



EUROPEAN ELECTRONICS RECYCLERS ASSOCIATION

Results of EERA Summer Survey 2016 about Pre-Consented Facilities

Chris Slijkhuis - Board member
September 2016

Notification processes are.....

Complex

- 50 questions asked
- Executed very differently by the CA's
- Big (paper-) files need to be completed
- However big, there are always new questions
- And until all questions are answered....

Time consuming

- Notifications can take up to over a year
- Not at all in line with pace of business

Expensive

- Financial guarantees
- Administrative costs
- Loss of business



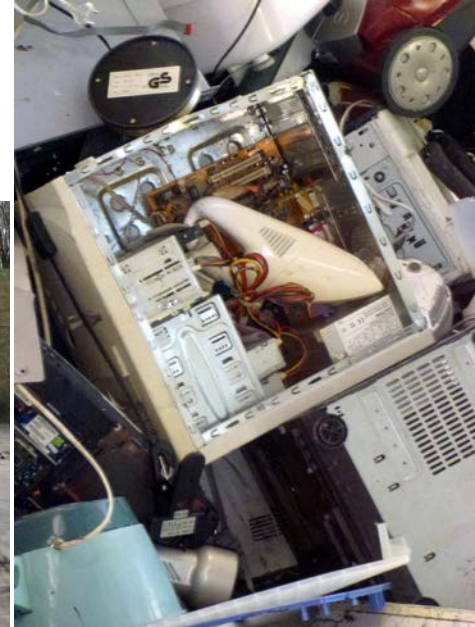
Not suitable anymore for input materials for recycling – Circular Economy

While recyclers are waiting their „competitors“ are in business

- Many pick-up trucks with E-waste
- Travel across borders without problems
- Without much paper work....



Photo Credit: J Huisman The Dutch WEEE Flows, UNU, Bonn (D)



Clearly this is illegal, but there is too little enforcement.....

What can be done to speed this up?



- The concept of becoming a pre-consented recovery facility (art. 14 of WSR)
- Quite a number of conditions have to be fulfilled, which differ per country
- Many countries/regions do not offer pre-consents
- There are 244 pre-consented facilities in Europe in only 10 countries
- Officially there is a much shorter response time (7 days)
 - “This means that the authority of destination will not raise objections concerning shipments of certain types of waste to the facility, and as a consequence the time limit for objections by the authorities of dispatch and transit is shortened to 7 working days”.* <http://ec.europa.eu/environment/waste/shipments/recovery.htm>
- Experience shows that often there is no difference in the handling of these requests
- The reality is that notification requests still take far too long.....

So only in theory this concept is more up to date....and faster....

The EERA proposal: a “Fast-Track Notification”

- This proposal is for European countries and for input to recycling only
- All information is there and it does not need a change of the WSR
- The basis is a pre-consented recovery facility (country of receipt)
- Sender is an authorized collection or treatment plant (country of despatch)
- If despatch location with authorized waste code wants to send this material
- To a pre-consented recovery plant for the same waste code
- No more extra verification steps are needed
- A concept of electronic data exchange should be developed

Advantages:

- Notified waste shipments can start within one week
- **NO MORE PAPERWORK**
- Except for one document (notification form) that needs to accompany the load
- Planning much more flexible and



It would make legal exports at least within Europe so much easier.....

What are the stumbling blocks for Fast-Track Notifications

Summary results of an EERA survey of the summer of 2016



- ▶ **64 CA's in 30 EU states were invited to participate - there was a 34 % participation rate**
 - Only 10% sent in completed questionnaires
 - Slightly over 50 % of the respondents were CA's from Germany (12 out of 22!)
- ▶ **Although Pre-Consents exist, they are not at all a standard in Europe and often even not recognized**
 - Only 50 % of respondents issue pre-consents (Art. 14 WSR)
 - Requirements for pre-consents are not standard - no clear picture of the requirements
 - The EWC is not the standard waste code used for pre-consents – there is no standard code used
 - The treatment process seems to be the most important criterion for issuing pre-consents
- ▶ **Required response time of one week for pre-consented facilities often not matched**
 - Partly because the concept of pre-concepts are not implemented
 - Often there is no distinction between normal notifications and those to pre-concented facilities.

Pre-consents need to be standardized in Europe for „Fast-Track Notifications“

“Fast-Track Notifications” enabling Circular Economy



Pre-consented recyclers must be enabled to work properly in the pace of business....



