

October 2022

## Industry Coalition Position on the Revision of the Waste Shipment Regulation

The undersigned organisations, representing all levels of the plastics value chain, welcome the proposal for a revision of the Waste Shipment Regulation (WSR) as an opportunity to facilitate intra-EU shipments with the aim of transitioning to a circular economy and increasing the traceability of plastic waste.

We call on the European Parliament and Council to reinforce the rules on pre-consented status to ensure harmonisation across the EU Member States (MS).

Progressing towards a circular economy represents the greatest opportunity for the plastics value chain in reducing its emissions and supporting the EU's Green Deal objectives. And in the process will help moving up the waste hierarchy and reduce the usage of largely imported fossil resources. Access to waste at the needed scale and smooth facilitation of shipments of waste for recycling within the European Single Market represent significant challenges in reaching these objectives.

Sending waste shipments to pre-consented facilities is a secure and swift way to circulate valuable plastic resources in the Union so that they are available for waste facilities to recycle within the EU internal market for use in secondary materials, while ensuring the necessary environmental protections. Improving procedures for pre-consented facilities is crucial to ensure that plastic waste easily finds its way to the optimal treatment option across the EU.

We call on decision-makers to maintain the current definitions of EU48 and EU3011 as a vital precondition to the smooth shipment of plastic waste for recycling within the EU.

We believe that strengthening and ensuring the enforceability by National Competent Authorities of Article 14 on pre-consented recovery facilities is crucial.

Legislation to allow all plastics waste for recycling to be shipped smoothly across internal EU borders must be strengthened and include:

- Harmonisation of criteria across the EU for recycling facilities to obtain a pre-consent
- Notifications of shipments for compliant facilities being fast-tracked
- Pre-consents being granted quickly, and the 7-year validity of pre-consented status maintained or made longer (e.g. 10 years), once a facility has concurred with the legal requirements given that consent can be withdrawn if a facility is no longer compliant
- Reducing the financial burdens by exempting pre-consented facilities from having to take out a financial guarantee that has blocked over €1 billion in capital in the EU, and prioritising insurance instead

October 2022

- The routing procedure being made less arduous by not requiring interim tracking movement information to be provided in advance of shipment
- A central system for digitalised exchange of information and documents
- A working group being set up to bring together decision-makers, competent authorities, inspectors and industry representatives to ensure that Article 14 is effectively implemented in a standardised way across the EU

Given the high impact potential of intra-EU waste shipments to facilitate the EU climate and circularity objectives, we remain at your disposal for any questions and would be happy to meet to further exchange on this crucial matter in a joint meeting.

### Signatories



**Chemical Recycling Europe**  
[www.chemicalrecyclingeurope.eu/](http://www.chemicalrecyclingeurope.eu/)

John Sewell  
Secretary General



**EERA**  
[www.eera-recyclers.com/](http://www.eera-recyclers.com/)

Chris Slijkhuis  
Expert on Waste Shipment  
& Former Board Member



**EuPC**  
[www.plasticsconverters.eu](http://www.plasticsconverters.eu)

Alexandre Dangis  
EuPC Managing Director



**EuRIC**  
[www.euric-aisbl.eu/](http://www.euric-aisbl.eu/)

Emmanuel Katrakis  
Secretary General



**FEAD**  
[www.fead.be](http://www.fead.be)

Valérie Plainemaison  
Secretary General



**Plastics Europe**  
<https://plasticseurope.org/>

Virginia Janssens  
Managing Director