

Sayı: 70430465-TİM.OAİB.GSK.YESİL.2025/178-7670
Konu: WSR Uzman Grubu Toplantısı

Ankara, 24/07/2025

Sayın Üyemiz,

Ticaret Bakanlığı'na atıfla Türkiye İhracatçılar Meclisi'nden alınan bir yazıda, Avrupa Birliği (AB) Atık Sevkiyat Tüzüğü'nün (Waste Shipment Regulation-WSR) uygulanmasına ilişkin mevcut durumun ele alınması amacıyla gerçekleştirilen Atık Uzman Grubu toplantısının 20 Haziran 2025 tarihinde gerçekleştirildiği bildirilmektedir. Bahse konu toplantının tutanakları ekte sunulmakta olup, toplantıda ele alınan hususlar aşağıda özetlenmiştir.

Bu çerçevede, bahse konu ikincil mevzuat aşağıda sıralanmaktadır.

- Avrupa Komisyonu (Komisyon) tarafından Dijital Atık Sevkiyatı Sistemi'ne (Digital Waste Shipment System-DIWASS) ilişkin bilgi verilmiştir. Bu doğrultuda, DIWASS sisteminin doğrudan bir internet sitesi (grafiksel arayüz) üzerinden ya da API yoluyla yerel sistemler veya ticari yazılımlarla bir merkez aracılığıyla bağlantı kurularak kullanılabileceği, bu tür bir bağlantının mümkün olabilmesi için ilgili sistem ve yazılımların bir uygulama mevzuatı ile belirlenecek birlikte çalışabilirlik kriterlerine göre oluşturulması gerektiği ve anılan uygulama mevzuatının Temmuz ayında Komisyon tarafından kabul edilmesinin beklendiği, ayrıca DIWASS'ın AB operatörleri için 21 Mayıs 2026 tarihinde zorunlu hale geleceği açıklanmıştır.
- “Yeşil listedeki atıklar” olarak adlandırılan atıkların sınıflandırmasının uyumlaştırılması hakkında başlatılan kamu istişare sürecine yönelik olarak istişarenin mevcut yeşil liste sınıflandırmasını etkilemeyeceği, ancak bu sınıflandırmanın ilave atık sevkiyatlarını kapsayacak şekilde genişletilmesinin değerlendirileceği, ayrıca gönderen ve alıcı ülkeler arasında atık sınıflandırması uyumsuzlukları konusunda WSR 29. maddesinin açık olduğu ve bu durumda en katı yaklaşımın geçerli olacağı belirtilmiştir.
- Komisyon'un AB'den atık ithalatına devam etmek isteyen Ekonomik İşbirliği ve Kalkınma Teşkilatı (OECD) dışı ülkelere otuz başvuru aldığı ve bu başvuruların farklı atık türlerini kapsadığı, 21 Mayıs 2027 tarihinden sonra belirli AB atıklarının hangi OECD dışı ülkelere ihraç edilebileceğini belirleyecek yetkilendirilmiş düzenlemenin en geç 21 Kasım 2026 tarihine kadar kabul edilmesi gerektiği, Komisyon'un OECD ülkelere yapılan atık sevkiyatı hareketlerini izleme rolünü özellikle plastik atıklar konusunda dikkatle yürüttüğü belirtilmiştir. Plastik atıklarla ilgili olarak 21 Mayıs 2026'dan itibaren üçüncü ülkelere yapılacak tüm plastik atık sevkiyatları için PIC prosedürünün (ön bilgilendirme ve onay süreci) uygulanmasının zorunlu olduğu ve 21 Kasım 2026 itibarıyla OECD dışı ülkelere plastik atık ihracatının yasaklanacağı hatırlatılmıştır.

Ayrıntılı bilgi için: Burcu Demiröz Çataklı - Uzman

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- Atık ihracatı kapsamında denetim yükümlülüklerine uyma sorumluluğunun AB ihracatçısına ait olduğu, denetim raporunun WSR'nin 46. maddesi ve Ek X hükümlerine uygun olduğu sürece birden fazla sevkiyatta referans olarak kullanılabileceği, Komisyon'un yöneteceği denetim sicilinde yalnızca denetlenen şirketlere dair bilginin yer alacağı ve denetim raporlarının bu sicilde yer almayacağı, dolayısıyla Komisyon'un bu raporları aktif olarak kontrol etmek gibi bir rolü olmadığı vurgulanmıştır.
- OECD ülkeleri için denetim yükümlülüğünden muafiyetin ancak AB ile diğer ülkeler arasında yapılacak uluslararası bir anlaşmayla mümkün olduğu, denetimlerin AB'ye akredite şirketlerce yapılmasının gerekmediği ve varış ülkesinde ulusal akreditasyona sahip kuruluşlarca da yapılabileceği belirtilmiştir.

