



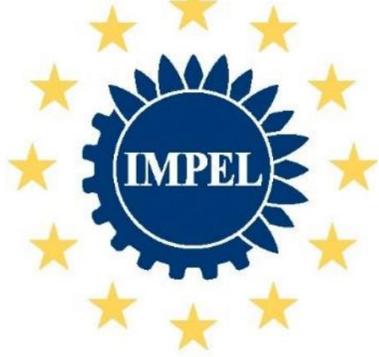
European Union Network for the Implementation and Enforcement of Environmental Law



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**



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

Projects Waste Shipments 2025-2027

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





Update on response to ESM of plastic waste

Changes and consequences

- Legislative changes in the EU for transboundary movements of plastic waste
- New trends
- IMPEL's project on plastic waste



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 plastic waste

- From 1 January 2021, new EU rules apply to shipments of plastic waste. The [new Waste Shipments Regulation](#) introduces further changes.
- The new entries (Y48, A3210 and B3011) have been implemented in the EU Waste Shipment Regulation (EC) 1013/2006
- New entries for shipments within the OECD (AC300) and the EU (EU48 and EU3011) have also been introduced.
- The rules on the export of plastic waste were further strengthened in the [new Waste Shipment Regulation \(EU\) 2024/1157](#), including a prohibition of such exports to non-OECD countries as from 21 November 2026.

Different procedures in the EU depending on type and destination

- **Exports** from the EU
- Exporting hazardous plastic waste (A3210) and plastic waste that is hard to recycle (Y48) from the EU **to non-OECD countries** is **banned**.
- Exporting clean, non-hazardous waste (which is destined for recycling) (B3011) from the EU to non-OECD countries is only authorised under specific conditions. The importing country must indicate which rules apply to such imports to the European Commission (cf. [Commission Regulation 1418/2007](#)).
- Exporting hazardous plastic waste (AC300) and plastic waste that is hard to recycle (Y48) from the EU **to OECD countries** is subject to the “**prior notification and consent procedure**”.

- **Importing** hazardous plastic waste and plastic waste that is hard to recycle into the EU from third countries is subject to the “prior notification and consent procedure”.
- **Intra-EU** shipments
- The “prior notification and consent procedure” applies also to intra-EU shipments of hazardous plastic waste (AC300), and of non-hazardous plastic waste (that is difficult to recycle) (EU48).
- All intra-EU shipments of non-hazardous plastic waste for recovery (EU3011) are exempt from these new controls. For shipments of such waste, general information requirements apply.

Key dates!!!

Key dates related to EU rules on shipments of plastic waste

- 
- 21 May 2029 ○ Non-OECD countries wishing to import EU plastic waste may file a request to be excluded from the export ban.
 - 21 November 2026 ○ Exports of all plastic waste to non-OECD countries will be banned.
 - 21 May 2026 ○ Exports of all plastic waste are subject to “prior notification and consent procedure”.
 - 11 April 2024 ○ [New Waste Shipments Regulation \(EU\) 2024/1157](#) is adopted.

Export 39.15
from
Netherlands

Rijlabels	ID	VN	TR	MY
2024	99.895.223	60.488.456	35.374.970	33.403.348
2025	77.708.007	44.287.360	32.600.235	20.652.150
jan	6.849.934	8.548.026		3.706.420
feb	11.701.060	3.552.860	3.585.620	3.847.010
mrt	8.653.780	3.413.817	5.553.330	4.594.143
apr	5.737.013	3.807.637	3.810.200	2.245.803
mei	6.626.220	3.552.135	2.326.820	1.554.070
jun	8.027.620	2.749.680	4.355.820	940.850
jul	7.272.740	5.141.830	4.371.955	413.280
aug	5.699.960	4.345.190	2.693.970	239.450
sep	7.362.980	4.228.420	1.698.100	1.244.594
okt	9.776.700	4.947.765	4.204.420	1.866.530
Eindtotaal	177.603.230	104.775.816	67.975.205	54.055.498

'New' trends

- Misdeclaration:
 - false HS codes such as HS63.05 instead of 39.15
 - Wrong destination countries in documents (Check booking!!)
- Export as 'End of Waste' (EoW) and 'by-products'
 - are the materials really EoW or by-product?

What is end-of-waste?

- When certain specified waste has undergone a recovery, including recycling, operation and complies with the specific criteria below they are not longer to be seen as waste:
 - the substance or object is commonly used for specific purposes;
 - a market or demand exists for such a substance or object;
 - the substance or object fulfils the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products;
 - the use of the substance or object will not lead to overall adverse environmental or human health impacts.
- The criteria shall include limit values for pollutants where necessary and shall take into account any possible adverse environmental effects of the substance or object.

WASTE OR END OF WASTE?



IMPEL's Plastic waste project

Project Structure



08/12/2025

Main aims

- To develop a strategy to discourage illegal plastic waste shipment to Turkey and SE-Asia and stimulate recovery in the EU.
- To obtain a better understanding of end destinations for European plastic waste and what documentation is required to satisfy WFD requirements.
- To provide regulators with a better understanding of waste plastic flows, particularly to Asian countries.
- To represent IMPEL at various networking events promoting the achievements of the project and the work of IMPEL.

- To have a common approach on the end-of-waste or by-product status for international shipments of plastics
- Make use of the database of EoW developed under the IMPEL WMCE project.
- A knowledge sharing platform and knowledge exchange and gather best practices.
- Develop guidance/leaflets for inspectors and other stakeholders for a better understanding of PPWR in general and the sustainability requirements in particular.
- Share practical knowledge (court cases, documents, reports, experiences)





Thank you!

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