

BAN comments on the revised draft practical manual for stakeholders to ensure that notifications of transboundary movements meet environmentally sound management requirements

June 30, 2019

Please find comments by Basel Action Network (BAN) below as proposed track changes in the document with explanatory notes in the text in blue italics, in inserted comments and the general comments below. The numbering will need to be changed due to a restructuring. The changes recommended and **indicated in track changes below** fall into the following primary categories:

1. Irrelevant or inappropriate references to resources. (For example, BCRCs are not likely to be the best reference for whether a local facility is environmentally sound. That is not their function and could lead to conflicts of interest.)
2. Lack of recognition that ESM cannot be defined solely by what goes on inside the facility; one needs to look at downstream waste management as well as contextual factors such as local and national infrastructure and safety nets (e.g. occupational safety and health clinics) and a robust legal framework, all of which are necessary to ensure ESM within the facility is actual and maintained.
3. Recognition that while the transit state is likely not in the best position to determine ESM operations in the importing state, the Convention also requires them to not allow the TBM if they have reason to believe it is not going to be an ESM operation or destination.
4. Failure to use terms defined in the Convention instead of new formulations with the same meaning (e.g. States concerned instead of stakeholders).
5. Reorganization of aspects into logical categories. For example, we propose sub-headers of environmental aspects to be as follows: 1. Administrative, 2. Environmental, 3. Occupational, 4. Additional Considerations. We also propose combining import and export competent authority requirements in 6 below.
6. It is important to ensure that the importing and exporting competent authorities are looking for almost the same things. For example, it makes no sense to have the exporting state doing more investigation on the matter of ESM than importing states, which is implied in the current text. Certainly, they can share information, but they are both obliged to be satisfied with the ESM situation in the importing state to fulfil their Basel obligations.

Sincerely,



Jim Puckett, Executive Director, Basel Action Network

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UNEP/CHW.14/INF/6



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Conference of the Parties to the Basel Convention
on the Control of Transboundary Movements of
Hazardous Wastes and Their Disposal
Fourteenth meeting
Geneva, 29 April–10 May 2019
Item 4 (a) (iii) of the provisional agenda*

Matters related to the implementation of the Convention:
strategic issues: development of guidelines for
environmentally sound management

**Revised draft practical manual for competent authorities of States
concerned to ensure that notifications of transboundary movements**
meet environmentally sound management requirements

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Note by the Secretariat

As is mentioned in the note by the Secretariat on development of guidelines for environmentally sound management (UNEP/CHW.14/5), the annex to the present note sets out the revised draft practical manual for stakeholders to ensure that notifications of transboundary movements meet environmentally sound management requirements prepared by the expert working group on environmentally sound management. The present note, including its annex, has not been formally edited.

* UNEP/CHW.14/1.

Annex

Draft practical manual for **competent authorities of States concerned** to ensure that notifications of transboundary movements meet environmentally sound management requirements

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I. Introduction

1. In accordance with the Basel Convention for transboundary movements (TBM) of hazardous wastes and other wastes, a Prior Informed Consent (PIC) procedure must be followed. This means that planned TBMs must be notified in advance by the exporter to all competent authorities of the countries involved and can only be undertaken if all competent authorities **of the States concerned** have given their consent to the movement **and have each ensured that** the wastes will be **managed** in an environmentally sound manner.

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2. The responsibilities of the **Parties and operators** involved in such a TBM (in particular, competent authorities, exporters and generators and disposers) are outlined in the Basel Convention. From a legal point of view, the **requirements** for planning and undertaking TBMs of hazardous wastes and other wastes are clear. However, in practice, the situation can be complex. One of the main complexities is how to ensure that the wastes subject to a TBM will be disposed of in an environmentally sound manner.

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The above changes reflect the obligation in the Convention to ensure ESM is an obligation on all Parties, and in particular the States Concerned. Further Article 4(2)e refers to "management" which is more more all-inclusive than "disposal" and includes movement, prevention, collection etc.

Stakeholders is the wrong word here as Stakeholders includes civil society, journalists, etc. Parties and operators is a better formulation. We took out the word "procedures" when discussing legal clarity as it is actually the procedures which are more difficult to understand without guidance.

II. Objective

3. This practical manual serves as a reference for decision-making related to the consent of a TBM of hazardous wastes and other wastes. The manual identifies elements of information useful in determining whether the wastes subject to a TBM will be managed in an environmentally sound manner. The manual is intended for use by competent authorities of exporting countries, and also provides guidance for consideration by the competent authorities of importing and transit countries.