Bu kapsamda, varsa bahse konu denetim yükümlülükleriyle ilgili rehberlik dokümanının kapsam ve içeriğine dair görüşlerin ekli görüş formu (Ek-3) kullanılarak **5 Eylül 2025 Cuma günü mesai saati bitimine kadar** yesilekonomi@oaiib.org.tr adresine iletilmesi gerekmektedir.

Bilgilerini ve gereğini rica ederim.

Musa DEMİR
Genel Sekreter

Ek:

- 1) Atık Uzman Grubu Toplantısı Raporu – 1 (4 Sayfa)
- 2) Atık Uzman Grubu Toplantısı Raporu – 1 (5 Sayfa)
- 3) Görüş Formu (1 Sayfa)

Ayrıntılı bilgi için: Burcu Demiröz Çataklı - Uzman

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Report from meeting of Waste Expert group – Waste Shipment Regulation

Closed session 20 June 2025, 14:30 – 16:30, Borchette + online

Participants:

- COM: ENV B3 and A2 representatives
- Member States: AT, BE, BG, CZ, DE, DK, ES, FR, IE, IT, LT, LV, MT, NL, PL, PT, HR, SI, SK;
- EEA countries: NO, IS;

1. Introduction and adoption of agenda

COM welcomed the participants of the meeting and presented its agenda. It informed the participants that the objective of the meeting is to (i) address questions that were parked during the Committee discussions on the implementing act for the interoperation of systems and that are rather related to the practical operations of the systems; (ii) inform them about the next steps in developing of and interconnecting with DIWASS as well as the further process of explaining and training on DIWASS; (iii) discuss the technical documentation on the development of the API.

COM also briefly explained how the facility completion certificates under Article 15(5) of the WSR would be implemented in DIWASS pursuant to the implemented act, revised in this respect after the public feedback phase of the act's preparation. COM underlined that such certificates would be linked directly with the notification document and could be submitted in relation to several movement documents based on such notification.

2. Q&A

COM presented replies to questions raised by MS experts during the preparation of the implementing act, concerning 6 detailed topics.

a) Changes of the operator's details in IMSOC and impact of such changes on documents exchanged via DIWASS

COM explained how changes of operator's details need to be approved in DIWASS, and how they would be reflected in documents that were submitted in DIWASS prior to introducing these changes. Then, COM presented how cases of mergers and divisions of operators would be handled.

Replying to MS questions, COM recalled that the term "main CA" refers to the CA in a given MS that approves operator registrations, and that this is relevant for registration of operators with registered offices in a country, where there are several CAs, and not for the management and decisions in notification procedures as such. COM also explained, that although DIWASS would not allow to transfer the portfolio of an operator that ceased to exist as a result of a merger, to another operator, the operator's account can be transformed into a site of the operator that took over such first operator. COM also clarified that the API would not offer a specific operation to

exchange history of changes in operator details, but based on data pulled from DIWASS by the local systems and the frequency of synchronisation, such history of changes can be reconstructed by the local systems themselves.

b) Issuance and changes of decisions

COM explained how CAs may introduce conditions to their consents in DIWASS, withdraw their decisions and update them. COM asked MS to indicate whether the withdrawal of decision should be updateable, to enable changing such decisions after national appeal procedures.

When replying to MS questions, COM reiterated that DIWASS would not link the possibility to generate movement documents with the status of financial guarantee due to the fact that DIWASS in general would not provide specific tools to manage financial guarantees. COM clarified also, that DIWASS would indicate a status for each movement document, indicating whether such documents were submitted, shipments covered by them are moving or were received by the consignee or facility.

c) Access to documents

COM presented the issue of carrier access to attachments to the notification document recalling the concerns raised by some MS that carriers should not be able to see all sorts of attachments due to confidentiality reasons. COM indicated that DIWASS may restrict carriers' access to certain types of attachments and invited MS to return with their detailed views on the scope of such restriction.

Several MS took the floor, indicating the types of documents that carriers should be able to see. One MS indicated that they do not see the need for carriers to see any of such attachments. COM invited MS to provide all feedback also in writing.

