

# Applying for an accreditation to reprocess or export UK waste packaging



The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 'the Regulations' (as amended)

For Northern Ireland the regulations are The Producer Responsibility Obligations (Packaging Waste) Regulations (Northern Ireland) 2007 (as amended)



Northern Ireland Environment Agency  
www.ni-environment.gov.uk



An Agency within the Department of the Environment  
www.doeni.gov.uk

## Please read these guidance notes carefully before making your application online using the National Packaging Waste Database.

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## 1 About the accreditation system

In 1997, we and the Scottish Environment Protection Agency developed a voluntary accreditation system which allowed businesses approved by us to issue evidence that they recover and recycle waste packaging produced in the UK.

We issued guidance on that system in July 1997 ('Guidance on evidence of compliance and voluntary accreditation of reprocessors'). These guidance notes replace the parts of that document which refer to the accreditation process, so you should use this guidance when applying to us.

You can apply for an accreditation if you are a UK business which:

- recovers or recycles UK waste packaging; or
- exports UK waste packaging for recovery or recycling.

By 'recovering' waste, we mean burning it as a fuel or using it to create energy in some other way. By 'recycling' waste, we mean creating new products from materials which have been thrown away. The new products can have the same or a different purpose as the original materials.

These guidance notes tell you what conditions you need to meet to get an accreditation and explain how to apply. You can find full details in the annexes.

- Annex A (page 5): Accreditation conditions
- Annex B (page 7): Procedures for issuing ePRNs and ePERNs for specific waste materials (see note below)
- Annex C (page 8): Acceptable efficiency standards for reprocessors
- Annex D (page 9): Recovery and recycling activities we accept

## What the accreditation system is for

The accreditation system aims to:

- make sure businesses are consistent when gathering and supplying evidence of recovering and recycling UK waste packaging; and
- help us monitor the recovering and recycling that accredited businesses have done.

If your business is granted accreditation, you may receive payments from registered producers (or schemes acting on their behalf) for issuing:

- electronic waste packaging recovery notes (ePRNs); or
  - electronic waste packaging export recovery notes (ePERNs).
- There is more information about the way you should invest this money in 'Business plan' (page 3).

**From 1 February 2007, paper copies of PRNs and PERNs have been replaced by electronic ones (ePRNs and ePERNs). Electronic PRNs and PERNs are now the only acceptable evidence that registered producers can offer. For more details about this change, please read the guidance note NPWD02 from our website.**

## 2 Applying for accreditation

### a If your main place of business is in England or Wales you should apply to us.

If your main place of business is in Scotland, you should apply to the Scottish Environment Protection Agency.

If your main place of business is in Northern Ireland, you should apply to the Northern Ireland Environment Agency (NIEA).

We do not accredit people or businesses based outside the UK. Applications for accreditation can now be processed online using the National Packaging Waste Database (NPWD). Please refer to Guidance note – How to apply for accreditations as a reprocessor or exporter of packaging waste using the National Packaging Waste Database NPWD06 for more details ([www.environment-agency.gov.uk/commondata/acrobat/npwd06\\_1849550.pdf](http://www.environment-agency.gov.uk/commondata/acrobat/npwd06_1849550.pdf)).

To apply, you need to do the following.

- Upload a business plan. (There is more about this on page 3.)
- Upload a sampling and inspection plan. (There is more about this on page 3.)
- If you are filling in the export form, upload evidence that the site you are exporting the waste to meets the same environmental standards as similar sites in the UK. This is known as 'broadly equivalent' and you can find out more about this on page 2.
- Pay the application fee. (There is more information about fees on page 4.)
- Submit your application online.

Accreditations last for one year only. You must send us the filled-in form by 30 September if you want your accreditation to start from 1 January of the following year. We normally process applications we receive after 30 September within 12 weeks of receiving them. This may mean that your accreditation will not be in place for the full 12 months from 1 January to 31 December.

### Applying for more than one accreditation

For reprocessing waste, we accredit each site separately.

If you are applying for more than one accreditation, you must keep all relevant documents separate. If you transfer any waste packaging between accredited sites (for example, sending packaging waste from one site to another), you must clearly record this.

You must make sure you do not issue ePRNs twice for the same waste packaging. For example, if you issue an ePRN for the waste you receive and you then pass the waste on to another company, you must make sure they do not issue ePRNs for the same waste.

### b Summary of accreditation conditions

- When you apply, we must be satisfied with all the information you have provided, including a suitable business plan and a sampling and inspection plan (see page 3).
- You must keep to the conditions of schedule 5 of the regulations – for more information, see ‘Annex A: Accreditation conditions’ on page 5.
- You must keep to any conditions we specify when we grant accreditation – for more information see ‘Agency conditions’ on page 5.
- You must set up a system for managing documents which accurately records the activities you do that are connected to reprocessing or exporting (or both) UK packaging waste.

For more details about the accreditation conditions, read Annex A on page 5.

### c Accreditation for reprocessing waste packaging

When applying for an accreditation to reprocess waste, you will need to provide suitable evidence to confirm that you have reprocessed UK waste packaging. We will normally agree with you what evidence is needed, but you must always prove:

- where the UK waste packaging comes from;
- the weight of the UK waste packaging you receive and reprocess;
- you have kept to the relevant laws;
- how efficient your reprocessing plant is, and that it meets the appropriate standard (for more information, see ‘Annex C: Acceptable efficiency standards for reprocessors’ on page 8); and
- what the material you reprocess is to be used for.

### d Accreditation for exporting UK waste packaging

To apply for accreditation for exporting waste, you will normally need to provide evidence to confirm you have exported UK waste packaging to specific overseas sites for reprocessing. **See Annex E for the new rules on broadly equivalent evidence.** We will agree with you what evidence is needed, but you must always prove:

- where the UK waste packaging comes from;
- the weight of the UK waste packaging you export (by load, container and so on); and
- where in the UK you will export the waste from.

You may also have to prove:

- the order from overseas for the waste packaging;
- whether the waste shipment has cleared customs in the country you have sent it to;
- the overseas reprocessor has accepted the waste;
- the waste has been received for reprocessing by the overseas reprocessor you have named in your application.

