To the kind attention of

Jessika Roswall
Commissioner for Environment,
Water Resilience and a Competitive Circular Economy
Jessika.ROSWALL@ec.europa.eu

20/03/2026

SUBJECT: Ensuring a smooth implementation of new EU waste shipment rules

Dear Commissioner Roswall,

The new Waste Shipment Regulation entered into force on 20 May 2024, with most of its provisions—including critical operational requirements—set to apply from 21 May 2026. Among these are the mandatory electronic submission and exchange of information and documents, as well as the obligation to complete the Annex VII form at least two working days before the start of the shipment.

After the entry into force of the new waste shipment rules, the Clean Industrial Deal has materialised the EU's ambition to be the global leader in the circular economy by 2030, while the Commission has set a course to simplify rules to make the EU's economy more competitive and prosperous. We thus remind that waste shipments are a cornerstone of the EU's circular economy but also a significant source of administrative burden.

As the imminent application of these new rules approaches, certain aspects—particularly those related to electronic procedures and Annex VII documentation—remain a persistent source of concern for European value chains. To mitigate potential disruptions, we, the undersigned European industry stakeholders, representatives of key European value chains, respectfully urge the Commission to ensure a smooth and efficient implementation of the Regulation, especially for intra-EU waste shipments.

In particular, we have two key requests to facilitate this transition:

1. **A transition/adaptation period for the implementation of the Digital Waste Shipment System (DIWASS)**

European industry strongly supports the digitalisation of procedures as a means to enhance efficiency and traceability. However, the introduction of the Digital Waste Shipment System (DIWASS) presents significant operational and technical challenges, as demonstrated by the experiences of Member States in implementing similar digital systems.

While fully supporting the importance of the timely implementation of DIWASS as a key tool for harmonisation and transparency, we respectfully urge the European Commission to lead the establishment a transition/adaptation period of at least one year for the EU-wide implementation of DIWASS. This period would allow authorities and businesses to adapt to the new system without facing penalties for non-compliance during that initial phase.

Enforcing digital submission requirements from 21 May 2026 —particularly for Annex VII forms—could disproportionately impact businesses and authorities still adapting to the new system. This is especially true for smaller operators with limited resources and those operating across multiple jurisdictions, where compliance complexity is heightened by varying national approaches.

EU countries have already granted similar transition periods for their own digital systems to ensure smooth adoption and minimise disruptions. This approach aligns with the Commission's goal of fostering a seamless digital transition while upholding environmental and administrative objectives.

While the Commission's influence over Member States' enforcement decisions is limited, we encourage the Commission to lead and coordinate a harmonised approach among Member States. The Waste Shipment Regulation already provides a possible legal basis for such a transition in Article 16(4), which allows for alternative means of document availability when digital systems are inaccessible. **The Commission should encourage a common understanding among EU Member States that the year after the mandatory implementation of DIWASS entails a situation in line with Article 16(4), extending the same possibility to Annex VII shipments**.

When Regulation (EU) 2024/1157 was adopted, a 24-month implementation period was foreseen to allow authorities and operators to adapt to the new digital system. In practice, however, preparation has been delayed: the DIWASS implementing rules were only adopted in July 2025, key technical documentation for system integration was only published at the end of January 2026, the user interface is not yet operational, and pre-registration of the thousands of affected operators has not begun. As a result, operators are left with only a few months to adapt to a complex new system, making a transitional period essential. In addition, automated interconnections between company IT systems and DIWASS (or equivalent national tools) are needed to reduce transition costs, avoid duplicate data entry, and ensure that digitalisation delivers real operational added value.

Specifically, **we propose that during a transition period of one year, operators unable to fully comply with DIWASS** (e.g., due to technical limitations or where relevant operators in the shipment chain are not yet registered in the system) **should be permitted to submit and make available required documents in the transport vehicle via alternative means** (e.g., having a physical Annex VII document available in the transport vehicle or submitting it via post, fax, or email, with or without digital signatures in line with Article 72), **without facing penalties**. In such cases, the notifier or person who arranges the shipment should ensure that the information and documents are submitted via DIWASS, but full coverage cannot be expected as the system may not be available to all operators. Ensuring a common understanding and harmonised application of such transition period is essential to maintain a level playing field across the EU.

