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Waste Shipment Regulation proposal – EUROBAT’s position

EUROBAT welcomes the proposal on Waste Shipment Regulation published on 17 November 2021 by the European Commission. It is of paramount importance for the EU internal market to have a clear regulation that allows, clarifies and facilitates waste shipment inside, and outside of the EU, given that certain environmental and socio-economic conditions are met. We clearly advocate for an EU policy on waste shipments that promotes recycling in the EU and supports the transition to a truly sustainable economy. To this extent, there are several remarks we as a key industry player want to raise.

Removal of certain barriers and alignment with already existing or upcoming policies provisions in the same policy area is essential. In this sense, a clear consistency of the Waste Shipment Regulation with the End of Life Vehicles Directive and the Batteries Regulation will help to reach the Green Deal objectives and facilitate the implementation of those policies. Subsequently, it is necessary to adapt the EU legislation together with waste shipment rules so already-used batteries can be easily shipped into the EU Member States for proper treatment and recycling. In parallel, equivalent conditions for recycling waste outside the EU should be applied, coherently with Article 58 of the Batteries Regulation proposal.

The end-of-life management of certain batteries in low- and middle-income countries outside the EU can be below the EU standards, with negative consequences for people and the environment. Allowing imports of wasted batteries with a ‘Hazardous Waste’ status in the EU Member States for recycling will help to reduce climate change effects and public health in areas that currently have no recycling infrastructure. In this sense, the occupational safety and health (OSH) Directive is a clear example of how Member States guarantee minimum safety and health requirements throughout the entire EU.

To tackle this issue, transboundary shipment of waste aimed for recycling in the EU should be liberated of all administrative burdens that slow down or even prevent this process. Facilitating the imports of spent batteries into the EU for recycling should be a key provision of this Regulation.



In this sense, having the documentation via electronic means might accelerate the process (Article 18 and Annex VII); however, there is a requirement of financial guarantees that translates into high financial cost, applying for notifications usually results into a high administrative burden and these notifications are often delayed which in practice makes them valuable for a shorter period (only for 6-8 months and not for 1 year). In this vein, the proposal does not seem to streamline enough the process of calculation of these financial guarantees and it risks hindering the procedure (Article 7). We hope that this crucial point of the Waste Shipment Regulation could be discussed and properly addressed during the negotiations in the Parliament and Council.

Moreover, it is important to facilitate the intra-EU shipment of batteries to boost the circular economy. To this end, we welcome the proposal of a fast-track procedure for shipments of waste in order to speed up shipments to waste recovery facilities that operates under high-quality standards, defined in Article 14. As proposed in Article 26, the establishment of a single EU electronic system for recording waste shipments between the Member States might facilitate the intra-EU shipment. However, this should not translate into a duplication of the procedures that will create burdens for the industry and will hamper the proper implementation of a circular economy.

About EUROBAT

EUROBAT is the leading association for European automotive and industrial battery manufacturers, covering all battery technologies, and has more than 50 members. The members and staff work with all policymakers, industry stakeholders, NGOs and media highlight the important role batteries play for decarbonised mobility and energy systems as well as all other numerous applications.

