

Your Voice In Europe: ROADMAP feedback for Evaluation of Regulation (EC) No 1013/2006 on shipments of waste (Waste Shipment Regulation - WSR)

User's data:

- Domain: Organisations other than business/companies/NGOs
- Domain - other: Professional working in a company for treatment of hazardous waste.
- Name: Dr. Ludwig Ramacher
- Email: ludwig.ramacher@remondis.com
- Country: Germany
- Organisation: Remondis Industrie Service GmbH, Heerstraße 29-43, 44653 Herne, Germany
- Headquarter: select
- Size: select
- Publication: can be published with your personal information

Related document: Evaluation of Regulation (EC) No 1013/2006 on shipments of waste (Waste Shipment Regulation - WSR)

Feedback:

a) 99 %, if not more of all wastes which are moved cross border with a notification, are moved, based on Art. 13 “general notification”, a very short and not very clear article, while all decisive articles how to organize a notification are based on a single shipment of waste, using nearly always the singular and are insofar misleading for many interpretations already by that.

The legislation should urgently be adapted to reality and the factually normal case should be the basis of the text and not a scenario which practically does not exist.

b) When doing this the term “essentially similar physical and chemical characteristics” needs clarification, as interpretations between the MS or even within one MS by different competent authorities have an extremely broad range of understanding, partly using an extremely narrow approach.

c) It may then also make sense to define within which range of analysis the waste can be accepted when comparing the waste arriving at the treatment facility with the description in the notification. Something like a range 0

Feedback file: