

## **Information on Covid-19 effects on waste shipments in EU Member States + Norway**

On 17 March 2020 DG ENV conducted a rapid survey of Member States authorities on the possible consequences of the COVID19 crisis on the functioning of the internal market for waste within the EU. In view of the novelty of the situation and the uncertainties on its evolution, most respondents indicated that it is difficult to predict how the waste shipment sector will be impacted, but provided useful insights on the current and anticipated challenges for this sector, as well as on a number of measures taken to address them.

This note provides an overview of the responses to the following questions:

1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?
2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?
3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?
4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?

Summary Table – Replies EU Member States + Norway on Covid-19 effects on waste shipments

<b>Received Reply (until 24 March 2020 – 10h)</b>	1.	2.	3.	4.
<b>(1) Austria</b>	No	No restrictions	Delays	No
<b>(2) Belgium (Flanders)</b>	Yes	-	-	-
<b>(3) Bulgaria</b>				
<b>(4) Croatia</b>	No	No restrictions	No	Yes
<b>(5) Cyprus</b>	Yes			
<b>(6) Czech Republic</b>	No	No restrictions yet	Delays	Yes
<b>(7) Denmark</b>	Yes	No restrictions	No	Yes
<b>(8) Estonia</b>	Yes	No restrictions	No	Yes
<b>(9) Finland</b>	No	Yes there are restrictions	No	Yes
<b>(10) France</b>	No	No	No	Yes
<b>(11) Germany (5/16 Länder)</b>	No	No restrictions	No	Not enough information to answer.
<b>(12) Greece</b>				

(13) Hungary				
<b>(14) Ireland</b>	No	No restriction	No	Yes
<b>(15) Italy</b>	No	No	Yes	Yes
(16) Latvia				
<b>(17) Lithuania</b>	Yes	No restriction	No	Yes
<b>(18) Luxemburg</b>	No	No	Restrictions, but handled	-
(19) Malta				
<b>(20) Netherlands</b>	No	No	No	Yes
<b>(21) Norway</b>	No	No restriction	No problems at the border	-
<b>(22) Poland</b>	Yes	No restriction	No	Yes
<b>(23) Portugal</b>	See specific info below			
(24) Romania				
<b>(25) Sweden</b>	No	No restrictions	No	Yes
<b>(26) Slovakia</b>	Yes	No restriction	No problems at the border	-
(27) Slovenia				

<b>(28) Spain</b>	Yes	No restriction	Yes	Yes
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## (1) Austria

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

In general notifications requests are handled in Austria as usual, we try to avoid any additional delays caused by the corona crisis. As restrictions of freedom of movement are currently in force in Austria and also the officials dealing with waste shipments are mainly working at their home office and additionally many requests in connection with changes of transport routes are to be answered for sure in single cases delays can occur caused by the special situation, but currently our system is still fully operational.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

Currently no restrictions for shipments of waste in connection with the corona crisis are foreseen.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

In Austria respectively at the Austrian borders border controls take place in connection with the corona crisis. Delays of waste shipments can also occur in connection with this inspections. However, waste shipments have not been stopped or returned. These measures are general measures also affecting waste shipments.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Shipments of goods are affected in general by the current situation, currently special measures/guidance concerning waste shipments seem not to be necessary.

Final remark: Could you please inform us about the measures taken in resp. the answers of the other MS?

Furthermore I would like to inform you that a new Austrian law in connection with the corona crises has come into force:

In this law (Art. 16) it is regulated concerning the enforcement of Austrian laws that legal deadlines are interrupted until April 30, 2020, and start over on May 1, 2020. This provision is also valid for legal limitation periods. There exists also a possibility of exemptions from this rule. (see Art. 16 of the law enclosed, unfortunately only available in German).

But this Austrian provision is not valid for EU-regulations to be enforced in Austria.

As some deadlines in in the WSR are very tight may be this can be an example for an EU-wide solution for problems connected with deadlines to be met.

