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Assessment of the non-OECD countries and territories that requested to be included in the list pursuant to Article 41 of Regulation (EU) 2024/1157
Export of non-hazardous waste from the EU to non-OECD countries

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1.	INTRODUCTION	6
2.	ASSESSMENT PROCESS	7
2.1	Required information.....	7
2.2	Assessment approach	9
2.3	Evaluation of ferrous and non-ferrous metal waste.....	11
3.	ASSESSMENT OF COUNTRIES AND TERRITORIES THAT REQUESTED INCLUSION IN THE LIST OF COUNTRIES	13
3.1	Andorra	14
3.2	Bangladesh	14
3.3	Bosnia and Herzegovina.....	17
3.4	Egypt.....	19
3.5	El Salvador	21
3.6	Georgia	22
3.7	Hong Kong Special Administrative Region (HKSAR).....	24
3.8	India	25
3.9	Indonesia	28
3.10	Kazakhstan.....	30
3.11	Lao PDR	31
3.12	Malaysia.....	32
3.13	Mauritius	34
3.14	Moldova	36
3.15	Monaco	37
3.16	Montenegro	38
3.17	Morocco	39
3.18	Nigeria	41
3.19	North-Macedonia.....	42
3.20	Oman	43
3.21	Pakistan	45
3.22	The Philippines	47
3.23	Saudi Arabia	48
3.24	Serbia	50
3.25	Singapore.....	52
3.26	Sri Lanka.....	52
3.27	Taiwan	55
3.28	Thailand.....	56
3.29	Togo	58
3.30	Tunisia	58
3.31	Ukraine	61
3.32	Viet Nam.....	62
4.	IMPROVING WASTE MANAGEMENT IN THIRD COUNTRIES	64
	Annex I: Andorra	66

I.1 Generic assessment – waste type specific assessment	66
I.2 Andorra: conclusions	68
Annex II: Bangladesh	70
II.1 Generic assessment	71
II.2 Waste-stream specific assessments	73
II.3 Bangladesh: conclusions	75
Annex III: Bosnia and Herzegovina	76
III.1 Generic assessment	76
III.2 Waste-stream specific assessments	79
III.3 Bosnia and Herzegovina: conclusions	79
Annex IV: Egypt	81
IV.1 Generic assessment	81
IV.2 Waste-stream specific assessments	83
IV.3 Egypt: conclusions	86
Annex V: El Salvador	88
V.1 Generic assessment - Waste-stream specific assessment	88
V.2 El Salvador - conclusions	91
Annex VI: Georgia	92
VI.1 Generic assessment	92
VI.2 Waste stream specific assessments	94
VI.3 Georgia: conclusions	95
Annex VII: Hong Kong Special Administrative Region (HKSAR)	Error!
Bookmark not defined.	
VII.1 Generic assessment - Waste-stream specific assessment	Error!
Bookmark not defined.	
VII.2 HKSAR: conclusions	Error! Bookmark not defined.
Annex VIII: India	101
VIII.1 Generic assessment	102
VIII.2 Waste-stream specific assessments	104
VIII.3 India: conclusions	112
Annex IX: Indonesia	114
IX.1 Generic assessment	114
IX.2 Waste-stream specific assessments	116
IX.3 Concerns raised by environmental non-governmental organisations	118
IX.4 Indonesia: conclusions	118
Annex X: Kazakhstan	120
X.1 Generic assessment – waste type specific assessment	120
X.2 Kazakhstan: conclusions	123
Annex XI: Lao PDR	124

XI.1 Generic assessment - Waste-stream specific assessment	124
XI.2 Lao PDR: conclusions	126
Annex XII: Malaysia	127
XII.1 Generic assessment	127
XII.2 Waste-stream specific assessments	130
XII.3 Concerns raised by environmental non-governmental organisations	134
XII.4 Malaysia: conclusions	134
Annex XIII: Mauritius	135
XIII.1 Generic assessment - Waste-stream specific assessment	135
XIII.2 Mauritius - conclusions	138
Annex XIV: Moldova	139
XIV.1 Generic assessment	139
XIV.2 Waste-stream specific assessments	142
XIV.3 Moldova: conclusions	143
Annex XV: Monaco	145
XV.1 Generic assessment	145
XV.2 Waste-stream specific assessments	147
XV.3 Monaco: conclusions	148
Annex XVI: Montenegro	149
XVI.1 Generic assessment	149
XVI.2 Waste-stream specific assessments	152
XVI.3 Montenegro: conclusions	154
Annex XVII: Morocco	155
XVII.1 Generic assessment	156
XVII.2 Waste-stream specific assessments	158
XVII.3 Morocco: conclusions	160
Annex XVIII: Nigeria	162
XVIII.1 Generic assessment	162
XVIII.2 Waste-stream specific assessments	164
XVIII.3 Nigeria: conclusions	165
Annex XIX: North Macedonia	167
XX.1 Generic assessment	167
XIX.2 Waste type specific assessment	170
XIX.3 North Macedonia: conclusions	170
Annex XX: Oman	171
XX.1 Generic assessment	171
XX.2 Waste-stream specific assessments	174
XX.3 Oman: conclusions	176

Annex XXI: Pakistan	177
XXI.1 Generic assessment.....	177
XXI.2 Waste-stream specific assessments	180
XXI.3 Pakistan: conclusions	184
Annex XXII: The Philippines	185
XXII.1 Generic assessment – waste stream specific assessment	185
XXII.2 The Philippines: conclusions	188
Annex XXIII: Saudi Arabia	189
XXIII.1 Generic assessment	189
XXIII.2 Waste-stream specific assessments	192
XXIII.3 Saudi Arabia: conclusions	195
Annex XXIV: Serbia	196
XXIV.1 Generic assessment.....	196
XXIV.2 Waste type specific assessment.....	198
XXIV.3 Serbia: conclusions.....	199
Annex XXV: Sri Lanka.....	201
XXV.1 Generic assessment	201
XXV.2 Waste-stream specific assessments.....	203
XXV.3 Sri Lanka: conclusions	207
Annex XXVI: Taiwan.....	208
XXVI.1 Generic assessment.....	208
XXVI.2 Waste-stream specific assessments	211
XXVI.3 Taiwan: conclusions	211
Annex XXVII: Thailand	212
XXVII.1 Generic assessment	212
XXVII.2 Waste-stream specific assessments.....	215
XXVII.3 Thailand: conclusions.....	217
Annex XXVIII: Togo.....	218
XXVIII.1 Generic assessment	218
XXVIII.2 Waste-stream specific assessments	220
XXVIII.3 Togo: conclusions	221
Annex XXIX: Tunisia.....	222
XXIX.1 Generic assessment.....	222
XXIX.2 Waste-stream specific assessments	224
XXIX.3 Tunisia: conclusions	228
Annex XXX: Ukraine	229
XXX.1 Generic assessment	229
XXX.2 Waste-stream specific assessments.....	231
XXX.3 Ukraine: conclusions	234

Annex XXXI: Vietnam	235
XXXI.1 Generic assessment	236
XXXI.2 Waste-stream specific assessments	238
XXXI.3 Concerns raised by environmental non-governmental organisations	239
XXXI.4 Viet Nam: conclusions	240

DRAFT

1. INTRODUCTION

Regulation (EU) 2024/1157 on shipments of waste (“Waste Shipment Regulation” or WSR)¹ provides a specific regime for the export of waste from the EU to third countries. The aim of this regime is that the EU takes greater responsibility for managing the waste it generates, and that this waste is only exported to countries and facilities where it will be managed in an environmentally sound manner in conditions that are *equivalent* to those applied in the EU (²).

The WSR’s export rules differentiate between countries to which the OECD Decision on the Transboundary Movements of Wastes (³) applies (‘OECD countries’), and third countries, to which the OECD Decision does not apply (‘non-OECD countries’). As OECD countries are subject to OECD rules and recommendations on the shipment and management of waste, they generally have higher waste management standards than non-OECD countries. Therefore, the new WSR establishes a stricter regime for exporting waste to non-OECD countries. The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal also contains different rules for shipments of waste to OECD and non-OECD countries.

The export of hazardous and certain other wastes from the EU to non-OECD third countries has been prohibited for many years already, and this continues to be the case under the WSR (Article 39).

The WSR introduces an additional prohibition on the export of *non-hazardous waste*, which will apply from 21 May 2027 (Article 40 WSR). However, as an exemption to this general prohibition, the export of non-hazardous waste from the EU will still be allowed to certain non-OECD third countries and territories which notify the European Commission of their willingness to receive waste from the EU and demonstrate their ability to treat this waste in an environmentally sustainable manner. These countries and territories will be included in the list established by the Commission (‘the list of countries’) (Article 41 WSR). It is important to stress that export of waste to these countries can only be authorised for waste destined to recovery operations (i.e. recycling or incineration with energy recovery).

Non-OECD countries or territories wishing to receive non-hazardous waste from EU Member States are required to submit a request to be included on the list of countries to which exports are authorised. The WSR states that such requests should be submitted by 21 February 2025.

¹ REGULATION (EU) 2024/1157 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 April 2024 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401157

(²) COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Our waste, our responsibility: Waste shipments in a clean and more circular economy - https://environment.ec.europa.eu/document/download/db51c0b2-cb54-44e7-ab42-22a966588b5f_en?filename=communication-proposal-for-a-new-regulation-on-waste-shipments.pdf

(³) <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0266>

The Commission is mandated to assess the country requests and then prepare, through a delegated act, the list of non-OECD countries to which exports of certain non-hazardous EU waste are authorised. The first list should be adopted by 21st November 2026.

The purpose of this document is to present the assessment by the Commission services of the requests received by third countries or territories wishing to receive waste exported from the EU.

2. ASSESSMENT PROCESS

30 countries and territories submitted a request before or shortly after 21 February 2025. Two countries submitted their requests a few months after that date (June-July 2025). Requests were received from Andorra, Bangladesh, Bosnia and Herzegovina, Egypt, El Salvador, Georgia, Hong Kong, India, Indonesia, Kazakhstan, Lao PDR, Malaysia, Mauritius, Moldova, Monaco, Montenegro, Morocco, Nigeria, North Macedonia, Oman, Pakistan, Philippines, Saudi Arabia, Serbia, Singapore, Sri Lanka, Taiwan ⁽⁴⁾, Thailand, Togo, Tunisia, Ukraine and Vietnam.

The Commission proceeded with the assessment of all these 32 submissions in view of establishing the list of countries by 21 November 2026.

2.1 Required information

Article 42 of the WSR sets out the requirements for inclusion on the list of non-OECD third countries to which exports are authorised. Annex VIII of the WSR provides the format for requests for inclusion on the list and details the information countries are required to provide in their requests. Annex IX provides additional points of reference on which the Commission can base its assessment of country requests.

The request and all related documents or other communications should be provided in English.

The request should be submitted using the form provided in Annex VIII of the new WSR and contain all the information specified therein. A [template with guiding notes](#) was made available via the Commission website ⁽⁵⁾.

The country should demonstrate that it has put in place and implemented all necessary measures to ensure that the waste will be managed in an environmentally sound manner, as referred to in Article 59 of the new WSR.

To this end, Article 42 provides that applicant countries are required to demonstrate that:

- a) They have a comprehensive waste management strategy or plan that covers their entire territory and shows their ability and readiness to ensure the environmentally sound management (ESM) of waste. This strategy or plan shall include at least the following elements:

⁽⁴⁾ The use of the term ‘country’ should not be interpreted as reflecting any official position of the European Union with regard to the legal status of Taiwan.

⁽⁵⁾ <https://webgate.ec.europa.eu/circabc-ewpp/ui/group/c04f478b-d4dc-44f9-a211-087c01165b2c/library/ad5fcfc7-5f5a-448e-9110-531fb414c674/details>

- (i) The annual quantity of total waste generated in the country, as well as the annual quantity of waste covered by the scope of its request ('waste concerned by the request') generated in the country, and how those quantities are estimated to develop in the next 10 years.
 - (ii) An estimate of the current treatment capacity for waste in general, as well as an estimate of the treatment capacity for the waste covered by the request, and how those capacities are estimated to develop in the following 10 years.
 - (iii) The proportion of domestic waste that is separately collected, as well as any objectives and measures to increase that proportion in the future.
 - (iv) An indication of the proportion of the domestic waste covered by the request which is landfilled, as well as any objectives and measures to decrease that proportion in the future.
 - (v) An indication of the proportion of the domestic waste covered by the request which is recycled, and possible objectives and measures to increase that proportion in the future.
 - (vi) Information on the quantity of waste which is littered and on measures taken to prevent and clean up litter.
 - (vii) Their strategy for ensuring the environmentally sound management (ESM) of waste imported into their territory, including the possible impact of such import on the management of waste generated domestically.
 - (viii) Information on the methodology used to calculate the data referred to in points (i) to (vi).
- b) They have a legal framework for waste management in place, with this framework including at least the following elements:
- (i) A permitting, licensing or registration system or systems for waste treatment facilities.
 - (ii) A permitting, licensing or registration system or systems for the transport of waste.
 - (iii) Provisions designed to ensure that the residual waste generated through the recovery operation for the wastes concerned by the request is managed in an environmentally sound manner as referred to in Article 59.
 - (iv) Adequate pollution controls applying to waste management operations, including emission limits for the protection of air, soil and water and measures to reduce the emissions of greenhouse gases from those operations.
 - (v) Provisions on enforcement, inspection and penalties designed to ensure the implementation of domestic and international requirements on waste management and shipment of waste.

- c) They are a Party to the multilateral environmental agreements referred to in Annex VIII and have taken the necessary measures to implement their obligations under those agreements.
- d) They have put in place a strategy for enforcement of domestic legislation on waste management and shipment of waste, covering control and monitoring measures, including information on the number of inspections of shipments of waste and of waste management facilities carried out and on penalties imposed in the event of infringements of the relevant domestic rules.

Annex VIII also requires 3rd countries to provide the following further information regarding the wastes covered by the request:

- A description of the non-hazardous wastes or mixtures of non-hazardous wastes for which a request to import is being made, along with the accompanying waste identification code for each waste type described.
- Whether the waste(s) is/are listed in Annex IX of the Basel Convention, and if this is the case whether the procedure of prior written notification and consent should apply.
- A list of facilities that are authorised under the applicant country's domestic legislation to recover the waste(s) concerned by the request, including information on the name, address and permit number of the facility, the types of non-hazardous wastes or mixtures of non-hazardous wastes the facility is permitted to recover, and the facility's authorised treatment facility. This information should preferably be provided through a link to a website where information on the facilities concerned is publicly available and electronically accessible (e.g., on the website of the relevant national competent authority).
- A description of how the Framework for the environmentally sound management (ESM) of hazardous waste and other wastes, technical guidelines and other guidance on the ESM of waste adopted under the Basel Convention are taken into consideration in the applicant country's regime for the management of the waste concerned by the request.

2.2 Assessment approach

The assessment of the applications of non-OECD third countries is based on Article 43 of the WSR.

To this end, the Commission pursued a step-by-step approach, which follows the structure of the Annex VIII request form. It relies on the information provided by the applicant countries (see section 2.1), as well as other supporting information and data, where it was available. The aim of the assessment is to verify if the request provides satisfactory evidence that the applicant country's waste management regime meets standards necessary to ensure the environmentally sound management of the waste for which the application is being made.

The concept of '**environmentally sound management**' or '**ESM**' is central to the assessment. Article 59 of the WSR states that a waste is managed in an environmentally sound manner if it can be demonstrated that it is managed in accordance with human health, climate and environmental protection requirements considered **equivalent** to those under EU legislation. While full compliance with EU legislation is not required, the requirements put in place in the destination country must ensure a similar level of protection of human health and the environment compared to EU requirements.

In that respect, Annex IX of the new WSR lists relevant EU legislation and international guidance that shall serve as points of reference in making the equivalence assessment.

The Commission identified provisions and targets stemming from the EU legislation mentioned in Annex IX of the WSR, which can be considered as “benchmarks” to define what constitutes “environmentally sound management of waste” in the EU, as well as international commitments relevant for ESM and protection of the environment and human health more generally.

The most important benchmarks under EU law for ensuring the environmentally sound management of waste were identified by the Commission as follows:

- General provisions on the basic principles that guide waste management, especially on the waste hierarchy, the adoption of waste management plans, measures to address littering, targets for separate collection and recycling, stemming from the Waste Framework Directive and other relevant EU waste legislation;
- Requirements aimed at ensuring proper management of residual waste, i.e. waste which does not get recycled during the treatment process and needs to be adequately managed via other subsequent treatment methods (typically incineration with or without energy recovery or sanitary landfills), as per EU waste legislation;
- Permitting requirements set out in the Waste Framework Directive (WFD), Landfill Directive and Industrial Emissions Directive (IED);
- Specific provisions designed to ensure the protection of air, soil and water for industrial facilities which are processing waste (such as the emission limits stemming from the IED and decisions on Best Available Techniques conclusions applying to key pollutants, in particular dust, heavy metals, dioxins and furans, SO₂, NO_x);
- Requirements concerning enforcement of the legislation, especially regular inspections and effective sanctions for breaching applicable legislation, stemming from EU waste and general environmental legislation.

On this basis, the Commission considered the following main areas for its assessment:

- (i) ***Assessment of the waste management situation in the countries concerned, with particular focus on the impact of imported waste***

For this element, the objective of the assessment was to:

- a. verify that the information provides an accurate description of (i) the situation on waste generation, collection and management in the countries

- concerned (including the method used to collect and validate data) and (ii) the likely impact of the import of waste from the EU on this situation;
- b. ensure that the countries concerned have established an overall policy and dedicated measures to ensure the environmentally sound management of waste, in particular taking into accounts imported waste.

The assessment is based on the completeness and consistency of the information provided by the countries concerned, and stemming from other sources, where available. The assessment thereby also took into consideration the overall EU policy and legislation to improve waste management, to assess equivalence.

(ii) Assessment of the domestic legal framework

For this element, the evaluation considered whether sufficient information was provided by third countries relating to their domestic legal framework, as well as a comparison with the most important benchmarks under EU law for ensuring the environmentally sound management of waste identified above.

The assessment considers both the management of waste in the countries concerned in a generic manner and specifically considers the types of waste that the country wishes to import from the EU.

(iii) Assessment of strategy and measures in place to implement and enforce the domestic legislation on waste management

For this element, the objective of the assessment was to verify that the country concerned has put in place a robust policy to ensure that its domestic legislation on the environmental sound management of its waste is properly implemented and enforced.

While the information pertaining to the overall EU policy and legislation designed to ensure a proper implementation/enforcement of EU waste legislation were considered as part of this assessment, the assessment focussed in the first place on a qualitative evaluation of the elements provided in the applications by the 3rd countries and stemming from other sources, where available.

Again, the assessment considers both the management of waste in the countries concerned in a generic manner and specifically considers the types of waste that the country wishes to import from the EU.

(iv) Ratification and implementation of multilateral environmental agreements

For this element, the assessment focused on the status of the ratification of the multilateral environmental agreements referred to in Annex VIII of the WSR, as well how the country concerned has been complying with its basic obligation under these agreements, especially reporting obligations.

2.3 Evaluation of ferrous and non-ferrous metal waste

The requests received from third countries relating to metal waste streams, including metal fractions from construction materials, from end-of-life vehicles or from waste electric or electronic equipment, waste cables, waste batteries and spent catalyst, required particular

scrutiny. It is essential that the conditions under which metal waste can be authorised for export from the EU to non-OECD countries are evaluated carefully, in line with the WSR, and in view of the environmental challenges linked to their treatment which are key for the transition to a circular economy and decarbonisation of the EU industry.

Ferrous and non-ferrous metal waste can present a higher hazard profile than other waste streams due to their potential content of persistent and toxic heavy metals such as lead, mercury, cadmium and hexavalent chromium. Unlike many other materials, metal elements are non-degradable and remain environmentally active indefinitely, with the potential for bioaccumulation and long-term ecological and human health damage.

Importantly, the treatment process of metallic materials is associated with specific hazards which, if improperly managed, may result in irreversible environmental degradation. Metallurgical treatment processes, such as shredding, smelting and refining are energy and chemically intensive and can generate significant emissions of fine dust, fumes and contaminated residues. The pollutants released by smelting include sulphur dioxide, nitrogen oxides, carbon monoxide and volatile organic compounds. The high temperatures required for smelting scrap metal demand high energy consumption, often leading to high carbon emissions if powered by fossil fuels. The hydrometallurgical refining of metals involves the use of strong acids, alkalis and organic solvents which require careful disposal or recovery.

Moreover, the management of residual waste is challenging as the treatment process may produce slags, filter dusts and water sludges containing persistent metals, which may contaminate air, soil and groundwater. The remaining residue (fluff) from shredding contains other mixed materials that are often difficult to recover. The chemical refining process generates wastewater that can contain dissolved heavy metals and acids requiring extensive treatment.

Considering the inherent properties of metals and the challenges linked to the treatment of metal waste, the EU has developed a robust legislative framework to ensure the environmentally sound management of metal waste, scraps and slags with strict pollution and emissions controls as well as mandatory permitting and technical requirements.

The Industrial and Livestock Rearing Emissions Directive (IED, revised in 2024)⁶ requires larger facilities (with defined treatment capacities in tonnes/day) to obtain a permit based on Best Available Techniques (BAT) for emission abatement, such as dust, heavy metal capture and wastewater treatment, and establishes strict emission limit values for discharge of pollutant outputs into air, water and soil. It obliges the industries to prevent or reduce waste generation and maximize reuse, recycling, and recovery of slags, dusts and filter residues. It also implements, in many cases, continuous monitoring of emissions and regular maintenance of pollution-control equipment. The revised IED reinforced BAT-based permitting introduced resource-efficiency requirements for energy, water, and materials, and increased emphasis on the circular economy, including waste prevention. Smaller metal treatment facilities are not subject to the IED but must follow strict environmental measures under the Waste Framework Directive (WFD)⁷.

⁶ <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:02010L0075-20240804%20>

⁷ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0098-20251016&qid=1783348720938>

The shipment of metal waste streams should therefore be thoroughly monitored due to their hazard potential and environmental concerns. An assessment per applicant country is presented in Section 3 and in the Annexes for the requested waste streams, including for metal waste (when requested by the country).

3. ASSESSMENT OF COUNTRIES AND TERRITORIES THAT REQUESTED INCLUSION IN THE LIST OF COUNTRIES

This section contains, for each of the 32 countries concerned, the conclusion of the assessment, performed on the basis of the approach described above, on whether a country can be included in the list of countries. The Annexes of this document provide a more detailed assessment on the extent to which the respective requests meet the criteria for the inclusion in the list.

Based on the 32 applications submitted, the assessment concluded that:

- **10 countries could be** included in the list of non-OECD countries to which exports are authorised for most of the requested waste streams as they have demonstrated waste management conditions equivalent to EU standards (Andorra, Moldova, Monaco, Montenegro, North Macedonia, Philippines, Serbia, Sri Lanka, Taiwan, Ukraine) but follow-up is needed on a number of points for some of them.
- **15 countries could be** included (Bangladesh, Bosnia and Herzegovina, Egypt, Georgia, India, Indonesia, Malaysia, Mauritius, Morocco, Oman, Pakistan, Saudi Arabia, Thailand, Tunisia, Viet Nam) for part of the requested waste streams as their waste management strategies are overall satisfactory. However, the assessment indicates that improvements are needed to ensure that waste is managed in conditions equivalent to EU standards. This will be taken into account at the next review of the list of non-OECD countries to which exports are authorised, pursuant to Article 41(4) of Regulation (EU) 2024/1157. The assessment highlighted the additional information that these countries should submit to demonstrate that all measures have been implemented to ensure environmentally sound waste management.
- **5 countries could not** be recommended for inclusion as they failed to demonstrate the environmentally sound management of the requested waste streams (El Salvador, Kazakhstan, Lao PDR, Nigeria, Togo).
- **Hong Kong could not** be recommended for inclusion as it did not demonstrate all specific requirements for the environmentally sound management of metal waste, being the only requested waste stream.
- **Singapore cannot** be included as it only applied for hazardous waste (Lithium-ion batteries, considered as hazardous waste under EU law from 9 November 2026). Pursuant to Article 39(1) of Regulation (EU) 2024/1157, the export of hazardous waste is prohibited from the EU to non-OECD countries.

3.1 Andorra

Andorra submitted its application on 2 July 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Andorra to provide additional information. Andorra provided such information on 9 October 2025.

The application submitted by Andorra covered one specific type of waste, eligible under Title IV of the WSR. This waste is not covered by a particular Basel waste entry but is covered by a code under the EU List of Waste, namely 19 12 12: Waste (including mixtures of materials) from mechanical processing of waste other than specified in code 19 12 11. It concerns the residual fraction (non-recyclable materials) resulting from the pre-treatment of non-hazardous municipal waste. The waste is intended to be imported into Andorra for energy recovery at one specific energy recovery plant.

Andorra's application provides a clear description of its waste management strategy and legal framework, which is equivalent to EU legislation, as well as of its implementation and enforcement. Andorra can be assessed as sufficiently committing to the relevant international agreements.

A more detailed assessment of Andorra's request can be found in Annex I.

As a result of this assessment, Andorra could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for the waste covered by its request.

3.2 Bangladesh

Bangladesh submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Bangladesh to provide additional information. Bangladesh provided more information on 29 November 2025 and 19 January 2026.

The application of Bangladesh referred to several waste codes that concern hazardous waste:

- A1160: lead acid battery scrap;
- A1120: waste and scrap of metal clad with precious metal other than gold, platinum and ash;
- A1150: PCB ash for precious metal;
- A1110: spent electrolyte from copper electrorefining;
- A1010/A1020: tellurium metallic waste and powder.

The application of Bangladesh also referred to waste batteries under Basel entry B1090. Whereas this entry in principle covers non-hazardous waste batteries, the application explicitly refers to "end-of-life lithium-ion cells/batteries" with customs code 85481090. Such waste is classified under the European List of Waste with specific hazardous codes,

notably 16 06 07* (waste lithium-based batteries) and 20 01 43* (separately collected municipal waste lithium-based batteries) due to fire and explosion risks.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes above are therefore not eligible for the inclusion in the list of countries to which the export of waste from the EU could be authorised (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes have therefore not been considered in the assessment of the application of Bangladesh.

The application of Bangladesh also includes electrical and electronic waste that could be classified under the code B1110. The entry B1110 was effective only until 31 December 2024 and, from 1 January 2025, non-hazardous electrical and electronic waste is to be classified under the Basel entry Y49. The European Commission assumes that the application of Bangladesh may be interpreted as covering non-hazardous electrical and electronic waste classified under code Y49. According to Article 39(1) point (c) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste will not be considered when assessing the application of Bangladesh.

The application submitted by Bangladesh covers 4 types of waste, eligible under Title IV of the WSR, namely ferrous metal waste, non-ferrous metal waste, paper waste and rubber waste.

The application of Bangladesh provided data on the waste management situation in the country. It did not explain how the provided data regarding the annual quantity of waste generation were calculated or validated. Furthermore, Bangladesh' application provides general information regarding its legal framework for waste management and environmental protection, but at the same time provides insufficient elements demonstrating that the country will be able to manage waste in an environmentally sound manner in conditions equivalent to the EU's. In particular, the following remains a point of attention: whereas dumping is prohibited by law, the information provided in the application mentioned "dumping" as a method to manage residual waste, which cannot be considered as environmentally sound.

Sufficient information is lacking to consider the policies and measures to monitor and mitigate environmental pollution linked to the treatment of the waste concerned by the request as demonstrating equivalence with EU conditions. For example, the application by Bangladesh did not provide any information on potential emission limit values applying to relevant waste management and industrial activities that should be monitored for important parameters, namely heavy metals, dust, dioxins and furans, NO_x, SO₂.

In addition, for ferrous metal waste, the management of residual waste and the incomplete implementation of pollution control measures during treatment raise concern. While Bangladesh has some basic controls in place, the framework does not fully cover key landfill safeguards, site verification and record-keeping requirements, or a comprehensive application of best available techniques. The application also lacks sufficient evidence on technical measures related to emissions control, energy efficiency, material recovery, wastewater management, and the handling and pretreatment of scrap.

For waste batteries and catalysts, the assessment indicates deficiencies relate to the absence of specific treatment and storage requirements, insufficient evidence on measures to

prevent hazardous emissions, and missing safeguards for the safe handling of mercury, cadmium, lithium, acids, and other hazardous components.

Bangladesh's application should further elaborate a list of relevant treatment facilities. While Bangladesh is making efforts to enhance data collection and build a national inventory for such facilities, for all wastes concerned by the request, the application by Bangladesh stated that this information is currently unavailable. The country does not have a centralised database for recovery facilities and data fragmentation exists. Moreover, small Bangladeshi recovery facilities often operate without registration or documentation.

Finally, information is missing to assess if Bangladesh sufficiently complies with the relevant international agreements mentioned in the WSR.

A more detailed assessment of Bangladesh' request can be found in Annex II.

As a result of this assessment, Bangladesh

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste and rubber waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for waste batteries, ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Bangladesh to further elaborate the following elements:

- Provide additional information and evidence on the legal framework for landfill management, including detailed landfill acceptance criteria, operator competence, financial security requirements, and comprehensive emission limits for all relevant pollutants. The information should demonstrate detailed closure and after-care obligations, robust on-site verification and gate checks, comprehensive record-keeping, mandatory notification of authorities in case of non-compliance, an explicit ban on landfilling waste intended for reuse or recycling, and a prohibition on dilution or mixing of waste.
- Demonstrate the implementation of best available techniques (BATs) for pollution control, especially for hazardous and residual waste treatment, and wastewater management.
- Improve data transparency and methodology: clearly document methodologies for waste quantity calculations, future projections and management of imported waste, and provide evidence that imported waste will be managed to standards equivalent to those in the EU, including robust monitoring and reporting systems.
- Provide additional information on permitted facilities: include full details for authorized recovery facilities, such as addresses, permit numbers, treatment capacities, and types of waste treated.
- Incorporate detailed occupational health and safety measures for waste management operations and specify prohibited waste types and handling protocols.

The information on metal waste streams should also address the following:

- Methodology for calculating the proportion of metal waste generated, collected, landfilled and recycled.
- Evidence of requirements for shredder feed stability to enhance energy efficiency and requirements for separation techniques to increase the recovery of secondary materials as well as energy use in secondary copper production.
- Implementation of robust process control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and to improve recovery rates, including during scrap pretreatment.
- Specific emission limits for harmful contaminants such as heavy metals (cadmium, lead, mercury), polychlorinated dibenzodioxins/furans (PCDD/F), hydrogen fluoride (HF) and nitrogen oxides (NO_x).

The Commission intends to reevaluate the inclusion of Bangladesh into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.3 Bosnia and Herzegovina

Bosnia and Herzegovina submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Bosnia and Herzegovina to provide additional information. Bosnia and Herzegovina provided such information on 7 October 2025. Following a second request for additional information from the Commission, Bosnia and Herzegovina shared additional information on 19 January.

Bosnia and Herzegovina submitted an application to import six types of waste, eligible under Title IV of the WSR, namely ferrous metal waste, non-ferrous metal waste, paper waste, rubber waste, refuse-derived fuels (RDF) and textile waste.

The application indicates that landfilling is the predominant method of waste disposal in the country, that there are many abandoned landfills and illegal dumpsites and there are no official data on the amount of waste subject to the request which is recycled. This information raises concerns on the ability of Bosnia and Herzegovina to manage waste in an environmentally sound manner, despite the fact that the application also indicates that there are several initiatives to improve the waste management situation in the country and that waste intended to be imported are only destined to facilities permitted to process such waste where there is no domestic waste available.

Bosnia and Herzegovina's application provided general information regarding its legal framework for waste management and environmental protection. Most of this information is of a general nature and does not allow to conclude if the legal framework is equivalent to the EU standards designed to ensure an environmentally sound management of waste.

Especially, the application lacks details to assess equivalence with EU benchmarks on the management and treatment of the specific waste streams concerned by the request, and

their residual wastes, as well as the related pollution controls and emission limits applied. In particular, the information provided shows that there are conditions linked to pollution control measures which are enshrined in the permits of individual facilities. The application indicated that emission limit values apply to industrial facilities processing waste (i.e. recycling facilities or facilities using waste to produce energy or heat, such as incinerators or cement kilns) for a number of relevant pollutants, including dust, SO₂, NO_x, heavy metals, dioxins and furans, but the levels of these emission limits are not provided. In addition, there is no mention of emission limits for other substances such as total organic carbon (TOC), total volatile organic compounds (TVOC), hydrogen chloride (HCl), hydrogen fluoride (HF).

More specifically for ferrous and non-ferrous metal waste, the application does not clearly demonstrate the measures to control and limit pollution during treatment, beyond general requirements on waste handling, transport and dust prevention, and it does not sufficiently identify the relevant pollutants to be monitored for metal treatment activities. For non-ferrous metal waste, the assessment shows the absence of detailed legal requirements or techniques for preventing diffuse emissions during scrap pre-treatment and for reducing environmental risks during storage.

The application contains information on enforcement of the legislation relevant for the shipment and management of waste. However, the application also recognises that there is currently no consolidated data on the number of inspections carried out and penalties imposed in cases of breaches of the legal framework designed to ensure the environmentally sound management of waste.

The application contains a list of facilities authorised to treat the waste subject to the request.

It is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

A more detailed assessment of Bosnia and Herzegovina's request can be found in Annex III.

As a result of this assessment, Bosnia and Herzegovina

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, rubber waste, refuse-derived fuel and textile waste
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Bosnia and Herzegovina to further elaborate on the following elements:

- Provide a complete and up-to-date list of all authorised waste treatment facilities.

- Provide 10-year projections for waste generation, waste treatment capacity and recycling rates, supported by robust calculation methodologies and data sources.
- Elaborate on the permit requirements for waste treatment facilities, including incineration plants: ash characterization, temperature control, organic carbon limits in bottom ash content, etc.
- Specify the emission limits and pollution control measures applied at treatment facilities for all relevant pollutants, including total organic carbon (TOC) and total volatile organic compounds (TVOC), hydrogen chloride (HCl), hydrogen fluoride (HF), and sulphur dioxide (SO₂).

The information on metal waste streams should also address the following:

- 10-year projections on the amount of metal waste that will be generated in the country.
- 10-year projections of the country's treatment capacity for metal waste.
- Proportion of domestic metal waste that is recycled,
- For all calculations, provide robust data sources and methodologies.
- Scrap quality control measures to minimise pollutants and improve recovery.

The Commission intends to reevaluate the inclusion of Bosnia and Herzegovina into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.4 Egypt

Egypt submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Egypt to provide additional information. Egypt provided such information on 30 September 2025 and 8 January 2026.

The application of Egypt referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Egypt.

Further, the following waste was indicated in the application of Egypt: “Slaughterhouse waste (Leather, intestines, wool, bones, horns, hooves, fur, hair...) - Subject to the veterinary quarantine codes and/or standards in the country of origin and the country of import.” This material is considered under the applicable legislation concerning animal by-products and is not covered by the EU rules on waste shipments. Trade in animal by-products obtained in slaughterhouses is subject to animal health rules. The EU legislation

on animal by-products ⁽⁸⁾ lays down public health and animal health rules for animal by-products to prevent and minimise risk to public and animal health arising from those products.

The application also covers ferrous metal waste, non-ferrous metal waste, paper waste, textile waste, rubber waste, wood waste, glass waste and organic and agro-food waste.

Egypt's application contains information regarding its waste management system, the waste generated and managed in the country, how imports would affect the domestic waste system, as well as how relevant data regarding the waste management situation in the country are collected and validated. Sufficient information is however lacking to fully demonstrate the robustness of the national waste management framework.

The general waste management context in Egypt is characterized by widespread use of landfilling and the prevalence of open dumpsites.

Information is especially insufficient with regard to pollution controls applicable to facilities processing the waste concerned by the request, as well as the residual waste from such processing. In that respect, the application of Egypt did not provide any information on potential emission limit values that should be monitored for important parameters, such as heavy metals, dust, dioxins and furans, NO_x, sulphur.

The application contains information about the implementation and enforcement of the legal requirements applicable to waste management. However, the application does not provide evidence (such as statistics) that it has practically implemented the measures on inspections contained in its domestic legislation. The application does not provide specific data on the number or size of penalties imposed for violations related to waste shipments and management.

In addition, for ferrous and non-ferrous metal waste, the application does not sufficiently demonstrate that adequate controls are in place. This concern in particular waste storage and transfer procedures, scrap quality, inspection and sorting, especially in relation to air emissions.

The application identified authorised treatment facilities by name, address, permit number, and waste type.

Egypt fulfils its relevant international commitments, indicating that it is intending to ratify the Minamata Convention on mercury in 2026.

A more detailed assessment of Egypt's request can be found in Annex IV.

As a result of this assessment, Egypt

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, textile waste, rubber waste, wood waste, glass waste and organic and agro-food waste;

⁽⁸⁾ Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC ([OJ L 229, 1.9.2009, p. 1](#)).

- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Egypt to further elaborate on the following elements:

- For each waste stream requested, provide the amounts and 10-year projections of waste generation, treatment capacity, recycling, landfilling and imports/exports. Document the data sources and methodology for calculating the quantities and projections.
- Provide a complete and up-to-date list of all authorised waste treatment facilities, including addresses, permit numbers, treatment capacities and types of waste treated.
- Regarding the permitting, licensing or registration system of waste treatment facilities: Egypt should provide information on permit content and requirements in relation to emission limits, soil and groundwater protection, monitoring, reporting, maintenance, operator competence, compliance assessment, hazardous substance management, and financial security. On landfilling, Egypt should indicate whether there is a prohibition of landfilling for separately collected waste as well as prohibition on waste dilution or mixing. Egypt should also prove that analysis and accredited laboratory testing are required for all landfilled waste. The information should cover landfill acceptance criteria and operational details for landfills.

The information on metal waste streams should also address the following:

- Egypt should demonstrate that the country has pollution controls in place when treating the metal waste in terms of energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls. Additionally, Egypt should provide information on established emission limits and controls on critical substances (e.g. cadmium, mercury, lead, PCDD/F, NO_x, sulphur dioxide).

The Commission intends to reevaluate the inclusion of Egypt into the list of countries to which export of waste from the EU is authorised, based on an assessment of the additional information provided and progress made on these points to ensure the environmentally sound management of waste.

3.5 El Salvador

El Salvador submitted its application on 20 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited El Salvador to provide additional information. El Salvador provided such information on 17 September 2025. Following a second request for additional information from the Commission, El Salvador shared additional information on 10 January.

El Salvador submitted an application to import paper waste.

The application provided general information regarding El Salvador's national waste management strategy, e.g., estimates of paper waste generated, the proportion of paper

waste landfilled, and an overview of existing waste management infrastructure. It also listed relevant domestic legal frameworks, describes its approach to authorisations and permits, and confirms ratification of key multilateral agreements such as the Basel Convention. Some aspects, such as the requirements for importers and the regulatory framework for transport and environmental protection, are addressed in detail.

However, the application lacked critical information required for a full assessment. It does not provide projections for future waste generation, comprehensive data on waste treatment and recycling capacities, or a complete list of authorised treatment facilities with their capacities. There is no explicit mention of comprehensive air pollution legislation, such as regulations on ambient air quality, pollutant emission limits, or monitoring requirements. Furthermore, there is no reference to comprehensive soil protection legislation, such as regulations on soil quality standards, remediation of contaminated sites, or monitoring programs.

The information provided on the enforcement strategy for domestic legislation, specific pollution control measures, and the permitting process for waste recovery projects are insufficient. The application did not clarify whether there is a set frequency for periodic monitoring by the competent authority, nor did it detail the existence of a structured and systematic environmental inspection system. The application does not provide concrete data or specific case examples of penalty application, such as the number or types of sanctions imposed. Furthermore, the application failed to present substantive information on broader environmental protection policies and does not include all required data to demonstrate the technical and regulatory readiness of El Salvador for managing imported waste.

El Salvador has ratified the Basel Convention and all other relevant multilateral agreements, except for the Paris Agreement (to which El Salvador is a signatory however). The application did not explain why the country has not ratified the Paris Agreement, whether it plans to ratify it in the future, nor whether it is implementing its provisions.

A more detailed assessment of El Salvador's request can be found in Annex V.

As a result of this assessment, El Salvador could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.6 Georgia

Georgia submitted its application on 13 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Georgia to provide additional information. Georgia provided such information on 29 September 2025. Following a second request for additional information from the Commission, Georgia shared additional information on 13 January 2026.

The application submitted by Georgia covered 8 types of waste, eligible under Title IV of the WSR: ferrous metal, non-ferrous metal, paper, wood, textile, organic and agro-food, mineral, and glass waste.

The application contains information on the applicable waste management and environmental legal framework and on the policies and measures in place to monitor and mitigate environmental pollution. It however lacks information such as estimates of the annual quantity of waste concerned by the request generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity for the waste concerned by the request, and the proportion of domestic waste concerned by the request that is recycled.

More information concerning its domestic legal framework, and in particular provisions to treat residual waste in an environmentally sound manner, and pollution controls for waste treatment would be needed to conclude on equivalence. The application included no explicit mention to periodic permit review, nor to obligations that demonstrate technically competent management, provisions for financial guarantees for closure and after-care, or mandatory pre-operational inspection prior to commencing disposal activities. More information on quantitative emission limit values for the treatment of waste should be provided, and it should be ensured that all relevant pollutants are explicitly covered.

More specifically no quantitative emission limit values for the treatment of ferrous and non-ferrous metal waste are provided, and several relevant pollutants are not explicitly covered, resulting in an overall low level of technical and environmental control. It also lacks detail on certain technical pollution-control and process-control measures for metal treatment operations, including stable shredder feed linked to energy efficiency and related energy-efficiency planning requirements.

The application provides a broad overview of Georgia's waste management framework, including partial information on national objectives, landfill reduction measures, litter prevention, waste imports, and compliance with international obligations. Georgia demonstrated alignment with the Basel Convention, provided clear rules on waste shipment procedures, and presented a structured system for permitting, registration, inspections, and sanctions. For all waste streams, the country identified authorised treatment facilities with relevant permit details, and its legal framework generally covers permitting, closure and after-care, wastewater treatment, and basic pollution prevention measures.

A more detailed assessment of Georgia's request can be found in Annex VI.

As a result of this assessment, Georgia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper, wood, textile, organic and agro-food, mineral, and glass waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Georgia to further elaborate on the following elements:

- Regarding the permitting, licensing or registration system for waste treatment facilities: for landfills Georgia should provide information on periodic permit

review, , provisions for financial guarantees for closure and after-care, and mandatory pre-operational inspection prior to commencing disposal activities.

- Regarding the provisions designed to ensure that the residual waste generated through the recovery operation for the metal waste is managed in an environmentally sound manner: Georgia should indicate if it prohibits the landfilling of separately collected waste intended for reuse or recycling, and bans the dilution or mixing of waste. Georgia should provide information on requirements for continuous operational monitoring of landfills, annual compliance testing and limits for co-disposal of waste.
- Regarding pollution controls applying to each waste treatment operations, Georgia should elaborate on the emission limits, monitoring requirements, and best available techniques.

The information on metal waste streams should also address the following:

- Estimate of the annual quantity of metal waste generated in the country, information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity for the metal waste, and proportion of domestic metal that is recycled. Provide the methodologies and data sources for calculating the quantities and projections.
- Evidence of requirements for stable shredder feed to enhance energy efficiency and requirements for separation techniques to increase the recovery of secondary materials.
- Requirements to establish energy efficiency plans and maintain energy balance records.
- Implementation of robust process control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Specific emission limits for harmful contaminants such as heavy metals, polychlorinated dibenzodioxins/furans (PCDD/F) and hydrogen fluoride (HF).

The Commission intends to reevaluate the inclusion of Georgia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.7 Hong Kong Special Administrative Region (HKSAR)

HKSAR submitted its application on 12 May 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Hong Kong to provide additional information. HKSAR provided more information on 3 September and 23 December 2025.

HKSAR submitted an application to import ferrous and non-ferrous metal waste, which is destined to a single facility.

Although HKSAR has an acceptable domestic legal framework for environmental protection, waste management and waste shipment, the application did not demonstrate that all key pollutants for the treatment of metal waste will be controlled, notably total organic carbon (TOC), chemical oxygen demand (COD), and total volatile organic

compounds (TVOC). It was thus not demonstrated that the facility will use all BATs. Moreover, the facility which should receive the metal waste is not yet operational and has not yet received a permit. Considering the high hazard profile of metals and metallurgical treatment, the Commission is not yet able to conclude that metal waste will be managed in an environmentally sound manner in HKSAR.

A more detailed assessment of HKSAR's request can be found in Annex VII.

As a result of this assessment, HKSAR could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

In addition, the Commission services recommend the authorities from Hong Kong to consider further elaborating on the following elements:

- Regarding the permitting, licensing or registration system for waste treatment facilities, HKSAR should demonstrate that permits explicitly include conditions on definitive closure, particularly regarding the removal, control, or containment of hazardous substances.
- Regarding provisions designed to ensure that the residual waste generated through the recovery operation for the metal waste is managed in an environmentally sound manner, HKSAR should provide information on landfill waste acceptance criteria, documentation and inspection systems at landfill gates, bans on landfilling separately collected recyclable waste, landfill closure and after-care rules, and annual compliance testing.
- Regarding pollution controls applying to waste treatment operations, HKSAR should provide information on measures addressing key pollutants for the treatment of ferrous and non-ferrous metal waste, notably total organic carbon (TOC), chemical oxygen demand (COD), and total volatile organic compounds (TVOC).

3.8 India

India submitted its application on 17 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited India to provide additional information. India provided such information on 21 November 2025. Following a second request for additional information from the Commission, India shared additional information on 13 January 2026.

The application of India referred to several waste codes that concern hazardous waste. Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes concerned (A-list of Annex VIII of the Basel Convention, as well as mentioned OECD codes for various hazardous wastes) are therefore not eligible for the inclusion in the list of countries which could be authorised to export waste to the EU (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes were therefore not considered when assessing the application of India.

The application of India also referred to electrical and electronic waste that could be classified under the codes B1110, GC010, GC020. These codes are no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application of India further referred to household waste that could be classified under the codes Y46 or Y47. According to Article 39(1) point (c) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application of India furthermore referred to non-hazardous plastic waste classified under codes Y48, B3010 and B3011. According to Article 39(1) points (c) and (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application submitted by India covers ferrous and non-ferrous metal waste, waste batteries, paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, acidic waste, paint, dyes and inks, and vessels and floating structures.

The application of India contains data on the total annual waste generation and waste treatment capacities, based on a uniform national methodology. However, this data does not cover some waste streams covered by the request from India. Moreover, the application lacks data on separately collected waste, both quantitative and qualitative, and on landfilled waste, with the only exception being textile waste. On littering, India stated that dumping is prohibited, and that littered waste is equal to zero, but it did not provide any evidence to support such claim and information on measures to prevent littering. Information is provided on imported waste quantities for the waste streams concerned and on strategies to ensure environmentally sound management of such imports.

Overall, the application lacks sufficient information to fully demonstrate the robustness of the national waste-management framework. The application contained sufficient information regarding overall waste generation and waste treatment capacities in the country in general. However, the application did not provide information on how the total treatment capacity is estimated to evolve over the next decade. It also contained limited information regarding separate collection and recycling of domestic waste. It did not supply the overall proportion of domestically generated waste that is separately collected, nor the proportion separately collected for each major waste stream, and it did not outline any objectives or measures aimed at increasing the rate of separately collected waste. It did not outline any objectives or measures aimed at reducing the rate of landfilled waste, nor to increase the rate of recycled waste in the future.

India overall fulfils its relevant international commitments.

The application outlined key elements of the domestic legal framework for waste management, including registration and record-keeping obligations, monitoring and inspection systems, and broader environmental legislation addressing air, water, but not soil pollution. It also described, at a general level, the institutional powers and practices for enforcement of waste management and shipment legislation. However, for authorised recovery facilities, only aggregated data are provided, without facility-level details on

permits or waste types treated. Crucially, detailed pollution control and emission management measures are missing. Enforcement information remains largely descriptive, as no concrete evidence or statistics are supplied to demonstrate inspections, shipment checks, or penalties in practice.

For ferrous and non ferrous waste, India's application insufficiently demonstrates that pollution controls apply to treatment operations. There is no comprehensive regulatory coverage of air emissions reduction for heavy metals, dust, dioxins and furans and PCBs, nor detailed requirements for wastewater treatment stages based on best available techniques. The regulatory framework lacks key provisions covering energy efficiency, including requirements for a stable shredder feed, energy efficiency plans, and energy balance records. Finally, not all key pollutants related to these waste streams are mentioned.

A more detailed assessment of India's request can be found in Annex VIII.

As a result of this assessment, India

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, acidic waste as well as paint, dyes and inks.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for waste batteries, ferrous and non-ferrous metal waste, composite packaging consisting of mainly paper and plastic, not containing residues (BEU04), waste from pre-treatment of composite packaging (B3026), and vessels and floating structures.

In addition, the Commission services emphasise the need for the authorities from India to further elaborate the following elements:

- Quantitative and verifiable data on national treatment capacity, separately collected waste and landfilled waste for each type of waste India intends to import from the EU, with 10-year projections.
- Environmental measures taken under the national waste management framework, especially regarding separate collection and recycling of domestic waste, as well as any measure aimed at reducing the rate of landfilled waste in the future.
- Regulatory requirements governing residual waste management: provisions on bans on waste dilution or mixing, landfill acceptance criteria, requirements for detailed waste characterisation and testing, annual compliance testing, and limits for co-disposal of waste.
- Pollution control and emission management policies, including detailed description of the emission limits, monitoring requirements, and best available techniques applied for each waste treatment, incineration, and co-incineration facilities;
- Regarding the permitting and licensing system: conditions governing permit issuance such as site suitability, financial security for closure and after-care, mandatory pre-operational inspections, and detailed landfill-specific permit content requirements.

The information on metal waste streams should also address the following:

- 10-year projection of the treatment capacity for ferrous and non-ferrous metal waste together with a methodology used for forecasting.
- data on the share of domestic metal waste concerned by the request that is landfilled and the related methodology to establish the figures.
- energy efficiency measures based on best available techniques such as a stable shredder feed, energy efficiency plans, and energy balance records.
- pollution and emissions control based on best available techniques: air emissions reduction requirements covering dust, metals, toxic and persistent pollutants (e.g. PCDD/F, PCBs); detailed wastewater treatment requirements; measures addressing diffuse dust emissions from storage, handling, transport, and slag processing; specific provisions on the safe storage, dismantling, and separation of waste components; measures ensuring that all key pollutants associated with metal waste management are covered.
- residual waste management: landfill acceptance criteria for metal waste and systematic testing of waste composition and leaching prior to disposal.

3.9 Indonesia

Indonesia submitted its application on 10 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Indonesia to provide additional information. Indonesia provided such information on 15 September 2025. Following a second request for additional information from the Commission, Indonesia shared additional information on 9 January 2026.

Indonesia submitted an application to import ferrous and non-ferrous metal waste as well as paper waste.

Indonesia presents data on waste generation, treatment capacities, types of domestic waste, and existing objectives and measures. The legal framework supporting environmental inspections, enforcement, and key operational requirements for waste management is generally well described, and the country identifies the authorised recovery facilities for the waste streams concerned.

However, the application presents several important shortcomings that limit the ability to conclude that imported waste will be managed in an environmentally sound manner. For both waste streams, the application does not provide sufficient methodological detail regarding waste quantity calculations, future projections, or the treatment capacity figures submitted. In addition, for both waste streams, the application does not provide sufficient evidence that comprehensive pollution controls are implemented during waste treatment, particularly regarding emission limit values, operational environmental safeguards, and quality assurance measures. These gaps are more pronounced for metal waste, where several key elements of the national waste management strategy are incomplete. The application failed to provide several critical operational and environmental protocols related to metal waste. These include requirements for stable shredder feed, energy efficiency planning, water-saving measures, and comprehensive water management. It also omits procedures relating to waste handling and transfer, scrap quality control, dust emission prevention, landfill acceptance criteria, landfill-specific operations, and the use of independent laboratories for waste testing. The framework lacks robust measures to

optimise energy and water use, ensure strict quality standards for recyclables, and minimise environmental risks.

Civil society organisations approached the European Commission, expressing concerns regarding the impacts of imported waste to the domestic waste management system in Indonesia.

The concerns expressed cover:

- Imported paper waste management in East Java
- Challenges with residual plastic waste management, notably enforcing the contamination threshold laid down in Indonesian law.

The European Commission invited Indonesia to provide further additional information and clarifications on how the above-mentioned challenges are addressed in Indonesia. Indonesia provided a response on 29 January 2026.

In its response, the authorities in Indonesia indicated that companies importing recycled paper are required to ensure the proper management of residual impurities, either in-house, collective mechanisms, or through cooperation with duly licensed third-party waste management service providers.

The authorities indicated that a third-party service provider in East Java did not process the paper waste as envisaged and that now another company has been engaged that has adequate capacity to process the waste. The authorities furthermore provided a schematic overview of the impurity management process flow of the new company.

A more detailed assessment of Indonesia's request can be found in Annex IX.

As a result of this assessment, Indonesia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Indonesia to further elaborate the following elements:

- provide comprehensive future treatment capacity projections and methodologies for both metal and paper/cardboard waste, as well as detailed strategies and measures to increase recycling rates and reduce landfilling.
- provide clear methodologies for calculating waste generation, recycling and landfilling rates, treatment capacity projections, and estimates of imported waste, along with supporting evidence validating these calculations.
- demonstrate how imported waste is treated without negatively affecting domestic waste management and provide clear procedures ensuring that imported waste meets environmental protection requirements equivalent to EU standards.

- submit detailed information on operational environmental controls in waste treatment facilities, including emission limit values, monitoring requirements, energy and water efficiency measures, and quality assurance standards needed to demonstrate effective pollution prevention.
- provide concrete examples, data, or statistics showing how inspections, enforcement actions, and pollution control obligations are applied in practice, particularly for facilities authorised to treat the waste types concerned.

The information on metal waste streams should also address the following:

- provide a robust strategy for the treatment of residual waste from metal scrap processing via shredding and hydrometallurgical treatment.
- provide landfill waste acceptance criteria, landfill-specific operational procedures and monitoring requirements, including explicit rules for acceptance, and documentation protocols tailored to metal waste.
- provide strong emissions control and monitoring of key pollutants during metal shredding or hydrometallurgical treatment, such as heavy metals, PCBs, dioxins, sulphur dioxide, HCl, Cl₂ and HF.
- address other key requirements such as a stable shredded feed, energy efficiency plans and quality control of metal scrap.

The Commission intends to reevaluate the inclusion of Indonesia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.10 Kazakhstan

Kazakhstan submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Kazakhstan to provide additional information. Kazakhstan provided more information on 16 September 2025 and 11 January 2026.