Finally, as the new Annex VII (from 21 May 2026) requires more signatures and is clearly designed for digital purposes, using it in paper format would be impractical. We therefore suggest continuing using the current Annex VII for paper procedures and reserve the new form for DIWASS.

2. The repeal of the requirement to submit Annex VII two days in advance

The new Waste Shipment Regulation (WSR) aims to strengthen enforcement and prevent illegal waste shipments, a goal the industry fully supports. However, **the requirement to submit the Annex VII form two working days before shipment (Article 18 WSR) imposes a disproportionate logistical constraints and administrative burden on operators**, conflicting with the EU's broader objectives of efficient intra-EU shipments and circular economy development.

This requirement is unrealistic and impractical, particularly for green-listed intra-EU waste shipments, where logistics are often planned hours in advance to meet customer demands or optimize transport efficiency. In other cases, planning in advance may simply not be always possible, as is the case for shipments via barges. **The issue is especially acute in border regions, where spontaneous shipments are common to avoid empty return trips.** Moreover, this provision impedes immediate take-back when shipments are refused by a receiving facility because Article 23(3) WSR refers to the procedure in Article 18.

Contrary to the Commission's objectives, **this measure undermines the competitiveness of circular products compared to virgin materials**, which are not subject to similar administrative burdens. It also disrupts basic waste management services to businesses. As an example, printing companies generate trim waste that is collected on demand—often within hours—when onsite containers reach capacity. Planning such collections two days in advance is operationally unfeasible and would force printing businesses to either increase onsite waste storage capacity at significant cost, or anticipate orders and the waste generation linked to those, neither of which is practical nor efficient while hampering the European economy and value chains.

Under such conditions, two likely outcomes emerge—both of which fail to deliver any environmental benefit. On the one hand, businesses may be compelled to switch to national waste management providers, even if cross-border partners offer better value in terms of cost, quality, recycling efficiency or proximity. This undermines the principles of the EU single market and the economies of scale that are essential for a thriving circular economy. On the other hand, operators could resort to a systematic prefill of Annex VII forms based on estimates, which then may or may not be used. This is possible as the quantity of the waste, the carrier and the container identification number can still be submitted before the start of the shipment. However, this not only represents unnecessary administrative burden but brings no added value to controls as those prefilled forms will not always reflect real shipments.

As a matter of fact, registering data online in DIWASS will already exponentially increase the information available for control authorities. Digital tracking via DIWASS provides authorities with real-time data on shipments, enabling better-targeted controls based on patterns and actual movements. **We therefore call on EU legislators to repeal the requirement to submit Annex VII two days in advance.** Furthermore, **Article 18(5) WSR must be amended** to reflect operational realities **by allowing estimated quantities** in Annex VII forms **before departure**. *Actual* quantities can only be confirmed upon arrival at the weighbridge of the receiving facility. These changes would reduce unnecessary burdens, support the circular economy, enhance legal certainty and maintain the competitiveness of EU businesses—all while still ensuring effective enforcement against illegal shipments. Finally, overly rigid procedures could create economic risks for recycling markets, potentially discouraging investment and undermining collection and sorting activities essential to the circular economy.

On behalf of the undersigning associations, we thank you for your time and consideration of our requests. We sincerely appreciate your attention to these matters and would be grateful for any updates or feedback at your earliest convenience.

Please do not hesitate to contact us if further information is required. We look forward to your positive response.

Yours sincerely,

Jori Ringman
Director General of Cepi
j.ringman@cepi.org
+32 2 627 49 19

Mike Jefferson
Managing Director
EPRO
mike.jefferson@epro-plasticscircularity.org
+32 474 23 34 49

Axel Eggert
Director General of
EUROFER
directorgeneral@eurofer.be
+32 2 738 79 37

Dr James Watson
Director General European Metals
watson@european-metals.eu
+32 497 581 368

Joachim Quoden
Managing Director
EXPRA
Joachim.quoden@expra.eu
+49 171 201 70 55

Paolo Campanella
Secretary General of FEAD
paolo.campanella@fead.be
+32 470 70 38 32

René Schroeder
Secretary General of Ferver
rschroeder@ferver.eu
+32 485 15 93 40

Bertrand Cazes
Secretary General of Glass for Europe
bertrand.cazes@glassforeurope.com
+32 485 31 03 86

Cédric Janssens
Secretary General of Glass Fibre Europe
cedric.janssens@glassfibreeurope.eu
+32 497 39 24 32

Anna-Maria Karjalainen
Head of EU Regulatory Affairs and Deputy Director-General of ICA EU
annamaria.karjalainen@internationalcopper.org
+32 489 09 06 08

Virginia Janssens
Managing Director of Plastics Europe
virginia.janssens@plasticseurope.org
+32 475 45 57 93

Julia Ettinger
Secretary General of Recycling Europe
jettinger@recyclingeurope.org
+32 489 09 08 95

Charlotte Röber
Managing Director of VinylPlus
charlotte.roeber@vinylplus.eu
+32 486 85 96 02

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also biochemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 85% of our raw materials are sourced from within the European Union, 92% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 70.5% At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 25 billion value addition to the European economy and €5 billion investments annually. Through its 19 national associations, Cepi gathers 490 companies operating 870 mills across Europe and directly employing more than 180,000 people.

Avenue Louise, 250 Box 80 | B-1050 Brussels | Belgium
+32 2 627 49 11 - mail@cepi.org

EPRO is an association focussing on plastics circularity. EPRO is represented in 12 EU Member States and two non-EU countries in the European Free Trade Association (EFTA) where EU laws apply. Members consist of collection systems for plastics packaging and agricultural plastics, extended producer responsibility (EPR) organisations, and national plastics circularity associations. EPRO provides a platform for sharing of technical expertise and best practice helping to facilitate the move towards a more circular economy for plastics.
For more information, visit https://epro-plasticscircularity.org/

Kon. Astridlaan 59/Bus 5 B, 1780 Wemmel, Belgium

EUROFER AISBL is located in Brussels and was founded in 1976. It **represents the entirety of steel production in the European Union**. EUROFER full members are steel companies and national steel federations throughout the EU. The major steel companies and national steel federations in Turkey, Ukraine and the United Kingdom are members. The European Steel Association is recorded in the EU transparency register: 93038071152-83.

Avenue de Cortenbergh 172,
1000 Brussels, Belgium
+32 2 738 79 20 - mail@eurofer.eu

European Metals is an umbrella association representing the interests of the combined non-ferrous metals industry towards EU policy makers. We bring together the companies and associations shaping Europe's non-ferrous metals ecosystem: from upstream mining and refining to downstream use and high-quality recycling. By connecting technical expertise with policy action, we ensure that the importance of the metals sector is recognised, valued, and that our sector's future is secured. For more information, visit our website: https://european-metals.eu/

Avenue de Tervueren 168 1150 Brussels, Belgium
+32 2 775 63 11 info@european-metals.eu

EXPRA (Extended Producer Responsibility Alliance) is the alliance of 38 non-profit packaging and packaging waste recovery and recycling organisations, (including 21 EU Member States and two non-EU countries in the European Free Trade Association (EFTA) where EU laws apply) founded and run by or on behalf of obliged industry. Acting as the authoritative voice and common policy platform for its members, EXPRA represents industry-led Extended Producer Responsibility (EPR) systems at European and international level. For more than 30 years, EXPRA members have co-organised the collection, sorting, and recycling of used packaging, enabling obliged industry to fulfil its legal take-back and recycling obligations efficiently and effectively. EXPRA promotes and defends EPR as a proven, industry-driven approach to sustainable packaging waste management and serves as a key contact point for EU and international institutions.