## **(2) Belgium**

Is considering to take temporary measures to prolong or suspend notification procedural delays.

## **(3) Bulgaria**

## **(4) Croatia**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

We aren't facing any challenges regarding notification procedures at the moment and we are doing our job regularly. Also we don't expect any remediating measures to be taken. Delay might happen in the next few weeks because we've just received an order to work in teams – some of us from the office and some from home, and changing every two weeks, starting from tomorrow.

*2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

Up to now, we have no information on possible restrictions

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

We had a few requests for changing the route and/or means of the transport due to extraordinary circumstances at the border crossings between Slovenia and Croatia. We also had a particular case of six shipments according to the same notification, going from Italy to Bulgaria and stopped at border between Slovenia and Croatia. The original route was Italy-Slovenia-Croatia-Hungary-Romania-Bulgaria, but we were asked to approve the route via Serbia. We didn't approve such a change and neither did Serbian competent authority.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Yes we think that would be helpful.

## **(5) Cyprus**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

Because of my non physical presence at office, notification requests have to be scanned from the central offices and sent to me electronically for handling. Then written consents can be prepared and sent again electronically to all involved parties during this period which for the moment is according to Government decision is until 16/4/2020.

*2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

For the moment no restrictions have been decided for shipments of wastes.

3. *Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No.

4. *Do you think ~~that~~ any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Yes it will be very helpful.

## **(6) Czech Republic**

1. *Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default)?*

At this time there are no general measures taken in relation to the processing of the notifications. As the government of the Czech Republic has ordered a restriction on free movement of people throughout the Czech Republic, ordered to restrict contact among people and to use a home-based work to a maximum extent the delays in handling notifications may occur. The next steps depend on how the situation will evolve.

As regards the Annex IB movement documents to be sent to the competent authority, the Ministry of Environment of the Czech Republic will not insist on adherence to the time limits stipulated in Art. 16 of the Regulation 1013/2006 provided that the documents are completed at later stage.

2. *Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

The government of the Czech Republic has banned the movement of people across the borders of the Czech Republic. Free movement of goods / waste is not prohibited yet.

We've got information that the consignees in some cases restrict the shipments at their own discretion in order to protect the health of their employees.

3. *Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

We don't know about any case that a shipment has been stopped due to a ban. However, there are long queues at the borders caused by inspection of people still crossing the borders.

4. *Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

In our opinion, at least an exchange of information and overview of the situation in MS' and updates if appropriate will be helpful.

## **(7) Denmark**

1. *Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g.*

*prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

The staff of the Danish Environmental Protection Agency continues to work from their homes, but unfortunately with a certain loss of productivity. We are doing everything possible to work through the practical issues and to best address any challenges, we still have one employee at the location of the EPA who receives and scans physical mail daily.

Because of the situation we are also looking into signing documents digitally to meet the challenges of signing physical documents when working from home and also to diminish the spread of COVID-19. We already have a pre-existing agreement with Sweden and Norway to recognize each other's digital signatures.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

Despite the "closed" borders in Denmark it is currently still possible to transfer waste as it is considered goods and essential services. As only three border crossings between Denmark and Germany is open (as oppose to 13 normally) special lanes for transport of goods have been established. This should preserve the supply chains of essential products and wastes e.g. RDF. No additional certifications have been imposed on goods.

In Denmark the waste management is considered a critical societal task which the emergency preparedness will continue to take care of, but the activity for non-critical (for environmental and health) waste fractions may be diminished.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

The Danish EPA is of the opinion that acceptance of digital documents between the competent EA and at the border crossings, for example on a tablet, will be very helpful.

**Any additional information you might want to share, related to waste shipments in the current situation.**

In Denmark it has per Wednesday 18 March 2020 been banned to gather more than 10 people. Health related measures have also been taken to minimize the risk related to shopping groceries and of overcrowding of shops.

