

14-03-2017

Dear evaluation of the Waste Shipment Regulation team,

EERA would like to use this opportunity to provide you with 3 suggestions:

Page 1: Justification:

The need for an evaluation is also justified by a number of concerns about certain WSR provisions causing unnecessary administrative burden as well as delays and additional costs for shipments of waste that have been raised by national authorities and stakeholders.

EERA would like to add: The nature and structure of the organizational aspects with over 100 different competent authorities leads to a wide variety of interpretations of the classification of wastes, the requirement for notifications and also the procedural aspects of the Regulation.

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It will also examine to what extent it helps enhance the efficient use of resources and establish a well-functioning single market for waste treatment services and recovered materials within a more circular EU economy

EERA comment: The market for waste treatment services is not a single market in Europe. The WSR prevents this single market for waste to exist.

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The current procedures and control regimes for the transboundary shipments of wastes for a treatment operation under the WSR will be assessed to check the appropriateness of current practices (e.g. inadequate, sufficient, excessive). This will include an assessment of whether the WSR generates unnecessary administrative or technical barriers, especially for small and medium sized enterprises.

EERA would like to add: Particularly the implementation of Article 14 (Pre-consented recovery facilities) needs to be assessed, as the implementation is reported to be inappropriate.

Perhaps unnecessary, you will find attached the EERA documents on fast track notification, which were sent earlier (October 2016) to you:

- Call for "Fast Track Notifications" for pre-consented facilities in EU
- Results of EERA summer 2016 survey on pre consented facilities

Could you please be so kind to give us some feedback on progress of the fast track notification concept within the EU? Thank you.

Best regards,

Norbert Zonneveld
Executive Secretary

