

Basel Convention Expert Working Group on the review of Annexes

Working document for Annex IV.B

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.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	Delete “Direct reuse” Direct reuse is not a waste.	B. OPERATIONS WHICH MAY LEAD TO RESOURCE RECOVERY, RECYCLING RECLAMATION, DIRECT RE USE OR ALTERNATIVE USES New title: Recycling and recovery operations (pre-treatment operations leading for recycling and recovery)	Direct reuse is not a waste.	
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	what is the goal of this introduction ? this text should give added value to the respected value.	Delete the introductory text or harmonize it with a new corresponding introductory text under table IV A. Section B encompasses all such operations with respect to materials legally defined as or considered to be hazardous wastes and which		

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		otherwise would have been destined for operations included in Section A	
General comments			
<i>New table C: Operation leading to reuse including repair refurbishment.</i>			

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	Differentiation between cement kiln and incineration is needed.	Use as a fuel (other than in direct incineration) or other means to generate energy Use as a fuel in a cement kiln Addition of "R" entry: R* incineration with energy recovery or heat recovery or both.	If a differentiation is made between cement kiln, incinerator for urban waste, we have more information about the final disposal of the hazardous waste.	
R2	Solvent reclamation/regeneration				
R3	Recycling/reclamation of organic substances which are not used as solvents	Clarify the text.			
R4	Recycling/reclamation of metals and metal compounds	Reclamation is not used.	Recycling/ reclamation recovery of metals and metal compounds		
R5	Recycling/reclamation of other inorganic materials	Explanation needed: what is meant here? Give an example.			
R6	Regeneration of acids or bases				
R7	Recovery of components used for pollution abatement	Clarify text and give concrete examples. Pollution abatement is not clear			
R8	Recovery of components from	Improve text			

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	catalysts				
R9	Used oil re-refining or other reuses of previously used oil	Clarify second part of the text: “reuse of previously used oil”. Which reuse?			
R10	Land treatment resulting in benefit to agriculture or ecological improvement	Clarify text. What is “land” ?			
R11	Uses of residual materials obtained from any of the operations numbered R1-R10	Is this entry necessary? Clarification is needed what example exists.			
R12	Exchange of wastes for submission to any of the operations numbered R1-R11	Is unclear. Overlap with R 13.			
R13	Accumulation of material intended for any operation in Section B	This is an interim storage. Do we want this ? or should not the final disposal recycling operation be mentioned ? one possibility could be to use R13 only with combination to R1 to R10			
General comments					
<i>Use recovery instead of reclamation.</i>					

A	B	C
New R operation	Rationale	General comments

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Overarching comments