Standard operating procedures have been established, including recommendations on essential hand hygiene and to keep distance are also followed at inspections on border crossings to ensure both the safety of border personal and transport workers.

## **(8) Estonia**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*



In Estonia all people of competent authority are sent to the home offices. Therefore the main challenge we are facing is handling notifications on time. The delays may take place. It would be helpful if the acknowledgement letters and decisions could be signed digitally.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

We do not see any restrictions for transboundary movements due to COVID-19 crisis at the moment. Restrictions may take place if the difficulties in the waste treatment facilities occur.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No, we have not heard.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

As the main target is to avoid direct contacts between people, the processing of notification documents as well checks of documents of shipments on road is challenging. Guidance for electronic processing of notifications and road checks would be helpful.

## **(9) Finland**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

Waste shipment authorities are working from home and visit the office only when necessary because of the required paper work. There has been some problems with network connections but at the moment they are working ok. Difficulties are expected if most of /all the staff have to stop working because of the virus. SYKE will accept electronic notifications case-specifically and electronic movement documents for the time being.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

On the border between Finland and Norway, cargo and return traffic will be allowed only in Karigasniemi, Kilpisjärvi, Kivilompolo, Nuorgam, Näätämö and Utsjoki. On the border between Finland and Sweden, cargo and return traffic will be allowed only in Karesuvanto, Kolari, Muonio, Pello, Tornio and Ylitornio.

Crossing the border at any other crossing site is not allowed.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

It would be good to have a common understanding of the remediating measures taken. At least a list of countries and their actions. At the moment you have to ask every authority separately.

## **(10) France**

*1. Are you facing at the moment any challenge with handling notification requests for*

*waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

The PNTTD is going on examining all the new notification files submitted each day (mainly by email or GISTRID) and the necessary follow-up of notifications already consented. No decision has been taken in order to change the usual procedure (for the dates or delays for example).

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

Currently no restriction has been set up in France regarding shipments of waste.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

To our knowledge, no shipment has been returned or stopped.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

It would be useful for all MS to follow the same lines to take in this context. If not possible for the new files submitted, informations to be given to the notifiers for on going notifications should be shared by EU competent authorities (shipments restrictions or prohibitions, borders and facilities closing....).

## **(11) Germany**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

For 5 regions, no problems have been reported. Certain problems may arise in connection with the fact that more and more colleagues are working from home. One region reports that certain deadlines according to Art. 7-9 cannot anymore be adhered to in all cases and that electronic means are used to alleviate the situation.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

We are not aware of any measures taken in Germany to restrict shipments of waste. However, due to certain other restrictions at the borders, there are traffic jams e.g. at the German/Polish border that have consequences also for waste shipments.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No such cases have been reported.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Currently, we do have not enough information in order to decide whether emergency measures/guidance at EU level would be helpful and also because the problems and

situations are different in different regions. We expect that the competent authorities are taking and will take measures on a case-by-case basis taking into account the different problems and situations.

## **(12) Greece**

We, like many colleagues, may not be in the office but working from home instead, doing our best to ensure the smooth process of workflow.

In response to your questions, we would like to inform you of the following:

1. a. We find it difficult to transmit notifications to the competent authorities of destination, in particular, where originals are required. Therefore, we propose, if it is acceptable by all parties concerned, to send scanned documents electronically only (via our official e-mails or our electronic document management system) - safekeeping the originals in our service. These originals can be then send at a later date, if required.

b. There are 14 containers, loaded with RDF, blocked at the border with the Republic of North Macedonia. The shipments were properly notified: the waste originated in Italy and destined to be recovered (R1) in the Republic of North Macedonia. Unfortunately, these shipments could not be completed as planned because of a ban imposed by the country of destination.