The details of the survey

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www.eera-recyclers.com

EERA Survey into the acceptance of Pre-Consents Art. 14 WSR - Detailed results -



Chris Slijkhuis
EERA Board Member
Müller-Guttenbrunn Group - Austria



Background of Survey

EERA decided to initiate this survey for a number of reasons, as it appeared that:

- ▶ the concept of Pre-Consents is not recognized in many countries
- ▶ the response times are not different in many cases (should be one week)
- ▶ the procedures and waste codes used are not at all standardized in the EU
- ▶ in many cases it makes no difference if a facility is pre-consented (Art. 14 WSR)
- ▶ The concept of pre-consents are requirement for „Fast-Track Notifications“.

Notifications to pre-consented facilities remain complex and time consuming

Invited CA's to participate in the English Language



Country	Competent Authority	Taal	Antwoord	Compleet
Belgium Federal	Federal	EN	N	N
Belgium Flanders	Flanders Ovam	EN	N	N
Belgium Wallonie	Wallonie	EN	N	N
Bulgaria	Ministry of Environment and Water Waste Management and Soil Protection Directorate 22	EN	N	N
Croatia	Ministry of Environmental and Nature Protection	EN	N	N
Cyprus	Environment Service	EN	N	N
Czech Republic	Ministry of the Environment Waste Management Department	EN	N	N
Denmark	Danish Environmental Protection Agency	EN	Y	Y
Estonia	Ministry of the Environment	EN	N	N
Finland	Finnish Environment Institute	EN	Y	N
France	Ministère de l'écologie, du développement durable et de l'énergie PNTTD	EN	N	N
Greece	Hellenic Ministry for the Environment, Physical Planning and Public Works	EN	N	N
Hungary	National Inspectorate for Environment and Nature	EN	N	N
Iceland	Environment Agency of Iceland	EN	N	N
Ireland	National TFS Office, Dublin City Council,	EN	Y	N
Italy	Ministero dell'Ambiente (only focal Point and not the more than 60 regional offices - see separate list)	EN	N	N
Latvia	State Environmental Service of Latvia,	EN	Y	Y
Lithuania	Environmental Protection Agency	EN	N	N
Malta	Malta Environment and Planning Authority	EN	N	N
Nederland	ILT/Handhavingsbeleid/EVOA en Besluiten vergunningverlening Inspectie	EN	Y	N
Norway	The Norwegian Environment Agency	EN	Y	Y
Poland	Chief Inspectorate for Environmental Protection Division of Transboundary Movement of Waste	EN	N	N
Portugal	Agência Portuguesa do Ambiente	EN	N	N
Rumania	National Environmental Protection Agency	EN	N	N
Slovakia	Ministry of the Environmental of the Slovak Republic	EN	N	N
Slovenia	Environmental Agency of the Republic of Slovenia	EN	Y	N
Spain	Competent Authority Madrid (List of some 20 competent authorities in Spain see separate listing)	EN	N	N
Sweden	Naturvårdsverket/ The Swedish Environmental Protection Agency - Environmental Enforcement Section	EN	N	N
UK England	Environment Agency TFS	EN	N	N
UK Gibraltar	Environmental Agency Gibraltar	EN	N	N
UK Northern Ireland		EN	N	N
	Hazardous Waste/TFS Section			
UK Scotland	The Scottish Environment Protection Agency	EN	N	N
UK Wales	Natural Resources Wales	EN	N	N

Participated 7 of 32 (22%) CA's of which 2 (6%) completed the full questionnaire

Footnote: Greece could not be invited as there does not seem to be an e-mail address – the telephone number was not answered to.

