



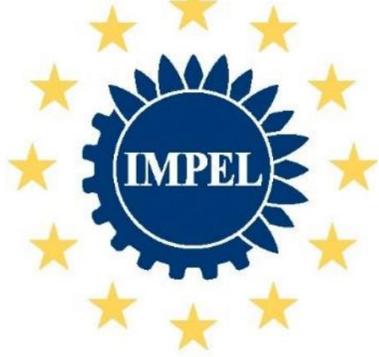
European Union Network for the Implementation and Enforcement of Environmental Law



Funded by the European Union

IMPEL





European Union Network for
the Implementation and Enforcement
of Environmental Law

IMPEL NETWORK

- The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL)
- An international non-profit organisation of **environmental authorities**
- Founded in **1992**. Legal seat in Brussels; website: <https://www.impel.eu>
- **59 members authorities** from **38 countries** including all EU MS
 - **Newest Members** – Ukraine, EPA of Montenegro, City of Linz, Austria
- **>1500 involved experts**



Mission

To contribute to protecting the environment by promoting the effective implementation and enforcement of EU environmental law.



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European Union



European Union Network for the
Implementation and Enforcement
of Environmental Law

5 Expert Teams

forums for the members in which they can develop projects, based on member needs that address key implementation gaps.

FIVE
THEMATIC
AREAS



INDUSTRY AND AIR



WASTE AND TFS



WATER AND LAND



NATURE PROTECTION



CROSS-CUTTING

Environmental law partners

European
Commission

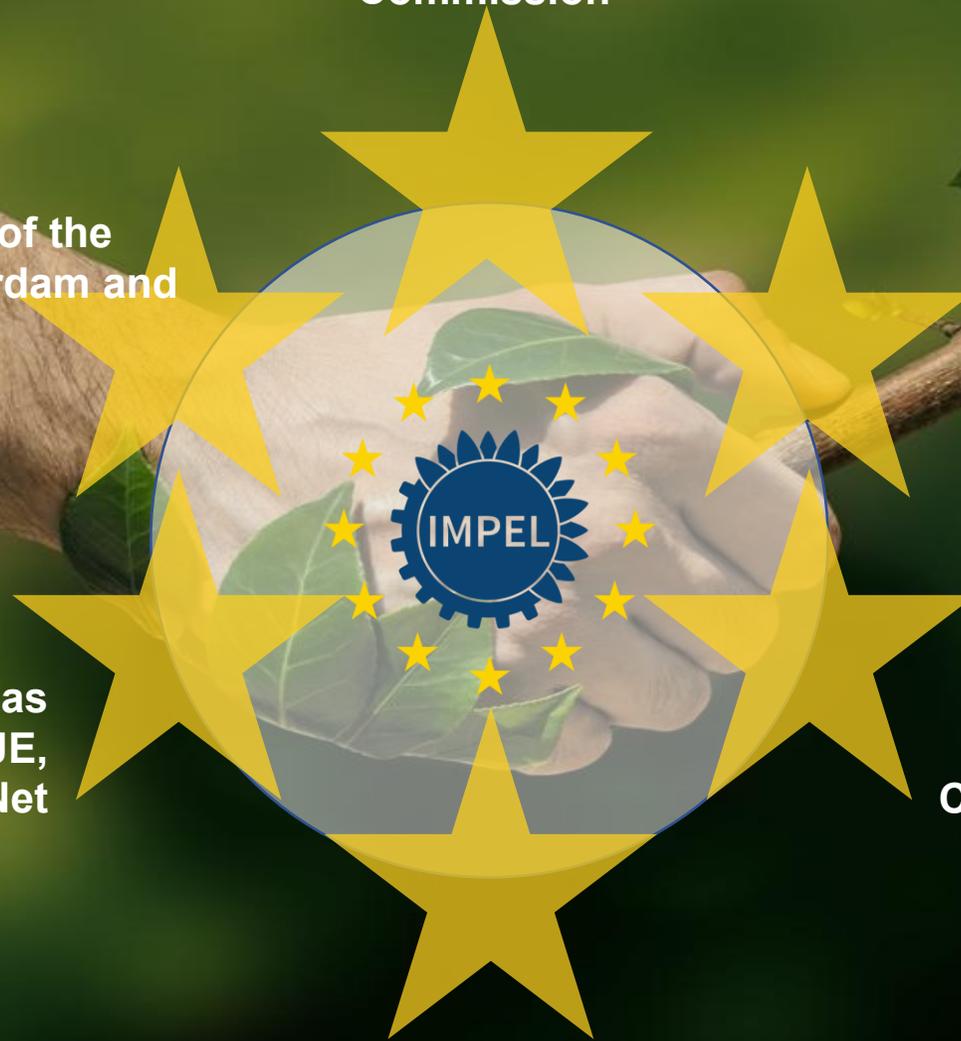
Secretariats of the
Basel, Rotterdam and
Stockholm
Conventions