The application of Kazakhstan referred to waste batteries under Basel entry B1090. Whereas this entry in principle covers non-hazardous waste batteries, the application explicitly refers to “lithium-ion batteries”. Such waste is classified under the European List of Waste with specific hazardous codes, notably *16 06 07** (waste lithium-based batteries) and *20 01 43** (separately collected municipal waste lithium-based batteries) due to fire and explosion risks.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes above are therefore not eligible for the inclusion in the list of countries which could be authorised to export waste to the EU (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes will therefore not be considered in the assessment of the application of Kazakhstan.

The application by Kazakhstan also covers ferrous and non-ferrous metal waste.

The application of Kazakhstan provided estimates of the available waste treatment capacity for the wastes concerned by the request and also provided information on the legal framework in the country that requires waste transporters to be registered, further mentioned pieces of legislation for environmental protection, waste management and on the import and export of waste and indicated that inspections regarding environmental protection are carried out.

However, the application did not provide sufficient information regarding its national waste management strategy and plan. In addition, the information that Kazakhstan provided does not demonstrate that residual waste generated by treating the waste concerned by the request is managed in an environmentally sound manner.

Furthermore, the information provided did not demonstrate that pollution controls for waste treatment are implemented at an equivalent level compared to the EU or that sufficiently robust legislation exists and is implemented for environmental risk reduction during waste storage, handling, and transfer, as well as measures to prevent diffuse emissions and control hazardous substances during various waste management operations.

The names of two facilities are given in the country's application along with their address, the type of waste that they are planning to import. Their permit number is not provided but Kazakhstan's application stated that they are operating under a waste management and an environmental permit license. Their authorised treatment capacity was not mentioned.

Kazakhstan has ratified the Basel Convention and complies with its reporting obligations. The country has not ratified the Minamata Convention and did not explain the reason for not ratifying. Kazakhstan ratified all other relevant international agreements but did not provide evidence on whether and how it complies with its reporting and other obligations for these other multilateral agreements.

A more detailed assessment of Kazakhstan's request can be found in Annex X.

As a result of this assessment, Kazakhstan could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.11 Lao PDR

Lao PDR submitted its application on 22 June 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Lao PDR to provide additional information on 11 July 2025, with a reminder sent on 5 December 2025. Lao PDR provided more information on 18 December 2025.

The application by Lao PDR covers paper waste.

Lao PDR's application contains general information regarding its legal framework for waste management and environmental protection. Also, the application presented the country's waste management strategy focussing on landfilling as the main option to

address waste management. Based on the information contained in the application, Lao PDR's capacity to recycle any waste, and notably paper waste as the waste concerned by its request, is very limited. This element, combined with the fact that the reported volume of the paper waste imported into the country in previous years is very high, casts serious doubts on the sustainability of future import of paper waste and its impact on the domestic waste management system in Lao PDR.

One facility is named in the application along with its address. Neither the permit number nor the authorised treatment capacity is mentioned, but the application claims the facility is duly permitted.

Finally, Lao PDR also did not provide sufficient information on its compliance with the relevant international agreements referred to in Annex VIII of the WSR.

A more detailed assessment of Lao PDR's request can be found in Annex XI.

As a result of this assessment, Lao PDR could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.12 Malaysia

Malaysia submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Malaysia to provide additional information. Malaysia provided such information on 31 October 2025. Following a second request for additional information from the Commission, Malaysia responded on 9 January 2026 that there will be no further response to the additional request for information, as the official information and data are not available.

The application of Malaysia covers non-hazardous plastic waste classified under code B3010. This entry was effective only until 31 December 2020, and from 1 January 2021, non-hazardous plastic waste could be classified under the Basel code B3011. The European Commission assumed that the request of Malaysia may be interpreted as covering non-hazardous plastic waste classified under code B3011. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste is prohibited to be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Malaysia.

The application by Malaysia also covers ferrous metal waste, non-ferrous metal waste, paper waste, wood waste, rubber waste, textile waste and glass waste.

The application contains comprehensive information on Malaysia's national waste management framework at an aggregate level. Sanitary landfills remain the main disposal method. It outlines objectives and measures to reduce landfilling and increase waste-to-energy technologies and recycling. It provides also comprehensive information on waste imports through a permit-based system linked to domestic treatment capacity.

Malaysia ratified the Basel Convention and complies with its reporting obligations, but the country has not ratified all other relevant international agreements.

The application identified authorised treatment facilities by name, address, permit number, and waste type.

Malaysia's application contained general information on its legislative framework on residual waste treatment (indicating that landfilling remains the primary method for disposing of municipal residual waste) and on general pollution controls for waste treatment.

However, the application lacked critical information required for a complete waste-stream-specific assessment.

Treatment capacity data and projections are missing across all waste streams, as are landfill rates and related calculation methodologies. For wood, rubber, textile, and partly glass waste, basic data on quantities generated and recycled are missing, and no treatment facilities are identified. The legal framework does not provide sufficient information waste-specific requirements on the management of residual waste, landfill acceptance criteria and operational pollution control measures, including systematic control of key pollutants. Across most waste streams, pollution control information remains generic, with gaps concerning specific requirements regarding diffuse emissions, secondary material recovery, energy use, and several key pollutants relevant to the specific treatment processes concerned are not addressed.

The application provided insufficient information on general pollution controls for ferrous metal and non-ferrous waste. The application of Malaysia failed to include crucial requirements for the environmentally sound treatment of metal waste, namely: maintaining a stable shredder feed, preparing energy efficiency plans or energy balance records, recovering secondary materials, controlling energy use in secondary copper production, preventing diffuse emissions during scrap pretreatment, or reducing HCl, Cl₂, and HF emissions. Furthermore, the application failed to demonstrate that a legislative framework sets acceptable emission limits and control of key pollutants such as heavy metals, dust, dioxins, sulphur dioxide and NO_x.

Civil society organisations provided information to the European Commission, expressing concerns regarding the impacts of imported waste to the domestic waste management system in Malaysia.

The concerns expressed relate to:

- local recyclers' inability to manage paper waste, metal waste, residual plastic waste, textile waste and waste tyres in an environmentally sound manner;
- challenges with the enforcement capacity of Malaysian government agencies to monitor and stop illicit waste trafficking and dumping; and
- the risks of criminality and corruption involved in waste trafficking.

The Commission provided this information to the Malaysian authorities for comments but did not receive a reply.

A more detailed assessment of Malaysia's request can be found in Annex XII.

As a result of this assessment, Malaysia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste and glass waste;

- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Malaysia to provide additional information on the following elements:

- Comprehensive information on residual waste management: provide detailed information on the legislative framework and regulatory requirements governing residual waste management. This should include provisions on bans on waste dilution or mixing, requirements for detailed waste characterisation and testing, annual compliance testing, and limits for co-disposal of waste.
- Detailed pollution control and emission management measures: describe in detail the emission limits, monitoring requirements, and best available techniques applied for each waste treatment, incineration, and co-incineration facilities, with waste-stream specific information and references to their legal basis.
- Treatment capacities for all waste streams and landfill rates: provide information on quantities of waste generated and recycled, including the identification of treatment facilities, notably for metal, wood, rubber, textile and glass waste.

The information on metal waste streams should also address the following:

- measures to develop energy efficiency plans and energy balance records, maintain a stable shredder feed, recover secondary materials, and prevent diffuse emissions during metal scrap pretreatment.
- legislative framework and enforcement measures for the control of pollutants such as heavy metals, dust, dioxins, sulphur dioxide and NO_x, and for curbing toxic emissions (e.g. HCl, Cl₂, HF).
- estimate of the country's treatment capacity and a 10-year projection of the country's treatment capacity for metal waste, and the related methodology.
- proportion of domestic metal waste that is recycled and the related methodology.

The Commission intends to reevaluate the inclusion of Malaysia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.13 Mauritius

Mauritius submitted its application on 18 April 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Mauritius to provide additional information. Mauritius provided such information on 19 September 2025. Following a second request for additional information from the Commission, Mauritius shared additional information on 9 January.

The application of Mauritius referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such

waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Mauritius.

Mauritius' application further covers 1 eligible waste type: paper waste.

Mauritius' application provided an overview of its waste management framework, referencing the Waste Management & Resource Recovery Act 2023, which establishes provisions for hazardous waste management, including collection, storage, transportation, pre-treatment, recovery, and disposal.

However, the information provided on the management of imported waste, as well as on how data were collected or calculated, is limited. Mauritius' application stated that the only recycling plant in the country will import 3,500 tonnes of waste to recycle it. No further insight was provided however in the broader strategy to ensure the environmentally sound management of waste imported into its territory.

In addition, more information should be gathered to fully demonstrate that residual waste generated by treating the imported waste will be managed in an environmentally sound manner, and that comprehensive pollution controls for waste treatment are implemented. The application stated that no waste incineration facilities exist in the country, and that the non-recycled paper and residual waste are landfilled. The application did not provide details on environmental risk reduction in waste storage, handling, and transfer, nor on control measures for soil, groundwater, dust, and wind drift. While the existence of permitting and authorisation systems is mentioned, the application did not provide sufficient data or documentation on the implementation and enforcement of procedures and measures. There is neither quantitative data on the number or nature of inspections, nor detailed evidence of systematic spot checks or physical checks.

The information submitted also shows that Mauritius fulfils its relevant international commitments.

A more detailed assessment of Mauritius' request can be found in Annex XIII.

As a result of this assessment, Mauritius could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for paper waste.

In addition, the Commission services emphasise the need for the authorities from Mauritius to further elaborate the following elements:

- methodologies for waste quantity calculations, future projections and estimation of the treatment capacity for imported waste.
- legal framework for landfill management, including detailed landfill acceptance criteria, operator competence, financial security requirements, and comprehensive emission limits for all relevant pollutants.
- implementation of best available techniques (BATs) for pollution control, especially for hazardous and residual waste treatment.
- incorporate detailed occupational health and safety measures for waste management operations.
- data on the implementation and enforcement of the permitting measures, inspections and penalties.

The Commission intends to reevaluate the inclusion of Mauritius into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.14 Moldova

Moldova submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Moldova to provide additional information. Moldova provided more information on 29 October 2025 and 6 January 2026.

The application of Moldova referred to electrical and electronic waste that could be classified under the codes GC010 and GC020. These codes are no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Moldova.

The application by Moldova covers ferrous metal waste, non-ferrous metal waste, glass waste, paper waste, mineral waste and textile waste (cotton waste).

Moldova's application contains detailed information on the overall waste management situation, including overall figures on waste generation, collection and treatment, showing notably that 90% of municipal waste is currently landfilled. The application also shows that Moldova is committed to improve its waste management system, notably through its 2023-2027 National Waste Management Programme. There is also a detailed legal framework in place for waste management, including provisions on import and export of waste, enforcement and inspections.

The application contains data on the facilities which would receive waste exported from the EU and information showing compliance with Moldova's relevant international commitments.

There is however a lack of information on the amount of residual waste stemming from recovery facilities, which is particularly challenging to manage sustainably. In addition, landfilling for separately collected waste is still allowed until 2030.

There is also a lack of information when it comes to the treatment capacity for paper, textile and glass waste, so that the impact of the import of such waste from the EU cannot be properly assessed. In addition, the measures to address pollution from waste management facilities for these waste streams should be further aligned with the EU legislation (especially for wastewater treatment and for addressing specific pollutants).

The application contains data on the number of controls carried out by the waste and chemicals department of the Environmental Protection Inspectorate. It is not clear if these controls are proportionate to the environmental and public health posed by improper waste management practices and if they also include controls on shipments of waste. Data on the imposition of sanctions for breaches of the relevant environmental legislation is also missing.

A more detailed assessment of Moldova's request can be found in Annex XIV.

As a result of this assessment, Moldova

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste, paper waste, textile waste, glass waste and mineral waste.

In addition, the Commission services emphasise the need for the authorities from Moldova to demonstrate how the implementation of the 2023-2027 National Waste Management Programme is progressing and delivering results, as well as which measures are being taken to ensure that all pollution linked to waste management facilities for all waste requested (paper, textile, glass, metal) is being properly monitored and mitigated. Additional information on the number of inspections and penalties linked to breaches of environmental legislation in the waste sector is also essential.

The Commission intends to reevaluate the inclusion of Moldova into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.15 Monaco

Monaco submitted its application on 17 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Monaco to provide additional information. Monaco provided such information on 18 September 2025, 10 January and 13 March 2026.

The application of Monaco referred to waste code 20 03 99 that concerns municipal waste and corresponds to Basel code Y46. According to Article 39(1) point (c) of the Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such of waste was not considered when assessing the application of Monaco.

Monaco submitted a request to import wood waste, organic waste and textile waste.

Monaco's application provides an excellent overview of its waste management strategy and legal framework, as well as a satisfactory insight in how it implements and enforces that. Monaco can be assessed as sufficiently committing to the relevant international agreements.

For all the eligible waste types concerned by the request, Monaco has sufficiently informed about measures for ensuring that residual waste generated by treating the waste concerned by the request is managed in an environmentally sound manner. Furthermore, whereas the current emission limits applied in Monegasque law are currently significantly higher than the limits applied in EU, the country has demonstrated that it will implement an equivalent level of pollution controls for waste treatment in new legislation that is in the process of adoption at their national level.

Monaco's application provided the information of the single facility that would manage the waste covered by the request. Also, the name and address, permit number, the types of

waste concerned by the request that the facility is authorised to recover, and the authorised treatment capacity was provided.

Monaco has ratified the Basel Convention and 6 multilateral agreements but not the eight ILO conventions. The reason provided for not ratifying these conventions is because of the "administrative burden" of participation as a small country. However, Monaco explained that it complies with these conventions through other international instruments and national law.

A more detailed assessment of Monaco's request can be found in Annex XV.

As a result of this assessment, Monaco could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for wood waste, organic waste and textile waste as covered under the request by Monaco.

3.16 Montenegro

Montenegro submitted its application on 26 March 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Montenegro to provide additional information. Montenegro provided such information on 28 October 2025. Following a second request for additional information from the Commission, Montenegro shared additional information on 19 January 2026.

The application covers aluminium waste and waste pneumatic tyres.

Montenegro's application contains comprehensive information on the country's waste management system, a complete overview of the legislative measures in place for inspections and penalties, and evidence of their practical implementation. The information provided by Montenegro also properly covers recycling strategies, legislative frameworks, enforcement.

Montenegro's application provided the details on the only facility that is authorised for final recovery operations for aluminium waste, together with its authorised treatment capacities. It also provided the details on the only facility that is authorised for final recovery operations of waste tyres, together with its authorised treatment capacities. Serious concerns remain however regarding the limited formal treatment capacity in Montenegro as well as regarding reported illegal disposal and burning with significant negative environmental and health impacts.

Montenegro has ratified the Basel Convention, and all the other relevant international agreements. Montenegro complies with the reporting obligations of the Basel Convention and most other agreements, but not or only partially complies with the reporting obligations of the Stockholm Convention.

A more detailed assessment of Montenegro's request can be found in Annex XVI.

As a result of this assessment, Montenegro

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, for aluminium waste and waste pneumatic tyres;

In addition, the Commission services emphasise the need for the authorities from Montenegro to provide additional information to confirm that the environmental sound management of waste tyres imported from the Union is ensured in the country. The Commission intends to reevaluate the inclusion of Montenegro into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.17 Morocco

Morocco submitted its application on 21 March 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Morocco to provide additional information. Morocco provided more information on 29 November 2025 and 19 January 2026.

The application of Morocco referred to several waste codes that concern hazardous waste:

- A1100: Dusts and residues from gas cleaning systems of copper smelters.
- A1110: Spent electrolytic solutions from copper electrorefining and electrowinning operations.
- A1120: Waste sludges, excluding anode slimes, from electrolyte purification systems in copper electrorefining and electrowinning operations.
- A1130: Spent etching solutions containing dissolved copper.
- A1140: Waste cupric chloride and copper cyanide catalysts.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Morocco.

The application of Morocco also referred to plastic waste under Basel entry B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Morocco.

The application also covers ferrous metal waste, non-ferrous metal waste, textile waste, mineral waste and waste pneumatic tyres.

The application of Morocco regarding its waste management and environmental legal framework can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

In its application, Morocco provided comprehensive information on its enforcement and inspection framework. Moroccan law empowers competent authorities and the Environmental Police to carry out periodic and unannounced inspections of waste management activities. The Moroccan policy framework sets out detailed inspection planning procedures for waste management facilities. The application contains data on inspections carried out but not on follow-up actions (including possible penalties for breaches of the legal framework on waste management).

Morocco has provided sufficient information on its waste management strategy, policy and measures taken to specifically manage the following wastes covered by its request in an environmentally sound manner: textile waste and mineral waste.

Regarding waste tyres, more information is needed on whether capacity is needed to rule out that imported tyres are diverted to landfills or dumping sites, as well as whether sufficient measures are taken to control pollution related to treatment of such waste.

Regarding ferrous and non-ferrous metal waste, the request does not describe requirements to ensure a stable shredder feed for optimised energy use, nor does it set out specific rules to reduce environmental risks linked to waste storage, handling, and transfer, such as segregation, spill prevention, or capacity and safety conditions. The request does not provide all the quantitative limits for the key pollutants related to the treatment of ferrous metal waste.

Finally, Morocco largely fulfils its relevant international commitments, but the non-ratification of two ILO conventions remains a point of attention.

A more detailed assessment of Morocco's request can be found in Annex XVII.

As a result of this assessment, Morocco

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for the following types of waste as specified in Annex XVIII: textile waste, mineral waste and waste pneumatic tyres;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Morocco to further elaborate on the following elements:

- implementation of measures to improve separate waste collection, reduce landfilling and increase recycling capacity,
- permit or registration obligations for the collection, transport, or treatment of non-hazardous waste,
- enforcement of the rules
- ratification of international Conventions mentioned in the WSR. information to confirm that the environmental sound management of waste tyres imported from the Union is ensured in the country.

- Regarding the permitting, licensing or registration system for waste treatment facilities, Morocco should provide information on explicit requirement for the periodic reconsideration or systematic updating of permits once they have been issued.

The information on metal waste streams should also address the following:

- Morocco should provide information on how the quantities of metal waste generated in the country will develop in the next 10 years, as well as information on how the treatment capacity of ferrous waste will develop in the next 10 years.
- Regarding the provisions designed to ensure that the residual waste generated through the recovery operation for the metal waste is managed in an environmentally sound manner, Morocco should provide information on specifically defined limit values for granular non-hazardous waste co-disposed with hazardous waste
- Regarding pollution controls applying to waste treatment operations, Morocco should provide information on requirements to ensure a stable shredder feed for optimised energy use, specific rules to reduce environmental risks linked to waste storage, handling, and transfer, such as segregation, spill prevention, as well capacity and safety conditions. Morocco should also provide all the quantitative limits for the key pollutants related to the treatment of metal waste.

The Commission intends to reevaluate the inclusion of Morocco into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.18 Nigeria

Nigeria submitted its application on 27 January 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Nigeria to provide additional information. Nigeria provided such information on 28 November 2025. Following a second request for additional information from the Commission, Nigeria shared additional information on 12 January 2026.

Nigeria submitted an application to import textile waste, paper waste, non-hazardous fly ash and refuse-derived fuel (RDF).

The application included general information on Nigeria's national waste management strategy, including estimates of total waste generation, ten-year projections, and concise data on recycling, landfilling, and treatment capacities for the waste streams concerned. For specific waste streams, the application of Nigeria provided estimates of quantities generated, recycling rates, and identifies two treatment facilities for textile waste and RDF.

However, the application lacked critical information on a number of elements: treatment capacities are generally lower than domestic waste generation, future projections are incomplete, and there are no explanations on the methodologies on how reported figures are collected and validated. Information on separate collection, landfill reduction measures, and the environmental impact of imported waste is insufficient. The legal

framework is presented largely by reference to legislation titles, without description of the content of the legislation, particularly regarding inspections, penalties, emission controls, and environmentally sound management practices. It does not provide for periodic or non-routine inspections of facilities and transport operators, nor does it establish requirements for monitoring emissions or recording data for compliance verification. Enforcement strategies are insufficiently documented, with limited details on inspections and no evidence of penalty implementation. For waste-stream specific assessments, the application of Nigeria did not provide comprehensive information on authorised treatment facilities, permits, technical processes, or emission standards, and inconsistencies remain regarding RDF treatment capacity.

It is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

A more detailed assessment of Nigeria's request can be found in Annex XVIII.

As a result of this assessment, Nigeria could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.19 North-Macedonia

North Macedonia submitted its application on 19 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited North Macedonia to provide additional information. North Macedonia provided more information on 16 October 2025 and 13 February 2026.

North Macedonia submitted an application to import ferrous metal waste, non-ferrous waste, paper waste, organic and agro-food waste, and glass waste.

Overall, the application of North Macedonia provided an acceptable description of the state of play regarding its waste generation and management, as well as its waste policy strategy, but details on treatment capacities were lacking.

The application demonstrated that a comprehensive legal framework is in place and is implemented and enforced. Specific points of attention regarding the controls to contain pollution from the management of the requested wastes, as well as with treating residual waste from such operations.

The application of North Macedonia provided a list of permitted treatment facilities, including their names and addresses, permit numbers, and types of waste treated, covering all the waste concerned by the request.

North Macedonia generally fulfils its relevant international commitments.

A more detailed assessment of North-Macedonia's request can be found in Annex XIX.

As a result of this assessment, North Macedonia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, for ferrous and non-ferrous metal waste, paper waste, organic and agro-food waste, and glass waste.

In addition, the Commission services emphasise the need for the authorities from North Macedonia to further elaborate the following elements:

- Regulatory requirements governing residual waste management: provisions on the bans on waste dilution or mixing, requirements for detailed waste characterisation and testing, annual compliance testing, and limits for co-disposal of waste.
- Detailed pollution control and emission management measures: detailed emission limits, monitoring requirements, and best available techniques applied for each waste treatment (including incineration and co-incineration facilities) with information specific to each requested waste stream.

The Commission intends to reevaluate the inclusion of North Macedonia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.20 Oman

Oman submitted its application on 25 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Oman to provide additional information. Oman provided more information on 18 September 2025 and 8 January 2026.

The application of Oman referred to electrical and electronic waste that could be classified under the code B1110. This code is no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Oman.

The application of Oman also referred to non-hazardous plastic waste classified under code B3010. This code is no longer applicable since 1 January 2021 and B3011 now applies for such waste. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such plastic waste cannot be exported from the EU to non-OECD countries and was not considered when assessing the application of Oman.

Oman submitted an application to import ferrous metal waste, non-ferrous metal waste, waste batteries, glass waste, paper waste, rubber waste, textile waste, organic and agro-food waste, and mineral waste.

For a number of the wastes concerned by the request, namely glass, paper, organic and agro-food waste and textile waste, the country has established a robust legislative and enforcement framework, overseen by the relevant competent authorities, which mandates detailed permitting, regular monitoring, and stringent operational standards for waste

facilities. Oman has also implemented ambitious national strategies and action plans, such as the Circular Economy Strategy, with clear targets for waste diversion and recycling. There is evidence of advanced infrastructure for waste collection, treatment, and recovery, including engineered landfills and energy recovery projects.

However, for rubber waste and mineral waste, more information is needed to fully demonstrate equivalence regarding the environmentally sound management of those wastes. The application for mineral waste is missing complete information on the facilities authorised to treat this waste. For rubber wastes, no solid explanation is provided to justify the lack of data.

For ferrous and non-ferrous metal waste, key provisions on energy efficiency were not sufficiently demonstrated, namely stable shredder feed conditions, energy efficiency plans, energy balance records, separation techniques to increase recovery of secondary materials, or energy-efficient practices in secondary copper production.

Finally, Oman largely fulfils its relevant international commitments, but the non-ratification of four ILO conventions remains a point of attention.

A more detailed assessment of Oman's request can be found in Annex XX.

As a result of this assessment, Oman

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for glass waste, paper waste, textile waste, rubber waste, mineral waste, organic and agro-food waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for waste batteries, ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Oman to further elaborate the following elements:

- Provide the annual quantity of total waste generated in the country, as well as the annual quantity of rubber and textile waste, and how those quantities are estimated to develop in the next 10 years.
- Submit a detailed list of facilities that are authorised to recover the wastes concerned by the request, including information on the name, address and permit number of the facility, and the types of non-hazardous wastes or mixtures of non-hazardous wastes the facility is permitted to recover. This information should preferably be provided through a link to a website where information on the facilities concerned is publicly available and electronically accessible (e.g., on the website of the relevant national competent authority).
- Demonstrate the measures that are undertaken to ratify international conventions, particularly The Freedom of Association and Protection of the Right to organise Convention 1948 (n. 87), and the Right to Organise and Collective Bargaining Convention 1949 (n. 98).

The information on metal waste streams should also address the following:

- 10-year projection for the waste generation and the treatment capacity.
- Estimate of the total quantities of waste that are landfilled and recycled, and information on the methodology used to calculate the data.
- Evidence of requirements for stable shredder feed to enhance energy efficiency and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of robust process control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Specific emission limits for harmful contaminants such as heavy metals, polychlorinated dibenzodioxins/furans (PCDD/F) and hydrogen fluoride (HF).

The Commission intends to reevaluate the inclusion of Oman into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.21 Pakistan

Pakistan submitted its application on 20 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Pakistan to provide additional information. Pakistan provided such information on 23 September 2025. Following a second request for additional information from the Commission, Pakistan shared additional information on 9 January 2026.

The application of Pakistan referred to various electrical and electronic waste that could be classified under the code GC020. This code is no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Pakistan.

The application also covers ferrous metal waste, non-ferrous metal waste, non-hazardous waste batteries, paper waste, wood waste, rubber waste, textile waste, mineral waste, acidic waste, glass waste and ceramics waste.

The application provided comprehensive information on Pakistan's national waste management framework. It detailed total waste generation, ten-year projections, and explained how data are collected and validated. The application indicated that 60% of municipal solid waste is collected nationally, with the remainder being either open dumped or burnt. Among the collected waste, approximately 80% of recyclables are recovered and processed, mainly through the informal sector. The remaining 20% of recyclables are only partially managed, with around 60% sent to landfills and 40% littered or burnt. The data also shows that the overall volume of domestically generated waste is higher than the overall treatment capacity. The application describes how imported waste are exclusively destined for recycling.

The application indicated that Waste Management Guidelines are established at federal level and then further detailed at provincial level. It is not fully clear what are the main objectives of these guidelines and indicators to track progress for improve waste management.

Pakistan's application also presented in detail the domestic legal framework covering permitting, monitoring, inspections, enforcement, waste transport, and shipment controls, including full implementation of the Basel convention prior informed consent procedure.

The application presented the legislation applying to the control of pollutants into air, water, and soil, under by the Pakistan Environmental Protection Act (PEPA) 1997 and the National Environmental Quality Standards (NEQS). Emission and discharge limits are established for a large number of parameters and pollutants, but the levels of these limits are not indicated.

The application also contained a provisional list of 259 waste management facilities with information on the types of waste that they cover and, in most cases, their authorised capacity.

The application of Pakistan provided comprehensive details on the legal and institutional framework for enforcing domestic legislation on waste management and waste shipments. It also included examples of penalties imposed and described risk-based inspection procedures for waste shipments. However, the application did not provide quantitative data on the number or frequency of inspections conducted at waste management facilities or for waste shipments. Information on penalties applied for breaches of legislation is also missing.

Overall, the information provided can be considered as sufficient for a number of the waste streams covered by the request.

However, for metal waste and (non-hazardous) batteries waste, Pakistan did not provide key requirements essential for their treatment: maintaining a stable shredder feed, increasing recovery of secondary materials, ensuring efficient energy use in secondary copper production, or preventing diffuse emissions during scrap pretreatment. Moreover, it was not demonstrated which limit values are set for pollutants. In any case the export from the EU of batteries waste that is considered hazardous under EU law, is prohibited to non-OECD countries.

While general permitting, residue management, and some pollution control measures are described, Pakistan should provide confirmation of the implementation of a more detailed framework for pollution control specific the treatment of such waste.

A more detailed assessment of Pakistan's request can be found in Annex XXI.

As a result of this assessment, Pakistan

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, textile waste, paper waste, wood waste, rubber waste, mineral waste, acidic waste, glass waste and ceramic waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article

41 of the Waste Shipment Regulation for waste batteries, ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Pakistan to further elaborate the following aspects:

- Provide detailed pollution control and emission management measures: detailed emission limits, monitoring requirements, and best available techniques applied for each waste treatment, incineration, and co-incineration facilities, with waste-stream specific information and references to their legal basis. This information is of particular relevance for paper, wood and rubber waste.
- Report on the progress and results delivered by the implementation of Waste Management Guidelines for improved waste management in the country.
- Provide data on the number of inspections and penalties linked to breaches of environmental legislation in the waste sector.
- Provide information on measures (such as a ban) restricting the landfilling of separately collected waste intended for reuse or recycling.

The information on metal waste streams should also address the following:

- information on the adequation between the amount of domestically generated waste and imported waste and the treatment capacity for such waste.
- Evidence of requirements for stable shredder feed to enhance energy efficiency and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of robust process control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Specific emission limits for harmful contaminants such as heavy metals, polychlorinated dibenzodioxins/furans (PCDD/F) and hydrogen fluoride (HF).

The Commission intends to reevaluate the inclusion of Pakistan into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.22 The Philippines

The Philippines submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited The Philippines to provide additional information. The Philippines provided more information on 19 September 2025 and 30 January 2026.

The Philippines submitted an application to import paper waste from the EU.

The application of The Philippines regarding its waste management and environmental legal framework can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that. The Philippines have provided sufficient information on its policy and measures taken to specifically manage paper wastes as covered by their request in an environmentally sound manner.

The country has established a comprehensive legislative framework mandating the relevant authorities to plan and conduct inspections across various waste management operations

The Philippines' application provided the relevant details for four registered facilities, including their names and addresses, permit numbers, the types of waste the facilities are authorised to recover, and the authorised treatment capacities.

The Philippines fulfils its relevant international commitments.

A more detailed assessment of the Philippines' request can be found in Annex XXII.

As a result of this assessment, The Philippines could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for paper waste as covered by their request.

3.23 Saudi Arabia

Saudi Arabia submitted its application on 19 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Saudi Arabia to provide additional information in June 2025. However, no additional information was received. In reply to another invitation for additional information, Saudi Arabia submitted more information on 12 January 2026.

The application of Saudi Arabia referred to non-hazardous plastic waste classified under code B3010. This code is no longer applicable since 1 January 2021 and B3011 now applies for such waste. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Saudi Arabia.

Saudi Arabia's application also covered ferrous metal waste, non-ferrous metal waste, paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, and glass waste. The application contains limited information on the legislative framework on residual waste treatment and on general pollution controls for waste treatment.

The application provided general information on the country's national waste management strategy, including aggregate estimates of total waste generation, ten-year projections, and data on recycling, landfilling, and treatment capacities for total waste. It confirms ratification of the Basel Convention, several other multilateral environmental agreements, and compliance with their core obligations. For specific waste streams, the application

provided limited estimates of recycling and landfilling rates and identifies treatment facilities through a publicly accessible online directory.

However, the application lacked critical information for a full assessment. Waste generation and treatment capacity figures are generally presented only in aggregate, with insufficient detail for each waste stream. The legal framework was presented without detailed content on permit conditions, residual waste management, emission controls, or BAT application. Finally, most key pollutants relevant to the wastes concerned by the request were not mentioned.

Regarding pollution controls for paper waste, the framework explained in the application outlines general measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission limits, pollution control provisions, and mandatory monitoring, and it addresses the optimisation of water consumption and the prevention of wastewater emissions. The framework also includes requirements to reduce environmental risks related to the storage, handling, and transfer of waste through licensing and compliance mechanisms. It remains a point of attention that many key pollutants relevant to the treatment of paper waste are not mentioned.

For ferrous and non-ferrous metal waste, the application did not demonstrate a ban on waste dilution or mixing for treatment residues and a ban on landfilling separately collected waste intended for reuse or recycling. It also failed to demonstrate the implementation of annual compliance testing, the use of independent laboratories and the application of limit values for co-disposal of waste. Regarding provisions on pollution controls, the application insufficiently demonstrates equivalence with EU standards since it does not provide requirements for maintaining a stable shredder feed, implementing energy efficiency plans or energy balance records, controlling scrap quality to minimise pollutants, or preventing and reducing diffuse dust emissions. Moreover, not all key pollutants relevant to ferrous and non-ferrous metal waste are addressed.

A more detailed assessment of Saudi Arabia's request can be found in Annex XXIII.

As a result of this assessment, Saudi Arabia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, and glass waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for Saudi Arabia to further demonstrate the following aspects:

- Provide comprehensive data on residual waste management: detailed information on the legislative framework and regulatory requirements governing residual waste management, with waste-stream specific information. This should include provisions on bans on waste dilution or mixing, requirements for detailed waste characterisation and testing, annual compliance testing, and limits for co-disposal of waste.

- Describe in detail pollution control and emission management measures: emission limits, monitoring requirements, and best available techniques applied for each waste treatment, incineration, and co-incineration facilities, with waste-stream specific information and references to their legal basis.

The information on metal waste streams should also address the following:

- An estimate of the annual quantity of metal waste generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years.
- An estimate of the country's treatment capacity for metal waste, a 10-year projection of the country's treatment capacity for such waste, and information on the methodology to obtain the data.
- Evidence of requirements for stable shredder feed to enhance energy efficiency and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Implementation of specific emission control measures and of emission limits for harmful contaminants such as heavy metals, polychlorinated dibenzodioxins/furans (PCDD/F), hydrogen fluoride (HF), hydrogen chloride (HCl) and Cl₂.

The Commission intends to reevaluate the inclusion of Saudi Arabia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.24 Serbia

Serbia submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Serbia to provide additional information. Serbia provided more information on 30 October 2025 and 12 January 2026.

The application covers ferrous metal waste, non-ferrous waste, some specific types of mineral waste, waste tyres and paper waste.

Serbia submitted a request to add certain waste streams to their initial request on 1 April 2026. In view of the deadline of 21 February 2025 and the stage of the assessment process at the moment where this additional request was made, it could not be taken into consideration in view of establishing the first list of countries to which the export of certain non-hazardous waste is still allowed after 21 May 2027. The additional request may rather be considered for the next update of that list.

The application contains information on the overall waste generation in the country, as well as estimates on treatment for various wastes streams (indicating notably that 80% of municipal waste was landfilled in 2023, like in previous years) and on separate collection.

The information contained in the application shows that Serbia has an ambitious strategy to improve waste management (enshrined especially in the Waste management programme for 2022-2031) and intends to adopt its first Waste prevention plan. Serbia has a detailed and adequate legal framework, especially for the import and transport of waste and permitting for waste treatment operators.

The legislation prescribes obligations on waste operators to ensure a proper treatment of residual waste, via the inclusion of specific requirements in their permits.

However, more information is needed on the overall management of the mineral waste types covered by the request.

The application contains detailed explanations on pollution control measures applying to various waste management operations, notably regarding ferrous and non-ferrous metal waste and paper waste. However, it is not clear what pollution control measures and associated emission limits are applied for industrial facilities processing waste tyres, especially small and medium facilities.

The application contains data on the annual number of inspections carried out by the environmental protection inspectors to ensure the implementation of the rules on the import and management of waste. These inspections led to a limited number of non-compliance situations and further information should be provided on whether these situations resulted in any penalty for the operators concerned.

The application contains data on the facilities authorised to import waste and information showing compliance with Serbia's relevant international commitments.

A more detailed assessment of Serbia's request can be found in Annex XXIV.

As a result of this assessment, Serbia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste rubber waste and paper waste;

In addition, the Commission services emphasise the need for the authorities from Serbia to further demonstrate, in particular, which measures are being taken to ensure the implementation of their strategy to improve waste management, as well as the application of enforcement measures to ensure that waste shipment and management operations are carried out in compliance with the legislation. Although mineral waste and rubber waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these waste streams imported from the Union is ensured in the country.

The Commission intends to reevaluate the inclusion of Serbia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.25 Singapore

Singapore submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Singapore to provide additional information. Singapore provided such information on 4 December 2025. Following a second request for additional information from the Commission, Singapore shared additional information on 8 January.

The application submitted by Singapore covered one waste code: waste batteries under Basel entry B1090. The application of Singapore clarified that the request specifically concerns Lithium-based waste batteries. Such waste is considered as hazardous under EU law. ⁽⁹⁾

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, thus such waste was not considered for assessment.

As a result, Singapore cannot be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.26 Sri Lanka

Sri Lanka submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Sri Lanka to provide additional information. Sri Lanka provided more information on 29 November 2025 and 19 January 2026.

The application of Sri Lanka referred to plastic waste under Basel codes B3010 and B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Sri Lanka.

Sri Lanka submitted an application to import ferrous metal waste, non-ferrous metal waste, waste batteries and catalysts, paper waste, waste from pre-treatment of composite packaging, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, acidic waste, glass waste, ceramics waste and waste paint, dyes and inks.

Overall, Sri Lanka provided comprehensive information on a set of legislative measures demonstrating that air, water, and soil are protected through a structured legal framework. Sri Lanka has provided sufficient information on its policy and measures taken to specifically manage a number of the eligible wastes covered by its request, notably wood

⁽⁹⁾ Li-ion batteries are classified as hazardous waste in the EU List of Waste (The Commission Delegated Decision (EU) 2025/934 of 5 March 2025 amending Decision 2000/532/EC as regards an update of the list of waste in relation to battery-related waste can be found here: [Delegated decision - 2025/934 - EN - EUR-Lex](#)); see code 160607*.

waste, rubber waste, organic and agro-food waste, textile waste, mineral waste, acidic waste, ceramics waste, and waste paint, dyes and inks in an environmentally sound manner.

The application of Sri Lanka provided information on the regulation of pollution control in the context of the treatment of glass waste, demonstrating coverage of air emission control, including dust, metals, dioxins and furans and PCBs, with the use of scrubbers and filters. However, the assessment shows that further information is needed regarding specific provisions for controlling input materials, reducing metal emissions, and applying filtration or material control during glass melting processes.

Regarding paper and rubber waste, more information is needed on how Sri Lanka's legal framework address pollution controls and moreover, not all key pollutants related to paper residues' treatment are addressed.

The application of Sri Lanka indicated that it implements a regulatory framework for waste tyre handling and processing, but limited quantitative data is available on actual processing levels. The existence and risks related to open dumpsites remain a significant concern.

Regarding metal waste and batteries waste, the regulatory framework should be reinforced as it did not demonstrate essential energy efficiency requirements for the treatment of such waste: a stable shredder feed, energy efficiency plans, or energy balance records. Also, specific measures are insufficient on scrap quality control or on the safe storage and separation of end-of-life vehicle components. Specifically for batteries and catalyst waste, the application did not demonstrate equivalent standards for the treatment of non-hazardous batteries waste, the removal of batteries from waste appliances, or measures to prevent diffuse emissions during scrap pre-treatment. In any case the export from the EU of batteries waste that is considered hazardous under EU law, is prohibited to non-OECD countries.

The application also included the following non-hazardous waste from the pre-treatment of composite packaging for liquids:

- Non-separable plastic fraction
- Non-separable plastic-aluminium fraction

The management of plastic waste faces serious environmental and human health challenges, notably in countries to which the OECD Decision does not apply, where standards and infrastructure for the management of plastic waste are, in most cases, not as developed as in the EU.

It is important to note that the EU has prohibited the export of plastic waste to non-OECD countries, whereas waste covered by entry B3026 is in fact plastic waste.

The information provided by Sri Lanka indicated that measures have been taken to progressively reduce imports of plastic waste. At the same Sri Lanka took measures to prevent and clean up litter, including through national policy objectives under the National Action Plan on Plastic Waste Management to significantly reduce land-based plastic leakage, but challenges remain.

In light of the above, the export of the waste covered by entry B3026 is not considered appropriate in respect of the EU's policy to not export is waste challenges, notably related to plastic waste.

Sri Lanka fulfils its relevant international commitments.

A more detailed assessment of Sri Lanka's request can be found in Annex XXV.

As a result of this assessment, Sri Lanka

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for wood waste, textile waste, organic and agro-food waste, mineral waste, acidic waste, ceramics waste and waste paint, dyes and inks, glass waste, paper waste and rubber waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for waste batteries, catalysts, ferrous and non-ferrous metal waste and composite packaging waste.

In addition, the Commission services emphasise the need for the authorities from Sri Lanka to further elaborate on the following elements:

- For all requested waste streams, provide an estimate of the annual quantity of waste generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, and provide the methodology to obtain the data.
- For all requested waste streams, provide an estimate of the country's treatment capacity, demonstrate that the treatment capacity is higher than the amount of waste generated, provide a 10-year projection of the country's treatment capacity for such waste, and the methodology to obtain the data.
- The proportion of domestic waste concerned by the request that is landfilled, separately collected and recycled, and the related methodology to obtain the data.
- Demonstrate the implementation of pollution control and emission management measures: describe the best available techniques applied for each waste treatment, incineration, and co-incineration facilities, with waste-stream specific information and references to their legal basis.
- Landfill waste acceptance criteria supported by a structured characterisation and testing hierarchy.
- A legal framework prohibiting the landfilling of separately collected waste intended for reuse or recycling, banning dilution or mixing of waste to meet admissibility requirements, and setting limit values for the co-disposal of granular non-hazardous waste with hazardous waste.

The information on metal waste and battery waste streams should also address the following:

- Evidence of energy efficiency requirements such as stable shredder feed, energy balance records and energy efficiency plans, and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of robust process control procedures (e.g. enclosures or air extraction systems) to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Specific rules on the safe storage and separation of waste fractions, including end-of-life vehicle components.

3.27 Taiwan

Taiwan submitted its application on 11 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Taiwan to provide additional information. Taiwan provided such information on 5 August 2025.

The application of Taiwan refers to plastic waste under Basel codes B3011, as well as to e-waste (GC010) that may fall under Basel codes A1181 or Y49.

According to Article 39(1) points (a) and (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries, thus such waste were not considered when assessing the application of Taiwan.

The application submitted by Taiwan covers six specific types of waste, eligible under Title IV of the WSR: ferrous metal waste under Basel entries B1010 and B1200, non-ferrous metal waste under Basel entries B1010, B1030, B1031, B1080, B1100 and B1150, waste cables (B1115), waste catalyst (B1120, B1130 and GC050), paper waste (B3020) and textile waste (B3030).

Taiwan's application provides a satisfactory overview of its waste management strategy and legal framework, as well as a satisfactory insight in how it implements and enforces that.

Taiwan provided publicly accessible lists of authorised waste management facilities and organisations, including details of their names, permits, the types of waste they are authorised to receive or transport, and, for reuse organizations, maximum monthly recycling capacities, waste sources, purposes, and equipment.

Regarding ferrous and non-ferrous waste, the application of Taiwan failed to provide essential information on the requirements related to the treatment of such waste. These include:

- conditions for maintaining a stable shredder feed,
- implementation of energy efficiency plans considering that metallurgical treatment is highly energy-intensive,
- robust measures to control scrap quality,
- strong measures to minimise the contamination and release of toxic pollutants (heavy metals, PCBs, HF, Cl₂, etc.) in air, soil and wastewater,
- reduction of dust emissions from slag and electric arc furnaces processes.

Taiwan sufficiently fulfils its relevant international commitments.

A more detailed assessment of Taiwan's request can be found in Annex XXVI.

As a result of this assessment, Taiwan

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, for paper waste and textile waste, as specified in the request;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to

Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Taiwan to further elaborate on the following elements regarding the management of metal waste:

- conditions for maintaining a stable shredder feed,
- implementation of energy efficiency plans considering that metallurgical treatment is highly energy-intensive,
- robust measures to control scrap quality,
- strong measures to minimise the contamination and release of toxic pollutants (heavy metals, PCBs, HF, Cl₂, etc.) in air, soil and wastewater,
- reduction of dust emissions from slag and electric arc furnaces processes.

3.28 Thailand

Thailand submitted its application on 14 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Thailand to provide additional information. Thailand provided more information on 16 December 2025 and 15 January 2026.

Thailand submitted an application for 4 types of waste, namely ferrous and non-ferrous metal, paper waste and rubber waste.

The application demonstrated that a legal framework for managing waste in an environmentally sound manner is in place, that a clear strategy is followed for enforcing domestic waste management and shipment legislation, and that measures relevant to the protection of the environment and human health in the context of waste management operations, particularly for the protection of air, water and soil, are laid down to a certain extent.

The country's application provided comprehensive information on the waste management system in view of waste generated, (separately) collected, recycled and landfilled. It also provided a good insight in treatment capacities. The legal framework is outlined in general, but the application does not fully demonstrate the measures to control and limit pollution during the treatment of waste subject to the request.

However, the application did not provide sufficiently detailed information describing the available waste treatment capacity. Regarding the domestic legal framework, the application falls short of presenting a comprehensive overview of the rules on permitting for waste treatment facilities. Moreover, the application lacked detail to assess equivalence with EU benchmarks, particularly regarding the management and treatment of all wastes concerned by the request, and their residual wastes, as well as the related pollution controls and emission limits applied.

Also, the permitting system in Thailand should provide more detailed requirements compared to the EU benchmark and the application did not present a comprehensive legal framework for the management of residual waste resulting from the treatment of the waste concerned by the request.

In addition, for ferrous and non-ferrous metal waste, the application is insufficient as it does not demonstrate what are the measures to control and limit pollution. Legal requirements for comprehensive energy efficiency planning, and specific water-saving or recirculation practices are absent. The regulation of wastewater treatment does not reference best available techniques (BAT), nor are there detailed procedures for scrap quality management to minimise pollution and enhance recovery. Additionally, there are no targeted measures to prevent diffuse dust emissions. Despite the broad monitoring of pollutants, Thailand does not mention monitoring of total volatile organic compounds (TVOC), leaving a gap in its coverage of important substances.

The legislation on inspections and penalties described in the application is comprehensive, but further information should be provided on the number of inspections carried out and penalties imposed for breaches of legal requirements on the environmentally sound management of waste.

A more detailed assessment of Thailand's request can be found in Annex XXVII.

As a result of this assessment, Thailand

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste and rubber waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Thailand to further demonstrate the following aspects:

- Provide more detailed and specific data on waste generation and waste treatment capacity, including total annual quantities and ten-year projections for each waste stream concerned by the request.
- Present more comprehensively the national legal framework for the permitting of waste treatment facilities, including details on periodic renewal, closure, and post-closure obligations, and demonstrate the practical enforcement of rules via penalties.
- Demonstrate a robust legal framework and operational procedures for the management and disposal of residual wastes resulting from recovery processes by elaborating on landfill permitting, operational standards, waste acceptance criteria, ban on waste dilution or mixing, compliance monitoring, systematic waste characterisation and testing with independent laboratory testing, and limit values for co-disposal of certain wastes.
- For incineration or co-incineration plants, provide detailed explanation of operational standards, emission limits, minimum operating temperatures, and organic carbon limits.
- Enhance the description of pollution control measures, including emission limits, energy efficiency, water-saving practices, and monitoring of pollutants.

The information on metal waste streams should also address the following:

- Evidence of energy efficiency requirements such as water saving, stable shredder feed, energy balance records and energy efficiency plans, and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of robust process control procedures with reference to Best Available Techniques to minimise diffuse emissions and release of pollutants and improve recovery rates, including during scrap pretreatment.
- Monitoring of total volatile organic compounds (TVOC) emissions.

3.29 Togo

Togo submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Togo to provide additional information. Togo provided more information on 12 January 2026.

The application of Togo refers to plastic waste under Basel codes B3010 and B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Togo.

Togo's application to import ferrous metal waste, non-ferrous metal waste and paper waste was assessed as insufficiently demonstrating equivalence with EU conditions regarding environmentally sound management for all wastes concerned by the request.

In particular, Togo's application does not distinguish waste quantities by type, nor does it provide methodologies on how the data supplied or forecasts for future waste streams specific to the wastes concerned by the request are collected or validated. The application did not provide information on how the treatment capacities for ferrous metal waste, non-ferrous metal waste and paper waste were determined or estimated. There is insufficient information on the permitting, licensing, or registration rules for waste treatment facilities, and no comprehensive or up-to-date list of authorised treatment facilities was submitted. The application does not detail the legal requirements for periodic environmental monitoring, emission limits for key pollutants, or systematic inspection procedures. Additionally, the application fails to provide references for domestic import/export legislation and does not present evidence of structured frameworks for enforcement and penalties.

A more detailed assessment of Togo's request can be found in Annex XXVIII.

As a result of this assessment, Togo could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

3.30 Tunisia

Tunisia submitted its application on 20 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Tunisia to provide

additional information. Tunisia provided more information on 21 November 2025 and 9 January 2026.

The application of Tunisia referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Tunisia.

The application of Tunisia also referred to e-waste classified under codes B1110, GC010 and GC020. This type of waste is since 1 January 2025 classified under codes A1181 and Y49 and is, according to Article 39(1) points (a) and (c) of the EU Waste Shipment Regulation, not allowed to be exported from the EU to non-OECD countries, thus such waste was also not considered when assessing the application of Tunisia.

Tunisia's application covered 8 eligible waste types, namely ferrous and non-ferrous metal waste, mineral waste, paper waste, textile waste, rubber waste, organic and agro-food waste and ceramic waste.

The information provided on Tunisia waste management plan/strategy is rather general. More information is needed to clarify how these plans will be implemented and what are the main indicators for achieving progress towards its objectives. The application contains general information on the overall volume of waste generated, collected and treated, but this information is often missing for specific waste streams. The application indicates that separate waste collection is currently not mandatory in Tunisia, but that initiatives are planned to promote it.

In addition, the described legal framework only contains basic elements on permitting requirements and lacks comprehensive details on technical standards, environmental protections, monitoring, closure procedures, and periodic review of permits. Furthermore, the application does not adequately address the adoption of advanced environmental protection measures, emission controls, or robust procedures for the monitoring and safe operation of waste treatment facilities. Tunisia's application did provide emission limit values which are monitored for important parameters, namely heavy metals, dust, NO_x, SO₂, HCl. These emission limit values are however systematically 10 times higher than the higher limit values applied in the EU.

In addition, regarding ferrous and non-ferrous metal waste, key requirements are missing from the permitting system such as essential elements including soil/groundwater protection, maintenance rules, abnormal-operation procedures, or compliance assessments. The application is also insufficient regarding provisions on the management of residual waste as it lacks crucial information regarding specific permit conditions, including requirements for efficient resource use or emission limits. Additionally, there is insufficient detail on landfill waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations. Also regarding provisions on pollution controls, the application lacks information on stable shredder feed requirements, energy efficiency measures, and comprehensive emission reduction techniques. The application provides only partial details related to water and wastewater management, environmental risk reduction in storage and handling, scrap quality control, and dust emission abatement.

No examples or statistics on penalties imposed in cases of breaches to legal requirements to ensure the environmentally sound management of waste (numbers, amounts, cases) are provided.

Tunisia has ratified the Basel Convention and 12 of the 13 other relevant multilateral agreements. It has not ratified, but it has signed, the Minamata Convention on Mercury. However, the application does not explain the reason(s) why it has not ratified this Convention. Tunisia complies with the Basel Convention's reporting obligations. The country has not reported under the Stockholm Convention.

A more detailed assessment of Tunisia's request can be found in Annex XXIX.

As a result of this assessment, Tunisia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for mineral waste, paper waste, textile waste, rubber waste, organic and agro-food waste and ceramic waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Tunisia to further demonstrate the following aspects:

- Further document technical and environmental standards for permitting waste facilities, including requirements covering soil and groundwater protection, maintenance, compliance assessments, and periodic permit renewal, and the enforcement of penalties in case of non-compliance.
- Supply detailed information on landfill acceptance criteria, operator competence, financial security, emission limits, and closure and aftercare standards
- Demonstrate the implementation of best available techniques (BATs) for pollution control and safe treatment of residual and hazardous waste.
- Establish and evidence robust monitoring, reporting, and compliance-check systems for all waste management operations, including independent testing, emission controls, and traceability of waste flows.
- Include comprehensive lists of authorised facilities, indicating addresses, permit numbers, capacities, and types of waste treated.
- Demonstrate the application of advanced abatement technologies, energy efficiency measures, water use and treatment protocols, and quality assurance for all waste handling and treatment processes.

The information on metal waste streams should also address the following:

- A 10-year projection on the generated metal waste in the country.
- Evidence of energy efficiency requirements such as water saving, stable shredder feed, energy balance records and energy efficiency plans, and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of control procedures with reference to Best Available Techniques for efficient water and wastewater management, environmental risk reduction in storage and handling, scrap quality control, and dust emission abatement.

The Commission intends to reevaluate the inclusion of Tunisia into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.31 Ukraine

Ukraine submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Ukraine to provide additional information. Ukraine provided such information on 19 September 2025. Following a second request for additional information from the Commission, Ukraine shared additional information on 9 January 2026.

The application by Ukraine covers ferrous and non-ferrous metal waste, paper waste, wood, rubber waste and waste tyres, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, and refuse-derived fuel (RDF).

The application provided comprehensive information on Ukraine's national waste-management framework. It details the total annual waste generated and provides multi-year projections for all major waste streams. Ukraine reports the share of waste that is separately collected, landfilled, and recycled, and describes current and projected treatment capacities, including incineration facilities, recycling plants, landfills, and sector-specific operations. The submission also explains how imported waste is managed within these capacities, highlighting facilities authorised to treat the relevant waste types. Ukraine outlines its domestic legal framework, covering permitting, monitoring, inspections, and compliance, as well as transport requirements, enforcement measures, and penalties. The response demonstrates alignment with the Basel Convention and other relevant multilateral agreements, and illustrates safeguards for air, water, and soil through a structured regulatory system. Furthermore, Ukraine's application provided strategies to reduce illegal dumping, improve waste collection and recycling infrastructure, and integrate environmentally sound management principles into national legislation and operational practice. Concerning waste-stream specific questions, Ukraine's application provided key information for almost all types of the waste concerned by the request.

It is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

A more detailed assessment of Ukraine's request can be found in Annex XXX.

As a result of this assessment, Ukraine

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste, paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramic waste and refused derived fuel.

In addition, the Commission services emphasise the need for the authorities from Ukraine to provide additional information on pollution control and emission management

measures, in particular detailed emission limits, monitoring requirements, and best available techniques applied for each waste treatment and each requested waste stream.

The Commission intends to reevaluate the inclusion of Ukraine into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

3.32 Viet Nam

Viet Nam submitted its application on 21 February 2025. All required information under Part 1 of Annex VIII WSR was duly provided. The Commission invited Viet Nam to provide additional information. Viet Nam provided more information on 13 November 2025 and 9 January 2026.

The application by Viet Nam covered ferrous and non-ferrous metal waste, glass waste and paper waste.

Viet Nam's application provided general information regarding its legal framework for waste management and environmental protection. It indicates especially that 63% of municipal solid waste was landfilled in 2024, with an objective to decrease this rate to 30% in 2025 and 10% in 2030. Separate collection only started to be implemented in 2025. The application also provides information on the current capacity for recycling and plans to increase the share of recycled waste in the country. From the data provided, Viet Nam's recycling capacity remains limited, in particular for the waste concerned by its request, compared to the amounts domestically generated. This raises concerns on the sustainability of the waste management and import system in Viet Nam. The application indicated that Viet Nam intends to phase out waste imports in view of improving domestic waste collection, while at the same time foreseeing an increase in future import of waste.

