

Producer Responsibility: Examples of broadly equivalent standards for packaging and equivalent standards for WEEE and batteries

All evidence submitted must:

- relate to the overseas reprocessing site that is included in the application
- have a valid date at the time of submission
- refer to the reprocessing activity and the conditions/standards that it needs to operate
- have an English translation and be accompanied by a colour photocopy of the original document; and
- have an official stamp on the original document and reference to the competent authority, if it is an environmental licence.

Listed below are examples of documents that can be accepted as evidence¹. Please note:

- ISO 14001 will only be accepted where a country does not regulate the overseas reprocessing site through a permitting regime. Any ISO 14001 must specify the reprocessing site address and reprocessing activity on the certificate.
- Renewals or extensions must be accompanied by a copy of the original document.
- A statement from the competent authority which shows that the reprocessing site is regulated and works within a system that meets broadly equivalent standards for packaging and equivalent standards for WEEE and batteries is acceptable.

You need to check if an export is allowed under the Waste Shipment Regulations. Inclusion in the list below does not confirm that the export is allowed. You can check this using the waste exports tool at: <http://apps.environment-agency.gov.uk/waste-import-export/124357.aspx>

For waste subject to notification controls, you should submit proof you have applied for notification approval.

You need to be aware of other domestic/EU legislation, commercial or local controls which may apply in States of transit or destination. You should also be aware that other States may adopt a different interpretation in relation to waste classification. If you are exporting waste, it is your responsibility to ensure that the waste shipped is appropriately classified and that all applicable controls are complied with. We therefore advise that before shipping waste you make appropriate checks with the other States concerned and seek independent legal advice on the applicable controls.

Some relevant controls are included in the notes section below but this is not an exhaustive list and may not be up to date at the time of export.

¹ The list of evidence types is not a prescriptive list - these are just examples of the types previously received which have been agreed between the Agencies (Environment Agency, Scottish Environment Protection Agency, Natural Resources Wales, and Northern Ireland Environment Agency) to acceptably demonstrate broadly equivalence. If other documents are provided and they explain how reprocessing operations are regulated to protect the environment then these will be considered and may be accepted.

Country	Regime ²	Regime details	Acceptable evidence	Notes
Bangladesh	Packaging, batteries & WEEE	Regulated at country level	Permit from the People's Republic of Bangladesh	Must contain terms and conditions of operation.
Brazil	Packaging, batteries & WEEE	Regulated at state level	Operating licence from Government State of 'xxxx', from Environmental Secretariat	'Certificate of Registration from Brazilian Army' / 'Certificate of Potentially Polluting Activities' are not valid alone. Must have operating licence.
Canada	Batteries and WEEE	Environment and Climate Change Canada	Permit from local regime	Permits are issued by the relevant region's ministry e.g. Ministry of Sustainable Development, Environment, and Fight Against Climate Change (MDDELCC) in Quebec.
China	Packaging, batteries & WEEE		<ul style="list-style-type: none"> Import licence (MEP licence sometimes referred to as SEPA licence) <p>The copy provided must be clearly scanned, coloured with the water markings visible.</p> <p>If the import licence is not clearly scanned, coloured with the water markings visible, a permit or inspection/environmental report is also required.</p>	<p>Local Import Controls apply: lists of restricted and banned materials have been extended from 2019.</p> <p>AQSIQ (General Administration of Quality Supervision, Inspection and Quarantine) will not be accepted as evidence as they do not relate to the reprocessor.</p> <p>Examples of documents that may be suitable permit or inspection/environmental reports:</p> <ul style="list-style-type: none"> Waste disposal certificate, or Environmental report (issued within last 2 years), or Inspection report (issued within last 2 years), or Waste emissions permit, or Pollution discharge permit <p>If the documents do not mention the reprocessing activity, you may be asked for further information.</p>
Egypt	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	
Hong Kong	Packaging, batteries & WEEE	Environmental Protection Department	<ul style="list-style-type: none"> Local environmental permit, e.g. Water Pollution Control Ordinance An import permit issued by the EPD, if required (see notes) 	Import of the following types of waste requires a permit issued by the Environmental Protection Department (EPD) under the Waste Disposal Ordinance: (a) any waste of a kind specified in the Sixth Schedule*, unless the

² The Producer Responsibility regime evidence is required for. Blue indicates all regimes and orange indicates WEEE and batteries.

