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Item 5 (a) (v) of the provisional agenda**

**Review of general issues of compliance and
implementation under the Convention:
national reporting: tables 4 and 5 of the reporting format**

National reporting

Tables 4 and 5 of the reporting format¹

Note by the Secretariat

As is mentioned in the note by the Secretariat on national reporting (UNEP/CHW/CC.16/3) the annex to the present note sets out a report reviewing the information provided in tables 4 and 5 of the national reports for the years 2020 and 2021 with a view to identifying discrepancies in the information reported by Parties, including draft recommendations for improving national reporting to be consulted with the Open-Ended Working Group during its fourteenth meeting.

* The Committee may decide to convene additional sessions.

** UNEP/CHW/CC.16/1.

¹ This document has not been formally edited.

Annex

Report reviewing the information provided in tables 4 and 5 of the national reports for the years 2020 and 2021

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Introduction

1. By Decision BC-16/14, the sixteenth meeting of the Conference of the Parties to the Basel Convention adopted the work programme of the Committee Administering the Mechanism for Promoting Implementation and Compliance with the Basel Convention (Committee) for the biennium 2024–2025, whereby it requested the Committee to undertake a number of activities to improve national reporting including by considering whether a review of the information provided in tables 4 and 5 of the national reports for the years 2020 and 2021, taking into account relevant experience of Parties, could help identify discrepancies in the information reported by Parties and by making recommendations accordingly through consultations with the Open-Ended Working Group.
2. Parties to the Convention have an obligation pursuant to paragraph 3 of Article 13 to transmit information,² on an annual basis, in a format adopted by the Conference of the Parties and through the Secretariat of the Convention to the Conference of the Parties. This is referred to as national reporting. The information, which includes both data on the generation and transboundary movements of waste and information on legal and policy measures, is collected through an electronic reporting system (ERS). Over the years, the Conference of the Parties has adopted guidance documents to assist Parties with the transmission of national reports, most notably the manual for completing the format for national reporting.
3. The present report identifies discrepancies in the data reported by Parties with the aim to improve national reporting. The information provided by Parties in tables 4 and 5³ of the national reports transmitted for the years 2020 and 2021 is reviewed, taking into account the Secretariat's publications *Waste Without Frontiers I* and *II*.⁴ The report also sets out draft recommendations to improve national reporting for the consideration of the Committee and for consultation with Open-ended Working Group.
4. The present report focuses on the consideration of selected transboundary movements (TBMs) of wastes as reflected in the national reports for the years 2020 and 2021. For comparison purposes, data from previous years are taken from the Secretariat publications *Waste without Frontiers I* and *Waste without Frontiers II*.⁵ The analysis was based on the reported export data, for which the corresponding import data, if available, was analysed.
5. The present report should be read having in mind the national reporting format, the Manual for completing the format for national reporting under the Basel Convention, the draft user manual for the electronic reporting system of the Basel Convention⁶, and the revised notification and movement documents for the control of transboundary movement of hazardous wastes and instructions for completing these documents.⁷
6. The development of the present report was prepared thanks to a generous financial contribution from the European Union.

² All reports are available on the website of the Basel Convention at: <http://www.basel.int/Countries/NationalReporting/NationalReports/tabid/4250/Default.aspx>.

³ See <https://www.basel.int/Countries/NationalReporting/NationalReports/BC2021Reports/tabid/9379/Default.aspx> and <https://www.basel.int/Countries/NationalReporting/NationalReports/BC2020Reports/tabid/8989/Default.aspx>.

⁴ The publications are available at: <https://www.basel.int/Implementation/Publications/Other/tabid/2470/Default.aspx>. *Waste without frontiers I* is directly accessible at: <https://www.basel.int/Portals/4/Basel%20Convention/docs/pub/ww-frontiers26Jan2010.pdf>, *Waste without frontiers II* is directly accessible at: <https://www.basel.int/Portals/4/Basel%20Convention/docs/pub/WasteWithoutFrontiersII.pdf>.

⁵ The publications are available at: <https://www.basel.int/Implementation/Publications/Other/tabid/2470/Default.aspx>. *Waste without frontiers I* is directly accessible at: <https://www.basel.int/Portals/4/Basel%20Convention/docs/pub/ww-frontiers26Jan2010.pdf>, *Waste without frontiers II* is directly accessible at: <https://www.basel.int/Portals/4/Basel%20Convention/docs/pub/WasteWithoutFrontiersII.pdf>

⁶ All three are available at: <https://www.basel.int/Countries/NationalReporting/Formatandmanualsfornationalreporting/tabid/8754/Default.aspx>.

⁷ Available at: <https://www.basel.int/Procedures/NotificationMovementDocuments/tabid/1327/Default.aspx>.

I. Data basis

A. Data used in the report

7. TBMs by definition involve more than one country. In all cases, there is a country of origin or State of export and a country of destination or State of import. In some cases, one or more States of transit are also involved. When analysing the data on TBMs, the following considerations should be taken into account. First, not all Parties fulfill their obligation to transmit a national report and, if they do, they do not necessarily provide complete information in tables 4 and 5 on, respectively, the export and the import of hazardous wastes and other wastes. Second, the individual Parties that report on TBMs is different each year. Third, in certain circumstances, countries that are not a Party to the Convention may be involved in a TBM but they are not obliged to transmit a report to the Secretariat.

B. Methodology used to analyse data on transboundary movements

8. Based on the export data of selected countries (see table 1) or selected waste streams (see section II.D.1) it was first checked if the importing countries have transmitted a report. If the importing country has reported, it was further analysed if the report is in conformity with the export data, or if there are discrepancies in the information reported by Parties concerning:

- (a) Amount of wastes;
- (b) Reporting year;
- (c) No. of shipments/movements;
- (d) Waste classification.

9. Furthermore, at least for the reported export data for 2020, it was checked whether any discrepancies in the amounts resulted from the fact that the exporting country reported the total amount in one year, while the importing country reported the amounts spread over two years.

10. When analysing the TBMs of the selected Parties, each individual movement was analysed on the export and import side. In the analysis of the selected waste streams (see section II.D.1), however, the TBMs were collectively considered.

1. Selection of Parties that reported exports in the years 2020 and 2021

11. The TBMs to be analysed were selected both in terms of geographical representation and in terms of main waste streams. For this purpose, among those Parties that transmitted a national report for either 2020 or 2021, five countries per regional group of the United Nations were randomly initially selected for each of the two years, with different countries for each of the years 2020 and 2021. Accordingly, a total of ten countries were analysed for each region. A random selection of waste streams was chosen for those countries that reported many TBMs. In addition, some identified main waste streams, according to the statistical data for the given years, or findings from the analysis and current developments within the framework of the Basel Convention, were analysed in more detail.

Table 1: Exporting countries selected

Regional group	Year	
	2020	2021
Africa	Cabo Verde, Egypt, Kenya, Democratic Republic of the Congo, Nigeria	Algeria, Benin, Ghana, Mozambique, South Africa
Asia Pacific	China, Pakistan, Maldives, Cyprus, Jordan	Indonesia, Japan, Seychelles, Singapore, Philippines
Eastern Europe	Armenia, Georgia, Mongolia, Ukraine, Estonia	Bosnia and Herzegovina, Bulgaria, Czech Republic, Montenegro, Poland
GRULAC	Argentina, Colombia, Jamaica, Peru, Trinidad and Tobago	Barbados, Brazil, Costa Rica, Guatemala, Mexico
WEOG	Denmark, Italy, Malta, New Zealand, Switzerland	Australia, Belgium, Iceland, Portugal, Sweden

2. Units used in the report

12. The waste amounts as reported in this study are in metric tonnes. For the numbers the point "." is used as 1000 separator, while a comma "," indicates decimals as it was also used in Waste without Frontiers (WWF II).

3. Corrections to amounts reported

13. Some corrections to the amounts reported had to be made for calculation purposes concerning the total amount and the amounts of Y categories only. In the reporting year 2020, Mongolia reported two exports without giving any amount. For the purpose of this report, the amount of wastes were set to zero. Concerning the year 2021, some non-realistic amounts were also corrected. The reported export of 84.814.117 t spent catalyst (B1120) from Thailand to Japan in the year 2021 was set to 84,8 t, based on comparable exports. The reported export of 3.436.220 t of Y23 from Spain to Italy was set to 34.363 t, after comparing similar exports from Spain in previous years.