Invited CA's to participate in the German Language



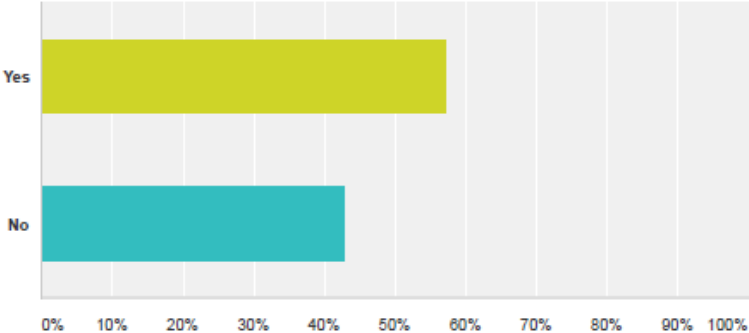
Country	Competent Authority	Taal	Antwoord	Compleet
Austria	Bundesministerium für Land- und Forstwirtschaft, Umwelt und Wasserwirtschaft	DE	Y	Y
Germany	DE 006 Berlin	DE	Y	N
Germany	DE 008 Baden-Württemberg	DE	N	N
Germany	DE 007 Bremen	DE	N	N
Germany	DE 009 Hamburg	DE	Y	N
Germany	DE 010 Darmstadt (Hessen)	DE	N	N
Germany	DE 011 Gießen (Hessen)	DE	N	N
Germany	DE 012 Kassel (Hessen)	DE	Y	Y
Germany	DE 014 Niedersachsen	DE	N	N
Germany	DE 015 Brandenburg	DE	Y	N
Germany	DE 016 Arnsberg NRW	DE	Y	Y
Germany	DE 017 Detmold NRW	DE	Y	N
Germany	DE 018 Düsseldorf NRW	DE	Y	N
Germany	DE 019 Köln NRW	DE	N	N
Germany	DE 020 Münster NRW	DE	N	N
Germany	DE 021 Rheinland-Pfalz	DE	N	N
Germany	DE 022 Dresden Sachsen	DE	Y	N
Germany	DE 023 Weimar Thüringen	DE	N	N
Germany	DE 024 Saarbrücken Saarland	DE	N	N
Germany	DE 025 Schleswig-Holstein	DE	N	N
Germany	DE 026 Oberbayern	DE	Y	N
Germany	DE 027 Niederbayern	DE	Y	Y
Germany	DE 028 Oberpfalz	DE	N	N
Germany	DE 029 Unterfranken	DE	Y	N
Germany	DE 030 Oberfranken	DE	N	N
Germany	DE 031 Mittelfranken	DE	N	N
Germany	DE 032 Schwaben	DE	Y	N
Germany	DE 040 Sachsen-Anhalt	DE	N	N
Germany	DE 049 Mecklenburg-Vorpommern	DE	N	N
Liechtenstein	Office of Environmental Protection Waste Management Division	DE	N	N
Luxemburg	Administration de l'Environnement	DE	Y	N
Switzerland	Bundesamt für Umwelt BAFU Sektion Altlasten und Industrieabfälle	DE	Y	N

Participated 15 of 32 (47%) CA's of which 4 (12,5%) completed the full questionnaire

(Q1) Do you as WSR competent authority issue pre-consents to treatment facilities within your territory of competence?

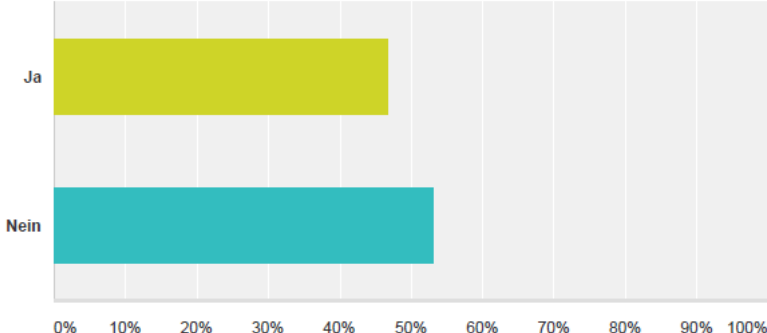


English Questionnaire (7 replies on 7)



Reply Options	Replies	
Yes	57.14%	4
No	42.86%	3
Total		7

German Questionnaire (15 replies on 15)



Antwortoptionen	Beantwortungen	
Ja	46,67%	7
Nein	53,33%	8
Insgesamt		15

(Q2) What are the rules that must be followed by recycling facilities to obtain a pre-consent –if you only have these rules in your own language, we would also accept these in the local language?