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			For 'regulated e-waste': a waste disposal licence and import permit are required.	<p>waste is uncontaminated and is imported for the purpose of a reprocessing, recycling or recovery operation or the reuse of the waste;</p> <p>(b) any waste of a kind specified in the Seventh Schedule*, or not specified in the Sixth Schedule*; or</p> <p>(c) any other e-waste</p> <p><i>* of the Waste Disposal Ordinance, Hong Kong. Further guidance can be found at https://www.epd.gov.hk/epd/sites/default/files/epd/english/environmentinhk/waste/guide_ref/files/2015_ie_english.pdf</i></p> <p>Regulated e-waste is whole WEEE such as waste air conditioners, refrigerators, washing machines, televisions, computers, printers, scanners and monitors.</p>
India	Packaging, batteries & WEEE	Regulated at state level	<p>Either:</p> <ul style="list-style-type: none"> • Pollution Control Board (PCB) licence, or • authorisation/ consent certificate, or • Registration for the recycling of plastic waste (Plastic Waste (Management & Handling) Rules 2011 and amendment Rules 2011), or • Import Licence if the activity is specified on the licence 	<p>Extensions to PCB licences are not acceptable alone. The original licence must also be submitted.</p> <p>A ban on imports of waste plastics is scheduled from August 2019.</p>
Indonesia	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Permission/ Permit of Liquid Waste Disposal, or • Emission Standard, or • Import Licence (LIMBAH) 	<p>Local Import Controls apply: all imports of Non-B3 (non-hazardous) waste must be inspected in the loading country by an inspection company appointed/approved by the Indonesian Competent Authority. At the time of publishing the inspection company was 'Baltic Control'.</p> <p>A LIMBAH (import) licence issued by the Ministry of Trade in consultation with the Ministry of Environment is required for TFS compliance. It is valid for one year.</p> <p>An 'Emission Standard' is issued by the Ministry of Environment Management, and covers emissions to air from a static source (no expiry date).</p> <p>A 'Discharge of Waste Water Standard' issued by local Govt Authority (no expiry date).</p>

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Iran	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	
Israel	Batteries & WEEE	Ministry of Environmental Protection	Either: <ul style="list-style-type: none"> Hazardous Materials Permit, or Emission Permit, or Import Permit 	
Japan	Batteries & WEEE	Department of Environment	Permit issued under the Waste Management and Public Cleansing Law 1970 (and amendments)	
Malaysia	Packaging, batteries & WEEE	Department of Environment Department of National Solid Waste Management	Either: <ul style="list-style-type: none"> Scheduled Waste Treatment and Disposal Facility from Department of Environment, or Environmental Impact Assessment from DoE with clear approval conditions, or Written Approvals/Notifications (e.g. covering discharges to air, water) for site operations with regard to the Environmental Quality Act, 1974, issued by DoE, or For <u>waste plastics</u>, you must submit an Approved Permit (AP) for import, issued by the Ministry of Housing and Local Government/Department of National Solid Waste Management 	Exporters should also hold proof they are an approved foreign supplier for the site in Malaysia. Warehouse Licence is not acceptable. Local import controls for plastics. PVC is no longer prohibited as it now falls under Article 18 controls. A Pre-Siting Evaluation document is not acceptable as it is a requirement for the planning stage rather than the operational stage.
Mexico	Batteries & WEEE	Department of Environment and Natural Resources	Department of Environment and Natural Resources environmental permit or licence	
Morocco	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	
Nepal	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	