4. Calculation of the amount of Article 1 (1) b wastes exported

14. The amounts of Article 1 (1) b wastes have be calculated by deduction of the quantities of Annex II wastes and hazardous wastes according to Article 1 (1) from the total amount of wastes exported, as follows:

$$1 (1) b \text{ wastes} = \text{total amount exported} - [Y46 + Y47 + Y48 + 1 (1) a]$$

II. Results of the survey

A. Reporting by Parties

15. Transmitting an annual report is an obligation under the Convention. However, there is a significant number of Parties that do not report or that transmit incomplete reports. Based on the classification of compliance performance undertaken by the Committee, around 60% of the Parties fulfil their obligation and transmit their report in a given year, and the rate of transmission of complete reports, although only at 27% for the year 2019, has been steadily improving since 2015.⁸ There is therefore considerable scope to improve the rate of transmission of complete national reports.

16. Table 2 provides an overview of the number of Parties that transmitted a report in the given year and how many of these reports contain data on TBMs. Even with the revised reporting format to be used for the year 2016 and onwards, the situation has not changed significantly.

17. Based on the reports on exports and imports for the years 2020 and 2021 several Parties do not have any imports and exports and therefore do not report data. The number of Parties reporting imports is lower than the number of Parties reporting exports. In 2020, out of the 186 Parties required to report, no exports were reported by 25 Parties and no imports were reported by 62 Parties. In 2021, out of the 187 Parties required to report, no exports were reported by 22 Parties and no imports were reported by 55 Parties.

18. Although some Parties report that waste was exported or imported in the reporting years, they do not provide complete data. In 2020 four Parties⁹ and in 2021, eight Parties¹⁰ did not report detailed data on export.

Table 2: Overview of the number of Parties that transmitted reports and of the quantitative data included in these reports

Status	2007 ^{#)}	2008	2009	2010	2011	2012	2013	2014	2015	2020	2021
Total number of Parties ^{*)}	169	171	171	174	177	178	179	180	182	186	187
Number of reports transmitted	102	84	96	88	89	89	90	98	87	116	105
Number of Parties reporting imports	40	37	47	42	34	30	38	43	41	54 ¹⁾	50 ²⁾
Number of Parties reporting exports	71	63	68	65	56	50	68	63	68	91 ³⁾	83 ⁴⁾
<p>*) The number of Parties that are required to transmit a report in the given year; the Member States of the EU that are Parties are included but the EU is not counted in addition to those Member States.</p> <p>#) The data from 2007 to 2015 are taken from Waste without frontiers II, Status of the data for 2020/21 is October 2023</p>											

⁸ See document UNEP/CHW/CC.16/3/Add.2.

⁹ Canada, India, Russia, Uzbekistan.

¹⁰ Albania, Canada, Ethiopia, India, Namibia, Russia, Uzbekistan, Vietnam.

1) Four countries did not report detailed data 2) Four countries did not report detailed data
 3) Eight countries did not report detailed data 4) Five countries did not report detailed data

B. Number of waste streams analysed

19. The TBMs involving the 50 selected Parties as countries of export and related countries of import were analysed from the viewpoint of the exporting country. In the case of exporting countries with many individual movements, a selection was made from the total number of annual movements, taking into account as many importing countries as possible. For every export, it was checked whether an import was reported or not, and whether there was any discrepancy in the amount of waste exported respectively imported. The following table gives a numerical overview on the obtained results.

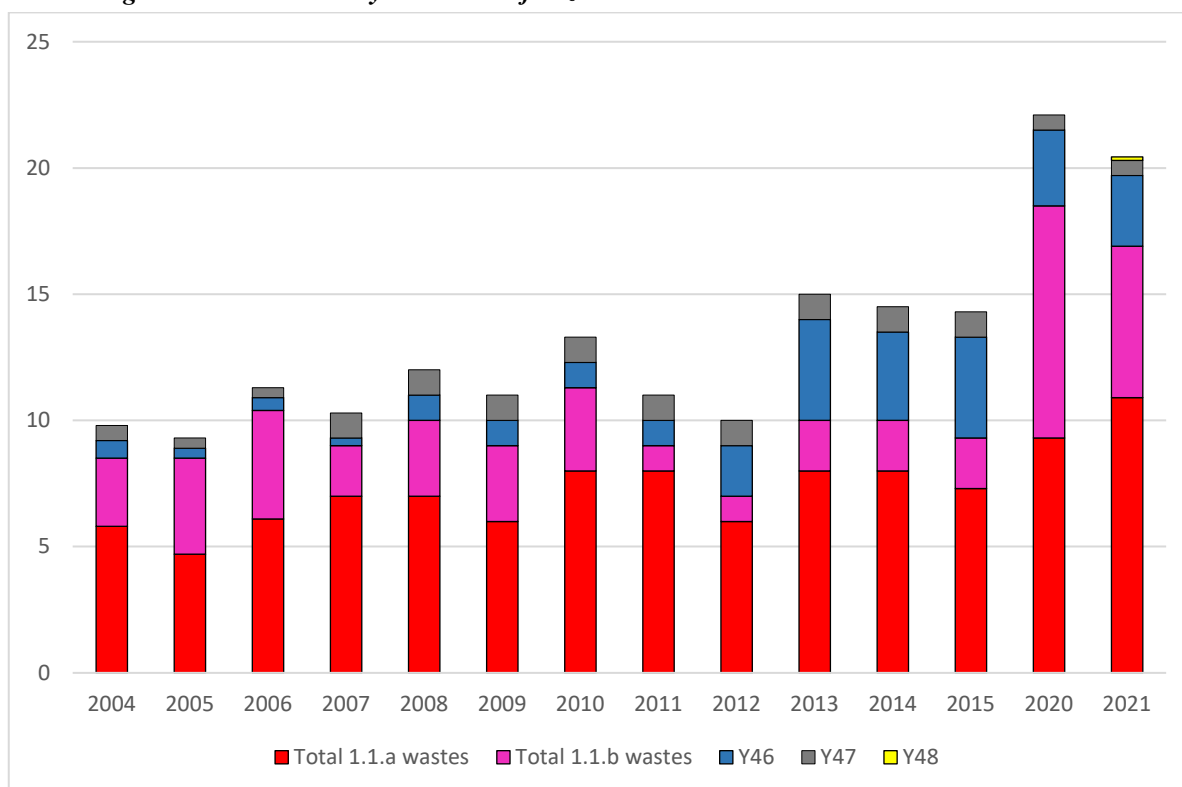
Table 3: Overview of the examination of movements

Year	Movements checked In total	Reports available		Amounts reported		
		Export and import	Export only	No discrepancy	Discrepancy <10%	Discrepancy >10%
2020	158	99	59	55/99	29/99	15/99
2021	250	126	124	35/126	23/126	68/126

C. General view of waste streams exported

20. Figure 1 shows the evolution of waste exports reported by all reporting Parties over the time period 2004 to 2015¹¹ supplemented by the data from the national reports for 2020 and 2021. The increase in the total amount of waste exported is mainly due to the almost doubling of the exports of Article 1 (1) b wastes over the last decade. The sharp increase in household waste exports between 2007 and 2015 appears to have consolidated. It should be noted that the calculations for 2020 and 2021 were based on the compilation of raw data provided by the Secretariat as at October 2023. This means that deviations may arise following the insertion of late reports from the Parties and further plausibility checks of the data by the Secretariat of the Basel Convention.

Figure 1: Transboundary movement of hazardous wastes and other wastes



21. Compared to the waste streams mentioned in the Waste without frontiers I publication, analysing the data from national reports for the years 2004 – 2006, the reported waste streams subject to TBMs in 2020 and 2021 are mostly the same types of waste.

¹¹ Data taken from Waste without frontiers II.