English Questionnaire (1 replies on 7)

The pre-consented facilities need a ordinary permit from The Norwegian Environment Agency. We have no national legislation, but follow art. 14 in (EC) 1013/2006

German Questionnaire (2 replies on 15)

Spezielle Verwertungsanlagen (DE NRW)

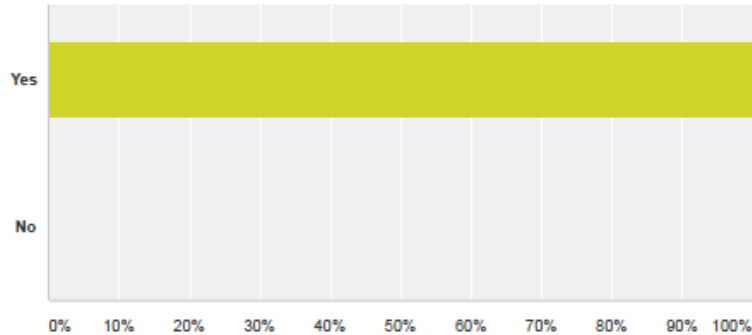
EMAS Zertifikat oder ISO 14001 oder Gleichwertiges, Anlagengenehmigung, elektronische Eingangs- und Verwertungsmeldung (AT)

(Q3) Do you evaluate the treatment process of the applicant before you issue a pre-consent?



English Questionnaire (1 reply on 7)

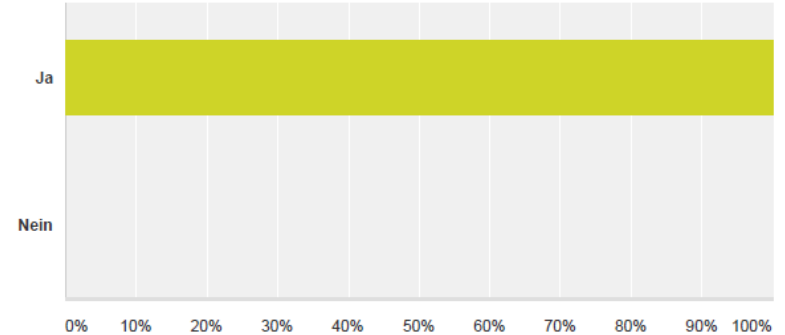
Answered: 1 Skipped: 6



Antwortoptionen	Beantwortungen
Yes	100.00% 1
No	0.00% 0
Total	1

German Questionnaire (2 replies on 15)

Beantwortet: 2 Übersprungen: 13



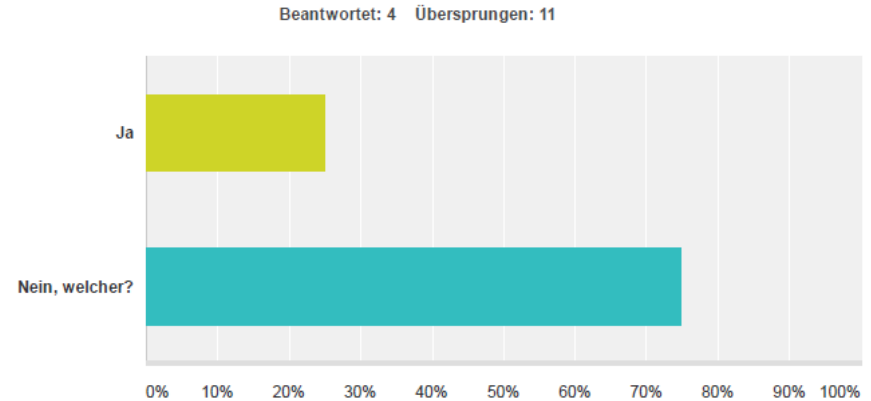
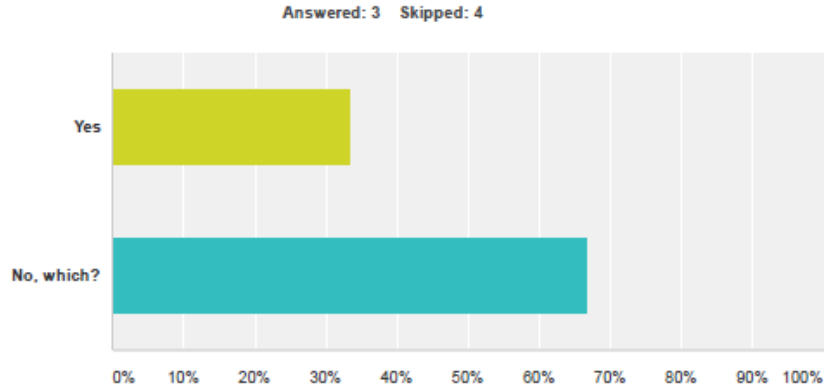
Antwortoptionen	Beantwortungen
Ja	100,00% 2
Nein	0,00% 0
Insgesamt	2

(Q4) Are pre-consents always issued based upon the European Waste Code or any other waste classification?



