

Basel Convention Expert Working Group on the review of Annexes

Working document for Annex IV.A

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

- (i) Improve/update the description of disposal operations in Annex IV; and,
- (ii) 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:

A	B	C	D	E
Annex IV.A	Problem statement	Proposed change	Rationale	General comments
<p>Caption text A. OPERATIONS WHICH DO NOT LEAD TO THE POSSIBILITY OF RESOURCE RECOVERY, RECYCLING, RECLAMATION, DIRECT RE-USE OR ALTERNATIVE USES</p>	<p>“which do not lead to the possibility of resource”, - the title is not clear and wrong. Today we have the possibility to reopen old landfills (operation D1) and recover some of the originally disposed materials.</p>	<p>Change title of annex 4 A to OPERATIONS WHICH DO NOT LEAD TO THE POSSIBILITY OF RESOURCE RECOVERY, RECYCLING, RECLAMATION, DIRECT RE-USE OR ALTERNATIVE USES Final disposal operations and pre-treatment operations leading for final disposal”</p>	<p>Technical progress. Today we have the possibility to reopen old landfills (operation D1) and recover some of the originally disposed materials.</p>	
<p>Introductory text Section A encompasses all such disposal operations which occur in practice.</p>	<p>what is the goal of this introduction ? this text should give added value to the respected value.</p>	<p>Delete the introductory text or harmonize it with a new corresponding introductory text under table IV B. Section A encompasses all such disposal operations which occur in practice.</p>		

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General comments			
<i>One point of the working group should be to define if we want to simplify the classification or if we want to have a more detailed classification list. We recommend having a discussion on it at the first meeting.</i>			
<i>It should be noted that changes in Annex IV could lead to other changes in other Annexes.</i>			

	A	B	C	D	E
	Disposal operation	Problem statement	Proposed change	Rationale	General comments
D1	Deposit into or onto land, (e.g., landfill, etc.)	The text is not clear.	Deposit into or onto land, (e.g., landfill, etc.) “Deposit in a state of the art engineered landfill.”		
D2	Land treatment, (e.g., biodegradation of liquid or sludgy discards in soils, etc.)	Unclear text, what is meant with this text?	To be either clarified or deleted. 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.)	Unclear text. Is it environmentally sound?	Either delete or clarify clearly. 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.)	Is not an environmentally sound final disposal operation	Delete 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.)	The difference between D1 and D5 is not clear.	Clarify the difference between D1 and D5. Clarify if two entries are need. Proposition: only		

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		See French translation: “aménagée” is a bit vague..	one entry (cancel D1 or D5). new text: “State of the art engineered landfill. “ Specially engineered landfill, (e.g., placement into lined discrete cells which are capped and isolated from one another and the environment, etc.) State of the art engineered landfill. “ cancel D1		
D6	Release into a water body except seas/oceans	Not environmentally sound.	Delete D6. Release into a water body except seas/oceans		
D7	Release into seas/oceans including sea-bed insertion	Not environmentally sound	Delete 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	It exists, but the text is not clear. It could also be parts. Mixture is not clear.	Improve and simplify text: Biological treatment not specified elsewhere in this Annex which results in final compounds or mixtures material which are is discarded by means of any of the operations in Section A	Residues could be discarded by an operations in section A or recycled by an operation in section B.	
D9	Physico chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are	Compounds and mixtures are not used.	Replace compounds and mixtures through material. Proposition: “Physico chemical		

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	discarded by means of any of the operations in Section A, (e.g., evaporation, drying, calcination, neutralization, precipitation, etc.)		treatment which results in material which are then discarded in operation of section A (in D1, D2)” Physico-chemical 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, (e.g., evaporation, drying, calcination, neutralization, precipitation, etc.)		
D10	Incineration on land	Not clear enough. Need of to add state of the art plants. If the energy is recovered, then the incineration goes under Section B, “Recovery operations”.	Incineration on land Incineration on land in a state of the art incineration plant without energy and heat recovery	Need of to add state of the art plants. If the energy is recovered, then the incineration goes under Section B, “Recovery operations”.	
D11	Incineration at sea	Clarify if it still exists. To be discussed.	Incineration at sea Delete or change with “Incineration at sea in a state of the art incineration plant without energy and heat recovery		
D12	Permanent storage (e.g., emplacement of containers in a mine, etc.)	Text is not clear.	Permanent storage (e.g., emplacement of containers in a mine, etc.) “Underground permanent storage. “		

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D13	Blending or mixing prior to submission to any of the operations in Section A	Please clarify for which waste it is used. Are new methods used? We are uncertain if such operations ending in final disposal operations of section A is still needed.	Put this entry under section B or harmonize the wording with the corresponding “B” entry.		
D14	Repackaging prior to submission to any of the operations in Section A		Repackaging prior to submission to any of the operations in Section A Delete D14		
D15	Storage pending any of the operations in Section A	A limit for the storage is needed, otherwise it can last forever.	Delete or clarify the limits of the storage. At least storage should be limited in time: eg. 6 months.		
General comments					

A		B	C
New D operation		Rationale	General comments

Overarching comments			