COM finally briefly presented how DIWASS would manage the access to documents of the operators, notably carriers, who had been removed from the notification after it was already consented to.

d) Timestamps

COM indicated that timestamps in DIWASS refer to the date when a document arrived in DIWASS (submitted there directly or via API), and not the time when document was uploaded in the local system or software. COM reiterated also that thanks to the obligation to synchronise with DIWASS after every action performed, discrepancies between these two moments should be minimised to the furthest possible extent.

e) Certain elements of “user friendliness” of DIWASS

COM briefly explained that DIWASS would notify CAs and operators on changes introduced to the system via automated e-mails. It also described that DIWASS will always present the most updated version of the document, recording the history of changes, but it would not – at least in its first version – allow to access the initial version of the document submitted.

COM indicated it is looking into other issues, flagged by MS experts, such as (i) possibility of extraction of data from DIWASS, (ii) practical way to divide works on notifications between

different users representing one CA, (iii) exact scope of e-mail notification system. COM also confirmed that operators from local systems can be migrated into DIWASS, provided that their details are arranged according to the requirements of the implementing act.

f) Introducing information into DIWASS on behalf of third country CAs and operators

COM explained the various scenarios in which EU CA or operator would be required to introduce data into DIWASS on behalf of third country CAs and operators that do not use DIWASS. COM also indicated that as soon as third country authority starts to use DIWASS, COM would ask this authority either to manage its operators in DIWASS, or to insert data to DIWASS on their behalf, so that this obligation would no longer burden the EU CAs. COM also proposed that in order to facilitate the process of registering third country CAs into DIWASS, it would ask MS to share the data and information of authorities that CA work with today. COM could then compile this information to detect any discrepancies, and then introduce it in DIWASS as the initial input of information.

Replying to MS questions, COM confirmed that in case data on behalf of third country CAs or operators needs to be introduced by EU CAs of transit, each of such authorities will be allowed to do it, but indeed it would need to be agreed, which of EU transit CAs is the one responsible to do it. COM proposed that it should be the first EU CA of transit and asked for MS views. It further explained that in DIWASS it would be clearly indicated where EU CA or EU operators insert data into DIWASS on behalf of another actor, and that it would be possible to attach statements signed by these other actors to the respective documents submitted in DIWASS. Adding such statements would however not be mandatory in DIWASS – the system would not require adding an attachment in order to submit a document.

Several questions were raised in relation to the use of DIWASS by third country operators. COM explained that it is still in the process of discussing the practicalities related to that, including also the issue of personal data protection transfers. COM indicated that it strives to present a clarification on that matter at the next meeting.

3. Next steps

COM presented a timeline for the next steps and the practical organisation of API testing process. As regards, the use of DIWASS GUI, COM asked MS to provide feedback on the best ways in which COM could support them. A training session for CAs and preparing manuals and instructions is already being planned by COM. It is however impossible for COM to provide trainings to the operators. COM suggested the preparation of instruction videos, if they are considered as a useful tool by MS experts.

Answering questions raised by MS, COM:

- confirmed that it would communicate its readiness to start the API testing process by sending an email to MS experts, underlining that MS may start tests when they would be ready for that;
- indicated that CAs may use several users for conducting tests, noticing that using more than 3 users per CA can slow down the testing process;

- recalled that the scope of the tests to be performed depends on MS decision reflected by Annex I to the implementing act on the manner of accessing DIWASS by CAs and their operators, and would be established based on Annex III to that act.

One MS indicated that it would be appreciated if involved CAs would – on a voluntary basis – share test sprint results, so that the same issue does not need to be reported to COM by multiple CAs. COM thanked for this suggested and indicated it would take this request into account when creating a common space for sharing technical documentation.

Another MS also pointed out that it would make sense to perform the tests only when respective functionality is fully developed in DIWASS, to avoid the need of re-testing. COM took note of that comment.

4. Technical documentation API

COM briefly presented the scope and structure of technical documentation shared so far with MS experts, asking for feedback on these issues.

5. Any other business

No points were raised, COM was however asked to explain what type of feedback MS experts are expected to provide on the document concerning attachment labels. COM clarified that such feedback should refer to (i) the list of labels as such (labels to be added or deleted), emphasising that COM has no strong position on that list, as it facilitates CAs work, (ii) list of attachments labels to which carriers should and should not have access.