3bis. Users should take note that the obligation to ensure environmentally sound management is not the only obligation that must be fulfilled prior to a TBM taking place. First, Attention should be drawn to whether the export has been prohibited (e.g. by the Ban Amendment when it enters into force, as well as by national law (as reported to the Basel Secretariat) and regional (Article 11 agreements). Attention should also be drawn also to the other key obligations under Article 4, including Article 4(1)b, (respecting national prohibitions), Article 4(2)a (first ensuring waste is reduced to a minimum), 4(2)b (national self-sufficiency for waste management in exporting country), 4(2)d (reducing transboundary movement to a minimum).

4. This practical manual is not legally binding.

We believe it is important to remind the user of the other obligations in the Convention. Too often CA's ignore the general obligations including those that would negate transboundary movement in the first instance.

III. How to use the manual

5. This practical manual can be used by competent authorities of States concerned during the PIC process to assess, as far as practicable, whether the waste subject to a TBM will be managed in an environmentally sound manner.
6. This practical manual should be used as a complement to other guidance documents developed under the Convention. It should not be used in isolation by the competent authorities for consenting to or rejecting a transboundary movement of hazardous wastes or other wastes.
7. The key duties of the competent authorities of the States concerned in a TBM and the notifier (state of export, exporter or generator) with respect to the PIC procedure outlined in Article 6 of the Basel Convention are highlighted below.
8. For a complete description of responsibilities, refer to the Guide to the Control System¹ and the Manual for the Implementation of the Basel Convention.²

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IV. Assessing whether a TBM meets ESM standards during the PIC process

9. During the PIC procedure, cooperation and direct communication in writing or via online messaging systems is necessary between the competent authorities of the States concerned, mainly from the exporting and the importing countries, helps to ensure that hazardous waste and other wastes are managed in an environmentally sound manner.

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A. Competent authorities of the exporting and importing countries

10. The following elements should be considered by the competent authority of an exporting country during the PIC process.

1. Administrative requirements

11. Such administrative requirements include:

- (a) Ensuring that the notification form is complete and that the listed exporter and operator's coordinates are working (e.g. proper phone number, email address etc.).
- (b) The competent authority should take into consideration the guidance provided in the Checklist for Self-Assessment of National Environmentally Sound Management Capacity³ to ensure that the waste will be managed in an environmentally sound manner.
- (c) Ensure that the waste characterization is specific to all constituents of the waste and its hazardous characteristics.
- (d) Ensuring that all competent authorities of all transit countries and the importing country concerning the proposed TBM is notified and consent is received prior to export.
- (e) Checking the existence of a contract between the exporter and the disposal facility specifying environmentally sound management of the waste subject to TBM and reviewing its provisions to ensure that the contract contains all elements as required in national law for such contracts. The Guide to the Control System⁴ contains in its appendix 4 examples of basic elements to be included in such contracts.

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¹ Available at: <http://www.basel.int/Implementation/Publications/GuidanceManuals/tabid/2364/Default.aspx>.

² Ibid.

³ <http://www.basel.int/Implementation/CountryLedInitiative/EnvironmentallySoundManagement/ESMToolkit/Selfassessmentchecklist/tabid/5849/Default.aspx>.

⁴ UNEP/CHW.12/9/Add.3/Rev.1 available at the Basel Convention website: <http://www.basel.int/Implementation/Controllingtransboundarymovements/Guidance/tabid/4313/Default.aspx>.

- (f) ~~Reviewing the contract between the exporter and the disposer specifying environmentally sound management of the waste subject to TBM.~~
- (g) ~~Such an assessment should include whether the disposal facility (including for storage, as applicable) has all necessary valid authorizations, permits or licenses for the intended disposal operation.~~
- (h) ~~Checking if a financial guarantee is put in place and if this is in line with the national legal requirements for such guarantees.~~

2. Environmental Assessment of Operations⁵

12. Such an assessment should include:

- (a) ~~Identifying the disposal operation that will be applied to the waste;~~
- (b) ~~Identifying the potential hazardous characteristics of the waste;~~
- (c) ~~Assessing whether the technology and disposal operation is appropriate and provides for environmentally sound management of the waste considering the disposal technology used.~~
- (d) ~~Assessing whether the pollution controls are adequate to protect the community and environment outside the facility.~~
- (e) ~~Ensuring that any recycling facility actually recycles most of the imported waste and not an inappropriately small percentage of it.~~
- (f) ~~Identifying where and how the residues from the disposal operation will be treated. Residues arising from the treatment of hazardous wastes can also be hazardous. Consequently, environmentally sound management of these downstream facilities should be ensured;~~
- (g) ~~When feasible, the assessment should also include whether the disposal facility has the capacity to complete the proposed disposal of the waste, noting there may be multiple operations required and corresponding facilities. ESM should apply to all~~
- (h) ~~Determine if the storage of the waste is adequate and environmentally sound.~~
- (i) ~~The disposal facility has policies and activities in place to prevent, treat and mitigate potential releases from the proposed disposal operation;~~
- (j) ~~The facility has procedures or other measures in place to respond to emergencies during waste handling.~~
- (k) ~~Determine if the standards of the disposal facility in the importing country are acceptable standards to the exporting country.~~