The competent authority of destination has requested their take-back, and the notifier has proposed an alternative: the waste could be recovered in a similar facility in Greece. According to article 22(5) a new notification has to be drawn, which in normal circumstances would have been done already as both the competent authority of dispatch in Italy and our authority have expressed willingness to implement the proposed alternative. However, currently has been proven difficult to do so.

Do you consider that it would be acceptable to move this waste for the border to the new consignee using movement documents, instead of requiring a new notification? Note that a contract, insurance, route info are already been supplied by the parties involved.

2. No restrictions have been imposed for the moment

3. see point 1b above

4. Yes, it would be very helpful to have some guidance on how to proceed.

Kindly note also that since last week, our service has moved to a new location [119, Mesogeion Ave., 11526 Athens] and our phone numbers have changed. Though a dedicated e-mail has been sent so that the correspondents and competent authority contact details can be updated in the relevant lists, I thought that including this information might prove to be useful.

## **(13) Hungary**

## **(14) Ireland**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

At the moment the NTFSO have identified critical staff for processing notification and movement documents and are in the process of obtaining laptops to enable critical staff to work from home if the need arises.

During this period the NTFSO will accept scanned copies of Annex 1A notification documents with scanned signatures only i.e. no original signatures. Shipments may also take place without the need for a hard copy of an Annex 1B/Annex VII to accompany them. The carrier could have a digital copy on their phone instead. The NTFSO have not issued official guidance on these matters as yet.

*2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

The NTFSO is not aware of any such measures and DCCAE will be guided by the Chief Medical Officer in the Department of Health on any measure that should be enacted.

A High Level Covid 19 Waste Management Advisory Group has been established by the Department of Communications, Climate Action and Environment and met on March 11<sup>th</sup> last.



NTFSO Procedure  
During Covid 19 BH (C

The Group comprises both industry and regulatory stakeholders. Its purpose is to examine and coordinate measures that may be required to provide continuation of waste services to households, businesses and health-care/hospital facilities while avoiding disruption to the processing and movement of waste during this period.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

The NTFSO and DCCAE have received no such reports.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

We think the temporary measures in the attached document and in point 1 above could be adopted as guidance on EU-wide scale. It is important that waste shipments remain uninterrupted in so far as possible.

## **(15) Italy**

1. In Italy there are no remediating measures regarding the shipments of waste. Goods as well as waste can circulate so we still keep on authorizing shipments as always;

2. No restrictions have been taken by our government and private actors so far but, as you know, the situation can evolve day by day;

3. Yes, at the moment we know that there are lots of delays at the border with Slovenia and in some cases Slovenia and Croatia stopped and returned shipments of waste coming from Italy;

4. Yes, emergency measures/guidance at EU level would be highly appreciated.

(16) Latvia

### **(17) Lithuania**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remedying measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

There were some problems on the border crossing points and companies asked if it would be possible inform about planned shipment's date less than before 3 working days. At the moment the rows on border crossing points is shorter, but there is no guarantee the trucks will return to Lithuania as planned. We are looking for the decision for corrections in waste shipments electronical system and control mechanism.

During the period of quarantine for coronavirus EPA accepts only electronical documents sent by email. The EPA's consent will be signed electronically and sent by email only, notification document probably won't be sign at all.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

There no government's restrictions for waste shipments.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

We have no information about stopped , delayed, returned shipments.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Some guidance would be good.

### **(18) Luxembourg**

For Luxembourg the biggest challenge was the borders closing, as we depend on waste companies from our neighboring countries for waste collection and disposal, but also for the import of waste for energy production. We asked the companies concerned to hand out a document to their drivers certifying that their passing the border was absolutely necessary in order to prevent emergency situations in the domain of waste disposal.

So far, we did not encounter any major problems.

If needed, we agree to simplifying procedures by accepting documents by e-mail and granting additional time for the payment of notification taxes without delaying our consent.