To be accredited to export UK waste packaging, you must do the following:

- you must own the waste at the time you export it (or the overseas reprocessor must own it)
- you must either:
  - 1 export the UK waste packaging to a reprocessing site you have named on a part C, which:
    - reprocesses waste packaging for a purpose we approve (for more information, see ‘Annex D: Recovery and recycling processes we accept’) and
    - has reached an appropriate reprocessing standard agreed with us (for more information see ‘Annex C: Acceptable efficiency standards for reprocessors’)

or

- 2 export the UK waste packaging to a country you have stated on a part C and in accordance with the conditions of export (for more information see ‘Annex E: Guidance for accredited exporters on demonstration of ‘broadly equivalent’ standards overseas’)
- you must keep to the conditions of the Transfrontier Shipment of Waste Regulations 2007 (TFS). These regulations are about supervising and controlling shipments of waste in and out of the European Community – for more information, see below.
  - you must have evidence that any overseas reprocessor you have named in your application meets broadly equivalent environmental standards as reprocessors in the UK.

### Transfrontier Shipment of Waste Regulations (TFS)

Different conditions in the TFS apply to different types of waste you export. The country you export the waste to may also place restrictions on the types of waste it will accept. To get accreditation, you must show you are keeping to these regulations on each shipment. You can get copies of these regulations, ISBN 01107738534, by phoning The Stationery Office (TSO) on 0870 600 5522. If you have specific questions about the regulations, phone our TFS National Service on 01925 542265.

### What ‘broadly equivalent’ means

If you export waste packaging, it should be treated and recovered at sites where the processes meet environmental standards that are ‘broadly equivalent’ to the standards that apply in the European Union. This means that the country the site is in must have standards in place to make sure waste is recovered or disposed of without:

- putting people’s health in danger; or
- using processes or methods which could harm the environment, in particular without:
  - harming water, air, soil and plants and animals;
  - causing a nuisance through noise or smells; or
  - having a negative effect on the countryside or places of special interest. Places may be of ‘special interest’ if they have special cultural, architectural, historical, scientific or other interests.

The standards should also make it illegal for the overseas reprocessor to dump waste or get rid of it in ways that are not controlled. It is essential that the country has a way of assessing whether the site has kept to the standards set out above and that the standards can be enforced against the operator of the site.

### e Business plan

You need to provide a business plan with your application. The plan should contain information about how you will use the funds you get from issuing ePRNs and ePERNs, and must cover:

- how you will collect and reprocess more UK waste packaging (for example, improving the amount of waste your equipment can reprocess, buying new equipment, or providing funds to support other organisations which collect waste).
- how you will develop new markets which will use the recycled waste packaging (for example, increasing the number of businesses you can sell the waste to, supporting environmental organisations (ideally those approved under landfill tax laws) specifically designed to develop an existing market, developing new markets, and funding research into new uses for recycled packaging materials);
- your arrangements for collecting and sorting waste packaging; and
- your strategy, including your communications strategy, (that is, how you plan to tell your suppliers and customers your plans) for achieving all of the above.

### Renewing your accreditation

If you want to renew your accreditation, you should revise your business plan to reflect your strategy for the new accreditation period.

You must take reasonable steps to put your business plan in place. We will expect to see some evidence of how you have put in place business plans you have sent to us before. You should justify any major changes from your previous business plan about how you use money you get from issuing ePRNs and ePERNs, or we may refuse to accredit your business.

If you are applying for more than one site, you can send a single business plan as long as it gives details about the following for each site:

- your arrangements for collecting and sorting waste;
- how you will develop your business to deal with more waste; and
- what type of materials you reprocess or export.

### f Sampling and inspection plan

You should include a sampling and inspection plan with your application. This plan aims to make sure that any waste you receive or export for which ePRNs or ePERNs are issued is waste packaging from the UK. The plan must include details of:

- your checks with suppliers to make sure the packaging waste you receive or export comes from the UK;
- the samples you take from time to time of loads to check how much waste packaging you are receiving or exporting;
- how you inspect documents, for example, weighbridge tickets (these are issued by a public site that weighs vehicles' contents, or by your site's own weighing facility), receipts, invoices and so on; and
- your system for inspecting the waste you receive.

We have developed a number of procedures you can use to work out how much of each waste is contained in different

loads you receive. For more information, see 'Annex B: Procedures for issuing ePRNs and ePERNs for specific waste materials'.

### Mixed-waste packaging

Sites that we accredit to reprocess specific types of waste packaging are encouraged to only accept that type of material.

For example, if we have accredited your site to reprocess plastic waste packaging, you should (if possible) make sure that loads of plastic packaging waste are not mixed with other types of waste.

If you cannot avoid receiving mixed loads, we may agree to this if you have a procedure in place for taking samples of the content of mixed-waste loads, and waste packaging makes up a set percentage of those loads.

Operators of sites accepting and processing mixed loads of waste (i.e. containing packaging and non-packaging waste) may be accredited on the basis of an agreed standard packaging content of the mixed loads. A standard factor may be agreed for all incoming mixed loads or the operator may establish separate factors for mixed loads from each of his suppliers. This should be done by the reprocessor through the initiation of a sampling regime.

Records of the nature and origin of incoming waste must support all such arrangements and a sampling regime (over agreed timescales and under agreed conditions) must be approved by the appropriate Agency. It is the responsibility of the reprocessor to undertake and fully document the sampling procedures. The relevant Agency may require further periodic sampling to confirm the validity of the adopted conversion factor(s).

All quoted averages based upon sampling of packaging waste content at reprocessors shall have a 95% level of confidence that figures will fall within 10% absolute of the true average over a specified timescale. For example, the true average for a figure quoted as 30% should fall within the actual range 27% to 33% with 95% confidence.

Agreements will usually be in respect of individual reprocessors. Exceptionally an agreement could be made with a range of reprocessors to cover all their operations based upon an acceptable sample of all their activities.

In the absence of a specific agreement for a time-based sampling regime as outlined above, a reprocessor must institute a sampling scheme in respect of each batch of mixed waste received.

Mixed-waste loads delivered to UK reprocessing facilities can be:

- mixed with non-packaging waste of the same material (for example, plastic waste packaging mixed with other waste plastic);
- mixed with waste packaging of another material (for example, plastic waste packaging mixed with paper waste packaging); and
- waste from the UK mixed with imported waste packaging.