22. Based on the export data for 2020, the following ten main waste streams were identified:
- | | | |
|-----|---|---------------------|
| (a) | Residues arising from industrial waste disposal operations ¹² (Y18): | 3,2 million tonnes; |
| (b) | Household waste (Y46) ¹³ : | 3,0 million tonnes; |
| (c) | Lead-containing waste (Y31): | 1,4 million tonnes; |
| (d) | Zinc compounds (Y23): | 0,9 million tonnes; |
| (e) | Waste containing tar (Y11): | 0,7 million tonnes; |
| (f) | Emulsions, oil/water mixtures (Y9): | 0,7 million tonnes; |
| (g) | Residues from the incineration of waste (Y47): | 0,6 million tonnes; |
| (h) | Waste oil (Y8): | 0,3 million tonnes; |
| (i) | Waste from wood preservatives (Y5): | 0,3 million tonnes; |
| (j) | Organic solvents (Y42): | 0,2 million tonnes. |
23. In 2020, tar-containing waste appeared in the top ten list for the first time, displacing acids and alkalis, which were still a main waste stream at the time.
24. There have been some shifts in the main waste streams in 2021. It is noticeable that the amounts of waste shipped that were classified with several Y codes increased sharply. The order of the main waste streams in 2021 is as follows.
- | | | |
|-----|---|---------------------|
| (a) | Residues arising from industrial waste disposal operations (Y18): | 3,5 million tonnes; |
| (b) | Household waste (Y46): | 2,8 million tonnes; |
| (c) | Non specific waste (multiple Y): | 1,4 million tonnes; |
| (d) | Lead-containing waste (Y31): | 1,0 million tonnes; |
| (e) | Emulsions, oil/water mixtures (Y9): | 0,9 million tonnes; |
| (f) | Waste containing tar (Y11): | 0,8 million tonnes; |
| (g) | Zinc compounds (Y23): | 0,7 million tonnes; |
| (h) | Residues from the incineration of waste (Y47): | 0,6 million tonnes; |
| (i) | Asbestos (Y36): | 0,4 million tonnes; |
| (j) | Waste oil (Y8): | 0,3 million tonnes. |
25. In addition to the unspecified waste (multiple use of Y codes), asbestos is new to the list of main waste streams in 2021. The two last waste streams in 2020, Y5 and Y42, do not appear in the top ten list in 2021.
26. Although the Waste without frontiers II publication, analysing the data from national reporting for the years 2007 – 2015, does not name any main waste streams, it analyses the shipments of household waste (Y46), residues from the incineration of waste (Y47), used lead acid batteries (ULAB) (Y31), waste oil (Y8) and mercury waste (Y29) in more detail. With the exception of the latter waste stream, these wastes continue to represent the main waste streams subject to TBM.
27. A closer look at the waste subsumed under Y18 shows that Y18 is partly used as a catch all with a variety of different types of waste shipped under this entry. With regard to the waste shipped under Y46, the largest waste stream in terms of volume is refuse derived fuel (approx. 50%).
28. The largest proportion of Y18 is exported by WEOG countries, with the EU countries accounting for a large share. Therefore, for reports that do not specify a Basel Convention waste code (whether from Annex I, II, VIII or IX), it is possible to consider which waste types are actually shipped based on the partial specification of other waste codes from, for instance the waste description, the European Union Waste List¹⁴ or the OECD Decision on the Control of Transboundary Movements of Wastes Destined for Recovery Operations.¹⁵ Some of the main types of waste are:

¹² Waste from waste treatment.

¹³ Of which approx. 50 % are exports of refuse derived fuel (RDF) exported from the United Kingdom.

¹⁴ Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000D0532>.

¹⁵ Available at: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0266>.

- (a) Sewage sludge;
- (b) Chlorofluorocarbons or halons;
- (c) Treated wood;
- (d) Contaminated soil;
- (e) Waste from flue gas cleaning;
- (f) Shredder residues.

29. Other waste streams subsumed under Y18 that is not generated during waste treatment but comes from other sources are for example:

- (a) Aluminium salt slag;
- (b) Mineral fibre waste.

30. As outlined above, another waste stream subject to TBM has become very important in recent years, namely refuse derived fuel (RDF). Refuse-derived fuel (RDF) is a fuel produced from various types of waste such as municipal solid waste (MSW), industrial waste or commercial waste. RDF consists largely of combustible components of such waste, as non recyclable plastics (not including PVC), paper cardboard, labels, and other corrugated materials. These fractions are separated by different processing steps, such as screening, air classification, ballistic separation, separation of ferrous and non ferrous materials, glass, stones and other foreign materials and shredding into a uniform grain size, or also pelletized in order to produce a homogeneous material which can be used as substitute for fossil fuels in e.g. cement plants, lime plants, coal fired power plants or as reduction agent in steel furnaces.

D. Discrepancies in the amount of waste reported by exporting and importing countries

31. The basis for determining the data to be reported in tables 4 and 5 is the notified shipments of wastes moved across borders. These data are collected from the notification document and the movement documents. There are basically two different types of movements: single movements with only one transport of waste, and multiple movements with several individual deliveries spread over the authorised movement period. This period is limited to a maximum of one year under the Basel Convention.¹⁶ Within the OECD area, consents with a term of three years are possible for pre-authorised recovery facilities (PRFs).

32. One would expect the export volumes reported by the exporting country to be the same as the import volumes reported by the importing countries, and the waste data to be the same as shown in the examples in the following table. Small differences in the amounts may be based on rounding or losses due to evaporation. Differences can also be due to the fact that one country states the notified quantity and the other country the quantity shipped, which often is lower.

Table 4: Examples where there is no discrepancy in the amount of waste reported by the exporting and importing countries

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Colombia/2020	A4030	Y4		Obsolete Pesticides		21,48	D10	
Denmark/2021	A4030	Y4	200119, 020108, 070413		H3, H6.1, H8, H1, H12	21,48	D10	
Bosnia and Herzegovina/2021	A4070			waste paint and varnish	H3, H4.1	20,20	D10	
Germany/2021	A4070	Y12	080111 ¹⁷		H3	20,16	D10	
Ukraine/2020	A4030	Y4			H6.1, H12	420,89	D10	
France/2020	A4030	Y4	02 01 08*		H12, H6.1	420,89	D10	

¹⁶ Article 6 paragraph 8 of the Basel Convention.

¹⁷ The asterisk in the EWL Codes is only indicative. The hazardous waste is fully classified with the six-digit code alone. Countries report with or without an asterisk depending on their own system.

33. In the case of individual movements, no problems should normally arise and, provided that the exporting and importing countries have reported, there should generally be consistency between the reported information. However, discrepancies can result in the event movements that take place around the turn of the year, as table 5 shows. All data match in terms of waste categorisation and disposal method. The discrepancy in the amount of waste is due to rounding, as the figures on the German Environment Agency website are only given in full tonnes. However, the most notable difference is in the reporting years. The reason for this is most likely that the transport by ship left New Zealand in 2021 but only arrived at the disposal facility in Germany in 2022. Concerning the export of waste oil from Cabo Verde to Portugal the same amount imported is reported by Portugal but in two parts.

Table 5: Examples of discrepancies in the amount of waste reported by the exporting and importing countries due to differences in the year used to report the TBM

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
New Zealand/2021	A4030	Y4		Solid and liquid pesticides	H6.1	8,82	D10	
Germany ¹⁸ /2022	A4030		200119*	Pestizide aus Siedlungsabfällen		9,00	D10	
Cabo Verde/2020	A4060	Y8, Y9	130701, 130899	Used Mineral Oil		978,60		R3, R9
Portugal/2021	A4060	Y8, Y9	130701; 130899			771,60		R3, R9
Portugal/2021	A4060	Y8, Y9	130701; 130899			207,00		R3, R9
					Σ	978,60		
Argentina/2020	A3180	Y10	Y10, Y48/Y10	PCB waste	H11, H12	52,347	D10	R4
France/2020	A3180	Y10	130301*, 160209*, 170902*		H11	22,020	D10	
France/2021	A3180	Y10	130301*, 160209*, 170902*		H11	104,640	D10	
					Σ	126,66		

34. Since no export data from Argentina for 2021 was available at the time of the drafting of the present report, it was not possible to check whether the additional amount reported by France in 2021 may be due to a further movement initiated in 2021. Here lies a general challenge when analysing the reported movements as it is not possible to determine from the national reports whether information reported on individual TBMs items are:

- (a) Statistical data based on one notification;
- (b) Summarised statistical data of several notifications pertaining to the same waste;
- (c) Statistical data of individual movements from a general notification;
- (d) Statistical data on movements occurred in the reporting period; or
- (e) Statistical data based on movement reported with different criteria (gross weight or net weight; notified amount or moved amount).

35. This challenge is all the more acute in the case of multiple movements and is a reason for discrepancies in the reported amounts. The problem with movements around the turn of the year can be illustrated by the examples in table 6.

¹⁸ Data from webpage of the German Environment Agency: <https://www.umweltbundesamt.de/en/topics/waste-resources/transfrontier-movement-of-wastes-destined-for/statistics-concerning-transfrontier-shipment-of>.