Institutional
funders

Other networks such as
EUFJE,
ENPE, ENVICrimeNet

Europol, Interpol,
Eurojust, World
Customs Organization,
etc.

Member
organisations



Projects



Good practices with guidance and tools



Joint inspections



Capacity building and training



Exchange of information and experience



International enforcement collaboration



Provide feedback and advice on new and existing EU environmental law

- An overview of the **2025-2027 IMPEL Work Programme** can be found [here](#).
- Projects are linked to IMPEL's **Multi-annual Strategic Programme (MASP) 2022-2027**.
 - The new MASP can be found [here](#).
 - The MASP provides a **longer-term**, strategic direction and sets priorities for IMPEL's work, reflecting the needs of the members and key 'implementation challenges'.
 - Challenges identified by the **Implementation Challenge Survey 2021** (adopted at the France GA in June 2022) influenced the **MASP**.
 - A new **Implementation Challenge Survey** will take place in **2025**.

Projects Waste Shipments 2025-2027

- NCP and Conferences
- Strategic work and Network collaboration
- Enforcement Actions
- Plastic Waste Shipments
- WEEE





Update on response to e-waste amendment

Changes and consequences

- Legislative changes in the EU for transboundary movements of waste
- Waste (WEEE) versus (2nd hand) product (UEEE)
- Classification of certain e-waste streams (e.g. motors and compressors)
- Consequences of the differences in classification

The new EU Waste Shipment Regulation (nWSR)

The [new Regulation on waste shipments](#) entered into force on **20 May 2024**. It aims to:

- Ensure that the EU **does not export its waste challenges** to third countries and contributes to environmentally sound management of waste.
- **Strengthen enforcement to prevent illegal shipments of waste** occurring within the EU, as well as from the EU to third countries.
- **Increase traceability** of waste shipments within the EU and facilitate recycling and reuse.

Although the new Waste Shipments Regulation entered into force on 20 May 2024, most provisions will apply from 21 May 2026 and most export rules will apply from 21 May 2027. Until then, the provisions of Waste Shipment Regulation 1013/2006 continue to apply.