Finally, pollution control measures are established in the domestic legislation but not at an equivalent level compared to the EU. For instance, the application should further elaborate on the legal framework related to landfill waste acceptance and management, including specific criteria, operator obligations, prohibitions on landfilling recyclable waste, and requirements for testing and compliance. The application of Viet Nam provided emission limit values which are monitored for important parameters, namely heavy metals, dust, dioxins, furans, NO_x, and sulphur. These emission limit values are however systematically 5 times higher than the higher limit values applied in the EU.

In addition, for ferrous and non-ferrous metal waste, Viet Nam's application insufficiently demonstrates the existence of requirements for stable shredder feed, legal obligations for energy efficiency planning, and comprehensive measures for reducing specific air and dust emissions. The application does not properly address the optimisation of water and energy use, specific wastewater treatment techniques, and detailed risk reduction practices in waste storage, handling, and transfer. Further, there is insufficient detail on quality control measures for scrap and on abatement techniques for diffuse dust emissions across storage, handling, and transport operations.

The application contains a list of facilities importing waste as well as comprehensive information on the enforcement of the legislation on waste management.

Civil society organisations provided information to the European Commission, expressing concerns regarding the impacts of imported waste from the EU on the domestic waste management system of various countries. Regarding Viet Nam in particular, the concerns expressed covered:

- The insufficient recycling capacity in Vietnam, taking into account the increase in the amount of imported waste over the last few years and the likely increase in domestic waste collected for recycling under the new EPR requirements in Viet Nam.
- Specific challenges for metal recycling, as well as paper recycling.
- Challenges with enforcement, including to address illegal imports of waste, in particular via Free Trade Zones.

The European Commission invited Vietnamese authorities to provide information and clarifications on how the above-mentioned challenges are addressed in Viet Nam. Viet Nam provided a response on 29 January 2026.

In its response, the authorities in Viet Nam indicated that they have been progressively narrowing the scope of permitted imported waste and aim to gradually phase out waste imports and notably of plastic waste, in view of enhancing domestic waste collection and in the future ensure that domestic supply becomes sufficient to meet production demands in Viet Nam.

Vietnamese authorities also provided more information on the measures they are taking to strictly control imported waste, limit imports to only those waste types that are genuinely necessary for production and establish a clear timeline to phase out plastic waste imports.

Finally, the response by Viet Nam acknowledged the concerns regarding the risk of fraud, transshipment or illegal imports through Free Trade Zones but underlined that only qualified facilities are permitted to import waste and that shipments entering Free Trade Zones are subject to the same electronic customs supervision as other imports and must be accompanied by certificates of conformity with Vietnamese technical regulations issued by independent inspection bodies prior to customs clearance.

More details on the response by the Vietnamese authorities as well as a more detailed assessment of Viet Nam's request can be found in Annex XXXI.

As a result of this assessment, Viet Nam

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for glass waste and paper waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Viet Nam to provide additional information on measures taken to ensure sufficient capacity to manage imported waste on top of domestically generated waste, as well as on the following elements:

- Requirements for landfill management and pollution controls, including clear landfill acceptance criteria, landfill classification, operator competence, financial security requirements, prohibitions on landfilling recyclable waste, and requirements for testing and compliance.
- Requirements setting out comprehensive emission limits for all relevant pollutants.
- Implementation of best available techniques (BATs) for pollution control, especially for hazardous and residual waste treatment.
- Methodologies for waste quantity calculations, projections, and management of imported waste with robust monitoring and reporting systems.
- Information on permitted recovery facilities, including facility addresses, permit numbers, treatment capacities, and waste types treated.

The information on metal waste streams should also address the following:

- Treatment capacity for metal waste and information on how the capacity will evolve in the next 10 years.
- Evidence of energy efficiency requirements such as water saving, stable shredder feed, energy balance records and energy efficiency plans, and requirements for separation techniques to increase the recovery of secondary materials.
- Implementation of control procedures with reference to Best Available Techniques for scrap quality control and abatement of diffuse dust emissions across storage, handling, and transport operations.
- Detailed information on the optimisation of water and energy use, specific wastewater treatment techniques, and detailed risk reduction practices in waste storage, handling, and transfer.

The Commission intends to reevaluate the inclusion of Viet Nam into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

4. OPPORTUNITIES FOR PARTNERSHIPS BETWEEN THE EU AND THIRD COUNTRIES TO IMPROVE WASTE MANAGEMENT

The establishment of the EU list of non-OECD countries authorised to export waste from the EU is one tool in the overall EU strategy to support the transition to a circular economy and more sustainable development activities at the global level.

Beyond the waste shipment regulation, the EU pursues an ambitious policy at the bilateral, regional and global levels for partnerships in areas which are of direct relevance for the improvement of waste management practices.

The EU supports better waste management in third countries through a mix of policy instruments, development cooperation, blending and guarantees, climate and environment funds, and technical assistance. Different instruments can be mobilised depending on the needs and situation of the countries concerned.

For a number of the applicant countries, the assessment emphasized the need for the authorities in the respective countries to provide more information and to further

demonstrate which measures are being taken to ensure equivalence of the conditions under which waste is managed, compared to conditions required in the EU.

The Commission services stand ready to explore measures or mechanisms that could support the respective countries in their efforts to gather and validate data, to develop policy measures or prepare investments to develop its waste management system towards stronger equivalence.

5. NEXT EVALUATION OF THE LIST

According to Article 41(4) of Regulation (EU) 2024/1157, the Commission shall regularly, and at least every two years following its establishment, update the list of countries to which exports are authorised, in order to:

- a) add a country that complies with the requirements set out in Article 42;
- b) remove a country which ceases to comply with the requirements set out in Article 42;
- c) update the information based on a request received from the country concerned and, if that request concerns the addition of new wastes or mixtures of wastes, provided that the country concerned has demonstrated compliance with the requirements set out in Article 42 with respect to the new wastes or mixtures of wastes in question;
- d) include or remove any other element relevant to ensure that the list contains accurate and updated information.

Moreover, where information becomes available showing that the requirements set out in Article 42 are no longer fulfilled for a country already included in the list, the Commission shall invite that country to provide its views on that information, within a maximum period of two months from the invitation, together with relevant supporting evidence demonstrating continued compliance with those requirements.

The Commission may at any time contact a country included in the list to obtain information which is relevant to ensure that that country continues to comply with the requirements set out in Article 42.

At the next evaluation of the list, the countries that were already included can be requested to submit updated information in line with the criteria laid down in Articles 42 and 43 and Annex VIII. In particular, the 15 countries which could be included in the first list (Bangladesh, Bosnia and Herzegovina, Egypt, Georgia, India, Indonesia, Malaysia, Mauritius, Morocco, Oman, Pakistan, Saudi Arabia, Thailand, Tunisia, Viet Nam) would need to provide updated information in the next two years in order to further demonstrate the environmentally sound management of their waste. Some indications on the specific information which should be provided is indicated in Section 3 for every concerned country.

Annex I: Andorra

Andorra submitted its application on 2 July 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Andorra to provide additional information. Andorra provided such information on 9 October 2025.

The application submitted by Andorra covers one specific type of waste, eligible under Title IV of the WSR. This waste is not covered by a particular Basel waste entry, but is covered by a code under the EU List of Waste, namely 19 12 12: Waste (including mixtures of materials) from mechanical processing of waste other than specified in code 19 12 11. It concerns the residual fraction (non-recyclable materials) resulting from the pre-treatment of non-hazardous municipal waste. The waste is intended to be imported into Andorra for energy recovery at one specific energy recovery plant.

I.1 Generic assessment – waste type specific assessment

As Andorra's request concerns only one specific type of waste to be imported to one specific facility, the assessment of the criteria related to the overall situation of waste management in the country and of the criteria that are specific to the type of waste that the country wishes to import from the EU, are assessed together below.

a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU

The application of Andorra provided in its request the total annual quantity of waste generated in the country, the annual quantity of waste generated for each type of waste concerned by the application, as well as how these figures are estimated to develop in the following 10 years.

The application of Andorra also provided data concerning the treatment capacity of the facility designated to manage the waste covered by the application in the country and estimates of how this capacity is expected to develop in the next ten years. These figures show that sufficient capacity is available and that such capacity is ensured for the next decade.

The application of Andorra further provided extensive and clear information regarding the objectives and measures it takes to increase the proportion of separately collected waste and also provided data on the overall proportion of domestic waste, as well as specifically the proportion the most important types of domestic waste that are separately collected.

The application of Andorra explained that no landfilling takes place in the country, but waste is exported for landfilling. In this respect, Andorra provided information on the proportion of waste concerned by the request that is (exported for) landfill, after treatment in Andorra. Such waste concerns the residue after thermal treatment in a dedicated energy

recovery plant. Andorra did not provide possible objectives and measures to decrease the proportion of landfilled waste.

Andorra will import waste for incineration with energy recovery (R1), and did not further provide information on the proportion of recycled waste for the waste concerned by the request. It indirectly provided possible objectives and measures to increase the rate of recycled waste in Andorra (for other types of waste).

Andorra claimed in its request that no waste is littered in the territory of Andorra, which is relatively small and easy to monitor. However, no figures or more detailed measures are provided.

The application of Andorra explained thoroughly how the capacity of the facility to treat the imported waste will balance its operations in view of ensuring the proper treatment of domestic waste, including by thorough monitoring. A specific agreement is concluded with the Spanish region of Catalunya (region from which the import will take place), including on the amounts imported.

Overall, the application of Andorra provided an excellent overview of the state of play regarding its waste generation and management, as well as its waste policy strategy.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The legal framework covering waste management in Andorra is primarily based on Law 25/2004, of December 14, on waste and Law 25/2022, of June 30, on circular economy. It is important to note that these two laws along with the National Waste Plan and the National Circular Economy Strategy are aligned with the objectives set out in the European Union waste directives (Directive 2008/98/EC on waste, IED, and others).

The application of Andorra demonstrated that its legal framework covering waste management covers permit conditions, reconsideration and update of conditions and site closure.

The application of Andorra also correctly provided information on their permitting system for waste transport as well as on its register of establishments carrying and/or transporting waste.

The application of Andorra provided explanations on how they regulate the ESM of residual waste, indicating that all such waste is typically being exported (see also section 3.1.1).

The application of Andorra comprehensively provided a list of legislation on pollution controls for waste treatment, and described its controls on water, air, and soil. The application of Andorra provided sufficient information on the treatment process (i.e. waste incineration). It also provided detailed limit values which all comply with EU limits applied through the IED. Furthermore, references to best available techniques are provided.

The application of Andorra provided a list of legislation entailing general information on protection of the environment and human health. The information submitted demonstrated

that national legislation is in place. No further details are however provided to demonstrate more specifically what structured management measures are in place.

The application of Andorra thoroughly explains their applicable procedures on import and export of waste, indicating the concerned Regulation is fully aligned with European Union legislation.

Finally, the application of Andorra provided a detailed explanation of relevant legal provisions on enforcement, inspections, and penalties.

Overall, the application of Andorra provided an excellent overview of its legal framework regarding waste management, pollution control and environmental protection.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Andorra provided evidence that it has implemented robust measures to ensure the environmentally sound management of the waste concerned by the request.

The application of Andorra correctly provided a list of legislation it has in place for both inspections and penalties and described its content in a satisfactory way for the assessment. Moreover, it provided information on the application of the legislation, such as the number of inspections conducted annually, and the penalties applied to perpetrators.

Information on the resources deployed for enforcement were not provided.

Overall, the application of Andorra provided an acceptable insight in its implementation and enforcement measures regarding waste shipments and management.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Andorra ratified 4 multilateral agreements, including the Basel Convention, but not the Stockholm and Minamata conventions, nor the ILO conventions. Nonetheless, it has voluntarily complied with the relevant provisions of all multilateral agreements and incorporated them into national management regulations.

Overall, Andorra can be assessed as sufficiently fulfilling its relevant international commitments.

I.2 Andorra: conclusions

Andorra submitted an application to import waste (including mixtures of materials) from mechanical processing of waste.

As a result of the assessment above, Andorra could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for waste (including

mixtures of materials) from mechanical processing of waste (EU list of waste code 19 12 12).

DRAFT

Annex II: Bangladesh

Bangladesh submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Bangladesh to provide additional information. Bangladesh provided more information on 29 November 2025 and 19 January 2026.

The application of Bangladesh referred to several waste codes that concern hazardous waste:

- A1160: lead acid battery scrap;
- A1120: waste and scrap of metal clad with precious metal other than gold, platinum and ash;
- A1150: PCB ash for precious metal;
- A1110: spent electrolyte from copper electro-refining;
- A1010/A1020: tellurium metallic waste and powder.

The application of Bangladesh also referred to waste batteries under Basel entry B1090. Whereas this entry in principle covers non-hazardous waste batteries, the application explicitly refers to “end-of-life lithium-ion cells/batteries” with customs code 85481090. Such waste is classified under the European List of Waste with specific hazardous codes, notably *16 06 07** (waste lithium-based batteries) and *20 01 43** (separately collected municipal waste lithium-based batteries) due to fire and explosion risks.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes above are therefore not eligible for the inclusion in the list of countries which could be authorised to export waste to the EU (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes will therefore not be considered in the assessment of the application of Bangladesh.

The application of Bangladesh further referred to electrical and electronic waste that could be classified under the code B1110. The entry B1110 was effective only until 31 December 2024 and, from 1 January 2025, non-hazardous electrical and electronic waste is to be classified under the Basel entry Y49. The European Commission assumes that the application of Bangladesh may be interpreted as covering non-hazardous electrical and electronic waste classified under code Y49. According to Article 39(1) point (c) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste will not be considered when assessing the application of Bangladesh.

The application submitted by Bangladesh covers 4 groups of eligible types of waste, namely

- Ferrous metal: B1010 and B1040;
- Non-ferrous metal: B1010/B1100, B1020, B1060, B1070, B1100, B1130, B1140, B1150, B1160, B1170;
- Paper waste: B3020;

- Rubber waste: B3040, B3080 and B3140.

II.1 Generic assessment

- a) *National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the Bangladeshi authorities provided sufficient information on their national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application by Bangladesh provided data regarding the annual quantity of total waste generated in the country on the quantities of generated waste covered by the request. It was however not explained how these data were calculated or validated.

The application by Bangladesh provided figures on the proportion of the waste separately collected for the most important types of domestic wastes (plastic, paper, glass and metal). However, the country did not provide any explanations on how to measure this proportion. Bangladesh presented four initiatives which mainly focus on enforcing and promoting sound waste treatment. However, in its application, Bangladeshi authorities indicated that none of these initiatives aim at reaching a quantitative target, rather qualitative ones, such as reporting.

To address littering, the application by Bangladesh indicated that it has implemented, or plans to implement, measures to prevent and clean up litter. These include fines, awareness campaigns, EPR, and bans on certain single-use plastics.

Finally, on ensuring that imported waste is managed in an environmentally sound manner, the application by Bangladesh specified the relevant policies and strategies, including for specific waste types. Issues linked to the import of waste are mitigated for example by implementing port screenings, EPR compliance, waste tracking pilots.

Overall, the application by Bangladesh did not explain how data are collected and validated. It only indicated that the figures are customs data, without further details.

The application by Bangladesh indicated that residual waste from recovery operations is managed by landfilling, reuse in construction, limited use as fuel, or is exported in case of hazardous waste residues. The information provided however also mentions “dumping” as a method to manage residual waste, which cannot be considered as environmentally sound.

Bangladesh as a country produced 8,000 tons of solid waste each day, treated in open landfilling without segregation, which is still the most prevalent solid waste treatment method in Bangladesh.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

In Bangladesh, registration with local authorities is a requirement for professional waste carriers and is linked to facility permitting. No comprehensive register currently exists, however.

The application by Bangladesh referred to six pieces of legislation related to the protection against harmful waste-related activities. The application by Bangladesh also explained how this legislation protects the environment and human health, especially on how they regulate:

- air pollution, banning the open burning of municipal, rubber and plastic waste, and setting emission limits for dust, SO_x, NO_x and toxic gases.
- water pollution, prohibiting waste dumping into water, banning disposal in water bodies, and setting emission limits, applying specific limit values for heavy metals, dioxins and furans, and BOD and COD limits).
- soil pollution, banning unauthorised landfilling and waste burial, as well as the import of contaminated waste, requirements for lined and sealed hazardous waste storage.

See waste-stream specific related assessment for additional elements in this regard.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application by Bangladesh adequately demonstrated the establishment of a legislative framework on enforcement, inspection and penalties. In particular, the application demonstrated equivalence with EU benchmarks, in relation to monitoring requirements, and enforcement measures that include fines and awareness campaigns. Emission monitoring is required, with results recorded and processed to verify compliance with established emission limits by the competent authorities. Penalties are designed to be effective, proportionate, and dissuasive, including fines, operational suspension, and legal action; examples include fines and shutdowns for violations. If permit conditions are breached and pose immediate danger, operations must be suspended until compliance is re-established.

However, whereas dumping is prohibited by law, the information provided mentions “dumping” as a method to manage residual waste, which cannot be considered as environmentally sound. Furthermore, details on periodic inspections for collection and transport of waste are not fully elaborated: inspections cover waste collection and transport operations, but there is no detailed evidence that such inspections cover all relevant aspects (origin, nature, quantity, destination) systematically.

Bangladesh’s application does not contain a comprehensive list of relevant treatment facilities. While Bangladesh is making efforts to enhance data collection and build a national inventory for such facilities, for all wastes concerned by the request, the application by Bangladesh stated that this information is currently unavailable. The country does not have a centralised database for recovery facilities and data fragmentation exists. Moreover, small Bangladeshi recovery facilities often operate without registration or documentation.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Bangladesh has ratified the Basel Convention and all remaining 13 multilateral agreements.

For the Basel Convention, Bangladesh did submit an annual report in 2021, and no issues were observed.

For the remaining 13 agreements, the application by Bangladesh stated that it does not have concrete data regarding the agreements' reporting or other obligations, such as evidence that reports are submitted.

II.2 Waste-stream specific assessments

For all waste types covered by the application, Bangladesh provided an adequate overview of its legal framework and supplied comprehensive details on its environmental permitting system, encompassing requirements for permit content, periodic review, and closure procedures. This includes provisions for emission monitoring and reporting. Permits are subject to regular re-evaluation.

However, Bangladesh's waste management system for the waste concerned by the request is insufficiently equivalent to EU benchmarks in relation to ensuring residual waste generated by treating the waste concerned by the request is managed in an environmentally sound manner.

Bangladesh indicated in its application that residual waste from recovery operations (e.g., metal recovery, paper pulping, rubber pyrolysis) is managed by landfilling, reuse in construction, limited use as fuel, dumping, or export for hazardous waste.

The authorities in Bangladesh have taken some steps to prevent pollution and promote resource efficiency in waste management, but targets for energy, material, or water use, are lacking. Permits cover basic requirements but exclude soil or groundwater protection and specific emission limits.

Furthermore, the implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request and any residual waste from such treatment, could be improved. Bangladesh's application addressed some essential environmental controls, but some points of attention remain. Bangladesh's application does not fully elaborate on requirements for on-site verification, operational gate checks, comprehensive record-keeping, or mandatory notification of authorities in the event of non-compliance at landfills. Additionally, the legal framework does not explicitly prohibit the landfilling of separately collected waste intended for reuse or recycling, nor does it ban the dilution or mixing of waste to meet admissibility criteria, and no reference is made to limit values for the co-disposal of non-hazardous and hazardous waste.

The information in the application showed that, while there are emission controls such as air scrubbers and bag filters, as well as emission limits for pollutants like dust and sulphur oxides, other techniques or substances are not covered. Water and wastewater management

includes measures for minimisation and reuse, but it does not mandate the full spectrum of BAT practices. In addition, more information on potential emission limit values that should be monitored for important parameters, namely heavy metals, dust, dioxins and furans, NO_x, sulphur, should be provided.

Specifically regarding ferrous metal waste and non-ferrous metal waste, Bangladesh's application is lacking a comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating metal waste. While some essential environmental controls are addressed, the application does not offer a fully comprehensive approach to best available techniques or regulatory requirements for these waste streams. The country does not provide comprehensive evidence on shredder feed stability and energy efficiency planning, recovery of secondary materials and separation techniques, energy use in secondary copper production, reduction of air and diffuse emissions, including dust, metals, and hazardous compounds, water consumption, wastewater treatment, and emissions management, environmental risk reduction in waste storage, handling, and transfer; and prevention of emissions during scrap pretreatment and thermal treatment.

Regarding waste batteries and catalysts, the application indicates that heavy metals in residues are tracked, but there is no explicit limit on organic carbon content. Bangladesh's application is unsatisfactory, as it does not provide enough evidence to ensure that the country has pollution controls in place when treating waste batteries and catalysts, such as the removal of fluids/acids from batteries, separation or safe management of mercury or cadmium during battery treatment, or evidence of batteries being removed from appliances prior to treatment requirements for impermeable surfaces, weatherproof storage, or precautions to prevent mixing batteries with conductive or combustible waste, as well as specific safety measures for lithium batteries, including orientation, ventilation, or isolation, techniques to reduce dust, metal, dioxin, PCB, or organic compound emissions (such as filters, scrubbers, adsorption, biofilter, condensation, or abatement plans), or evidence of scrap quality control, mercury removal, PCB avoidance, or diffuse dust emission prevention.

Specifically regarding waste tyres and other rubber waste, it is essential that the authorities from Bangladesh provide additional information on its strategy to improve the waste tyre management system in Bangladesh as that faces substantial challenges with both formal and informal practices.

While there is some use of waste tyres as alternative fuel in cement kilns and recycling through pyrolysis technology – reportedly producing industrial fuel and involving at least 35 operational plants – illegal dumping and open burning remain a concern, contributing to air, water, and soil pollution. While a part of the waste tyres are being processed through recycling, it remains unclear how many of these plants are permitted or not. It is also unclear as to what is happening to the greater proportion of waste tyres which are not recycled.

Bangladesh's application did not provide a full list of relevant treatment facilities. Bangladesh should continue putting efforts (supported by a national waste master plan and reforms) into enhancing data collection to build a national inventory for such facilities, for all wastes concerned by the request.

II.3 Bangladesh: conclusions

Bangladesh submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste and rubber waste.

As a result of this assessment, Bangladesh

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste and rubber waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise that it is essential that the authorities from Bangladesh provide additional information on the general strategy to improve waste management, as well as on measures taken to ensure that pollution linked to the treatment of the waste concerned is properly monitored and mitigated, including through the monitoring of all key pollutants, and to ensure a proper treatment of residual waste. Furthermore, information on enforcement of the legislation and on the treatment facilities authorised to treat the waste concerned would also need to be complemented.

Annex III: Bosnia and Herzegovina

Bosnia and Herzegovina submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Bosnia and Herzegovina to provide additional information. Bosnia and Herzegovina provided such information on 7 October 2025. Following a second request for additional information from the Commission, Bosnia and Herzegovina shared additional information on 19 January.

The application submitted by Bosnia and Herzegovina covers 25 eligible waste codes. Instead, 6 waste codes were found not eligible for export under the Waste Shipment Regulation because they refer to plastics. The application submitted 6 specific types of waste, namely ferrous metal waste, non-ferrous metal waste, paper waste, rubber waste, RDF and textile waste. The application specified these types of waste with the following customs codes:

- Ferrous metal waste: EU List of Waste codes: 120101, 120102, 150105, 160117, 170405, 191202;
- Non-ferrous metal waste: 110501, 120103, 120104, 160118, 160216, 170401, 170402, 170406, 170404, 170411, 191002, 191203;
- Paper waste: 150101, 200101, 191201;
- Rubber waste: 160103 (end-of-life tyres);
- RDF: 191210 (refuse derived fuels);
- Textile waste: 200111.

For the purpose of establishing the list of countries in accordance to Article 41 of the Waste Shipment Regulation, the following corresponding Basel Convention entries are identified:

- Ferrous metal waste: B1010, B1200;
- Non-ferrous metal waste: B1010, B1030, B1031, B1080, B1100, B1150;
- Paper waste: B3020;
- Rubber waste: B3140;
- Textile waste: B3020.

No corresponding Basel entry exists for RDF.

III.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Bosnia and Herzegovina provided annual figures for total waste generation, however no 10-year projection for total waste generation is provided. The request only provides a general expectation of an increase in waste generation over the next five years, without precise estimations or a detailed methodological explanation of how data are collected or validated.

The application did not provide an estimate of the total waste treatment capacity in the country, nor estimates regarding the development of waste treatment capacities over the next 10 years.

For the main categories of recyclable waste, Bosnia and Herzegovina provided information on the proportion of separately collected waste (paper, plastics, metals, glass, wood, e-waste, textiles). The request also outlines objectives and measures to increase the proportion of separately collected waste in the future, including the implementation of waste management plans, new financial mechanisms and the strengthening of domestic institutions.

The application of Bosnia and Herzegovina further outlined several strategic objectives and measures aimed at decreasing the rate of landfilled waste, including harmonisation of domestic legislation with the EU waste legislation, establishment of separate collection systems for specific waste streams, and remediation of illegal dumpsites.

The application of Bosnia and Herzegovina confirmed that no official data is available concerning the amount of waste that is recycled and offered an overview of the total waste that is recovered and disposed in the country, both generated domestically, imported and temporarily stored. In terms of objectives and measures to increase recycling in the future, Bosnia and Herzegovina highlighted waste management plans to strengthen the waste recycling market, optimization of waste management and separate collection of municipal waste. Furthermore, no figures are provided on the quantity of waste that is littered, but the Bosnia and Herzegovina measures to address littering, focusing particularly on the prevention and clean-up of litter. Furthermore, Bosnia and Herzegovina indicated that it aims to establish regional sanitary landfills and upgrade existing ones to meet strict sanitary standards, in order to reduce the proliferation of illegal dumpsites.

Finally, Bosnia and Herzegovina's application provided comprehensive quantitative data on imported waste for the years 2019–2023, broken down by waste types: metals, textiles, paper, and plastics. The response outlined the management of imported waste, indicating that such waste is either processed and recovered domestically or re-exported. Bosnia and Herzegovina stated that authorized facilities process the collected waste, and the majority is either exported or managed within the country, with only small quantities imported to meet domestic processing needs.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Bosnia and Herzegovina provided specific information on permitting for waste treatment facilities, as well as on the licensing regime applying to the transport of waste. Waste transporters are obliged to obtain a permit for waste management and keep records of each transport.

Bosnia and Herzegovina's application contains a general description of other relevant environmental legislation on waste management and to protect air, soil and water, and provides a long list of legal acts in these fields. This includes requirements applying to the management of residual waste and for pollution controls.

Overall, additional information is needed to fully assess if this legislation is equivalent to EU standards. For example, the information provided shows that there are conditions

linked to pollution control measures which are enshrined in the permits of individual facilities but does not specify the level of emission limits for pollutants applying to industrial facilities processing waste (ie recycling facilities or facilities using waste to produce energy or heat, such as incinerators or cement kilns). The application also indicates that new requirements are being considered to determine the quantities and composition of waste destined to landfilling, but it is not clear if and when these requirements will become applicable.

The application of Bosnia and Herzegovina provided an explanation of the legislative and enforcement framework related to waste management. The request provided a detailed explanation of relevant legal provisions on enforcement, inspections, and penalties.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Bosnia and Herzegovina provided evidence of legislative provisions mandating inspections for waste management and transboundary shipments. The response demonstrated a clear legal framework for penalties, detailing administrative and misdemeanour measures for violations of waste management and shipment regulations.

The application outlined a framework for inspection planning (including risk-based targeting and coordination mechanisms), but also acknowledged a lack of consolidated, publicly available national statistics on the number of inspections conducted. The application acknowledges challenges such as the need to strengthen inspection capacities and data collection. More information should be gathered on the number of penalties imposed for breaches of the legal framework applying to waste management.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Bosnia and Herzegovina has ratified the Basel Convention, and 12 of the 13 other relevant multilateral agreements. The Minamata Convention was not ratified nor signed but the competent authorities address its provisions and intend to start ratification by the end of 2025.

The application provided evidence that the country complies with its reporting obligations under the Basel Convention. It did not provide sufficient evidence that the country meets the reporting and other obligations to some of the multilateral agreements, as the application only provided high-level information or merely links to conventions' websites. Following desk research, it appears that Bosnia and Herzegovina does not comply with its reporting obligations in due time for the Stockholm Convention and the Paris Agreement.

Finally, the compliance with the remaining obligations was checked and no issues were observed.

III.2 Waste-stream specific assessments

The application of Bosnia and Herzegovina provided the annual quantity of waste concerned by the request generated in the country for paper waste, metal waste and textile waste. However, the application falls short of providing the treatment and processing capacities, 10-year projections on how much waste concerned by the request will be generated in the country, 10-year projections of the country's treatment capacity or the proportion of domestic waste subject to the request that is recycled. For rubber waste and RDF, more information on the annual quantity of that specific waste stream generated in the country should be gathered.

The country's application provided a general description of its legal framework, implemented to ensure that residual waste generated by treating the waste concerned by the request is managed in an environmentally sound manner. The application provided good insight in the country's system for permitting of waste treatment facilities with details on its permitting system, as well as a comprehensive outline of landfill waste acceptance criteria. However, more information regarding the measures to control and limit pollution during the treatment of the waste concerned by the request should be gathered.

Specifically regarding RDF, it is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

Regarding ferrous and non-ferrous metals, Bosnia and Herzegovina's application remains insufficient, as it does not clearly demonstrate the measures in place to control and limit pollution during the treatment of ferrous and non-ferrous metal waste. The application shows that some rules exist to reduce environmental risks in handling and transfer, including competency and documentation requirements, procedural elements such as validation and verification, spill prevention, and the use of vehicles and containers that prevent spillage, leakage, and dust release during transport. Facilities must also implement measures to prevent pollution, including dust emissions.

However, the application does not demonstrate broad equivalence with EU benchmarks in several key areas. In particular, it does not provide detailed legal requirements or techniques for reducing environmental risks during waste storage. For non-ferrous metals, it also does not provide evidence of measures to prevent diffuse emissions during scrap pretreatment, for example through enclosure and extraction systems. In addition, while the application mentions emission limit values for pollutants such as dust, SO₂, NO_x, heavy metals, dioxins and furans, it does not refer to other relevant parameters such as total organic carbon (TOC), total volatile organic compounds (TVOC), hydrogen chloride (HCl), or hydrogen fluoride (HF).

The country provided a list of facilities authorised to treat the waste subject to the request.

III.3 Bosnia and Herzegovina: conclusions

Bosnia and Herzegovina submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste, rubber waste, RDF and textile waste.

As a result of this assessment, Bosnia and Herzegovina

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, rubber waste, refuse-derived fuel and textile waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Bosnia and Herzegovina to demonstrate which measures are being taken to ensure that all pollution linked to waste management facilities for the requested waste is being properly monitored and mitigated, including through monitoring of all key pollutants. Additional information on the implementation and enforcement measures linked to breaches of environmental legislation in the waste sector is also essential.

Annex IV: Egypt

Egypt submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Egypt to provide additional information. Egypt provided such information on 30 September 2025 and 8 January 2026.

The application of Egypt referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Egypt.

Further, the following waste was indicated in the application of Egypt: “Slaughterhouse waste (Leather, intestines, wool, bones, horns, hooves, fur, hair...) - Subject to the veterinary quarantine codes and/or standards in the country of origin and the country of import.” This material is considered under the applicable legislation concerning animal by-products and is not covered by the EU rules on waste shipments. Trade in animal by-products obtained in slaughterhouses is subject to animal health rules. The EU legislation on animal by-products ⁽¹⁰⁾ lays down public health and animal health rules for animal by-products to prevent and minimise risk to public and animal health arising from those products.

The application submitted by Egypt covered 8 eligible types of waste:

- Ferrous metal waste: B1010 and B1200;
- Non-ferrous metal waste: B1010, B1020 and B1050;
- Paper waste: B3020;
- Textile waste: B3030;
- Rubber waste: B3040, B3080 and B3140;
- Wood waste: B3050;
- Glass waste: B2020;
- Organic and agro-food waste: B3065.

IV.1 Generic assessment

- a) *National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of Egypt provided some information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

⁽¹⁰⁾ Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC ([OJ L 229, 1.9.2009, p. 1](#)).

The application of Egypt did not provide information on the quantity of waste imported to its territory, and on its strategy for ensuring that waste imported into its territory is managed in an environmentally sound manner or will not negatively impact the management of domestically generated waste.

The application of Egypt provided data on quantities of waste that are generated, separately collected, treated or littered, as well as waste treatment capacity. However, it did not sufficiently explain how such data were collected or validated.

The application of Egypt provided information on their objectives and measures for increasing the proportions of the most important domestic waste types separately collected, as well as possible objectives and measures to decrease the rate of landfilling in the future.

The application of Egypt indicated an overall waste treatment capacity but did not specify such capacity for all specific waste types concerned by the request. Also, it was not sufficiently explained whether the available treatment capacity would at least cover the waste generated in the country.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Egypt's legal framework requires that any entity engaged in the management of non-hazardous waste, including transport, must obtain a license issued by the competent authority. This implies at least registration with the authority for professional waste carriers. In addition, the application of Egypt described the existence of a national Waste Information Management System (WIMS), where companies/facilities involved in collection, transport, treatment, landfilling, imports/exports, etc., are required to register and report operational data. The system is maintained by the competent authority and supports licensing and permits, indicating that a register exists and can be provided.

The legal framework in Egypt mandates periodic monitoring and inspections of waste management subjects, collection, and transport operations, with the frequency determined by the competent authority and specified in permits or binding rules. Both routine and non-routine inspections are conducted to ensure compliance and investigate breaches, covering all relevant environmental impacts. Inspections also address the origin, nature, quantity, and destination of waste.

Littering and waste dumping are strictly prohibited, with penalties in place for violations. Operators are obliged to take appropriate measures in case of incidents or accidents affecting health or the environment, and are subject to penalties including fines, facility closure, and suspension of operations if breaches pose immediate danger, until compliance is restored.

The application of Egypt indicated two pieces of legislation governing the import and export of waste concerned by the request, indicating that importers in Egypt must obtain prior authorisation before importing non-hazardous waste.

The application of Egypt did not detail the rules for notification, consent, transboundary movement, or confirmation of treated waste, nor did it mention the requirement to inform on the type and quantity of waste, the proposed route, the treatment facility which will receive the waste, and the exporter's details. Also, the application of Egypt indicated that

Egypt's competent authority does not oversee the implementation of detailed provisions regarding import/export processes, including notification and consent procedures.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Egypt provided information on the implementation and enforcement of their national legislation on waste management.. However, the application did not provide quantified data (such as statistics) regarding the implementation of the inspection measures foreseen in its domestic legislation.

Egypt's legislation has adopted an extensive set of penalties, including fines, imprisonment, closure of facilities, confiscation of vehicles/equipment, re-export obligations, and liability for cleanup costs. It includes fines from EGP 20,000 to EGP 25,000,000 depending on the offense, and imprisonment for serious offenses (e.g., hazardous waste dumping). Regarding the implementation of penalties, the application of Egypt did not provide specific data on the number or size of penalties imposed for violations related to waste shipments. No detailed information was made available on how often penalties are applied or on the outcomes of enforcement actions.

The application of Egypt provided information of registered facilities, including the name, address, permit number and the types of waste concerned by the request that the facilities are authorised to recover.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Egypt has ratified the Basel Convention and provided evidence that the country complies with the reporting obligations of the Basel Convention. No issues were observed regarding compliance with other obligations under the Convention.

Egypt ratified 12 of the 13 other multilateral agreements.

Egypt did neither ratify, nor signed, the Minamata Convention on Mercury. In its explanation, Egypt anticipates accession to the Minamata Convention on Mercury by the end of 2026, indicating a commitment to ratifying the Convention within a specific timeframe. Although Egypt has not yet ratified the Convention, it outlined several key activities being undertaken to align with its provisions.

Overall, Egypt largely fulfils its relevant international commitments.

IV.2 Waste-stream specific assessments

Ferrous metal waste and non-ferrous metal waste

The application of Egypt did not provide data on the proportion of metal waste that is recycled and referred to a lack of data. The application of Egypt did indicate it is taking measures to increase the rate of recycled metal waste, such as integrating informal scrap

dealers into a formalised system, establishing tracking systems, and developing partnerships between smelters and international recycling operators.

As regards permit content and requirements, general obligations were described by the application of Egypt, but specific conditions, such as emission limits, soil and groundwater protection, monitoring, reporting, maintenance, abnormal operations, compliance assessment, and hazardous substance management are not mentioned. Furthermore, there is no mention of periodic reconsideration or updating of permits.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not sufficiently demonstrated.

The application of Egypt did not provide any emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, SO₂).

Paper waste

The application of Egypt provided information on the proportion of the paper waste that is recycled (50%), along with measures to be implemented to increase this proportion, such as expanding separate collection programmes, introducing mandatory recycling targets for packaging, supporting recyclers financially and administratively. The application of Egypt did not sufficiently provide quantifications for paper waste generation, treatment capacity, landfilling, recycling, littering, and imports from the EU.

As regards residual waste management, there is no mention in the application of permit specifics for incineration/co-incineration plants, conditions for thermal treatment of incineration gases, or limits on organic carbon in slag or bottom ashes.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not sufficiently demonstrated. The specific technical standards, procedures for handling waste, and quality assurance – especially for paper mills – could be better addressed. The lists of authorised waste treatment facilities were provided but more data on their treatment capacities should be gathered.

The application of Egypt did not provide any emission limits and did not indicate whether critical substances are controlled by establishing emission limits (e.g. Heavy metals, dust, dioxins and furans, NO_x, SO₂).

Textile waste

Concerning textile waste, the application of Egypt overall described its national waste management strategy and plan. Nonetheless, more quantifications for textile waste generation, treatment capacity, landfilling, recycling, littering, and imports from the EU should be gathered.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not sufficiently demonstrated.

The application of Egypt did not provide emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, SO₂).

Rubber waste

Concerning rubber waste, the application of Egypt overall described its national waste management strategy and plan.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not sufficiently demonstrated.

The application of Egypt did not provide emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, sulphur dioxide).

Specifically regarding waste tyres, a 2016 report estimated that Egypt produced 315,000 tonnes of scrap tyres in 2015 ⁽¹¹⁾. It remains a point of attention to gather more insights on what is the fraction of waste tyres utilized by cement companies, and what are actual recycling rates ⁽¹²⁾.

Wood waste

Concerning wood waste, the application of Egypt overall described its national waste management strategy and plan. However, the application of Egypt did not provided sufficient quantifications for wood waste generation, treatment capacity, landfilling, recycling, littering, and imports from the EU.

Procedures for recycling incineration residues could be better described. A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not sufficiently demonstrated.

The application of Egypt did not provide emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, SO₂).

⁽¹¹⁾ [ICF \(2016\) Unlocking Value: Alternative Fuels for Egypt's Cement Industry](#)

⁽¹²⁾ [General Authority for Investments and Free Zones \(2021\) The Opportunities in Chemical Recycling of Tires in Egypt](#)

Glass waste

The application of Egypt provided information on the proportion of glass waste that is recycled (30%), along with measures to be implemented to increase this proportion (50% by 2030), such as providing fiscal incentives to manufacturers, implementing “deposit-return” schemes for glass containers, and enhancing collection and sorting to separate clear and coloured glass.

More information on permit requirements, monitoring systems, waste acceptance criteria, and technical standards should be gathered. Also more information is needed to fully demonstrate equivalent mechanisms for ensuring safe disposal and recycling, as well as necessary controls and prohibitions to prevent improper landfill practices.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not fully demonstrated.

Additionally, there is no requirement to control or select input materials for glass melting furnaces to minimise emissions, nor evidence of measures to reduce metal emissions or utilise filtration systems in glass production.

The application of Egypt did not provide emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, SO₂).

Organic and agro-food

The application of Egypt provided information on the proportion of food and green waste that is recycled (10%), along with measures to be implemented to increase this proportion (25% by 2030), such as separating food and green waste, providing technical training to authorities and small companies on the related waste processing technologies.

A comprehensive and detailed implementation to ensure that the country has pollution controls in place when treating the waste concerned by the request regarding energy efficiency, emissions to air (general abatement), to water, and to air, and process-specific controls was not fully demonstrated.

The application of Egypt did not provide emission limits and also did not indicate whether critical substances are controlled by establishing emission limits (e.g. heavy metals, dust, dioxins and furans, NO_x, SO₂).

IV.3 Egypt: conclusions

Egypt submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste, textile waste, rubber waste, wood waste, glass waste and organic and agro-food waste.

As a result of the assessment above, Egypt

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, textile waste, rubber waste, wood waste, glass waste and organic and agro-food waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the Egyptian authorities to provide additional information on (i) the implementation of measures to improve separate waste collection, reduce landfilling and increase recycling capacity for the requested waste streams, (ii) permit or registration obligations for the collection, transport, or treatment of non-hazardous waste, (iii) enforcement of the inspections and penalties related to waste shipments and management, and (iv) measures taken to ensure proper monitoring and mitigation of the air, soil and water pollutions related to the treatment of the waste concerned and its residual waste.

Annex V: El Salvador

El Salvador submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited El Salvador to provide additional information. El Salvador provided such information on 17 September 2025. Following a second request for additional information from the Commission, El Salvador shared additional information on 10 January.

The application submitted by El Salvador covered one type of waste: paper waste (B3020).

V.1 Generic assessment - Waste-stream specific assessment

As the request concerned only one specific type of waste to be imported to one specific facility, the assessment of the criteria related to the overall situation of waste management in the country and of the criteria that are specific to the type of waste that the country wishes to import from the EU, are assessed together below.

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application provided insufficient information on the country's national waste management strategy or plan.

The application provided the quantity of municipal waste generated in the country, but no projections for the future. Furthermore, it did not provide information on the country's waste treatment capacity. Moreover, it indicated that as recovery in the country is still informal, there is no data on waste recovery and recycling in the territory.

The application indicated the amount of paper waste disposed of in landfills and the source of this data. On the other hand, it indicated that there is no specific updated data on the amount of waste that is dumped.

The request provided information on amounts of paper waste imported as received from companies treating the waste. It was not possible to verify if the amounts provided correspond to available data on waste imports, because the information provided is disaggregated by treatment facilities, covering different countries of origin and reporting periods.

The application did not provide information on how the quantities of paper waste generated in the country will develop in the next 10 years. An estimate of the country's treatment capacity for paper waste was also not provided and neither was comprehensive information on the proportion of domestic waste concerned by the request that is recycled.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application did not demonstrate a comprehensive legal framework for permitting of waste treatment facilities. For paper waste, the application indicated that the country does not yet have the installed recycling capacities. Current legislation in El Salvador establishes requirements for obtaining permits, rules for closing facilities, and other regulatory obligations related to permits, licenses, and registrations. Nonetheless, information on specific permit content requirements, periodic reconsideration of permits, landfill and incineration specific permitting rules are not elaborated upon.

The application insufficiently indicated that the residual waste generated through the recovery operation for the waste concerned by the request is managed in an environmentally sound manner. The application only partially demonstrated that it fulfils key waste management criteria, though detailed operational standards are still in development. Landfill waste acceptance criteria are mandated, but essential national lists and testing levels are lacking, and operational procedures for ensuring that only compliant waste is accepted remain incomplete. Furthermore, emission limit values on key pollutants that are important to monitor when treating residual waste are not addressed in detail.

El Salvador's application set out clearly the permitting, licensing and registration system for waste treatment facilities and the transport of waste. El Salvador indicated two pieces of legislation that regulate the national transportation of waste. It further explained that within the regulatory framework, all waste managers must be authorised in accordance with current regulations. Likewise, all establishments that transport waste must be authorised for the specific activity of transport and specify their registration by the type and quantity of waste managed. Services for the transport of waste may only be provided by authorised and duly registered actors, and that importers must register and regularly report the volumes and types of recyclable materials imported.

The application insufficiently demonstrates that domestic legislation provides an equivalent level of protection of the environment and human health in the context of waste management operations. The application explained that it establishes comprehensive measures for the protection of air, soil, water, and human health in waste management, although these were not described in detail. There is no explicit mention of comprehensive air pollution legislation, such as regulations on ambient air quality, pollutant emission limits, or monitoring requirements. The evidence provided is limited to landfill gas management and does not encompass broader air pollution control measures. The application does not reference legislation covering water quality standards, pollutant discharge limits, or broader water protection measures. The evidence is limited to landfill operations and lacks detail on national water pollution legislation. Furthermore, there is no reference to comprehensive soil protection legislation, such as regulations on soil quality standards, remediation of contaminated sites, or monitoring programs. The evidence is limited to engineering controls at landfill sites.

The application provided a comprehensive explanation of its domestic legislation on the import and export of the relevant waste. To ensure sound management of paper waste intended for recycling, El Salvador requires importers to comply with several requirements, including prior authorisation, no-risk declaration, registration and information, and submission and approval of a comprehensive waste management plan. These steps broadly align with the Prior Informed Consent procedure as referred to in Article 6 of the Basel Convention.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application presented the strategy for the enforcement of domestic legislation on waste management and waste shipment. The application presented partial evidence of practical implementation of enforcement measures, through the description of the organisational structure of its national waste management authority (ANDRES), including dedicated units for inspections. However, while the framework and responsibilities are clear, the text lacks quantitative data or detailed examples of inspection frequency, methodologies how to record such inspections or checks, or outcomes of enforcement action.

In addition, the specific regulatory framework, “Ley Especial de Aprovechamiento, Recolección y Disposición Final de Residuos”, establishes the creation of the Sanctioning Tribunal, whose attributions include requesting the competent authority to revoke and cancel authorisations, permits, and registrations, analysing and validating technical and expert reports on damage to the environment and, where appropriate, on the restoration or compensation for such damage or the adverse effects. The Tribunal’s ability to take interim measures and its permanent status indicate a functioning enforcement mechanism. However, the application does not provide concrete data or specific case examples of penalty application, such as the number or types of sanctions imposed.

The explanation of the provisions on enforcement, inspection and penalties is insufficient. The application did not provide explanations regarding several key aspects of environmental enforcement and monitoring. Specifically, it did not clarify whether there is a set frequency for periodic monitoring by the competent authority, nor did it detail the existence of a structured and systematic environmental inspection system. The application also omitted information on non-routine inspections to address cases of non-compliance, periodic inspections of waste collection and transport operations (including their origin, nature, quantity, and destination), and the monitoring of emissions with proper recording for compliance purposes. Furthermore, there was no explanation of measures in place for incidents or accidents that have environmental or health impacts, nor on the prohibition of littering and illegal dumping with associated penalties.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

El Salvador has ratified the Basel Convention and provided evidence that it complies with obligations under that Convention.

All other relevant multilateral agreements are ratified, except for the Paris Agreement (to which El Salvador is a signatory however). The application did not explain why the country has not ratified the Paris Agreement, whether it plans to ratify it in the future, nor whether it is implementing its provisions.

El Salvador provided detailed explanations of how several multilateral agreements have been integrated into domestic legislation and government’s actions.

V.2 El Salvador - conclusions

El Salvador submitted an application to import paper waste.

As a result of the assessment above, El Salvador could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

Annex VI: Georgia

Georgia submitted its application on 13 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Georgia to provide additional information. Georgia provided such information on 29 September 2025. Following a second request for additional information from the Commission, Georgia shared additional information on 13 January 2026.

The application submitted by Georgia covered 8 types of waste, eligible under Title IV of the WSR:

- Ferrous metal waste: B1010, B1200;
- Non-ferrous metal waste: B1010, B1020, B1115, B1130;
- Paper waste: B3020;
- Wood waste: B3050;
- Textile waste: B3030;
- Organic and agro-food waste: B3060;
- Mineral waste: B2040, B2050;
- Glass waste: B2020.

VI.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, more information is needed on the country's national waste management strategy and plan. The application reports the total amount of municipal waste generated and the percentage of the waste concerned by the request; however, it does not provide the overall quantity of total waste generated. No information was provided on projections for the next 10 years. As for the methodology, it listed the competent authorities responsible for data collection but it did not explain the methodology, verification, and validation processes for data or statistics.

The application did not provide an estimate of the country's current treatment capacity for waste in general, nor for the waste concerned by the request. No projections for the next 10 years were included, and no methodology was provided on how data are collected and validated.

The application described the objectives and measures aimed at increasing the proportion of separately collected waste. It provided data on the quantities of waste that were separately collected in 2024 but did not provide the overall proportion of domestic waste that is separately collected.

The application outlined objectives and measures aimed at increasing the rate of recycling of the waste concerned by the request, stating that the waste it wishes to import is entirely intended for recovery. However, the country indicated that data on the proportion of domestic recycled waste "are not available at this stage" and provided no additional quantitative information.

Georgia provided information on littered waste, explains the methodology used to obtain this data, and described measures taken to prevent and clean up litter. It furthermore reported the annual quantity of the waste concerned by the request that was imported in 2024 and 2023 and explained the methodology used to collect this data. The country also provided detailed information on its strategy to ensure the environmentally sound management of imported waste and clarified how imported waste will not negatively impact the management of domestically generated waste.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Georgia provided a comprehensive explanation of its permitting, licensing, and registration systems for waste transport. It specified that any establishment intending to carry waste on a professional basis must be registered with the competent authority and that a comprehensive register covering all establishments carrying or transporting waste is maintained.

The application of Georgia supplied adequate information on how its waste management legislation ensures the protection of air, water, and soil. The application clarified that national technical regulations establish binding emission and discharge limit values for major pollutants, mandate control systems such as leachate treatment and gas capture, and require continuous monitoring to prevent contamination. Georgia's application also demonstrated that enforcement is ensured through permitting, registration, inspections, and administrative liability, while coordination with the Environmental Assessment Code and sectoral laws on air, water, and soil protection guarantees integrated cross-media safeguards.

The information provided regarding domestic legislation on the import and export is satisfactory. Georgia highlighted the requirements for notification, consent, and transboundary movement of waste, confirming that corresponding national rules are in place and operational. It included detailed provisions for notification and consent stages, but no information was provided on the confirmation of the treatment of waste, leaving this aspect incomplete.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Georgia provided sufficient information regarding its strategy for the enforcement of domestic legislation on waste management and waste shipment. The application presented a detailed enforcement framework, supported by the Waste Management Code, the Law on Environmental Supervision, and related by-laws, which clearly define inspection mandates, procedures, and sanctioning powers. Inspections are conducted under annual and risk-based plans and may include both scheduled and unannounced visits. Implementation is demonstrated through quantitative data on inspections, references to laboratory analyses, and statistics on administrative offence cases. The country also outlined a comprehensive system of administrative and criminal penalties, including categories of offences and corresponding fines, with examples confirming that sanctions are applied in practice and are proportionate and dissuasive. However, no specific evidence of systematic follow-up to ensure correction of violations,

nor details on spot checks of waste recovery operations or the frequency of physical inspections of transboundary waste shipments was provided.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Georgia has ratified the Basel Convention and provided evidence that the country complies with the reporting obligations of the Basel Convention. Furthermore, Georgia provided detailed explanations of how all other multilateral agreements have been integrated into domestic legislation and government's actions. National reports are regularly submitted.

The compliance with all other obligations was checked and no other issues were observed.

VI.2 Waste stream specific assessments

For each waste stream subject to the application, Georgia provided the proportion of domestic waste concerned by the request that is landfilled and the related methodology for collecting and validating data. However, the application falls short of providing sufficient information such as estimates of the annual quantity of waste concerned by the request generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity for the waste concerned by the request, and the proportion of domestic waste concerned by the request that is recycled.

The application of Georgia presented a comprehensive overview of its permitting framework, covering permit content requirements, environmental information and reporting obligations, and emergency planning through environmental impact assessment procedures and technical regulations. Landfill permits are detailed in technical regulations specifying operational and technical standards, monitoring and control arrangements, and closure obligations. Requirements for waste treatment facilities are further defined through national waste management rules and associated technical regulations, which require documentation of waste types and quantities, operational procedures, monitoring methods, safety measures, and closure arrangements. However, the application included no explicit mention to periodic permit review, nor to obligations that demonstrate technically competent management, provisions for financial guarantees for closure and after-care, or mandatory pre-operational inspection prior to commencing disposal activities.

The application of Georgia provided an acceptable description of Georgia's legislative measures and requirements which ensure that residual waste generated through the recovery operations of the wastes concerned by the application are managed in an environmentally sound manner. The information provided demonstrates compliance with several key elements, including detailed permit content requirements, preventive measures against pollution and accidents, landfill closure and after-care obligations, and requirements for waste characterisation, acceptance procedures, and testing.

However, the provided framework does not explicitly prohibit the landfilling of separately collected waste intended for reuse or recycling, nor does it ban the dilution or mixing of waste to meet admissibility criteria. In addition, there are no explicit requirements for

continuous operational monitoring of landfills, annual compliance testing of accepted waste, or limit values for granular non-hazardous waste co-disposed with hazardous waste.

More information should be gathered to assess Georgia's implementation of pollution control. While the framework presented in the application refers to certain measures to reduce air emissions, regulate wastewater discharges, and limit environmental risks associated with waste storage, handling, and transport, points of attention remain. Requirements for energy efficiency planning, energy balance records, or the application of energy optimisation techniques across industrial processes should be further demonstrated. Information on quantitative emission limit values for all relevant pollutants should be provided.

Georgia's application remains insufficient for both ferrous and non-ferrous metal waste, as the framework does not demonstrate a sufficiently complete set of measures to control and limit pollution during treatment. For ferrous metal waste, although the framework refers to measures to reduce air emissions of dust, metals, dioxins, and PCBs through abatement equipment, filters, and gas control systems, as well as controls on wastewater discharges and environmental risks linked to storage, handling, and transport, it does not include provisions requiring a stable shredder feed linked to energy efficiency, obligations to maintain an energy efficiency plan or energy balance records, or quantitative emission limit values for the treatment process. For non-ferrous metal waste, the shortcomings are broader. In addition to the gaps identified for ferrous metals, the framework does not address measures to increase the recovery of secondary materials through separation techniques, energy-efficient practices in secondary copper production, or the prevention of diffuse emissions during scrap pre-treatment. It also fails to provide quantitative emission limit values for the treatment of non-ferrous metal waste and does not explicitly cover several relevant pollutants, resulting in an overall low level of technical and environmental control.

Georgia provided a list of facilities authorised to treat the waste subject to the request.

VI.3 Georgia: conclusions

Georgia submitted an application to import ferrous metal, non-ferrous metal, paper, wood, textile, organic and agro-food, mineral, and glass waste.

