



04 October 2024

DR. ROLPH PAYET

Executive Secretary

Basel, Rotterdam and Stockholm Conventions Secretariat

UNITED NATIONS ENVIRONMENT PROGRAMME

International Environment House 1,
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Geneva, Switzerland
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Subject: **INCLUSION OF WASTE COVERED BY THE BASEL
CONVENTION IN THE HARMONIZED COMMODITY
DESCRIPTION AND CODING SYSTEM**

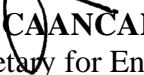
Dear **Dr. Payet**:

This has reference to your letter with IIS Transaction No. CO-2024-015457 regarding the invitation for comments on the inclusion of waste covered by Basel Convention in the Harmonized Commodity Description and Coding System classified by the World Customs Organization.

In this regard, respectfully endorsed herewith the comments and inputs attached in **Annex A**. Likewise, may we request for an account in the WCO Trade Tools (<https://www.wcotradetolls.org/en/harmonized-system>) to access the legal and explanatory notes of the harmonized system.

We hope to have provided you with the needed inputs. Thank you.

Very truly yours,


JACQUELINE A. CAANCAN, CESO III
OIC-Assistant Secretary for Environment
and concurrent EMB Director

Digitally signed by:
Caancan Jacqueline
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DN: CN = Caancan
Abing C =
PH.O = Environmental
Management Bureau



CO-2024-015457

ANNEX A

I. Information with respect to A1010, A1020, A1030 and A1040 – Metal wastes/compounds

Section XV – Base Metals and Articles of Base Metals

Note 8(a):

- *Arsenic, Mercury, Selenium, and Tellurium shall cover in this note.*
Create additional chapter for “Arsenic and articles thereof”

Chapter 77. Chapter text

Delete and Substitute:

“Chapter 77 Mercury and articles thereof”

Heading 77.01. Heading Text

Input:

“Mercury and Mercury compound waste”

Chapter 81.

Heading 81.12. Heading Text.

Delete and Substitute:

“Beryllium, chromium, hafnium, rhenium, thallium, cadmium, germanium, vanadium, gallium, indium and niobium (columbium), selenium, tellurium and articles of these metals, including waste and scrap.”

Subheading 8112.70. Subheading Text.

Input:

“Selenium and articles thereof, including waste and scrap.”

Subheading 8112.71. Subheading Text

Input

“Waste and scrap.”

Subheading 8112.80. Subheading Text

Input:

“Tellurium and articles thereof, including waste and scrap.”

Subheading 8112.81. Subheading Text

Input

“Waste and scrap.”

Section VI – Products of the Chemical or Allied Industries

Chapter 28. Chapter text

Delete and Substitute:

“Inorganic chemicals; organic or inorganic compounds of precious metals, of rare-earth metals, of radioactive elements or of isotopes, and metal carbonyl”

Note 9. Note Text

Additional Note:

“Metal carbonyls are complexes or compounds of transition metals with carbon monoxide ligands. It acts as an important function in various applications such as organic synthesis, high-purity metal production, homogenous catalysis and etc.”

Chapter 28.VII. Chapter Heading Text

Additional Input:

“METAL CARBONYL”

Heading 28.54. Heading Text

Input:

“Tetracarbonylnickel”

Subheading 2854.1. Subheading Text

Input:

“Tetracarbonylnickel, including waste.”

Heading 28.55. Heading Text

Input:

“Pentacarbonyliron”

Subheading 2855.1. Subheading Text

Input:

“Pentacarbonyliron, including waste.”

Heading 28.56. Heading Text

Input:

“Octacarbonyldicobalt”

Subheading 2856.1. Subheading Text

Input:

“Octacarbonyldicobalt, including waste.”

Heading 28.57. Heading Text

Input:

“Other metal carbonyls”

Subheading 2857.1. Subheading Text

Input:

“Other metal carbonyls, including waste.”

II. Information with respect to A4030 – Wastes from production, formulation and use of biocides and phytopharmaceuticals, including waste pesticides

Section VI – Products of the Chemical or Allied Industries

Chapter 38.

Note 6 (e). Note Text.

Input:

“Waste from production, formulation and use of biocides and phytopharmaceuticals, including biocides and phytopharmaceuticals”

Heading 38.08. Heading Text

Delete and Substitute:

“Insecticides, rodenticides, fungicides, herbicides, anti-sprouting products and plant-growth regulators, disinfectants, biocides, phytopharmaceuticals and similar products, put up in forms or packings for retail sale or as preparations or articles (for example, sulphur-treated bands, wicks and candles, and fly-papers).”

Subheading 3808.9.

Subheading Note. Note Text.

Additional Input:

“(a) Biocides are substances with microorganisms that kills or controls or neutralize the growth of living organisms such as bacteria, fungi, viruses molds or insects.”

“(b) phytopharmaceuticals are plant-derived compounds in pharmacological activities.”

“(c) All biocides and phytopharmaceuticals under heading 3808.9 are limited to pesticides use.”

Subheading 3808.95. Subheading Text.

Input:

“--Biocides”

Subheading 3808.95. Subheading Text.

Input:

“--Phytopharmaceuticals”

Heading 38.25.

Subheading 3825.6.

Subheading 3825.62. Subheading Text.

Input:

“Wastes from biocides production”

Subheading 3825.63. Subheading Text.

Input:

“Wastes from phytopharmaceuticals production”

III. Information with respect to B1250 – Waste end-of-life motor vehicles, containing neither liquid nor other hazardous components

Section XVII – Vehicles, Aircraft, Vessels and Associated Transport Equipment

Note 4 (d). Note Text

Additional Input:

“Waste End of Life Vehicles (ELV) are any motor vehicles and components classified as waste. ELV can be identified if a person/entity/owner intended to discard or abandon or is required to discard for recycling. On the other hand, used vehicles, also known as pre-owned or secondhand cars, have previously been possessed by retail owners where the vehicle can still be utilized. These vehicles can be bought through outlet franchises, vehicle dealers, or leasing vehicles. All the waste End-of-Life Vehicles are included in Chapter 87.”

Chapter 87.

Subheading 8701, 8702, 8073, 8704, 8705, 8709, 8710, 8711, 8712, 8713, 8715, 8716.

Input in each subheading:

“Waste end-of-life vehicles, including scraps.”

Additional input for B3140 – Waste pneumatic tyres

Section VII – Plastics and Articles Thereof; Rubber and Articles Thereof

Chapter 40.

Heading 40.11

Note. Note Text

Additional Note:

“Waste pneumatic tyres shall include in Heading 4011”

Subheading 4011.10, 4011.20, 4011.30, 4011.40, 4011.50, 4011.70, 4011.80, 4011.90.

Input in each subheading:

“-waste tyres”

VII. Information with respect to A4080 – Wastes of an explosive nature (but excluding such waste specified on the List B)

Section VI – Products of the Chemical or Allied Industries

Chapter 28.

Heading 28.29.

Note. Note Text

Additional Note:

“Most of the explosive substances derived its power from the presence of chlorine, nitrogen and oxygen in high oxidation state, that cause explosion with the strong oxidizing chemical such as chlorates and perchlorates.”

Subheading 2829.1. Subheading Text

Delete and Substitute:

“-chlorates and perchlorates”

Subheading 2829.12. Subheading Text

Input:

“—Of Sodium, waste including from explosives”

Subheading 2829.13. Subheading Text

Input:

“—Of Potassium”

Subheading 2829.14. Subheading Text

Input:

“—Of Potassium, waste including from explosives”