Avenue des Olympiades 2, 1140 Brussels, Belgium
+49 171 201 70 55 - info@expra.eu

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 21 national waste management federations and 3,000 waste management companies. FEAD represents the entire waste management value chain, including waste collection, sorting, energy recovery and final disposal. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 500,000 local jobs, fuelling €5 billion of investments into the economy every year.

Rue de la Science 23, 1040 Bruxelles, Belgium
+32 2 732 32 13 – info@fead.be

As the **European federation of glass recycling companies, FERVER** brings together industry leaders from 20 countries and its members are, amongst others, responsible for recycling around 70% of Europe's packaging glass waste into high-quality cullet – a key raw material used to produce new glass products. FERVER members recycle both container glass and flat glass. FERVER therefore plays a vital role in closing the loop for glass and advancing circularity across Europe.

Rue de la Science 23, 1040 Bruxelles, Belgium
+32 2 757 91 70 - info@ferver.eu

Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances. Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain Glass Industry and Şişecam, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.

Avenue des Arts 3-4-5, 1210 Brussels, Belgium
+32 2 538 43 77 - info@glassforeurope.com

Glass Fibre Europe, founded in 1987, is the voice of the European continuous filament glass fibre industry. It is composed of 7 companies: 3B the fibreglass company, Envalior, FYSOL SAS, Johns Manville, Owens Corning, Valmiera Glass, and Saint-Gobain Vetrotex. Glass Fibre Europe represents all the major producers of continuous filament glass fibre in Europe. The continuous filament glass fibre industry is the cornerstone of the glass-based composite materials and technical textiles value-chains. Glass fibre's unique properties enable the production of wind energy, electric and electronic devices, and the development of sustainable solutions in a wide range of applications, such as transport and construction.

Avenue des Arts 3-4-5, 1210 Brussels, Belgium
+32 478 18 53 08 - info@glassfibreeurope.eu

The International Copper Association Europe is the leading advocate for the copper industry in Europe and the European arm of the International Copper Association (ICA). Our members mine, smelt, refine and recycle copper for use across the economy, in the electricity system, buildings, transport and industry.

Avenue de Tervueren 168, b-10, 1150 Brussels, Belgium. +32 2 777 7070 - frosina.velkovska@copperalliance.org

Plastics Europe is the pan-European association of plastics manufacturers with offices across Europe. For over 100 years, science and innovation have been the DNA that cuts across our industry. With members producing over 90% of all polymers across EU27+3 (Norway, Switzerland, UK) we are the catalyst for the industry with a responsibility to openly engage with stakeholders and deliver solutions which are safe, circular and sustainable. We are committed to implementing long-lasting positive change

Rue Belliard 40, Box 16, 1040 Brussels, Belgium
+32 (0)2 792 30 99 - info@plasticseurope.org

Recycling Europe (formerly EuRIC) is the voice of Europe's recycling industry, including 80 national federations and companies across 24 EU & EFTA countries. From metals and paper to plastics, textiles, tyres, ships, construction & demolition waste and WEEE, our members transform waste into resources—powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness and sustainable industrialisation across the continent.

Boulevard Auguste Reyers 70, Bulding B 1030 Brussels, Belgium
+ 32 485 97 08 71 - info@recyclingeurope.org

VinylPlus is the European voluntary commitment to sustainable development of the European Polyvinyl Chloride (PVC) industry. We represent a unique value chain built over more than 25 years of continuous investment, bringing together companies from across all stages of PVC production, use, and recycling, with a complete production and recycling footprint established in Europe. VinylPlus empowers a future-proof PVC value chain by supporting and challenging its partners companies in achieving their sustainability goals, and by being backed by trusted, science-based data.

Avenue de Cortenbergh 71, 1000 Brussels, Belgium
+32 (0)2 329 51 05 - info@vinylplus.eu