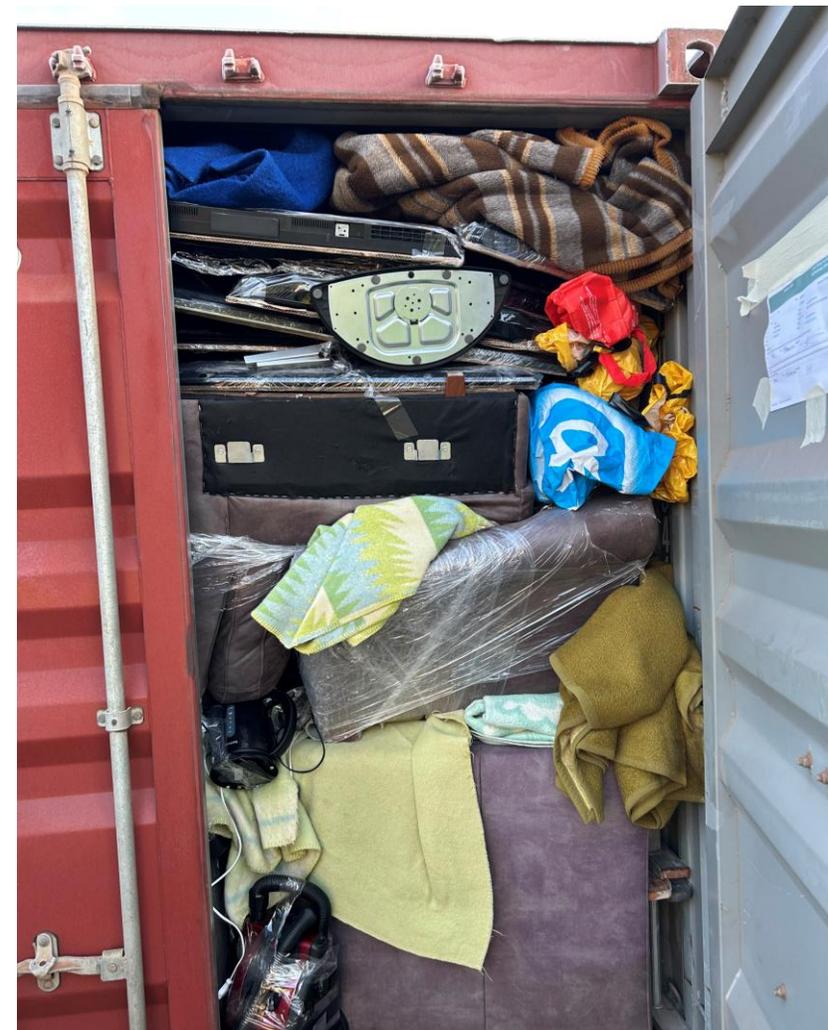
Specifically for e-waste

From 1 January 2025:-

- The export of all e-waste from the EU to non-OECD countries will be prohibited;
- The export of all e-waste from the EU to OECD countries will be subject to the “prior informed consent” procedure;
- The import of all e-waste from third countries into the EU will be subject to the “prior informed consent” procedure;
- The shipment of e-waste between EU Member States will be subject to the “prior informed consent” procedure, except for shipments of non-hazardous e-waste classified, where appropriate, under entries GC010 and GC020, which will remain subject to the general information procedure until the end of 2026.

Note: The EU prohibit the export to non OECD countries of hazardous waste and other waste (Annex II Basel Convention)

Waste or used goods?? (WEEE or UEEE?)



Waste vs used items

- Evidence that its a working product (in EU):
- Copy invoice/ contract stated items used for direct re-use and is fully functional
- Testing/ functionality documents
- Testing conducted by qualified, certified or trained technician
- Declaration that NONE of the items is waste
- Appropriate protection against damage during transport, loading and unloading through sufficient packaging/ stacking

Testing document

TESTRAPPORT CONTAINER NUMBER :MSCU987664-4

Artikel Name and brand	Series Number	Test date	tested by
SINGER SYMASKIN	ART.NR C4737	23/12/14	RA AMAR ELEKTRONIK
AEG SYMASKIN	ART.NR C2774	23/12/14	V HINDBY VÄSTEN 14
BROTHERS SYMASKIN	ART C4738	23/12/14	214 58 MALMO
PHILIPS T.V 40	FZ1A1444007501	23/12/14	TEL 0762636220/076263720
TOSHIBA T.V 32	E147J6Y000794	23/12/14	ORG.NR197711058631
J.V.C T.V 40	BLPE 236423	23/12/14	
SAMSUNG T.V 40	ZL953SBE3000135	23/12/14	
SAMSUNG T.V 46	UE46F53D5XXE	23/12/14	
TOSHIBA T.V 40	40L1353N	23/12/14	
ELECTROLIX MACHINE MACHINE	44700168	23/12/14	
LG T.V 42	905NAYY98866	23/12/14	
CANON COPY MACHINE	1R3200	23/12/14	
KONICA MINOLTA COPY MACHINE	B12HUB222	23/12/14	
WHILPOOL FREEZER	854985996100	23/12/14	
SAMSUNG FREEZER	04644EBFA00570E	23/12/14	
WHILPOOL WASHING MACHINE	12N.C.859388340010	23/12/14	
WHILPOOL WASHING MACHINE	12NC859232061010	23/12/14	
SAMSUNG WASHING MACHINE	S/N 06TJ53BFC0002A	23/12/14	





Appropriate protected against damage during transport, loading, etc.?

