

Nordic position paper - Waste shipments

Norsk Industri (NO), Affalds- og ressourceindustrien (DK), Återvinningsindustrierna (SE), Kierrätysteollisuus ry (FI), represent the private recycling industry in the Nordic countries.

We believe that a well-functioning waste market in the Nordic countries is crucial for a resource efficient treatment of waste. This position paper provides input to the Nordic Environmental Agencies, that are responsible for implementing the European waste shipments regulation.

Co-operation on waste policies in the Nordic region makes it possible to invest in new and industrial treatment facilities, that requires scale and volume in order to be economically feasible. Free and fair competition, open waste markets, and reduced administrative burdens for waste shipments in Europe will strengthen both the financial basis for new investments in waste infrastructure and the circular economy. A common approach to the implementation and follow-up of the European Waste Shipment Regulation (WSR) is necessary, so that the waste management industry can compete in developing the best solutions for waste treatment in the Nordic region. This means that there must be a common understanding regarding key concepts and definitions in the WSR.

The Nordic organisations for the private recycling industries underline the following four main priorities with regard to the implementation of the revised WSR.

Securing case handling capacity and efficient procedures

The WSR combines the purposes of having a well-functioning and open waste market and the need for control that waste is treated in an environmentally sound manner. The core of this system is that exporters and importers of waste, subject to notification-obligations, must have consent from the authorities before shipments take place. However, it is a strong concern that the environmental authorities in the Nordic countries do not have the sufficient resources to consider and approve notifications within the time constraints set in the European regulation. Additionally, we believe that there is a potential for more efficient case handling procedures.

We can see that long case handling times by, for example, Swedish authorities of up to 8 months, will lead to further delays for the rest of the Nordic countries, meaning that the Nordic countries are highly dependent on the available resources by their neighbours. Long case handling processes hampers the Nordic waste market where Nordic industries experience loss in valuable business opportunities and competitiveness whilst it is also causing unnecessary administrative burden and uncertainties for the industry. Therefore, it is vital that the Nordic authorities in charge of the WSR are provided with sufficient administrative resources and strive for best practice in their procedures.

Common approach to notifications, route starting points and change of carriers

According to the WSR, Art. 13 c), the notifier may submit a general notification covering several shipments, as long as the countries of transit are the same, the routing of the different shipments is indicated in or annexed to the notification document, and the location from which the shipment starts is the same. Today - most authorities in the Nordic countries allow for general notifications covering several starting points, as long as the exit point for the shipment is the same.

We are concerned that the new wording in the European regulation may be interpreted so that separate notifications must be sent for all starting points, regardless of the same exit point for the shipment. This will result in 3-4 times more notifications from the industry, putting even more

pressure on the limited case handling capacity at the Nordic environmental authorities and increases the administrative burden on the Nordic industry. Therefore, we urge the Nordic authorities to continue the practice where general notifications may cover several starting points and coordinate this interpretation of the regulation. We also stress that changes of carriers must not be regarded as an essential change, which require a new notification, according to the regulation art. 17. This is in line with the current practice in the Nordic region.

Co-operation for shipments of waste destined for disposal

According to the WSR, Art. 11, a number of strict conditions must be met before shipments of waste destined for disposal can be allowed. However, waste shipments for disposal may be allowed in cases where it is demonstrated that the waste concerned is only produced at such a small quantity that the provision of new specialized disposal facilities within that Member State would not be economically viable.

The EU Commission shall adopt an implementing act with criteria for the uniform application of the conditions regarding technical feasibility and economic viability. The regulation also opens for bilateral agreements making the notification procedure for shipments of specific waste flows less stringent, in exceptional cases. We welcome a harmonised European approach to these criteria. In the Nordic countries, many waste streams destined for specialized treatment facilities are produced in very small volumes. Hence, setting up specialized infrastructure and facilities for waste treatment in every country is not economically viable. In such cases, Nordic cooperation should contribute to the establishment and presence of sufficient waste treatment capacity in the region.

Harmonised implementation by Nordic authorities

We have received concerns from the recycling industry about risks of different interpretations of the WSR in the Nordic countries. This is especially true with regard to what is considered to be recovery and disposal operations. It is crucial that such key concepts of the WSR are interpreted the same way. We have also noticed that the Nordic authorities may grant permissions according to their own set of criteria in the case handling of waste shipment notifications. In order to speed up the processes, we believe that it is essential that the Nordic countries increase their dialogues and harmonise their processes. This will be increasingly important when the new regulation, with strict conditions for shipments to waste disposal, comes into force.

Finally, there are concerns about the new digital system that is supposed to be implemented in May 2027. We would like to emphasize the need for this new digital system to be harmonized in Europe and not fragmented into several digital systems on Member State level. Furthermore, we stress that the timeline for the digitalization process should not be set until the IT solution has been fully implemented and agreed upon by all Member States, ensuring a coordinated and efficient transition.

This position paper is prepared and supported by the following associations, organizing private waste management and recycling companies in Finland, Denmark, Sweden and Norway:

- **Kierrätysteollisuus ry - Recycling Industries of Finland (FI)**
- **Affalds- og ressourceindustrien - Danish Waste and Recycling Industries' Association (DK)**
- **Återvinningsindustrierna - Swedish Recycling Industries' Association (SE)**
- **Norsk Industri - Federation of Norwegian Industries (NO)**