**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:**

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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 | The caption at present does not help explain the key distinction between Annex IVA and IVB operations. | **Recovery Operations** | A clear distinction should be made between the operations in sections A and B. | The definition of the term “Recovery” may be provided as a footnote with explanatory notes.Glossary of terms (UNEP/CHW/OEWG.10/INF/10). |
| **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 ~~all such operations with respect to materials legally defined as or considered to be hazardous wastes and which otherwise~~ **operations used to recover o recycle wastes** which otherwise would have been destined for operations included in Section A. | The proposed change aims to harmonize the introductory text of Annex IVA and IVB |  |
| **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 |  | Use as a fuel (other than in direct incineration) or other means to generate energy **(eg.co-processing of hazardous waste as alternative fuels and/or raw materials.)** |  | According to the Technical guidelines on the environmentally sound co‑processing of hazardous wastes in cement kilns, co-processing is the use of alternative fuel and/or raw materials for the purpose of energy and/or resource recovery. This differs from co-incineration, the production of materials while using wastes as fuel or the plant in which waste is thermally treated for the purpose of disposal. |
| **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 | The operation is not clear, confusing redaction. |  | The description should be more precise. | Some examples or technical details of this operation as a footnote would be very useful. |
| **R8** | Recovery of components from catalysts |  |  |  |  |
| **R9** | Used oil re-refining or other reuses of previously used oil |  | **~~Used oil re-refining or other reuses of previously used oil.~~** **Recovery of used oil.** |  | This operation is maybe overlapping with R1. |
| **R10** | Land treatment resulting in benefit to agriculture or ecological improvement | This operation is overlapping with D2. |  |  | This operation should be merge with operation D2 in Annex IVA or further details should be provided as a footnote or explanatory note. |
| **R11** | Uses of residual materials obtained from any of the operations numbered R1-R10 |  |  |  | Further details could be introduced in a explanatory note or as a footnote in order to clarify the type of operations involve in this operation.  |
| **R12** | Exchange of wastes for submission to any of the operations numbered R1-R11 |  |  |  | Further details could be introduced in a explanatory note or as a footnote in order to clarify the type of operations involve in this operation (for the term exchange). |
| **R13** | Accumulation of material intended for any operation in Section B | This operation needs clarification for the terms “storage” and “accumulation” in relation to its mirror entry D15. | ~~Accumulation~~ ~~of material intended for~~ **Storage pending any operation in Section B** | It is important to harmonize the terminology. |  |
| **General comments** |
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| **A** | **B** | **C** |
| **New R operation** | **Rationale** | **General comments** |
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| **Overarching comments** |
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