

Benelux position of the waste sector

Greater uniformity in the rules

For waste and recycling companies, it remains crucial to arrive at greater uniformity in the rules that are applied in the Benelux. In particular, the rules concerning waste transports and for the End-of-Waste statuses of a wide range of wastes - with paper heading the list. Specifically, we are proposing four measures that will help the Benelux to ease the administrative burden in the region and facilitate the evolution towards a local circular economy.

Introduce a binding measure for End-of-Waste status of paper

When producers design their products, right from the start they must take into account what will happen with these products when they arrive at the end of their useful service life (ecodesign).

Moreover, as far as possible we must process materials from these products that are at the end of their lives in such a way that they have properties similar to the original raw materials. Concretely, this means that these materials receive an End-of-Waste status.

The Benelux had already worked out a recommendation for paper in the past, but the Member States never implemented this recommendation.

Given the critical situation on the market for recovered paper today, such an End-of-Waste status is more necessary than ever for paper, and we are therefore asking that the Benelux itself implement a binding measure on the Benelux level.

Proposal

The Benelux implements a binding measure that recognises the End-of-Waste status of paper.

Mutually recognise electronic systems for digital waste transport documents

Every waste transport is associated with mandatory paper documents (consignment notes and identification forms) that, amongst other things, specify where the waste is coming from, who is removing it and where it is going to be delivered. These documents help the legislature and law enforcement agencies to properly inspect the transports, as well as to take the appropriate measures in the event of catastrophes.

Unfortunately, the current approach entails a great deal of administrative red tape. Electronic systems, such as the ewastra system and the elektronische begeleidingsbrief afval (EBA, e-waybill for waste), reduce this administration by digitising the waste transport documents. Moreover, this system also increases the transparency and traceability of waste transports and facilitates the reporting to Europe on waste production.

In Belgium, the ewastra system has already been validated by Flanders and Wallonia. In the Netherlands one is already working with the EBA. Luxemburg uses the Zedal system for the digital notifications, both domestically and (for those going) abroad. Every country has therefore introduced its own system and there is a need to work with interconnected systems. We request that the competent regions within the Benelux accept these electronic waste transport documents, so that all waste transports can take place within the Benelux in an entirely transparent and digitally traceable manner.

For international transport, Transfollow appears to be becoming the European digital model, but it is not yet suitable for waste.

Proposal

The competent administrations of the Benelux countries accept one another's digitised systems for waste transport documents in Belgium, the Netherlands and Luxembourg.

Promote the system of Pre-Consented Facilities

Every year, those who transport hazardous wastes or waste intended for removal (which is not household waste) across national borders have to go through a cumbersome administrative procedure in order to do so: the EWSR notification. This procedure not only entails a substantial administrative burden for the waste-exporting company: the government authorities involved also appear to find the administrative burden so difficult that they often have trouble fully processing the files within the imposed period.

Working with accredited Pre-Consented Facilities significantly reduces the administrative burden for both government authorities and waste-exporting companies, since in this case the export authorisations apply for three years instead of just one.

For this reason, we ask the involved administrations in Belgium, the Netherlands and Luxembourg to promote the system of Pre-Consented Facilities, so that we can achieve administrative simplification on this level as well.

Proposal

The competent administrations of the Benelux countries promote the system of Pre-Consented Facilities in order to simplify the administrative procedures for both government authorities and waste-exporting companies.

No additional obligations for 'horseshoe transports'

When waste is exported for processing in a different country, the waste exporter must go through an EWSR notification procedure in order to do so.

This should not have to be the case for so-called 'horseshoe transports', where the country of origin and the country of destination are the same, but where the waste passes through another country during the transport (because that happens to be the most efficient route). In such a case, we ask that no additional obligations - such as an EWSR notification - be imposed, given that the waste undergoes absolutely no processing in the transit country and no waste is picked up or dropped off during the transport through the transit country.

Proposal

The competent administrations of the Benelux countries impose no additional obligations for so-called 'horseshoe transports' where the country of origin and the country of destination of the waste are the same, but the waste transits through another country because that affords the most efficient route.