Report from meeting of Waste Expert group – Waste Shipment Regulation

20 June 2025, 9:30 – 13:00, Borchette

Participants:

- COM: DG ENV Unit B3 representatives
- Member States: AT, BE, BG, CZ, DE, DK, ES, FR, IE, IT, LV, MT, NL, PL, PT, SI, SK;
- Stakeholders: CEFIC, CEPI, Cembureau, EBRA EEB, EERA, EBRA, EIA, EPRO, ETRMA, EUBP, EUCOBAT, Eucopro, Euratex, EuRIC, EuroCommerce, Eurofer, Eurometaux, European, FEAD, HWE, ICA, ITI, MWE, Plastics Europe, PRE, Recharge, T&E, VinylPlus,

1. Introduction and adoption of agenda

COM welcomed the participants of the meeting and presented its agenda. It informed the participants that the objective of the meeting is to inform them about and discuss the state of play in the implementation of various aspects of the Waste Shipment Regulation (EU) 2024/1157 (WSR).

2. Digital procedures and DIWASS

COM presented a brief state of play as regards the implementation of the digital procedures under the new WSR, notably the development of the Digital Waste Shipment System (DIWASS). COM recalled that DIWASS will allow for direct use of the system via a Graphical User Interface (i.e. a website), as well as offer a central hub, through which the local systems operated in some MS, as well as commercial software may interconnect (via Application Programming Interface or API). For such interconnection, such systems and software should meet the interoperability criteria established in an implementing act, that is expected to be adopted by the Commission in July. COM thanked MS experts for their engagement in the intensive works to prepare this implementing act. COM presented also a timeline for next steps, indicating that, by the end of the summer, all technical documentation for the API connection will be finalised. API testing could start from second half of July for those aspects where documentation is ready. COM also explained how the training process for using the GUI is planned – MS experts will be trained by the COM, so that they can subsequently, in accordance with Article 26(4) of the implementing act on interconnection of systems, offer trainings for economic operators. Such trainings for economic operators should be expected at the earliest in 2026. Using DIWASS will become mandatory for EU operators and competent authorities (CAs) from 21 May 2026.

One Member State asked for confirmation if the inspection systems are covered by the implementing act in respect to their access to DIWASS via API and whether they need to perform tests. COM confirmed and indicated that the performing tests for inspection systems is voluntary.

Another MS sought clarifications on how the support and helpdesk will be organised. COM confirmed that it would provide support in the form of instruction manuals on the use of the system as well as a training workshop for CAs later this year with a view to instruct MS colleagues so they can prepare training for economic operators in their jurisdictions early 2026. Also, it is envisaged to open DIWASS for registration of operators well before May 2026, whereas submission of notification can only start from 21 May 2026.

One business organisation inquired about the languages in which DIWASS will be available and how confidentiality will be secured as regards the information that companies introduce in the system. COM confirmed that DIWASS would be available in all EU languages and that works on ensuring publication of information on shipments of waste in format established in Annex XII to the WSR are advancing, assuring that the confidentiality aspects regulated in this Annex are taken into account.

A few business organisations asked when the system will be available for testing and whether back up solutions are being prepared in case of technical failures, in order to ensure continuity on the ground. COM reiterated the information on trainings and explained that a number of back up elements are overall in place to safeguard the use of Commission applications, such as back up servers or helpdesk support for the platform on which DIWASS runs. In cases where the interconnection between local systems and DIWASS fails, the GUI is available as back up, also for those MS where a local system is to be used in principle.

Another business organisation expressed concern regarding the ease of access to documents by carriers and asked for flexibility by allowing carriers to present paper movement documents. The Commission explained that confidentiality of information is taken into account in both the WSR and the implementing act. It also explained that DIWASS will allow for downloading the notification and movement documents also by the carriers, so that these documents could be presented to inspection authorities, also in cases where there is no internet access.

Finally, one business organisation asked whether DIWASS will manage but more importantly harmonise the administrative fees imposed by CAs. The Commission clarified that DIWASS would not manage these fees and confirmed that as soon as a request is submitted in the system the information is available to all involved CAs.

3. Intra EU-shipments: harmonization in classification of waste for the purpose of waste shipments

COM informed that it plans to launch a [public consultation](#) in July to gather views on waste that could be green listed for intra EU shipments, including which type of e-waste could continue to be green listed, and views on criteria to distinguish green listed waste from waste subject to notification. The consultation would run until the end of October.

As regards e-waste, COM recalled that the Basel Convention includes all e-waste in its PIC procedure since 1 January 2025 and that, in the context of OECD, no agreement was reached

regarding incorporating these changes into the OECD Decision. In the EU delegated acts were adopted in 2024, to implement the Basel changes into EU law:

- prohibiting all e-waste exports to non-OECD countries from 1 January 2025;
- subjecting all exports to OECD and imports from any third country to the notification procedure;
- for intra-EU shipments hazardous e-waste remain subject to notification procedure but non-hazardous e-waste that can be classified under GC010 or GC020 are considered green listed until the end of 2026. The public consultation will contribute to identify if an extension of such regime within the EU should be pursued and how.

