



October 30, 2018
Ms. Carla Valle-Klann
Secretariat of Basel, Rotterdam and Stockholm Conventions
International Environment House
11-13 Chemin des Anémones
1219 Châtelaine
Geneva, Switzerland

Subject: Comments on the prioritization of types of waste in the list of types of wastes submitted by Parties in response to decision BC-10/10, and revised by the Secretariat taking into account the progress made by the Harmonized System Committee

Dear Ms. Valle-Klann,

I am pleased to submit views on the prioritization of types of waste to be submitted to the Harmonized System Committee.

Canada is of the opinion that the following types of waste should be prioritized. Large volumes of these types of waste undergo transboundary movement from Canada, however, their current characterization under the WCO HS does not easily allow the differentiation of hazardous wastes versus wastes whose transboundary movement is not controlled by the Basel Convention. Therefore, we believe that improving their characterization under the WCO HS could reduce mismanagement of hazardous wastes thus leading to environmental gains.

Priority 1: A1010, A1020, A1030, A1040– Metal wastes/compounds

Rationale: There is a very large volume of these hazardous wastes undergoing transboundary movement to or from Canada. Among this volume of waste, the majority is non-hazardous. However, hazardous metal wastes/compounds are quantitatively the most significant of the waste types proposed for submission to the Harmonized System Committee. Therefore, there is a high risk for this significant hazardous stream to be mismanaged as it could be mixed/ confused with the much larger non-hazardous waste metal stream. For example, metal carbonyls or metal wastes consisting of alloys of tellurium or selenium should be more clearly identified in the HS.

Priority 2: A4030- Wastes from production, formulation and use of biocides and phytopharmaceuticals, including waste pesticides

Rationale: There is a large volume of these hazardous wastes undergoing transboundary movement to or from Canada. No distinction is currently done between wastes and goods in the use phase in the HS, so general codes of heading 38.25 are used for wastes. A new subheading would fix this issue and allow for better tracking of these wastes.

Priority 3: A3020, A3180- Waste mineral oils unfit for their originally intended use & Waste containing PCB or other polybrominated analogues

Rationale: There is a large volume of these hazardous wastes undergoing transboundary movement to or from Canada. These wastes are currently adequately identified in the HS. However, Canada would welcome an amendment to set a threshold clearly discriminating PCB-containing waste mineral oils deemed hazardous from other PCB-containing waste mineral oils under subheading

2710.91. We suggest a value of 50 mg/kg. This value corresponds to the hazardous waste threshold value under the Basel Convention.

We hope that you will find these comments useful and we look forward to participating in subsequent work on this item.

Yours sincerely,



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