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Pakistan	Packaging, batteries & WEEE	Ministry of Climate Change	NOC (No Objection Certificate) for imports	<p>The NOC for imports is issued by the Ministry of Climate Change in Islamabad. The UK exporter should be named on the NOC.</p> <p>The agencies understand that local import controls apply for plastic scrap/waste: material must undergo pre-shipment inspection in the exporting country by one of the companies mentioned in Import Policy Order 2016 Appendix-H, Pakistan Ministry of Commerce.</p>
Philippines	Packaging, batteries & WEEE	Department of Environment and Natural Resources	Either: <ul style="list-style-type: none"> Department of Environment and Natural Resources permit to operate, or Environmental Compliance Certificate, or Certificate of Non Coverage 	If the document supplied does not reference the reprocessing activity, then another piece of evidence is required to confirm the reprocessing activity.
Russia	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	The Agencies understand that Local Import Controls apply for <u>waste plastics</u> : the material must be tested for polychloride biphenyls and other hazardous materials prior to export, and test results made available to the Russian authorities.
Serbia	Packaging, batteries & WEEE	Ministry of Environmental Protection of the Republic of Serbia Serbian Environmental Protection Agency	<ul style="list-style-type: none"> Import permit issued by the Ministry of Environmental Protection of the Republic of Serbia, and Reprocessing/treatment permit issued by the Serbian Environmental Protection Agency (SEPA) 	
Singapore	Packaging, batteries & WEEE	National Environment Agency of Singapore	National Environment Agency permit or licence	NEA permit is a minimum requirement. A number of these may be required for one site (e.g. for waste storage, discharges). Business registration is not valid on its own.
South Korea	Batteries & WEEE		Local environmental permit	
Sri Lanka	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	
Switzerland	Batteries & WEEE		Permit from local regime	

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Taiwan	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Scrap Recycle Re-use Registration issued by the Local Government, or Operation licence, or Air or Water Pollution Control Certificate issued by the local Government 	A Regulated Recyclable Waste Operation Certificate is not acceptable BE. Local Import Controls apply: <ul style="list-style-type: none"> for <u>waste plastics</u> an import licence is not required for material which is single plastic material (polymer) <u>and</u> single form. Otherwise an import licence is required from the local competent authority; <u>waste paper</u> imports are limited to unbleached kraft paper or paperboard or corrugated paper or paperboard, or recovered and well-classified other paper or paperboard made mainly of bleached chemical pulp.
Thailand	Packaging, batteries & WEEE	Ministry of Industry	Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit, or Factory Operating Licence 	WEEE imports are banned indefinitely. The export of WEEE derived materials and waste plastics is under Notification controls. A ban on waste plastics is scheduled for 2021, however, the Agencies have been informed that a ban may essentially be in effect now.
Turkey	Batteries & WEEE	Ministry of Environment and Urbanisation	Environmental Permit and Licence Certificate from the Ministry of Environment and Urbanisation (or Temporary Operation Certificate)	Scrap Importer document from the Ministry of Environment and Urbanisation is not acceptable. A Compliance Certificate is issued by the local Provincial Directorate of Environment in Turkey after a physical inspection of the material and paperwork, before a load can be released from the customs area.
Ukraine	Packaging, batteries & WEEE	The Ministry of Ecology and Natural Resources	Either: <ul style="list-style-type: none"> Licence issued by MENR, or Letter of exemption issued by MENR 	The Ministry of Ecology and Natural Resources of Ukraine (MENR) is the regulatory body and waste activities require a licence provided either by this ministry or the municipal authorities.
United Arab Emirates	Packaging, batteries & WEEE		Either: <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit 	
USA	Batteries & WEEE	Environmental Protection Agency	Permit from local regime	
Vietnam	Packaging, batteries & WEEE	Department of Resources and Environment	Certificate of eligibility for the import of scraps	Local Import Controls may apply in particular to waste plastics and paper. A ban on imports of waste plastics is scheduled for 2025.