If you want to issue ePRNs or ePERNs for mixed-waste loads, you are responsible for developing an appropriate procedure for accepting mixed-waste loads, and sending it to us. You should base this on a strong and well-documented sampling procedure. It should include:

- a description of the waste packaging loads your site receives;
- the reason you need a procedure for accepting mixed-waste loads;

- how you developed the procedure for accepting mixed-waste loads;
- for mixed waste you receive (packaging and non-packaging), the percentage of the mixed waste you will be issuing ePRNs for; and
- when you plan to review your procedure.

### **g Independent audit report**

If we accredit you to issue ePRNs or ePERNs for more than 400 tonnes of waste packaging, you must give us an independent auditor's report by 28 February after each year you are accredited.\* The report must show that the ePRNs or ePERNs you issued in the previous year are consistent with the weight of packaging waste you received or exported in that year. This report should include the carry-forward period for ePRNs or ePERNs issued in that year. The 'carry-forward' period is the January after the December covered by your accreditation. During this period you can issue ePRNs and ePERNs for waste packaging you received in December.

More specific guidance detailing the information required in an Independent audit report can be found in GN03: Independent audit report guidance ([www.environment-agency.gov.uk/commondata/acrobat/audit\\_1963322.pdf](http://www.environment-agency.gov.uk/commondata/acrobat/audit_1963322.pdf)).

If you fail to supply an independent audit report by the date it is due, we will normally suspend any current accreditation. We can also ask you to amend your report, or produce a new report, if it does not meet the conditions in the regulations.

\* Under the NI regulations this is only required when more than 5000 tonnes of ePRNs/ePERNs have been issued.

### **3 Fees**

From 2008 onwards, you must pay a yearly application fee to us, SEPA (for Scotland) or NIEA (for Northern Ireland) depending on where your business is based. Fees are based on the amount of ePRNs and ePERNs you plan to issue for waste packaging you reprocess or export during the year for which you are applying for an accreditation.

- If you reprocess or export 400 tonnes, the fee is £505.
- If you reprocess or export over 400 tonnes, the fee is £2,616.

You need to pay the fee when you apply.

If you pay the lower fee but you then issue ePRNs or ePERNs for more than 400 tonnes, you will have to pay the balance of the £2,616 fee (that is, £2,111). You must pay this within 28 days of issuing the ePRN or ePERN for the 401st tonne of waste packaging.

### **4 Deciding on your application**

Accreditation lasts for up to a year. It normally takes 12 weeks to decide on an application. So, you need to apply by 30 September to be accredited from 1 January. We will normally process applications we receive after 30 September within 12 weeks, and the accreditation will run from the date we make our final decision on your application. If this date is after 1 January of the year you want the accreditation for, this means the accreditation will apply for less than 12 months. We will not backdate your accreditation and all accreditations will end on 31 December.

Once we receive your application, we will pass it to the nearest office we have to your site. One of our environment officers will then contact you to arrange a site inspection. They will discuss any issues relevant to your application when they inspect your site.

We will send you a notice to confirm the outcome of the application, which will be either granting or refusing an accreditation.

Once you have been accredited, you can use NPWD to go online to:

- record the waste packaging you have received for reprocessing or exporting;
- fill in your three-monthly returns for packaging waste you have received and reprocessed; and
- issue ePERNs.

Please refer to guidance note NPWD03 ([www.environment-agency.gov.uk/commondata/acrobat/npwd03\\_1974234.pdf](http://www.environment-agency.gov.uk/commondata/acrobat/npwd03_1974234.pdf)).

If you have any difficulties with the NPWD, phone our support line on 08708 506506.

### **Refusing accreditation**

We can refuse to accredit your business for a number of reasons – for example, if you have not given us all the information we need or you have not included the appropriate fee. We can now also take into account any relevant convictions, or if you have not kept to the Transfrontier Shipment of Waste Regulations (TFS). If we refuse your application and you do not agree with our decision, you can appeal. For more information, read 'Your right to appeal' on page 4.

If we refuse your application, we will not refund your application fee.

### **5 Suspending and cancelling accreditation**

We may suspend or cancel your accreditation if we think you have:

- failed to meet any of the accreditation conditions in schedule 5 of the Packaging Regulations, or specific conditions we, SEPA or NIEA set for your site (for more information, see Annex A on page 5);
- given false information in your application;
- given false information to meet any of the conditions of your accreditation; or
- issued ePRNs or ePERNs incorrectly.

In these circumstances, we may have to make the ePRN or ePERNs you have issued invalid, in which case you may be breaking your contract with your customer. We may also take action against you to enforce the regulations.

We will also cancel your accreditation if you:

- no longer hold a relevant authorisation from us, SEPA or NIEA allowing you to legally handle waste at your site;
- stop reprocessing or exporting waste; or
- ask us to cancel it (from the date you tell us).

### **Giving you notice that we are suspending or cancelling your accreditation**

Before suspending or cancelling your accreditation, we will give you a notice in writing explaining:

- our decision to cancel or suspend the accreditation;
- the reasons for our decision;
- your right to appeal; and
- the date the suspension or cancellation will start.

If we tell you that we plan to suspend your accreditation, we will tell you how long the suspension will last, or explain what you need to do to avoid or end the suspension.

While the suspension applies, you must not issue any evidence (ePRNs or ePERNs). Once we end the suspension,

you must not issue any evidence against waste packaging you received or exported while the suspension applied.

## Your right to appeal

You may appeal to the Secretary of State\* if you disagree with our decision to:

- refuse your application for accreditation;
- attach conditions to your accreditation under schedule 5(q) (iii) of the packaging regulations;
- cancel your accreditation; or
- suspend your accreditation.

\* Appeals in NI go to the Planning Appeals Commission (PAC).

## 6 Enforcing the conditions of your accreditation

Under the regulations, specific offences have been introduced for accredited reprocessors and exporters who fail to meet certain conditions of their accreditation. If you break the conditions of your accreditation, we will investigate and may take action to enforce the conditions. We can do this by:

- sending you a warning letter;
- giving you a formal caution; or
- prosecuting you.

If we take action against you to enforce the conditions of your accreditation, we can still suspend or cancel your accreditation as well if we think this is appropriate.

## 7 Sharing your information

By law, we must place on the public register:

- the name and address of your registered office; or
- your main place of business for each accredited site.