Table 6: Examples of discrepancies in the number of movements and in the amounts of wastes reported by the exporting and importing countries

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Georgia/2020	A2030		160807			38,270		R13
Lithuania/2020		Y36	160807			1,005		R13
Lithuania /2020	A2030		160807			0,498		R13
Lithuania /2020	A2030		160807			0,501		R13
Lithuania /2020	A2030		160807			0,922		R13
Lithuania /2020	A2030		160807			1,889		R13
Lithuania /2020	A2030		160807			2,693		R13
Lithuania /2020	A2030		160807			2,085		R13
Lithuania /2020	A2030		160807			1,014		R13
Lithuania /2020	A2030		160807			1,018		R13
Lithuania /2020		Y36	160807			2,685		R13
Lithuania /2020		Y36	160807			3,688		R13
Lithuania /2020	A2030		160807			1,138		R13
Lithuania /2020	A2030		160807			10,922		R13
Lithuania /2020	A2030		160807			1,036		R13
Lithuania/2020					Σ	31,094		
Denmark/2020	A4100	Y18	190105, 190107, 190113		H6.1	2468,44		
Norway/2020	A4100	Y18		190105	H6.1	1.100,09		R5
Norway/2020	A4100	Y18	7096	190105	H6.1	3.129,41		R5
					Σ	4.229,50		
Cyprus/2020	A1160	Y31	160601	Lead-Acid Car Batteries	H8	2.115,97		
Greece/2020	A1160	Y31	160601*	lead acid batteries	H8	690,52		R4
Greece/2020	A1160	Y31	160601*	lead acid batteries	H8	208,48		R4
Greece/2020	A1160	Y31	160601*	lead acid batteries	H8	672,22		R4
Greece/2020	A1160	Y31	160601*	lead acid batteries	H8	629,07		R4
					Σ	2.200,29		

36. Within the scope of the present report, which is based on the reports transmitted by the Parties, it is not possible to further explain all of the apparent discrepancies. This can only be done by the directly-involved exporting and importing countries which have the original data from the notification documents (single or general notification) and which can be matched using the unique notification number¹⁹ of block 3 of the notification document. The unique notification number allows, among other things, a comparison between the waste moved and its classification. The amounts moved can then also be compared with the movements documents associated with the notification documents based on the unique notification number.

1. Examination of the amounts of selected waste streams subject to TBMs

(a) TBMs of Y18

37. The export of Y18 has been at the top of the exported waste streams for years. The Basel Convention code Y18 is used by the reporting Parties in a variety of ways, such as a catch-all item. For this reason, some of the individual waste streams captured by Y18 were analysed in more detail. Treated wood was selected as a first case for closer examination from the large number of waste streams reported under Y18, as it represents a relevant waste stream at around 70.000 tonnes.

38. Based on the Basel Convention code Y18 and the European Waste List (EWL)-Code²⁰ 191206, the export of wood waste from Denmark to Germany destined for R1 has been analysed (see table 7). Denmark reports 19 movements whereas Germany reports all exports as one import and a

¹⁹ Compare page 51 of the "Instructions for completing the notification and movement documents" in Appendix 6 of the "Guide to the control system - Instruction manual for use by those persons involved in transboundary movements of hazardous wastes", UNEP/CHW.12/9/Add.3/Rev.1.

²⁰ Concerning European Waste List (EWL) see: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0955>.

slightly higher amount of imported wood waste in 2020. Furthermore, Germany uses H11 instead of H4.1 to classify the hazard characteristic of the waste.

Table 7: TBM of Wood waste from Denmark to Germany in year 2020

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Denmark/2020		Y18	191206	AC170	H4.1	71.530,83		R1
Germany/2020		Y18	191206	Wood waste treated with wood preservatives	H11	72.303,94		R1

39. Another case analysed was the export of Y18 from Italy to various countries in 2020, which are listed in detail in the table 8 below which shows that between the total amount exported by Italy and the total amount imported by all countries there is an import surplus of around 133.000 t in the year 2020.

Table 8: Export of Y18 from Italy to different countries in year 2020

Export of Y18 from Italy to:	Amount (t)
Germany	166.515,21
France	136.982,41
Austria	50.353,15
Switzerland	35.280,60
Portugal	30.115,00
Spain	24.966,69
Other countries	56.498,61
Total export	500.711,67
Thereof EWL Chapter 19*)	488.165,80
Other EWL Chapters	12.545,87
Total import from Italy reported by all reporting countries	633.869,51
*) Chapter 19 of EWL lists wastes from waste treatment operations	

40. These exports of Y18, Chapter 19 of EWL to Germany have been further analysed according to waste treatment operations D1, D10 and R5 as shown in the tables 9-11 below. In some cases, there are significant differences in the amounts of waste reported.

Table 9: Export of Y18 from Italy to Germany destined for D10 in year 2020

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Italy/2020		Y18	190204			41.227,97	D10	
Germany/2020		Y18	190204	Mixed haz. waste	H6.1	39.885,97		
Italy/2020		Y18	190304			1.905,67	D10	
Germany/2020		Y18	190304	Mixed haz. waste		9.225,80	D10	
Italy/2020		Y18	190211			4.091,00	D10	
Germany/2020		Y18	190211	Mixed haz. Waste/ Residues from MTW		4.672,03	D10	
Italy/2020	No export of EWL 190306 and EWL 190813 reported by Italy							
Germany/2020		Y18	190306	Mixed haz. waste		84,17	D10	
Germany/2020		Y18	190813	Industrial sewage sludge		121,94	D10	
Italy/2020		Y18		total wood waste exported		47.224,64		
Germany/2020		Y18		total wood waste imported		53.783,80		

41. As shown in table 10, the main difference in the reports with regards to the amounts of wastes concern the EWL code 190304. Another difference are the EWL codes reported as import by Germany but not reported as export by Italy.

Table 10: Export of Y18 from Italy to Germany destined for R5 in year 2020

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Italy/2020	A4100	Y18	190105			14.383,14		R5
Germany/2020	A4100	Y18	190105		H11	52.702,46		R5
Italy/2020	A4100	Y18	190107			1.967,80		R5
Germany/2020	A4100	Y18	190107		H11	3.551,66		R5
Italy/2020	A4100	Y18	190113			5.594,46		R5
Germany/2020	A4100	Y18	190113		H11	21.063,78		R5
Italy/2020	A4100	Y18	190115			6.871,06		R5
Germany/2020		Y18	190115	Ashes from WI	H11	6.871,82		R5
Italy/2020		Y18	190304			8.505,21		R5
Germany/2020		Y18	190304	Mixed haz. waste	H6.1	11.592,44		R5
Italy/2020		Y18	190306			1.485,84		R5
Germany/2020		Y18	190306	Mixed haz. waste	H6.1	1.402,24		R5
Italy/2020		Y18				total export		
Germany/2020		Y18				total import		
						36.839,71		
						97.184,40		

42. As shown in table 10, Italy reports the export of 36.839,71 t of waste categorized as Y18 and destined for R5, while Germany reports the import of 97.184,4 t. Differences in waste classification used may be the main reason for the discrepancy.

Table 11: Export of Y18 from Italy to Germany destined for D1 in year 2020

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Italy/ 2020	A4100	Y18	190105			2.013,10	D1	
Germany/ 2020	A4100	Y18	190105		H11	2.019,12	D1	
Italy/2020	A4100	Y18	190115			2.525,00	D1	
Germany/2020		Y18	190115	Ashes from WI	H11	2.549,80	D1	
Italy/2020	A1050	Y18	190204			6.674,34	D1	
Italy/2020		Y18	190205			29.577,87	D1	
Germany/2020	No import of EWL 190204 and EWL 190205 reported by Germany, but A1050/Y17							
Italy/2020		Y18	190304			8.862,03	D1	
Germany/2020		Y18	190304	Mixed haz. waste	H6.1	9.045,09	D1	
Italy/2020						total export		
Germany/2020						total import		
						49.652,34	D1	
						13.614,01	D1	

43. As shown in table 11, Italy reports the export of 49.652,34 t of waste categorized as Y18 and destined for D1 while Germany reports only the import of 13.614,01 t. Germany reports around 900 t of A1050/Y17 but that does not close the gap in reporting.

(b) TBMs of refuse derived fuel (RDF)

44. The quantity of waste exported as refuse derived fuel (RDF) is very significant in the reported exports of collected wastes from households (Y46). The main exporter is the United Kingdom. As shown in table 12, the total export of refuse derived fuel (RDF) from the United Kingdom in 2020 is 1.539.739,74 t, which is nearly the half of all exports of Y46 in the year 2020. The import reported by countries receiving RDF from the United Kingdom in the year 2020 is 1.538.256,07 t. These calculations have been made without counting the amounts exported to the United States of America.