As a result of this assessment, Georgia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper, wood, textile, organic and agro-food, mineral, and glass waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Georgia to demonstrate, in particular, which measures are being taken to ensure that there is available treatment capacities for each of the requested waste streams, that all pollution linked to waste management facilities for the requested waste is being properly monitored and mitigated, including through quantitative emission limits and the monitoring of all

relevant pollutants, and that there is systematic follow-up to ensure correction of violations and the frequency of physical inspections. Although paper, wood, textile, organic and agro-food, and glass waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these wastes is ensured in the country.

Annex VII: Hong Kong Special Administrative Region (HKSAR)

HKSAR submitted its application on 12 May 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Hong Kong to provide additional information. HKSAR provided more information on 3 September and 23 December 2025.

The application submitted by HKSAR covers 2 groups of eligible types of waste, namely

- ferrous metal: B1010 and
- non-ferrous metal: B1010, B1020 and B1050.

VII.1 Generic assessment - Waste-stream specific assessment

HKSAR's request concerns two specific types of waste to be imported to one specific facility. Hence the assessment of the criteria related to the overall situation of waste management in the country and of the criteria that are specific to the type of waste that the country wishes to import from the EU, are assessed together below.

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of HKSAR provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application of HKSAR provided data regarding the annual quantity of total waste generated in the country. These data show a measurable downward trend in both overall quantities and daily waste disposal over recent years. HKSAR also provided an outlook on how the generation is going to develop in the following 10 years.

The application of HKSAR provided data on the treatment capacity that is available and also provided clear projections for the next decade, demonstrating that treatment capacity will exceed 9 million tonnes per year once two large waste-to-energy facilities become operational and landfill extensions are completed. The application of HKSAR demonstrated that it has sufficient capacity to treat properly all waste generated domestically.

The application of HKSAR presented data on the proportion of waste that is separately collected, indicating that 33% of municipal waste is recycled and providing recycling rates for key waste streams, including a rate of 93% for metals. The application of HKSAR also outlined an extensive set of objectives and measures designed to increase separate collection and improve recovery.

The application of HKSAR indicated that 7% of domestically generated non-hazardous metal scrap is landfilled and also outlined the intention to further reduce this rate by

promoting increased recycling of metal scrap, through a number of well-identified measures.

The application of HKSAR provided information on how they address littering. The collection of municipal and street waste was demonstrated, supported by precise figures on the number of public refuse collection points, litter bins, and daily quantities of waste collected. In addition, specialised arrangements for marine refuse collection are described.

The application of HKSAR quantified the total imported waste in 2024 (790,000 tonnes) and explained that import declarations provide accurate and complete data on the nature, quantity, origin, and destination of the waste. The application of HKSAR also clarified that all government-operated treatment facilities handle only domestically generated waste and possess sufficient capacity to ensure that imports do not impact domestic waste management. The treatment of the waste concerned by the request and imported to Hong Kong, will be managed in a dedicated facility to be established in the short-term. The application of HKSAR provided information regarding the company that will manage the facility and the capacity that will be permitted.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of HKSAR demonstrated that all carriers must adhere to general transport regulations. The application of HKSAR stated that it does not maintain a comprehensive register covering all establishments carrying/transporting metal waste, as it only maintains it for facilities handling chemical waste.

The application of HKSAR demonstrated a that they apply a legal framework for permitting of waste treatment facilities. It explains that Specified Process Licences and Wastewater Discharge Licences include emission limits, monitoring duties, reporting obligations, maintenance requirements, and conditions for abnormal operations, and that both licences undergo periodic reconsideration through fixed validity periods. It also confirms that operation without the relevant permits is prohibited, that landfill permits define authorised waste types and monitoring systems, and that permits for the proposed facility specify waste types and quantities, technical and operational requirements, and relevant after-care provisions.

However, the application of HKSAR did not demonstrate that permits explicitly include conditions on definitive closure, particularly regarding the removal, control, or containment of hazardous substances.

The application of HKSAR provided detailed information, demonstrating the application of permitting requirements, preventive measures against pollution and accidents, waste characterization provisions, and operational monitoring of landfills through composition and leaching analyses in independent laboratories, which also establish limit values for different types of non-hazardous waste.

However, the application of HKSAR did not provide information on landfill waste acceptance criteria, documentation and inspection systems at landfill gates, bans on landfilling separately collected recyclable waste, landfill closure and after-care rules, and annual compliance testing.

The application of HKSAR provided detailed information regarding measures taken on stable shredder feed optimization, full energy-efficiency planning, robust controls on air emissions, and extensive measures to optimize water use and treat wastewater in line with EU BAT requirements. It also presented strong environmental risk-reduction measures for the storage, handling and transfer of waste, supported by impermeable surfaces, secondary containment, documented procedures and competent staff. Furthermore, Hong Kong provided a clear framework for controlling scrap quality and preventing diffuse dust emissions through enclosed systems, extraction units and operational controls.

However, the application of HKSAR did not mention all relevant key pollutants for the treatment of ferrous metal waste, notably total organic carbon (TOC), chemical oxygen demand (COD), and total volatile organic compounds (TVOC). HKSAR stated that it is planning to implement Best Available Techniques and emission limit values for the facility designated to treat the waste concerned by the request.

The application of HKSAR stated that their controls regarding the import of waste incorporated the Basel Convention's Prior Informed Consent (PIC) procedure. It confirmed that all Basel-controlled waste movements are regulated under the Waste Disposal Ordinance, with permits issued only when shipments meet environmentally sound management requirements based on relevant Basel technical guidelines. It also explained that non-hazardous metal scrap, although not covered by Basel, is still subject to import permit controls unless contamination is below 1%, and that permits are granted only when processing meets all environmental legislation.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

All waste imported from the EU will be treated exclusively by one facility, which is currently under construction which is indicated to become operational in 2026 with an authorised treatment capacity of around 30,000 tons of metal scrap (both ferrous and non-ferrous) per year. The application of HKSAR did not provide the permit number but clarified that no permits or licenses have been issued yet and that these will be obtained before the start of operations.

The application of HKSAR stated that waste management and transportation are regulated by the Waste Disposal Ordinance (Cap. 354), with enforcement and monitoring conducted by the Environmental Protection Department (EPD). The EPD employs a multi-faceted approach, including inspections, surveillance, and partnerships with stakeholders to ensure compliance with environmental laws. Over the past five years, the EPD has conducted over 12,000 inspections and completed more than 900 prosecutions for illegal waste management, resulting in significant fines. Additionally, the EPD enforces waste shipment controls in collaboration with the Customs and Excise Department, conducting joint inspections based on risk assessments. In the last five years, they inspected over 1,800 shipments and intercepted more than 200 illegal waste shipments, which were returned to the state of export for proper handling.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

China has ratified the Basel Convention. HKSAR confirmed that the ratification is also applicable to the HKSAR. China complies with the reporting obligations of the Basel Convention, and HKSAR provides all required information to the Central People's Government for the incorporation in China's National Report. No issues were observed regarding compliance with other obligations under the Convention.

The application of HKSAR further indicated that China has ratified eleven multilateral agreements out of thirteen, and that HKSAR regularly submits all relevant information to be included in the reports. The application of HKSAR also provides relevant information on how it complies with all other obligations set out in these agreements.

The two agreements that are not ratified are the Equal Remuneration Convention, 1951 (No. 100) and the Discrimination (Employment and Occupation) Convention, 1958 (No. 111). However, the application of HKSAR explained that it places great emphasis on the promotion of equal opportunity for workers and is eliminating all forms of discrimination in employment; moreover, in line with the objectives of these two ILO Conventions, HKSAR is reviewing its labour legislation and policies to improve employment standards. HKSAR implemented several pieces of legislation to comply with the obligations of these two agreements, such as the Sex Discrimination Ordinance (SDO), the Disability Discrimination Ordinance (DDO), and the Race Discrimination Ordinance (RDO) ⁽¹³⁾.

VII.2 HKSAR: conclusions

HKSAR submitted an application to import ferrous and non-ferrous metal waste.

Although HKSAR has an acceptable domestic legal framework for environmental protection, waste management and waste shipment, the application did not demonstrate that all key pollutants for the treatment of metal waste will be controlled, notably total organic carbon (TOC), chemical oxygen demand (COD), and total volatile organic compounds (TVOC). It was thus not demonstrated that the facility will use all BATs. Moreover, the facility which should receive the metal waste is not yet operational and has not yet received a permit. Considering the high hazard profile of metals and metallurgical treatment, the Commission is not yet able to conclude that metal waste will be managed in an environmentally sound manner in HKSAR.

As a result of the assessment above, HKSAR could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised.

⁽¹³⁾ Equal Opportunities Commission: [Home - Equal Opportunities Commission](#)

Annex VIII: India

India submitted its application on 17 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited India to provide additional information. India provided such information on 21 November 2025. Following a second request for additional information from the Commission, India shared additional information on 13 January 2026.

The application of India referred to several waste codes that concern hazardous waste. Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes concerned (A-list of Annex VIII of the Basel Convention, as well as mentioned OECD codes for various hazardous wastes) are therefore not eligible for the inclusion in the list of countries which could be authorised to export waste to the EU (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes were therefore not considered when assessing the application of India.

The application of India also referred to electrical and electronic waste that could be classified under the codes B1110, GC010, GC020. These codes are no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application of India further referred to household waste that could be classified under the codes Y46 or Y47. According to Article 39(1) point (c) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application of India furthermore referred to non-hazardous plastic waste classified under codes Y48, B3010 and B3011. According to Article 39(1) points (c) and (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of India.

The application submitted by India covered 14 groups of waste types, eligible under Title IV of the WSR:

- Ferrous metal waste: B1010, B1040, B1200, B1250, B1210, B1220, B1230, B2090;
- Non-ferrous metal waste: B1010, B1040, B1250, B1020, B130, B1031, B1050, B1060, B1070, B1080, B1100, B1115, B1120, B1130, B1140, B1150, B1160, B1170, B1180, B1190, B1240, B2110, GB040 (Slags from precious metals and copper processing for further refining, corresponding to B1100 and B1070), GC050 (Spent fluid catalytic cracking – FCC – catalysts, such as aluminium oxide, zeolites, corresponding to B1120);
- Waste batteries: B1090;
- Paper waste: B3020; B3027, and BEU04 (Composite packaging consisting of mainly paper and some plastic, not containing residues);
- Wood waste: B3050;
- Rubber waste: B3040, B3080, B3140 (waste pneumatic tyres);

- Textile waste: B3030, B3035, B3090, B3100, B3110;
- Organic and agro-food waste: B3060, B3065, B3070, B3130, GN010 (Waste of pigs', hogs' or boars' bristles and hair or of badger hair and other brush making hair), GN020 (Horsehair waste, whether or not put up as a layer with or without supporting material), GN030 (Waste of skins and other parts of birds, with their feathers or down, of feathers and parts of feathers – whether or not with trimmed edges – and down, not further worked than cleaned, disinfected or treated for preservation) (GN010, GN020 and GN030 correspond to B3060);
- Mineral waste: B2010, B2040, B2050, B2060, B2070, B2080, B2100, B2130; GG030 (Bottom ash and slag tap from coal fired power plants), GG040 (Coal fired power plants fly ash, corresponding to B2050);
- Acidic waste: B2120;
- Glass waste: B2020, GE020 (Glass fibre waste, corresponding to B2020);
- Ceramic waste: B2030, GF010 (Ceramic wastes which have been fired after shaping, including ceramic vessels, corresponding to B2030);
- Paint, dyes, inks: B3120, B4010, B4020;
- Vessels and floating structures: GC030 (Vessels and other floating structures for breaking up, properly emptied of any cargo and other materials arising from the operation of the vessel which may have been classified as a dangerous substance or waste).

VIII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application contained satisfactory information regarding waste generation and waste treatment capacities in the country. India's application provided the total annual quantity of waste generated and explained how these quantities are projected to evolve over the next ten years. It also provided a detailed explanation for the calculation of this data. The application further provided an estimate of the country's current treatment capacity for waste in general (covering the amount of waste generated domestically), and a description of how that capacity is estimated. However, the application did not provide information on how the total treatment capacity is estimated to evolve over the next decade.

The application of India contained some information regarding separate collection and recycling of domestic waste. It did not supply the overall proportion of domestically generated waste that is separately collected, nor the proportion separately collected for each major waste stream. The application did not sufficiently address the objectives or measures aimed at increasing the rate of separately collected waste, reducing the rate of landfilled waste and increasing the rate of recycled waste in the future.

More information should be gathered on the quantity of waste that is littered.

India's application provided the quantity of imported waste for each of the eligible waste types concerned by the request and offered information on its strategy to ensure the environmentally sound management of imported waste, including how such imports will not negatively affect the management of domestically generated waste. The import of

waste is permitted only for recycling, recovery, or utilization in authorised facilities. More specific assessments per waste type are provided in section VIII.2 below.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

India provided a comprehensive explanation of its permitting, licensing, and registration systems for waste transport. The regulatory framework mandates registration with the competent authority, ensuring establishments involved in waste management are monitored.

India's application provided general information on the legal framework addressing the prevention and control of air and water pollution through legally enforceable standards. India applies a standards-and-consent regime under which emission and effluent limits, together with monitoring obligations, are imposed at facility level by competent authorities. Air pollution control is regulated under the Air (Prevention and Control of Pollution) Act, 1981, which requires facilities to obtain Consent to Establish and Consent to Operate from State Pollution Control Boards or Pollution Control Committees, specifying source-specific emission limits. Water pollution prevention is governed by the Water (Prevention and Control of Pollution) Act, 1974, complemented by sector-specific effluent standards notified under the Environment (Protection) Act, 1986. Information on legislation regarding soil protection was however not provided.

The application provided sufficient information regarding domestic legislation on the import and export of waste. India explained in its application that it implements the rules on import and export of waste through the Management and Transboundary Movement Rules, 2016, under which hazardous wastes listed as Part A are subject to the PIC procedure, certain non-hazardous wastes under Part B require prior permission from the Ministry of Environment, Forest and Climate Change and a license from the Directorate General of Foreign Trade, and non-hazardous wastes under Part D are exempt from PIC and government permissions. India also described the functioning of the PIC procedure itself, detailing the steps of Notification, Consent, Transboundary movement, and Confirmation of treatment.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

India provided satisfactory information regarding its strategy for the enforcement of domestic legislation on waste management and waste shipment. It explained that bodies are in place to plan and conduct inspections, undertake surprise checks, review records, take samples, and verify compliance with consent and authorisation conditions – covering inspection planning, facility inspections and general spot check powers. India's application also stated that enforcement in practice is carried out through regular and priority-based inspections, including document checks and sampling, and that penalties may be levied, escalated, and ultimately lead to fines or imprisonment. The application referred to the establishment of periodic monitoring frequencies set by the competent authority, a structured system of environmental inspections, the possibility of non-routine inspections in cases of non-compliance, prohibitions and penalties for littering and illegal dumping, periodic inspections of waste management operators, continuous monitoring of emissions

for compliance verification, and measures to address incidents or accidents with environmental or health impacts. However, India did not provide sufficiently quantified evidence, such as statistics, cases, or examples, to fully demonstrate the implementation of inspections, shipment checks, recovery operation checks, or penalties.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

India has ratified the Basel Convention and provided evidence that the country complies with the reporting obligations of the Basel Convention.

India has ratified 11 other multilateral agreements but has not ratified the Freedom of Association and Protection of the Right to Organize Convention and the Right to Organize and Collective Bargaining Action Convention. India stated that there are nonetheless national legislations covering different aspects of these conventions, such as Trade Unions Act, Industrial Disputes Act, and others; however, no information on the content of these acts was provided.

Concerning the 11 ratified multilateral agreements, India's application provided explanations of how they have been integrated into domestic legislation and government's actions and indicated that national reports are regularly submitted.

No other issues with compliance were observed.

VIII.2 Waste-stream specific assessments

Ferrous and non-ferrous metal waste

Concerning ferrous and non-ferrous metal waste, India's description of the national waste strategy is acceptable. India provided an estimate of the annual quantity of waste generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity for these types of waste, which confirmed that the treatment capacity is higher than the amount of waste generated, and the proportion of domestic waste concerned by the request that is recycled. However, the application does not provide a 10 years projection of the country's treatment capacity for such waste, and the proportion of domestic waste concerned by the request that is landfilled. In fact, on the latter India stated that no data was available. Concerning mineral waste and acidic waste, the application did not provide sufficient information.

India's application demonstrated that it has an established permitting framework. The regulatory framework addresses permit renewal requirements, authorisation conditions for waste treatment facilities, authorisation for treatment activities, permit content relating to emissions and environmental protection, and obligations for definitive closure and post-closure care. However, the information did not demonstrate landfill-specific permitting requirements, notably conditions governing permit issuance such as site suitability, technical competence of operators, financial security for closure and after-care, or mandatory pre-operational inspections.

The application provided information to showcase that residual waste generated through the recovery operations is managed in an environmentally sound manner, including general permit content requirements, preventive measures against pollution and accidents, landfill closure and after-care responsibilities, and the use of accredited laboratories for periodic waste testing. However, the application did not contain information on landfill waste acceptance criteria, basic waste characterisation, or systematic testing of waste composition and leaching prior to disposal. There is no information on requirements for landfill operators to verify or document incoming waste, nor any provisions on operational monitoring during landfill activities. In addition, the information did not address bans on landfilling separately collected waste for reuse or recycling, prohibitions on dilution or mixing of waste to meet admissibility criteria, or limit values for co-disposal of non-hazardous and hazardous waste.

Also, India's application insufficiently demonstrated that pollution controls apply to treatment operations of ferrous and non-ferrous metal waste, mineral waste and acidic waste. There is no comprehensive regulatory coverage of air emissions reduction for heavy metals, dust, dioxins and furans and PCBs, nor detailed requirements for wastewater treatment stages based on best available techniques. The regulatory framework lacks key provisions covering energy efficiency, including requirements for a stable shredder feed, energy efficiency plans, and energy balance records. Finally, not all key pollutants related to ferrous and non-ferrous metal waste, mineral waste or ashes management are mentioned.

Waste batteries

Concerning waste batteries and catalysts, India's description of the national waste strategy is acceptable, and it demonstrated that it has an established permitting framework, based on information of a similar degree of detail as was provided for ferrous and non-ferrous metal.

India's application made insufficiently clear that measures are in place to ensure residual waste generated by treating the batteries and catalysts is managed in an environmentally sound manner. The information provided addresses certain general elements, including preventive operational measures, permit content requirements, landfill closure and after-care obligations, and the use of accredited laboratories for periodic waste testing. However, the framework does not establish landfill waste acceptance criteria, basic waste characterisation, or systematic testing of waste composition and leaching prior to disposal. There are no requirements for landfill operators to verify, record, or reject non-compliant waste, nor provisions for operational monitoring during landfill activities. In addition, the information does not address bans on landfilling separately collected waste intended for reuse or recycling, prohibitions on dilution or mixing of waste to meet admissibility criteria, or limit values for co-disposal of non-hazardous and hazardous waste. Finally, no clear rules are presented on the disposal or recovery pathways for spent batteries, resulting in significant gaps in environmental control.

Also regarding pollution controls for treatment of battery and catalysts waste, India's application is insufficiently demonstrating equivalence. The information provided refers to certain practices supporting material recovery, measures promoting wastewater reuse and recycling, and general requirements to reduce environmental risks from waste storage, handling, and transfer through authorisation procedures. However, significant gaps remain.

There are no provisions addressing the removal of batteries from waste appliances, nor any systematic requirements on energy efficiency, including stable shredder feed conditions, energy efficiency plans, or energy balance records. The legal framework does not establish measures to reduce air emissions of dust, metals, dioxins and furans, or PCBs, nor to prevent diffuse emissions during scrap pre-treatment. In addition, wastewater treatment requirements are not clearly defined and no controls are presented for emissions of HCl, chlorine, or HF from thermal treatment.

Paper waste

Concerning paper waste, India's description of the national waste strategy demonstrated that it has an established permitting framework. India provided an estimate of the annual quantity of waste generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years. It provided an estimate of the country's treatment capacity, and it provided the proportion of domestic waste concerned by the request that is recycled. However, the application does not provide a 10-year projection of the country's treatment capacity for such waste, and the proportion of domestic waste concerned by the request that is landfilled. In fact, on the latter India stated that no data was available.

India's application demonstrated that it has an established permitting framework. The regulatory framework addresses permit renewal requirements, authorisation conditions for waste treatment facilities, authorisation for treatment activities, permit content relating to emissions and environmental protection, and obligations for definitive closure and post-closure care. However, the information did not fully demonstrate landfill-specific permitting requirements, notably conditions governing permit issuance such as site suitability, technical competence of operators, financial security for closure and after-care, or mandatory pre-operational inspections.

India's application did not fully demonstrate what measures are in place to ensure that residual waste generated by treating the paper waste is managed in an environmentally sound manner. The information provided covers preventive operational measures, permit conditions related to emissions and environmental protection, responsibilities for landfill closure and after-care, annual monitoring by accredited laboratories, and references to the reuse of incineration residues. However, more information is to be gathered on landfill waste acceptance criteria, basic waste characterisation, or mandatory testing of waste composition and leaching prior to disposal, as well as on requirements for landfill operators to verify, record, or reject non-compliant waste, nor are there provisions for operational monitoring during landfill activities. The application did not address bans on landfilling separately collected waste, prohibitions on dilution or mixing to meet admissibility criteria, limits for co-disposal of hazardous and non-hazardous waste, or substance control and dust emission reduction in kiln operations. Moreover, not all relevant pollutants are consistently addressed.

India's application overall described its national pollution control strategy for the treatment of paper waste. The application addressed a number of general aspects for paper waste management, including the reuse of treated wastewater, authorisation requirements for waste storage, handling and transfer, basic measures to reduce freshwater use and wastewater flows, and general responsibilities in case of breakdowns. However, the

provided framework does not fully address energy efficiency, reduction of thermal and electrical energy consumption, or minimisation and recycling of solid waste. More information is needed to fully demonstrate requirements for controlling air emissions, including dust, metals, dioxins and furans and PCBs, or VOCs, nor detailed provisions on wastewater treatment stages using best available techniques. Additional information is required on measures for controlling emissions and waste quality in kiln operations, managing dust from non-kiln activities, or preventing environmental impacts from water reuse. Finally, several relevant pollutants were not consistently addressed.

Wood waste

Concerning wood waste, India's description of the national waste strategy demonstrated that it has an established permitting framework for the management of wood waste based on information of a similar degree of detail as was provided for the above-mentioned waste streams.

However, more information should be provided to make an estimate of the annual quantity of waste generated in the country, as well as information on how these quantities will develop in the next 10 years, and an estimate of the country's wood waste treatment capacity, a 10-year projection of the country's treatment capacity, the proportion of domestic wood waste that is landfilled, and the proportion of domestic wood waste that is recycled.

More information should be gathered to fully demonstrate what measures are in place to ensure residual waste generated by treating the wood waste is managed in an environmentally sound manner. The information provided covers general preventive operational measures, basic permit content elements, landfill closure and post-closure responsibilities, and the use of accredited third-party laboratories for periodic waste testing. However, the application did not fully demonstrate landfill waste acceptance criteria, requirements for basic waste characterisation or systematic testing of composition and leaching prior to disposal, and obligations for landfill operators to verify, record, or reject non-compliant waste. The framework does not address operational monitoring of landfills, bans on landfilling separately collected waste intended for reuse or recycling, or prohibitions on dilution or mixing of waste to meet admissibility criteria. Additional information is required on the technical provisions on emissions control from combustion or kiln-related activities, substance control and treatment of waste used in kilns, and on key pollutants for the treatment of wood waste residues.

India's application overall described its national pollution control strategy for treatment of wood waste. The framework provided mentions measures on water reuse and recycling through standard operating procedures, and to authorisation requirements aimed at reducing environmental risks during waste storage, handling, and transfer. However, additional information is required on the technical provisions for biomass waste combustion plants, energy efficiency planning, the management of malfunctions or breakdowns of abatement equipment. The framework does not fully address the reduction of air emissions of dust, metals, dioxins and furans and PCBs, nor does it set out detailed requirements for wastewater treatment stages. In addition, more information is needed to fully demonstrate the rules on substance control in kilns, appropriate treatment of waste

used in kilns, or the reduction of dust emissions from kiln and other dusty operations. Finally, not all key pollutants related to the management of wood waste were mentioned.

Rubber waste

Concerning rubber waste, India's description of the national waste strategy demonstrated that it has an established permitting framework, based on information of a similar degree of detail as was provided for paper waste.

More information should be gathered to fully demonstrate what measures are in place to ensure residual waste generated by treating the rubber waste is managed in an environmentally sound manner. The information provided covers preventive operational measures, permit conditions related to emissions and environmental protection, responsibilities for landfill closure and after-care, annual monitoring by accredited laboratories, and references to the reuse of incineration residues. However, more information is needed on landfill waste acceptance criteria, basic waste characterisation, or mandatory testing of waste composition and leaching prior to disposal. The application did not fully demonstrate the requirements for landfill operators to verify, record, or reject non-compliant waste, nor are there provisions for operational monitoring during landfill activities. In addition, more information on how the country addresses bans on landfilling separately collected waste, prohibitions on dilution or mixing to meet admissibility criteria, limits for co-disposal of hazardous and non-hazardous waste, or substance control and dust emission reduction in kiln operations is needed. Moreover, not all relevant pollutants are consistently addressed.

India's application overall described its national pollution control strategy for treatment of rubber waste. The framework provides information on water reuse and recycling through standard operating procedures, authorisation requirements to reduce environmental risks during waste storage, handling and transfer, and broad references to environmentally sound closure and post-closure responsibilities. However, the provided framework does not fully address energy efficiency planning or energy balance recording, reduction of air emissions of dust, metals, dioxins, or PCBs, nor detailed requirements for wastewater treatment stages. Additional information is required on substance control in kilns, on ensuring the suitability of waste used in kilns, or on reducing dust emissions from kiln and other dusty operations. Finally, not all key pollutants related to the management of rubber waste are addressed.

Textile waste

Concerning textile waste, India's description of the national waste strategy is acceptable. It provided all the request information, except a 10-year projection of the country's treatment capacity for textile waste.

The application shows that India has an established permitting framework for the management of textile waste, based on information of a similar degree of detail as was provided for paper waste.

The application did not fully demonstrate what measures are in place to ensure residual waste generated by treating the textile waste is managed in an environmentally sound manner, for reasons similar to those mentioned in the section on rubber waste.

For similar reasons as for rubber waste, additional information is needed regarding pollution controls for treatment of textile waste.

Organic and agro-food waste

Concerning organic and agro-food waste, and other organic waste, the description of the national waste strategy demonstrated that India has an established permitting framework for the management of such waste based on information of a similar degree of detail as was provided for paper waste. However, it did not provide the same data as mentioned under wood waste. Concerning animal-derived or biogenic textile, the application did not provide a 10-year projection of the country's treatment capacity for such waste.

The application did not fully demonstrate what measures are in place to ensure residual waste generated by treating the waste is managed in an environmentally sound manner. The information provided includes preventive measures, permit content requirements, landfill closure and after-care obligations, and the use of accredited laboratories for annual waste testing. It also references the reuse of residues from incineration or co-incineration. However, no specific technical regulations concerning organic waste are provided. In particular, more information is needed on requirements for biomass waste combustion plants, landfill waste acceptance criteria, basic waste characterisation, or systematic testing for composition and leaching. Landfill operators' obligation to inspect, record, or reject non-compliant waste is not fully addressed, nor is operational monitoring. Additionally, more information should be provided on how the country addresses bans on landfilling separately collected waste, limits on co-disposal, and rules on kiln emissions or waste suitability. Finally, not all key pollutants related to the treatment of residues coming from organic waste are mentioned.

India's application overall described its national pollution control strategy for treatment of organic waste and animal-derived or biogenic textile waste. The information provided addresses certain measures such as reuse and recycling of treated wastewater and authorisation requirements for waste storage and transfer facilities. However, the overview of the provided framework does not fully cover technical regulations for biomass waste combustion, malfunction of abatement equipment, energy efficiency, reduction of emissions from dust, metals, dioxins and furans, or PCBs, nor control of odours and diffuse emissions. Additional information is required on the monitoring of waste and process parameters, segregation or recirculation of waste gases, digester operation, or specific wastewater treatment steps. Finally, not all key pollutants the management of these waste streams are mentioned.

Glass waste and ceramics waste

Concerning glass waste, India's description of the national waste strategy is acceptable. Concerning ceramics waste, the application requires complementary data as for wood waste. Regarding both waste streams, it demonstrated that an established permitting

framework is in place, based on information of a similar degree of detail as was provided for paper waste.

India's application did not fully demonstrate what measures are in place to ensure residual waste generated by treating the glass waste and ceramics waste is managed in an environmentally sound manner. The information provided covers certain elements on the treatment of glass residues, including general permit content requirements, preventive measures against pollution and accidents, landfill closure and after-care responsibilities, and the use of accredited laboratories for periodic waste testing. However, more information should be gathered to elaborate on landfill waste acceptance criteria, basic waste characterisation, or systematic testing of waste composition and leaching prior to disposal, as well as on requirements for landfill operators to verify or document incoming waste, nor any provisions on operational monitoring during landfill activities. In addition, more information should be gathered on how the country addresses bans on landfilling separately collected waste for reuse or recycling, prohibitions on dilution or mixing of waste to meet admissibility criteria, or limit values for inert waste or co-disposal of non-hazardous and hazardous waste.

India's response regarding pollution controls for treatment of glass waste is not fully adequate, as additional information is needed concerning the treatment of glass waste and on technical regulations to reduce emissions of dust, metals, dioxins and furans, or PCBs from glass melting, nor measures for filtration or selection of low-metal raw materials. More evidence should be provided on the policy framework for controlling input materials in glass production or for systematically limiting metal emissions from the furnace. Overall, not all key pollutants were addressed.

More information on pollution controls for treatment of ceramics waste is needed. The application did not fully address technical regulations to reduce emissions of dust, metals, dioxins and furans, or PCBs from ceramics manufacturing.

Paints, dyes, and inks

Concerning paints, dyes, and inks waste, India's description of the national waste strategy is acceptable, and it demonstrated that it has an established permitting framework, based on information of a similar degree of detail as was provided for paper waste.

India's application did not fully demonstrate what measures are in place to ensure residual waste generated by treating the paints, dyes, and inks waste is managed in an environmentally sound manner. The information provided covers preventive operational measures, permit content requirements, landfill closure and after-care obligations, annual monitoring by accredited laboratories, breakdown prevention, and the reuse of residues from incineration and co-incineration plants. However, more information is needed to elaborate on landfill waste acceptance criteria, basic characterisation of waste, or systematic testing for composition and leaching, as well as on requirements for landfill operators to inspect, record, or reject non-compliant waste, nor for operational monitoring during landfill activities. More information should be gathered on how the country addresses bans on landfilling separately collected waste, restrictions on dilution or mixing, limit values for co-disposal, or dust and kiln emission controls are also missing. Finally, not all key pollutants are addressed.

India's application overall described its national pollution control strategy for treatment of this waste. The information provided covers the reuse and recycling of treated wastewater, authorisation requirements for waste storage and transfer facilities, and responsibilities for environmentally sound closure and post-closure operations. However, more information on what technical regulations are included in the legal framework for energy efficiency, reduction of dust, metals, dioxins and furans, PCBs, or organic compound emissions, nor measures to control odours or diffuse emissions from open-air treatment (for organic paints). Additional information is required on the monitoring of process parameters, digester operation, or wastewater treatment steps, and on regulations for controlling dust or substances in kiln operations. Moreover, not all key pollutants are addressed.

Specifically concerning composite packaging consisting of mainly paper and plastic, not containing residues (BEU04), the following was considered: the management of plastic waste faces serious environmental and human health challenges, notably in countries to which the OECD Decision does not apply, where standards and infrastructure for the management of plastic waste are, in most cases, not as developed as in the EU.

It is important to note that entry BEU04 is in fact a code for the purpose of shipment between EU Member States only, that waste covered by this entry largely constitutes plastic waste and that the EU has prohibited the export of plastic waste to non-OECD countries.

In light of the above, the export of waste covered by entry BEU04 is not considered appropriate in respect of the EU's policy to not export its waste challenges, notably related to plastic waste.

Specifically concerning waste from pre-treatment of composite packaging (B3026)

The following non-hazardous waste from the pre-treatment of composite packaging for liquids, is considered under entry B3026:

- Non-separable plastic fraction
- Non-separable plastic-aluminium fraction

The management of plastic waste faces serious environmental and human health challenges, notably in countries to which the OECD Decision does not apply, where standards and infrastructure for the management of plastic waste are, in most cases, not as developed as in the EU.

It is important to note that the EU has prohibited the export of plastic waste to non-OECD countries, whereas waste covered by entry B3026 is in fact plastic waste.

In light of the above, the export of the waste covered by entry B3026 is not considered appropriate in respect of the EU's policy to not export its waste challenges, notably related to plastic waste.

Vessels and floating structures

It is important to note that Regulation (EU) 2024/1157 on shipment of waste¹⁴ clarified that a ship falling within the scope of Regulation (EU) No 1257/2013 that becomes a waste in an area under the national jurisdiction of a Member State cannot be exported from the Union to countries that are not listed in Annex VII to the Basel Convention (i.e. to non-OECD countries). This is on the basis that, when becoming waste, ships are generally classified as hazardous waste, except when all hazardous substances and materials have been removed from them. Consequently, these vessels can only be recycled in facilities included in the European List of ship recycling facilities that are located in OECD countries.

In addition, the description of the national waste strategy in India's application is insufficient. In particular, the application provided the proportion of domestic waste concerned by the request that is recycled. However, it falls short in providing an estimate of the annual quantity of waste generated in the country, as well as information on how these quantities will develop in the next 10 years, and an estimate of the country's treatment capacity for the waste concerned by the request, 10 years projection of the country's treatment capacity for such waste, and the proportion of domestic waste concerned by the request that is landfilled.

VIII.3 India: conclusions

India submitted an application to import ferrous and non-ferrous metal waste, waste batteries, paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, paint, dyes and inks, and vessels and floating structures.

As a result of this assessment, India

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, paint, dyes and inks.
- **cannot be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste, composite packaging consisting of mainly paper and plastic, not containing residues (BEU04), waste from pre-treatment of composite packaging (B3026), and vessels and floating structures.

In addition, the Commission services emphasise the need for the authorities from India to further demonstrate, in particular, which measures are being taken under its national waste management framework, especially regarding separate collection and recycling of domestic waste, as well as any measure aimed at reducing the rate of landfilled waste in the future. Furthermore, pollution control and emission management policies should be further detailed and information on broader environmental legislation addressing soil should be provided. In addition, enforcement information should be substantiated with

¹⁴ OJ L, 2024/1157, 30.4.2024,

concrete evidence and statistics and data on permits and waste type treated made available at facility level.

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Annex IX: Indonesia

Indonesia submitted its application on 10 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Indonesia to provide additional information. Indonesia provided such information on 15 September 2025. Following a second request for additional information from the Commission, Indonesia shared additional information on 9 January 2026.

The application submitted by Indonesia covers three types of waste, eligible under Title IV of the WSR:

- Ferrous and non-ferrous metal waste (B1010)
- Paper waste (B3020)

IX.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Indonesia provided satisfactory information on its national waste management strategy and plan.

Indonesia provided the annual quantity of total waste generated in the country (i.e. 56,6 million tons in 2023) as well as the annual quantity of paper waste. Indonesia also provided estimations over the next 10 years of reporting, until 2033. In addition, Indonesia explained that the amount of waste generated is calculated by multiplying the population by the average per capita waste generation.

Indonesia provided an estimate of the country's current treatment capacity for waste in general, and an estimate for the two waste types concerned by the request. It also indicated the total generation for metal and paper (6.7 million tons) and the treatment capacity, which is at 6.8 million tonnes for metals in 2024 and at 15.5 million tonnes for paper in 2024. However, the underlying methodology to collect and verify data was not provided.

Indonesia provided information on the most important types of domestic waste that are being generated, but not the proportion of the waste separately collected in general. It also provided information on objectives and measures to improve separate collection.

Indonesia provided the annual tonnages of paper waste generated, recycled, and landfilled for several years. In 2023, 2.647.049,15 tons of paper waste were landfilled while Indonesia specifies that no metal waste is sent to landfill. In addition, Indonesia mentioned the Zero Waste Zero Emission 2040 roadmap, but the information is not sufficiently detailed regarding specific, actionable measures or quantified targets for reducing paper waste landfilling.

Indonesia provided information on the quantity of waste that is littered as well as information on objectives and measures. Indonesia describes objectives and measures to

prevent and clean up litter, such as education, awareness campaigns, policy support, and infrastructure improvements. However, the methodology for calculating the amount littered is not provided.

Finally, Indonesia provided information on the quantity of imported waste, from the EU and from non-EU countries.

Indonesia's strategy shows that imported waste is managed under strict environmental controls - such as 2% impurity limits, port-of-origin inspections, and mandatory treatment of residues by importers - ensuring only clean, recyclable materials enter the country and preventing any burden on domestic waste systems. It also outlines safeguards and licensed facilities for hazardous residues, reflecting standards comparable to those in the EU.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Indonesia's application is acceptable regarding the permitting, licensing or registration system for the transport of waste. Regarding registration of waste carriers, any establishment intending to carry out waste management activities, including transportation, must be registered and obtain a permit from the competent authority. Regarding the register of establishments carrying/transporting waste, Indonesia indicated in its application that authorities require registration and reporting, but it does not provide a maintained and accessible register of establishments carrying/transporting waste. A point of attention remains for Indonesia is to work on the harmonisation of waste management infrastructure and waste transportation.

Indonesia's application provided evidence of domestic legislation to protect air, water and soil quality. The application included information on air-related requirements for emission monitoring and reporting, reference to national ambient air quality standards and emission thresholds for pollutants such as SO₂, NO_x, dust, and persistent organic pollutants, and mention of regulations for industrial emission quality standards and continuous monitoring. Regarding water pollution, Indonesia referenced wastewater treatment requirements (primary, secondary, and advanced treatment), monitoring and reporting of water quality, including parameters such as metals and organic pollutants, and referenced national water quality standards and effluent limits. Regarding soil pollution, Indonesia's application refers to requirements for safe storage and handling of waste to prevent soil contamination, obligations for remediation and restoration in case of pollution, and enforcement of the polluter-pays principle and liability for environmental damage.

Indonesia's application provided evidence of a comprehensive import-control system for paper/paperboard and metal scrap that functions as an equivalent to PIC-type procedures or requirements under Article 18 of the WSR ("general information procedure"). Importers must obtain an Import Permit through the National Single Window and submit detailed documentation, including a Registered Exporter certificate, exporter's declaration on waste characteristics, and technical recommendations from the Ministry of Environment and Ministry of Industry. Pre-export verification (VPTI) by accredited surveyors is mandatory at the port of origin to confirm regulatory compliance and impurity limits, and non-compliant shipments must be re-exported or destroyed with sanctions available for importers. The legislation requires traceability, licensed facilities, and importer responsibility for managing impurities and residues. The system covers notification, consent, movement control and post-import obligations, providing an equivalent.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Indonesia's application provided useful information on the strategy for enforcement of domestic legislation on waste management and waste shipment. The legislation requires inspection planning, regular and non-routine inspections of facilities, spot checks on shipments and recovery, and document/identity/physical checks. The enforcement strategy includes border supervision, technical verification, and sampling methods for waste shipments.

In addition, Indonesia's application provided details on the number and nature of inspections, including border checks, technical verification, and sampling methods. Inspections are carried out by customs and other authorities, with periodic and incident-based inspections described. Indonesia's legislation lays out administrative and criminal penalties for infringements, including fines, suspension, revocation of permits, and other sanctions. Penalties are described as effective, proportionate, and dissuasive. Moreover, Indonesia described the application of penalties, including examples of sanctions imposed (revocation, suspension, re-export, destruction of non-compliant goods). However, it does not provide detailed statistics or specific numbers/sizes of penalties imposed.

Indonesia's application indicated a comprehensive approach to environmental inspections for waste management installations, including both routine and non-routine checks to ensure compliance and remedial action when necessary. The country's legal framework prohibits littering and waste dumping, with penalties in place for violations. Enforcement is supported by regular inspections of waste management, collection, and transport activities, with authorities monitoring the origin, nature, quantity, and destination of waste. Operators are obliged to respond appropriately to incidents or accidents, and there are requirements for both periodic and real-time emissions monitoring. Penalties for non-compliance are structured to be effective and dissuasive, and where breaches occur, measures are mandated to restore compliance, including the possible suspension of operations in cases of imminent danger to health or the environment. The application described periodic monitoring and reporting obligations but does not explicitly state that the frequency is determined by the competent authority in a permit for each installation or in general binding rules.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Indonesia has ratified the Basel Convention and the other 13 relevant multilateral agreements. No compliance or reporting obligations can be observed.

Overall, Indonesia fulfils its relevant international commitments.

IX.2 Waste-stream specific assessments

Ferrous and non-ferrous metal waste

Concerning metal waste, Indonesia indicated in its application the proportion of the waste concerned by the request: recycled metal per year, i.e. 2,659,502 tons, equal to 96,4 % of the metal scrap generated. However, the country is falling short of providing the following information: 10 years projection of country's treatment capacity for ferrous waste, the methodology for calculating the proportion of domestic ferrous metal waste that is landfilled, and objectives and measures to increase the recycling rate of the waste.

Indonesia demonstrated equivalence with EU benchmarks regarding permitting for waste treatment facilities. However, Indonesia's application did not provide element ensuring that residual waste generated by treating ferrous metal waste is managed in an environmentally sound manner. Indonesia does not provide or only partially provides essential information regarding landfill waste acceptance criteria, landfill-specific operational procedures, and monitoring requirements. The application lacks clear national landfill acceptance lists, a structured characterisation hierarchy, explicit rules for acceptance, and documentation protocols. Landfill closure and after-care provisions are only partially addressed, without detailed landfill-specific conditions or environmental protection monitoring.

The application insufficiently demonstrated equivalent pollution controls applying to metal waste treatment operations. On the one hand, the application demonstrated compliance with key environmental safeguards in waste treatment by implementing advanced treatment technologies, enforcing emission standards for pollutants, requiring staged wastewater treatment, and ensuring secure, licensed hazardous waste storage with thorough documentation. In addition, Indonesia's application mentioned that important substances, such as heavy metals, dust, dioxins and furans, NO_x, sulphur dioxide, are controlled. However, the application lacked or only partially provided critical operational and environmental protocols, such as requirements for stable shredder feed, mandated energy efficiency plans, water-saving strategies, and comprehensive water management. There are also omissions in procedures for waste handling and transfer, quality control of scrap, prevention of dust emissions, landfill acceptance criteria, landfill-specific operations, and the use of independent laboratories for waste testing. Furthermore, the framework is missing robust measures for optimising energy and water use, enforcing strict quality controls for recyclables, and protocols to minimise environmental risks.

Paper waste

Concerning paper waste, the application provided an acceptable level of information on its national waste management strategy and plan. It provides the proportion of the paper waste that is recycled as well as information on objectives and measures to increase the recycling rate. 10 year projections of the country's treatment capacity were not provided and also no detailed explanations are given on proportion of domestic paper waste that is recycled.

Indonesia's application demonstrated equivalence with EU benchmarks regarding permitting for waste treatment facilities. It provides sufficiently detailed information on permitting, licensing or registration systems for waste treatment facilities.

The application provided information on how residual waste generated by treating the paper waste is managed and could be assessed environmentally sound. A point of attention remains that only partial information was provided regarding landfill waste acceptance criteria, landfill-specific operational procedures, and monitoring requirements. Landfill closure and after-care provisions are only partially addressed, without detailed landfill-

specific conditions or environmental protection monitoring. In addition, Indonesia mentions that important substances, such as heavy metals, dust, dioxins and furans, NO_x, sulphur dioxide, are controlled.

Sufficient information is lacking to fully demonstrate equivalence regarding pollution controls applying to paper waste treatment operations. Indonesia mandates the use of best available techniques (BAT), such as fabric filters and wet scrubbers, to reduce air emissions of dust, heavy metals, and dioxins/furans, and requires staged wastewater treatment processes. A point of attention remains with Indonesia's regulatory framework for environmental and operational controls lacking key requirements for effective risk management in industrial activities. There are no clear mandates for energy efficiency, comprehensive water management, safe waste handling, or detailed air emission controls. The framework also does not specify robust quality assurance for materials or maintenance protocols for pollution control systems. In addition, the application mentions that important substances, such as heavy metals, dust, dioxins and furans, NO_x, sulphur dioxide, are controlled. However, the application does not provide emission limit values that should be monitored.

IX.3 Concerns raised by environmental non-governmental organisations

In December 2025, civil society organisations provided the European Commission with information expressing concerns regarding the impacts of imported waste to the domestic waste management system in Indonesia.

The concerns expressed cover:

- Imported paper waste management in East Java
- Challenges with residual plastic waste management, notably enforcing the contamination threshold laid down in Indonesian law.

The European Commission invited Indonesia to provide further additional information and clarifications on how the above-mentioned challenges are addressed in Indonesia. Indonesia provided a response on 29 January 2026.

In its response, the authorities in Indonesia indicated that companies importing recycled paper are required to ensure the proper management of residual impurities, either in-house, collective mechanisms, or through cooperation with duly licensed third-party waste management service providers.

The authorities indicated that a third-party service provider in East Java did not process the paper waste as envisaged and that now another company has been engaged that has adequate capacity to process the waste. The authorities furthermore provided a schematic overview of the impurity management process flow of the new company.

IX.4 Indonesia: conclusions

Indonesia submitted an application to import ferrous and non-ferrous metal waste as well as paper waste.

As a result of this assessment, Indonesia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste.
- **should not be included** for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Indonesia to further demonstrate, in particular, which measures are being taken to ensure sufficient treatment capacities for the stream included in the request, as well as pollution control, including emission limit values, applied during waste treatment. With regard to ferrous and non-ferrous metal, the assessment also points to the need for more information to confirm that the environmental sound management of these waste is ensured in the country.

Annex X: Kazakhstan

Kazakhstan submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Kazakhstan to provide additional information. Kazakhstan provided more information on 16 September 2025 and 11 January 2026.

The application of Kazakhstan referred to waste batteries under Basel entry B1090. Whereas this entry in principle covers non-hazardous waste batteries, the application explicitly refers to “lithium-ion batteries”. Such waste is classified under the European List of Waste with specific hazardous codes, notably *16 06 07** (waste lithium-based batteries) and *20 01 43** (separately collected municipal waste lithium-based batteries) due to fire and explosion risks.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, without any possible exemption. The wastes under the codes above are therefore not eligible for the inclusion in the list of countries which could be authorised to export waste to the EU (as described in Article 42 of the Waste Shipment Regulation (EU) 2024/1157). These wastes will therefore not be considered in the assessment of the application of Kazakhstan.

The application submitted by Kazakhstan covers two eligible types of waste, namely ferrous and non-ferrous metal waste: B1010 and B1120.

X.1 Generic assessment – waste type specific assessment

As Kazakhstan’s request concerns two eligible waste types for which the management can be assessed together, the assessment related to the overall situation of waste management in the country and of the criteria that are specific to the types of waste that the country wishes to import from the EU, are assessed together below.

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of Kazakhstan did not provide sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application of Kazakhstan provided data regarding the annual quantity of total waste generated in the country (an estimated 657 kilo tonnes in 2024). However, Kazakhstan did not explain how estimates for the figures that were provided, were made, and also did not provide quantities for each type of waste concerned by its request.

The application of Kazakhstan provided estimates of the available waste treatment capacity for the wastes concerned by the request, but not for its overall waste treatment capacity.

Also, it is not possible to assess whether the available waste treatment capacity suffices for the waste generated as no figures were provided per waste type concerned by the request.

The application of Kazakhstan did not provide data on the proportion of waste that is separately collected. It did provide information on measures to reduce the waste generation but it is unsure how this relates directly to increasing waste separation at source or separate collection of waste.

The application of Kazakhstan did not provide data on the waste that is landfilled or littered and did not explain why no such data can be provided.

The country provided the proportion of the municipal solid waste that is recycled (25,87%) of the generated waste, but did not provide the proportion of the waste concerned by the request that is recycled. No figures on the amounts recycled were provided and neither was it explained how the recycling rate was calculated or estimated.

Finally, the application of Kazakhstan supplied a table with the volume of hazardous waste "received" in Kazakh facilities, of which the quantities of imported hazardous waste are mentioned, (35,4 kilo tonnes in 2024). However, there is no mention of non-hazardous waste.

While there is mentioning in the application of a national strategy for waste management, no evidence is provided on the extent to which this strategy is put in place, and that the management of imported waste will not negatively impact the management of domestically generated waste.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Kazakhstan provided information on the legal framework in the country that requires waste transporters to be registered, but no evidence is provided that a register of waste transport companies is maintained.

Kazakhstan's permitting process for waste management facilities covers comprehensive environmental requirements, including the need for permits and licences for significant activities, periodic updates based on best available techniques, and the inclusion of specific standards and conditions for environmental protection and hazardous waste operations.

The application of Kazakhstan mentioned pieces of legislation in its application but did not provide details, especially on how they regulate air pollution, water pollution, and soil pollution. In addition, the information that Kazakhstan provided falls short in ensuring that residual waste generated by treating the waste concerned by the request is managed in an environmentally sound manner.

The information provided by Kazakh authorities lacked or only partially addressed requirements for energy efficiency and resource optimisation, including stable feed management, energy plans, and water use optimisation. The application did not provide adequate detail on advanced separation and recovery techniques for secondary materials, nor on specific emission reduction methods for air and wastewater, or the use of Best Available Techniques in treatment processes. Furthermore, there are insufficient provisions for environmental risk reduction during waste storage, handling, and transfer,

as well as measures to prevent diffuse emissions and control hazardous substances during various waste management operations. In addition, some substances (lead, cadmium, mercury, arsenic, nickel, chromium, oxides) have emission limits, but no units of quantification were specified, which makes comparison to the thresholds applied in the EU impossible.

In Kazakhstan, the import/export requires an authorisation, a license and a prior written notification and consent procedure, but no further detailed description was provided in the application. The Environmental Code stipulates that non-hazardous waste management operators should follow a notification procedure.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Kazakhstan indicated that inspections regarding environmental protection are carried out. If violations of the Environmental and Entrepreneurial Codes' requirements are identified, the operator receives an order to eliminate the violations and administrative proceedings are initiated. Penalties can be applied. More specifically, Kazakhstan's application informed on structured inspections, risk-based assessments, and both scheduled and unscheduled site visits to ensure compliance. The country's application described operator obligations for incident response and outlined a system of penalties and administrative actions, such as permit suspension or revocation, to address violations and enforce waste management regulations.

The names of two facilities are provided in the application along with their address, and the type of waste that they are planning to import. Neither the permit number nor the authorised treatment capacity is mentioned, but the application claims the facilities are duly permitted.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Kazakhstan has ratified the Basel Convention. The last report that Kazakhstan submitted was in 2024, for the year 2020 ⁽¹⁵⁾.

The country has not ratified the Minamata Convention and did not explain the reason for not ratifying.

Kazakhstan ratified all other relevant international agreements but did not provide evidence on whether and how it complies with its reporting and other obligations for these other multilateral agreements.

Kazakhstan did not comply with its reporting obligations in due time regarding the UNFCCC, as the country did not submit any biennial update report.

⁽¹⁵⁾ Basel Convention. 2024. Basel Convention National Reports – Year 2024 (January 2026). Access: <https://www.basel.int/Countries/NationalReporting/NationalReports/BC2024Reports/tabid/10394/Default.aspx>

X.2 Kazakhstan: conclusions

Kazakhstan submitted an application to import metal waste.

As a result of the assessment above, Kazakhstan could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

Annex XI: Lao PDR

Lao PDR submitted its application on 22 June 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Lao PDR to provide additional information on 11 July 2025, with a reminder sent on 5 December 2025. Lao PDR provided more information on 18 December 2025.

The application submitted by Lao PDR covers one specific type of waste, namely paper waste as covered under Basel entry B3020.

XI.1 Generic assessment - Waste-stream specific assessment

As Lao PDR's request concerns the import of paper waste to one specific facility, the assessment of the criteria related to the overall situation of waste management in the country and of the criteria that are specific to paper waste, are assessed together below.

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of Lao PDR indicated in its submission that data on segregated waste could not be provided due to the lack of waste separation systems and the limited amount of paper waste sent to recycling facilities in the country. Also, in its response to the Commission's request for additional clarification on this, the application of Lao PDR indicated that there is a lack of recorded data.

The application of Lao PDR provided an estimate of the total annual quantity of waste generated in the country, the annual quantity of waste generated for each type of waste concerned by the application, as well as how these figures are estimated to develop in the following 10 years.

Paper waste generation in Lao PDR is estimated at 30,000-40,000 tons per year. Approximately 94% is disposed of in landfills. According to the data provided by Lao PDR's request, the total quantity of paper waste imported into its territory is approximately 1,200,000 tonnes per year, of which imports originating from the European Union account for about 300,000-400,000 tonnes per year.

At the same time, Lao PDR's application indicated in its request that the current municipal solid waste treatment capacity in Laos covers approximately 40% of total waste generated in the country, primarily due to inadequate waste segregation and collection systems. The application of Lao PDR further clarified in its response to the Commission's request for additional information, that the country's current municipal solid waste treatment capacity mainly consists of municipal landfill facilities. The recycling capacity for paper waste is estimated at 10,000- 15,000 tonnes per year and is expected to increase to approximately 20,000-25,000 tonnes per year within the next ten years, due to expansion of existing facilities and policy efforts to promote waste recovery.

These figures show that the waste management system of Lao PDR is mainly based on landfill and that insufficient capacity is available for the recycling of paper waste in general, and in particular for imported paper waste.

Moreover, Lao PDR's request indicated that the management of imported paper waste may have implications for the management of domestically generated waste, as large import volumes can place additional pressure on capacity inspection, storage, sorting and recycling infrastructure, and may affect the domestic recyclable materials market. If not properly controlled, imported waste with higher contamination levels could increase the amount of residual waste requiring final disposal and divert limited resources away from domestic waste streams. The measures indicated by the application of Lao PDR to counter these effects, are not convincing to ensure the environmentally sound management of imported paper waste, while safeguarding the domestic waste management system.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Waste management activities in Lao PDR are regulated under national environmental and waste management regulations implemented by the Ministry of Agriculture and Environment and provincial authorities. Operators are required to register their activities and environmental obtain permits or approvals, depending on the type and scale of the facility. Permits specify operational conditions, waste types and quantities, pollution control measures, residual waste management, monitoring, and reporting.

The application of Lao PDR did not provide a detailed description of its legal framework to ensure that residual waste generated through the recovery operation(s) of the wastes concerned by the application are managed in an environmentally sound manner. The application of Lao PDR did clarify in its response to the Commission's request for additional information that the country has established legislative requirements to set emission and discharge limits for key pollutants, including particulate matter, sulfur dioxide (SO₂), nitrogen oxides (NO_x), organic pollutants (COD and BOD), suspended solids, and pH. It also explained that facilities are required to apply appropriate techniques consistent with best available practices, taking into account facility type and scale.

