

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 : Company/Business organisation
- Name :
- Email :
- Country : Finland
- Organisation :
- Headquarter : select
- Size : Small (< 50 employees)
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Related document: Evaluation of Regulation (EC) No 1013/2006 on shipments of waste (Waste Shipment Regulation - WSR)

Feedback:

Our company has shipped waste from Finland via 1-3 countries to the Netherlands for four years. We apply for approximately three shipment permits per year.

During the permit process, the most time taking issue is that authorities from different countries have different demands on what is stated for example in the "contract between the notitifer and the consignee". It is frustrating to modify phrasing only because someone has another opinion on how it should be mentioned. A little change always needs a new signed document which means, that the contract has to be sent to another country and back. This does not happen quickly. We hope that all countries would be using the same contract template. This applies to all general guidance on how to manage the permit applications – same rules to all countries. Now different countries and different officers handle the applications according to their own aspects. We, for example, have almost the same documents every time/year (only changing factor is the carrier/routing) but there is always something to correct/complete/modify. In our opinion, it is never possible to draw up a complete application though it should easily be done according to the Regulation.

What is challenging too, is the long application processing time. In our projects, it takes approximately two months to get the permit from all the countries concerned. Then same again next year. Last year (2016) we got informed by the Dutch authorities that they have a three weeks delay on processing the applications due to the current workload – could this be solved somehow?

Shipping the waste in co-operation with different transportation companies we have noticed that the companies would need more specific instructions on what to take into account when transporting material under this Regulation. It is, for example, always unclear what to do with the movement documents. In Your current guidance is stated that the movement document should accompany with every shipment. In reality, the movement documents cannot

be attached for example to the containers during the sea transportation. It would be great if there would be accurate instructions on how to act on that kind of situations. As an arranger, we would be more than eager to distribute Your instructions to the carriers.

Finally, some compliments for those countries using the waste shipment portal. We really hope that other countries will take it into use too! Despite its few lacks, it saves lots of time and e-mails when you are, for example, able to send the shipment pre-registrations via portal! Some authorities cannot even receive big sized attachments so this helps also avoiding the amount of e-mails. This is a good archive of the notifications, too.

Feedback file: