**Working document for Annex IV.B**

**Decision BC-13/2: Mandate for the review of Annex IV**

1. Improve/update the description of disposal operations in Annex IV; and,
2. Improve environmental controls by including additional disposal operations that occur in practice or could occur in practice in Annex IV.

**How to use this document:** Please complete the table with your comments, including ‘problem statement’, ‘proposed change’ and ‘rationale’. Leave blank if no change is required. **Bold** **and** **underline** for additions and strikethrough (e.g., ~~strikethrough~~) for deletion of text.

**Submitting member/observer: Khokan Bagchi (Australia)**

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| **A** | **B** | **C** | **D** | **E** |
| **Annex IV.B** | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| **Caption text**B. OPERATIONS WHICH MAY LEAD TO RESOURCE RECOVERY, RECYCLING RECLAMATION, DIRECT RE-USE OR ALTERNATIVE USES | (1) The major headings do not identify the two principal class of disposal: Recovery.  | **RECOVERY OPERATIONS:** OPERATIONS WHICH MAY LEAD TO RESOURCE RECOVERY, RECYCLING RECLAMATION, DIRECT RE-USE OR ALTERNATIVE USES | Addition of the sub-heading “Recovery operations” succinctly conveys key information about the general nature of the operations that are included in this category. | None of the disposal operations appear to fall under direct re-use. |
| **Introductory text** Section B encompasses all such operations with respect to materials legally defined as or considered to be hazardous wastes and which otherwise would have been destined for operations included in Section A |  | Section B ~~encompasses~~ covers ~~all such~~ operations ~~with respect to materials legally defined as or considered to be hazardous wastes and which~~ used to recover or recycle wastes ~~which~~ **that**otherwise would have been destined for operations included in Section A |  |  |
| **General comments** |
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| **A** | **B** | **C** | **D** | **E** |
| Disposal operation | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| **R1** | Use as a fuel (other than in direct incineration) or other means to generate energy |  |  |  |  |
| **R2** | Solvent reclamation/regeneration |  |  |  |  |
| **R3** | Recycling/reclamation of organic substances which are not used as solvents |  |  |  |  |
| **R4** | Recycling/reclamation of metals and metal compounds |  |  |  |  |
| **R5** | Recycling/reclamation of other inorganic materials |  |  |  |  |
| **R6** | Regeneration of acids or bases |  |  |  |  |
| **R7** | Recovery of components used for pollution abatement | This requires further explanation |  |  |  |
| **R8** | Recovery of components from catalysts |  |  |  |  |
| **R9** | Used oil re-refining or other reuses 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 | This requires further explanation | Delete, or explain further what this operation entails | This seems to be covered by R13. |  |
| **R13** | Accumulation of material intended for any operation in Section B |  |  |  |  |
| **General comments** |
| There is scope to classify some operations under more than one Disposal operation for some materials, e.g., R8/R4, R6/R5 and R9/R3. However, it may be best to retain these overlapping operations and leave it to competent authorities to ensure that, where there are multiple options, the most relevant (specific) one is chosen. |
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| **A** | **B** | **C** |
| **New R operation** | **Rationale** | **General comments** |
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| **Overarching comments** |
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