**Working document for Annex IV.A**

**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: Owen Cox**

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| **A** | **B** | **C** | **D** | **E** |
| **Annex IV.A** | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| **Caption text**1. OPERATIONS WHICH DO NOT LEAD TO THE POSSIBILITY OF RESOURCE RECOVERY, RECYCLING, RECLAMATION, DIRECT RE-USE OR ALTERNATIVE USES
 | Overly long. The word ‘possibly’ is imprecise and the ‘direct re-use or alternative uses’ provides confusion as to boundary between waste and non-waste.  | Replace with:**Final disposal operations** | The caption is short and indicates what D codes are for: the different disposal operations/methods. |  |
| **Introductory text** Section A encompasses all such disposal operations which occur in practice. |  |  |  |  |
| **General comments** |
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| **A** | **B** | **C** | **D** | **E** |
| Disposal operation | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| **D1** | Deposit into or onto land, (e.g., landfill, etc.) | Present D1 includes operations covered by D2 to D5 (especially D5 because landfill is the example) and D12 | Deposit into or onto land, ~~(e.g., landfill, etc.)~~ **(excluding D2 to D5 and D12)** | The codes are easier to use if they avoid overlap. | Note that deposit in landfills that don’t meet the standards of D5 should remain D1. |
| **D2** | Land treatment, (e.g., biodegradation of liquid or sludgy discards in soils, etc.) |  |  |  |  |
| **D3** | Deep injection, (e.g., injection of pumpable discards into wells, salt domes of naturally occurring repositories, etc.) |  |  |  |  |
| **D4** | Surface impoundment, (e.g., placement of liquid or sludge discards into pits, ponds or lagoons, etc.) |  |  |  |  |
| **D5** | Specially engineered landfill, (e.g., placement into lined discrete cells which are capped and isolated from one another and the environment, etc.) |  |  |  | See suggestions for D1. |
| **D6** | Release into a water body except seas/oceans |  |  |  |  |
| **D7** | Release into seas/oceans including sea-bed insertion |  |  |  |  |
| **D8** | Biological treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by means of any of the operations in Section A |  |  |  |  |
| **D9** | Physico chemical treatment not specified elsewhere in thisAnnex which results in final compounds or mixtures which are discarded by means of any of the operations in Section A, (e.g., evaporation, drying, calcination, neutralization, precipitation, etc.) |  |  |  |  |
| **D10** | Incineration on land |  |  |  |  |
| **D11** | Incineration at sea |  |  |  |  |
| **D12** | Permanent storage (e.g., emplacement of containers in a mine, etc.) |  |  |  | New Zealand asbestos disposal rules require asbestos to be in landfills (in isolated cells) meeting D5 but the asbestos is also buried in containers. This should be D5 rather than D12.D12 should be used for wastes that are likely to be more mobile (eg mercury wastes) and subject to more intensive on-going management. |
| **D13** | Blending or mixing prior to submission to any of the operations in Section A |  |  |  |  |
| **D14** | Repackaging prior to submission to any of the operations in Section A |  |  |  |  |
| **D15** | Storage pending any of the operations in Section A |  | Storage **or consolidation of wastes** pending any of the operations in section A. |  | NZ often imports hazardous wastes from island nations and adds this to similar NZ hazardous wastes to enable a larger shipment to offshore processing/disposal operations where we cannot treat the waste within NZ.  |
| **General comments** |
| I note in the in the pdf file on comments that there are suggestions that a number of D codes be deleted as they are not environmentally sound. This should not happen. As the current notes the D codes ‘encompasses all such disposal operations which occur in practice’. The decision on whether transboundary movement meets the requirement of environmentally sound management is not determined by the code (though the code helps in this decision).  |
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| **A** | **B** | **C** |
| **New D operation** | **Rationale** | **General comments** |
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| **Overarching comments** |
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