



Position Paper

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EUROCHAMBRES Position on the Revision of the EU rules on Waste Shipment

EUROCHAMBRES welcome and support the Commission's efforts to align the waste shipment rules with recently adapted waste legislation as well as to enhance their implementation and enforcement. In order to further promote the Circular Economy, the creation of a fully functioning market for secondary raw materials must be one of the top priorities. Waste shipments for reuse, recycling, energy recovery and disposal are an integral part of such a market. Chambers of Commerce stand ready to actively contribute to these initiatives.

In the revision of the EU Waste Shipment rules we urge the European Commission to take into due account the following objectives:

Enable a functioning internal market for secondary raw materials

In order to create such a market, the removal of legislative barriers to trade in waste and recycled materials is essential. This is why EUROCHAMBRES very much welcome the Commission's commitment to assess the need for harmonised end-of-waste criteria. Mutual recognition should only be the second option. This is also one of the key results of the consultation on the Interface between product, chemical and waste legislation in 2018. Chambers therefore urge the Commission to come forward with a proposal for a harmonised definition for both end-of-waste criteria and hazardous waste. This would also make guidance for common interpretation and how to determine whose decision would prevail effectively redundant.

EUROCHAMBRES would also like to underline the importance of standardisation in this regard and invite the Commission to share its assessment of ongoing work at national, European and international level with relevant stakeholders. In line with the 2019 Circular Economy Action Plan Implementation Report, the European Standardisation Organisations published a set of horizontal criteria to measure durability, reparability, recycled content etc of energy-related products by mid-2020. Subsequently they have to be promoted to ensure widespread use and acceptance, including advisory and assistance for SMEs. Chambers are willing to cooperate with European and national authorities and standardisation bodies. The definition of common European standards for secondary raw materials will encourage the development of a proper market, allowing an optimal allocation of these materials.

Last but not least, the Chambers of Commerce are also very open to suggestions on a market observatory on secondary raw materials, as it could be useful in mapping potential bottlenecks, necessary infrastructure improvements and the like. We stand ready to support the Commission's efforts in this regard. In fact, a number of European Chambers already operate material exchange platforms. Their know-how and expertise can feed into the set-up of the market observatory. Please find more information on these Chamber initiatives in our publication "[Chambers for a circular economy](#)".

Decrease waste generation

Chambers of Commerce and Industry agree that elements such as resource use, recyclability and repairability are determined to a great extent in a product's design phase. We therefore acknowledge the need to incorporate more resource efficiency considerations into the upcoming Ecodesign Working Plan.

The focus must be on cost-efficient reduction of resource use upstream and decreased waste generation downstream. It is crucial to find a balance between standards and entrepreneurial freedom that allows for individual product design and high product quality. Moreover, to ensure planning certainty, the introduction of design standards must allow for a sufficient preparatory period. Especially SMEs need assistance in changing the design of their products. Prior to the elaboration of such requirements their necessity to achieve the desired result has to be assessed, taking into consideration systems of self-regulation that have proven their benefit in some areas.

The Chambers equally agree with the European Commission that consumers are a key element to reduce waste and for a functioning circular economy. A Commission study from 2014 concluded that a majority of consumers needs more information on the environmental impact of a certain good. The Commission and national governments, but also business organisations, shall engage in communication efforts to make circularity relevant to all kinds of stakeholders of society. Political stakeholders, producers, companies in the supply chain, consumers, research and education institutions among others have to have a clear understanding of the concept of waste generation and value retention and of the costs, risks, benefits and opportunities related to it.

Exploit all options at hand

Where appropriate and duly taking into account the waste hierarchy, we would also like to underline the importance of energy recovery from waste materials in order to replace fossil fuel power plants and fossil fuels in industrial processes. This readily available technology remains one of the tools at hand to decrease greenhouse gas emissions.

In addition, Chambers are sceptical with regards to an outright ban of waste exports to third countries. We do, however, acknowledge that this should only be an option where appropriate treatment and/or disposal can be guaranteed. In order to enhance the capacity to collect, sort and recycle waste materials of third countries as well as to boost the European economy, the export of such technologies should be further promoted.

In general, the enforcement of waste shipment legislation needs to be improved and aligned with recently adapted waste regulation. The overall aim of the revision must be to simplify procedures and reduce the administrative burden of implementation. Guidance material for national authorities but also for businesses, e.g. on prior notification and consent procedures, can be very useful. The development of an electronic data exchange system at EU-level, taking into account already existing databases in order to keep additional reporting requirements, especially for SMEs, to a minimum, is also seen positively.

EUROCHAMBRES – The Association of European Chambers of Commerce and Industry represents over 20 million enterprises in Europe – 93% of which are SMEs – through members in 43 countries and a European network of 1700 regional and local Chambers.

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