(19) Malta

## (20) Netherlands

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

The Dutch ministry of Infrastructure and Water Management, responsible for waste management in The Netherlands, stays in close contact with the most important branch organisation concerning waste management. First indication is that, so far, no bottlenecks are foreseen as a result of the corona-crisis. Difficulties might arise when borders are being shut for transport of goods (including waste). For example, Dutch medical waste is partly being incinerated at a special facility in the south of The Netherlands. Another part of this waste stream is being exported to Belgium for processing over there. When Belgium decides to close the borders for Dutch goods, potential processing issues might arise. In the past, medical waste was temporarily stored in other waste management facilities. This will be one of the first options to explore in case a scenario as described here would become reality. However, normal continuance of export of this particular waste stream has our strong preference.

At the moment the transmission of notifications from notifiers to the authority of dispatch and also from the authority of dispatch to the authority of destination is paper work because of the presence of an original signed notification document. In time of the Covid-19 crisis it is necessary that competent authorities should communicate digital instead of by post.

That means that:

- 1) Notifications requests should be accepted from notifiers in digital form (e.g pdf) with a signed pdf-scan of the notification document.
- 2) All communication related to a notification should be send digital (e.g. e-mail), like:
  - a. Transmission of the notification request to the authority of dispatch and possible transit authorities
  - b. other correspondence related to the notification request like the acknowledgment of receipt and decision

The Netherlands will accept the transmission by e-mail. We hope that other member states will accept this as well due to the Covid-19 crisis.

Furthermore we would like to inform you that the Human Environment and Transport Inspectorate provides a tacit consent in case of transit through the Netherlands.

*2. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

So far, the Dutch government has imposed travel restrictions on non-EU residents desiring to enter the Schengen area. As the situation stands today, no restrictions are foreseen on the free movement of goods, including the collection and transport of waste.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

Up to now, no cases are known within the EU. We received yesterday a signal of a company that the border in Greece to third countries is closed and so it is impossible to ship cargo outside the EU. However, we did not verify this information.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Yes see answer under 1. Also if the Covid -19 crisis is going to grow and exist for serious long time, it could be recommended for several intra EU waste movement to create a regime of “WRS light”, e.g. that only the authority of destination has to make a decision on the notification request. In order to preserve the sanitary safety of civil servants working for the WSR competent authorities, and in order to safeguard continuance of administrative processes, we would like to expand the options to process documents digitally under the WSR regime.

As the Netherlands we have decided that we will accept all digital transmission of documents under the WSR. We have also received signals from other Member States that are aligning their position accordingly, in order to guarantee continuance of and safety of intra-EU waste shipments.

But as noted above, in principal the Regulation requires paper, which could lead to different practices and obstacles to working digitally. The WSR does provide the possibility for inspection authorities to agree to this on a bilateral basis, but here we see the problem that if it would not be possible to agree to this bilaterally, that we would thereby be obliged to use regular mail and hardcopies, which is exactly what we want to avoid.

Therefore, we feel that it would be necessary and most helpful if the Commission could send out a signal to inspection authorities in all MS, to call on them, or even urge them, to accept digitally transmitted WSR-documentation. We are not asking you to change legislation or anything, but rather to call on all to use this form of notification for the time being, and to show some temporary leniency in what is and is not accepted.

## **(21) Norway**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

The handling of notifications in Norway works well, and we are on time with our notifications. But due to home office work, we need all competent authorities to accept electronic documents and digital signatures. This practise also prevent unnecessary staff interaction. We do not prolong existing consents, but we could accept some changes in specific cases, like means of transport, routing, amendment of carriers and waste producers.

*2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

We are not aware of such restrictions

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

We are not aware of such cases, but we have indications that transport of goods (and waste) on ferries can be limited in the future

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

We think that a summary of practice, restrictions and other relevant information from the Member states/Correspondents could be very useful. We think that it will be a lot of changes in practice the next weeks, and web based information will probably be the best way to share the information.