Table 12: Export and related imports of refuse derived fuel (RDF) from United Kingdom

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
United Kingdom/2020	Y46		191212	Refuse derived fuel (RDF)	H	151.955,56		R1
Germany/2020	Y46		191210	Pretr. household waste		41.858,89		R12
United Kingdom/2020	Y46		191210	Refuse derived fuel (RDF)	NA	107.553,49		R1
Denmark/2020			191210	Unlisted	H	71.614,42		R1
United Kingdom/2020	Y46		191210	Refuse derived fuel (RDF)	H	539.138,75		R1
Netherlands/2020		Y18	191210			616.040,77		R1
United Kingdom/2020	Y46		191210	Refuse derived fuel (RDF)	NA	127.767,57		R1
Norway/2020	Y46		9913	191210		131.570,09		R1
United Kingdom/2020	Y46		191210	Refuse derived fuel (RDF)	NA	438.253,45		R1
Sweden/2020	Y46		191210	combustible waste (RDF)		422.319,13		R1, R13
United Kingdom/2020	Y46		191210	Solid recovered fuel (SRF)	H4.1	57.903,18		R1
Cyprus/2020		Y	191210	RDF/Solid Recovered Fuel	H12	90.303,31		R1
United Kingdom/2020	Y46		191210	Refuse derived fuel (RDF)	H_	117.167,74		R1, R13
Other/2020	Y46		191210	Refuse derived fuel (RDF)	H_	164.594,46		R1, R13
United Kingdom/2020				total export		1.539.739,74		
All countries/2020				total import		1.538.256,07		

(c) Export of POPs wastes in 2020 and 2021

45. POP wastes and wastes containing POPs have been discussed for some time within the framework of the Basel Convention and a full set of guidelines has been developed. The identification of POP wastes or wastes containing POPs is difficult. Wastes containing PCBs, PCTs, PCNs or PBBs have been appropriately classified with the waste code A3180, and wastes containing PCDD/PCDF with A4110. However, there is no special code for other POP wastes, therefore A4140 is partly used as an alternative in the reporting. When reviewing the movements of A4110 it is evident that this entry is mainly used to classify filter dust or contaminated soil.

46. The majority of the exported waste that could be identified as containing POPs were so based on the Basel Convention codes mentioned above, EWL-codes or the waste description. Most POPs wastes moved transboundary are waste containing or contaminated with PCBs; or the level of contamination is not clearly mentioned. In rare cases, other POPs are mentioned in the waste description as table 13 shows.

Table 13: Reported exports of POP wastes in the years 2020 and 2021

Exp. Country/ Imp. Country	Basel Code	Y code	National code	Type of waste	Amount (t)
NZ / FR	A4140	Y45		PFAS Fire Fighting and Industrial PFAS containing chemicals	120,04
UK / CA		Y27	160215*	Printed Circuit Boards may contain POPs & antimony trioxide	134,78
UK / BE		Y27	160215*	Printed circuit boards, electronic components, wiring containing POPs	583,55
UK / CA		Y27, Y31	160215*, 190204*, 191211*	Small mixed WEEE containing POPs-PBDEs above the MCL concentrations	119,31
NZ / AU	A4140	Y45		PFAS containing fire-fighting foam wastes - liquids and solids	57,90
NZ / FR	A4140	Y45		PFAS containing fire-fighting foam wastes - liquids and solids	88,72

Exp. Country/ Imp. Country	Basel Code	Y code	National code	Type of waste	Amount (t)
UK / DE	Y48		191212	Plastic and Rubber, containing Brominated Diphenyl Ethers	1020,34
NZ / AU	A4140	Y45	A4140	foam fire foam waste streams containing PFAS	100,00
CH / AT		Y45	17 05 05*	PFOS contaminated waste	28.925,96

(d) Export of used lead acid batteries (Y31) in the year 2020

47. Based on the information in the annual reports, the export of lead batteries is consistently a major waste stream subject to TBMs. Based on reports for 2020, the reporting on Y31 suffers from major importers not reporting or not reporting detailed data. Concerning reported data, the amounts imported by Poland and Bulgaria in 2021 do not sum up to the reported exports by Australia; Spain reports a higher amount of imported wastes than that reported by France as export; and the United Kingdom reported a lower amount of imported wastes than that reported by France as export.

Table 14: Export and related import of used lead acid batteries (Y31) in the year 2020

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
United Arab Emir.	A1160	Y31		Used Lead Acid Battery	H11	144.640,00		
Republic of Korea, India, Iran	The Republic of Korea and India did not report any details on imports in 2020 Iran did not report in 2020							
Australia	A1160	Y31	A1160	Lead Waste derived from Used Lead Acid Batteries	H11, H12	21.200,00		
Republic of Korea	The Republic of Korea did not report in 2020/21.							
Australia	A1020	Y31	191211	Lead Waste derived from Used Lead Acid Batteries	H11, H12	18.000,00		R4
Poland	A1020	Y31	191211*		H11, H12	3.738,74		R4
Australia	A1020	Y31	060405	Lead Waste derived from Used Lead Acid Batteries	H11, H12	10.000,00		R4
Bulgaria	A1020	Y31	060405*	Lead waste and scrap	H12	3.579,84		R4
Australia	A1020	Y31	A1020	Lead Waste derived from Used Lead Acid Batteries	H11, H12	12.000,00		
Spain								
Australia	A1020	Y31	A1020	Lead Waste derived from Used Lead Acid Batteries	H11, H12	18.000,00		R4
Philippines	A1180	Y31	M506	WEEE		7.000,00		R4
France	A1160	Y31	160601*		H8	22.589,48		R4
Spain	A1160	Y31	160601	Acumuladors de plom		26.626,23		
France	A1160	Y31	160601*		H8	4.533,15		R4
United Kingdom	A1160	Y31	160601*	Lead Acid Batteries	H8	3.731,07		

(e) Export and related import of mixed plastic wastes (Y48) in the year 2021

48. The classification of plastic waste was fundamentally changed with the adoption of the plastic wastes amendments by the fourteenth meeting of the Conference of the Parties in 2019. New entries were listed in Annex II, VIII and IX, regarding plastic waste (Y48, A3210 and B3011). It therefore made sense to analyse the exports and imports of Y48 reported for the first time in 2021. Y48 has specific exclusions, so, plastic wastes that is hazardous (A3210) or be excluded from the scope of the Convention (those plastic wastes provided destined for recycling, almost free of contamination etc.).

49. Most of the TBMs of Y48 reported in the year 2021 were intra-EU movements. Four exports out of the EU are reported. Bulgaria reported one export to Serbia; the Netherlands reported one export to Canada; the United Kingdom reported one export to Norway; and Belgium reported one export to Democratic People's Republic of Korea. Only two countries outside the EU reported exports of Y48 in the year 2021. Japan reported one export of Y48 to the Philippines and Costa Rica reported two

exports to Nicaragua. The total amount of Y48 exported in 2021 was 135.481,42 t and the total amount imported was 207.908,59 t. Table 15 compares the amounts reported as exported and imported, showing the instances in which the country of export did not report the movement and the instances in which there are discrepancies in the reported amounts.

Table 15: Export and related imports of plastic waste (Y48) in the year 2021

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Austria	Y48		19 12 04	plastic waste		2.835,64		R1
Switzerland	Switzerland did not report the import of Y48 from Austria							
Austria	Y48		19 12 04	plastic waste		6.633,58		R12
Czechia	Czech Republic did not report the import of Y48 from Austria							
Austria	Y48		19 12 04	plastic waste		10.304,53		
Germany	Y48		191204/EU48			1.306,20		R1
Austria	Y48		19 12 04	PVC		5.045,98		
Italy	Italy did not report the import of Y48 from Austria							
Austria	Y48		15 01 06	packaging waste		9.161,37		R12
Slovenia	Slovenia did not report the import of Y48 from Austria							
Belgium	Y48		191204			1.823,33		R3
United Kingdom	Y48		191204	PVC		2.658,52		R3
Belgium	Y48		070213			578,20		R3
Democratic People's Republic of Korea	Democratic People's Republic of Korea did not report in 2021							
Belgium	Y48		191204			381,87		R3
Austria	Y48		191204			381,39		
Bulgaria	Y48		150102	plastic waste		601,10		R3
Serbia	Serbia did not report the import of Y48 from Bulgaria							
Costa Rica	Y48		170203	Polyvinyl Chloride scrap	H13	96,00		R3
Nicaragua	Nicaragua did not report in 2021							
France	Y48		191204			5.279,47		R3
Austria	Y48		191204			4.984,52		R3
France	Y48		191204			2.599,00		R3, R12
Spain	Spain did not report the import of Y48 from France							
France	Y48		191212			343,00		R3, R12
Netherlands	The Netherlands did not report the import of Y48 from France							
France	Y48		191204			39,66		R3
United Kingdom	Y48		191204			643,70		
United Kingdom	Y48		191204		H_	1.818,10		R1
France	Y48		191204			1.769,46		
United Kingdom	Y48		191204	PVC		9.444,99		R3
Netherlands								
United Kingdom	Y48		191204			4.120,46		R3, R12
Belgium	Belgium did not report the import of Y48 from United Kingdom							
United Kingdom	Y48		170203 170407			73,50		R4, R5, R10