English Questionnaire (3 reply on 7)

German Questionnaire (4 replies on 15)



Antwortoptionen	Beantwortungen	
Yes	33.33%	1
No, which?	Responses 66.67%	2
Total		3

Antwortoptionen	Beantwortungen	
Ja	25,00%	1
Nein, welcher?	Beantwortungen 75,00%	3
Insgesamt		4



(Q4) Are pre-consents always issued based upon the European Waste Code or any other waste classification. If not EWC, which one?

English Questionnaire (1 replies on 7)

There is no pre-consented facilities in our country and I cannot answer to this question. Requirements for pre-consent facilities is mentioned in Article 14 of Waste shipment regulation (LV).

We do not find this question relevant since we do not issue pre-consents to treatment facilities (DK)

German Questionnaire (3 replies on 15)

Anhang III, IIIA, IIIB, IV und IVA der VO (DE NRW)

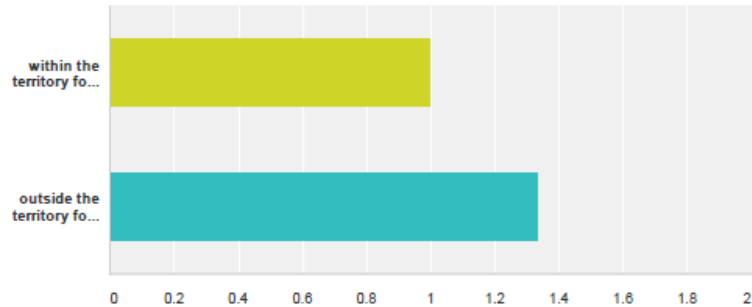
Nationaler Code, Basel Code (Bayern DE)

Österreichischer Abfallkatalog (AT)

(Q5) Do you manage to stay within the response time for the notification requests of one week for shipments to pre-consented treatment facilities:

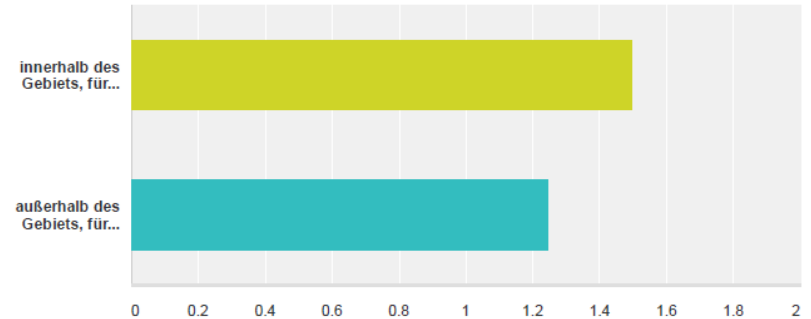


English Questionnaire (3 reply on 7)



	Yes	No	Gesamt	Gewichteter Mittelwert
within the territory for which your authority is responsible – i.e. for imports	100.00% 2	0.00% 0	2	1.00
outside the territory for which your authority is responsible – i.e. for exports	66.67% 2	33.33% 1	3	1.33

German Questionnaire (4 replies on 15)



	Ja	Nein	Insgesamt	Gewichteter Mittelwert
innerhalb des Gebiets, für die Ihre Behörde zuständig ist – d.h. Einfuhr	50,00% 2	50,00% 2	4	1,50
außerhalb des Gebiets, für die Ihre Behörde zuständig ist – d.h. Export	75,00% 3	25,00% 1	4	1,25

(Q6) If the answer to one of the above 2 questions is “No”, could you explain why this is the case?



English Questionnaire (1 replies on 7)

We do everything we can to stay within the response time but it is not always possible. Since we don't have any pre-consented treatment facilities we don't have any imports of this (DK).

German Questionnaire (2 replies on 15)

Nicht immer, aber oft (AT).