## **(22) Poland**

*1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?*

Because most of the people in our waste transport unit responsible for the notification process operate remotely, there may be some delays. We are currently considering the possibility of continuing the notification process without paper versions of the documents. We do not have an electronic document exchange system for TFS, so we will probably have to work with scans of signed documents in this very special situation.

*2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?*

We have no special restrictions regarding the transport of waste related to the situation.

*3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?*

No, we have no signals about such cases, except one notifier requesting a change of route related to a case of force majeure. Due to the increased border control, carriers should expect a much longer waiting time in the queue.

*4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?*

Yes definitely. Guidelines can help to achieve a common approach these days.

## **(23) Portugal**

Due to the actual COVID-19 situation the Portuguese government has declared state of emergency, which implies a special quarantine regime.

As part of a package of measures taken, the Portuguese Environment Agency hereby informs all competent authorities that all communications related to notification procedures will be made by email, from now on until otherwise decision.

For incoming documents we also ask to be sent preferably electronically, otherwise we cannot guarantee the reception and information processing will take much longer.

We will try to maintain the proper functioning of our waste shipment control procedures system. For this purpose we request your understanding.

## **(24) Romania**

## **(25) Sweden**

1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?

*We are still allowed to work at our office but are recommend to work home especially at the office in Stockholm. But the staff working with TFS sits in Östersund, a much much smaller city up in the north. So we do not yet have the same problems as in big city Stockholm. So we can work almost as normally with the handling of notifications. We*



will, as many other countries also have answered, during this special period accept scanned copies of Annex 1A notification documents with scanned signatures only i.e. no original signatures. Shipments may also take place without the need for a hard copy of an Annex 1B/Annex VII to accompany them. The carrier could have a digital copy on their phone instead. The Swedish EPA have issued some guidance on this on our website also, in Swedish <https://www.naturvardsverket.se/Stod-i-miljoarbetet/Vagledning/Avfall/Gransoverskridande-avfallstransporter/Gransoverskridande-avfallstransporter-och-coronaviruset/>. We know that there is a document circulating within SWEAP. Swedish EPA has a link to that document on our website <https://www.naturvardsverket.se/upload/stod-i-miljoarbetet/vagledning/avfall/avfallstransporter/sweap-impact-of-covid-19-on-wsr-documents.pdf> I think it will be updated very soon with more countries information.

*We do not prolong existing consents, but we could accept some changes in specific cases, like means of transport, changing of borders/routing, amendment of carriers and waste producers.*

2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?

*As far as we know there is no special restrictions for shipments of waste in Sweden.*

3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?

*We have heard about delays at borders. We have also been told about cases where carriers that have transported the waste in Sweden have to turn back when they have reached the border to Germany because the next company that will take over and carry the waste in the next country, Germany, have restrictions and are not allowed to work.*

4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?

*We think that a summary of practice, restrictions and other relevant information from the Member states/Correspondents could be very useful. We think that it will be a lot of changes in practice the next weeks, and web based information will probably be the best way to share the information.*

**(26) Slovakia**

1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?

Employees of the Slovak ministry work mostly from their homes, therefore delays in notification proceedings occur.

2. Are any restrictions for shipments of waste in, out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?

At this moment international road freight traffic at the territory of the Slovak republic is not limited. However, some of the crossing points are closed. Situation changes over time. This situation and measures are managed by the Slovak Crisis Headquarters.

Notifiers can announce changes in routing by e-mail to [notification@enviro.gov.sk](mailto:notification@enviro.gov.sk).

Police authorities have determined recommended routes for transit traffic:



New measure from 27 March: In the context of the mail delivery problems in most Member States, we will dispatch all correspondence exclusively electronically. Please, add this information during the next update of the Information on Covid-19 effects on waste shipments in EU Member States.

3. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?

There are delays at the border points.

4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?

(27) Slovenia

## (28) Spain

As you all may know, Spain, since March 15<sup>th</sup> is at an Alarm State, for at least 15 days.

