure under Y49.

These non-hazardous WEEE-derived materials frequently require transboundary shipments from the recycling plant (pre-treatment, sorting, dismantling etc.) to smelters or plastic compounders as not all countries (incl. European Member States) have the required processing capacities available.

On a very practical side, we would like to stress that notification procedures as currently set up, are complex, overly long and too costly. Notifications are:

- Unpredictable for any reasonable business planning for when deliveries may arrive for repair or recycling as notifications are too complex;
- Overly long as government decision making takes far too long;
- Too costly with the obligation to establish a financial guarantee results in lump sums which can be disconnected from risks, they are due to cover and are withheld for an overly long period.

Should OECD Members agree to the full incorporation of the Basel e-waste entries, complementary actions are urgently needed to ensure that the notification system has the capacity to work at the speed of circular businesses:

- The notification processes should be speeded up through electronic notification procedures between OECD countries, as actively supported by EuRIC.
- As many eligible e-waste recycling facilities as possible should be pre-consented to minimize delays and trade frictions on the movement of e-waste.

These recommendations have also been consistently made in the framework of the revision of the Waste Shipment Regulation (WSR) by EuRIC, as part of papers released earlier on<sup>5</sup>.

<sup>4</sup> Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment

<sup>5</sup> [EuRIC Position for a Revision of the Waste Shipment Regulation Supporting the Circular Economy, December 2020.](#)