To provide an efficient system and to help producers and schemes get ePRNs and ePERNs, we may also make the following information about your business available to the public:

- the type of material you reprocess or export;
- your reprocessing 'R' code for the type of reprocessing activity you are carrying out;
- your fee band (which depends on whether you reprocess or export less or more than 400 tonnes);
- the name of the person you have given as a contact on your application form;
- your business phone number;
- the address of your site;
- your agency reference number, which you are given when you register;
- any three-monthly returns and yearly returns we have not received from you;
- whether we have sent you a notice to suspend or cancel your accreditation; and
- whether we have suspended or cancelled your accreditation.

From time to time, we will also publish the following information for all accredited reprocessors and exporters as a whole. This information will not identify individual businesses:

- the total amount of UK waste packaging received by all the businesses we accredit;
- the total amount of UK waste packaging reprocessed and exported by all the businesses we accredit;
- the total number of ePRNs and ePERNs issued and sold;

- the total money raised from issuing and selling ePRNs and ePERNs, and what this money has been spent on; and
- how much of each type of waste all the reprocessing sites we accredit are able to deal with.

If you think we should keep any information you provide about your business confidential, please let us know. However, under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004\*, we may have to reveal your information even if you have asked us to keep it confidential.

## 8 Further help and guidance

### For England and Wales

Information on the packaging regulations is available here: [www.environment-agency.gov.uk/packaging](http://www.environment-agency.gov.uk/packaging)

For queries about accreditation as an exporter of packaging waste:

e-mail: [packaging.waste@environment-agency.gov.uk](mailto:packaging.waste@environment-agency.gov.uk)

telephone: 08708 506 506

Information on the controls that apply to the transfrontier movements of waste are available here:

[www.environment-agency.gov.uk/wasteshipments](http://www.environment-agency.gov.uk/wasteshipments)

e-mail: [nattfs@environment-agency.gov.uk](mailto:nattfs@environment-agency.gov.uk)

telephone: 08708 506 506

### For Scotland

Information on the packaging regulations is available here: [www.sepa.org.uk/producer/](http://www.sepa.org.uk/producer/)

For queries about accreditation as an exporter of packaging waste:

e-mail: [Producer.responsibility@sepa.org.uk](mailto:Producer.responsibility@sepa.org.uk)

telephone: 01786 457700

Information on the controls that apply to the transfrontier movements of waste is available here:

<http://www.sepa.org.uk/regulation/waste/trans/>

telephone: 01786 457700

### For Northern Ireland

Information on accreditation of exporters of packaging waste and the controls that apply to the transfrontier movements of waste are available here:

<http://www.ni-environment.gov.uk/waste/regulation-and-legislation.htm>

For queries on accreditation as an exporter of packaging waste:

e-mail: [packaging@doeni.gov.uk](mailto:packaging@doeni.gov.uk) or telephone 028 9056 9338

For queries on transfrontier shipments of waste:

e-mail: [tfs@doeni.gov.uk](mailto:tfs@doeni.gov.uk) or telephone 028 9056 9742

\* For Scotland the regulations are 'Freedom of Information (Scotland) Act 2002 and The Environmental Information (Scotland) Regulations 2004'.

## Annex A: Accreditation conditions

### Schedule 5 of the Packaging Waste Regulations

If we accredit you, you must meet the conditions set out in schedule 5 of the regulations. We have set out below how we will ask you to do this.

#### 1 The National Packaging Waste Database (NPWD), ePRNs and ePERNs

We have introduced a new online system for:

- recording the waste you receive for reprocessing or export;
- authorising and issuing electronic evidence (ePRNs and ePERNs); and
- recording your sets of three-monthly returns.

This is to:

- help prevent fraud; and
- allow us to analyse information to a higher standard than we were able to before.

The database will not be used for trading and will only track and record evidence that has been issued. The system will not record any business transactions and contracts that exist between reprocessors or exporters issuing evidence and the companies which buy the evidence.

If you do not want to use the NPWD, you can still send us three-monthly reports (quarterly reports) and yearly information in a hard copy. However, we will have to enter this information into the system manually. Because ePRNs and ePERNs will have to be issued electronically, if you do not use the NPWD system yourself, you will have to ask us to do this on your behalf.

You can find more information about the new system in guidance note NPWD02. If you have any problems, you can email the NPWD helpline ([packaging.waste@environment-agency.gov.uk](mailto:packaging.waste@environment-agency.gov.uk)) or phone 08708 506506.

#### Issuing ePRNs and ePERNs

**For accredited reprocessors:** You can only issue ePRNs for the UK waste packaging (in tonnes) you received in the calendar year for which your business is accredited, and from the date the accreditation begins. Once you have received the waste, you can issue an ePRN for the weight you have received, but only if the material goes on to be reprocessed and meet specified process efficiencies.

**For accredited exporters:** You can only issue ePERNs for the UK waste packaging (in tonnes) that you own and export in the calendar year for which your business is accredited, and from the date the accreditation begins. Once the waste has been exported from the UK, you can issue an ePERN for the weight of packaging material you have exported. Exporters can issue PERNs when the waste leaves the UK (e.g. date ship sails), NOT when containers are sealed.

Whether you have a reprocessing business or an export business, once your business is accredited you can issue ePRNs or ePERNs for the weight of packaging waste you receive or export in the calendar year. These can be issued from the date your accreditation begins until 31 January the year after. After 31 January, you cannot issue ePRNs or ePERNs for UK waste packaging you received or exported during the previous year. They can only be issued by a UK accredited reprocessor or exporter of packaging waste. Producers cannot share ePRNs/ePERNs.

Reprocessors and exporters no longer need to issue surplus eP(E)RNs to the Agency, NPWD calculates the eP(E)RN surplus and details of surplus eP(E)RNs are included in the quarter four report on recovery and recycling of packaging waste in the UK.

This report can be viewed in the public reports on NPWD.

If you have accreditations for a number of sites, you may find it useful to issue ePRNs or ePERNs (or both) from a central point. Please ask us for our approval first. Remember, even if you issue ePRNs or ePERNs from a central point, you must still keep separate records, returns, ePRN and ePERN accounts within NPWD for each accredited site.