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Norway	Y48					69,90		R4
United Kingdom	Y48		190104/EU48	Plastic Regrind	H	1.584,20		R3
Austria						1.888,90		
United Kingdom	Y48		191204			6.523,39		R3
Germany	Y48					3.917,71		
United Kingdom	Y48		191204	PU Powder	H	2.819,52		R1
Cyprus	Cyprus did not report the import of Y48 from United Kingdom							
Germany	Y48		191204/EU48			9.887,87		R3
Austria	Y48					18.365,06		
Germany	Y48		191204/ EU48			88,20		R12
Czechia	Czechia did not report the import of Y48 from Germany							
Germany	Y48		191204/ EU48			2.586,74		R3
United Kingdom	Y48					1.930,51		
Germany	Y48		191204/ EU48			2.519,41		R3
Netherlands	Y48		191204			413,32		R1
Germany	Y48		191204 / EU48			17.930,41		R3
Portugal	Portugal did not report the import of Y48 from Germany							
Germany	Y48		191204 / EU48			1.874,27		R12
Belgium	Belgium did not report the import of Y48 from Germany							
Germany	Y48		191204 / EU48			4.117,56		R12
Switzerland	Switzerland did not report the import of Y48 from Germany							
Germany	Y48		191204 / EU48			1.711,45		R3
France	France did not report the import of Y48 from Germany							
Hungary	Y48		191204	plastic and rubber		130,58		R3
Slovakia	Slovakia did not report the import of Y48 from Hungary							
Iceland		Y48	150102	plastics from households	H4.1	2.002,00		R3
Sweden	Y48		150102			1.819,44		R3
Ireland	Y48		15 01 02			5.871,35		R3
United Kingdom						663,66		
Japan	Y48			PC and ABS Plastic Scrap		2.550,00		R3
Philippines	The Philippines did not report the import of Y48 from Japan							
Netherlands		Y48	191204	Other	H	3.726,54		R3
Austria	Y48		191204			250,876		R3
Netherlands		Y48	191204	Other	H	208,60		R5
Canada	Canada did not report detailed data							
Netherlands		Y48	191204	Other	H	650,86		R3
Germany	Y48		191204			477,42		
Netherlands		Y48	191204	Other	H	100,00		R3
Estonia	Y48		191204			493,86		R3
Netherlands		Y48	191204	Other	H	5.841,30		R3
United Kingdom	Y48		191204			14.133,69		R3

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Norway	Y48		9913	150110		451,62		R1
Sweden	Sweden did not report the import of Y48 from Norway							
Norway	Y48		1752	191204		810,14		R3
United Kingdom	Y48		191204			819,04		R3
Total amount exported reported in 2021						135.481,42		
Total amount imported reported in 2021						207.908,59		

(f) Export and related import of asbestos (Y36) reported in the year 2021

50. Exports of asbestos waste (Y36) appear in the top ten for the first time in 2021. This waste stream was therefore analysed more closely. The vast majority of Parties that reported exports of asbestos in 2021 are WEOG-countries. The exceptions are the State of Palestine and Montenegro. Intra-WEOG movements also dominate on the import side. The exceptions are South Africa, who reports an import from Botswana (although Botswana reports no exports) and Uzbekistan, who reports imports from Russia, Kazakhstan and China for a total amount of 5.323,8 t. However, the latter do not report exports to Uzbekistan.

51. In the year 2021, a total of 359.161,37 t of asbestos waste was reported as exported, while a total of 309.249,32 t of asbestos waste was reported as imported. The main exporter is Italy with an reported export of 243.276,86 t of asbestos waste in 2021. The main importer is Germany with a reported import of 179.017,29 t of asbestos waste in 2021.

Table 16: Export and related import of asbestos (Y36) reported in the year 2021

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Andorra	A2050	Y36	160111*, 170601*, 170605*	Asbests	H11	35,90	D5	
Spain	A2050	Y36	170601*, 170605*	Materiales que contienen amianto	H11	31,55	D5	
Austria	A4130	Y36	150111*	acetylene cylinders	H11	188,24		R4
Germany	A4130	Y36	150111		H11	188,43		
Belgium		Y36	170503			8.687,37	D9	
Netherlands		Y36	170503	Other	H	8.716,55		
France	A2030	Y36	160807*		H11	144,4		R4, R8
Italy	A2030	Y36	160807*			144,32		R4
France	A2050	Y36	170605*		H10	60.401,04	D5	
Belgium	A2050	Y36	170605			26.387,20	D5	
Germany	A2050	Y36	170605		H11	2.110,06	D5	
France	A2050	Y36	170605*		H11	2.687,32	D5	
Greece	A2050	Y36	170605*	construction and insulation materials cont. asbestos	H11	513,75	D1	
Spain	A2050	Y36	170601*	amiant		516,02	D5	
Greece		Y36	170601*	asbestos wastes		260,89	D1	
Germany	A2050	Y36	170601		H11	569,52	D1	
Greece	A2050	Y36	160111*, 170601*, 170605*	construction and insulation materials containing asbestos and asbestos brake pads	H12	1.985,86	D1	
Sweden	A2050	Y36	170601*, 170605*	construction and insulation materials cont.asbestos	H11	697,76	D1	

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
Greece	A2050	Y36	170605*	safety boxes cont. asbestos	H11	152,93	D1	
Norway	A2050	Y36		170605		1.132,40	D1	
Ireland	A2050	Y36	170605*	Construction and demolition waste containing asbestos		5.148,15	D1	
Sweden	A2050	Y36	170605*	construction materials containing asbestos	H11	7.096,00	D1	
Ireland	A2050	Y36	170601*	soil with trace levels of Asbestos Fibres		816,99	D5	
United Kingdom	No import of Y36 from Ireland reported in the year 2021							
Italy	A2050	Y36				8.833,62	D5	
Spain	A2050	Y36	170605*	Residus que cont. amiant		8.728,18		
Italy	A2050	Y36	170503*			218.884,54	D1	
Germany		Y36				174.707,44		
Italy	A2050	Y36	170507*			10.470,76	D5	
Norway	A2050	Y36		170507		8.193,57	D5	
Italy	A2050	Y36	170605*			4.457,80	D1	
Sweden	A2050	Y36	170601*	insulation materials containing asbestos		4.341,38	D1	
Italy	A2050	Y36	170605*			630,14	D1	
France	A2050	Y36	170605*		H11	629,56	D1	
Luxembourg		Y36	170603	autres matériaux d'isolation à base de ou contenant des substances dangereuses		2.709,00	D1	
Germany	A2050	Y36	170605		H11	408,58		
Luxembourg	A2050	Y36	170605	matériaux de construction contenant de l'amiant	H12	3.639,00	D1	
France	A2050	Y36	170605*		H11, H12	2.615,45	D1	
Luxembourg	A2050	Y36	170601	matériaux d'isolation contenant de l'amiant		25.574,00	D14	
Belgium	A2050	Y36	170601			23.846,91	D14	
Montenegro	A2050	Y36	170605*	construction materials containing asbestos	H11	150,00	D1	
Germany	A2050	Y36	170605		H11	23,68	D1	
Netherlands		Y36	160104			11,15		R4
Türkiye	Türkiye did not report imports in 2021							
Netherlands	A4130	Y36	150111			199,93		R4
Germany	A4130	Y36	150111		H11	176,93		R4
Spain	A4130	Y36	150111*	Envasos metal·lics, que contenen una matriu sòlida i porosa perillosa		173,95		
Germany	A4130	Y36	150111		H11	173,14		R4
State of Palestine	A2050	Y36	_02-01-122	asbestos sheets	H11	30,00	D5	
Israel	Israel did not report import of Y36 from State of Palestine							
Switzerland		Y36			H6.1	90,99	D12	
Germany	A2050	Y36	170605		H11	106,21	D12	

Exporting Country/year	Basel Code	Y code	National code	Type of waste	H Code	Amount (t)	D code	R code
Importing Country/year								
GB	A2050	Y36	170605*	Construction Materials containing asbestos	H11	53,49	D5	
Spain	A2050	Y36	170605*	Materiales de construcción	H11	25,36	D14	
United Kingdom	A4130	Y36	150111*	Waste packages and containers	H11	190,90		R4
Germany	A4130	Y36	150111		H11	465,00		R4
Total amount exported reported in 2021						359.161,37		
Total amount imported reported in 2021						309.249,32		

E. Discrepancies in the classification of waste

1. Discrepancies in the use of A, B and Y codes²¹

52. A number of problems have been identified in the application of the Basel Convention codes. The Y codes Y1 to Y18 predominantly describe origin-related waste streams, whereby the Y codes Y3, Y8, Y9, Y10 and Y15 are describe waste streams in terms of substances. The second group of Y codes (Y19 to Y45), on the other hand, describes waste constituents.

53. This approach differs from the categories of generally substance-related waste streams categorised by:

- (a) A codes from Annex VIII;
- (b) B codes from Annex IX;
- (c) Y codes from Annex II: Y46, Y47, Y48 and Y49.²²

54. When analysing the export and import data, it is noticeable that several Y codes are sometimes used together, especially to describe the constituents of the waste stream. Similarly, several A and B codes are used to classify waste that is not listed with a specific code in Annex VIII, IX or II. The use of multiple A, B and Y codes, which may be the result of challenges in classifying wastes, is illustrated in table 17.

