

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

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

Feedback:

Finnish Environmental Industries YTP welcomes the publication of the Roadmap on the Evaluation of Regulation (EC) No 1013/2006 on shipments of waste (Waste Shipment Regulation, WSR). The evaluation should gather both analyzing the problems but also to offer the solutions for the problems discovered. To get things done smoothly, maybe an action plan is needed as a coordination tool.

The WSR has an important role in developing markets for secondary raw materials. The good function of the markets of secondary raw materials needs to be achieved in order to move towards circular economy. The competitiveness of secondary raw materials compared to virgin raw materials is harmed by the higher administrative burdens, varying measures of national/regional authorities and non-consistent interpretations of EU waste directive in different member states.

We have noticed that there are three major issues which should be tackled in the evaluation of the WSR:

- *Less administrative burdens, more fluent shipments: At the moment, the shipments of non-hazardous wastes and repetitive shipments of wastes face unnecessary administrative burdens. Fast-track approval or the use of electronical procedures would help in reducing unnecessary administrative burden for the aforementioned recyclables.*
- *Coherency between different policy areas: The shipments of the EoW-materials and by-products face often more administrative burdens compared to shipments of virgin raw materials, which harms the competitiveness of recyclables compared to the virgin raw materials. The EoW-material and by-products should be treated like any other raw materials.*

This is the issue that needs to be solved under the revision of the waste framework directive but also under EU's Circular Economy policy such as in the ongoing work of the European Commission/ DG Environment on analyzing the interface between chemicals, products and waste legislation and identification of policy options.

- *Harmonisation: The ongoing revision of waste framework directives aim at creating common rules for waste management in Europe to ensure high levels of environmental and human safety while promoting a more circular economy. This is highly important. As important is to ensure that the member states implement the EU legislation properly and fast enough. For instance, there are currently different interpretations of EoW and/or by-product status issues in the member states, which can lead in potential hassle at the border.*

Feedback file:

[YTP_coomentsWSR24022017.pdf](#)