#### What packaging waste can an exporter/reprocessor issue eP(E)RNs against?

1. Where a product is not conceived as packaging (i.e. may be process waste that has not been formed into packaging), such items cannot be considered as packaging waste and therefore cannot have eP(E)RNs issued against them when reprocessed.
2. Non-obligated packaging – Where packaging has been conceived, but has not been declared under a producer's obligation, e.g. they are under 50 tonnes, the packaging item can still be considered as UK packaging waste for the purposes of reprocessing – i.e. a eP(E)RN can be issued against it. This includes packaging waste from mines and quarries.

#### Filling in ePRNs or ePERNs

- You must fill in all sections of ePRNs and ePERNs. So, you should make sure you have all the information you need before you agree to issue the evidence.
- If you issue ePERNs for UK waste packaging you have exported, but that waste is not reprocessed, the ePERNs are not valid. However, if you can show that you exported other loads which were reprocessed, but had no ePERNs issued on them, you can use these loads to offset any previous loads which were not reprocessed. You will need to balance any tonnes of waste packaging not reprocessed in your records.
- You can only fill in the ePRN or ePERN if you have an accreditation.
- You should not make changes to the ePRN or ePERN after you have issued it. If you need to make any amendments, you should cancel the first ePRN or ePERN, and then issue a new ePRN or ePERN to replace it.
- If you export waste packaging, you need to show that the overseas reprocessors meet our appropriate standards (see 'Annex C: Acceptable efficiency standards for reprocessors') and that the material has been reprocessed in line with the correct procedures (see 'Annex B: Procedures for issuing ePRNs and ePERNs for specific waste materials'). If the waste is not reprocessed for any reason (for example, because the waste has been mixed up with other materials) you must balance the ePERNs you have issued against the packaging waste actually reprocessed (whether it is your fault or not that the waste is not reprocessed).
- You should not issue any ePRN or ePERN with a date on that is earlier than any ePRN or ePERN you have already issued.

#### 'Carry over'

- You can use an ePRN or ePERN that relates to packaging waste delivered or exported for reprocessing in any December, to show you have met your recovery and recycling responsibilities either in that year or the year after.
- Only people authorised to do so under our accreditation can issue carry-over ePRNs or ePERNs. However:

- to issue carry-over ePRNs, the person must be accredited at the time the material is received, and the ePRN issued must relate to waste packaging they received to reprocess on the accredited site; and
- to issue carry-over ePERNs, the person must be accredited at the time the material was received, and the ePERN must relate to waste packaging they exported to be reprocessed at a site or sites named in the accreditation.

### A note about PRN books and PERN books

Since 1 February 2007, you can no longer use printed PRN books or PERN books to issue evidence under these regulations, as they have been replaced by electronic evidence through the NWPD. You should return to us any PRN or PERN books you still hold, including the original PRNs and PERNs and the counterfoils.

### Whole tonnes

The tonnes shown on an ePRN or ePERN must be a whole number because the NWPD system only accepts whole numbers. At the end of the year, you should round any packaging waste tonnages to the nearest tonne. For example, 5.4 tonnes would be rounded down to 5 tonnes but 5.5 would be rounded up to 6 tonnes.

### Replacement ePRNs and ePERNs

The previous system of issuing replacement evidence has changed. If you need to change an ePRN or ePERN you have already issued, you need to cancel the original entry for that evidence in the NWPD so that it is no longer valid. You can then issue new evidence into the NWPD (up to the amount of waste packaging shown on the evidence you are replacing).

You should issue ePRNs or ePERNs to replace the original evidence when you are asked to do so by a producer, scheme or their representative that holds the original. After 31 January for each year, you cannot issue replacement ePRNs or ePERNs for waste you received for reprocessing the year before.

## 2 Management and records

You can only issue ePRNs or ePERNs to:

- producers;
- organisations running schemes; or
- their representatives. If you are issuing an ePRN or ePERN to a representative, you should fill in the ePRN or ePERN with the name of the producer or scheme, not the representative.

You should keep records as shown on the reporting form we provide. You should update your records every three months and keep each record for at least four years. We may audit these records when we monitor and assess applications.

You need to give us reports every three months with the following information:

- the weight (in tonnes) of waste packaging you received or exported for reprocessing in those three months;
- the weight (in tonnes) of waste packaging you reprocessed in those three months; and
- the number of ePRNs and ePERNs you issued in those three months.

The reports must reach us by the following dates:

- the report for January, February and March must reach us by 21 April;
- the report for April, May and June must reach us by 21 July;

- the report for July, August and September must reach us by 21 October; and
- the report for October, November and December must reach us by 28 February.

You must also send us a yearly report, for the previous year, by 28 February. The report must include:

- all the information you provided in your three-monthly (quarterly) reports for the previous year;
- the amount of money you received in the previous year from issuing ePRNs or ePERNs; and
- a statement of what you spent the money on.

**Note:** The NWPD system will allow you to fill in and send these reports online. However, because the reports have to be signed by law, you should also print them out after completing them and then sign them and send them to us by post.

### Our conditions

We can set other conditions you must meet to get accreditation. This section sets out guidance on conditions that we and other agencies will specify for all reprocessors and exporters. If we need to set conditions that relate to your business only, we will normally discuss these with you before we grant accreditation. We will include all our conditions in your notice of accreditation.

## Annex B: Procedures for issuing ePRNs and ePERNs for specific waste materials

### Mixed waste paper (OCC)

If you receive mixed waste paper, old kraft or lined straw containers (KLS) or cardboard we will accept the following.

#### Mixed waste paper

- If you have sampling methods, we will accept a percentage you set for how much paper packaging there is in that waste, as long as you use sampling methods that we have agreed.
- If you do not have sampling methods, we will accept the following mixed waste paper and board.
  - **Unsorted mixed paper and board (1.01)** (a mixture of grades of paper and board, without limits on short-fibre content). Materials must be removed that cannot be reprocessed.
  - **Sorted mixed paper and board (1.02)**, where at least 12.5% of the waste is packaging. (This percentage was taken from a random sample of 1,500 tonnes of mixed waste paper, on behalf of the Paper Federation.)

### Old KLS or OCC (or both)

We will count deliveries as made up of 100% waste packaging if there is only a very small percentage of other material within loads. We grade old KLS and OCC as:

- supermarket corrugated paper and board (1.04);
- old corrugated containers (1.05);
- used corrugated kraft 1 (4.02);
- used corrugated kraft 2 (4.03);
- used kraft sacks (4.04);
- mixed packaging (5.02); and
- liquid board packaging (5.03).