Due to this situation, the Ministry for the Ecological Transition and the Demographic Challenge, as the competent authority for the transboundary movements of waste, has published a Resolution in which allows notifiers to send their notifications, as well as all the documentation, through e- mail with electronical signature.

Also, we will send our authorisations to the competent authorities by email, due to the situation we are dealing with right now.

In Spain, as established in our waste Law (Law 22/2011, on waste and contaminated soils), the competent authorities for the Basel Convention for shipments of waste between Member States are the autonomous communities. In order to give answer to the questions posed, we have asked them to provide us with their specific situation.

Please, find below our general view of the situation, in which we reflect the answers received from the autonomous communities.

**1. Are you facing at the moment any challenge with handling notification requests for waste movement in, out or through your country, or do you expect challenges to arise in the near future? Are there any remediating measures taken or foreseen (e.g. prolonging or suspending procedural delays, application of tacit consent by default, ...)?**

The general point of view is that activity is going on as usual. We foresee that if waste shipments were to be halted, the waste treatment facilities activity would be heavily affected, as most of their raw material comes from imports from UE. Madrid has underlined that the problem which is facing right now, due to the Alarm state, is that they have no access to their information systems incapacitating them to manage all the notifications. They are also worried that due to the lack of inspection capacity more illicit shipments could take place. Some communities, following what has been done for transboundary movements, will also adopt a resolution allowing emails with electronic signature, in order to facilitate processing files.

Castilla la-Mancha has agreed not to issue new authorizations but to continue with the current activities of control, study and request for information by informal means.

Pais Vasco has pointed out, that due to the situation of COVID19 and the current accident occurred at the disposal facility of Zaldibar, some delays are taking place on the issuing of notifications.

**2. Have you heard of any cases whereby waste shipments have been stopped, delayed or returned because of any restrictions recently enacted for intra EU movements?**

No measures have been taken so far, although some movements have been cancelled. We foresee an increase number of cancelled movements, due to the measures taken in the context of direct orders from the competent authority for the purposes of the alarm state. Also, cancelations are also occurring because the home companies are not

working.

We also think, in general, that we will deal with problems regarding the disposal facilities capacity (incineration) , resulting in non-compliance with storage times. In relation with this, Canary islands has pointed out that they foresee to have problems with their shipments with Portugal of LER 18 01 08\* , 18 02 07\* y 18 01 09 because if the situation continues, maybe Portugal will denied access of waste from other countries to their treatment facilities , due to their own need to treat their waste generated by COVID19. In case this happens, Canarias is thinking of taking the waste to other treatment facilities in Spain, or even increase storage periods.

Cataluña has pointed out that some waste coming from Italy has been stopped at the Italian border, without knowing the exact cause (delay, prohibition, or another situation). We are also aware that some French enterprises have decided to suspend the waste shipments.

Pais Vasco has reduced their disposal capacity due to the accident occurred in Zaldibar, which will affect the authorization of new shipments. As a result, some shipments will be denied .

**3. Are any restrictions for shipments of waste in , out or through your country foreseen, as part of general measures taken by your governments, by private actors in your country, or specifically targeting collection and transport of waste?**

No restrictions are foreseen

**4. Do you think that any emergency measures/guidance would be helpful at the EU level to overcome these challenges?**

We consider that any measures or guidance's at EU level will be very well welcome; they will be very useful in order to harmonize criteria among all the competent authorities.

We also think this will be a good opportunity to develop article 26.4 of Regulation 1013/2006 regarding submitting and exchanging information and documents by means of electronic data interchange with electronic signature or electronic authentication in accordance with Directive 1999/93/EC of the European Parliament and of the Council (1), or a comparable electronic authentication system which provides the same level of security.

We would also would like to let you know that Andalucía has decided to suspend all scheduled inspections, as well as all the inspections in transit (roads, harbors, or by train) and to any facility.