

30 November 2015

Re COP-12 Decision BC-12/1: comments on Annex IV

Here below we provide our initial comments and proposed text changes for rewording the UN-EP Basel Convention Annex IV, particularly as terms have evolved since the late 1980ies, and the terms used to describe Annex IV "Operations" are focussed on materials rather than on articles. Proposed text changes are highlighted in the Annex Title, the Section titles and the content of Section B as:

Annex Title

ANNEX IV
DISPOSAL **or RECOVERY** OPERATIONS

Section A Title

Option 1

A. **FINAL DISPOSAL** OPERATIONS

Option 2

A. **FINAL DISPOSAL** OPERATIONS WHICH DO NOT LEAD TO THE POSSIBILITY OF
RESOURCE: **REGENERATION**; **RECYCLING**; **RECLAMATION**; OR ALTERNATIVE USES

Section B Title

Option 1

B. **RECOVERY** OPERATIONS

Option 2

B. **RECOVERY** OPERATIONS WHICH MAY LEAD TO RESOURCE: **REGENERATION**;
RECYCLING; **RECLAMATION**; OR ALTERNATIVE USES

Content of Section B

R1 Use as a fuel (other than in direct incineration) or other means to generate energy

R2 Solvent reclamation **or** regeneration

R3 Recycling **or** reclamation of organic substances which are not used as solvents

R4 Recycling **or** reclamation of metals and metal compounds

R5 Recycling **or** reclamation of other inorganic materials

R6 Regeneration of acids or bases

R7 Recovery of components used for pollution abatement

R8 **Regeneration or** reclamation of components from catalysts

R9 Used oil re-refining or other **uses** of previously used oil

R10 Land treatment resulting in benefit to agriculture or ecological improvement

R11 Uses of residual materials obtained from any of the operations numbered R1-R10

R12 Exchange of wastes for submission to any of the operations numbered R1-R11

R13 Accumulation of material intended for any operation in Section B

The respective UN-EP Basel Convention Technical Guidelines descriptions and explanations should be considered when elaborating the above "R list" e.g. for R4 see: "Technical guidelines on the environmentally sound recycling/reclamation of metals and metal compounds (R4)" - Adopted by decision VII/14 of the seventh meeting of the Conference of the Parties to the Basel Convention (Geneva, October 2004)

Yours sincerely,

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