During the discussion, some private stakeholders questioned the relevance to justify the need for green listed shipments, underlying their importance for competitiveness but also environmental reasons and recalled that all Member States were following the same requirements and legislations and considered that it would be important to ensure that the classification in the country of origin would prevail. Another business organisation underlined the need to consider circular economy aspects while adopting criteria linked to the green listing.

COM clarified that the upcoming consultation will not affect the current green list classification but may explore expanding this classification to additional waste streams, and that such expansion would have to be duly underpinned with evidence, not only principle justification. Regarding classification mismatches between the country of dispatch and the country of destination, COM recalled that the WSR is very clear in its Article 29, confirming the long-standing policy that in cases of disagreement between the CAs the strictest approach prevails.

Some Member States enquired about the lack of implementation by one third country of the e-waste amendments of the Basel convention. COM confirmed that this country didn't opt out in the context of the Basel Convention and informed that it is in touch with the relevant authorities in order to clarify the situation.

Answering to a Member State remark, COM explained that the question of the end-of-waste criteria is gathering growing attention in the preparations of the Circular Economy Act. Some technical work is undertaken in relation to establishing such criteria for plastic waste.

4. New rules on the export of waste from the EU

The Commission indicated having received 30 requests from non-OECD countries wishing to continue importing waste from the EU, which cover different type of waste. Information about which countries applied and for which types of waste can be found on the [COM website](#).

The delegated act establishing the list of non-OECD countries to which exports of certain EU waste would be allowed after 21 May 2027 has to be adopted by 21 November 2026.

Regarding OECD countries COM recalled its role in monitoring waste movements to such countries, paying particular attention to plastic waste.

Specifically regarding plastic waste, COM reminded the participants about the requirement to apply the PIC procedure for all shipments of plastic waste, including waste classified under B3011, to 3rd countries from **21 May 2026**, as well as the upcoming ban on plastic waste shipments to non-OECD countries starting from 21 November 2026.

During the discussion, in reply to an environmental NGO, COM explained that it -among other elements- looks at the non-OECD countries' treatment capacities and confirmed that stakeholders are invited to share with COM data and information about applicant countries regarding the waste management situations.

Participants raised questions on the audit obligations, also for Member States, the qualifications of auditors and about possibilities to use audit reports commissioned in the context of other notifications. Some stakeholders indicated that further guidance is needed to ensure fair competition and asked about the state of play on bilateral agreements within the OECD to waive audit obligations. One stakeholder underlined that preparing for the audits would be challenging in practice, taking into account that this obligation starts to apply only 6 months after the list is established for non-OECD countries to which exports of certain waste from the EU will be allowed.

COM clarified that the responsibility to comply with the audit obligations lies with the EU exporter and that an audit report can be referred to in multiple shipments, provided that they comply with requirements of Article 46 and Annex X to the WSR. COM underlined that the audit register it will manage, will provide information about companies that have been audited, while the reports will not be in that register and there will also not be an active role for COM to check these audit reports. The audit report is one piece of information to be assessed by the CAs in the context of notification procedures or green-listed movements of waste. Waving the obligation for audits in the OECD would be possible only under international agreement between the EU and other countries. COM also recalled, that the audits do not need to be performed by EU accredited companies. National accreditation in the country of destination is possible.

COM invited the participants to provide their views on the scope and content of potential guidance regarding the audit obligations by 15 September.

5. Enforcement

COM briefly reported back from the first meeting of the Waste Shipment Enforcement Group (WSEG). This meeting exchanged operational experiences, and confirmed the need for increased coordination to address illegal shipments of waste at national and supranational levels. A Member State underlined the importance to include all relevant national competent authorities in this group and to foster communication.

6. Any other business

COM used the meeting also as an opportunity to recall the transitional rules of Article 85(3), (5) and (6) of the WSR. COM underlined that according to these provisions, if a notification is

submitted before 21 May 2026, and the CA of destination acknowledges it, the Waste Shipment Regulation (EC) 1013/2006 applies to such notification procedure. Also, the treatment of waste should be completed by 21 May 2027 or – in case of pre-consented facilities – by 21 May 2029. COM pointed out that the notifiers should bear it in mind when deciding if to submit notification under the former WSR, or do it via DIWASS after 21 May 2026, in which case such limitations on the treatment of shipped waste do not apply. COM underlined also, that notifications that were submitted by 21 May 2026, but the CA of destination did not provide its acknowledgement before that date, should be resubmitted in DIWASS by the notifiers.