NCP questionnaire - WEEE



- WEEE classification from 1.1.2025 – discussions during IMPEL NCP meetings in on takeback cases of WEEE electric motors (export to non OECD)
- The following slides show how different countries classify and treat electric motors and compressors for export - classification codes, shredding requirements, and metal content thresholds.

- **Electric motors (untreated/treated)**



- **Compressors (de-polluted, non-shredded)**

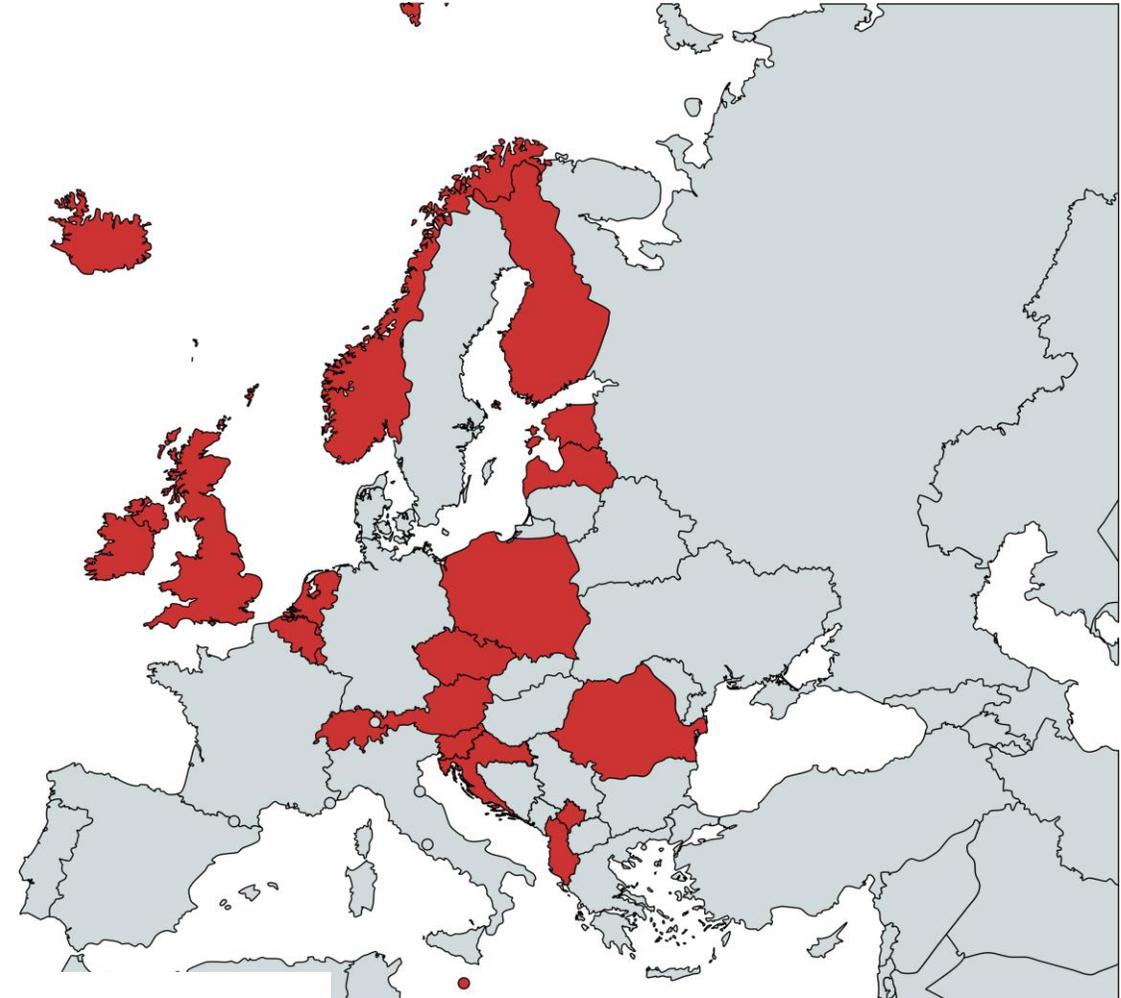


NCP questionnaire - WEEE



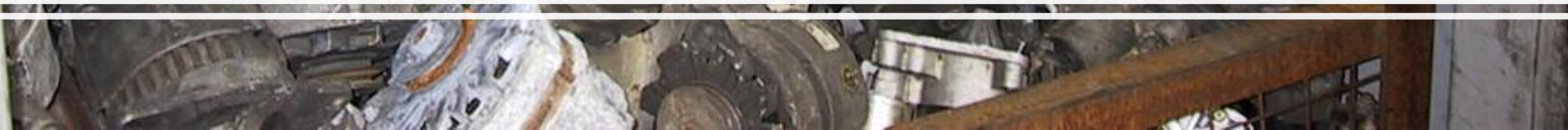
- **Answers from 18 NCPs**

- Germany: are trying to find an agreement on WEEE classification within the 25 regional waste competent authorities. A draft resolution was drawn up and sent to the individual authorities...





ELECTROMOTORS





Electric motors



Country (EU countries marked blue)	How do you classify non-shredded components such as electric motors (or generators, stators, starters and other electrical components) for export from your country? Note: depolluted (without external cables, printed circuit boards etc.)	If you accept B1010 - Does your country require that electric motors have been shredded in order to classify them under B1010/mixture of B1010 (which means that waste is no more identifiable as components of WEEE)?
Albania	B1010 (outside EU, intra EU)	it depends in the request of the exporter
Austria	Y49 outside EU, GC010 intra EU	we consider shredded electric motors as IIIA mixture B1010
Croatia	Y49 outside EU, GC010 intra EU	No