Overall, the application of Lao PDR did not provide a sufficiently detailed explanation of relevant legal provisions, regarding waste management, pollution control and environmental protection, or on enforcement, inspections, and penalties.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Lao PDR only provided general explanations on the implementation and enforcement of its legal framework regarding waste management and waste shipment, claiming that compliance with the requirements is verified through monitoring, inspections, and enforcement measures, including corrective orders, sanctions, and suspension of operations where environmental risks are identified. No further details were provided however.

Overall, the application of Lao PDR provided an inadequate insight in its implementation and enforcement measures regarding waste shipments and management.

One facility is named in the application along with its address. Neither the permit number nor the authorised treatment capacity is mentioned, but the application claims the facility is duly permitted.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Lao PDR ratified the Basel Convention and indicated that it fulfils its reporting obligations under all the international agreements it has ratified. Lao PDR also informed about the fact that it has not ratified two conventions (Freedom of Association and Protection of the Right to Organise Convention, and Right to Organise and Collective Bargaining Convention) as well as on the constraints it has resulting in an unlikelihood to soon ratify these conventions.

XI.2 Lao PDR: conclusions

Lao PDR submitted an application to import paper waste.

As a result of the assessment above, Lao PDR could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

Annex XII: Malaysia

Malaysia submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Malaysia to provide additional information. Malaysia provided such information on 31 October 2025. Following a second request for additional information from the Commission, Malaysia responded on 9 January 2026 that there will be no further response to the additional request for information, as the official information and data are not available.

The application of Malaysia referred to non-hazardous plastic waste classified under code B3010. Please note that this entry was effective only until 31 December 2020, and from 1 January 2021, non-hazardous plastic waste could be classified under the Basel code B3011. The European Commission assumes, that the request of Malaysia may be interpreted as covering non-hazardous plastic waste classified under code B3011. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste is prohibited to be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Malaysia.

The application submitted by Malaysia covered the following 7 types of waste, eligible under Title IV of the WSR.

- Ferrous metal: B1010;
- Non-ferrous metal: B1010;
- Paper waste: B3020 ;
- Wood waste: B3050;
- Rubber waste: B3140 (Waste pneumatic tyres);
- Textile waste: B3030;
- Glass waste: B2020.

XII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of Malaysia provided satisfactory information on its national waste management strategy and plan.

The application of Malaysia provided the total amount of waste generated and 10-year projections of the total quantity of waste generated. The application indicates that sanitary landfills remain the main disposal method, although Malaysia is pursuing a strategic transition toward Waste-to-Energy (WtE) technology to reduce landfill dependency and enhance waste treatment.

As for the methodology to collect and validate data, Malaysia uses a combination of national surveys, waste audits, and data from waste management facilities to calculate and monitor waste generation, treatment, recycling rates, and littering patterns.

The application did not provide any quantitative data on the current treatment capacity for waste in general, as it stated that national-level indicators only provide an indicative overview of waste management performance. Consequently, no data on 10-year projections was provided.

Malaysia's application provided the overall proportion of domestic waste that is separately collected (i.e., 25-30%), the proportion of each of the most important types of waste that is separately collected (i.e., organic waste, plastic packaging waste, e-waste, and hazardous household waste such as batteries, paint, pesticides, and pharmaceuticals). For each type of waste, the application also provided objectives and measures to promote their collection.

The application of Malaysia provided possible objectives and measures to reduce the rate of landfilled waste in the future, such as waste minimisation and recycling targets, the development of waste-to-energy facilities, the introduction of Extended Producer Responsibility (EPR) schemes, and the transition to sanitary landfills. Likewise, Malaysia provided in its application possible objectives and measures to increase the rate of recycled waste in the future, such as the expansion of recycling infrastructures, the introduction of separation requirements and the implementation of collection facilities, and the implementation of circular economy roadmaps.

The application included the estimate of municipal solid waste ending up as litter (i.e., 10-15%), as well as several measures to prevent and clean up litter, such as public awareness campaigns, fines, installation of public bins and collection facilities.

Finally, Malaysia provided in its application the amount of imported waste in 2024, and cited the source of the data, being the Department of Statistic Malaysia (DOSM). Concerning the impact of imported waste on the environmentally sound management of waste in the country, Malaysia regulates imports of metal waste, paper waste and plastic waste through the Certificate of Approval (COA) system. Importers must hold a valid Manufacturing License or exemption and demonstrate the capacity to recycle or process the imported waste into finished goods.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Malaysia's application provided a comprehensive description of the regulatory framework governing the transport of non-hazardous waste, as it stated that any establishment transporting waste professionally must be registered and licensed. In particular, under the Solid Waste and Public Cleansing Management Act 2007, operators must obtain a license from a dedicated body that was established to administer and enforce the waste law in Malaysia (Solid Waste and Public Cleansing Management Corporation (SWCorp)), which assesses technical and financial capacity. Each transport vehicle requires a permit, must meet safety and maintenance standards, and display license details. For hazardous waste, transporters need Department of Environment (DOE) licensing under the Environmental Quality (Scheduled Wastes) Regulations 2005, with traceable documentation. SWCorp and DOE maintain registers of licensed operators and monitor compliance.

The application demonstrated a multi-layered regulatory framework for pollution control aligned with international standards. Air pollution is primarily regulated under the Environmental Quality Act 1974, supported by the Occupational Safety and Health Act 1994 and the Factories and Machinery Act 1967, which establish emission controls and

safety requirements for industrial and waste management activities. Water pollution is addressed through the Environmental Quality Act, together with the Pesticides Act 1974 and the Food Act 1983. Soil protection is ensured through the Solid Waste and Public Cleansing Management Act 2007 and pesticide controls.

The application showcased a clear legal and regulatory framework for the import, export, transit, and transshipment of regulated wastes, aligned with the Basel Convention's Prior Informed Consent (PIC) procedure. Applications are submitted via the national ePermit system, while hazardous or scheduled waste additionally require approval and consent from the Department of Environment.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Malaysia informed that landfill and waste facility permits are subject to EIA approval, technical and safety assessments, financial guarantees, and closure and post-closure obligations, including monitoring and Abandonment and Decommissioning Plans. Site-specific requirements for sanitary landfills cover liners, leachate and gas management, and monitoring systems. However, permit conditions for waste treatment facilities do not fully specify waste types, quantities, or detailed operational measures for all treatment categories.

The application demonstrated that inspection planning is embedded within the mandate of a number of authorities, with activities coordinated under the Ministry of Natural Resources and Environment Sustainability (NRES). The DOE conducts routine inspections at waste management facilities, including landfills, incinerators, and recycling centres, while Customs performs systematic checks at ports involving document verification, identity confirmation, and physical inspection of shipments. Malaysia also provided quantitative data on inspections conducted in 2024-2025. Regarding penalties, Malaysia's application demonstrated a clear legislative basis, including fines up to RM10 million and imprisonment for up to seven years. These penalties are effectively implemented through DOE and RMCD enforcement actions, with inter-agency coordination ensuring that offences such as illegal import, export, or processing of waste are prosecuted. Suspending or revoking Certificates of Approval (CoA) in cases of non-conformity with inspection guidelines is another measure in place.

The Environmental Quality Act 1974 provides a clear legal basis for systematic and non-routine inspections by the Department of Environment across waste treatment, disposal, collection, and transport activities. The framework prohibits illegal dumping, enables effective enforcement actions, and provides for dissuasive penalties, including fines, licence revocation, and facility closure. Emissions from hazardous waste facilities are subject to continuous monitoring, and waste movements are inspected to ensure traceability and compliance, including for transboundary shipments. Authorities may also intervene in cases of environmental or public health risk and suspend operations until compliance is restored. However, the legislation does not clearly establish a legally defined or permit-specific monitoring frequency set by the competent authority. The application provided information on the number of inspections carried out in 2024/2025 on the shipments of waste (with a focus on e-waste) as well as for waste management facilities (for 2024). No information was provided on the follow-up to these inspections and possible penalties.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Malaysia has ratified the Basel Convention. The country complies with the reporting obligations of the Basel Convention. No issues were identified concerning the implementation of other obligations of the Basel Convention.

Concerning the other 13 multilateral agreements, Malaysia has ratified 8 of these agreements.

It has signed two other environmental agreements, namely the Minamata Convention and the Stockholm Convention. At present, Malaysia is in the process of ratifying the Stockholm Convention and is planning to complete the ratification by 2027. Concerning the Minamata Convention on Mercury, Malaysia is studying whether the country is ready to ratify it. However, Malaysia stated that it is prioritising the ratification of the Stockholm Convention.

Finally, Malaysia has neither signed nor ratified the following three ILO Conventions: the Freedom of association and protection of the right to organise Convention, the Abolition of forced labour Convention, and the Discrimination (employment and occupation) Convention. Malaysia did not provide any information on whether it intends to ratify these conventions, nor whether it is nevertheless implementing the agreements through domestic legislation.

XII.2 Waste-stream specific assessments

Malaysia provided a list of all facilities treating the waste concerned by the request, including their names and addresses, their permit numbers, and the types of waste treated. However, no information on the treatment capacity of these facilities was provided. Furthermore, the application did not provide any information concerning facilities treating wood waste, rubber waste, textile waste or glass waste.

Ferrous metal waste and non-ferrous metal waste

The application provides a general description of Malaysia's national waste management strategy or plan regarding ferrous metal and non-ferrous metal waste. The application did not provide an estimate of the country's treatment capacity for ferrous metal and non-ferrous waste concerned neither did it provide a 10 years projection of the country's treatment capacity, nor the proportion of domestic waste concerned by the request that is landfilled and the related methodology to estimate or calculate such figures.

The application indicated that permits and licences under the Environmental Quality Act 1974 specify emission and discharge limits, pollution control systems, and monitoring and reporting obligations. Licences are issued for fixed terms and require compliance-based renewal.

Malaysia's application provided sufficient information on the management of residues coming from ferrous metal and non-ferrous waste. In its overview, Malaysia states that installations must implement pollution control systems, Emergency Response Plans, and

competent personnel, while permits set emission limits, monitoring obligations, and operational conditions. Landfills and waste-to-energy plants are subject to closure and post-closure requirements, with monitoring of leachate, gas, and environmental parameters. Waste must be characterised and tested in licensed laboratories before treatment or disposal. However, the application does not provide evidence of landfill waste acceptance criteria, verification procedures, bans on dilution or landfilling of recyclable waste, annual compliance testing, or limit values for co-disposal of hazardous and non-hazardous waste.

The application provided insufficient information on general pollution controls for ferrous metal and non-ferrous waste. It provided information on measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission limits and air filtration or scrubbing technologies. Water consumption and wastewater emissions are addressed via leachate treatment and industrial effluent standards, including advanced treatment systems. Environmental risks in waste storage, handling, and transfer are mitigated through licensing, secure facilities, consignment notes, record-keeping, competent personnel, and Emergency Response Plans. However, the application of Malaysia did not include requirements for maintaining a stable shredder feed, preparing energy efficiency plans or energy balance records, recovering secondary materials, controlling energy use in secondary copper production, preventing diffuse emissions during scrap pretreatment, or reducing HCl, Cl₂, and HF emissions. Furthermore, the application informed that an Environmental Management Plan must be prepared and implemented at facility level which includes monitoring of water and air quality and should address key pollutants such as heavy metals, dust, dioxins, sulphur dioxide and NO_x. The application however did not clarify within which framework such pollutants are to be addressed and what emission limits can be acceptable.

Paper waste

The application provides a sufficiently detailed description of Malaysia's national waste management strategy or plan regarding paper waste.

The information on permits and licences is generally adequate for paper waste. Nevertheless, there are no legal limits on total organic carbon in ash, minimum temperatures for gas treatment, or fully detailed operational and safety measures for all waste treatment facilities.

More information is needed on the management of residues from paper waste as well as on how the country addresses landfill waste acceptance criteria, verification procedures, bans on dilution or recycling of waste, annual compliance testing, or controls on emissions and co-disposal of hazardous and non-hazardous waste.

More detailed information on pollution control for paper waste management should be gathered. The application does not fully address requirements for energy efficiency plans or energy balance records, reduction of electrical or thermal energy in processing, recovery of secondary materials. Moreover, several key pollutants related to paper waste and residual waste treatment such as heavy metals, dust, dioxins, sulphur dioxide and NO_x are not addressed.

Wood waste

Concerning wood waste, Malaysia's description of the national waste management strategy or plan demonstrated that it has an adequate permitting framework, as for waste streams mentioned above. However, more information is needed on what are the legal limits on total organic carbon in ash, minimum temperatures for gas treatment, or fully detailed operational and safety measures for all waste treatment facilities.

The application does not provide the following elements: an estimate of the annual quantity of wood waste generated in the country, how the quantities of waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity, 10 years projection of the country's treatment capacity, the proportion of domestic wood waste that is landfilled, and the proportion of domestic waste concerned that is recycled.

The information provided regarding the management of residues of wood waste could be more elaborated. More information should be gathered on how the country addresses landfill waste acceptance criteria, verification procedures, bans on dilution or recycling of waste, annual compliance testing, controls on emissions and co-disposal of hazardous and non-hazardous waste, or technical regulations governing waste gases in biomass combustion plants.

The application described Malaysia's national pollution control strategy for wood waste management with a number of general requirements. Nonetheless, some specific requirements and measures are not fully addressed, including for energy efficiency, recovery of secondary materials, VOC reduction, water reuse controls, and systematic pollutant control in kilns (including HCl, HF, Cl₂, and organohalogenes). Moreover, some key pollutants concerning wood waste treatment are not addressed.

Rubber – waste tyres

Regarding rubber waste, Malaysia's description of the national waste management strategy or plan demonstrated that it has an adequate permitting framework, as for waste streams mentioned above. However, more information is needed on what are legal limits on total organic carbon in ash, minimum temperatures for gas treatment, or fully detailed operational and safety measures for all waste treatment facilities. The same data is missing as highlighted above for wood waste.

Similarly detailed information to the one regarding paper waste is provided regarding the management of residues from rubber waste. Nevertheless, more information on landfill waste acceptance criteria, verification procedures, bans on dilution or recycling of waste, annual compliance testing, or controls on emissions and co-disposal of hazardous and non-hazardous waste should be provided.

The application described Malaysia's national pollution control strategy for rubber waste management with a number of general requirements. Nonetheless, some specific requirements and measures are not fully addressed, including for energy efficiency, recovery of secondary materials, VOC reduction, water reuse controls, and systematic pollutant control in kilns. Moreover, several key pollutants relevant to rubber waste treatment such as heavy metals, dust, dioxins, sulphur dioxide and NO_x are not addressed.

Textile waste

Regarding textile waste, Malaysia's description of the national waste management strategy or plan demonstrated that it has an adequate permitting framework, as for waste streams mentioned above. However, more information is needed on what are legal limits on total organic carbon in ash, minimum temperatures for gas treatment, or fully detailed operational and safety measures for all waste treatment facilities. The same data is missing as highlighted above for wood waste.

Similar as for paper waste, detailed information is provided regarding the management of residues from textile waste. However, the application did not provide sufficient evidence of landfill waste acceptance criteria, verification procedures, bans on dilution or recycling of waste, annual compliance testing, or controls on emissions and co-disposal of hazardous and non-hazardous waste.

The application described Malaysia's national pollution control strategy for textile waste management with a number of general requirements. Nonetheless, some specific requirements and measures are not fully addressed, including for energy efficiency, recovery of secondary materials, VOC reduction, water reuse controls, and systematic pollutant control in kilns – dust in particular. Moreover, several key pollutants relevant to textile waste treatment were not addressed.

Glass waste

Regarding glass waste, Malaysia's description of the national waste management strategy or plan demonstrated that it has an adequate permitting framework, as for waste streams mentioned above. However, permit conditions for waste treatment facilities do not fully specify waste types, quantities, or detailed operational measures for all treatment categories. The same data is missing as highlighted above for ferrous and non-ferrous metal waste and paper waste.

Similarly detailed information to the one regarding paper waste is provided regarding the management of residues from glass waste. However, more information should be provided on landfill waste acceptance criteria, verification procedures, bans on dilution or landfilling of recyclable waste, annual compliance testing, or limit values for co-disposal of hazardous and non-hazardous waste.

The application described Malaysia's national pollution control strategy relevant to glass waste treatment. It specifies measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through binding emission limits and the mandatory use of air filtration and scrubbing technologies. However, the overview of the framework provided does not fully address several essential technical aspects. In particular, the application does not develop requirements for controlling input materials in glass production, reducing metal emissions during glass melting, or ensuring adequate filtration and material control processes in glass melting operations. Furthermore, no quantitative performance values are provided for these processes, and key operational pollutants specific to glass waste treatment are not addressed.

XII.3 Concerns raised by environmental non-governmental organisations

In December 2025, civil society organisations approached the European Commission, expressing concerns regarding the impacts of imported waste to the domestic waste management system in Malaysia.

The concerns expressed cover:

- local recyclers' inability to manage wastepaper, metal waste, residual plastic waste, textile waste and waste tyres in an environmentally sound manner;
- challenges with the enforcement capacity of Malaysian government agencies to monitor and stop illicit waste trafficking and dumping; and
- the risks of criminality and corruption involved in waste trafficking.

The Commission provided this information to the Malaysian authorities for comments, but did not receive a reply.

XII.4 Malaysia: conclusions

Malaysia submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste, wood waste, rubber waste, textile waste and glass waste.

As a result of the assessment above, Malaysia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste and glass waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the Malaysian authorities to provide additional information on the implementation of measures for all concerned waste streams to ensure (i) proper monitoring and mitigation of the air, soil and water pollutions related to the waste treatment, (ii) harmful emissions reduction, and (iii) efficient management of residual waste.

Annex XIII: Mauritius

Mauritius submitted its application on 18 April 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Mauritius to provide additional information. Mauritius provided such information on 19 September 2025. Following a second request for additional information from the Commission, Mauritius shared additional information on 9 January.

The application of Mauritius referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Mauritius.

The application submitted by Mauritius further covered one eligible type of waste, namely paper waste: B3020.

XIII.1 Generic assessment - Waste-stream specific assessment

As Mauritius' request concerns only one specific type of waste to be imported to one specific facility, the assessment of the criteria related to the overall situation of waste management in the country and of the criteria that are specific to the type of waste that the country wishes to import from the EU, are assessed together below.

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of Mauritius provided estimates of the amount of waste generated and the expected annual increase in waste generation. It furthermore provided an estimation of its waste treatment capacity. The proportion of paper waste that is landfilled is approximately 68%.

Mauritius' application indicated that in Mauritius currently no practice of household waste segregation and separate collection exists, but indicated that the country plans to implement a source segregation programme and two new facilities by 2027 to significantly increase recycling and composting rates. By 2030, these initiatives aim to divert about 70% of waste from landfills, with clean streams of organic, paper, and plastic waste provided for resource recovery.

The application provided information on objectives and measures to increase recycling of paper waste. Mauritius' application did not provide information on the quantity of waste that is littered.

Mauritius' application stated that the only recycling plant in the country will import 3,500 tonnes of waste to recycle it. However, the application did not fully elaborate the country's broader strategy to ensure the environmentally sound management of waste imported into its territory and more information is needed.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Mauritius' application provided sufficient information on its framework related to permitting for waste treatment facilities. The application stated that no waste incineration facilities exist in the country, and that the non-recycled paper and residual waste are landfilled. The application further provided information showing that permits for waste management activities include emission limits, monitoring, environmental reporting, and requirements for site closure and after-care. The legal framework requires permits for all waste treatment activities, outlining technical, operational, and closure provisions. Permits and inspections are mandated for landfill operations.

However, more information should be provided to fully assess whether certain permit requirements are covered by its permitting system, such as those covering non-normal operating conditions or compliance assessment. The legal obligation for regular reconsideration and updating of permits was not fully described, and further details would be needed on technical competence, financial security, pre-operation inspection, and specific permit conditions for landfills (like class, waste types, and quantities).

Mauritius' application provided some information on its framework related to permitting or registering transport of waste, indicating that the licensing and registration of the transport of waste falls under the 'Dumping and Waste Carrier Licensing Regulations 2021'.

Mauritius' application described its general provisions designed to ensure that residual waste generated through the recovery operation for paper waste is managed in an environmentally sound manner. Mauritius appropriately demonstrated that preventive measures, environmental impact assessments, mitigation, and monitoring are required for installations through the PER process, and national standards demand best available techniques (BAT) and resource efficiency. However, Mauritius indicated that the main disposal method for residual waste generated through the recovery operation(s) of imported waste is landfill. The country also has environmental standards and monitoring plans in place for permitting, and some landfill operational monitoring and closure/after-care procedures are outlined, with inspection powers and assignment of closure/after-care to a receiver manager. However, Mauritius does not fully address the permit requirements. More information should be provided regarding emission controls, operational standards, monitoring protocols, waste acceptance criteria, and quality assurance measures. The application did not fully elaborate on the requirements for the safe handling, treatment, and disposal of waste, as well as on mechanisms for ongoing compliance and oversight within the current legal and operational structure.

Mauritius' application described the country's general legal requirements for pollution control, emission limits and environmental standards applying to waste treatment operations. However, more information is needed on the optimisation or monitoring of water use, or the management of wastewater. Furthermore, Mauritius' application does not provide sufficient details on environmental risk reduction in waste storage, handling, and transfer (including staff competence and spill control), nor on control measures for soil, groundwater, dust, and wind drift. More information should be gathered to fully demonstrate requirements or procedures for operational controls in the case of breakdowns. In addition, Mauritius did not specifically state that it has established emission limits values for important parameters, namely heavy metals, dust, dioxins and furans, NO_x, SO₂.

The application provided general information on Mauritius' domestic legislation regarding air, water and soil pollution. However, it did not fully elaborate on the measures to ensure the protection of the environment and human health in the context of waste management operations, in alignment with the EU benchmarks.

Mauritius' application provided an acceptable insight in the implementation of domestic legislation governing the import and export of the waste types covered by the request as it has some rules in place for the import and export of waste, including registration, process assessment, and requirements to return contaminated waste. More information is needed on Mauritius' implementation of the prior informed consent process, financial guarantees, or comprehensive documentation and contract requirements, as prescribed by the Basel Convention (see also subsection d) below on the point of attention regarding the implementation of that Convention).

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Mauritius' application generally demonstrated that provisions on enforcement, inspection and penalties are designed to ensure the implementation of domestic and international requirements on waste management and the shipment of waste as it provides satisfactory information on several key areas: requirements for environmental management plans, systems for both routine and non-routine environmental inspections (with penalties for littering and effective enforcement measures), and procedures for monitoring emissions and record-keeping. Notably, the application explained violations of the Waste Management & Resource Recovery Act 2023 will lead to the issuance of a first formal notice, which will provide an opportunity for corrective actions within a specified timeframe. If the violation persists, an enforcement or prohibition notice may be issued. Failure to comply with the Act may result in the imposition of a fine or prosecution. Mauritius described that enforcement officers conduct inspections and monitoring as part of the permit and compliance process. However, there is no explicit evidence of a formal inspection planning process, nor detailed requirements for spot checks on shipments and recovery, or for physical checking of waste.

Mauritius in its application indicated that inspections and monitoring are carried out by enforcement officers and technical enforcement officers and spot checks by customs officers on imported consignments was mentioned. However, more quantitative data on the number or nature of inspections, and elaborate on systematic spot checks or physical checks, should be provided. Also, the frequency-setting process for monitoring is not fully described, and the comprehensiveness of the inspections system was not fully detailed. While remedial actions are required for incidents and accidents, more detailed information is needed on the processes and responsibilities. Fines for various offenses were referred to, with increasing penalties for repeated offenses. Penalties are claimed to be effective, proportionate, and dissuasive, but more information should be provided on the number or size of penalties imposed in practice.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Mauritius has ratified the Basel Convention, and the application indicated that the country is in the process of fully transposing the Basel Convention's provisions in national law.

The 13 other multilateral agreements are ratified by Mauritius and compliance with core obligations, such as reporting, was checked and no issues were observed.

XIII.2 Mauritius - conclusions

Mauritius submitted an application to import paper waste.

As a result of the assessment above, Mauritius could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation, for paper waste.

In addition, the Commission services emphasise the need for the authorities of Mauritius to provide additional information on (i) the implementation of measures to improve separate waste collection, reduce landfilling and increase recycling capacity for the requested waste stream, (ii) permit or registration obligations for the collection, transport, or treatment of non-hazardous waste, (iii) enforcement of the inspections and penalties related to waste shipments and management, and (iv) measures taken to ensure proper monitoring and mitigation of the air, soil and water pollutions related to the treatment of the waste concerned and its residual waste.

Annex XIV: Moldova

Moldova submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Moldova to provide additional information. Moldova provided more information on 29 October 2025 and 6 January 2026.

The application of Moldova referred to electrical and electronic waste that could be classified under the codes GC010 and GC020. These codes are no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Moldova.

The application submitted by Moldova covers 5 specific eligible types of waste, namely ferrous metal waste, non-ferrous metal waste, glass waste and paper waste. The application specifies these types of waste with the following customs codes:

- Ferrous metal waste: B1010, B1040, B1250, B1200;
- Non-ferrous metal waste: B1030, B1100, B1115;
- Paper waste: B3020;
- Textile waste (cotton waste): B3030;
- Glass waste: B2020, GE020
- Mineral waste: B2040.

XIV.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of Moldova provided sufficient information on its national waste management strategy and plan, in view of assessing the national waste management situation in the country.

The application of Moldova provided data regarding the annual quantity of total waste generated in the country (an estimated 372 kilo tonnes in 2023). This figure however only covers industrial waste.

The application of Moldova provided an estimate for the waste treated in 2023, which is a lower amount than the industrial waste generated.

The application did not provide a prospect of waste generation and treatment capacity in the next decade.

The application of Moldova described the proportion of the most important types of domestic waste (paper, glass and metals) that are separately collected, and the amount of total waste generated that is separately collected. The application of Moldova described measures and objectives to increase this proportion in the future, including efforts to implement Extended Producer Responsibility (EPR), which are starting to produce positive results, as regards the separate collection of certain categories of waste. For example, glass

waste collection increased from 42.1 thousand tons in 2022 to 45.5 thousand tons in 2023. Paper waste collection increased from 27.7 thousand tons to 32.7 thousand tons. In addition, Law No 209/2016 on waste provides for the implementation of a number of economic instruments to incentivise the application of the waste management hierarchy, including deposit refund systems (DRS) for single-use and reusable packaging. At the same time, Law No 178/2025 on the public sanitation service, recently approved, provides for separate collection and transport of municipal waste and sorting of wastepaper, metal, plastic and glass separately collected from municipal waste in sorting stations.

The application of Moldova indicated that still a majority of the municipal waste generated in the country is landfilled, but that there are currently no direct statistical data to estimate the proportion of specific types of waste going to landfill.

The application of Moldova explained that data on the quantities of residual waste resulting from recovery facilities are not available and that no recording and reporting format is in place to monitor such waste. More efforts to gather such data should be made.

The application of Moldova indicated that specific figures on littered waste quantities are not available due to missing data. Moldova is taking measures to prevent and clean up litter such as expanding collection and sorting facilities to reduce illegal dumping, raising public awareness, implementing stricter rules and closing illegal dumpsites.

The application of Moldova provided information on the quantities of specific waste types that are imported, but not a total amount for all waste. The application also provided an overview of the strategy to ensure the environmentally sound management of the imported waste. In particular, the 2023-2027 National Waste Management Program includes measures to strengthen legal and regulatory framework, enhance waste import monitoring and compliance, infrastructure development for safe processing and disposal, strengthening public awareness, and international cooperation. The main measures to address impacts of imports on domestic waste management include preventing overloading national waste infrastructure by establishing quotas, promoting domestic waste management prioritisation, and encouraging investments. However, more information could be provided on the extent to which this strategy is put in place, and the extent to which the management of imported waste impacts the management of domestically generated waste.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Moldova clearly stated that, in accordance with Law No 209/2016 on waste, establishments and undertakings which collect and transport waste on a professional basis, must be registered and that this register is maintained by the competent authority.

The application of Moldova demonstrated a robust legal and regulatory framework for waste management. The country requires periodic and systematic monitoring and inspections of waste management facilities, including both planned and unannounced checks, and mandates compliance with national and international standards. Non-routine inspections are triggered by non-compliance, and the legislation provides for strong prohibitions and penalties against illegal dumping and littering. Operators are obliged to keep comprehensive records and are subject to regular scrutiny, with permit renewal dependent on compliance. The legal system also ensures effective incident and accident

response measures, including suspension of operations for serious breaches, while penalties imposed are substantial and designed to deter violations. There are clear requirements for the regulation of collection, transport, and cross-border waste movement, as well as strict financial guarantees and closure plans for landfill operations.

The application of Moldova provided comprehensive evidence that it implements domestic legislation governing the import and export of waste, equivalent to the PIC procedures. The import of waste in the country is strictly regulated through a combination of authorisation requirements, customs procedures, and oversight by environmental authorities.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Specifically regarding landfilled waste, it is noted that a ban on landfilling separately collected waste will start to apply from 2030 onwards.

The application of Moldova provided clear evidence of legislative provisions mandating inspections for waste management and transboundary shipments. In particular, the application provides comprehensive details on Moldova's legislative framework governing inspections. Law No 209/2016 and Law No 131/2012 set out clear provisions for state control, including the possibility of suspending operations in cases of serious non-compliance. The role of competent authorities and the procedures for on-the-spot examination, reporting, and permit review are thoroughly described. The country's response to the request for information demonstrated active implementation and monitoring, including both planned and unannounced inspections.

Moldova's legislation includes also robust provisions for penalties, explicitly allowing for suspension or withdrawal of permits in cases of serious or repeated violations, as well as financial penalties. The provided figures and details confirm that penalties are not only legislated but actively imposed and collected.

The application of Moldova provided a list of facilities authorised to treat the wastes covered by the request. For all facilities names, addresses, permit numbers and the specific waste codes that the facilities are authorised to recover, were provided. The authorised treatment capacities were not indicated, because information on plant or treatment capacities is not contained in the text of the permit issued.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Moldova has ratified the Basel Convention as well as the other 13 multilateral agreements in Annex VIII of the WSR. All reporting obligations are complied with and no issues were observed regarding compliance with the remaining obligations.

Overall, Moldova fulfils its relevant international commitments.

XIV.2 Waste-stream specific assessments

The application of Moldova provided sufficient detail on permit content requirements, periodic permit reviews, closure and after-care conditions, prohibition of operation without a permit, landfill permit issuance and content, as well as specifications for waste treatment permits. The application also provided sufficient insight regarding the legal framework for the management of residual waste resulting from the treatment of the waste concerned by the request.

Metal waste

Moldova's application provided sufficient detail on permit content requirements, periodic permit reviews, closure and after-care conditions, prohibition of operation without a permit, landfill permit issuance and content, as well as specifications for waste treatment permits. The legal framework for the management of residual waste resulting from the treatment of ferrous metal waste can be assessed as sufficiently equivalent. The country's laws and regulations detail robust permit requirements, including technical specifications, monitoring, and record-keeping.

Moldova's legislative framework incorporates energy efficiency planning, water optimisation, documented and regulated hazardous waste handling, control of scrap quality through inspection and testing (including radiological checks), and safe storage practices for waste. These elements are underpinned by references to best available techniques (BAT) and are reflected in national permitting and operational procedures. Additionally, Moldova monitors several key pollutants, such as total organic carbon, heavy metals, dust, hydrogen fluoride, nitrogen oxides, and sulphur dioxide, with established emission limits for these substances. There is however an absence of explicit requirements for advanced wastewater treatment processes, as well as targeted measures to reduce diffuse dust emissions.

Paper waste

More information regarding the country's treatment capacity for such waste, and the prospects for the next decade, should be gathered. The application inter alia missed a specific figure for the share of paper waste that is landfilled in Moldova. As regards residual waste management in incineration facilities, Moldovan legislation, as described in the application, does not provide for specific substance control obligations in kilns. A point of attention remains the development of explicit requirements for advanced wastewater treatment processes, and detailed provisions for dust abatement, wind drift control, or soil/groundwater protection in storage yards, as well as of legal requirements for VOC abatement techniques in paper coating operations, and no explicit legal requirement for recovery or pretreatment of coating colours and binders.

Textile waste

More information regarding the country's treatment capacity for such waste, and the prospects for the next decade should be gathered. For example, details on the share of textile waste that is landfilled and littered in Moldova were not provided. The application also did not provide sufficient information on requirements for advanced wastewater

treatment processes, and detailed provisions for dust emission reduction specifically kiln dusty operations or the treatment of wastes used as fuel or raw materials in kilns. No explicit legal provisions requiring the use of adsorption, biofilters, thermal oxidation, wet scrubbing, or cryogenic condensation for organic compound emission control were mentioned in the country's application.

Glass waste and mineral waste

More information regarding the country's treatment capacity for such waste, and the prospects for the next decade should be gathered. Also, details on the share of glass waste that is landfilled and littered in Moldova were not provided. The measures to control and limit pollution during the treatment of glass or mineral waste should be further clarified. While emissions limits and best practices are referenced broadly, the application did not provide evidence that the legal framework requires installations to use any of the mentioned techniques (cyclone, fabric filter, wet scrubbing, or water injection into shredders) to specifically reduce emissions of heavy metals, dust, dioxins and furans, or PCBs. In addition, legal or regulatory requirements mandating the selection of low-impurity or low-metal raw materials, or obligations for the use of alternative raw materials or fuels to reduce emissions could be better explained. While the process describes the use of raw materials and additives, and mentions that some are used for decolourising, there is no indication of regulatory obligations to limit metal content or to select materials based on their emission profiles. The application did not indicate any specific legal obligations mandating the selection of low-metal raw materials for glass melting. There is no mention of regulatory standards setting maximum allowable metal content in input materials. Additionally, while the technological process includes stages such as conditioning and mixing, there is no reference to the requirement or implementation of filtration systems for the abatement of metal emissions from the melting process.

Overall, the country's implementation of best available techniques is at an early stage, with emission limits not yet fully enacted. Furthermore, monitoring does not cover total suspended solids, total volatile organic compounds, or dioxins/furans, leaving important pollutants unaddressed in the current framework.

XIV.3 Moldova: conclusions

Moldova submitted an application to import ferrous metal waste, non-ferrous metal waste, glass waste and paper waste.

As a result of this assessment, Moldova could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for paper waste, textile waste, glass waste ferrous and non-ferrous waste and mineral waste. In addition, the Commission services emphasise the need for the authorities from Moldova to demonstrate how the implementation of the 2023-2027 National Waste Management Programme is progressing and delivering results, as well as which measures are being taken to ensure that all pollution linked to waste management facilities for all waste requested (paper, textile, glass) is being properly monitored and mitigated. Additional information on the number of inspections and penalties linked to breaches of environmental legislation in the waste sector is also essential. The Commission intends to reevaluate the inclusion of Moldova into the List of

countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

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Annex XV: Monaco

Monaco submitted its application on 17 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Monaco to provide additional information. Monaco provided such information on 18 September 2025, 10 January and 13 March 2026.

The application of Monaco referred to waste code 20 03 99 that concerns municipal waste and corresponds to Basel code Y46. According to Article 39(1) point (c) of the Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such of waste will not be considered when assessing the application of Monaco. This request for additional information and clarification concerns only other non-hazardous waste.

The application submitted by Monaco covers 3 specific types of waste, eligible under Title IV of the WSR:

- Wood waste: B3050 (further specified with EU List of Waste codes 191207 and 200138);
- Organic and agro-food waste: B3060, B3065, B3070, and further specified under EU List of waste codes 020103, 020106 and subchapter 2002);
- Textile waste: B3100 and B3110.

XV.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Monaco provided in its request the total annual quantity of waste generated in the country, the annual quantity of waste generated for each type of waste concerned by the application, as well as how these figures are estimated to develop in the following 10 years.

Monaco also provided data concerning the treatment capacity of the facility designated to manage the waste covered by the request altogether, not specifically per waste type and estimates of how this capacity is expected to develop in the next ten years. Monaco informed that the treatment capacities relate to energy recovery of waste through thermal treatment (R1). Moreover, Monaco stated that the treatment capacity will remain stable over the next decade.

Monaco provided the proportion of the waste separately collected along the most important types of domestic waste: glass, cardboard, paper, and scrap metal.

Monaco also provided information on objectives and measures, namely reducing GHG emissions related to waste treatment (e.g. by preventing waste generation and enhance fast material recovery), and increasing the rate of sorted and recovered waste (e.g. all buildings to be equipped with specific sorting bins).

Monaco indicated that the quantities of waste provided correspond to door-to-door collection from households, restaurants and hotels, economic and industrial activities,

public administrations, and port facilities, excluding hazardous waste. However, it did not specify how these quantities are calculated.

Monaco explained that no residual waste is expected after the treatment of the imported waste as this waste is incinerated. No information is however provided on how residues of the incineration are managed.

Monaco indicated that there is no littering observed on its territory, but it specified that 95 tonnes of wild deposits were collected on public roads in 2023. However, as the territory is mainly urbanised, these deposits did not occur in a natural environment. Monaco provided limited information on its measures and legislation in place to prevent and clean up litter, and it did not provide specific information on the methodology for calculating littering.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Monaco's legislation to regulate companies engaged in waste transport activities is adequate. Such companies must undergo an authorisation procedure, which includes registration.

Monaco demonstrated installation-level environmental controls, particularly for its waste-to-energy plant, including detailed emission limit values, continuous monitoring systems, wastewater treatment steps, and an active inspection and enforcement mechanism. See for more elements in the waste specific assessment below.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Monaco's application adequately provided comprehensive information on the enforcement and monitoring of waste management and environmental protection, including details of systematic and non-routine inspections, continuous and periodic emissions monitoring, obligations for operators in the event of incidents or accidents, and a clear framework for penalties and remedial actions. The legal framework ensures that waste collection, transport, and management are subject to regular oversight by competent authorities, with structured procedures in place to address non-compliance and protect human health and the environment. Additionally, the prohibition of littering and illegal dumping, as well as the requirement for effective, proportionate penalties, are well established.

Monaco transposed the Basel Convention provisions, thereby applying the prior written notification and consent procedures. It is however not clear what requirements are applied to waste not covered by the Basel Convention, such as waste covered by this request.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Monaco has ratified the Basel Convention and 6 multilateral agreements but not the eight ILO conventions. The reason provided for not ratifying these conventions is because of the "administrative burden" of participation as a small country. However, Monaco explained that it complies with these conventions through other international instruments and national law, specifying that the provisions of these conventions are nevertheless protected, as follows:

- Convention No. 105: Monaco is a party to the Council of Europe Convention on Action against Trafficking in Human Beings.
- Convention No. 29 on Forced Labour (1930): Monaco participates in the Council of Europe Convention on Action against Trafficking in Human Beings and the European Convention for the Protection of Human Rights.
- Convention No. 138 on the Minimum Age (1973): Monaco's national legislation aligns with this convention by mandating compulsory schooling until age 16, thereby preventing child employment before this age.
- Convention No. 182 on the Worst Forms of Child Labour (1999): Monaco adheres to multiple binding international instruments that address the worst forms of child labour, including the Council of Europe and UN conventions focused on children's rights and protection.
- Convention No. 111 Concerning Discrimination (1958): Monaco is bound by the European Convention on Human Rights, which prohibits discrimination, while also reserving certain articles to prioritise employment for nationals, clarifying that discrimination based on "national origin" is not applicable.
- Convention No. 100 Concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (1951): Monaco is a party to the Convention on the Elimination of All Forms of Discrimination against Women, which extends beyond the obligations of ILO Convention No. 100 regarding equal remuneration.
- Convention No. 87 on Freedom of Association and Protection of the Right to Organise (1948): Monaco's domestic law supports the freedom to form and join trade unions, in compliance with the provisions of ILO Convention No. 87.
- Convention No. 98 on the Right to Organise and Collective Bargaining (1949): The right to organise collectively and engage in collective bargaining is protected under Monaco's domestic laws, fulfilling the requirements of ILO Convention No. 98.

Monaco complies with the Basel Convention's reporting obligations; it submitted an annual report in 2025. No difficulties or non-compliance issues were observed.

XV.2 Waste-stream specific assessments

The application of Monaco explained the general pollution control measures it takes, including emission limits for heavy metals, dust, dioxins and furans and PCBs, requirements for air pollution control equipment, wastewater management and treatment standards, and authorisation-based controls to reduce environmental risks from waste storage, handling and transfer. Overall, all key pollutants relevant to the treatment of the wastes concerned are covered. Specifically concerning incineration facilities, the Monegasque law will specify the technical requirements for waste reception, combustion conditions, breakdowns, emissions monitoring and the implementation of an environmental management system. The application of Monaco indicated that emission limit values are intended to be aligned with the EU's standards and Best Available

Techniques, expectedly to be published in early 2026. The currently applied emission limit values which are monitored for important parameters, namely HCl, HF, heavy metals, dust, dioxins and furans, SO₂ are systematically 5 to 10 times higher than the higher limit values applied in the EU. In a follow up response received on 13 March 2026, Monaco indicated that the draft regulation concerning incineration installations has been finalized by the competent technical and legal departments. The draft is to be submitted for approval by the Government. Its publication is envisaged before June 2026 and, upon publication, will be transmitted to the European Commission.

Monaco's application provided the information of the single facility that would manage the waste covered by the request. Also, the name and address, permit number, the types of waste concerned by the request that the facility is authorised to recover, and the authorised treatment capacity was provided.

XV.3 Monaco: conclusions

Monaco submitted an application to import wood waste, organic and agro-food waste and textile waste.

As a result of the assessment above, Monaco could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for wood waste, organic and agro-food waste and textile waste.

Annex XVI: Montenegro

Montenegro submitted its application on 26 March 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Montenegro to provide additional information. Montenegro provided such information on 28 October 2025. Following a second request for additional information from the Commission, Montenegro shared additional information on 19 January 2026.

The application submitted by Montenegro covers 2 waste types, eligible under Title IV of the WSR:

- Non-ferrous metal waste: B1010 (specifically aluminium waste)
- Rubber waste: B3140 (waste tyres).

XVI.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Montenegro provided comprehensive and sufficient information on its national waste management strategy and plan.

Montenegro provided annual total waste generation figures for 2022 and 2023. The application specifies that approximately 41% of totally generated waste is suitable for recycling or recovery (metals, glass, plastic, paper, cardboard). The breakdown by main waste categories is provided for municipal waste, industrial waste (including construction and demolition), waste from services/tourism, and other specific streams (e.g., WEEE, batteries, vehicles, medical waste). According to the provided information, the calculation of waste quantities is based on data from the Statistical Office of Montenegro (MONSTAT), the Environmental Protection Agency, and municipal public utility companies. Projections to 2035 utilise the State Waste Management Plan, factoring in GDP growth, seasonal population increases (tourism), planned investments, and policy measures targeting waste reduction and recycling. Overall, the information is sufficiently detailed, with minor gaps in the specific amount of waste requested that is generated by the country.

Montenegro provided a comprehensive estimate of total national waste treatment capacity. It further disaggregates this figure by municipal waste, sorting/recycling centers, specific recycling capacities for metal and rubber (as well as paper/cardboard, plastics, and glass), and industrial waste. The capacities are calculated by aggregating the capacities of landfills, recycling centers, and private operators. In its application Montenegro compared total treatment capacity with the total amount of waste generated, noting that overall capacity is roughly equal to the generated waste, but with pronounced regional differences. It set out a clear projection of increasing capacities, detailing planned infrastructure investments and the expected increases in treatment capacity. Projections are linked to specific developments such as regional centers and modernisation of existing facilities. However, the methodology behind these projections is not fully described.

Montenegro provided an overall separate collection rate for all waste generated. Additionally, it detailed the separately collected quantities for key waste types including metals, paper, plastics, and glass. It highlighted that separate collection rates are based on systems established under the Waste Management Law and the State Waste Management Plan. While the mechanisms and organisational structure are clearly described, the application lacks detail on how quantities are measured, sampled, or verified. Clear policy objectives are provided, such as increasing the separate collection rate to 25% by 2029 and 40% by 2035. It specifies concrete measures, including expanding selective-collection infrastructure and full rollout of EPR systems. The objectives are measurable, time-bound, and supported by targeted actions, reflecting a robust strategic approach.

Montenegro provided an estimate of the total quantities of waste that are landfilled. The application references data sources and provided overall waste landfilling rates, but it did not describe the methodology used to calculate the specific proportions for each waste category. The response outlined measurable and time-bound objectives for reducing the proportion of landfilled waste. It identified concrete measures such as nationwide expansion of separate collection, introduction of EPR and deposit-refund systems, development of recycling infrastructure, and the construction of regional waste management centers.

Montenegro provided separate recycling quantities for the main waste categories in 2023. The text describes that data on the total quantities of waste recycled in Montenegro are calculated based on annual waste-management reports submitted by all entities engaged in collection, transport, storage, treatment, recovery or disposal of waste. The collection, processing and verification of these data are carried out through the national waste database, managed by the Environmental Protection Agency, in accordance with the Waste Management Law and the relevant reporting regulations. The application provided quantified, time-bound targets for overall and category-specific recycling rates up to 2035, including metal (from 75% to 90%), paper/cardboard (55% to 80%), plastic (25% to 55%), and glass (40% to 70%). As highlighted above, it provided a comprehensive set of implemented and planned measures.

Montenegro provided data on the quantities of non-hazardous waste imported into its territory, including specific breakdowns by waste type. The submission describes the calculation methodology. The application provided substantial evidence of measures ensuring environmentally sound management and the protection of domestic waste management (although not mentioning how waste imported into the applicant country's territory will be managed in accordance with environmental protection standards similar to those found in the EU). EPA's verification of available capacity prior to each import authorisation, the zero import capacity for plastics, and the quarterly reporting and adjustment mechanism further substantiate that imports do not adversely impact domestic waste management.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Montenegro's application is excellent regarding the information provided on permitting, licensing or registration systems for transport of waste, as it clearly indicates that any establishment intending to carry waste must be registered with the competent authority and that a register is maintained and can be provided. In particular, Montenegro indicated that its Waste Management Law requires that establishments intending to carry waste must

receive a permit from the Environmental Protection Agency in Montenegro, and that such permits are recorded in a register. The permit documentation for each establishment intending to carry waste must specify the types of waste to be transported but not the quantity.

Montenegro provided a comprehensive list of environmental legislation that includes legal provisions addressing the protection of air, water, and soil. Regarding air pollution, Montenegro's submission demonstrates that it has implemented domestic legislation to address air pollution from waste management operations, referencing both structural and technical controls. The text describes the use of Best Available Techniques (BATs) and monitoring requirements, and includes technical measures for pollution prevention, such as gas capture and treatment, and on-site incident prevention and response plans. Regarding water pollution, Montenegro provided good detail on water pollution controls for waste management operations. Regarding soil pollution Montenegro's legal framework includes measures to prevent soil pollution from waste management operations, such as requirements for impermeable storage surfaces, secondary containment, and prohibition of landfilling certain residuals.

Montenegro's application provided comprehensive evidence that it implements domestic legislation governing the import and export of waste. In particular, the country's legal framework, as set out in the Waste Management Law and associated by-laws, implements controls equivalent to the Prior Informed Consent (PIC) provisions of the Basel Convention and the information requirements of Article 18 of the Waste Shipment Regulation. Evidence includes requirements for shipment-specific permits, detailed record-keeping, manifest systems, and EPA oversight—demonstrating both specific and general legislative coverage for the waste streams in question. The explicit prohibition on hazardous waste imports and the detailed procedures for non-hazardous waste (including aluminium and plastics) confirm full alignment with international standards. The regime's practical measures (e.g., manifests, inspections, annual caps) ensure enforceability and traceability.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Montenegro's application provided a complete overview of the legislative measures in place for inspections and penalties, and evidence of their practical implementation. In particular, the country has established a robust legislative framework to ensure effective waste management oversight, supported by the Waste Management Law and the Law on Inspection Supervision.

Concerning inspections, Montenegro's application indicated that customs and environmental inspections are carried out both at border crossings and at the receiving facilities. Importers and operators must keep detailed records and report annually on quantities, types, destinations and treatment outcomes. Short inspection checklists will be used at the border and at facilities to confirm the declared recovery purpose, verify the correspondence of waste type and quantity with the permit, and assess basic storage and cleanliness conditions. Photographic documentation will be taken only where necessary. Targeted sampling will be applied solely to higher-risk shipments.

In terms of penalties, the country can impose administrative measures, initiate misdemeanour proceedings, and file criminal charges as appropriate. The legislation also

clearly defines a range of penalties, from administrative sanctions to criminal prosecution, with fines ranging from EUR 150 to EUR 40,000, depending on the severity of the violation and potential environmental harm.

The implementation of these laws is demonstrated by statistical data and specific case examples from 2022–2023. Over 2,000 inspections were conducted in the waste management sector, resulting in 340 enforcement actions, 146 misdemeanour complaints, and 18 criminal charges. Notable cases include fines for improper waste disposal, unlicensed operations, and hazardous waste mismanagement, with penalties imposed on both companies and individuals. These examples, along with the reported value of fines and the initiation of criminal proceedings, provide clear evidence of active enforcement and the application of penalties, meeting the criteria for both legislative presence and practical implementation of inspections and sanctions in Montenegro.

Montenegro's application demonstrated to have established a comprehensive and robust legislative and enforcement framework for waste management. This framework is primarily built upon the Waste Management Law and the Law on Inspection Supervision, both of which lay the foundation for systematic oversight, inspection, and the imposition of penalties where necessary. Montenegro demonstrated equivalence with EU benchmarks regarding enforcement, inspection, and penalties.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Montenegro has ratified the Basel Convention, and all the 13 other multilateral agreements. Montenegro complies with the reporting obligations and other obligations of the Basel Convention. However, additional desk research revealed that Montenegro does not seem to comply or complies partially with the reporting obligations of the Stockholm Convention on Persistent Organic Pollutants, as no reports appear to be submitted on the official website, and the Paris Agreement, as Montenegro submitted the Biennial Transparency Report, but not a complete National Inventory Report. The compliance with remaining obligations was checked and no other issues were observed.

XVI.2 Waste-stream specific assessments

For both metal waste (aluminium) and rubber waste (waste pneumatic tyres), Montenegro provided an estimate of national waste treatment capacity, an estimate of the total quantities of this waste stream that are landfilled and separate recycling quantities for the main waste categories in 2023. However, it did not provide the total waste concerned by the request generated on an annual basis, and 10-year projections for the waste concerned by the request. The breakdown by main waste categories is provided for municipal waste, industrial waste (including construction and demolition), waste from services/tourism, and other specific streams (e.g., WEEE, batteries, vehicles, medical waste). Montenegro should provide more information on the projected treatment capacity for the next 10 years for the waste concerned by the request.

Montenegro's application adequately demonstrated equivalence with EU benchmarks regarding permitting for waste treatment facilities. Montenegro's waste management law and permitting system require that all permitted facilities include detailed conditions on

emission limits, pollution control, methods to monitoring the environmental impact of processing or disposal processes, safety plans. Permits for waste treatment and recovery facilities are subject to periodic review and renewal, as required by national law. The competent authorities regularly reassess permit conditions every 5 years, and a permit may be extended only once. Montenegro's legal framework mandates that permits for waste management facilities must include measures to be implemented during emergency operational conditions including plant shutdown, malfunctions and decommissioning and repurposing. The permitting regime for landfills requires specification of landfill class, types and quantities of waste accepted, operational procedures, and closure requirements. These elements are included in the permits for Montenegro's sanitary landfills, ensuring full compliance with this obligation. Permits for all waste treatment facilities must specify the types and quantities of waste processed, treatment processes, technical and operational requirements, and measures for environmental protection and monitoring. However, detailed provisions on technical competence of operators, financial security (such as guarantees or insurance), and mandatory pre-operation inspections are not fully elaborated in the application.

Montenegro also clearly presented in its application the measures in place to manage residual waste from waste treatment in an environmentally sound manner. Montenegro's landfill management framework requires that waste destined for landfill undergoes defined acceptance criteria. Landfill operators must document and characterize all waste prior to acceptance, under regulatory oversight, and conduct regular operational monitoring and periodic compliance testing, including annual tests by independent qualified laboratories using EN/ISO methods. Additionally, procedures for landfill closure and after-care are referenced, ensuring continued compliance and environmental protection. Montenegro's application indicated that installations, particularly those handling waste tyres, are operated with preventive measures against pollution and accidents. Facilities are required to implement best available techniques (BAT), including filtration, containment, fire prevention, and environmental monitoring. Efficient use of energy, materials, and water is mandated, with operators optimizing processes and resource consumption as part of their permit conditions. Montenegro's legal framework requires that permits for waste management installations include emission limit values for key pollutants (dust, NO_x, SO₂, CO, HCl, HF, TOC), requirements for soil and groundwater protection, monitoring obligations, information supply to authorities, regular maintenance, surveillance, and measures for abnormal operating conditions. Compliance assessment procedures are described, and facilities must maintain traceability and reporting.

Montenegro's application provided evidence that the country has pollution controls in place when treating the waste concerned by the request. Montenegro indicated that the waste management framework addresses wastewater treatment by requiring BAT-based processes such as settlement, filtration, and oil separation, monitoring relevant parameters. The country ensures environmental risk reduction in waste storage through measures like segregated storage, impermeable surfaces, secondary containment, dust suppression, fire protection, and strict traceability. Similar comprehensive controls are in place for safe handling and transfer of waste.

In addition, the country clarified the emission limit values that are monitored for important pollutants in the treatment of metal waste. In particular, Montenegro indicated the emission limits for total suspended solids (TSS), total organic carbon (TOC), chemical oxygen demand (COD), dust, hydrogen chloride (HCl), and hydrogen fluoride (HF), total volatile organic compounds (TVOC), nitrogen oxides (NO_x), and sulfur dioxide (SO₂). Montenegro indicated that pollutants such as dioxins/furans are not characteristic for

retreading processes for tyres and are therefore not set in the permit for these facilities. Montenegro's application further explained that emission limit values are introduced on a case-by-case basis through local permits, taking into account the applied technology, scale of operations and environmental risk profile. In such cases, permit conditions typically address emissions of dust, volatile organic compounds and odor-related substances, as well as emissions to water where applicable.

Montenegro's application provided the details on the only facility that is authorised for final recovery operations of waste tyres, together with its authorised treatment capacities. Addresses are not provided but can be retrieved from the websites of the facility, provided by Montenegro. The country did not provide permit numbers.

Specifically regarding waste tyres, a 2022 academic paper states that a 'significant number' of waste tyres are disposed in illegal and unregulated landfills in the vicinity of Podgorica, and that some tyres are placed in containers with mixed municipal waste. ⁽¹⁶⁾ It also reports that some authorised waste tyres collectors (verified by the Environment Protection Agency) have not transported tyres to a legal landfill. An important point of attention remains the limited formal treatment capacity in Montenegro and the need to address illegal disposal and burning.

XVI.3 Montenegro: conclusions

Montenegro submitted an application to import aluminium waste and waste pneumatic tyres.

