

# Consultation on certification for waste treatment facilities

## About the consultation questionnaire

The consultation will remain open until 17 March 2014. Only a few of the questions are compulsory so please feel free to answer only those relevant to you. Questions marked with an asterisk (\*) require an answer to be given. Please note: once you start filling in this questionnaire, the maximum time allowed by the system to complete it is 90 minutes. Partial responses will not be saved. It is therefore a good idea to download the full questionnaire as a PDF and prepare your answers in advance. It can be found on the consultation page. Thank you very much for taking the time to help with this consultation. The consultation will remain open until 17 March 2014.

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## About the respondent

Your full name\*

Your full name \*

Are you replying as\*

Are you replying as \*



Industry Association



Individual Company



Local Authority



National Authority



Other

Other: please specify

If responding on behalf of an organisation/association/authority, please provide the name\*

If responding on behalf of an organisation/association/authority, please provide the name \*

Your country/ies – If responding on behalf of an organisation/association/authority, please specify all countries represented by your membership

How would you prefer your contribution to be published on the Commission website?\*

- Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Anonymously (I consent to publication of all information in my contribution except my name/the name of my organisation and I declare that none of it is under copyright restrictions that prevent publication)
- Not at all - keep it confidential (The contribution will not be published, but will be used internally within the Commission)

## Part 1

Do you have data on flows of waste exported from the EU to non-EU countries that could be useful in assessing the need for a certification scheme and for the development of such a scheme?

Do you have data on flows of waste exported from the EU to non-EU countries that could be useful in assessing the need for a certification scheme and for the development of such a scheme?

- Yes
- No
- No answer

If yes, please indicate what type of data you have including key figures

Export groene lijst afval 2012 (in tonnen) conform gegevens Eurostat		
	OESO	niet-OESO
Textiel afval	1	11
Plastic afval	4	216
Metaal afval	1750	1191
Papier afval	140	2078
Industrieel niet gevaarlijk afval	79	137
	1975	3634

The data of Dutch Customs and the National Waste Notification Office also contain the name and address of the consignee. However this consignee is not always the (final) treatment facility. Information contained in customs declarations therefore cannot be used for WSR purposes.

## Part 2

2.1 What is the impact of CURRENT waste exports to non-EU countries on the competitiveness of the sector(s) you are active in (if applicable)?

- Positive impact overall
- Negative impact overall
- No answer

Please elaborate briefly

Answer: Not relevant for the Ministry to answer

2.2 What do you expect to be the impact of FUTURE waste exports to non-EU countries on the competitiveness of the sector(s) you are active in (if applicable) if current trends continue?

- Positive impact overall
- Negative impact overall
- No answer

please elaborate briefly

answer; Not relevant for the Ministry to answer

## Part 3

3.1 Which is your PREFERRED option out of the ones assessed in the RPA study

- No EU certification scheme
- Voluntary EU certification scheme
- Mandatory EU certification scheme
- Mandatory EU certification scheme including mandatory third-party verification
- None of the above
- No answer

Please briefly explain why (benefits vs. costs, ease of implementation, reasonable administrative burden for SMEs, effectiveness in terms of the objective of fair competition, etc.)

Answer:

A certification scheme is preferred because at this moment it is not possible to check the way the waste is treated in third countries as this takes place outside the jurisdiction of the inspectorate. Meanwhile the waste shipment regulation demands a treatment that is comparable to European treatment. The Dutch ARK (NCA) has concluded in her study that the Inspectorate cannot verify that exported waste is treated in an environmentally sound manner in third countries. Although a certification scheme may not be the ultimate solution to this, more inspection in third countries against European standards may increase the level of environmentally sound processed waste.

We prefer a mandatory scheme because this is most clear and straightforward, most fair.

3.2 Which is your LEAST PREFERRED option out of the ones assessed in the RPA study

- No EU certification scheme
- Voluntary EU certification scheme
- Mandatory EU certification scheme
- Mandatory EU certification scheme including mandatory third-party verification
- None of the above
- No Answer

3.3 If you have further comments on the options assessed in the RPA study, please elaborate briefly

Answer: none

## Part 4

4.1 If an EU certification scheme (voluntary or mandatory) for waste treatment facilities were to be introduced, which categories of waste should be covered as a matter of priority?

- All "green" listed waste under the Waste Shipment Regulation
- All other non-hazardous waste included in Part 2 of Annex V to the Waste Shipment Regulation
- Certain specific "green" listed or other non-hazardous waste under the Waste Shipment Regulation

If you have answered "Certain specific "green" listed or other non-hazardous waste under the Waste Shipment Regulation", please specify which waste categories

## Part 5

Please briefly give any further comments that you consider important in this context

The certification system should also refer to the extended producers responsibility legislation (e.g. Packaging and WEEE) which demands for the calculation evidence of environmentally sound treatment for waste that is treated outside the EU.

We consider it of great importance that if the Commission decides to come with a proposal for obligatory certification, the text of the proposal connects with the practice of accreditation and certification. Unfortunately with some end of waste regulations we see that this is not the case and accreditation and conformity assessment bodies have difficulties carrying out there tasks under these regulations. Close cooperation with DG Enterprise and the European organization for accreditation (EA) is therefore necessary.

Last remark is the request to pay attention to the administrative burdens of the Authorities and Industry. Please, make feasible and enforceable legislation.