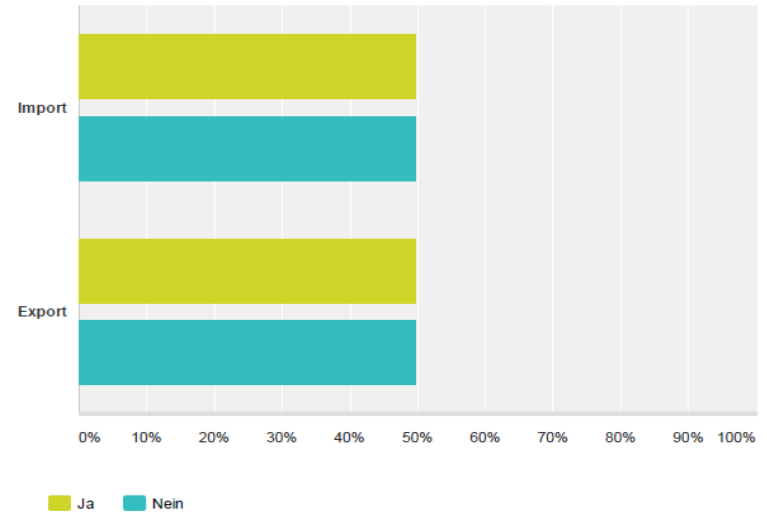
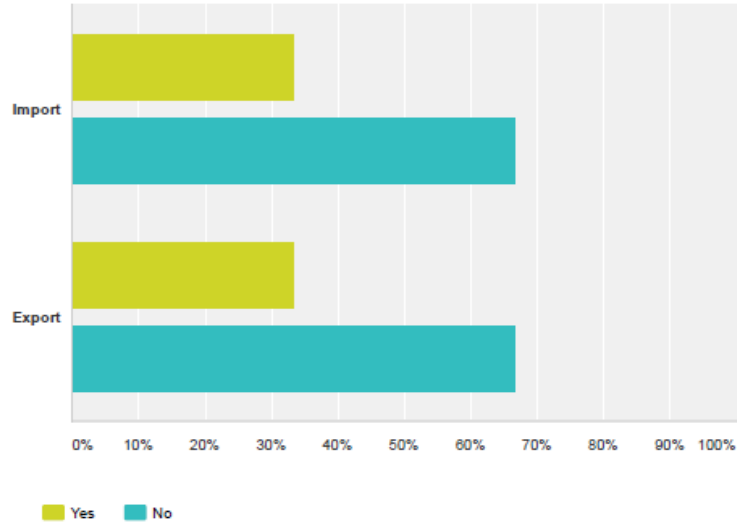
Für Exporte Ja. Für Importe Nein, weil in unserem Gebiet keine Anlage vorhanden ist (Nieder-Bayern DE)

(Q7) Do you differentiate the processing of notification requests for deliveries to pre-consented treatment facilities and notification requests to non-pre-consented treatment



English Questionnaire (3 reply on 7)

German Questionnaire (4 replies on 15)



	Yes	No	Gesamt
Import	33.33% 1	66.67% 2	3
Export	33.33% 1	66.67% 2	3

	Ja	Nein	Insgesamt
Import	50,00% 2	50,00% 2	4
Export	50,00% 2	50,00% 2	4

(Q7 Comments) Do you differentiate the processing of notification requests for deliveries to pre-consented treatment facilities and notification requests to non-pre-consented treatment?



English Questionnaire (1 comment)

We follow the same procedure for both Consents (NO)

German Questionnaire (2 comments)

Import: keine Anlage vorhanden.
Export: unserer Ansicht nach werden bei beiden Anlagentypen zur Entscheidung über die Notifizierung die gleichen Unterlagen benötigt (Nieder-Bayern).

Ja, Fristen nach Art. 8 und 9 der VO EG1013/2006 (NRW DE)

Summary and Conclusions



► Of the total population we had a 45 % participation rate

- Only 10% of the population sent in completed questionnaires (32% of participants)
- Slightly over 50 % of the respondents were CA's from Germany (12 out of 22)

► Pre-Consents are not at all a standard in Europe

- Only 50 % of respondents issue pre-consents (Art. 14 WSR)
- Requirements for pre-consents are not standard, but we did not get a clear picture of the requirements
- The European Waste Code is not the standard waste code used for pre-consents – there is no standard code
- The treatment process seems to be the most important criterion for issuing pre-consents

► Required response time of one week for pre-consented facilities often not matched

- Partly because the concept of pre-concepts are not implemented
- Often there is no distinction between the normal notification procedures and those to pre-concented facilities

The concept of pre-consents not recognized in major parts of Europe.