As a result of this assessment, Montenegro

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for waste pneumatic tyres and aluminium waste.

In addition, the Commission services emphasise the need for the authorities from Montenegro to provide additional information to confirm that the environmental sound management of waste tyres imported from the Union is ensured in the country. The Commission intends to reevaluate the inclusion of Montenegro into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

⁽¹⁶⁾ [Ćetković, J. \(2022\) Environmental Benefits of Air Emission Reduction in the Waste Tire Management Practice](#)

Annex XVII: Morocco

Morocco submitted its application on 21 March 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Morocco to provide additional information. Morocco provided more information on 29 November 2025, 19 January 2026 and 3 April 2026.

The application of Morocco referred to several waste codes that concern hazardous waste:

- A1100: Dusts and residues from gas cleaning systems of copper smelters.
- A1110: Spent electrolytic solutions from copper electrorefining and electrowinning operations.
- A1120: Waste sludges, excluding anode slimes, from electrolyte purification systems in copper electrorefining and electrowinning operations.
- A1130: Spent etching solutions containing dissolved copper.
- A1140: Waste cupric chloride and copper cyanide catalysts.

Pursuant to Article 4A of the Basel Convention as implemented through Article 39(1) of the EU Waste Shipment Regulation, the export of hazardous waste is prohibited from the EU to non-OECD countries, thus such waste were not considered when assessing the application of Morocco.

The application of Morocco also referred to plastic waste under Basel entry B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Morocco.

The application submitted by Morocco covers 4 groups of eligible types of waste, namely

- Ferrous metal waste: B1010 (specified by the following EU List of waste codes: 170401, 170402, 170403, 170404, 170405, 170406, 170407, 170411);
- Non-ferrous metal waste: B1010 (specified by the following EU List of waste codes: 170401, 170402, 170403, 170404, 170405, 170406, 170407, 170411), B1100 (specified by the following EU List of waste codes: 100804, 100809, 100811, 100813, 100814, 100816, 100818, 100820, 100899, 101003, 101006, 101008, 101010, 101012, 101014, 101016, 101099) and B2110 (waste under EU List of waste code 100305).
- Rubber waste under EU List of waste code 160103 (waste pneumatic tyres (B3140));
- Textile waste (B3030 and B3090);

XVII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Morocco provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application of Morocco provided data regarding the annual quantity of total waste generated in the country as well as figures for the waste types covered by its request. The application however provided only a limited outlook on how the generation is going to develop in the following 10 years.

The application of Morocco indicated that an overall treatment capacity is available in the country for 66.6% of the household waste generated domestically, whereas only 12% of industrial waste is treated in Morocco. The application mentioned that an estimated 33.4% of municipal solid waste is currently littered. While a set of measures designed to reduce this rate are outlined in the application, it is not clear from the application how and where waste is managed for which capacity is lacking. Ensuring sufficient capacity for waste management is a point of attention.

The application of Morocco supplied estimated landfill proportions for key waste streams covered by their request. Morocco also presented a comprehensive set of measures intended to reduce these rates, including introducing selective sorting, recovery platforms, landfill restrictions, a waste-treatment hierarchy, and the application of extended producer responsibility. Additional initiatives, such as regional master plans, municipal support for selective collection, a dematerialised authorisation system for non-hazardous waste, and the development of recovery sectors, are mentioned. At the same time, Morocco established clear national targets for increasing recycling and recovery, aiming for an overall 20% rate by 2030 and 25% by 2035, reflecting alignment with the updated National Sustainable Development Strategy. However, no quantitative data were supplied on the current proportion of domestic waste that is separately collected, nor on the separate collection rates for key waste streams.

The application of Morocco did specify recycling targets for key waste streams, including objectives of 80% for shredded tyres and metals, 70% for plastics by 2030, and 50% for textiles by 2035. To reach these goals, Morocco informed about measures to achieve this, such as introducing extended producer responsibility, and establish an authorisation system for the collection, transport, recovery, and disposal of non-hazardous waste. Further actions include regional master plans for non-hazardous waste management, support for the development of sorting and recovery centres at controlled landfills, municipal assistance for selective collection, and continued organisation of recovery sectors. Morocco reported on a considerable share of the waste being littered, but pointed to a set of measures to remediate this in the short term.

Morocco provided in its application data on the overall quantity of imported waste into the country, as well as on the legal framework to regulate such imports. According to Morocco, waste imports have a negligible impact on domestic waste management, as they are only permitted when national supply cannot meet industrial demand.

The explanation of the methodology to generate figures, provided in the application by Morocco, is robust, outlining a structured system based on data collected from public and private stakeholders, validated by a joint committee, with hazardous waste figures derived from mandatory weighing and municipal data used for non-hazardous waste.

Overall, the application of Morocco regarding its national waste management strategy can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

In Morocco, currently no permit or registration obligation exist for collection, transport, or treatment of non-hazardous waste, and it is not clear whether such a framework will be established in the near future. For hazardous waste, Moroccan law already requires authorisation for collection and transport, subject to conditions on financial capacity, qualified personnel, safety measures, and appropriate equipment. Morocco also explained that transboundary movements are subject to national and international requirements.

Morocco's environmental framework provides comprehensive protection of air, soil, and water through a series of complementary laws and regulations. Air quality is safeguarded by Law 13-03, which prohibits the emission or release of pollutants beyond authorised limits and imposes fees when discharges exceed general standards, while the development of implementing decrees ensures effective control. Soil and land protection is embedded in several instruments, including Law 28-00 and the forthcoming Law 48-23, which promote waste reduction at source, selective collection, recovery techniques, and extended producer responsibility, as well as proper management of hazardous waste to prevent pollution from landfills. Water resources are protected under Law 36-15, establishing rules for integrated and sustainable water management, prevention of water-related risks, and pollution control. Together, these measures, complemented by constitutional recognition of the right to a healthy environment, provide a structured approach to preventing environmental degradation and safeguarding public and ecological health.

Overall, the application of Morocco regarding its waste management and environmental legal framework can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

In its application, Morocco provided comprehensive information on its enforcement and inspection framework. Moroccan law empowers competent authorities and the Environmental Police to carry out periodic and unannounced inspections of waste management activities, including collection, transport, and facilities, with flexibility to determine frequency per site. The legal framework prohibits illegal dumping and littering, establishes a graduated system of penalties, and allows suspension of operations in cases of non-compliance or environmental risk. Moroccan law also ensures monitoring of emissions, expert intervention during incidents, and systematic control of waste origins, quantities, and destinations, demonstrating a structured approach to enforcing compliance and protecting environmental and public health.

The Moroccan policy framework sets out detailed inspection planning procedures for waste management facilities. The application of Morocco reported inspections conducted in 2024, covering seven hazardous waste treatment facilities, four additional hazardous facilities, and various non-hazardous waste facilities and landfills. The legislation also specifies penalties, including fines and imprisonment. However, the application of Morocco did not provide evidence of spot checks on shipments or recovery operations, nor practical examples or quantitative data on penalties actually applied.

The import of hazardous waste to Morocco is banned. Non-hazardous waste may be imported for recycling or recovery only with prior authorisation, while all exports require authorisation and the written consent of the receiving state. Transboundary movements must be covered by insurance or financial guarantees, and importers are required to report on monitoring and follow-up, including air quality, for waste destined for energy co-incineration or industrial recovery.

Overall, the application of Morocco regarding its implementation and enforcement of relevant rules can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Morocco has ratified the Basel Convention. The country complies with the reporting obligations of the Basel Convention and the latest submitted report dates from 2025 for the reporting year 2023. No issues were observed regarding compliance with other obligations under the Convention.

Morocco further indicated that it has ratified ten of the remaining 13 multilateral agreements listed in Annex VIII of the WSR. The substance of these multilateral agreements has been integrated into domestic legislation and policies.

Concerning the ILO Conventions that Morocco has ratified, all reports have been regularly submitted.

Of the remaining multilateral agreements that Morocco has not ratified, the Minamata Convention on Mercury has been signed and the ratification is currently under preparation.

However, Morocco did not provide any information on whether it intends to ratify the ILO Conventions on Freedom of Association and Minimum Age, nor whether it is implementing their provisions despite non-ratification.

Overall, Morocco largely fulfils its relevant international commitments, but the non-ratification of two ILO conventions remains a point of attention.

XVII.2 Waste-stream specific assessments

Ferrous metal waste and non-ferrous metal waste

The information provided regarding the current and expected generation and capacity to treat the wastes concerned by the request can be assessed as acceptable.

For the eligible types of waste covered by the request of Morocco, other than paper and packaging waste, the overview provided of Morocco's legal framework for permitting and pollution control in the waste management sector includes preventive measures against pollution and accidents, efficient resource use, and requirements to operate under permits that define emission limits, monitoring, reporting, maintenance, and emergency obligations, can be assessed as sufficiently demonstrating equivalence.

Morocco explained in its application the general pollution control measures in place in its territory. Their legal framework refers to energy audits and energy management requirements, measures to reduce air emissions through dust removal and filtration systems, optimisation of water consumption, and multi-stage wastewater treatment. Morocco also indicated controls on scrap quality to limit contamination and improve recovery, as well as measures and monitoring obligations aimed at preventing and reducing diffuse dust emissions during storage, handling, and transport.

However, Morocco's application is not sufficient regarding the description of requirements to ensure a stable shredder feed for optimised energy use, nor does it set out specific rules to reduce environmental risks linked to waste storage, handling, and transfer, such as segregation, spill prevention, or capacity and safety conditions. Finally, although Morocco did not provide all the quantitative limits for the key pollutants related to the treatment of ferrous metal waste.

The application of Morocco provided a list of facilities. Details for 4 facilities were indicated to treat ferrous and non-ferrous metal and mineral waste, 3 facilities were specified for treating textile waste. Permit numbers and treatment capacities were however not provided, which remains a point of attention.

Textile waste

The information provided regarding the current and expected generation and capacity to treat the wastes concerned by the request can be assessed as acceptable.

For the eligible types of waste covered by the request of Morocco, other than paper and packaging waste, the legal framework for permitting and pollution control in the waste management sector includes preventive measures against pollution and accidents, efficient resource use, and requirements to operate under permits that define emission limits, monitoring, reporting, maintenance, and emergency obligations. These elements can be assessed as sufficiently demonstrating equivalence, especially for textile and mineral waste.

Morocco explained in its application the general pollution control measures in place in its territory. Their legal framework refers to energy audits and energy management requirements, measures to reduce air emissions through dust removal and filtration systems, optimisation of water consumption, and multi-stage wastewater treatment. Further information should be provided on quality control to limit contamination and improve recovery, as well as on measures and monitoring obligations aimed at preventing and reducing diffuse dust emissions during storage, handling, and transport. In particular, Morocco did not describe requirements to reduce environmental risks linked to waste storage, handling, and transfer, such as segregation, spill prevention, or capacity and safety conditions.

The application of Morocco provided a list of facilities. Details for 3 facilities were specified for treating textile waste. Permit numbers and treatment capacities were however not provided, which remains a point of attention.

Overall, the application of Morocco has provided sufficient insight in its policy and measures taken to specifically manage textile and mineral waste in an environmentally sound manner.

Waste tyres

The management of this type of waste in Morocco primarily involves recycling and treatment in cement kilns.

The legal framework establishes preventive measures against pollution and accidents, comprehensive permit requirements for waste treatment and co-incineration facilities, landfill waste acceptance criteria, operator obligations to accept only authorised waste, and bans on landfilling separately collected waste intended for recovery. It also includes controls on waste dilution, operational monitoring, closure and after-care of landfills, mandatory waste characterisation and testing, annual compliance monitoring, use of independent laboratories, and measures to reduce dust and air emissions from dusty operations. The application also described energy-efficiency planning and auditing obligations, robust controls on air emissions through filtration and abatement systems, and a regulatory framework aimed at reducing dust, particulate-bound metals and combustion-related pollutants. The application provided sector-specific requirements governing the use of waste in kilns, including operating conditions and dust-control measures for both kiln and non-kiln dusty operations.

However, the application of Morocco did not demonstrate specific limit values for certain co-disposed wastes, or technical regulations governing the use of waste in kilns. It also did not sufficiently address environmental risk-reduction measures for the storage, handling and transfer of waste, as it lacks explicit requirements on safe storage conditions, segregation, spill prevention and operational procedures. In addition, it does not clearly demonstrate controls on substances entering kilns, nor does it establish explicit obligations to reduce or stop operations in the event of breakdowns.

Finally, the application of Morocco did not provide the quantitative limits for the key pollutants related to the treatment of residues from shredded tyres.

In summary, while a part of waste tyres are being processed through recycling or in cement kilns, it remains unclear whether capacity is sufficient to rule out that imported tyres are diverted to landfills or dumping sites.

XVII.3 Morocco: conclusions

Morocco submitted an application to import ferrous metal waste, non-ferrous metal waste, rubber waste, textile waste and mineral waste.

As a result of this assessment, Morocco

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for textile waste, mineral waste and waste pneumatic tyres;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Morocco to provide additional information on (i) the implementation of measures to improve separate waste collection, reduce landfilling and increase recycling capacity, as well as on (ii) permit or registration obligations for the collection, transport, or treatment of non-hazardous waste, (iii) enforcement of the rules and (iv) ratification of international Conventions mentioned in the WSR. Although used tyres are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of waste tyres imported from the Union is ensured in the country.

Annex XVIII: Nigeria

Nigeria submitted its application on 27 January 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Nigeria to provide additional information. Nigeria provided such information on 28 November 2025. Following a second request for additional information from the Commission, Nigeria shared additional information on 12 January 2026.

The application submitted by Nigeria covers two types of waste, eligible under Title IV of the WSR:

- Textile waste: specified under EU list of waste codes: 200111 and 150203;
- Refuse-derived fuel (RDF): specified under EU list of waste codes: 191210 (combustible waste – refuse-derived fuel), but also 190104 (Fluff-light fraction and dust) and 191212 (Other wastes, including mixtures of materials, from mechanical treatment of wastes).

XVIII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of Nigeria provided satisfactory information on its national waste management strategy and plan.

The application of Nigeria provided the overall quantity of waste generated in the country (i.e., average of 32 million metric tons generated annually), as well as the 10-year projections of this quantity, which is expected to increase by 10% in the next 10 years; however, the reasoning behind this percentage was not provided. No specific methodology on the quantities provided under this point were provided.

The application of Nigeria provided the treatment capacity for waste in general, as well as the treatment capacity for the waste concerned by the request. However, the treatment capacity (for both waste in general and the waste concerned by the request) is lower than the amount of domestic waste generated annually. Moreover, no additional information on 10-years projections was provided. No specific methodology was provided on how the data were collected and validated.

The application of Nigeria did not provide the overall proportion of domestic waste that is separately collected. As for possible objectives and measures, Nigeria stated measures such as creating separate waste bins for collection, but also admitted that implementation is a challenge because wastes still arrive co-mixed at dumpsites.

The application of Nigeria indicated that none of the waste concerned by the request goes to landfills. According to Nigerian authorities, such waste is taken to dumpsites where it is sorted and then sold or taken to the recyclers for recycling, refurbishing or re-use in an environmentally sound manner. It also stated that, as of now, 500.000 Mt of waste goes to landfills, be it that this does not cover wastes concerned by the request. However, the

application of Nigeria did not provide any sufficient information on how the country plans to decrease the rate of landfilled waste in general. It was not explained how the quantities provided under this point were calculated.

The application stated that 90% of the waste concerned by the request is recycled. However, this claim was not supported by tangible evidence. As for possible objectives and measures to increase the rate of recycled waste in the future, Nigerian authorities mentioned effective collection and importation through monitoring and issuance of permit to both importers/exporters.

The application of Nigeria stated that waste is not littered anymore and that littering has been prevented through policies, regulations, monitoring & enforcement. It also stated that dumpsites serve as a collection centre for all waste, and scavengers sort the waste and sale to recyclers. Neither a specific methodology was provided on how the data were collected and validated, nor any other additional information on the ambitious statement that waste is not littered at all.

The application provided insufficient information on Nigeria's strategy to ensure the environmentally sound management of the imported waste, as well as information on the possible impacts of imported waste on domestically generated waste. In particular, Nigeria stated that imported waste is controlled through the Prior Informed Consent (PIC) procedure, and that waste cannot enter if Nigeria is not able to meet ESM standards. It is however not clear what such standard entail.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Nigeria's application explained the permitting, licensing or registration system for the transport of waste. The application stated that waste transport operators are required to obtain licenses, permits or registration from relevant ministries, departments, and agencies (MDAs), and that such procedure applies to all waste. Hence, the application of Nigeria confirmed that any establishment intending to carry waste on a professional basis must be registered with the competent authority. However, it did not demonstrate that it maintains and can provide a comprehensive register covering all establishments carrying/transporting waste.

The application of Nigeria provided an adequate description of domestic legislation relevant to the protection of the environment and human health in the context of waste management operations, as it provided relevant explanation of the National Policy on the Environment focusing on the protection of the air and the atmosphere, of fresh water and wet-land ecosystems, coastal and marine ecosystems, as well as policies on waste management in order to protect the soil.

The application insufficiently demonstrates that the country has implemented domestic legislation governing the import and export of the waste types covered by the request. The application refers to an extract from the National Policy on Waste Battery Management indicating that imports and exports of waste batteries are subject to the prior informed consent (PIC) procedure. Although the application of Nigeria stated that this approach may apply to all waste streams concerned by the request, the information provided did not explain how the PIC procedure is implemented in practice.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application insufficiently demonstrated a strategy for enforcement of domestic legislation on waste management and waste shipment. The application of Nigeria referred to two pieces of legislation related to inspections but does not provide any information on their content or scope. On the implementation of inspections, the application of Nigeria reported that approximately 20 inspections are carried out annually, but no details are given on how inspections are conducted, which activities or facilities are covered, or the criteria applied. In addition, no legislation on penalties is presented. The application of Nigeria listed possible sanctions, such as fines, imprisonment, facility closure, and prosecution, without providing further information on their application or evidence of implementation.

The application of Nigeria presented a structured environmental inspection framework under the National Environmental (Battery Control) Regulations, which focuses on enforcement actions linked to the identification of offences and the application of penalties. However, more information should be provided to elaborate on whether the regulatory framework provides in-dept environmental inspections, periodic or non-routine inspections of facilities and transport operators, and requirements for monitoring emissions or recording data for compliance verification. In addition, there are no provisions addressing the prohibition of littering, the adoption of measures in case of incidents or accidents with environmental or health impacts, or the suspension of operations in the event of serious breaches of regulatory obligations.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Nigeria has ratified the Basel Convention. The application provided evidence that the country complies with the reporting obligations of the Basel Convention. Nigeria submitted on 19 April 2025 its 2023 national report. Nigeria further indicated that it has ratified five multilateral agreements, namely: Stockholm Convention on Persistent Organic Pollutants, Minamata Convention of Mercury, UN Framework Convention on Climate Change, Paris Agreement, and Montreal Protocol. No issues concerning the implementation of other obligations of these Conventions were identified.

Nigeria ratified all eight ILO Conventions and reported to these Conventions in 2025. As for the other four ILO Conventions, Nigeria did not submit its national report in 2024.

XVIII.2 Waste-stream specific assessments

Concerning its description of the national waste management strategy on textile waste, Nigeria's application is adequate. It provided an estimate of the annual quantity of textile waste generated, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years. For textile waste, the application of Nigeria also provided an estimate of the country's treatment capacity, showing that it does not cover the amount of textile waste generated in the country. The application of Nigeria also provided the proportion of domestic textile waste that is recycled.

Specifically regarding refuse-derived fuel (RDF), the description of the national waste strategy or plan is insufficient. Although it provides an estimate of the annual quantity of RDF waste generated in the country and the proportion of domestic waste that is landfilled, it does not provide the country's treatment capacity for RDF waste. In fact, the application of Nigeria stated that RDF treatment is "very low", as the country does not have any facilities converting waste into RDF.

The application of Nigeria identified two facilities and indicated the types of waste treated at each site, but no information on specific treatment processes was provided. It also submitted the text of three legislative instruments, namely the National Policy on the Environment, the Policy Guidelines on Solid Waste Management, and the National Environmental (Battery Control) Regulations. However, the information provided does not include the technical details required, such as the specific treatment processes applied to textile waste or RDF or the technical requirements in place to ensure that installations operate in an environmentally sound manner. The material largely outlines general operational rules, for example on storage and transport, rather than technical standards for environmentally sound waste management.

The application of Nigeria stated that RECP guidelines and programs set out provisions for the treatment of residual waste; however, no information on such provisions was provided. Moreover, Nigeria provided information on the Harmful Waste (Special Criminal provisions) Act, stating that any person found guilty of a crime will be imprisoned for life. However, no other information was provided. Concerning key pollutants of the treatment of textile waste and RDF residues, the application of Nigeria provided the National Environmental (Battery Control) Regulations, which contains emission limits. However, not all of them were mentioned.

The application of Nigeria stated that regulations (without specifying which ones) indicate that minimum emission standards apply to waste treatment facilities, and that routine monitoring and a licensing system are in place to ensure the use of pollution abatement techniques, with permits renewed every two years. However, no further details are provided on the applicable emission limits, monitoring procedures, or specific technologies required for each of the waste concerned by the request, which makes the information insufficient for assessment. Again, concerning key pollutants of the treatment of textile waste or RDF, Nigeria provided the National Environmental (Battery Control) Regulations, which contains emission limits. However, not all of them were mentioned.

It is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

XVIII.3 Nigeria: conclusions

Nigeria submitted an application to import textile waste and refuse-derived fuels (RDF).

As a result of the assessment above, Nigeria could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-

hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

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Annex XIX: North Macedonia

North Macedonia submitted its application on 19 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited North Macedonia to provide additional information. North Macedonia provided more information on 16 October 2025 and 13 February 2026.

The application submitted by North Macedonia covers 5 groups of eligible types of waste, namely

- Ferrous metal waste (classified under EU List of Waste codes 120101, 120102, 160117, 191001, 191202 and 200140);
- Non-ferrous metal waste (classified under EU List of Waste codes 170402, 170403, 170404, 170406, 150104, 200140, 191002 and 191203);
- Paper waste (B3020 (classified under EU List of Waste codes 150101 and 191201);
- Organic and agro-food waste (classified under EU List of Waste code 200125);
- Glass waste (classified under EU List of Waste code 200102)

For the purpose of establishing the list of countries in accordance to Article 41 of the Waste Shipment Regulation, the following corresponding Basel Convention entries are identified:

- Ferrous metal waste: B1010 and B1230;
- Non-ferrous metal waste: B1010, B1020, B1050, B1080 and B1100;
- Paper waste: B3020;
- Organic and agro-food waste (B3065) and
- Glass waste: B2020.

XIX.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of North Macedonia provided the annual quantity of total waste generated in the country (approximately 1.4 million tonnes in 2022 of which around 70% was non-hazardous). No clear projections for the next decade were provided.

Neither the application nor the additional information provided in February, provided data on the overall current or future treatment capacity for waste in North Macedonia. Only data for the treatment capacity of the waste concerned by the request were provided.

The application did not provide the overall proportion of separately collected waste, and also not for the waste concerned by the request. It only provided data for waste batteries, e-waste and packaging waste.

The application of North Macedonia indicated that it is not possible to provide accurate data on the proportion of waste covered by the request that is landfilled in North Macedonia but did indicate possible objectives and measures to decrease the rate of landfilled waste, including the application of Extended Producer Responsibility (EPR) schemes to the waste concerned by the request. The focus is on transitioning from illegal landfills to licensed

standard facilities, with emphasis on high recycling and treatment rates. Goals for reducing landfilling of biodegradable components are regulated under the National Waste Management Plan 2021–2031.

The application also presented several objectives and measures to increase the rate of recycled waste. These include infrastructure development for waste selection at the source and organised recycling systems, educational campaigns and awareness-raising initiatives, and programs in schools and public areas to promote proper waste sorting. Measures also cover improvement of separate collection systems for paper, plastics, glass, and metals. In addition, the country plans investments in recycling capacities and the preparation of regional waste management systems financed through international and national funds. Legal and regulatory measures are also envisaged to encourage compliance, promote recycling among businesses, and harmonise practices with EU legislation.

The application provided a comprehensive list of import authorisations for 2024, containing the state of import, the expiration date, the codes of waste imported, and the permitted quantities (in tonnes). It was further explained that data in this list table are based on import permits issued.

Concerning the strategy to ensure the environmentally sound management of imported waste, North Macedonia's application outlined strengthened regulations for imports of non-hazardous waste and waste mixtures, ensuring that hazardous waste remains subject to the Basel Convention. Measures include rigorous inspections and sanctions to prevent illegal imports, with high fines and potential withdrawal of licences for violators. Also the development of infrastructure and specialised recycling and processing centres, primarily for domestically generated waste, was highlighted.

Overall, the application of North Macedonia provided an acceptable insight in the state of play regarding its waste generation and management, as well as its waste policy strategy.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

North Macedonia requires waste transporters to be permitted, and a register of waste transport companies is maintained by the authorities.

The application contained a description of the permitting framework for waste treatment activities, including requirements that permits specify technical conditions, authorised types and quantities of waste, safety and preventive measures, monitoring obligations, financial guarantees, and conditions ensuring care after closure or cessation of operations. The application also indicated that emission limits are set through permits and that emissions must be monitored as part of authorised waste management activities.

However, and notably related to residual waste management, it was neither indicated whether permits are subject to periodic reconsideration or revision, nor whether landfill permits are issued only after verification of all technical, managerial, financial and inspection prerequisites. In addition, no information was provided on whether landfill permits include detailed content such as landfill classification, authorised disposal capacity, contingency or intervention plans.

The application of North Macedonia presented an overview of its legislative framework addressing air, water, and soil pollution, demonstrating overall alignment with key EU environmental benchmarks. The application referred to the Law on Ambient Air Quality, which regulates emissions from waste treatment processes such as incineration and landfilling, sets emission standards for major pollutants (PM, NO_x, CO₂, SO₂), and mandates regular monitoring. For water protection, the Law on Waters is cited, which establishes obligations for wastewater treatment and discharge limits, and includes preventive measures against contamination by hazardous substances. Finally, soil protection is addressed through the Law on the Environment and waste-specific legislation, which set liability mechanisms for environmental damage and ensure safe handling of waste streams such as batteries, oils, and chemicals.

The application provided a detailed description of the domestic legal framework governing the import and export of the waste concerned by the request, which is aligned with the Basel Convention. The framework reflects the core elements of the Prior Informed Consent procedure for transboundary waste movements.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of North Macedonia demonstrated a structured and multi-level environmental inspection system, with clearly assigned responsibilities across state and municipal inspectorates, regular and non-routine inspections of waste management activities, and controls covering waste collection, transport, origin, quantity and destination. The framework also includes emission monitoring obligations linked to environmental permits and a system of penalties that are proportionate and dissuasive, including significant fines and criminal sanctions for serious offences such as illegal dumping. However, no information was provided on how penalties are actually implemented. Also, the application did not indicate that monitoring frequencies are explicitly set by the competent authority, nor does it describe specific measures to be applied in the event of environmental or health-related incidents. It also does not clarify whether operations can be suspended immediately in cases of serious permit breaches posing imminent risks.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

North Macedonia has ratified the Basel Convention and complies with the reporting obligations under that Convention. No other issues with implementation were detected.

The application of North Macedonia provided detailed explanations of how all multilateral agreements have been integrated into domestic legislation and government's actions. It further explains that national reports regarding multilateral agreements are regularly submitted.

Overall, North Macedonia fulfils its relevant international commitments.

XIX.2 Waste type specific assessment

The application of North Macedonia provided a good insight in the waste management situation for all the waste concerned by the request, but information was lacking on the detailed treatment capacity for the waste concerned by the request.

The application of North Macedonia informed about the framework that ensures breakdown prevention, energy recovery, air emission controls for heavy metals, dust, dioxins and furans, and PCBs, wastewater treatment using BAT, environmental risk reduction in handling and transport, waste sorting, and emission controls from kilns and other dusty operations.

However, some information was not provided, such as on technical regulations specific to waste treatment, for example requirements for energy efficiency in paper mills, controls on soil, groundwater, dust, and wind drift from paper storage, biomass waste combustion, diffuse emissions from open-air treatment, digester operation, requirements for controlling (glass) input materials, or applying filtration and material control in glass melting. Moreover, the strategies for emissions and wastewater controls in metal waste should be further elaborated. These elements remain a point of attention.

The application of North Macedonia provided a list of 158 treatment facilities, including their names and addresses, permit numbers, and types of waste treated, covering all the waste concerned by the request. However, of these facilities, North Macedonia does not provide the authorised treatment capacity.

XIX.3 North Macedonia: conclusions

North Macedonia submitted an application to import ferrous metal waste, non-ferrous waste, paper waste, organic and agro-food waste, and glass waste.

As a result of the assessment above, North Macedonia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, paper waste, organic and agro-food waste, for ferrous and non-ferrous metal waste, and glass waste.

Annex XX: Oman

Oman submitted its application on 25 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Oman to provide additional information. Oman provided more information on 18 September 2025 and 8 January 2026.

The application of Oman referred to electrical and electronic waste that could be classified under the code B1110. This code is no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Oman.

The application of Oman also referred to non-hazardous plastic waste classified under code B3010. This code is no longer applicable since 1 January 2021 and B3011 now applies for such waste. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such plastic waste cannot be exported from the EU to non-OECD countries, and was not considered when assessing the application of Oman.

The application submitted by Oman covers 9 groups of eligible types of waste, namely

- Ferrous metal waste: B1010, B1040 and B2090,
- Non-ferrous metal waste: B1010, B1070, B1080, B1100, B1120 and B2110,
- Non-hazardous waste batteries: B1090,
- Glass waste: B2020,
- Paper waste: B3020,
- Rubber waste: B3040,
- Textile waste: B3030,
- Organic waste and agro-food waste: B3060 and B3065 and
- Mineral waste: B2040, B2050 and B2060.

XX.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Oman provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application of Oman provided data regarding the annual quantity of total waste generated in the country as well as figures for such amounts concerning the waste types covered by its request for metals, organic waste, paper and glass. The application of Oman provided a justification when data is not separately reported for other non-hazardous fractions such as textiles or waste batteries.

The application of Oman indicated an overall treatment capacity which is lower than the total waste generated in the country. The application provided an overview of its waste

treatment infrastructure, mentioning the national network of landfills, transfer stations, and recycling facilities, as well as the capacities and plans for major projects such as composting, recycling, incineration, and waste-to-energy.

The application of Oman did not supply specific figures for the most important types of domestic waste. This lack of specific data was explicitly acknowledged in the information and responses provided, stating that national percentages for separately collected material types have not yet been published by the relevant authorities. Official statistics are still under development.

Oman explained in its application in detail their objectives and measures to improve separate collection rates, ranging from the introduction of blue-bin and multi-stream collection systems, residential pilot schemes, a National Circular Economy Strategy with clear rate targets over new regulatory measures for source segregation, public awareness campaigns, and ongoing studies for Extended Producer Responsibility (EPR) schemes. These demonstrate Oman's commitment to expanding the separate collection of key waste streams.

The application of Oman indicated that most of the waste generated domestically is landfilled, but also that it is implementing a comprehensive set of national policies, strategies, and projects aimed at reducing landfill dependency and promoting a circular economy.

The application of Oman indicated that less than 5% of the domestic waste is littered. It further provided information on the initiatives implemented to prevent and clean up litter, e.g., monthly nationwide clean-up campaigns, increased penalties for violations and enhanced public education programmes.

No significant import of municipal or industrial waste is reported in publicly available national statistics. This is because quantitative data for the past three years is compiled internally by the environmental authorities as part of Basel Convention reporting but is not published in the public domain. It is therefore not possible to compare a figure with available customs data. In respect of ensuring that the management of imported waste does not impact the management of domestic waste, Oman explained that imports are primarily driven by recycling opportunities rather than disposal needs, and that the regulatory framework should ensure that the domestic waste management and recycling priorities are not undermined. Oman referred in that regard also to its strategic commitments (e.g., Oman Vision 2040, National Circular Economy Strategy, Basel Convention obligations).

Overall, the application of Oman regarding its national waste management strategy can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Omani law requires that any establishment intending to carry waste must be registered with the competent authority and that a register is maintained and can be provided. Oman also confirmed that the relevant authorities maintain oversight of registered transporters, and that Oman is deploying a new electronic system for transporter registration and waste-transport tracking. This system will record vehicle information and transport activities, effectively constituting a maintained register of establishments carrying waste.

The legal framework in Oman prohibits littering and illegal dumping, enforcing a range of penalties that are designed to be effective, proportionate, and dissuasive—ranging from fines and permit suspensions to criminal prosecution. Facility permits also require continuous monitoring and reporting of emissions and include emergency response procedures to address incidents or accidents. The environmental authorities are empowered to impose immediate shutdowns or corrective actions if operations threaten human health or the environment and can suspend operations until compliance is restored.

Oman has provided in its application a comprehensive list of environmental legislation that includes legal provisions addressing the protection of air, water, and soil.

Oman implements domestic legislation governing the import and export of waste, equivalent to the PIC procedures. In particular, a competent authority was designated for all transboundary waste movements, overseeing a process that requires prior written consent for both imports and exports of non-hazardous waste. Exporters are obliged to submit detailed information regarding the waste, the route, and relevant parties involved, with approvals and documentation requirements consistent with international standards. Customs authorities work in coordination with the competent authority to inspect shipments, ensure proper documentation, and confirm that all transporters are duly registered. While Oman's system is robust and well-implemented, some gaps remain. The legislation does not explicitly require a contract between notifier and consignee, nor does it mandate a financial guarantee or insurance as a precondition for shipment. Furthermore, post-shipment confirmation is mandated to verify the environmentally sound recovery or disposal of waste abroad, ensuring traceability and regulatory oversight throughout the process, but there is no reference to a formal certificate of recovery from the receiving facility.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Oman has established a comprehensive and robust legislative and enforcement framework for waste management overseen by the environmental authorities, who determine the frequency of inspections and monitoring for waste management facilities, typically planning annual and quarterly inspections, but also retains flexibility to increase oversight in response to risk or non-compliance. Monitoring requirements, including emissions measurements, are formalised in facility permits. Both routine and random (ad hoc or risk-based) inspections are carried out, with comprehensive oversight ensured by coordination between the relevant authorities including at municipal level.

The legal framework for penalties is well-documented, with Royal Decree 114/2001 and Decision 107/2023 covering waste management, and Decisions 15/2021 and 51/2023 addressing import/export and transit. The legislation provides for financial, administrative, and legal penalties, including fines, license suspension/revocation, and criminal charges. Oman indicated that enforcement actions have been taken, but remains vague regarding fines and corrective actions for facility non-compliance, and the holding or rejection of non-compliant shipments. Both financial and administrative penalties have been applied, and legal measures are available for serious violations.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Oman has ratified the Basel Convention, and 9 of the 13 remaining multilateral agreements. The Freedom of Association and Protection of the Right to organise convention 1948 (n. 87), and the Right to Organise and Collective Bargaining Convention 1949 (n. 98) we indicated in the request as not ratified. However, Oman indicated that it plans to ratify these conventions. According to desk research, Oman also has not ratified the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), and the Equal Remuneration Convention, 1951 (No. 100).¹⁷

Oman overall complies with the reporting obligations and other obligations of the Basel Convention. Concerning the remaining multilateral agreements, according to Oman's request, its environmental authorities coordinate reporting and have submitted Oman's national reports. However, desk research could not clarify whether Oman does comply with the reporting obligations of the Discrimination (Employment and Occupation) Convention, 1958 (No. 111) and the Equal Remuneration Convention, 1951 (No. 100).

In addition, Oman does not comply with the reporting obligations of the two other conventions that it has not ratified. In this respect, Oman explained that these conventions are implemented in practice.

Overall, Oman largely fulfils its relevant international commitments, but the non-ratification of four ILO conventions remains a point of attention.

XX.2 Waste-stream specific assessments

Ferrous metal waste and non-ferrous metal waste, non-hazardous waste batteries, paper waste, glass waste, organic and agro-food waste, and textile waste

For the eligible types of waste covered by the request of Oman, other than rubber, textile and mineral waste, Oman's legal framework for permitting and pollution control in the waste management sector includes preventive measures against pollution and accidents, efficient resource use, and requirements to operate under permits that define emission limits, monitoring, reporting, maintenance, and emergency obligations. The application further explained the general pollution control measures it takes, including emission limits for heavy metals, dust, dioxins and furans and PCBs, requirements for air pollution control equipment, wastewater management and treatment standards, and authorisation-based controls to reduce environmental risks from waste storage, handling and transfer. Controls are also presented for emissions of HCl, chlorine and HF from thermal treatment. Overall, all key pollutants relevant to the treatment of the wastes concerned are covered.

However, especially for metal waste and non-hazardous waste batteries the framework remain insufficient and should be reinforced in respect of provisions on energy efficiency,

¹⁷ The list of conventions and protocols not ratified by Oman is available here:

https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:103441

including stable shredder feed conditions, energy efficiency plans, energy balance records, separation techniques to increase recovery of secondary materials, or energy-efficient practices in secondary copper production, .

Facilities must adopt pollution control, emergency plans, and monitoring for both storage and handling, with stricter requirements for higher-risk operations. Emissions of dust and harmful substances are controlled using technical measures such as enclosures and filters, and Oman monitors a range of air and water pollutants, specifically listing also adsorbable organically bound halogens (AOX) and total suspended solids (TSS).

The application provided a list of 80 facilities. Of these, 14 facilities are indicated as authorised to treat metals two of which treat glass waste and three paper waste. One facility is indicated as authorised to treat textile waste, eleven facilities are indicated as authorised to treat used edible fats and oil waste, and six to treat organic waste. For each facility listed, Oman provided the names of the facilities authorised under domestic legislation to recover the waste concerned by the request. One point of attention is that the permit numbers of the facilities are not provided for all facilities and nor are the authorised treatment capacities for all facilities.

Rubber waste

The country has pollution controls in place when treating the waste concerned by the request. Facilities must adopt pollution control, emergency plans, and monitoring for both storage and handling, with stricter requirements for higher-risk operations. Emissions of dust and harmful substances are controlled using technical measures such as enclosures and filters, and Oman monitors a range of air and water pollutants, specifically listing heavy metals like lead, cadmium, and mercury. Substances such as dioxins/furans and hydrogen fluoride (HF) are only mentioned without specific limits provided.

More information should be gathered regarding the generation, treatment capacity, quantities of the wastes concerned that are landfilled or recycled, as well as on prospects for the next decade. Oman's application did not provide a solid justification on the reason why the data are lacking.

Finally, 13 facilities are indicated as authorised to treat used tyres. However, the country has applied to import rubber wastes, instead of used tyres.

Mineral waste

The application of Oman demonstrated equivalence with EU benchmarks regarding permitting for waste treatment facilities, as well as for measures in place to manage residual waste from the treatment of mineral waste in an environmentally sound manner, focusing on both preventive measures and operational oversight. The country utilises engineered landfills equipped with leachate collection and gas management systems and has implemented various energy recovery initiatives such as Waste-to-Energy, biogas, and RDF projects.

The country has pollution controls in place when treating the waste concerned by the request. Facilities must adopt pollution control, emergency plans, and monitoring for both

storage and handling, with stricter requirements for higher-risk operations. Emissions of dust and harmful substances are controlled using technical measures such as enclosures and filters, and Oman monitors a range of air and water pollutants, specifically listing heavy metals like lead, cadmium, and mercury. Substances such as dioxins and furans and hydrogen fluoride (HF) are only mentioned without specific limits provided.

More information should be provided on the facilities that would manage the imported mineral waste.

XX.3 Oman: conclusions

Oman submitted an application to import ferrous metal waste, non-ferrous metal waste, waste batteries, glass waste, paper waste, rubber waste (waste pneumatic tyres), textile waste, organic and agro-food waste, and mineral waste.

As a result of this assessment, Oman

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for glass waste, paper waste, rubber waste, textile waste, organic and agro-food waste, and mineral waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Oman to further demonstrate, in particular, which measures are being taken to ensure enforcement of the rules in practice and the ratification of international Conventions mentioned in the WSR. Although used tyres and mineral waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these waste streams imported from the Union is ensured in the country. The Commission intends to reevaluate the inclusion of Oman into the List of countries to which export of waste from the EU is authorised, based on an assessment of information and progress made on these points to ensure the environmentally sound management of waste.

Annex XXI: Pakistan

Pakistan submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Indonesia to provide additional information. Pakistan provided such information on 23 September 2025. Following a second request for additional information from the Commission, Pakistan shared additional information on 9 January 2026.

The application of Pakistan referred to electrical and electronic waste that could be classified under the code GC020. This code is no longer applicable since 1 January 2025. Moreover, according to Article 39(1) of the EU Waste Shipment Regulation, electrical and electronic waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Pakistan.

The application submitted by Pakistan covered 11 types of waste, eligible under Title IV of the WSR, for ferrous metal, non-ferrous metal, batteries, paper, wood, rubber, textile, mineral, glass, and ceramics waste.

- Ferrous metal: B1010, B1040; B1250, B1200, B1210, B1220, B1230, B2090;
- Non-ferrous metal: B1010, B1020, B1030, B1050, B1060, B1070, B1080, B1100, B1115, B1120, B1130, B1140, B1150, B1160, B1170, B1180, B1190, B1240, B2110;
- Waste batteries: B1090;
- Paper waste: B3020;
- Wood waste: B3050;
- Rubber waste: B3040, B3080, B3140;
- Textile waste: B3030, B3035, B3090, B3100;
- Mineral waste: B2010, B2040, B2050, B2060, B2070, B2100, B2130;
- Acidic waste: B2120;
- Glass waste: B2020;
- Ceramic waste: B2030.

XXI.1 Generic assessment

- a) *National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, the application of Pakistan provided comprehensive information on its national waste management strategy and plan, as further described below.

The application provided the annual quantity of total waste generated and 10-years projections. The application also includes an estimate of the country's current treatment capacity for waste in general, and 10-years projections. A comparison between total waste generated and total treatment capacity confirmed that the amount of waste generated is higher than the treatment capacity.

The application of Pakistan indicated that over 80% of high-value recyclables are recovered by the informal sector. Pakistan specifies that the informal sector works closely with municipal systems. To improve collection rates, Pakistan prioritises universal coverage, public awareness, stronger enforcement, public–private partnerships, and infrastructure upgrades, supported by measures such as waste segregation, community engagement, regulatory monitoring, incentives, and technology use, in line with national waste and environmental policies.

The application of Pakistan highlighted a comprehensive set of measures to reduce landfill dependency, including strengthening recycling and circular economy practices, expanding waste treatment infrastructure, and advancing waste-to-energy solutions. These actions are supported by regulatory frameworks, public awareness initiatives, and institutional capacity building. Key initiatives include formalising the informal recycling sector, investing in advanced technologies, and developing modern waste infrastructure.

The application highlights that the country is strengthening waste management through new recycling and treatment initiatives at national and provincial levels.

In order to decrease the quantity of littered waste in the future, Pakistan implements nationwide and provincial initiatives to improve waste management, reduce plastic pollution, and prevent littering, combining public awareness campaigns, regulatory bans, recycling promotion, school programmes, and large-scale collection reforms supported by public–private partnerships and international funding.

The application indicated that imported waste is handled exclusively by authorised industrial recyclers under Standard Operating Procedures, where it is processed together with domestically generated recyclable waste to optimise recovery and recycling efficiency. Pakistan also clarified that residuals are managed in accordance with local government and Environmental Protection Agency regulations, and that existing and planned infrastructure provides adequate capacity to manage both imported and domestic waste without disruption.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Pakistan provided detailed information on the permitting and regulatory framework governing the transport of non-hazardous waste. The submission clarified that local governments, under respective provincial acts, are responsible for licensing and oversight of waste transport operations. It also described the role of Waste Management Companies and Environmental Protection Agencies in approving Environmental Management Plans to ensure compliance with safety and environmental standards.

Regarding other relevant domestic legislation, the application of Pakistan provided detailed descriptions of two legislative instruments: the Federal and Provincial Hospital Waste Management Rules and the Policy on Controlling Smog 2017. The submission outlines specific provisions ensuring the protection of air, soil, and water through measures such as segregation, safe transport, treatment, and disposal of hazardous hospital waste, and through controls on fuel quality, vehicular emissions, waste burning, and industrial processes. The Pakistan Environmental Protection Agency (PEPA) is the overarching framework protecting the environment in Pakistan and lays down requirements for limiting on pollution of soil, water, and air.

The application of Pakistan furthermore provided a detailed description of the implementation of the Prior Informed Consent (PIC) procedure, outlining the Standard Operating Procedures established by the Ministry of Climate Change and coordinated with Provincial Environmental Protection Agencies. The application clarifies the stepwise process for granting import permission, including document verification, pre-shipment inspection, and environmental compliance checks under the Import Policy Order. It also confirms that prior written consent is required before import and that imported non-hazardous waste is subject to control and monitoring measures. Moreover, the application of Pakistan specified that the prior written consent procedure applies to the export of the waste concerned by the request.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Pakistan provided comprehensive details on the legal and institutional framework for enforcing domestic legislation on waste management and waste shipments. The additional information clarified inspection powers and planning as well as coordination mechanisms. It also included examples of penalties imposed and described risk-based inspection procedures for waste shipments. However, the application of Pakistan did not provide quantitative data on the total number or frequency of inspections conducted at waste management facilities or for waste shipments, limiting the assessment of implementation effectiveness.

Pakistan's application demonstrates a well-established regulatory framework for environmental monitoring and enforcement, including annual permit reviews, structured and non-routine inspections, mandatory emissions monitoring with verified reporting, and effective, proportionate penalties, including suspension or closure of operations in cases of serious non-compliance. Regular inspections of waste management facilities are supported by certified laboratory testing, and illegal dumping is prohibited with sanctions. However, the framework provided does not mention routine inspections of waste collection and transport covering waste origin, quantity, and destination, nor does it clearly set out measures for managing environmental or health incidents.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Pakistan has ratified the Basel Convention. The application provides evidence that the country complies with the reporting obligations of the Basel Convention. No additional issues concerning the implementation of other obligations of the Basel Convention were identified. The application of Pakistan further indicated that it has ratified all 13 multilateral agreements and complies with the respective reporting obligations.

Pakistan fulfils its relevant international commitments.

XXI.2 Waste-stream specific assessments

The application of Pakistan listed 259 treatment facilities, including their names and addresses, the types of waste treated (or the treatment processes implemented by those facilities), and their treatment capacity. However, it did not provide the permit numbers of those facilities.

Ferrous metal waste and non-ferrous metal waste

Concerning metal waste, Pakistan's application provides sufficient information on its national waste strategy or plan. In particular, the application provides an estimate of the annual quantity of municipal metal waste generated in the country, as well as information on how the quantities will develop in the next 10 years, an estimate of the country's treatment capacity and 10 years projection of the country's treatment capacity, the proportion of domestic waste concerned by the request that is landfilled and the proportion of domestic waste concerned by the request that is recycled. However, it was not demonstrated that sufficient treatment capacity is available.

The application of Pakistan provided a sufficient overview of its permitting framework for waste treatment and disposal facilities. It explains that permits, specify authorised waste types and quantities, approved processes, compliance with National Environmental Quality Standards, monitoring and reporting obligations, occupational safety measures, and requirements for safe handling, storage, disposal, and after-care. Permits are subject to annual reconsideration under federal and provincial regulations. Provisions for site closure, decommissioning, and post-closure care are explicitly addressed within the EMP. The framework applies uniformly across facility types and sizes, including landfills, ensuring consistency in permit content, operational requirements, and environmental safeguards.

Facilities are required to operate with preventive measures against pollution and accidents and to use resources efficiently. Permits include emission limits, environmental management plans, monitoring and reporting obligations, and conditions for abnormal operations. Landfill permits and technical guidelines specify waste acceptance criteria and include provisions for closure and after-care, supported by inspections and audits to verify compliance. However, the application did not demonstrate a ban on landfilling of separately collected waste intended for reuse or recycling.

Pakistan's application demonstrated pollution controls for the treatment of ferrous metal waste. The overview of the provided framework includes measures to reduce air emissions of dust, metals, dioxins and furans and PCBs, enforce wastewater treatment and water consumption optimisation, and mitigate environmental risks during storage, handling, and transfer of waste. It also addresses safe storage and separation of recyclable and non-recyclable ELV components. However, Pakistan does not provide key requirements essential for metallurgical treatment: maintaining a stable shredder feed, increasing recovery of secondary materials, ensuring efficient energy use in secondary copper production, or preventing diffuse emissions during scrap pretreatment. If all key pollutants relevant to ferrous and non-ferrous metal waste are addressed, exact limit values are not always identified.

Waste batteries

The application provided a sufficient description of Pakistan's national waste management strategy or plan regarding waste batteries. However, it was not demonstrated that sufficient treatment capacity is available.

The application does not demonstrate a ban on landfilling of separately collected waste intended for reuse or recycling, nor mentions a ban on the landfill disposal of batteries.

The pollution controls framework includes measures to treat non-hazardous battery waste, reduce air emissions of dust, metals, dioxins and furans and PCBs, limit HCl, Cl₂, and HF emissions, optimise water consumption, and ensure wastewater treatment using BAT. However, Pakistan does not demonstrate that essential requirements are applied, such as maintaining a stable shredder feed, increasing recovery of secondary materials, ensuring efficient energy use in secondary copper production, or preventing diffuse emissions during scrap pretreatment.

Paper waste

The application provided a sufficiently detailed description of Pakistan's national waste management strategy or plan regarding paper waste. Also for this waste type, it remains a point of attention whether sufficient treatment capacity is available.

A point of attention remains that Pakistan does not explicitly ban landfilling of separately collected waste intended for reuse or recycling, nor does it fully regulate certain kiln- or dust-related emissions.

More information should be gathered on the pollution controls of paper waste treatment that are implemented in Pakistan. The application for example does not provide information on requirements for maintaining a stable shredder feed, controlling scrap quality, or preventing diffuse dust emissions from storage, handling, and transport. Several paper waste-specific measures, such as energy reduction, VOC control, water reuse optimisation, and pollution prevention, are entirely unaddressed. Furthermore, not all key pollutants related to paper waste management or to residues from paper waste are addressed.

Wood waste

The application provided an adequate estimate of the annual waste generated in the country, as well as projections for the next 10 years, but it fell short of providing an estimate of the country's treatment capacity, 10 years projection of the country's treatment capacity, the proportion of domestic waste concerned by the request that is landfilled and the proportion of domestic waste concerned by the request that is recycled.

Pakistan's application provided a sufficiently detailed overview of its permitting framework for waste treatment and disposal facilities. However, the framework does not address limits for total organic carbon in slag or minimum temperatures for waste gas treatment.

The application provided sufficiently detailed information on the management of residues from wood waste. However, points of attention remain. Pakistan does not regulate biomass waste combustion, ban landfilling of separately collected waste for reuse or recycling, or require recycling of incineration residues. Emission controls and appropriate treatment for kiln operations, as well as dust reduction from non-kiln operations, are not addressed. Nonetheless, all key pollutants related to residues from wood waste were addressed.

The application provided some information on pollution controls. However, the application did not mention requirements for biomass waste combustion, emissions or treatment in kilns, or dust reduction from non-kiln operations. Nonetheless, all key pollutants related to wood waste management were addressed.

Rubber waste

The application provided general description of Pakistan's national waste management strategy or plan regarding rubber waste. Similar information as for wood waste should be further gathered.

The application did not address limits for total organic carbon in slag or minimum temperatures for waste gas treatment.

Regarding the treatment of residues, Pakistan did not explicitly ban landfilling of separately collected waste intended for reuse or recycling, nor does it fully regulate certain kiln- or dust-related emissions.

Key pollutants relevant to rubber waste management as well as residues management were addressed. On pollution controls, no information was provided on the regulation of kiln operations, including emissions, waste treatment, and dust reduction.

Due to limited data, concrete statistics on recycling, landfilling, or burning of waste tyres nationwide are unavailable. Overall, the situation differs regionally, but concerns over illegal burning and inadequate disposal persist.

Textile waste

The application provided a sufficiently detailed description of Pakistan's national waste management strategy regarding textile waste. In particular, the application provides an estimate of the annual quantity of waste generated in the country, as well as information on how the quantities will develop in the next 10 years, the proportion of domestic waste concerned by the request that is landfilled and the proportion of domestic waste concerned by the request that is recycled. However, the application did not provide an estimate of the country's treatment capacity or 10 years projection of the country's treatment capacity.

The application provided sufficient information on the management of residues from textile waste. However, Pakistan does not explicitly ban landfilling of separately collected waste intended for reuse or recycling, nor does it fully regulate certain kiln- or dust-related emissions. Moreover, not all key pollutants related to residues from textile waste were addressed.

On pollution controls, the application provides an acceptable framework for managing textile waste. However, no information was provided on the regulation of kiln operations, including emissions, waste treatment, and dust reduction. Nonetheless, all key pollutants relevant to textile waste management are addressed.

Mineral waste and acidic waste

The application provided a sufficiently detailed description of Pakistan's national waste management strategy or plan regarding mineral and acidic waste. Also for this waste type, it remains a point of attention whether sufficient treatment capacity is available.

The application provided a sufficiently detailed description of Pakistan's national waste management strategy regarding mineral waste and acidic waste. The application also provided comprehensive information on the management of residues from mineral waste. However, Pakistan does not explicitly ban landfilling of separately collected waste intended for reuse or recycling.

Pakistan's response is sufficient regarding pollution controls for managing mineral waste or acidic waste.

Nevertheless, Pakistan's application did not provide requirements for maintaining a stable shredder feed, controlling scrap quality, or preventing diffuse dust emissions from storage, handling, and transport. Nonetheless, all key pollutants relevant to mineral waste and acidic waste are addressed.

Glass waste

The application provides a sufficiently detailed description of Pakistan's national waste management strategy or plan regarding glass waste. Also for this waste type, it remains a point of attention whether sufficient treatment capacity is available.

The application provides a comprehensive overview of its permitting framework for waste treatment and disposal facilities. It also provides comprehensive information on the management of residues from glass waste. However, Pakistan does not explicitly ban landfilling of separately collected waste intended for reuse or recycling.

Pakistan's response for the management of glass waste is satisfactory. The overview of the legislative framework provided includes measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs, alongside controls on input materials and the use of cleaner fuels in glass production. Emission reductions from glass melting are supported through mandatory stack controls and the application of filtration and scrubbing systems. Moreover, all key pollutants relevant to glass waste management are addressed.

Ceramic waste

The application provided a sufficiently detailed description of Pakistan's national waste management strategy or plan regarding glass waste. Also for this waste type, it remains a point of attention whether sufficient treatment capacity is available.

Pakistan's application provided a comprehensive overview of its permitting framework for waste treatment and disposal facilities. Furthermore, it provides comprehensive information on the management of residues from ceramics waste.