3. Occupational Health and Safety Requirements

13. Such an assessment should include:

- (a) ~~An assessment of the controls to prevent and mitigate indoor air quality and other workplace exposure pathways.~~
- (b) ~~A review of labor protection procedures, planning, guidelines, of technologies and programs for the promoting health and safety of employees.~~
- (c) ~~A work related accidents and illnesses report for the last two years, as well as a record of compliance and any non-compliance with occupational health and safety laws.~~
- (d) ~~Availability of nearby affordable occupational clinics and testing.~~
- (e) ~~Existence of any air quality monitoring, and or blood and hair sampling of workers.~~

⁵ When referring to a disposal operation or disposal facility within the manual, all disposal operations and facilities involved in the TBM are to be considered.

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Perhaps the most important consideration has to do with the health and safety of the work force as they are exposed to the most acute hazards likely to be present. Therefore we need a separate more elaborated section here.

Additional considerations to ensure the environmentally sound management of the wastes

14. It is important to assess if the import or export is in line with the exporting and importing states' national waste management planning and policy principles as well as with the general obligations of the Basel Convention. For example, consistent with the overarching obligation to minimize transboundary movement, is the export necessary? The competent authority of an importing state should check if by allowing the import, the country still has sufficient waste treatment capacity to manage wastes generated inside its own country or if import would lead to a situation that there would be insufficient capacity to treat wastes generated in the country in an environmentally sound manner; the competent authority of an exporting state should assess as to whether there are steps that can be taken to process the waste nationally.

15. The scope of environmentally sound management is not confined to the receiving facility itself. The general and waste management infrastructure and legal framework of a country to ensure facility operators fulfill ESM, must be assessed as well. This will include national societal safety nets, such as rights of workers to be protected from the impacts of hazardous wastes, rights to redress harm, occupational health clinics, etc. All such considerations are important aspects of ESM.

16. Therefore, the importing country and region should be assessed as to whether it has:

- (a) effective and enforced pollution control legislation in place in relation to the disposal facility that address air emissions, effluent and soil contamination;
- (b) effective and enforced occupational health and safety legislation in place in relation to the disposal facility that address indoor pollution exposure, accident abatement, dermal exposure etc.
- (c) adequate roads, transport and other fire, ambulance and other systems in place for emergency response programs to function effectively.
- (d) effective legal labor rights, tort law, collective bargaining, trade unions, to ensure a worker's ability to redress occupational harm.

17. If it is unclear or doubtful whether a country, apart from the facility owners and operators, can ensure that the facility can provide ESM of the wastes in question, the competent authority of the exporting country or importing country may impose additional measures or deny consent prior to export.

18. Control and enforcement personnel can apply additional/special controls that can be made in the importing or exporting country, e.g., at the border. For example, to verify that the wastes intended for export / import correspond to the description on the notification.

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<#>The disposal facility has policies and activities in place to prevent, treat and mitigate potential releases from the proposed disposal operation;
<#>The facility has procedures or other measures in place to respond to emergencies during waste handling.

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(a) Additional requirements established by the competent authority

12. The competent authority of the exporting or importing country could provide the notifier with a detailed explanation of what additional information is required. (For example, the consent of an initial proposed “test” export may be subject to a detailed report of the results of the disposal of the concerned waste in the disposal facility. Subsequent proposed exports may be subject to the results of this report. Alternatively, the exporter may be interviewed about the importer or the disposal facility for first time notification.

(b) Independent audit of the disposal facility

13. The competent authority of the exporting or importing country may require an independent audit of the disposal facility and the relevant aspects of the legal and physical infrastructure surrounding the facility, when receiving an initial notification. An audit could support the competent authority of the exporting country in assessing the proposed TBM. The competent authority of the exporting country may use this information to assess subsequent notifications for exports to the same disposal facility based upon the results of this audit.

(c) Additional/special controls

14. Control and enforcement personnel could be made aware of additional/special controls that can be made in the exporting country, e.g., at the border. For example, verification that the wastes intended for export correspond to the description on the notification.