### Packaging mixed with scrap steel

The steel industry has well-established procedures for recycling steel, and packaging is often mixed with other scrap steel. It is not always possible to separate the packaging from the steel, so we have designed the following procedure so you can issue ePRNs and ePERNs for a set percentage of steel scrap. If you handle the grades of steel listed below, you can issue ePRNs or ePERNs for the percentages set out in the right-hand column.

Grades of scrap steel	Percentage of waste packaging in the scrap steel
1 and 2 (mixed)	0.55
2	1.1
Fragmentised	4.7
4C	10.6
4E	5
8B	10.6

For example, if you export 1,000 tonnes of fragmentised steel, you can issue ePERNs for up to 47 tonnes of waste packaging.

We will accept these percentages of waste packaging listed above without you having to provide any extra proof of the amount of waste packaging that makes up the load.

You **must** still keep to the percentages shown above if you handle loads made up of 100% of:

- 210-litre drums;
- 25-litre drums;
- baling wire; or
- banding and strapping.

Other grades of scrap steel and waste packaging (for example, cans) are not covered by this document.

If you want to apply a percentage of packaging waste to other grades of scrap steel, you will have to justify the percentages by providing samples that we accept. You should agree the sampling methods with us as part of your sampling and inspection plan. We will assess each sample you provide separately.

### Packaging mixed with scrap aluminium

The aluminium industry has well-established procedures for recycling scrap aluminium, and packaging waste is often mixed with other scrap aluminium. It is not always possible to separate the packaging from the aluminium. The Aluminium Packaging Recycling Organisation (ALUPRO) has worked with us to set percentages which you can use to assume how much packaging waste is in scrap aluminium.

If you handle the grades of aluminium listed below, you can use ePRNs or ePERNs for the percentages set out in the right-hand column.

Scrap grades	Percentage of waste packaging in the scrap aluminium
Old rolled aluminium	13.6
Mixed aluminium alloy cuttings	9.3
New pure aluminium	6.2
New scrap of one aluminium alloy	9

For example, if you export 1,000 tonnes of new pure aluminium, you may issue ePERNs for up to 62 tonnes of waste packaging.

We will accept these percentages of waste packaging listed above without you having to provide any extra proof of how much packaging there is in each load of scrap you receive.

Other grades of aluminium are not covered in this document. If you want to apply a percentage of packaging waste to other grades of scrap aluminium, you will have to justify the percentages by providing evidence that we accept. You should agree the percentages with us as part of your sampling and inspection plan. We will assess each application separately.

### Creating energy from waste

#### Household waste (including bulky rubbish and waste from civic amenity sites)

If you have a contract to burn household waste in an incinerator to create energy, you can issue ePRNs for 19% of the total weight of the waste.

#### Clinical waste

If you have a contract to burn clinical waste in an incinerator to create energy, you can issue ePRNs for 6% of the total weight of the waste.

## Annex C: Acceptable efficiency standards for reprocessors

These standards help make sure that PRNs are only issued for waste that is actually recycled (not lost during the process).

There are standards for how much waste must actually be recycled for each of the five main types of packaging material we have listed in the table below. The quality of the waste you receive is very important, because losses are mainly caused through other materials contaminating the waste.

You may issue ePRNs or ePERNs (or both) against 100% of the weight of the waste packaging you receive, as long as it is reprocessed in line with the following efficiency standards.

Waste packaging you receive	Percentage of waste which must actually be recycled (% recycling efficiency)
Paper and cardboard packaging	85
Glass (at the container works)	98
Glass (at the cullet processing facility)	96
Steel (from the foundry, basic oxygen steelmaking, and electric arc – see the note below)	98
Aluminium	98
Plastics	75

Note: Basic oxygen steelmaking uses pure oxygen to produce steel from liquid blast-furnace iron and scrap. The electric-arc method uses electricity at a high current to melt scrap steel into liquid steel.

If the recycling efficiency is close to the minimum percentages set out above or if it falls below the minimum, we will ask you to explain why before we allow you to issue ePRNs against 100% of the waste packaging you receive. We may also ask you to provide more evidence of why the problem has happened. If the recycling efficiency is much lower than the minimum set out above, we may not accredit your site.

The amount of ash, clinker and other residue from burning waste can vary a great deal. Below, we have set out the maximum percentage of the waste you burn in your process that we accept will be lost as residue.

Equipment you use to burn waste that also generates energy from the process	Maximum percentage of waste (by weight) lost as residue
Municipal incinerator (for burning household waste)	28
Dedicated incinerator (for separated packaging waste)	6

We will only accept higher levels of residue if you can give us reasonable evidence of why the level of residue should be higher for a particular type of waste or a particular method of burning it.

## Annex D: Recovery and recycling activities we accept

We accept the following processes for recovering waste packaging (as one of the conditions of your accreditation).

Recovery code	Process
R1	Using waste mainly as a fuel or for other ways of creating energy (that is, recovering energy)
R3	Recycling or reusing organic waste such as paper, cardboard, wood and plastics (which are not used as solvents). This includes the process of composting and other biological processes
R4	Recycling or reusing metals and metal compounds (for example, steel and aluminium)
R5	Recycling or reusing inorganic waste (for example, glass or ceramics)

This annex sets out our principles for deciding which processes we will accredit under the regulations.

### General principles

- ‘Recovery’ normally means burning packaging waste as a fuel or using it to create energy in some other way. Under the Packaging Directive 94/62/EC, ‘recovery’ means any of the 13 recovery codes set out in Annex IIB to the Waste Framework Directive (2006/12/EC). The codes that apply to waste packaging are shown in the previous table.
- Under the Packaging Directive 94/62/EC, ‘recycling’ means processing waste materials so they can be used again, for the same or a different purpose. It includes organic recycling such as composting, but does not include using waste to create energy (for example, by burning it). Recycling involves a greater amount of effort or processing than recovery.

### Recycling processes we accredit

We apply tests to each process you carry out to help us decide whether your process can be considered as recycling. In creating our tests, we have taken into account general recycling practices in the recycling industry and how the recycled material will be used. We will consider accrediting your process if:

- it processes packaging waste to produce a material which has the same properties and functions as the material the waste was made from; and
- the material you produce will be used instead of material that comes from natural resources.

We will consider each on its particular facts. However, as a general guide we will usually grant accreditations in line with the descriptions we have provided in the table.