Pakistan's response for the management of ceramics waste meets the expected standards regarding pollution controls, as it provided an overview of its legislative framework concerning the reduction of air emissions of heavy metals, dust, dioxins and furans, and PCBs. Moreover, all key pollutants relevant to ceramic waste treatment are addressed.

XXI.3 Pakistan: conclusions

Pakistan submitted an application to import ferrous metal waste, non-ferrous metal waste, batteries and catalysts waste, paper waste, wood waste, rubber waste, textile waste, mineral waste, acidic waste, glass waste and ceramics waste.

As a result of this assessment, Pakistan

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, for textile waste, paper waste, wood waste, rubber waste, mineral waste, acidic waste, glass waste and ceramic waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for battery waste and ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Pakistan to demonstrate how the implementation of Waste Management Guidelines is progressing and delivering results for improved waste management in the country, as well as clarify the levels of emission limits applied to mitigate pollution from waste management facilities. Additional information on the number of inspections and penalties linked to breaches of environmental legislation in the waste sector is also essential. Although paper waste, wood waste and rubber waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these waste streams imported from the Union is ensured in the country.

Annex XXII: The Philippines

The Philippines submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited The Philippines to provide additional information. The Philippines provided more information on 19 September 2025 and 30 January 2026.

The application submitted by The Philippines covers paper waste.

XXII.1 Generic assessment – waste stream specific assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, The Philippines provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The Philippines provided data regarding the annual quantity of total waste generated in the country (22.5 million tons, 1.1 million tons of which are paper waste), as well as future projections. For instance, paper consumption is projected to grow by 5% every year, and waste paper recovery by about the same rate.

The Philippines indicated that 53-60% of waste paper is recycled, the rest is re-exported, re-used in non-paper applications or landfilled (less than 1%). Therefore, for the purposes of this assessment, the figures for recycling capacity are considered valid also for treatment capacity. The estimated country's current recycling capacity for waste in general is at 1.8 million tons (1.5 million tons paper mill capacity for recycled paper). Hence, the treatment capacity for paper is indicated to be higher than the paper generated annually.

While the Philippines supplied information on the objectives and measures to increase the proportion of separately collected waste, namely the fact that local paper mills plan to set up more baling stations (waste paper collecting stations) and expand their geographical collection in The Philippines, concrete figures on the proportion of waste separately collected in the country was not provided.

The Philippines provided comprehensive information on littering in their country. According to industry figures, only 0.5-2% of domestic waste is littered. In particular, uncollected waste paper from domestically produced paper constitute only 1% of total solid wastes generated annually. The primary Philippine law addressing littering is Presidential Decree No. 825, which penalises improper disposal of garbage and other forms of uncleanness, alongside local ordinances.

From 2022 to 2024, the Philippines imported nearly 10 million tons of waste, including 127,000 tons of paper waste. To ensure that imported waste will not negatively impact generated waste management, the country referred to recent expansion projects undertaken by major industry players which raised industry capacity by 30%. There will be an

additional demand for imported paper waste by about 200,000 tons/year to supplement locally-collected paper waste.

Overall, the application of The Philippines regarding its national waste management strategy can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Entities in The Philippines, involved in the professional transport of hazardous waste must be registered with the competent authority. For other waste, importers must also be registered and secure an Importation Clearance from the competent authorities and applications are processed through the Online Permitting and Monitoring System (OPMS). Customs authorities have access to the OPMS to verify regulated shipments.

The Philippines has established a robust legal and regulatory framework for waste management, featuring penalties for non-compliance, including fines, community service, and imprisonment. Authorities are empowered to suspend operations for serious breaches of permits, supported by a systematic inspection regime involving routine and non-routine checks by relevant authorities. Specific laws prohibit and penalise littering and illegal dumping, while regular inspections and monitoring of waste generators, transporters, and treatment facilities ensure ongoing compliance. Emissions are also monitored and recorded to verify adherence to environmental standards.

The country also established comprehensive measures for the protection of air, soil, water, and human health in relation to waste management.

The country enforces strict requirements regulating operations in paper mills. There are detailed standards for waste treatment facilities, including emission limits, monitoring, reporting, pollution control measures, and operational protocols.

Regarding the management of residual waste generated by treating paper waste, the country enforces strict permit requirements, including the establishment of emission limits for air, soil, and water, and mandates comprehensive monitoring and reporting protocols for facilities. Landfill operations are governed by detailed regulations, with clear systems for gas control, leachate treatment, and groundwater monitoring, as well as regular inspections and self-monitoring reports. The legal framework also specifies that only residual waste, which cannot be composted, reused, or recycled, may be landfilled, and prohibits the landfilling of recyclable materials. Waste characterisation and testing procedures are in place, ensuring that hazardous and special wastes are managed separately and that landfill waste acceptance criteria adhere to national standards. Furthermore, closure and after-care requirements for landfills are well defined, including penalties and monitoring obligations to ensure long-term compliance.

In addition to these measures, the Philippines provided national emission limits for a range of pollutants in waste incineration and co-incineration processes. The framework sets emission limits for dust, hydrogen chloride, nitrogen oxides, heavy metals, dioxins, furans, and total organic carbon, with most limit values aligning with EU benchmarks.

The Philippines also demonstrated measures to ensure pollution controls in relation to the management of paper waste. Key measures include a system for minimising and recycling solid waste, with the enforcement of waste segregation at source, and restrictions on landfilling residual waste. The country has established legal requirements for wastewater treatment, ensuring paper mills employ multi-stage processes and maintain discharge permits with regular monitoring. National regulations also set emission standards for air pollutants and hazardous substances and prohibit incineration of waste that could release toxic fumes.

In addition to the pollutants mentioned above, the Philippines identified other key pollutants associated with paper waste treatment more specifically, such as chemical oxygen demand (COD), adsorbable organically bound halogens (AOX), and total suspended solids (TSS), though no detailed emission limit values were indicated.

Regarding the import and export of paper waste, the issuance of a permit or clearance is not required. Nonetheless, only registered importers are allowed to import recyclable materials. Importers must comply with environmental laws and secure an Importation Clearance from the competent authority at least 30 working days prior to importation.

If there is no operational facility for proper treatment of a specific hazardous waste in the Philippines, it must be exported to countries that are parties to the Basel Convention or have relevant agreements.

Overall, the application of The Philippines regarding its waste management and environmental legal framework can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The country has established a comprehensive legislative framework mandating the relevant authorities to plan and conduct inspections across various waste management operations. Multiple laws require both routine and planned inspections, as well as compliance checks, including the verification of permits and environmental monitoring. While the system mandates regular facility inspections and thorough document reviews, there is limited explicit reference to unannounced or risk-based spot checks, and no quantitative data are provided regarding the actual number of inspections carried out.

In terms of penalties, Philippine legislation prescribes a strict and tiered penalty regime for violations of waste management regulations. The laws allow for the imposition of fines, community service, imprisonment, and suspension of operations, ensuring that sanctions are effective, dissuasive, and proportional to the severity of non-compliance. The competent authorities are entitled to enforce these penalties, with evidence showing that fines and operational suspensions have been applied in practice. However, there is no quantitative data available on the frequency or number of penalties imposed.

Overall, the application of The Philippines regarding its implementation and enforcement of the waste management and environmental legal framework can be assessed as sufficiently demonstrating equivalence with the EU's requirements on that.

The Philippines' application provided the relevant details for four registered facilities, including their names and addresses, permit numbers, the types of waste the facilities are authorised to recover, and the authorised treatment capacities.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

The Philippines has ratified the Basel Convention. The country complies with the reporting obligations of the Basel Convention. No issues were observed regarding compliance with other obligations under the Convention.

The Philippines further has ratified all multilateral agreements and provided evidence that it complies with their reporting obligations.

Overall, The Philippines fulfils its relevant international commitments.

XXII.2 The Philippines: conclusions

The Philippines submitted an application to import paper waste.

As a result of the assessment above, The Philippines could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation for paper waste.

Annex XXIII: Saudi Arabia

Saudi Arabia submitted its application on 19 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Saudi Arabia to provide additional information in June 2025. However, no additional information was received. In reply to another invitation for additional information, Saudi Arabia more information on 12 January 2026.

The application of Saudi Arabia referred to non-hazardous plastic waste classified under code B3010. This code is no longer applicable since 1 January 2021 and B3011 now applies for such waste. However, according to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Saudi Arabia.

The application submitted by Saudi Arabia covered 9 groups of eligible waste types:

- Ferrous metal waste: B1010, B1200, B1210, B1220, B1230;
- Non-ferrous metal waste: B1010, B1050, B1070, B1100, B1130;
- Paper waste: B3020;
- Wood waste: B3050;
- Rubber waste: B3040;
- Textile waste: B3030;
- Organic and agro-food waste: B3060; B3065;
- Mineral waste: B2040, B2050;
- Glass waste: B2020.

XXIII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Saudi Arabia provided satisfactory information on its national waste management strategy and plan.

The application included an estimate of total waste generation, clearly quantified in aggregate terms and supported by a transparent calculation method. It also included a ten-year projection of total waste generation, grounded in population growth trends and supported by statistical modelling.

The application of Saudi Arabia presented an estimate of the country's current treatment capacity for waste in general and explains that this figure is derived from facility-level operational data collected from treatment installations. When compared with the annual quantity of total waste generated, this information indicates a substantial gap between existing treatment capacity and national waste generation levels. The application also provided a ten-year projection, targeting a significant increase in treatment capacity to 41.4 MT annually by 2035.

The application indicated that the overall proportion of domestically generated waste that is separately collected is estimated at around 10% in 2024, and clearly describes the methodology used to calculate this figure. It also outlined objectives for substantially increasing source segregation rates over the coming decade and presents a coherent set of measures to support this objective. However, the information did not include a breakdown of the proportion of separately collected waste by the most important domestic waste types, nor does it provide a specific methodology for calculating separate collection rates for these proportions.

The application of Saudi Arabia set out long-term objectives to decrease the rate of landfilled waste, with ambitious landfill diversion targets supported by national strategies and sectoral plans. It also identifies a coherent set of measures to achieve these objectives, including the expansion of recycling and recovery infrastructure, the development of waste-to-energy capacity, the introduction of landfill diversion mandates and economic instruments, and the use of service contracts to mobilise private sector investment.

The application defined clear and progressive objectives to increase recycling rates for the waste types concerned. It also outlines a coherent set of measures aimed at achieving these objectives, including the expansion and modernisation of recycling infrastructure, the rollout of nationwide source segregation systems, the use of financial incentives to encourage participation, and the implementation of public awareness and education programmes.

The application outlined a structured set of measures to prevent and address littering, combining regulatory enforcement, clean-up actions and awareness-raising initiatives. The submission provides quantitative information on the waste imported, supported by a clearly defined methodology based on licensing, permitting and regulatory oversight. The information also described objectives and measures to increase recycling rates through strict monitoring, infrastructure development and integration of imported waste into circular economy strategies.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application confirmed that any establishment intending to transport waste on a professional basis must obtain a licence and register with the competent authority, with registration forming an integral part of the authorisation process. The information also highlighted digital systems, including an online registration platform and an electronic waste manifest, which facilitate oversight and traceability of transport activities. However, more information on a formal, consolidated register of all establishments carrying or transporting waste, would be needed.

Regarding other relevant legislation the application demonstrates a comprehensive regulatory framework covering the protection of the environment and public health in all aspects of waste management. The legislation in place establishes requirements for environmentally sound waste treatment, environmental impact assessments, strict limits for emissions to air, soil, and water, proper management of industrial, medical, and municipal waste, and oversight of transboundary waste movements.

The application provided a legal and regulatory framework for the import and export of waste, including both hazardous and non-hazardous types. It set out strict prohibitions on hazardous waste imports, licensing requirements for non-hazardous waste imports, and conditions for waste exports, in full alignment with the Basel Convention. The Saudi legal framework integrates the Prior Informed Consent (PIC) procedure, covering notification, consent, transboundary movement, and confirmation of treatment, and requires comprehensive documentation of waste nature, quantity, and destination.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Regarding the strategy for the enforcement of domestic legislation, the application adequately demonstrated that a legislative and regulatory framework for inspections and penalties is in place, providing for regular and unannounced inspections of waste management facilities, controls on waste shipments, and document checks. Inspections are implemented in practice, supported by high inspection numbers, shipment monitoring, digital tracking systems, and GPS-based controls. Saudi Arabia's application also showed that the legal framework establishes a wide range of penalties for infringements, including fines, licence revocation, operational bans, and imprisonment. Moreover, the information provided demonstrates that inspection planning is formally established in legislation through risk-based inspection programmes. However, it did not explicitly confirm the systematic use of spot checks and physical inspections of waste recovery operations. In addition, while penalties were described as strict, the application does not provide concrete evidence of their application in practice, such as data on sanctions imposed or licences suspended or revoked.

The application demonstrated a structured and systematic inspection system, including regular and unannounced inspections supported by trained inspectors, digital tools, and data analysis, covering waste management facilities, transport, and disposal activities. Non-compliance is addressed through audits, photographic evidence, and follow-up enforcement measures. Illegal waste handling, disposal, and dumping are prohibited and subject to substantial administrative and criminal penalties. Transport inspections cover the origin, nature, quantity, and destination of waste using e-manifests, GPS monitoring, and documentation. Penalties include fines, imprisonment, licence revocation, and operational bans. Operational licences can be suspended or revoked if violations pose serious danger, and emissions are monitored with records maintained for compliance verification. However, the application does not provide information showing that inspection or monitoring frequency is formally set by the competent authority, nor does it describe legally defined procedures or obligations for measures to be taken in the event of incidents.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Saudi Arabia has ratified the Basel Convention. The application provided evidence that the country complies with the reporting obligations of the Basel Convention. The application further indicated that the country has ratified all other relevant multilateral agreements

except the Equal Remuneration Convention and the Discrimination Convention. On this matter, the application of Saudi Arabia stated that the country is in the process of reviewing Conventions in light of its legal and institutional framework and argued that it has a comprehensive labour law guaranteeing all rights to workers.

XXIII.2 Waste-stream specific assessments

The description of the national waste management strategy or plan regarding the waste streams concerned by the request included the proportion of domestic waste concerned by the request that is landfilled and the proportion of domestic waste concerned by the request that is recycled. However, more information should be gathered on the annual quantity of waste concerned by the request generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity for the waste concerned by the request, and 10 years projection of the country's treatment capacity for such waste.

The application provided a publicly accessible online directory of relevant treatment facilities, listing 1,006 licensed companies authorised to carry out waste management activities. The information made available includes the names and addresses of treatment facilities and the types of waste they are authorised to handle, covering a broad range of activities such as collection, transport, treatment, recovery, and disposal of hazardous and non-hazardous waste. However, the directory did not disclose permit numbers or the authorised treatment capacities of the facilities.

Ferrous metal waste and non-ferrous metal waste

The application provided sufficient information on the permitting system in Saudi Arabia. The information provided shows that permits and licences for waste treatment and disposal facilities specify operational requirements, authorised waste types and quantities, technical and safety measures, monitoring obligations, and provisions for closure and after-care. It also demonstrates that landfill permits are issued only after compliance with technical and safety requirements has been verified, with inspections conducted prior to the start of disposal operations. Moreover, the framework demonstrated that all facilities are periodically reassessed to ensure continued compliance, and that all waste treatment and recovery facilities must comply with closure and aftercare obligations.

The application indicated that waste management installations are required to operate with preventive measures against pollution and accidents and to use resources efficiently. Permits include emission limits, soil and groundwater protection measures, monitoring and reporting obligations, and conditions for abnormal operations. Landfill permits and technical guidelines specify waste acceptance conditions and include provisions for closure and after-care, supported by inspections to verify compliance. However, the application did not demonstrate bans on waste dilution or mixing, testing requirements, annual compliance testing, use of independent laboratories, specific limit values for co-disposal of waste, or a ban on landfilling separately collected waste intended for reuse or recycling.

Regarding provisions on pollution controls, the application is insufficient demonstrating equivalence. The overview of the framework provides measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission control requirements and monitoring obligations. It also addresses the optimisation of water consumption and the prevention of wastewater emissions through general pollution control and monitoring requirements. Environmental risks related to the storage, handling, and transfer of waste are mitigated through licensing, designated facilities, and compliance obligations. However, it does not provide requirements for maintaining a stable shredder feed, implementing energy efficiency plans or energy balance records, controlling scrap quality to minimise pollutants, or preventing and reducing diffuse dust emissions. Moreover, not all key pollutants relevant to ferrous metal waste are addressed. Regarding non-ferrous metals, specific measures to reduce HCl, Cl₂, and HF emissions and information on most key pollutants for non-ferrous metal waste treatment are not provided.

Paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste

The application provided sufficient information on the permitting systems for these waste streams. However, it did not explain explicit requirements on total organic carbon limits in incineration residues or minimum temperature conditions for waste gas treatment.

More information on the treatment of residues from paper waste, wood waste, rubber waste, organic and agro-food waste is needed to fully assess the environmentally sound management thereof. The application indicated that installations must operate with preventive measures against pollution and accidents, promote efficient resource use, and comply with permit conditions that include emission limits, soil and groundwater protection, and monitoring and reporting obligations. Landfill permits address waste acceptance conditions and include provisions for closure and after-care, while inspections support compliance. Recycling or recovery of incineration residues is encouraged where feasible. However, more information is needed to demonstrate bans on landfilling separately collected waste, waste dilution or mixing, comprehensive waste characterisation and testing, use of independent laboratories, or specific emission control and substance management requirements for kiln and other dusty operations.

Regarding pollution controls for paper waste, the framework explained in the application outlines general measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission limits, pollution control provisions, and mandatory monitoring, and it addresses the optimisation of water consumption and the prevention of wastewater emissions. The framework also includes requirements to reduce environmental risks related to the storage, handling, and transfer of waste through licensing and compliance mechanisms. However, it does not provide requirements on energy efficiency planning, substance control in kilns, reduction of dust emissions from kiln and non-kiln operations, or sector-specific measures for energy use, material recovery, and water reuse.

Also more information should be gathered on pollution controls for wood waste management. The explained framework includes requirements to reduce air emissions of dust, particulate-bound metals, and dioxins through emission limits and mandatory monitoring, and it addresses general pollution control for organic air pollutants. Measures are also in place to optimise water consumption, prevent wastewater discharges, and reduce environmental risks associated with the storage, handling, and transfer of waste through

licensing and compliance requirements, and provides technical regulations for biomass waste combustion plants. However, it does not provide explicit provisions for malfunctions of abatement equipment, energy efficiency plans, or the application of BAT for wastewater treatment. The implementation of specific requirements for kiln operations, substance control, dust emission reduction techniques, and comprehensive monitoring of all key pollutants remain points of attention.

More information is needed to fully assess pollution controls for rubber waste. The application set out general measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission limits and mandatory monitoring, and it includes requirements to optimise water consumption and prevent wastewater emissions. The framework also addresses environmental risk reduction in the storage, handling, and transfer of waste through licensing and compliance obligations, and the management of breakdown situations. However, it does not provide requirements for energy efficiency planning, substance control and quality assurance for wastes used in kilns, or specific measures to reduce dust emissions from kiln and non-kiln operations.

More information is needed to fully assess pollution controls for textile waste as the application does not provide technical regulations to reduce organic compound emissions, requirements for energy efficiency planning. It also lacks substance control and quality assurance requirements for wastes used in kilns, and detailed measures to reduce dust emissions from kiln and non-kiln operations. Moreover, most key pollutants applicable to textile waste are not mentioned.

Finally, regarding pollution controls for organic and agro-food waste management, more information is needed to fully demonstrate equivalence. The application does not provide technical regulations covering energy efficiency planning, or the monitoring and control of open-air treatment, digesters, and waste gases. Most key pollutants relevant to the treatment of organic and agro-food waste are not mentioned.

Mineral waste and glass waste

Saudi Arabia's application provided clear information on the permitting systems for these waste streams.

More information is needed however, on residual waste management of mineral waste. The application indicated that waste management installations are required to operate with preventive measures against pollution and accidents and to use resources efficiently. Permits include emission limits, soil and groundwater protection measures, monitoring and reporting obligations, and conditions for abnormal operations. Landfill permits and technical guidelines specify waste acceptance conditions and include provisions for closure and after-care, supported by inspections to verify compliance. However, more information is needed to explicitly demonstrate bans on waste dilution or mixing, detailed waste testing requirements, annual compliance testing, use of independent laboratories, specific limit values for co-disposal of waste, a ban on landfilling separately collected waste intended for reuse or recycling, or limit for inert waste acceptance.

Also, more information is needed to fully demonstrate pollution controls for mineral waste treatment. The application outlined measures to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs, through emission control requirements and monitoring, and

it includes provisions to optimise water consumption and prevent wastewater emissions. Environmental risks related to waste storage, handling, and transport are addressed through licensing and requirements for safe and controlled management. However, it did not provide requirements for maintaining a stable shredder feed, implementing energy efficiency plans, or controlling scrap quality to minimise pollutants. More information should further be gathered on specific measures to prevent diffuse dust emissions and to reduce mercury, dioxin, and PCB emissions from sinter strands. Key pollutants relevant to the treatment of mineral waste are largely not mentioned.

The application also did not sufficiently demonstrate pollution controls for glass waste management and more information is needed. The application highlighted the existence of requirements to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs through emission control measures and pollutant monitoring under the Technical Guidelines for Solid Waste Management. However, it did not provide any specific technical regulations concerning the control of input materials in glass production, the reduction of metal emissions during glass melting, or filtration and material control measures in glass melting processes. In addition, key pollutants relevant to the treatment of glass waste are largely not mentioned.

XXIII.3 Saudi Arabia: conclusions

Saudi Arabia submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, and glass waste.

As a result of this assessment, Saudi Arabia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste, wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, and glass waste
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need to further demonstrate, in particular, which measures are being taken to gather solid data on waste generation and available treatment capacities for each waste streams, to ensure that all pollution linked to waste management facilities for the requested waste is being properly monitored and mitigated, including through monitoring of all key pollutants and to address breaches of environmental legislation. Although wood waste, rubber waste, textile waste, organic and agro-food waste, mineral waste, and glass waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these wastes is ensured in the country.

Annex XXIV: Serbia

Serbia submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Serbia to provide additional information. Serbia provided more information on 30 October 2025 and 12 January 2026.

The application submitted by Serbia covers 5 groups of eligible types of waste, namely:

- Ferrous metal waste (B1010 (classified under EU List of Waste codes 170405, 191001 and 120101 (iron and steel waste) and B1230 (classified under EU List of Waste code 100210 (mills arising from the manufacture of iron and steel));
- Non-ferrous metal waste (B1010 (classified under EU List of Waste codes 170401, 191203 and 120103 (copper waste) and 170402 (aluminium waste)) and B1020 (classified under EU List of Waste codes 170403 (lead waste));
- Rubber waste (B3140 (waste tyres)) and
- Paper waste (B3020 (classified under EU List of Waste codes 150101, 191201 and 200101)).

XXIV.1 Generic assessment

- a) *National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of Serbia provided the annual quantity of total waste generated in the country. However, the application contained data on total produced quantities which are based on solely data from public utility companies that collect waste and on data from companies that generate waste. Also, not all entities have reported the quantities of waste produced.

The application of Serbia only provided estimates of the country's current treatment capacity for waste. The application did not provide the overall proportion of separately collected waste. It provided the proportion of the waste separately collected for paper waste and waste tyres. It further provided information on objectives and measures, indicating that Serbia is enhancing its waste management practices by strengthening separate collection systems and raising public awareness.

According to the information in the application, approximately 80% of the municipal waste in Serbia is landfilled.

The application provided information on objectives and measures, mentioning that the measures are taken to prevent new dump sites and to clean existing ones, namely with a Waste Prevention Plan, that is under development. The application did not provide further information on the quantity of waste that is littered.

The application of Serbia provided figures on the waste imported for each EU list of Waste code requested. This includes paper waste and waste tyres. However, mineral waste is not mentioned.

Regarding the need for imported waste to be managed in compliance with environmental protection standards and ensuring that it will not negatively impact domestic waste management, the application mentioned the procedures for importing waste which are compliant with the Basel Convention and that the waste imported from the EU are destined to the recycling industry.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Serbia requires waste transporters to be registered, and a register of waste transport companies is maintained by the authorities.

The application demonstrated equivalence with EU benchmarks regarding permitting for waste treatment facilities, including through effective permitting processes, preventive and resource-efficiency measures, and strict standards for landfill operation, including requirements for environmental monitoring and compliance.

Serbia's application provides high-level information demonstrating that its waste management system incorporates preventive measures and efficient resource use at installations, comprehensive permit requirements, and strict landfill acceptance and operational standards. The country's application outlined robust procedures for waste characterisation, testing, and compliance, including bans on the landfilling of separately collected reusable or recyclable waste and on the dilution or mixing of waste to meet admissibility criteria. It also covers ongoing monitoring, closure, and post-closure care for landfills, with all testing conducted by accredited laboratories, ensuring thorough oversight and environmental protection throughout the waste management process.

Overall, the overarching waste legislation in Serbia can be assessed as sufficiently equivalent to the EU's.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Serbia provided information indicating that the legal framework imposes certain obligations on operators, including the requirement for monitoring and the development of risk management plans to address incidents and accidents.

The country's application contained data on yearly number of inspections being conducted, including regular field and office inspections and the issuance of reports on compliance.

The application indicated that these inspections are based on an Annual work Plan and extraordinary inspections, but should supply further information on the overall inspection and enforcement strategy and how the various enforcement agencies (customs, police, environmental inspectors) cooperate.

Additionally, the information provided on the follow-up to instances of non-compliance remains limited, showing that, for some cases where conditions for imports of waste were not met, the consequence was that the import was not authorised, but without any additional measures apparently taken.

Penalties are outlined in the Waste Management Act for three violations, including substantial fines for legal entities and responsible individuals. However, no specific information was provided on the number, levels and types (ie fines, suspension of permits, closure of facilities...) of penalties actually applied. Further information should be provided in order to assess their effectiveness to deter illegal practices.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Serbia has ratified the Basel Convention and all other multilateral agreements in Annex VIII of the WSR.

The country complies with the reporting obligations under the Basel Convention and no other issues were detected.

For the remaining 13 agreements, Serbia overall complies with its reporting obligations.

Overall, Serbia fulfils its relevant international commitments.

XXIV.2 Waste type specific assessment

The application informed on permitting requirements, preventive and resource-efficiency measures, comprehensive standards for landfill operation, and strict controls on waste characterisation and compliance. The application also detailed procedures for ongoing monitoring, closure, and post-closure care of landfills, underscoring a commitment to environmental protection throughout the waste management process. The application of Serbia lacks some information on the proportion of the wastes concerned by the request that is recycled.

The application contains detailed explanations on pollution control measures applying to various waste management operations, notably regarding ferrous and non-ferrous metal waste and paper waste. For metal waste, points of attention remain regarding requirements for stable shredder feed, energy efficiency records, environmental risk reduction in waste storage and handling, and quality controls for scrap materials and dust emissions. While some measures were mentioned, comprehensive legal obligations covering all these areas could be further elaborated.

Finally, concerning emission limit values for the treatment of ferrous metal waste, Serbia provided evidence that all key pollutants are monitored and controlled, for most of those pollutants quantitative limit values were indicated that remain comparable to those applied in the EU.

Specifically regarding mineral waste, the application of Serbia outlined a regulatory framework for waste management that emphasises record-keeping for energy and materials, optimised water use, prevention of wastewater, and adherence to national treatment standards. This approach supports effective resource monitoring, minimises environmental impact, and enforces compliance with operational and environmental requirements. However, legal requirements concerning stable shredder feed, energy

efficiency planning, environmental risk reduction in waste storage and handling, control of waste quality, and comprehensive measures for the prevention and reduction of diffuse dust emissions are only partially addressed, and scrap acceptance criteria and detailed dust control strategies are could be further specified.

Specifically regarding waste tyres, Serbia has a regulated framework for waste tyre management, with rules stipulating that waste tyres must not be landfilled but rather recycled or used for energy recovery. Legislation requires that at least 80% of collected waste tyres are recycled, with no more than 20% utilised for energy production.¹⁸ In 2021, official statistics recorded the processing of 50,736 tonnes of waste tyres, including 148 tonnes imported, and only 19 tonnes landfilled.¹⁹

The application addressed several key requirements but could further specify what pollution control measures and associated emission limits are applied for industrial facilities processing waste tyres, especially in small and medium facilities. No comprehensive legal obligation for all installations to maintain both Energy Efficiency Plans and Energy Balance Records was demonstrated and there is insufficient evidence of mandatory use of specific best available techniques for organic compound reduction and for all required environmental risk reduction measures in waste storage and handling; explicit validation, verification, and staff competence protocols for waste handling are not fully detailed.

Despite these formal requirements and reported quantities, several sources indicate ongoing issues with enforcement and practical implementation.^{20,21} Notably, a proportion of municipal waste, including tyres, continues to be disposed of illegally, with an estimated 3,500 illegal landfill sites across the country, many containing waste tyres. These sites pose environmental risks due to contamination from improper disposal. Weak or inconsistent enforcement of regulations, limited municipal capacity to impose penalties, and the absence of a landfill tax to incentivize recycling have been cited as reasons for continued illegal dumping.²²

Overall, while Serbia's legal framework for waste tyre management is well-defined, but the persistence of illegal dumping and enforcement challenges undermine its effectiveness.

XXIV.3 Serbia: conclusions

Serbia submitted an application to import ferrous metal waste, non-ferrous waste, mineral waste, waste tyres and paper waste.

¹⁸ [Batrićević, A. and Stanković, V. \(2020\) Waste Tires in Serbia – Source of Pollution or Recyclable Material?](#)

¹⁹ [Republic of Serbia \(2022\) Waste Management in the Republic of Serbia in the Period 2011–2021](#)

²⁰ [Balkan Green Energy News \(2019\) Waste management in Serbia – problems, challenges, and possible solutions](#)

²¹ [Balkan Green Energy News \(2022\) Garbage dumps on Serbia are quietly poisoning its citizens](#)

²² [Serbia Business \(2024\) Serbia's waste management crisis: Annual losses of 100m due to insufficient recycling](#)

As a result of this assessment, Serbia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for mineral waste, rubber waste, ferrous and non-ferrous metal waste and paper waste.

In addition, the Commission services emphasise the need for the authorities from Serbia to further demonstrate, in particular, which measures are being taken to ensure the implementation of their strategy to improve waste management, as well as the application of enforcement measures to ensure that waste shipment and management operations are carried out in compliance with the legislation. Although mineral waste and rubber waste are included in the List, the assessment also points to the need for more information to confirm that the environmental sound management of these waste streams imported from the Union is ensured in the country.

Annex XXV: Sri Lanka

Sri Lanka submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Sri Lanka to provide additional information. Sri Lanka provided more information on 29 November 2025 and 19 January 2026.

The application of Sri Lanka referred to plastic waste under Basel codes B3010 and B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Sri Lanka.

The application submitted by Sri Lanka covers 14 groups of eligible types of waste, namely

- ferrous metal (B1010, B1040, B1250 (ferrous components of waste end-of-life motor vehicles, containing neither liquids nor other hazardous components), B1200, B1210, B1220, B1230 and B2090),
- non-ferrous metal (B1010, B1040, B1250 (non-ferrous components of waste end-of-life motor vehicles, containing neither liquids nor other hazardous components), B1020, B1030, B1031, B1050, B1060, B1070, B1080, B1100, B1115, B1140, B1150, B1160, B1170, B1180, B1190, B1240 and B2110),
- waste batteries and catalysts (B1090, B1120, B1130),
- paper waste (B3020 and B3027),
- waste from pre-treatment of composite packaging (B3026),
- wood waste (B3050),
- rubber waste (B3040, B3080 and B3140),
- textile waste (B3030, B3035, B3090, B3100 and B3110),
- organic and agro-food (B3060, B3065, B3070 and B3130),
- mineral waste (B2010, B2040, B2050, B2060, B2070, B2080, B2100, B2130),
- acidic waste (B2120 (waste acidic or basic solutions with a pH greater than 2 and less than 11,5, which are not corrosive or otherwise hazardous)),
- glass waste (B2020)
- ceramics waste (B2030) and
- waste paint, dyes and inks (B3120, B4010, B4020).

XXV.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Sri Lanka provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

Sri Lanka provided data regarding the annual quantity of total waste generated in the country but did not provide more detailed data on the quantities of generated waste covered

by the request. Sri Lanka also provided an estimate of the country's treatment capacity for waste in general, as well as how this figure is going to develop in the following 10 years.

The National Environmental Action Plan 2022–2030 serves as the national policy and planning instrument, setting priorities, targets, and institutional responsibilities based on consolidated data from government agencies, sectoral expert groups, stakeholder consultations, and internationally aligned methodologies.

Sri Lanka has set objectives and measures to increase the rate of separately collected waste and decrease the rate of landfilled waste, such as strengthening nationwide waste segregation and collection systems, expanding composting and recycling capacity, introducing centralised biogas facilities, and promoting the establishment of additional waste recovery and disposal infrastructure.

To address littering, Sri Lanka took measures to prevent and clean up litter, including through national policy objectives under the National Action Plan on Plastic Waste Management to significantly reduce land-based plastic leakage, nationwide clean-up and awareness initiatives such as the “Clean Sri Lanka” programme, regular coastal and community-led clean-up campaigns, the provision of waste-disposal infrastructure in sensitive areas, education and behaviour-change activities, and the planned introduction of Extended Producer Responsibility provisions for plastics and e-waste through amendments to the National Environmental Act.

Sri Lanka provided data on the overall quantity of imported waste into the country, as well as the quantity of the waste covered by the request to import. Moreover, on the possible mitigation measures to reduce the impact of imported waste on the management of domestically generated waste, Sri Lanka provided extensive information on regulatory and permitting controls, national planning, and enforcement of legal actions.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

In Sri Lanka, establishments involved in the generation, collection, transport, storage, recycling, recovery or disposal of waste are required to obtain a permit. The permitting system includes the maintenance of an official register of authorised operators.

Sri Lanka provided convincing information on a set of legislative measures demonstrating that air, water, and soil are protected through a structured legal framework. For air protection, Sri Lanka has legislation prohibiting open burning, regulating emissions from waste storage and transport, and requiring air-pollution-control equipment for waste-treatment facilities. For water protection, Sri Lanka presented municipal, provincial, and project-approval laws that prevent waste discharge into water bodies, require leachate and stormwater controls, mandate wastewater-treatment systems, and impose monitoring obligations. For soil protection, Sri Lanka provided legislation regulating landfilling, requiring liners and remediation measures, prohibiting illegal dumping, and mandating restoration of contaminated sites. Finally, Sri Lanka overall monitors and controls the emission limits for key pollutants.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Sri Lanka adequately demonstrated their enforcement efforts, including through establishing periodic monitoring frequencies set by the competent authority through permitting systems, a structured and systematic environmental inspection regime, the possibility of non-routine inspections in cases of non-compliance, prohibitions and penalties for littering and illegal dumping, periodic inspections of waste management operators, inspections of collection and transport operations covering the origin, nature, quantity and destination of waste, monitoring of emissions with recording for compliance verification, and measures to address incidents or accidents with environmental or health impacts, including the suspension of operations where serious risks arise.

Regarding the import of non-hazardous waste, Sri Lanka stated that the PIC procedure is not required; nevertheless, it applies general information and control requirements for each transboundary movement, including via electronic means. With respect to the export of waste covered by the request, Sri Lanka indicates that the Prior Informed Notification procedure applies only to specific types of Annex IX waste. For other Annex IX wastes, the same regulatory approach as for imports is followed. Sri Lanka provided comprehensive information demonstrating a level of environmental protection comparable to that ensured by the PIC procedure.

Sri Lanka provided a document with the List of Collectors of Non-Hazardous/Non-Contaminated Recyclable Material (Updated up to 30.09.2025). The list included the company names and addresses, the permit numbers of these facilities, and type of waste treated by those facilities, but not their treatment capacities.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Sri Lanka has ratified the Basel Convention. All other multilateral agreements have been ratified and integrated into domestic legislation and policies.

The country complies with the reporting obligations of the Basel Convention and the latest submitted report dates from 2023. No issues were observed regarding compliance with other obligations under the Convention.

As regards the other international agreements, Sri Lanka provided website links to the national reports, which are regularly submitted. No issues were observed regarding compliance with other obligations under these agreements.

Overall, Sri Lanka fulfils its relevant international commitments.

XXV.2 Waste-stream specific assessments

Glass waste

Sri Lanka did not provide data on generation and the treatment capacity for the glass waste concerned by its request. It also did not provide data on the proportion of waste recycled and disposed of in their country.

Sri Lanka provided information on the regulation of pollution control in the context of the treatment of glass waste, demonstrating coverage of air emission control, including heavy metals, dust, dioxins and furans, and PCBs, with the use of scrubbers and filters. However, the framework significantly lacks specific provisions for controlling input materials, reducing metal emissions, and applying filtration or material control during glass melting processes.

Paper waste

More data should be gathered on generation and the treatment capacity for the paper waste concerned by its request. The application also did not provide data on the proportion of waste recycled and disposed of in their country.

Sri Lanka provided information that demonstrates that it has a comprehensive permitting framework for the management of paper waste. The framework covers detailed permit content requirements, periodic permit renewal supported by mandatory inspections, prohibitions on operation without authorisation, and clear obligations for definitive closure and after-care, particularly for landfills and hazardous-waste facilities, which is relevant for the management of residual waste after recycling.

The regulatory framework further covers preventive operational measures, basic waste characterisation aligned with Basel Convention guidelines, annual compliance checks through licence renewal, breakdown prevention measures, and the use of independent laboratories for waste testing and classification. Air protection measures addressing dust emissions are also identified. However, the framework does not set explicit landfill waste acceptance criteria supported by a structured characterisation and testing hierarchy, nor does it prohibit the landfilling of separately collected waste intended for reuse or recycling or the dilution or mixing of waste to meet admissibility criteria. In addition, no provisions are presented on residue recycling, kiln-specific emission controls, substance input management, or quality-assurance requirements for waste used in kilns. Moreover, not all key pollutants related to paper waste residues' treatment are mentioned.

While the information provided confirms the application of best available techniques for wastewater treatment, environmental risk reduction in waste storage, handling and transfer through mandatory Environmental Protection Licences, controls on channelled dust emissions from non-kiln operations, and breakdown-prevention obligations requiring the suspension or reduction of operations under abnormal conditions, Sri Lanka's legal framework does not sufficiently address energy efficiency or energy consumption reduction, minimisation and recycling of solid waste, water reuse impacts, VOC emissions from paper processing, or comprehensive controls on kiln operations, including substance input management, residue treatment and dust-emission reduction under defined operating conditions.

Rubber waste

More data on the generation and the treatment capacity for the rubber waste concerned by the request should be gathered. The application also did not provide data on the proportion of waste recycled and disposed of in their country.

Specifically regarding waste tyres, research showed that the management of such waste has been on the Sri Lankan government's agenda since at least 2005. Technical Guidelines on Used Tyre Management were issued covering collection, storage, fire prevention, reuse, recycling, and user responsibilities. The need to address health and environmental impacts from incomplete tyre burning and improper disposal was recognised politically, and directives were addressed to all local authorities under the National Environmental Act (NEA) to streamline tyre management.

Typical treatment methods for waste tyres and rubber waste are co-processing and pyrolysis. There is however no data on the total amount of such waste or the number of waste tyres in circulation.

Evidence mentions that large open dumpsites, highlighting the Meethotamulla Dumpsite in Colombo, are active in received waste.

Overall, Sri Lanka indicated that it implements a regulatory framework for waste tyre handling and processing, but limited quantitative data is available on actual processing levels. The existence and risks of open dumpsites, including catastrophic collapses, remain an important point of attention.

Ferrous metal waste and non-ferrous metal waste and battery waste

Specifically for ferrous and non-ferrous metal waste, Sri Lanka's regulatory framework addresses pollution control aspects, including binding air emission limits for dust, metals, dioxins, and furans, wastewater treatment and discharge standards, and measures to prevent diffuse dust emissions during storage, handling, and transport.

However, the regulatory framework insufficiently includes essential provisions on energy efficiency, such as requirements for a stable shredder feed, energy efficiency plans, or energy balance records. Also, specific measures are insufficient on scrap quality control or on the safe storage and separation of end-of-life vehicle components.

Specifically for batteries and catalyst waste, the application did not demonstrate equivalent standards for the treatment of non-hazardous battery waste, the removal of batteries from waste appliances, or measures to prevent diffuse emissions during scrap pre-treatment.

Wood waste, textile waste, organic and agro-food waste, mineral waste, acidic waste, ceramics waste and waste paint, dyes and inks

The information provided regarding the current and expected generation and capacity to treat the wastes concerned can be assessed as acceptable, and the robustness of data collection and management should be preserved in the near future.

For the eligible types of waste covered by the request of Sri Lanka, other than paper and packaging waste, the overview provided of Sri Lanka's legal framework for permitting and pollution control in the waste management sector includes preventive measures against pollution and accidents, efficient resource use, emission monitoring, and reporting obligations and can be assessed as sufficiently demonstrating equivalence.

Sri Lanka explained the general pollution control measures it takes, including emission limits for heavy metals, dust, dioxins and furans and PCBs, requirements for air pollution control equipment, wastewater management and treatment standards, and authorisation-based controls to reduce environmental risks from waste storage, handling and transfer. Controls are also presented for emissions of HCl, chlorine and HF from thermal treatment. However, important points of attention remain. The framework should be reinforced in respect of provisions on energy efficiency, including stable shredder feed conditions, energy efficiency plans, energy balance records, separation techniques to increase recovery of secondary materials, or energy-efficient practices in secondary copper production – all of these elements being particularly relevant for metal and battery waste. Overall, all key pollutants relevant to the treatment of the wastes concerned are covered.

Specifically for wood waste and organic waste, Sri Lanka implements a regulatory framework addressing operational controls during malfunction or abnormal conditions, air emission reduction measures for dust and hazardous pollutants, optimisation and treatment of wastewater using recognised techniques, and environmental risk mitigation in waste storage, handling, and transfer through mandatory licensing. Measures to reduce channelled dust emissions from non-kiln operations are also identified. However, the framework does not address biomass waste combustion plants, energy efficiency planning, or specific controls for waste use in kilns.

Specifically for textile waste, Sri Lanka demonstrated that it implements a regulatory framework covering emission control of dust, metals, organic compounds, and ammonia, monitoring of wastewater using BAT, and water protection measures. Waste storage, handling, and transfer are regulated through Environmental Protection Licences, with preventive actions required during equipment malfunctions. However, the framework may be improved on energy efficiency, quality assurance and control of textile waste processing, emission reduction from high-temperature operations, and maintaining stable feed in shredders or similar equipment, to address the limits of the management approach for textile waste.

Waste from pre-treatment of composite packaging (B3026)

The following non-hazardous waste from the pre-treatment of composite packaging for liquids, is considered under entry B3026:

- Non-separable plastic fraction
- Non-separable plastic-aluminium fraction

The management of plastic waste faces serious environmental and human health challenges, notably in countries to which the OECD Decision does not apply, where standards and infrastructure for the management of plastic waste are, in most cases, not as developed as in the EU.

It is important to note that the EU has prohibited the export of plastic waste to non-OECD countries, whereas waste covered by entry B3026 is in fact plastic waste.

The information provided by Sri Lanka indicated that measures have been taken to progressively reduce imports of plastic waste. At the same Sri Lanka took measures to prevent and clean up litter, including through national policy objectives under the National

Action Plan on Plastic Waste Management to significantly reduce land-based plastic leakage, but challenges remain.

In light of the above, the export of the waste covered by entry B3026 is not considered appropriate in respect of the EU's policy to not export waste challenges, notably related to plastic waste.

XXV.3 Sri Lanka: conclusions

Sri Lanka submitted an application to import ferrous metal waste, non-ferrous metal waste, waste batteries and catalysts, paper waste, waste from pre-treatment of composite packaging, wood waste, rubber waste, textile waste organic and agro-food waste, mineral waste, acidic waste, glass waste, ceramics waste and waste paint, dyes and inks.

As a result of this assessment, Sri Lanka

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for the following types of waste as covered by its request: wood waste, textile waste, organic and agro-food waste, mineral waste, acidic waste, ceramics waste and waste paint, dyes and inks, glass waste, paper waste and rubber waste.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for composite packaging waste, ferrous metal waste and non-ferrous metal waste.

Annex XXVI: Taiwan

Taiwan submitted its application on 11 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Taiwan to provide additional information. Taiwan provided such information on 5 August 2025.

The application of Taiwan refers to plastic waste under Basel codes B3011, as well as to e-waste (GC010) that may fall under Basel codes A1181 or Y49.

According to Article 39(1) points (a) and (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries, thus such waste were not considered when assessing the application of Taiwan.

The application submitted by Taiwan covers six specific types of waste, eligible under Title IV of the WSR: ferrous metal waste under Basel entries B1010 and B1200, non-ferrous metal waste under Basel entries B1010, B1030, B1031, B1080, B1100, B1120, B1130 and B1150, waste cables (B1115), waste catalyst (B1120, B1130 and GC050), paper waste (B3020) and textile waste (B3030).

XXVI.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application of Taiwan provided in its request sufficient and high-quality information. Taiwan provided annual figures for total waste generation, distinguishing between industrial, general and regulated recyclable waste, and presents consistent five-year averages that demonstrate stable national production. The application of Taiwan also indicated that waste generation across all categories is expected to remain stable over the next decade.

The application of Taiwan also gave an estimate of its current treatment capacity for general waste, supported by official statistical data and a well-defined methodology to collect data that distinguishes between recycling, incineration and landfill operations. These figures show that sufficient capacity is available and that such capacity is ensured for the next decade.

For the main categories of recyclable domestic waste, the application of Taiwan provided precise proportions for separate collection, with paper, metal, automobiles, plastic and glass forming the core fractions collected at scale. The application of Taiwan also outlined a set of legally established measures that sustain and improve separate collection, including mandatory waste separation at the source and approved waste management plans for designated facilities.

The application of Taiwan further outlined several strategic objectives and measures aimed at decreasing the rate of landfilled waste, including national action plans that prioritise resource recycling, circular economy development and value-added waste treatment. The

application of Taiwan also reported a very low landfill rate for industrial waste, which remains currently under 1%. At the same time, objectives and measures are in place to enhance recycling efficiency, maximise the recovery of valuable resources and reduce dependence on primary raw materials.

The application of Taiwan adequately presented comprehensive measures to prevent and address littering, including as regards enforcement measures.

Finally, the application of Taiwan provided excellent quantitative information on annual waste imports, supported by a methodology to collect and validate data based on Customs Statistics and the Industrial Waste Report and Management System. It also presented a comprehensive framework to assess the impact of these imports, requiring full integration of imported waste into the national industrial waste management system and linking import volumes to the authorised capacity of its waste management system. Taiwan further implements extensive reporting, tracking and verification obligations from the point of import through to final treatment, ensuring that imported waste is managed in an environmentally sound manner and does not exceed domestic treatment capacity.

Overall, the application of Taiwan regarding the national waste management strategy can be assessed as adequately demonstrating equivalence with the EU's requirements on that.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Taiwan adequately demonstrated that it implements specific permit requirements for waste treatment facilities, specified per specify waste types/quantities, site technical requirements, safety, operations, monitoring, and closure. Taiwan further specified its permit requirements, specifically for landfill projects that must meet technical, safety, and financial conditions; inspections before operation are implied within the regulatory framework controlling facilities.

The application of Taiwan did not mention any provision relating to the total organic carbon content in slag or bottom ash from incineration plants, or that gases from incineration or co-incineration must be raised to 850°C for two seconds or any similar requirement.

The application of Taiwan did correctly provide information on their permitting system for waste transport as well as on its register of establishments carrying and/or transporting waste.

The application of Taiwan provided explanations on how they regulate the ESM of residual waste.

The application of Taiwan comprehensively provided a list of legislation on pollution controls for waste treatment, and described its controls on water, air, and soil. While there is no requirement for facilities to develop or maintain energy efficiency plans or energy balance records and it is not clear what quality control systems are implemented for the waste used in rotary kilns, more in general Taiwan requires that measures are taken at facility level to reduce emissions of key substances, such as dust, heavy metals, dioxins and furans, SO_x and NO_x.

The application of Taiwan provided a list of legislation entailing general information on protection of the environment and human health. The information submitted demonstrated that national legislation is in place.

The application of Taiwan correctly provided explanations on their applicable procedures on import and export of waste, laid down in the Waste Disposal Act.

Finally, the application of Taiwan provided a detailed explanation of relevant legal provisions on enforcement, inspections, and penalties.

The application of Taiwan regarding its waste management and environmental legal framework can be assessed as adequately demonstrating equivalence with the EU's requirements on that.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Taiwan provided evidence that it has implemented robust measures to ensure the environmentally sound management of the waste concerned by the request.

The application of Taiwan correctly provided a list of legislation it has in place for both inspections and penalties and described its content in a satisfactory way for the assessment. Moreover, it provided information on the application of the legislation, such as the number of inspections conducted annually, and the penalties applied in case of infringements.

Overall, the application of Taiwan provided an acceptable insight in its implementation and enforcement measures regarding waste shipments and management.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

The application of Taiwan provided evidence that it complies with obligations under the Basel Convention. Taiwan further stated that it complies with the reporting obligations under the Stockholm Convention on Persistent Organic Pollutants, the Minamata Convention on Mercury, and the UN Framework Convention on Climate Change and Paris Agreement.

Concerning the other international agreements, Taiwan represents a particular case, being highly influenced by China's foreign policy. Nonetheless, The application of Taiwan has explained its decision to incorporate these multinational agreements into national legislations.

Overall, Taiwan can be assessed as largely fulfilling its relevant international commitments.

XXVI.2 Waste-stream specific assessments

The application of Taiwan provided a detailed description of its current and expected generation and capacity to treat, paper waste and textile waste. The application of Taiwan also provided an adequate overview of its legal framework for permitting and pollution control in the waste management sector, including preventive measures against pollution and accidents, efficient resource use, emission monitoring, and reporting obligations. For textile and paper wastes, the application of Taiwan sufficiently explained the measures it takes to reduce air emissions of heavy metals, dust, dioxins and furans, and PCBs, including continuous emission monitoring and the use of best available techniques, and the information provided refers to key pollutants relevant to the treatment of such wastes.

However, the application of Taiwan failed to provide essential information on the requirements related to the treatment of metal waste. These include:

- conditions for maintaining a stable shredder feed,
- implementation of energy efficiency plans considering that metallurgical treatment is highly energy-intensive,
- robust measures to control scrap quality,
- strong measures to minimise the contamination and release of toxic pollutants, (heavy metals, PCBs, HF, Cl₂, etc.) in air, soil and wastewater,
- reduction of dust emissions from slag and electric arc furnace processes.

The application of Taiwan specified that organisations permitted to import industrial waste are categorised as disposal or reuse organisations, while clearance organisations are licensed to handle transportation. The application of Taiwan provided publicly accessible platforms, such as the WCDS and RMS, where lists of authorised organisations can be queried, including details of their names, permits, the types of waste they are authorised to receive or transport, and, for reuse organizations, maximum monthly recycling capacities, waste sources, purposes, and equipment.

Taiwan provided publicly accessible lists of authorised waste management facilities and organisations, including details of their names, permits, the types of waste they are authorised to receive or transport, and, for reuse organizations, maximum monthly recycling capacities, waste sources, purposes, and equipment.

XXVI.3 Taiwan: conclusions

Taiwan submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste and textile waste.

As a result of the assessment above, Taiwan

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation, for **paper waste and textile waste**.
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

Annex XXVII: Thailand

Thailand submitted its application on 14 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Thailand to provide additional information. Thailand provided more information on 16 December 2025 and 15 January 2026.

The application submitted by Thailand covers 4 specific eligible types of waste, namely ferrous metal waste, non-ferrous metal waste, paper waste and rubber waste. The application specifies these types of waste with the following customs codes:

- Ferrous metal waste: B1010, B1040, B1250;
- Non-ferrous metal waste: B1010, B1050, B1120;
- Paper waste: B3020;
- Rubber waste: B3040 (specified by HS codes 4003.00.00 and 4005.10.90)

XXVII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Thailand provides sufficient information on its national waste management strategy and plan, as further described below. The country categorises waste data reporting only into four main types: municipal solid waste, hazardous waste, industrial waste and infectious waste. It is therefore not able to provide specific quantities of the waste concerned by the request generated in the country.

Thailand provided an estimate of the total quantity of waste generated in the country, and explained that the overall trend of waste generation continues to increase. For the year 2037, the country anticipates that municipal solid waste generation alone will reach ca. 29 million tons per year.

Thailand provided an estimate of the national treatment capacity, focusing on industrial waste treatment facilities, amounting to approximately 103 million tons per year. However, at present, there has been no study or assessment regarding the development of treatment capacity for industrial waste, nor any evaluation of trends or projected changes in such capacity over the next 10 years.

It indicated that the proportion of separately collected waste for the main domestic waste categories amounts to ca. 9 million tons, representing 34% of the total municipal solid waste generated, which is ca. 26 million tons.

The application of Thailand indicated that metal waste, paper waste and rubber waste can continue to be recovered and will not be disposed of by landfilling, implying therefore that the landfilling rate is 0%, although more information on the source should be provided.

Thailand's application indicated that it sets ambitious goals and actively promotes increased waste recycling in line with national measures and policies. The application

indicated that no illegal dumping of metal, rubber and paper wastes occurs, as these waste streams retain economic value, and remain in demand within industrial sectors. However, the estimate of total recycled waste is not provided, and in particular for waste types that cannot be recovered or reused, addressing illegal dumping continues to be a point of attention. Available data indicate that the quantity of illegally dumped waste is ca. 0.2 million tons. More information should be provided on the measures implemented to prevent and clean up litter.

The application further explained that waste imports must be directly usable as raw materials in industrial production without requiring quality improvement or the separation of mixed waste. Additionally, Thailand has measures in place to inspect and monitor industrial waste management, along with laws controlling pollution emissions from factories, including wastewater, air pollution, and industrial waste. The application of Thailand further explained that for the non-hazardous waste categories covered in the request, there is currently no specific legislation regulating their import. Nevertheless, when such waste is recycled in industrial facilities, it must be managed in an environmentally sound manner and in compliance with the Factory Act and other relevant regulations. Therefore, more information should be provided to fully demonstrate that waste imported into the applicant country's territory will be managed in accordance with environmental protection standards similar to those found in the EU, and that the management of imported waste will not negatively impact the management of domestically generated waste.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Thailand highlighted that entrepreneurs wishing to collect and transport general waste must apply for a license to operate a general waste collection and transportation business under the Public Health Act. For vehicles transporting hazardous substances classified as chemical waste, a separate license for the possession and transportation of hazardous substances is required from the Department of Industrial Works. These requirements indicate that establishments are subject to a registration or licensing process with the competent authority before they can legally carry waste. The application also details a licensing system and specifies that the Department of Industrial Works and other authorities oversee and inspect facilities and operators managing waste, including through registration and licensing. The application mentioned the monitoring of compliance. However, more information should be supplied to underpin this, such as regarding the maintenance of a register of all waste transport establishments in the country.