Czech Republic	Y49 outside EU, GC010 intra EU	Yes - we consider shredded electric motors as IIIA mixture B1010, ESM (Article 49) must be proven
England (United Kingdom)	Y49 to OECD and non-OECD	Other (Y49 3rd indent for shredded WEEE, B1010 only when sorted, not shredded, contamination removed, must be correctly described as B1010)
Estonia	Y49 outside EU, GC010 intra EU	Yes
Finland	Y49 outside EU, GC010 intra EU	
Flanders - Belgium	Y49 outside EU, GC010 intra EU	Yes
Iceland	B1010 (outside EU, intra EU); We adjust to the opinion of the CA of the reception facility.	Not sure
Ireland	B1010 (outside EU, intra EU); Provided it is fully depolluted as described, B1010 can apply. Y49 outside EU, GC010 intra EU if not depolluted	We've no such shredding requirement
Kosovo	B1110, GC020/EWC 16 02 16, Annex VII, contrat, proof of treatment	No
Latvia	Y49 outside EU, GC010 intra EU	Yes
Luxembourg	Y49 outside EU, GC010 intra EU	not applicable
Malta	Y49 outside EU, GC010 intra EU	N/A - No facilities locally
Netherlands	B1010 IIIA mixture (outside EU, intra EU);	No
Norway	Y49 outside EU, GC010 intra EU	Yes
Poland	B1010 (outside EU, intra EU); but it's always an individual assessment;	No
Romania	Y49 outside EU, GC010 intra EU	No shredding is strictly required.
Scotland (United Kingdom)	Could be Y49 but have doubt that they would ever be fully depolluted to an acceptable standard. Operators have said to us that it is not possible to depollute the large ones.;	No
Slovenia	Y49 outside EU, GC010 intra EU	Yes
Switzerland	Y49 if coming from WEEE;	No

