

Feedback on draft amendments to Regulation (EC) No 1013/2006 and Regulation (EU) 2024/1157 on changes on shipments of electrical and electronic waste agreed under the Basel Convention

The Danish Chamber of Commerce and Genvindingsindustrien (industry association for recyclers in Denmark) wishes to express its concern to the suggested implementation for electrical and electronic waste agreed under the Basel Convention.

It is of crucial importance for the circular economy to enable the movement of secondary raw materials while reducing the negative environmental and social impact of illegal shipments on third countries. In order to accelerate the circular economy, the ease of shipment of secondary raw materials needs to be on par with primary raw materials.

To support the circular economy and the inner market of the European Union we encourage the EU to maintain the current “green list” procedures for non-hazardous e-waste shipped within the EU for recovery operations. It accounts for all codes being impacted from the changes in the Basel Convention, B110, B4030, GC010 and GC020.

If the codes for non-hazardous e-waste and related green list classifications for low-risk intra-EU shipments destined for recovery is kept it will promote circularity within the European Union. With the purpose to increase the uptake of recycled content, we need to enable valuable materials to move efficiently to EU jurisdictions with facilities that have the capacity for environmentally sound management of e-wastes and critical resource recovery.

With the revision of the Waste Shipment Regulation adopted this year it is decided that waste on the green list has to be notified at least three days before the shipment starts. The shipment will continue to be subject to the general information requirements of Article 18 in the WSR. The Danish Chamber of Commerce and Genvindingsindustrien believe that this will be sufficient to provide transparency and assurances of the environmentally sound management of wastes of these shipments.

The revision, already approved, of the WSR also strengthen the requirements for documentation when exporting waste out of the Union. Allowing the classification of e-waste as greenlisted within the Union does not change this. Should the EU opt to not retain green list classification of non-hazardous e-waste shipments within the EU, then even more shipments must be approved under the PIC controls. In Denmark the competent authority right now has a time delay, where they don't expect to have the capacity to even open the notification before 5 weeks after receiving it, and we have examples of notifications where it has been months before a notification has been approved.