Some reprocessing may be carried out in several stages (for example, reducing the size of a material). We can only accredit one of those stages to avoid the risk of counting waste twice. We will accredit the last stage, which results in material that will be used in place of natural resources. We have to take into account:

- what the reprocessed materials will be used for;
- the type and quality the reprocessed material needs to be for it to be used in the way you intend (including whether there are any nationally-agreed standards we have

accepted to make sure the material can be recycled again after it has been used); and

- whether the material will actually be used in the way you claim or whether it may be used for something else.

At this stage we will usually ignore any general quality-control checks that would also be applied to natural resources. We will only consider quality-control checks at the point of recycling if they form part of the process you use to separate the material from other materials.

Some waste packaging can be used to make compost or soil substitute. The regulations provide a specific test to measure whether recycling has taken place. The test is that micro-organisms have been used under controlled conditions to produce methane or stable organic substances (such as compost) from the biodegradable parts of waste packaging. This does not include landfill sites. We will normally grant an accreditation for the process that actually creates the compost or methane.

Some packaging waste can be used as a fuel for creating energy. We only consider that recovery takes place when the waste is burned to release the energy from it. You must be able to measure the energy created. Blending packaging waste (whether with different packaging waste, other waste or other materials) to create a fuel supply is not enough to count as recovering the waste packaging.

For the purposes of accreditation, the waste packaging you reprocess must have been thrown away in the UK.

### Wood packaging and accreditation

The repair and subsequent remanufacture of wood packaging is regarded as ancillary to re-use and is not recovery or recycling. Re-use is not an activity for which accreditation can be considered. Where UK wood packaging waste is reprocessed through a production process, the Agencies will recognise the reprocessing activity to be recycling for the purposes of the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended). The Agencies will permit accredited wood reprocessors to issue wood recycling PRNs in respect of the UK wood packaging waste they receive and reprocess into a new product.

The recovery of energy from UK wood packaging waste will remain a recovery activity and as such only recovery PRNs can be issued in respect of UK wood packaging waste reprocessed in this manner by accredited reprocessors. A business which processes wood packaging waste for supply to an energy from waste facility would not be accredited in respect of that processing activity; the accreditation point for this use will be at the energy from waste facility.

A chipboard manufacturer will be eligible for accreditation in respect of wood packaging processed into chipboard irrespective of the specification/quality of the incoming material. Such material should be accompanied by the appropriate Duty of Care documentation. The chipboard plant operator will need to obtain evidence from their suppliers as to the proportion of the incoming chips that have originated from wood packaging which became waste in the UK. Sites producing wood chips (from packaging waste) and supplying to a chipboard manufacturer are not eligible for accreditation in respect of this material (it is the board manufacturer which is eligible for the accreditation.)

The production of recognised products, for example animal bedding, garden mulch or fencing from packaging waste can be regarded as recycling operations and are normally eligible for accreditation, providing the reprocessor can demonstrate that the end use is beneficial.

Drum reconditioning and accreditation is not an accreditable process. It is classed as re-use of packaging.

Mobile plant operators can be accredited rather than sites.

We have provided the following summary of the reprocessing activities that we will normally accredit under the packaging regulations.

Material	Accreditation
	We will normally grant to businesses which produce the following from waste packaging.
Glass	<ul style="list-style-type: none"> <li>• Glass containers or fibreglass</li> <li>• Fine glass material such as sand substitute, (for example, in sandpaper and sandblasting) and fluxing agents (for example, moulds that metal is poured into or material used in welding)</li> <li>• Aggregate (crushed concrete, bricks and so on used in building roads) made to a recognised standard ready to use or sell to somebody else to use</li> <li>• Decorative crushed glass ready to sell to the person who will use it</li> </ul>
Paper	<ul style="list-style-type: none"> <li>• Paper or board</li> <li>• Animal bedding or packaging material ready to sell to the person who will use it</li> </ul>
Plastic	<ul style="list-style-type: none"> <li>• Plastic pellets ready to use or sell to somebody else to use</li> <li>• Plastic products made direct from shredded waste plastic packaging (for example, shredded plastic bottles)</li> </ul>
Wood	<ul style="list-style-type: none"> <li>• Wood board (for example, chipboard or OSB)</li> <li>• Decorative woodchip or arena chip (used in riding arenas, fuel, temporary car parks and so on) ready to sell to the person who will use it</li> <li>• Animal bedding ready to sell to the person who will use it</li> </ul>
Metals	<ul style="list-style-type: none"> <li>• Metal (aluminium or steel ingots, sheets or coils) from waste packaging</li> </ul>
Organic recycling	<ul style="list-style-type: none"> <li>• Organic compost which will not break down any further</li> <li>• Soil substitutes</li> <li>• Methane</li> </ul>
Energy recycling	<ul style="list-style-type: none"> <li>• Energy from packaging waste</li> </ul>
Other recovery	We will consider accreditation for processes not listed here based on your individual circumstances

If the law changes, we will review the point at which we consider recycling to have taken place and we may revise this annex in line with any changes.

## Annex E: Guidance for accredited exporters on the demonstration of ‘broadly equivalent’ standards overseas

This annex relates to exports of packaging waste to countries outside the European Union. It will be periodically reviewed and may be amended or withdrawn by the environment agencies.

**Please note that this guidance is without prejudice to the requirements of the Waste Shipments Regulation (EC No. 1013/2006), in particular Articles 18 and 49. If you plan to export waste you must check that the destination country is willing to accept that waste type for reprocessing, find out what controls will apply and ensure that each shipment complies with these restrictions.**

**Accreditation as an exporter under the packaging regulations allows you to issue evidence of recovery overseas. It is not permission to export waste.**

This annex is aimed at accredited exporters of UK packaging waste or anyone who is seeking accreditation as an exporter of UK packaging waste. Evidence of recovery may only be issued where the exporter can demonstrate that the exported packaging waste will be dealt with under conditions that are ‘broadly equivalent’ to the environmental standards that apply in the European Union.

If you are unable to provide us with satisfactory evidence of broad equivalence for a particular destination you will not be permitted to issue ePERNs on packaging waste exported to that destination.

