



Human Environment and Transport Inspectorate  
*Ministry of Infrastructure and Water Management*

# NSRR Fast-track: 'Regulators' perspective



# NSRR : the 1<sup>st</sup> International Green Deal

- Aims to boost the circular economy in North Sea countries by facilitating sustainable trade and transportation of secondary resources
- Geographical focus area: countries in North Sea region that consider themselves frontrunners in field of circular economy
- Not waiting for consensus between 28 EU member states, but inspire them



## NSRR: Green Deal approach

- Bottom up: companies in the lead, governments support, different stakeholders involved
- Goal: boost innovations in circular economy
- Scale-up: inspire; improve framework conditions, create new networks, action orientated
- Also: no financial support, no guarantee of success



# NSRR: what is it all about?

## Goal

- Facilitate trade & transportation secondary raw materials by looking at national interpretation and enforcement of (waste) legislation

## Issues

- Waste/EoW, WSR, REACH

## Common search

- Harmonisation between participating countries and optimal use of possibilities ***within*** current (EU) legislative framework



# NSRR: 'fast-track'

## Philosophy with regard to the industry

- Compliant recycling is integral part of the Circular Economy
- European borders should not be insurmountable barriers
- Within Europe, secondary raw materials travel in line with the requirements of today's industrial world:
  - Quick, just-in-time, without unnecessary costs
  - Ideally with electronic data exchange of appropriate data for these transactions



# NSRR: 'fast-track'

## Philosophy with regard to the Inspection

- Safeguarding the environment and human health
- Reducing workload for notifications to compliant recyclers
- Thus freeing up time and resources to attack true illegal exports i.e. focus on the 'bad guys'
- Work within EU legislative framework



## NSRR approach to fast-track

- Solution needs to be found **within** the WSR boundaries!
- Article 14 offers handle towards fulfilment of the vision:
- *...“Article 14 of Regulation No 1013/2006 provides that the competent authorities of destination which have jurisdiction over specific recovery facilities may decide to issue pre-consents to such facilities. This means that the authority of destination will not raise objections concerning shipments of certain types of waste to the facility, and as a consequence the time limit for objections by the authorities of dispatch and transit is shortened to 7 working days.....”*



# NSRR Fast-track participants and analysis

- Participants: UK, Flanders, Austria, The Netherlands (policy and inspection)
- Companies – Müller-Guttenbrunn and HKS Metals
- EERA and Euric,
- Commission – DGENV





# Challenges

- According to survey
  - Pre-Consents are not applied consistently within Europe and often not even recognized
  - NSRR participants do use pre-consents
  - Requirements for pre-consents are not standard

→ Can this group of EU CE front runners develop and implement a joint pre-consent format? And feed into revision of WSR?



# Changed policy Dutch Inspectorate

- Role: stimulate a safe and sustainable environment
- Policy ILT: look for harmful behaviour instead of forbidden behaviour
- Context:
  - CE: Changing environmental policy
  - Main port Rotterdam
  - Main stream throughput
  - Risk-based and data driven execution
  - Effectiveness WSR has its limits



## 'As is' situation

- Dilemma:
  - how to solve tomorrow's problems with yesterday's legislation
  - No harmonisation between countries
  - How to loop common practical experience back to policy and legislation
  - How to spend as little time as possible on the good guys
  - How to reconcile CE ambitions with the mind-set of the regulator
- Perspective:
  - To create space for compliant CE operations
  - Pre-consent art 14 WSR
  - Diminish work load from both sides (trust)
  - Solution for financial guarantee (pre-consented cie)



## How far is the journey

- Test with Holland-Austria has nearly reached its goals:
  - Permit in Holland took eight days
  - Permit in Austria is pending and within reach
- Follow-up project preferably with France
- Change in the financial guarantee



**The END**