Table 17: Examples of waste classification using multiple Basel Convention codes

Annex II, VIII or IX code	Y code	National code	Type of waste	H characteristic
End of life vehicles (ships, vessels)				
A1030, A1180, A2050, A4060, A4070, A4090	Y9, Y29, Y31, Y45		Waste end-of-life vehicle: Drillship	H3, H5.1, H6.1, H11
E waste				
A1020, A1180, B1090, B1100	Y20, Y27, Y31, Y45		Mixed e-waste	H11, H12, H13
A1180, B1110	Y20, Y22, Y23, Y24, Y27, Y28, Y29 Y30, Y31	200135*	Electronic components from the waste of computer parts	H12
Y46		160213*	WEEE	HP15
Contaminated soil				
A1040, A1020	Y19, Y31, Y21	170503*	Contaminated soils	H12
A1020	Y31, Y25, Y26, Y28, Y20	170503*	Contaminated soils	H12
A1030	Y29, Y43, Y44	170503*	Soil and stones containing dangerous substances	H11, H12
Wood waste				
	Y18	191206, 170204, 200137	AC170	H4.1
	Y18	191206, 200137	AC170	
	Y18	191206	Wood waste treated with wood preservatives	H11

²¹ To simplify the text, the term “codes” is used in a generic sense to encompass the codes in Annex VIII (list of A codes), in Annex IX (list of B codes) and in Annex I (Y entries).

²² From 1 January 2025 onwards.

Annex II, VIII or IX code	Y code	National code	Type of waste	H characteristic
	Y18	190204	Mixed haz. waste	H6.1
	Y18	190304	Mixed haz. waste	H6.1
Refuse derived fuel (RDF)				
	Y	191210	RDF/Solid Recovered Fuel	H12
Y46		191210	Solid recovered fuel (SRF)	H
Y46		191210	Combustible waste (RDF)	
Y46		191210	Refuse derived fuel (RDF)	NA
		191210	Combustible waste	H4.1
		191210	1/1b	H4.1
Salt slags				
	Y18	100308*	Salt slags from secondary production	
		100308*	Salt slag	H4.3
A4140	Y18	100308*	Salt slag from aluminium industry	H8 H10
	Y32	100308, 100309, 100315, 101099, 100399	Salt slags and drosses containing aluminium	
Lithium-batteries				
A1170	Y	160121	Li-Ion batteries	
A1180	Y15, Y34, Y35	A1180	Lithium metal batteries in electrical equipment	H8, H10, H12
A1170	Y42	160121*	Li-batteries	H12
A1170	Y26		Li-ion Li Polymer and NiMH batteries	H12
Chlorofluorocarbons				
	Y45	160213*, 200123	Used refrigerators, may include CFC	
	Y41	140601*	Chlorofluorocarbons, HCFC, HFC	H3
		140601*	Chlorofluorocarbons, HCFC, HFC	H12
	Y	140601, AC150	CFCs	
		AD220	Recovered Refrigerant	H11, H12
Shredder residues				
A3120	Y18	191003*	Shredding residues	H13
	Y18	191005	Shredder residues	H12
	Y27	191211*	Shredded wire cable, circuit boards, may contain POPs	

55. While the use of multiple codes is understandable when using the Y codes Y19 to Y45 which describe constituents, the listing of various Basel Convention codes of Annex VIII, as in the case of ships (see table 21), is not helpful as these codes describe completely different materials. While the A codes from Annex VIII describe specific waste streams, the constituents Y 19 to Y45 describe contents that may be present in various different waste streams, but do not describe a specific waste stream. The waste streams Y1 to Y18, on the other hand, describe both specific waste streams (e.g. Y9) and the waste origin (e.g. Y1) and are therefore unsystematic assorted. While the allocation of Y 9 in the example of ships (see Table 21) makes perfect sense, the allocation of A3020 makes no sense, as A3020 describes the pure waste oil flow.

56. Furthermore, sometimes different Y codes are used by the exporting and importing countries, as illustrated in table 18.

Table 18: Different Y or no Y codes used

Exporting Country/year	Annex II, VIII or IX code	Y code	National code	Type of waste	H characteristic	Amount (t)	D operation	R operation
Italy/2020	A3130	Y37	060502*; 160303*; 160305*			12,54	D10	
Germany/2020		Y18	060502	Industrial sewage sludge	H12	12,31	D10	
Switzerland/2020			170409	Metal waste contaminated with dang. substances	H_	48,08		R4
Germany/2020	A1010	Y31	170409		H12	48,04		R4

57. In 2021, the multiple use of Y codes increased sharply, resulting in the third largest amount of waste being moved across borders. This is often the case with laboratory waste or outdated and discarded chemicals where a large number of Y codes are often used in addition to the applicable codes A4150 and A4140. Although the intention of Parties may be to provide greater details about the wastes with a view to ensuring their environmentally sound management, the benefits of this approach is unclear in instances where there are specific A codes that accurately describe the wastes. Examples of use of multiple Y codes are provided in table 19.

Table 19: Examples of multiple use of Y codes

Annex VIII or IX code	Y codes
A4140	Y20, Y21, Y22, Y23, Y24, Y25, Y26, Y27, Y28, Y30, Y31, Y32, Y34, Y35, Y37, Y38, Y39, Y40, Y41, Y42, Y45
A4150	Y21, Y22, Y23, Y24, Y25, Y26, Y27, Y28, Y30, Y31, Y32, Y33, Y34, Y35, Y37, Y38, Y39, Y40, Y41, Y42
A3050	Y13, Y18, Y2, Y39, Y40, Y41, Y42, Y6, Y8, Y9
A4140	Y2, Y4; Y5; Y6; Y12; Y13, Y14, Y16, Y17, Y18, Y19, Y20, Y21, Y22, Y23, Y24, Y25, Y26, Y27, Y28, Y29, Y30, Y31, Y32, Y33, Y34, Y35, Y37, Y38, Y39 Y40, Y41, Y42, Y45
	Y2, Y4, Y6, Y9, Y11, Y12, Y13, Y18, Y42
A3170	Y41, Y3, Y14, Y7, Y11, Y10

58. Another challenge is the apparent inconsistent use of waste codes in Annexes VIII, IX, I and II of the Basel Convention, which is sometimes further exacerbated by the use of national codes. Some examples are listed and commented in table 20.

Table 20: Inconsistent combination of waste codes

Annex VIII or IX code	Y code	National code	Type of waste	H character istic
A1180	Y46		160213; 160214	H12
A3170	Y46	070207		
A4100	Y47	190107		
A4100	Y47	190113		
A1180	Y46		160213	
Comment: According to the national codes, all the wastes mentioned here are neither "wastes collected from households" nor "residues arising from the incineration of household wastes". The specification of the Y codes Y46 and Y47 is therefore not used correctly.				
A4020	Y10, Y21, Y22, Y23, Y28, Y29, Y31, Y37, Y8, Y9	020102; 020103, 020199, 030101, 040209, 070104*, 130109*, 130110*, 130111*, 130208*, 130507*, 130701*, 130703*, 130899*, 150103, 160120, 160211*, 160215*, 160216, 160505, 160708*, 160709*, 170201, 170202, 170203, 170401, 170402, 170404, 170405, 170407, 170409*, 170411, 170603*, 170604, 170904, 191204, 200121*, 200138	Metal and metal-alloy wastes in metallic non-dispersable form: Precious metals, Fe, Cu, Ni, Al, Zn, Ti, Tu, Mo, Ta, Mg, Co, Bi, Zr, Mn, Ge, V, Scrap of Hf In Ni, Rh, and Ga, Th, Rare earths scrap, Cr	
Comment: According to the specification of A4020, it should be clinical waste. However, the specified Y codes and national codes describe metal waste.				
A1020		170503*	soil and stones containing dangerous substances	
Comment: The waste is not metal waste but soil and stones containing hazardous substances. Instead of A1020, the constituents could have been entered in the Y codes column, e.g. Y20, Y24, Y26, ..., leaving the Annex VIII or IX column free.				
	Y_	120104, 120114	Powder and sludge containing dangerous substances	
Comment: According to the national codes, classification as Y9 and A4060 would have been possible				