Thailand's application indicated that it maintains a risk-based environmental inspection system, with regular and targeted checks prioritising high-risk sites and waste management operators. Inspections are both scheduled and conducted in response to suspected non-compliance, with authorities empowered to prescribe remedial actions and, if necessary, suspend or revoke licences where serious risks are identified. The framework also prohibits littering and illegal dumping, enforcing penalties such as fines and imprisonment and regularly reviewing these measures for effectiveness. All waste collection, transport, and facility operations are regulated through registration or licensing, ensuring traceability via

detailed manifests. Additionally, facilities must monitor and report emissions to demonstrate compliance with environmental standards, supporting comprehensive oversight that includes customs checkpoints and ongoing compliance verification.

Thailand's application provided a comprehensive overview of its legislative framework for the protection of water, air, and soil. Thailand has established clear legal measures to control air emissions from factories. The legislation sets limits for the concentration of pollutants in air emissions, requires the installation of air-pollution control systems in industrial facilities, and mandates regular inspection and reporting by the authorities. Thailand's legislative framework includes specific standards for wastewater discharge from factories, including pulp and paper mills, and defines the characteristics of wastewater that can be discharged. Thailand's legal framework for soil protection includes the definition of contamination thresholds in soil and groundwater, requirements for soil and groundwater quality checks, and the reporting of assessment results.

Thailand's application provided sufficient information on its domestic legislation on the import and export of waste. It specified that before import, export, and transit of hazardous wastes to other member states, prior notification must be given to the Department of Industrial Works, and the transboundary movement can only begin once consent and movement documents from the state parties have been obtained. However, Thailand did not fully elaborate on the final step of the PIC procedure, namely 'confirmation of waste treatment'.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Thailand's application provided a comprehensive legislative framework governing inspections related to waste management in Thailand. Key acts include the Factory Act, Public Health Act, Hazardous Substances Act, and the National Environmental Quality Promotion Act. These statutes establish the authority for routine, random, and targeted inspections, empower officials to enter premises, examine documentation, collect samples, and assess compliance with environmental and safety requirements. The legislation also mandates risk-based inspection planning and coordination between relevant agencies at border checkpoints and seaports. However, no specific case studies indicative number of inspections conducted are provided.

Concerning the legislative framework for penalties, the application specified administrative and criminal penalties, including fines, imprisonment, and license revocation for violations such as operating without a license, providing false information, or failing to comply with official orders. However, more information should be gathered on the practical enforcement of penalties. The application notes that penalties are actively imposed, including administrative orders to suspend or improve operations, closure of non-compliant facilities, revocation of licenses, and prosecution for illegal disposal or unauthorised transport of hazardous waste. However, no specific case studies or indicative number of penalties imposed are provided.

Thailand's application showcases a robust and risk-based environmental inspection system, with regular and targeted checks prioritising high-risk sites and waste management operators. Inspections are both scheduled and conducted in response to suspected non-

compliance, with authorities empowered to prescribe remedial actions and, if necessary, suspend or revoke licences where serious risks are identified. All waste collection, transport, and facility operations are regulated through registration or licensing, ensuring traceability via detailed manifests. Additionally, facilities must monitor and report emissions to demonstrate compliance with environmental standards, supporting comprehensive oversight that includes customs checkpoints and ongoing compliance verification.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Thailand has ratified the Basel Convention, and 11 of the 13 remaining multilateral agreements, as it has not ratified the Freedom of Association and Protection of the Right to Organise Convention, and the Right to Organise and Collective Bargaining Convention. However, the country explained that it is currently in the process of considering their ratification through the Ratification Steering Committee.

Thailand appears compliant with the reporting obligations of the Basel Convention and the other multilateral agreements it has ratified.

Thailand's application demonstrated a strong commitment to the environmentally sound management of hazardous waste and other wastes, as outlined by the Basel Convention, through a comprehensive regulatory framework, regular reporting, and international cooperation. National laws and regulations govern waste handling, pollution control, and facility licensing, while risk-based inspection systems and strict penalties ensure compliance. The country's approach aligns well with the principles and overall framework of the Basel Convention, including the control of transboundary movements.

XXVII.2 Waste-stream specific assessments

For the waste streams concerned by the request, the application adequately provided the treatment capacities, the proportion of domestic waste concerned by the request that is landfilled and recycled, and information on the quantity of waste concerned by the request that is imported. However, more information is needed on the annual quantity of waste concerned by the request generated in the country, as well as 10 years projections on how much waste concerned by the request will be generated in the country. Furthermore, the application does not provide 10 years projections of the country's treatment capacity for the waste concerned by the request.

The application provided an overview of Thailand's legal framework for permitting of waste treatment facilities. Nonetheless, there is no explicit mention of a formal process for periodic renewal or reconsideration of permits. The closure conditions or post-closure obligations for waste management facilities should be further elaborated. The present requirements for incineration or co-incineration plants should be clarified regarding permit content, operational standards, emission limits, minimum operating temperatures, and organic carbon limits. Landfill permitting procedures and operational standards are outlined but additional technical specifications for different types of waste treatment facilities should be provided.

The application presented the country's legal framework for the management of residual waste resulting from the treatment of the waste concerned by the request. Thailand's application emphasised that their policies prioritise the recovery of waste as a first option, in accordance with the waste management hierarchy, prior to any final disposal. Accordingly, Thailand's application underlined that this waste is not intended for landfilling or other forms of final disposal.. However, more detail is needed regarding landfill waste acceptance criteria, procedures for landfill operator compliance, a ban on waste dilution or mixing, operational monitoring and after-care procedures for landfills, the approach to systematic waste characterisation and testing, requirements for independent laboratory testing, and limit values for co-disposal of certain wastes.

The country's application described the measures to control and limit pollution during the treatment of waste subject to the request. Specifically, the country demonstrated that it has requirements for environmental risk reduction in waste storage, handling, and transfer, as well as air pollution control standards. Thailand mandates authorisation, documentation, and pollution control measures for storage, and requires licensing and inspection for safe handling and transfer. Air emissions, including dust and metals, are regulated under existing standards. Furthermore, Thailand's application referred to the monitoring of a wide range of pollutants in its facilities, such as particulate matter, hydrogen chloride, hydrogen fluoride, carbon monoxide, sulphur dioxide, nitrogen oxides, dioxins/furans, mercury, various heavy metals, total suspended solids, and chemical oxygen demand. However, more information should be provided on the legal requirements for comprehensive energy efficiency planning, and specific water-saving or recirculation practices. The regulation of wastewater treatment does not reference best available techniques (BAT), nor are there detailed procedures for scrap quality management to minimise pollution and enhance recovery of metal waste nor targeted measures to prevent wastewater pollution load from paper mills.

More specifically for ferrous and non-ferrous metal waste, Thailand's application remains insufficient because it did not fully address the management of residual waste resulting from recovery operations. While Thailand indicated that metal scrap is intended for recovery in line with the waste hierarchy and not for final disposal, residual waste arising from recovery operations is nevertheless expected to be landfilled. In this respect, the application does not provide sufficient detail on landfill waste acceptance criteria, procedures for landfill operator compliance, a ban on waste dilution or mixing, operational monitoring and after-care procedures, systematic waste characterisation and testing, requirements for independent laboratory testing, or limit values for the co-disposal of certain wastes.

Thailand's application is also insufficient for ferrous and non-ferrous metal waste, as it does not clearly demonstrate a sufficiently comprehensive set of measures to control and limit pollution during treatment. The application shows that requirements exist for environmental risk reduction in waste storage, handling, and transfer, and that air emissions, including dust and metals, are regulated. It also refers to monitoring of a broad range of pollutants, including particulate matter, hydrogen chloride, hydrogen fluoride, carbon monoxide, sulphur dioxide, nitrogen oxides, dioxins/furans, mercury, various heavy metals, total suspended solids, and chemical oxygen demand.

However, important gaps remain. The framework does not include explicit legal requirements for comprehensive energy efficiency planning or specific water-saving or recirculation practices, and wastewater regulation is not linked to BAT. It also lacks detailed procedures for scrap quality management to minimise pollution and enhance recovery. For ferrous metal waste, no targeted measures are described to prevent diffuse dust emissions. For non-ferrous metal waste, the application additionally does not demonstrate measures to guarantee increased recovery of secondary materials through separation techniques. Finally, Thailand does not mention monitoring of total volatile organic compounds (TVOC), leaving a gap in the coverage of relevant pollutants.

The application provided a list of companies "expressing their intention to import non-hazardous waste from EU". The list includes the name and address of the facilities, the factory registration number, and the types of waste concerned by the request that the facilities are authorised to recover. However, more information on the authorised treatment capacities should be provided.

XXVII.3 Thailand: conclusions

Thailand submitted an application for ferrous metal waste, non-ferrous metal waste, paper waste and rubber waste.

As a result of the assessment above, Thailand

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for paper waste and rubber waste
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Thailand to further demonstrate, in particular, which measures are being taken to ensure sufficient available treatment capacities for each waste streams, the implementation and enforcement of rules regarding the permitting of waste treatment facilities and the practical enforcement of penalties as well as to ensure that pollution linked to waste management facilities for the requested waste is being properly monitored and mitigated, including through emission limits of all key pollutants.

Annex XXVIII: Togo

Togo submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Togo to provide additional information. Togo provided more information on 12 January 2026.

The application of Togo refers to plastic waste under Basel codes B3010 and B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such wastes cannot be exported from the EU to non-OECD countries after 21 November 2026, thus such waste were not considered when assessing the application of Togo.

The application submitted by Togo covers 3 specific eligible types of waste, namely ferrous metal waste, non-ferrous metal waste and paper waste.

XXVIII.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Togo's application only provided the annual quantity of total waste generated in the country, and how this quantity is expected to develop in the next 10 years, but did not distinguish by type of waste concerned by its request. Togo explained that it cannot provide such data as it is not available in the register or directory of the competent authority that only follows up on hazardous waste.

Togo provided a figure for the overall country's treatment capacity for waste, and how this is expected to develop in the next 10 years. However, it did not explain how this figure was calculated.

Similarly, Togo indicated the overall proportion of domestic waste that is separately collected, and its objective to increase the proportion of separately collected waste in the future. Also, here Togo did not clarify the methodology to achieve the proportion of domestic waste that is separately collected. Figures are lacking on share of domestically generated waste that is landfilled and recycled. Togo provided an overview of its objectives and measures to increase the recycling rate of the country in the future. However, the country does not have nationally disaggregated data on the proportion of waste that is separately collected recycled.

Togo indicated that it is discussing internally how to improve the statistical system in this sector and referred to the current decentralisation of governance occurring in the country.

Finally, Togo did neither provide figures on the quantity of waste imported into its territory nor explained satisfactorily the extent to which the import of waste will affect the management of domestically generated waste.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Togo does not require any establishment intending to carry the waste concerned by the request, to be registered by the competent authority, nor does it maintain a register of establishments that transport waste. This is explained by the fact that data is not available in the register or directory of the competent authority because waste codes B1010 and B3020 are not categorised as hazardous at the national level. Waste collection and transport operations are regulated insofar a waste is considered as hazardous or mixed with hazardous waste.

This implies that non-hazardous waste are not systematically regulated at the national level.

Togo's application provided an overview of its domestic legislation relevant to the protection of the environment and human health in the context of waste management operations. However, the application does not provide sufficient evidence of structured frameworks or specific measures broadly comparable to EU standards. In particular, regarding air pollution legislation, while the application has provided some references to legislation aimed at securing air quality, it lacks comprehensive details to demonstrate a legal framework comparable to EU benchmarks.

Similarly, as regards water pollution and soil pollution legislation, Togo has established relevant legislation but does not provide sufficient evidence of structured frameworks or specific measures comparable to EU standards.

As regards the import and export of the waste concerned by the request, Togo's response indicated that it does not apply the prior informed consent procedure for non-hazardous waste but subjects those shipments to national requirements. These requirements are not further specified or explained.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Togo's application does not provide adequate information on several critical aspects of the implementation of its legal framework for waste management. Specifically, it does not clarify whether the frequency of periodic environmental monitoring is set by the competent authority for each installation through permits or general rules. There is also no evidence of a structured and systematic system for environmental inspections that would enable comprehensive assessment of all relevant impacts at each installation. Furthermore, the application lacks information on procedures to address incidents or accidents that may significantly affect human health or the environment. It also remains unclear if there are provisions for suspending the operation of installations in cases of immediate danger until compliance is restored.

Togo overall does not provide clear evidence that inspections and penalties are in place.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Togo has ratified the Basel Convention as well as the remaining 13 multilateral agreements in Annex VIII of the WSR.

Based on the information available on the Basel Convention website, it is unclear whether Togo complies with its reporting obligations in due time: countries should report annually, at the end of the calendar year. However, the last report that Togo submitted was in 2018, for the year 2016. No issues were observed regarding compliance with the remaining obligations.

Also for other agreements, such as the Stockholm Convention and the Paris Agreement, Togo does not meet its reporting obligations.

The compliance with remaining obligations was checked and no other issues were observed.

XXVIII.2 Waste-stream specific assessments

For ferrous metal waste and non-ferrous metal waste, please refer to section 2.3.

Togo did not provide data on the annual amounts generated for the waste concerned by its request. It also did not explain how the treatment capacities for paper waste are determined or estimated.

Togo did not provide an adequate overview of its legal framework for permitting treatment facilities. Togo provided a list of legislation concerning waste management in general, and explains that any waste treatment facility or operation is subject to an environmental and social impact assessment, after which an environmental compliance certificate is issued. However, it is unclear whether this corresponds to a permit. The application does not make reference to permitting, licensing or registration system(s) for waste treatment facilities.

Togo's submission lacks cohesion and detail regarding its legal framework for the management of residual waste resulting from the treatment of ferrous metal waste. Reporting obligations are referenced in relation to international agreements (Basel Convention) but permit content requirements such as specific emission limits and monitoring frequencies are not explained.

In its application, Togo does not clearly demonstrate what are the measures to control and limit pollution during the treatment of ferrous metal waste. Togo described the actors and activities involved in waste recovery and recycling, including NGOs, operators of pre-collection services, voluntary community operators, neighbourhood associations, and informal waste collectors and sorters. However, Togo does not address any of the specific requirements for the environmentally sound management of waste that would evidence equivalence with EU benchmarks. For instance, there is no mention of technical requirements, specific techniques implemented for increasing energy efficiency, reducing air emission, water optimisation, wastewater treatment using BAT, environmental risk reduction in storage or handling, control of scrap quality, or prevention of diffuse dust emissions.

Concerning emission limits, Togo indicated that the country does not have its own standards. Togo generally uses World Health Organisation (WHO) standards for emission limits, or otherwise, World Bank and European Union standards are also applied. However, this does not constitute specific numerical emission limits. Togo mentioned that it checks for BOD and COD levels, but does not mention other relevant substances such as heavy metals, dust, dioxins and furans, VOC, SO₂, HCl, HF, or other relevant substances in the case of paper waste, namely total suspended solids (TSS) and adsorbable organically bound halogens (AOX).

Finally, no list of specific treatment facilities as required by Annex VIII of the WSR is provided.

XXVIII.3 Togo: conclusions

Togo submitted an application to import ferrous metal waste, non-ferrous metal waste and paper waste.

As a result of the assessment above, Togo could not be recommended for inclusion in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised, according to Article 41 of the Waste Shipment Regulation.

Annex XXIX: Tunisia

Tunisia submitted its application on 20 February 2025 and corrected it shortly after.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Tunisia to provide additional information. Tunisia provided more information on 21 November 2025 and 9 January 2026.

The application of Tunisia referred to non-hazardous plastic waste classified under code B3011. According to Article 39(1) point (d) of the EU Waste Shipment Regulation, such waste cannot be exported from the EU to non-OECD countries, thus such waste was not considered when assessing the application of Tunisia.

The application of Tunisia also referred to e-waste classified under codes B1110, GC010 and GC020. This type of waste is since 1 January 2025 classified under codes A1181 and Y49 and is, according to Article 39(1) points (a) and (c) of the EU Waste Shipment Regulation, not allowed to be exported from the EU to non-OECD countries, thus such waste was also not considered when assessing the application of Tunisia.

The application submitted by Tunisia covered 8 types of waste, eligible under Title IV of the WSR:

- Ferrous metal waste: B1010;
- Non-ferrous metal waste: B1010, B1020, B1080, B1100;
- Mineral waste: B2040, GG030, GG040;
- Paper waste: B3020;
- Textile waste: B3030;
- Rubber waste: B3040, B3080, B3140 (waste pneumatic tyres);
- Organic and agro-food waste: B3060;
- Ceramic waste: GF010.

XXIX.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

The application refers to the National Strategy for Ecological Transition and the National Waste Management Strategy, containing objectives and measures relevant for waste management in the short, medium and long terms. However, additional information should be supplied on the indicators for achieving progress towards its objectives.

The application indicated the annual quantity of total waste generated in the country. It also provided an estimate of the country's current treatment capacity for waste in general, and an estimate for the waste concerned by the request as a whole but not distinct per waste type. The treatment capacity is equal to the quantities of generated waste in general and concerned by the request. The estimated total amount of waste treatment capacity over the next ten years is not provided.

The application adequately provides the estimated proportion of waste that is separately collected, i.e. between 7 and 10%. However, further information is needed on separately collected domestic waste. The application indicates that separate waste collection is currently not mandatory in Tunisia, but that initiatives are planned to promote selective sorting and separate waste collection, including a draft decree and municipal initiatives, as outlined in the national strategy.

The country's National Waste Management Strategy (SNTE) includes the objective of reducing landfilling by 2050, through reforming of household wastes' treatment methods, namely by establishing new waste treatment and recovery facilities.

The application provides information on the proportion of the waste in general that is recycled as well as estimated proportions for the wastes concerned by the request, specifying that all types of wastes have an approximative recycling rate between 15 and 20%, and for organic wastes 10%.

The application also includes an estimation of the quantity of littered waste, i.e. 300,000 tons annually. The application does not provide the quantity of waste that is imported. To ensure that imported waste is managed in an environmentally sound manner, it indicates that the importation of hazardous waste is prohibited and that it only allows waste for which there is a dedicated treatment facility.

The sources of the data mentioned above and the methodologies to collect and validate them should be further elaborated.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Regarding the description of the permitting, licensing or registration systems for transport of waste, the application indicates that non-hazardous waste transport companies are subject to the granted terms and conditions approved by the National Agency of Waste Management. In addition, regarding the maintenance of a register, the application indicates that the Ministry of Environment (via the ANGED portal) maintains registers of authorised companies.

Regarding other relevant legislation, the application provided adequate information on the legal framework for air quality, including laws and decrees that set emission limits, require clean technologies, and establish monitoring systems. Regarding water pollution, Tunisia has prohibitions on illegal dumping, requirements for secure landfill sites, wastewater treatment regulations, and controls on hazardous waste. As for soil pollution, Tunisia prohibits illegal dumping, regulates storage and burial, manages sewage sludge, and enforces liability for pollution, referencing the "polluter pays" principle.

Regarding domestic legislation on the import and export of the relevant waste, the application provides four pieces of legislation, indicating that imported and exported waste is subject to authorisation by the Minister in charge of Trade, unless the products are included in the 'freedom regime'. The application provides general references to authorisation of waste imports, prohibition of hazardous waste imports, and application of Basel Convention principles. However, it should be further explained how the domestic framework addresses notification, consent, movement documentation, financial guarantee, contractual requirements, or recovery-confirmation procedures.

See more elements in the section on specific waste assessments.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Regarding the strategy for the enforcement of domestic legislation, the application indicated that environmental monitoring and inspections are conducted and that inspectors survey waste management operations. Nevertheless, additional detail should be gathered to fully assess the legal framework for inspection planning, spot checks on shipments/recovery, or mandatory document/identity/physical checks of waste.

Regarding the implementation of inspections, the application indicated that companies are inspected annually and that controls are systematically done in permitted facilities. However, relevant data should be collected on numbers, frequencies, or results of spot checks on shipments or recovery facilities.

Regarding legislation on penalties, the application detailed a robust penalty framework under Law 96-41, including fines (e.g., 100–50,000 TND; 10,000–500,000 TND for serious hazardous-waste offences) and imprisonment (two months to five years), plus measures such as activity suspension or licence withdrawal. Further information could be provided regarding the implementation of penalties, such as statistics on numbers, amounts, or cases.

Regarding provisions on enforcement, inspection and penalties, the application demonstrated that there are relevant legal and procedural measures in place for the regular monitoring, inspection, and enforcement of waste management activities. This includes structured inspections, penalties for illegal dumping, provisions for emissions monitoring, and enforcement actions such as fines, imprisonment, and suspension of operations in cases of serious breaches.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Tunisia has ratified the Basel Convention and 12 of the 13 other relevant multilateral agreements. It has not ratified, but it has signed, the Minamata Convention on Mercury. However, the application does not explain the reason(s) why it has not ratified this Convention.

Tunisia complies with the Basel Convention's reporting obligations. The country has not reported under the Stockholm Convention.

XXIX.2 Waste-stream specific assessments

Ferrous metal waste and non-ferrous metal waste

Concerning ferrous and non-ferrous metal waste, the application provides an acceptable level of information on Tunisia's national waste management strategy and plan. In particular, it includes the estimated annual quantity of ferrous and non-ferrous metal waste

generation and the proportion of domestic ferrous and non-ferrous metal waste that is landfilled. However, the application does not include 10 years projections for the waste generation, due to a 'lack of data'. Concerning mineral waste, the application provides an acceptable level of information on its national waste management strategy and plan. However, it falls short of providing the estimated annual quantity of mineral waste generated.

The permitting system covers basic environmental standards, but key requirements are missing or unclear. Permits do not show evidence of systematic inclusion of essential elements such as soil/groundwater protection, maintenance rules, abnormal-operation procedures, or compliance assessments. There is no requirement for periodic permit updates. Landfill and waste-treatment permits are mentioned but remain high-level, lacking detail on technical, safety, monitoring, and closure conditions.

The application is insufficient regarding provisions on the management of residual waste as it lacks or only partially provided crucial information regarding specific permit conditions, including requirements for efficient resource use or emission limits. .. Additionally, there is insufficient detail on landfill waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations. The application also omits requirements for documentation checks, bans on mixing or landfilling separately collected waste intended for recycling, and comprehensive frameworks for emission monitoring and landfill operation.

Also regarding provisions on pollution controls, the application lacks information on stable shredder feed requirements, energy efficiency measures, and comprehensive emission reduction techniques. The application provides only partial details or omits specifics related to water and wastewater management, environmental risk reduction in storage and handling, scrap quality control, and dust emission abatement. Limit values for air pollutants from stationary sources, and limit values and alert thresholds for ambient air quality are referenced. Furthermore, the application refers to legislation that establishes emission limits for various pollutants, including examples such as heavy metals, dust, SO₂ and NO_x. These emission limit values are however systematically 5 to 10 times higher than the higher limit values applied in the EU.

Please also refer to section 2.3.

Mineral waste and ceramic waste

Concerning mineral waste, the application provides an acceptable level of information on its national waste management strategy and plan. However, more information should be provided on the estimated annual quantity of mineral waste generated.

The permitting system overall covers necessary environmental standards. Permits are required for landfill and waste treatment. More information should elaborate on the following elements: soil/groundwater protection, maintenance rules, abnormal-operation procedures, compliance assessments, detailed technical, safety, monitoring, and closure conditions. The requirement for periodic permit updates should be further addressed.

The application describes Tunisia's provisions on the management of residual waste, including general permit conditions. However, more information is needed to fully assess

requirements for efficient resource use, emission limits, landfill waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations. Also, information on the requirements for documentation checks, bans on mixing or landfilling separately collected waste intended for recycling, and comprehensive frameworks for emission monitoring and landfill operation should be gathered.

The application outlined Tunisia's general provisions on pollution controls regarding water and wastewater management as well as environmental risk reduction in storage and handling. However, the application lacks information on scrap quality control, dust emission abatement, stable shredder feed requirements, energy efficiency measures, and comprehensive emission reduction techniques, which are critical for metal waste streams. . Limit values for air pollutants from stationary sources, and limit values and alert thresholds for ambient air quality are referenced. Furthermore, the application refers to legislation that establishes emission limits for various pollutants, including examples such as heavy metals, dust, SO₂ and NO_x.

Paper waste and textile waste

Concerning paper waste and textile waste, the application provides an acceptable level of information on Tunisia's national waste management strategy and plan. In particular, it includes the estimated annual quantity of waste generation and the proportion of domestic waste that is landfilled. However, the application does not include 10 years projections for the waste generation, due to a 'lack of data'.

The same as for the waste streams mentioned above, the application generally described Tunisia's permitting conditions for waste collection and treatment. However, further information should be provided, especially on requirements for efficient resource use, emission limits, waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations.

The application generally described the country's provisions on the management of residual waste, including some permit requirements (such as for environmental protections and monitoring) However, additional information is needed on landfill acceptance, bans on landfilling recyclable or separately collected waste, protocols for waste testing and quality assurance, and provisions for ongoing monitoring, compliance checks, and emission control measures.

Regarding pollution controls for paper waste, the application provided general information on requirements and measures for energy efficiency, reduction of energy and air emissions, adoption of best available techniques (BAT) in waste management and paper production, optimization and control of water usage and wastewater treatment, protocols for solid and hazardous waste minimization, and standards for environmental risk reduction in storage, handling, transfer, and kiln operations, but more details should be gathered. Regarding pollution controls for textile waste, the application also provided the general waste management requirements. Nonetheless, additional information should be collected as regards energy efficiency plans, specific emission reduction technologies for organic compounds, dust, or ammonia, detailed BAT wastewater treatment obligations, and requirements for waste characterization or quality assurance.

As mentioned above for other waste streams, the application refers to legislation that establishes emission limits for various pollutants. However, specific quantified emission limits (such as numerical values for particular substances) should be further elaborated.

Rubber waste

Concerning rubber waste, the application provides an acceptable level of information on its national waste management strategy and plan. However, further information should be provided on the estimated annual quantity of rubber waste generated.

The same as for the waste streams mentioned above, the application generally described Tunisia's permitting conditions for waste collection and treatment and management of residual waste. However, further information should be provided, especially on requirements for efficient resource use, emission limits, waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations.

Regarding pollution controls, the application provided general information on several aspects of environmental and waste management requirements, including the implementation of specific energy efficiency and air emission reduction techniques, water and wastewater management practices, environmental risk reduction measures in storage, handling, and kiln operations, but more details should be gathered.

As mentioned above for other waste streams, the application refers to legislation that establishes emission limits for various pollutants. However, specific quantified emission limits (such as numerical values for particular substances) should be further elaborated.

Finally, the handling and final destination of re-exported waste tyres was not fully addressed.

Organic and agro-food waste

Concerning organic and agro-food waste, and other organic waste, the application provides an acceptable level of information on its national waste management strategy and plan. In particular, it includes the estimated annual quantity of waste generation and the proportion of domestic waste that is landfilled. However, the application does not include 10 years projections for the waste generation, due to a 'lack of data'.

The same as for the waste streams mentioned above, the application generally described Tunisia's permitting conditions for waste collection and treatment and management of residual waste. However, further information should be provided, especially on requirements for efficient resource use, emission limits, waste acceptance criteria, operational monitoring, closure procedures, and after-care obligations. The application described the country's general provisions on the management of residual waste. However, more information should be provided on efficient resource use, permit requirements (such as environmental protections and compliance checks), landfill management, waste testing and acceptance procedures, monitoring and closure of landfills, and recycling requirements. The application did not fully address independent testing, setting of limit values, or specific measures for controlling emissions from incineration and kiln operations.

Regarding pollution controls, the application provided general information on energy efficiency, monitoring and control of waste and emissions, use of abatement technologies, safe operation of composting and digestion, water use and treatment, quality assurance for kiln waste treatment, and proper procedures for waste handling, storage, and transfer. However, more detailed information should be provided on the foregoing elements.. As mentioned above for other waste streams, the application refers to legislation that establishes emission limits for various pollutants. However, it did not provide specific quantified emission limits (such as numerical values for particular substances).

XXIX.3 Tunisia: conclusions

Tunisia submitted an application to import ferrous metal, non-ferrous metal, mineral, paper, textile, rubber, and organic waste.

As a result of the assessment above, Tunisia

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for mineral waste, ceramic waste, paper waste, textile waste, rubber waste and organic and agro-food waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Tunisia to further demonstrate, in particular, which measures are being taken to ensure on the implementation of its waste management strategy, its permitting system, to ensure environmental protection and monitoring of waste treatment installations, as well as to ensure enforcement and penalties in case of non-compliance.

Annex XXX: Ukraine

Ukraine submitted its application on 20 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Ukraine to provide additional information. Ukraine provided such information on 19 September 2025. Following a second request for additional information from the Commission, Ukraine shared additional information on 9 January 2026.

The application submitted by Ukraine covered 11 groups of waste types, eligible under Title IV of the WSR:

- Ferrous metal: B1010, B1200, B1230;
- Non-ferrous metal: B1010, B1070, B1100;
- Paper waste: B3020;
- Wood waste: B3050;
- Rubber waste: B3040, B3080, B3140 (Waste pneumatic tyres);
- Textile waste: B3030;
- Organic and agro-food waste: B3060;
- Mineral waste: B2010, B2040, B2050, B2060;
- Glass waste: B2020;
- Ceramic waste: B2030;
- RDF (Refuse-derived fuel): 191210 (combustible waste), 191212 (other wastes, including mixtures of materials, from mechanical treatment of wastes)

XXX.1 Generic assessment

- a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU*

Overall, Ukraine provided comprehensive and sufficiently detailed information on its national waste management strategy and plan.

Ukraine provided updated national data indicating that the total annual waste generated amounts to approximately 246.8 million tonnes, with a breakdown by key categories. Ukraine also provided detailed figures on the expected trends in waste generation over the next ten years. Ukraine provided quantitative estimates of current treatment capacities for waste in general, as well as qualitative projections of future capacity development based on the National Waste Management Plan. The submission clarifies that existing treatment capacities exceed domestic waste generation, and outlines expected trends and strategic priorities for each waste category. Ukraine provided a list of the amount of collected waste, both in tonnes and as a proportion of the total amount collected from households. It indicated measures and objectives to increase the amount of separately collected waste. All of these are accompanied with a description of the methodology used to calculate these figures.

Ukraine provided a comprehensive description of the measures undertaken and planned to reduce the quantity of waste landfilled. These include specific quantitative targets, legal instruments, and infrastructure development plans, as well as bans on landfilling certain

waste types. Finally, Ukraine described a comprehensive set of ongoing and planned measures aimed at eliminating illegal dumpsites and bringing existing landfills into compliance with EU standards. These measures include the closure and reclamation of non-compliant sites, construction of new regional landfills, introduction of stricter technical requirements, implementation of economic instruments such as landfill taxes and “pay-as-you-throw” schemes, and the establishment of digital monitoring systems. Ukraine also provided information on measures and goals to increase recycled waste in the future.

Ukraine provided the proportion of littered waste and detailed information on measures taken to prevent and clean up litter. It reported the identification of 13,000 unauthorised dumpsites in 2023, of which 12,500 were eliminated, and described ongoing national efforts to improve waste collection, transportation, and recycling infrastructure. The country also outlined future plans to close non-compliant landfills and to build new waste treatment facilities, alongside awareness-raising initiatives aimed at promoting sustainable waste management practices and ensuring cost recovery through tariffs.

Ukraine reported the total quantity of imported waste and the methodology used to calculate import volumes. Ukraine also provided a comprehensive strategy to ensure the environmentally sound management of imported waste and to prevent adverse impacts on domestically generated waste. The strategy includes measures for permit issuance, import supervision, inspection, and enforcement, as well as economic mechanisms based on the polluter-pays principle and extended producer responsibility. Furthermore, Ukraine detailed initiatives for infrastructure expansion, investment in circular economy solutions, and public awareness campaigns to guarantee that imported waste is managed in an environmentally sustainable manner.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

Ukraine provided a detailed description of the regulatory framework governing the transport of non-hazardous waste, including applicable licence and registration requirements, the competent authorities involved, and the legal acts underpinning these obligations. While no specific environmental permit is required solely for waste transport, operators must hold a road freight transport licence, register in the State Waste Management Register, and comply with vehicle registration and technical inspection standards.

The country demonstrated a comprehensive national legal framework addressing air, water, and soil protection in line with EU environmental standards. The Law on the Protection of Atmospheric Air establishes emission control mechanisms applicable to waste treatment activities. Water protection is ensured through the Water Code of Ukraine, which provides for integrated river basin management and pollution prevention in line with the EU Water Framework Directive. Soil protection is addressed through the Law on Environmental Protection, complemented by waste management and landfill regulations that establish liability, restoration obligations, and measures to prevent soil contamination.

Ukraine’s submission sets out a clear and comprehensive legal framework governing the import and export of waste in line with Article 6 of the Basel Convention. Article 43 of the Law on Waste Management and Cabinet of Ministers Resolution No. 1067 (2024) establishes a complete prior informed consent system, covering notification, written consent, authorised movement, and accompanying documentation. The framework

regulates all stages of transboundary waste movements, requires verification during transport, and limits the validity of approvals to one year, ensuring full traceability and control in accordance with international standards.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

Ukraine provided a comprehensive description of the legal framework governing inspection planning and the execution of state supervision measures, including references to the relevant legislation and institutional responsibilities. Ukraine also supplied quantitative data on inspection activities conducted in 2020–2021, as well as the number and type of penalties imposed for infringements, including administrative fines and criminal proceedings. Furthermore, it clarified that under Martial Law, all planned and unplanned inspections have been suspended, though some unscheduled inspections have been authorised by ministerial decisions since 2022.

Ukraine's application demonstrated a comprehensive and well-structured enforcement framework covering permitting, monitoring, inspection, and sanctioning of waste management activities. The competent authorities define monitoring frequencies, require continuous and periodic emission monitoring with record-keeping, and operate a risk-based inspection system allowing both routine and non-routine inspections. The legal framework prohibits illegal dumping, provides for effective, proportionate, and dissuasive penalties, and allows for the suspension or revocation of permits where serious environmental or health risks arise. Measures for incident management and emergency response are foreseen, and systematic verification of waste collection, transport, and treatment operations ensures effective compliance control.

d) Ratification of listed multilateral agreements and compliance with obligations under listed multilateral agreements

Ukraine confirmed that it has ratified the Basel Convention. The application provided evidence that the country complies with the reporting obligations of the Basel Convention, and additional desk research did not identify any issues concerning the implementation of other obligations. Furthermore, Ukraine provided detailed explanations of how all other multilateral agreements have been integrated into domestic legislation and government's actions. National reports are regularly submitted.

XXX.2 Waste-stream specific assessments

For each of the waste streams concerned by the request, Ukraine provided an estimate of the annual quantity of waste generated in the country, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, an estimate of the country's treatment capacity, and 10 years projection of the country's treatment capacity, the proportion of domestic waste concerned by the request that is landfilled, and the proportion of domestic waste concerned by the request that is recycled. For ferrous metal, non-ferrous metal, paper, textile, organic and agro-food, glass, and ceramics waste, this confirmed that the treatment capacity is higher than the amount of

waste generated. However, for wood waste, rubber waste, and mineral waste, it remains a point of attention whether sufficient treatment capacity is available.

Concerning RDF, Ukraine's an estimate of the annual quantity of waste concerned, as well as information on how the quantities of such waste generated in the country will develop in the next 10 years, and an estimate of the country's treatment capacity for the waste concerned by the request, and 10 years projection of the country's treatment capacity for such waste. However, Ukraine's application does not provide the proportion of RDF that is landfilled and nor the proportion of RDF that is recycled.

Ukraine's response is excellent when it comes to overview of relevant treatment facilities, as it provided two documents with a list of competent facilities and the required information. In fact, Ukraine provided the names and addresses of the facilities, their permit numbers, the types of waste they are authorised to receive, and their annual treatment capacity.

Ferrous metal waste, non-ferrous metal waste, mineral waste, glass waste, ceramic waste

Ukraine provided a comprehensive and detailed legal framework for the permitting of waste treatment and disposal facilities. Waste Treatment Operations Permits require extensive information on authorised waste types and quantities, technical processes, operational capacity, responsible personnel, and, where applicable, Environmental Impact Assessment conclusions. Permits specify site-specific technical, safety, and monitoring requirements, as well as conditions for closure and post-closure care supported by financial guarantees. Landfill permitting is subject to stringent requirements, including Environmental Impact Assessments (EIA), technical competence, pre-operational inspections, and detailed operational and monitoring conditions. While permit reviews are triggered by changes in operations rather than fixed intervals, the forthcoming integrated environmental permitting regime – which Ukraine is planning to introduce – is expected to introduce periodic reconsideration in line with EU standards.

The legal framework as presented by Ukraine establishes preventive measures against pollution and accidents, detailed permit requirements, strict landfill waste acceptance criteria, and binding operational, monitoring, closure, and after-care obligations. Waste characterisation, transfer documentation, annual reporting, and the use of qualified laboratories for monitoring and testing are required, ensuring a high level of environmental control. However, the framework provided does not explicitly mention a ban on the dilution or mixing of waste to meet admissibility criteria, nor does it establish limit values for granular non-hazardous waste co-disposed with hazardous waste.

Regarding pollution controls for ferrous and non-ferrous metals, the overview of the legal framework provided by Ukraine establishes extensive measures to reduce air emissions of heavy metals, dust, dioxins and furans, PCBs, and other key pollutants, supported by gas-cleaning technologies, emission limit values, and monitoring obligations. Water consumption and wastewater discharges are regulated through case-specific limits, pre-treatment requirements, and the promotion of closed-loop systems. Environmental risks related to waste storage, handling, and transport are addressed through permitting, licensing, and traceability requirements.

Regarding pollution controls for mineral waste, the overview of the provided legislative framework ensures energy and water optimisation, the application of BAT for wastewater treatment, and effective controls on air emissions, including dust, metals, dioxins, and PCBs. It also provides environmental risk reduction in the storage, handling, and transfer of waste, alongside measures to limit mercury, dioxin, and PCB emissions from sinter strand operations. Key pollutants relevant to mineral waste are covered. However, Ukraine does not provide requirements to ensure a stable shredder feed for efficient energy use, nor specific provisions to prevent and reduce diffuse dust emissions arising from the storage, handling, and transport of waste.

Regarding glass waste, the legislative framework provided ensures the reduction of air emissions, including dust, metals, dioxins, and furans, in glass recovery and melting processes. Facilities are required to implement gas-cleaning equipment, monitor metal-specific emission limits, and control raw material quality, including chemical composition, homogeneity, and radioactivity. Key pollutants relevant to glass waste are covered.

The framework provided for ceramics waste ensures the reduction of air emissions, including dust, metals, dioxins, and furans, through the use of gas-cleaning equipment such as bag filters and scrubbers. Key pollutants relevant to ceramics waste are covered.

Paper waste, wood waste, rubber waste, RDF

The legal framework provided establishes comprehensive permitting requirements for waste treatment, incineration, co-incineration, and landfill operations, including detailed permit content, operational conditions, monitoring obligations, and closure and after-care measures. Operations without a valid permit is prohibited, and permits are subject to reconsideration when operations change, with further alignment expected under the forthcoming integrated permitting regime. Specific provisions address incineration performance, emission control, and landfill safety and management. However, the framework does not explicitly require a minimum waste gas treatment temperature of at least 850°C for a defined residence time.

The overview of the legal framework provided establishes preventive measures against pollution and accidents, detailed permitting requirements, strict landfill waste acceptance criteria, and binding obligations for operational monitoring, closure, and after-care. It also requires waste characterisation, testing, annual compliance reporting, and the use of qualified laboratories, and includes measures to reduce dust emissions and control emissions from kiln operations. However, the framework does not explicitly address quality assurance for wastes used in kilns, a ban on dilution or mixing of waste to meet admissibility criteria, limit values for granular non-hazardous waste co-disposed with hazardous waste, breakdown prevention, or the recycling of incineration residues. While all key pollutants relevant to the treatment of residues of wood waste, rubber waste, textile waste and organic and agro-food waste are mentioned, it remains a point of attention that not all key pollutants relevant to treatment of residues of paper waste are mentioned.

The legal framework provided by Ukraine on pollution controls related to the treatment of paper waste, wood waste, rubber waste, and RDF demonstrates comprehensive coverage of resource efficiency, waste minimisation and recycling, air emission controls, water consumption optimisation, BAT-based wastewater treatment, and environmental risk

reduction in the storage, handling, and transport of waste. Integrated environmental permitting applies to major facilities, including kilns, with requirements on emissions control, monitoring, and dust abatement measures.

Regarding paper waste, more information should be gathered on specific measures for controlling soil, groundwater, dust, and wind drift from paper storage, reducing coating colour and binder loads in wastewater, ensuring quality assurance and appropriate treatment of wastes used in kilns, or regulating breakdown prevention.

Regarding RDF, the legal framework presented ensures energy efficiency, optimisation of water use, robust wastewater treatment using BAT, and environmental risk reduction in the storage, handling, and transfer of waste. Facilities are required to monitor and control emissions from kilns, non-kiln dusty operations, open-air composting, and anaerobic digesters. The legal framework further ensures preventive measures against pollution and accidents, detailed permit content requirements, control of emissions from kilns, and reduction of dust emissions from non-kiln operations. However, it remains a point of attention to specify which regulations are in place for addressing the malfunction or breakdown of abatement equipment, technical requirements for waste gas segregation or specific measures for the treatment and quality control of wastes used in kilns. Ukraine also did not provide regulations for breakdown prevention, technical requirements for recycling of incineration/co-incineration residues, or specific measures for the treatment and quality control of wastes used in kilns. Residues from RDF treatment are reported to be fully encapsulated within the clinker, and no residual waste is produced.

It is important to note that Article 44 (2)(f) of the WSR prohibits the export from the EU of mixed municipal waste collected from private households, from other waste producers or from both and that thereby also refuse-derived fuels processed from mixed municipal waste are referred to. It should be clear that the RDF considered in this assessment cannot be stemming from processing mixed municipal waste, in view of the above-mentioned prohibition to export such waste from the EU.

XXX.3 Ukraine: conclusions

Ukraine submitted an application to import ferrous metal waste, non-ferrous metal waste, paper waste, wood, rubber waste and waste tyres, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, and RDF (refuse-derived fuel-191210 and 191212).

As a result of the assessment above, Ukraine

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste, wood waste, paper waste, rubber waste and waste tyres, textile waste, organic and agro-food waste, mineral waste, glass waste, ceramics waste, and RDF (refuse-derived fuel).

Annex XXXI: Vietnam

Viet Nam submitted its application on 21 February 2025.

All required information under Part 1 of Annex VIII WSR was duly provided.

The Commission invited Viet Nam to provide additional information. Viet Nam provided more information on 13 November 2025 and 9 January 2026.

The application submitted by Viet Nam covers 4 specific eligible types of waste, namely ferrous metal waste, non-ferrous metal waste, glass waste and paper waste. The application specifies these types of waste with the following customs codes:

Ferrous metal waste:

- 72041000 (scrap and fragments of cast iron)
- 72042100 (scrap and fragments of alloy steel: stainless steel)
- 72042900 (scrap and fragments of alloy steel: others)
- 72043000 (scrap and fragments of tin-coated iron or steel)
- 72044100 (other scrap and fragments: turnings, shavings, fragments, scale, sawdust, etc.)
- 72044900 (other scrap and fragments: others)

Non-ferrous metal waste

- 74040000 (scrap and fragments of copper)
- 75030000 (scrap and fragments of nickel)
- 76020000 (scrap and fragments of aluminium)
- 79020000 (scrap and fragments of zinc)
- 80020000 (scrap and fragments of tin)
- 81110010 (scrap and fragments of manganese)

Glass waste

- 70010000 (broken glass and other glass scrap, excluding glass from cathode ray tubes or other active glass in group 85.49)

Paper waste

- 47071000 (kraft paper or kraft board or paper or board made from corrugated material, unbleached)
- 47072000 (other paper or board made primarily from chemically processed pulp that has been bleached, not fully dyed)
- 47073000 (paper or board made primarily from mechanically processed pulp)

For the purpose of establishing the list of countries in accordance to Article 41 of the Waste Shipment Regulation, the following corresponding Basel Convention entries are identified:

- Ferrous metal waste: B1010, B1200;
- Non-ferrous metal waste: B1010, B1030, B1031, B1080, B1100, B1150;
- Glass waste: B2020;
- Paper waste: B3020.

XXXI.1 Generic assessment

a) National waste management situation in the country and strategy to ensure the environmentally sound management of waste, including waste imported from the EU

Overall, the application of Viet Nam provided sufficient information on its national waste management strategy and plan in view of assessing the national waste management situation in the country.

The application of Viet Nam provided data regarding the annual quantity of total waste generated in the country (an estimated 50.2 million tonnes per year), as well as the quantities of generated waste covered by the request for 2024. The application of Viet Nam also estimated a 10-16% increase of waste generated annually over the next decade, and indicated as well that the demand for imported waste will increase.

The application of Viet Nam provided an estimate for the recycling capacity in its country of around 9.15 million tonnes in 2024, with an expected increase to 15 million tonnes in 2034. The application indicates that the amount of municipal waste generated in Vietnam was 24.77 million tonnes in 2023 and that the amount of industrial waste generated was 25 million tonnes/year. These figures show that the recycling capacities in the country are however not sufficient to recycle the waste covered by the request which is generated in Viet Nam.

The application of Viet Nam did not provide data on the proportion of separately collected waste. Waste in Viet Nam is separated on a voluntary basis by individuals, collected by freelance workers, and sold to collection facilities. The application of Viet Nam indicated that it has recently started to implement separate collection of waste at source in 2025 and will make this mandatory as part of its waste management strategy, namely through the 2020 Law on Environmental Protection.

In 2024, still 63% of waste is landfilled in Viet Nam. It was not clear from the information provided by the application of Viet Nam what share of the wastes concerned by the request are landfilled and recycling rates of the various waste types is not provided either.

More information should be gathered about Viet Nam's strategy for ensuring that imported waste is managed in an environmentally sound manner, covering strict permitting, environmental licensing, quality control through national technical standards, financial guarantees, and inspection/customs control.

The application provided a general overview of the sources used to collect data relating to waste management in the country, but without explaining the methodology followed to ensure the consistency of the data provided.

b) Domestic legal framework for environmental protection, waste management and on the import and export of waste

The application of Viet Nam referred to the 2020 Environmental Protection Law as the main framework providing requirements for waste management. Regarding air pollution, Viet Nam has a legal framework for air pollution control (2020 Law on Environmental Protection and a set of National Technical Standards with emission limits (including BATs), monitoring, and enforcement mechanisms. While it does not explicitly mention national reduction commitments for the five pollutants as in the NEC Directive, the structure and aims are aligned with EU requirements.

Regarding water pollution, Viet Nam has relevant legislation, including on standards for wastewater treatment and discharge, and applying the polluter-pays principle.

Regarding soil pollution, Viet Nam has a relevant legal framework, including prevention, remediation, and applying the polluter-pays principle. There is no explicit mention of the safe use of sewage sludge.

Viet Nam's application provided information regarding the procedure for the import and export of waste. The procedures implement elements in line with the Basel Convention but do not seem to require any confirmation of treatment of waste after the shipment arrived at destination.

Viet Nam does not require establishments transporting waste to be registered nor does it maintain a register of such establishments. The application indicated that monitoring is achieved through treatment facility oversight, handover records, and vehicle conformity requirements, not through a transporter registration system.

c) Implementation and enforcement of domestic legislation on waste management and waste shipment

The application of Viet Nam adequately demonstrated their enforcement efforts, detailing requirements for environmental monitoring and inspection, mechanisms for enforcing compliance—including both routine and non-routine inspections—and the imposition of penalties for violations such as littering, illegal dumping, and breaches of permit conditions. The information provided also covered obligations for facilities to monitor and report emissions, procedures for responding to environmental incidents or accidents, and enforcement measures such as fines and suspension of operations in cases of serious danger, all within a framework designed to ensure systematic oversight and effective deterrence.

Regarding the legislation on penalties, Decree No. 45/2022/ND-CP details specific fines for a multitude of violations related to waste management and waste imports, including large fines, forced re-export, and suspension of licenses. The Penal Code allows for criminal prosecution for severe violations, with fines up to 7 billion VND and imprisonment for individuals. The legal framework is designed to be effective, proportionate, and dissuasive.

Regarding the implementation on penalties, the application of Viet Nam provided a table of recent enforcement actions and penalties (2022–2024), including fines, forced re-export, and business suspensions. Examples include fines of up to 790 million Vietnamese dong

(VND) and over 2,300 cases fined a total of over 51 billion VND in Ho Chi Minh City in 2024.

d) Ratification of listed multilateral agreements and Compliance with obligations under listed multilateral agreements

Viet Nam has ratified the Basel Convention as well as most of the remaining 13 multilateral agreements in Annex VIII of the WSR. However, Viet Nam has not ratified the Freedom of Association and Protection of the Right to organise convention 1948. The application of Viet Nam thereby indicated that it regularly submits its reports and engages in a technical dialogue with the ILO's supervisory bodies.

Based on the information available on the Basel Convention website, it is unclear whether Viet Nam complies with its reporting obligations in due time: countries should report annually, at the end of the calendar year. However, the last report that Viet Nam submitted was in 2022, for the year 2020. No issues were observed regarding compliance with the remaining obligations.

As regards the UNFCCC and the Paris Agreement, Viet Nam meets its reporting obligations. The compliance with remaining obligations was checked and no other issues were observed.

XXXI.2 Waste-stream specific assessments

More information should be gathered on Viet Nam's treatment capacity for the waste concerned by its request. The application of Viet Nam provided an adequate overview of its legal framework and supplied comprehensive details on its environmental permitting system, encompassing requirements for permit content, periodic review, and closure procedures. This includes provisions for emission limits, monitoring, operational safety, closure and after-care, as well as specifications for both landfill and waste treatment facility permits, ensuring all relevant technical, environmental, and management criteria are addressed.

However, Viet Nam's legal framework could be improved through more comprehensive detailed measures on landfill waste acceptance and management, including specific criteria, operator obligations, prohibitions on landfilling recyclable waste, and requirements for testing and compliance. The legislation further lacks specific requirements and techniques for energy efficiency, material recovery, pollution control, and advanced waste treatment. More information could be gathered on which measures are in place for reducing hazardous emissions, conserving water, optimizing waste handling, or minimizing environmental risks beyond general obligations.

The application of Viet Nam provided emission limit values which are monitored for important parameters, namely heavy metals, dust, dioxins and furans, NO_x, SO₂. These emission limit values are however systematically higher than the higher limit values applied in the EU.

More specifically, Viet Nam's application remains insufficient for ferrous and non-ferrous metal waste. For ferrous metal waste, the application lacks information on requirements for stable shredder feed, legal obligations for energy efficiency planning, and comprehensive measures for reducing specific air and dust emissions. The documentation

is also incomplete or general on the optimisation of water and energy use, specific wastewater treatment techniques, detailed risk reduction practices in waste storage, handling, and transfer, quality control measures for scrap, and abatement techniques for diffuse dust emissions across storage, handling, and transport operations.

For non-ferrous metal waste, the application provides information on general pollution prevention obligations, compliance with national technical standards for air emissions and water quality, and safe storage and handling requirements. However, the legal framework remains lacking in specific requirements and techniques for energy efficiency, material recovery, pollution control, and advanced waste treatment. It also does not fully address measures for reducing hazardous emissions, conserving water, optimising waste handling, or minimising environmental risks beyond general obligations.

In addition, for both ferrous and non-ferrous metal waste, Viet Nam provides emission limit values monitored for important parameters, namely Cadmium, Mercury, Lead, Dust, PCDD/F, NO_x, and sulphur, but these limit values are systematically higher than the upper limit values applied in the EU.

XXXI.3 Concerns raised by environmental non-governmental organisations

Civil society organisations approached the European Commission, expressing concerns regarding the impacts of imported waste to the domestic waste management system in various countries. Regarding Viet Nam in particular, the concerns expressed covered:

- The recycling capacity in Vietnam, taking into account the increase of the amount of imported waste over the last few years and the likely increase in domestic waste collected for recycling under the new EPR requirements in Viet Nam.
- Specific challenges for metal recycling, as well as paper recycling.
- Challenges with enforcement, including to address illegal imports of waste, in particular via Free Trade Zones.

The European Commission invited Viet Nam to provide further additional information and clarifications on how the above-mentioned challenges are addressed in Viet Nam. Viet Nam provided a response on 29 January 2026.

In its response, the authorities in Viet Nam indicated that they have been progressively narrowing the scope of permitted imported waste and aim to gradually phase out waste imports and notably of plastic waste, in view of enhancing domestic waste collection and in the future ensure that domestic supply becomes sufficient to meet production demands in Viet Nam.

Vietnamese authorities also provided more information on the measures they are taking to strictly control imported waste, limit imports to only those waste types that are genuinely necessary for production and establish a clear timeline to phase out plastic waste imports. Vietnamese authorities further provided more information regarding the measures to promote recycling in the country, such as Extended Producer Responsibility regulations, source separation to improve waste collection and promotion of circular economy models in production and consumption to minimise waste and optimise the use of natural resources.

The response by the Vietnamese authorities explained how its paper industry has undergone substantial restructuring towards industrial-scale and more centralised production. New investments are predominantly large-scale industrial paper mills located in industrial zones with integrated technical and environmental infrastructure, while small, scattered facilities in residential areas have been gradually phased out. The response by Viet Nam underlines that the concerns by the civil society organisations regarding environmental and public health impacts, largely relate to isolated cases, small-scale operations or earlier periods.

Finally, the response by the Vietnamese authorities acknowledged the concerns regarding the risk of fraud, transshipment or illegal imports through Free Trade Zones but underlines that only qualified facilities are permitted to import waste and that shipments entering Free Trade Zones are subject to the same electronic customs supervision as domestic imports and must be accompanied by certificates of conformity with Vietnamese technical regulations issued by independent inspection bodies prior to customs clearance. Viet Nam has increased sanctions for illegal waste importation under its law, with maximum penalties of up to 10 billion Vietnamese dong (VND)- and 10-year's imprisonment for individuals, and up to 14 billion VND and permanent suspension of permits for legal entities.

XXXI.4 Viet Nam: conclusions

Viet Nam submitted an application to import ferrous metal waste, non-ferrous metal waste, glass waste and paper waste.

As a result of this assessment, Viet Nam

- **could be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for glass waste and paper waste;
- **should not be included in the first list of non-OECD third countries to which exports of certain non-hazardous EU waste are authorised**, according to Article 41 of the Waste Shipment Regulation for ferrous and non-ferrous metal waste.

In addition, the Commission services emphasise the need for the authorities from Viet Nam to further demonstrate, in particular, which measures are being taken to ensure sufficient capacity to manage imported waste on top of domestically generated waste, to implement a proper landfill waste management, and to ensure pollution control, including through strengthened emissions limit values of key pollutants.