EU countries	
Y49 outside EU, GC010 intra EU	B1010/mixture B1010
11	3



Depolluted compressors



Country (EU countries marked blue)	How do you classify waste compressors for export from your country? Note: depolluted (no oil leakage, without external cables, printed circuit boards etc.)	If you accept B1010 - Does your country require that electric compressors have been shredded in order to classify them under B1010/mixture of B1010 (which means that waste is no more identifiable as components of WEEE)?
Albania	as i know we dont have the case to export waste compressors	
Austria	Y49 outside EU, GC010 intra EU	Yes - shredded electric compressors could be a IIIA mixture B1010
Croatia	Y49 outside EU, GC010 intra EU	No
Czech Republic	Y49 outside EU, GC010 intra EU	Yes - shredded electric compressors could be a IIIA mixture B1010, ESM (Article 49) must be proven
England (United Kingdom)	Y49 to OECD and non-OECD	Other (Y49 3rd indent for shredded WEEE, B1010 only when sorted, not shredded, contamination removed, must be correctly described as B1010)
Estonia	Y49 outside EU, GC010 intra EU	Yes
Finland	Y49 outside EU, GC010 intra EU	
Flanders - Belgium	Y49 outside EU, GC010 intra EU	Yes
Iceland	B1010 (outside EU, intra EU)	No
Ireland	Provided it is fully depolluted as described, B1010 can apply. It will be Y49/GC010 otherwise	We've no such shredding requirement
Kosovo	B1010 (outside EU) or B1110	No
Latvia	Y49 outside EU, GC010 intra EU	Yes
Luxembourg	Y49 outside EU, GC010 intra EU	not applicable
Malta	No such requests have been received this year	No Facilities locally
Netherlands	has to be proved empty (made not suitable for reuse) than B1010 IIIA	has to be proved empty (made not suitable for reuse) than B1010 IIIA
Norway	not yet discussed	
Poland	It depends	No
Romania	Y49 outside the EU, GC010 within the EU. If fully depolluted and made unusable, B1010 can apply (for export outside the EU), provided evidence is presented (e.g., perforation, treatment certificate).	No, shredding is not mandatory, but compressors must be clearly emptied and made non-reusable. Proof of treatment (visual or documentation) is required to qualify for B1010
Scotland (United Kingdom)	Y49 outside EU, GC010 intra EU	No
Slovenia	Y49 outside EU, GC010 intra EU	not applicable
Switzerland	B1010 (outside EU, intra EU)	without oil and refrigerant and made unusable bei means of drill hole or a slit

EU countries	
Y49 outside EU, GC010 intra EU	B1010/mixture B1010
9	3



B1010 (B1010 mixtures) requirements



Country (EU countries marked blue)	What is the required metal content for waste to be classified as B1010 or Annex IIIA mixtures of metals in your country?	Any other remarks - regarding mixtures of B1010 under IIIA, etc.
Albania		
Austria	at least 90 % (w/w)	
Croatia	Minimum 92 %	
Czech Republic	contamination 5 % is acceptable	-
England (United Kingdom)	the waste must be mostly metal with minimal contamination	We will only classify waste as B1010 if it is correctly described as that. It will not apply to shredded WEEE because this is included in Y49 as the third indent. All non hazardous WEEE, including components, shredded WEEE and WEEE-derived material is classified as Y49 and can be shipped to the OECD and non-OECD under notification controls.
Estonia		
Finland	90 %	
Flanders - Belgium	at least 90%	
Iceland	No specific value	No
Ireland	We have no threshold specified	
Kosovo		B1010 be mixed under Annex IIIA yes, if metals only and non hazardous.
Latvia	no criteria has been established, case-by-case	no criteria has been established, case-by-case
Luxembourg	not defined	
Malta	Not specified however contamination has to be very low or completely absent.	N/A
Netherlands	minimum 90%	Check always reply third country to the EC (Regulation)
Norway	Not yet confirmed	
Poland	100% of metalowe mentioned in definitione of B1010	
Romania	Minimum 90% metal content and visibly free of contaminants (e.g., oil, plastic, printed circuit boards, insulated wires). We follow OECD and EU Regulation (EC) No 1013/2006.	Metal mixtures can be exported under B1010 or Annex IIIA if they are non-hazardous, well sorted, and contain at least 90% metal. Depending on the destination, either notification or simplified procedure applies.
Scotland (United Kingdom)	We don't use contamination limits. Metal would have to be 'almost free from contamination'.	We would consider 10% to be a very high level of contamination.
Slovenia	We have no threshold specified	
Switzerland	without loose organics parts and without insulated cable and WEEE	



Outcomes



- Countries differ in classification codes (Y49, B1010), shredding requirements, and metal content thresholds.
- Electric motors and compressors are more commonly classified under Y49/GC010.
- Compressors require treatment – oil removal to meet export criteria.
- Some countries require shredding of electric motors and compressors to allow export as B1010 mixture.
- National Guidance Availability only in some countries (Austria, UK, Belgium, Ireland, Netherlands, Norway), some others are preparing



Thank you!

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