(d) Potential resources for information about the disposal facility in the importing country

15. Such resources include:

- (a) Tools on the Basel Convention website including the Technical Guidelines for ESM for various waste streams;
- (b) Competent authorities and focal points to the Convention including:
 - (i) Data on disposal facilities in importing countries available to by competent authorities of the importing country;
 - (ii) Previous assessments performed by competent authorities of the exporting country of the facilities, technologies and regulations in the importing country;
- (c) Websites of disposal facilities;
- (d) Existing Certifications and record of suspensions and critical non-Conformities.
- (e) National authorities, and their lists of permits and licenses granted, including enforcement actions taken.
- (f) Prior TBMs of hazardous waste or other wastes to the importing country and to the disposal facility, and the experience from stakeholders in those cases;
- (g) Anecdotal information about the performance of the disposal facility with respect to environmentally sound management of wastes, if available.
- (h) Independent audit results of the facility.

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The above changes reflect a reorganization to reflect logical categories and making it clear that the requirements of the importing state and exporting state are virtually the same. Administrative, Environmental, Occupational, and Other considerations is a proper ordering of categories and importing states and exporting states are combined here as they should be looking at the same things.

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B. Competent authority of a transit country

16. If the competent authority of a transit country receives a notification for a TBM of hazardous wastes or other wastes, the competent authority should take the necessary steps to ensure that the planned transit through its territory will exclude possible damage to the environment and human health in the transit country prior to consent. During transit, random and targeted checks of shipments may be useful.

17. Further, if the competent authority of a transit country has reason to believe that the wastes in question will not be managed in an environmentally sound manner then they should not allow such movement through their territory and should also so inform the exporting state.

18. The following elements could be considered by the competent authority of the transit country during the PIC process.

1. Administrative requirements

19. Such administrative requirements include:

- (a) Ensuring that the notification form (Article V A) is complete, including that all waste streams, operational destinations, and means of transport are indicated;
- (b) Sending acknowledgement of receipt of the notification to the notifier to establish the date from when the 60-day period commences.
- (c) All other requirements as indicated in Article 6 of the Convention are adhered to.

2. Supplemental technical information that should be considered in assessing the transportation

20. In order to ensure that a transit of hazardous waste or other wastes is environmentally sound, the competent authority of the transit country should also consider whether:

- (a) The means of transport and the type of packaging are adequate for transporting the waste in question in an environmentally sound manner. The waste classification and description, the description of the hazardous components contained in the waste and the hazardous characteristics of the waste can be used to make an informed decision;
- (b) Restrictions on the notified transportation route apply (e.g. tunnels where explosive or flammable wastes are not allowed to be transported, or sea routes where certain materials are not allowed to be transported), e.g. through canals, and sensitive areas;
- (c) Insurance requirements for the transport are met;
- (d) Control and enforcement personnel should be made aware of additional/special controls that can be made. For example, verification that the wastes concerned correspond to the description on the notification.

3. Potential resources for information for the transit country

21. Such resources include:

- (a) Technical Guidelines on the Basel Convention website regarding hazardous characteristics and waste streams;
- (b) UN Recommendations on the Transport of Dangerous Goods, Committee of Experts on the Transport of Dangerous Goods of the United Nations Economic and Social Council (ECOSOC);
- (c) Competent authorities and focal points to the Convention of the other States concerned;
- (d) Other authorities involved in transportation and the transport of dangerous goods.

Transit states have less homework to do and need to focus more on transport issues through their territory but they also must act if they have concerns about ESM in the recipient facility.

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If the competent authority of an importing country receives a notification for a TBM of hazardous waste or other wastes, the competent authority should take the necessary steps to ensure that the waste subject to the planned TBM will be managed in an environmentally sound manner. The competent authority could take into consideration the guidance provided in the Checklist for Self-Assessment of National Environmentally Sound Management Capacity⁶ to ensure that the waste will be managed in an environmentally sound manner.

1. Administrative requirements

Such administrative requirements include:

Ensuring that the notification form is complete;

Checking the existence of a contract between the exporter and the disposal facility specifying environmentally sound management of the waste subject to TBM and reviewing its provisions if needed. The review should ensure that the contract contains all elements as required in national law for such contracts. The Guide to the Control System⁷ contains in its appendix 4 examples of basic elements to be included in such contracts;

Checking if a financial guarantee is put in place and if this is in line with the national legal requirements for such guarantees.

2. Supplemental information

Such supplemental information could include:

- (a) Assessing if the import is in line with national waste management planning and with waste management policy principles. The competent authority should check if by allowing the import, the country still has sufficient waste treatment capacity to manage. [12]

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