### Meaning of ‘broadly equivalent’

‘Broadly equivalent’ means that the recovery/recycling operation will be carried out in a way which achieves the level of environmental protection required by the Waste Framework Directive. That means the overseas reprocessor must operate within a regulatory regime, and should make it illegal for the overseas reprocessor to dump waste or get rid of it in ways that are not controlled. Any regulation should also require that waste be recovered or disposed of without:

- putting people’s health in danger; or
- causing processes or methods which could harm the environment, in particular without:
  - harming water, air, soil and plants and animals;
  - causing a nuisance through noise or smells; or
  - having a negative effect on the countryside or places of special interest. Places may be of ‘special interest’ if they have special cultural, architectural, historical, scientific or other interests.

The regulatory regime may require permits to be held, but it need not necessarily do so. It is essential that the country has a way of assessing whether the site has kept to the standards shown above and that the standards can be enforced.

### Evidence of broadly equivalent standards

We need to assess broadly equivalent standards for reprocessing facilities that are outside the European Union.

The usual requirement is that broadly equivalent standards must be demonstrated by you for each overseas reprocessor to which you send packaging waste to be recovered. There are two exceptions, which are set out under the section headed ‘Circumstances where site-specific evidence of broadly equivalent standards is not required’.

Where you do have to provide site-specific evidence of broadly equivalent standards, our preference is evidence from you

confirming that your overseas reprocessor is regulated by the relevant competent authority. This may be achieved through providing a copy of a relevant environmental licence or permit, or a statement from the competent authority which demonstrates that the reprocessing site is regulated and operates within a regime that achieves broadly equivalent environmental standards as outlined above.

If you cannot provide this, the agencies may consider a statement from the reprocessor that the site is regulated, and operating within a regime that ensures broadly equivalent environmental standards to those that apply in the European Union. This must be accompanied by an explanation as to why evidence from a competent authority could not be provided. We would also expect to be provided with supporting information including:

- details of the regulatory regime under which the site operates;
- contact details for the relevant environmental regulator(s);
- a copy of a recent inspection report from the environmental regulator; and
- details of any certification held by the reprocessing site relating to environmental standards.

All documentary evidence and statements submitted must be originals and be accompanied by a certified English translation if the originals are not in English.

We will allow Broadly Equivalent status to be demonstrated by other mechanisms such as confirmation from national government (or state/provincial government where appropriate) or the relevant regulator that all facilities within their jurisdiction operate within a suitable regulatory framework. Trade associations may wish to try and secure such confirmations for the benefit of their members and material sectors.

If you cannot provide satisfactory evidence that an overseas reprocessor meets environmental standards that are broadly equivalent to standards in the European Union, we will not give you permission to issue recovery evidence on UK packaging waste you export to that reprocessor.

### Must the supporting documents be obtained each year?

We are phasing-in a process that will allow exporters to rely on supporting documents for a 3-year period on a rolling basis. (There will be exceptions where the original supporting documents had a time limit, for example where a permit or licence expires within the 3 years).

This new arrangement is being introduced as follows:

For exports of metals to a non-OECD country, an exporter can rely on supporting evidence accepted by the environment agencies for issuing evidence in 2007. These supporting documents will remain valid for 2008 and 2009.

### What does this mean for an exporter wishing to export UK metal packaging waste to a reprocessor in a non-OECD country in 2009?

You will not need to obtain supporting documents for that facility if we accepted the adequacy of supporting documents for the facility for exports in 2007 or 2008.

If we have approved a facility in 2009, you will usually not have to provide supporting documentation for that facility in 2010 or 2011.

What does this mean for an exporter wishing to export UK non-metal packaging waste to a reprocessor in a non-OECD country in 2009?

You will need to obtain supporting documents for that facility. You will usually not need to do so for 2010 or 2011.

**Circumstances where site-specific evidence of broadly equivalent standards is not required?**

You are **not** required to provide us with site-specific evidence for each overseas reprocessor where:

- the exports of UK packaging waste are going for recovery in an OECD\* country; **or**
- where the exports are to a non-OECD\* country outside the European Union and we are satisfied that all the relevant conditions are met.

The relevant conditions are:

- a) The packaging waste has been source segregated or has been processed to ensure that it is exported within a shipment of similar material.  
For example, the shipment contains steel drinks cans amongst compatible steel scrap and is not a general mix of one material and another, such as paper and plastic or a mixture of different grades of the same material, e.g. different plastic polymers.
- b) There is a well-established international technical specification system for the exported packaging waste material and the exported material meets the appropriate specification. These specifications serve as an implicit quality assurance system between companies along the supply chain;
- c) The material requires minimal processing overseas prior to being recovered and the recovery process has process losses in line with industry norms in the European Union.
- d) Processing prior to recovery should not require any hand sorting of the waste material which may give rise to significant harm to human health.
- e) The material is subjected to a recognised form of recovery and unlikely to give rise to significant environmental harm.

It is our view that currently the above conditions are only likely to be met for exports of metal packaging waste, including metal packaging waste within shipments of appropriate grades of scrap metal.

If you are exporting metal packaging waste and you believe that these conditions apply you will need to confirm these conditions when you apply for accreditation. You will be expected to retain documents to demonstrate, if requested by the appropriate agency, that you have met these conditions for any exported material.

**Annex F: Example letter from a foreign regulatory authority demonstrating that their reprocessing sites meet standards which are ‘broadly equivalent’ to environmental standards in the UK**

This is an example of a letter we would accept as evidence that the relevant authority in charge of the foreign reprocessing site has confirmed the reprocessing will meet the environmental standards that apply in the UK.

“We confirm that if

[details of reprocessor]

reprocesses the following waste at the following sites, by law, their reprocessing will have to achieve the standards shown below.

Details of waste (paper, plastic and so on)	Name and address of sites where this waste is reprocessed to the standards shown below

By law, the reprocessor must recover or get rid of the waste in a way that does not put people’s health in danger or harm the environment. In particular, the reprocessor must not:

- harm water, air, soil or plants and animals;
- cause a nuisance through noise or smells; or
- have a negative effect on the countryside or places of special interest. (A place of special interest is somewhere with special cultural, architectural, historical, scientific, or other importance.)

Also, by law, the reprocessor is not allowed to dump or get rid of the waste in a way that is not controlled.”

\* The list of OECD member countries is available here: [http://www.oecd.org/countrieslist/0,3351,en\\_33873108\\_33844430\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/countrieslist/0,3351,en_33873108_33844430_1_1_1_1,00.html)