Annex VIII or IX code	Y code	National code	Type of waste	H characteristic
Y46		160106, 160117, 170405, 170407, 170411, 191202, 200140	cables, containing neither liquids nor other hazardous components, ferrous metal, ferrous metal, iron and steel, metals, mixed metals	
Comment: As the waste is not waste from households according to the national codes and the waste description, Y46 should not be specified				
	Y_		Spent Bleaching Earth (SBE)	H_
Comment: Since the waste is a waste from industrial waste operations, specifying Y18 would have made sense				
AA010		100911*	Slag from induction furnaces (Iron Oxide)	H11
AB120	Y32	100321*	Carbon dust	H11, H12
Comment: OECD codes were used to classify the two waste streams. However, OECD codes should not be entered as Annex VIII or IX codes but as national codes column. As no specific Y code is available, but an H characteristic was assigned, these are Article 1 (1)b wastes.				
A1160	Y31	A1160	Lead Waste derived from Used Lead Acid Batteries	H11, H12
A1020	Y31	A1020	Lead Waste derived from Used Lead Acid Batteries	H11, H12
Comment: Different A-codes were used for these two waste streams, which are the same waste according to the waste description. In both cases, A1160 would have been correct and should be used in general for ULABs.				
		100304*	Aluminum skim and dross	H4.3
Comment: According to the waste description, this could be non-hazardous waste that could be assigned to code B1100. However, according to the national code and the H characteristic, this is hazardous waste that could be categorised as 1 (1) b waste, which could be indicated by entering 1/1b in the column for the Y code				
B1050, Y47		191203		H_
Comment: According to the EWL code and B1050 this is non ferrous metal, but not Y47 which may be the source of the metal by processing Y47				
A3050, Y46	Y13	080409*, 080411*, 080413*, 080415*, 160305*, 200127*	Wastes from production, formulation and use of resins, latex, plasticisers, glues/adhesives excluding such wastes specified on list B (note the related entry on list B, B4020)	H11, H12, H3, H4.1, H6.1
Comment: According to A3050 and Y13 this are wastes from the production of resins, latex, plasticisers and glues/adhesives which excludes y46				
Y48		170203	Polyvinyl Chloride scrap	H13
Comment: This classification is contradictory because Y48 supposed to be other waste, but its classified H13. If it is hazardous the entry A3210 should be used. PVC may fall under Y45 if H13. Or depending on the constituent may have others Y codes from Annex I.				

2. Waste ships

59. During the review of the TBMs, it became clear that Parties have different approaches with respect to reporting TBMs and classifying waste ships. Several exports of waste vessels or platforms destined for recycling in Türkiye or India were reported. However, Türkiye reported that no import of hazardous wastes took place in 2020 and 2021, while India did not report detailed data. The export of one waste ship destined for recycling in Belgium is not reported as import in 2020/21.

Table 21: Export of waste ships reported in 2020 and 2021

Exporting Country/year	Annex VIII or IX code	Y code	National code	Type of waste	H characteristic	Amount (t)	Transit Country	Importing Country	D operation	R operation
Trinidad and Tobago/2020	A1030, A1180, A2050, A4060, A4070, A4090	Y9, Y29, Y31, Y45		Waste end-of-life vehicle: Drillship "Discoverer Enterprise" (IMO No: 9186793)	H3, H5.1, H6.1, H11	34.135		TR	D5	R4, R12, R13
Malta/2020			160104	M.V. Seven Pelican (IMO No: 8420244)	H6.1	4.892		TR		R4
United Kingdom/2020		Y31, Y36, Y9	160104	End of life vessel 'Energy Annabelle' IMO No: 7721263	H12, H3, H5.1	8.477		TR		R4, R12
United Kingdom/2020		Y31, Y36, Y8, Y9	160104	Vessel	H3, H4.1, H5.1, H8	1.385	NL	BE		R4, R12
Greece/2020			160104	end - of - life ship	H12, H13	58.515		TR		R12, R13, R4
United Kingdom/2020			160104	Drilling unit*)	H13	14.282		TR		R4, R12, R13
United Kingdom/2020			160104	Drilling unit*)	H13	14.890		TR		R4, R12, R13
United Kingdom/2020			160104	Drilling unit*)	H13	13.137		TR		R4, R12, R13
Australia/2021	A1020, A1030, A1040, A1160, A2050, A3020, A4060	Y8, Y9, Y21, Y29, Y31, Y36	160104	End-of-life vessel	H3, H6.1, H8, H11	16.079		TR		R4, R12
Singapore/2021	A1020, A1030, A2050	Y26, Y29, Y31, Y36		Obsolete vessel containing haz. wastes	H5.1, H6.1, H11	47.887		IN		R4, R12, R13
United Arab Emirates/2012	A1020, A2050	Y31, Y36, Y45		Offshore Drilling Unit "Galveston Key" (IMO No: 8751241)	H5.1, H6.1, H11	9.381		IN		R4, R12, R13
United Arab Emirates/2012	A1160, A1180, A4060	Y9, Y29, Y31		Furgo Adventurer (Vessel)		1.430	EG	TR		R12, R4

*) No further information from the reports can be taken to classify these units in more detail

60. Trinidad and Tobago uses the term "Waste end-of-life vehicle" which exactly describes the waste, but there is no appropriate waste code available in Annex VIII of the Basel Convention. For the export of an Ultra-Deepwater Drillship, this Party uses several A and Y codes to identify the different hazardous wastes present in the ship. Annex IX of the Basel convention contains the waste code "B1250 Waste end-of-life motor vehicles, containing neither liquids nor other hazardous components", which only covers motor cars. This entry has no corresponding hazardous wastes entry in Annex VIII and is not covering vehicles other than cars.

61. Malta uses the Code 160104* of the EWL to classify the end-of-life ship exported to Türkiye.

62. Australia uses the term "end-of-life vessel" which exactly describes the waste, but, as mentioned above, there is no appropriate waste code available in Annex VIII of the Basel Convention. For the export of an end-of-life vessel, Australia uses several A and Y codes to identify the different hazardous wastes present in the vessel and, in addition, the waste code of the European Union.²³

²³ 16 01 04* end-of-life vehicles, which covers end-of-life vehicles from different means of transport (including off-road machinery).

3. Use of incomplete or no specific codes

63. As can also be seen from the examples of the analysed waste streams, the formulations “Y_”, “H_”, “R_” and “D_” are sometimes used. These formulations, which may in part be explained by difficulties in classifying wastes, are not consistent with the Basel Convention nor the instructions for completing the notification and movement documents.²⁴ In the event the exporter and importer involved in a notification have not entered corresponding codes at the time of the initiation of the prior informed consent procedure and this is not subsequently addressed at the time of the preparation of the national report, tables 4 and 5 of the national report are consequently incomplete.

III. Draft recommendations to improve national reporting

64. This chapter draws on the information and findings set out above. It sets out draft recommendations to improve national reporting for the consideration of the Committee and for consultation with the Open-Ended Working Group at its fourteenth meeting. These recommendations are intended to improve national reporting by addressing accounting issues.

65. The review of the information reported in tables 4 and 5 however identifies others areas where work may be needed, namely in relation to the classification of wastes and the use of corresponding codes, and a review of existing wastes entries, which could lead to improved reporting. This further work, as summarized below, does not necessarily fit within the current mandate of the Committee. It is however recommended that the findings and possible way forward be brought to the attention of the Conference of the Parties for consideration.

A. Guidance on accounting

66. As illustrated in this report, reporting by the Parties, especially concerning the amounts of wastes subject to TBMs, does not always follow standardised approaches. The Manual for completing the format for national reporting under the Basel Convention (hereinafter “the manual”)²⁵ is the main guidance document to support Parties with the transmission of accurate and complete national reports. The manual however, does not provide detailed instructions on pages 31 et seq. regarding the completion of tables 4 and 5. Moreover, the Draft user manual for the electronic reporting system of the Basel Convention (hereinafter “draft user manual”)²⁶ provides an overview of the key features of the electronic reporting system and explains the various ways in which users can submit information through the system. Box 1 of the user manual presents the validation rules for filling in Tables 4 and 5 of the online questionnaire.

67. Neither document provides detailed guidance on reporting the amounts of wastes subject to TBM, in particular on how to deal with notifications where transports take place around the turn of the year. Furthermore, no guidance is provided as to whether only one notification with the associated TBMs should be totalled or whether individual TBMs can also be reported.

68. In order to avoid discrepancies in data reported, it is recommended that the basis for reporting should be the notification with its corresponding movement document, as defined by the unique notification number in box 3 of the notification document and box 1 of the movement document. This approach, if accepted, would require the ERS to be adjusted. Since the report must be submitted annually, it is also logical that only the total quantity of waste shipped in the reporting year on the basis of a notification should be reported. This means that in the case of notifications where waste shipments take place around the turn of the year, the quantity shipped in each of the two years concerned should be reported. In order to avoid discrepancies between export and import, the annual quantity reported as exported should normally be the quantity for which the import country reported the arrival of the waste in the year in question. In the event there are still discrepancies in amounts exported and imported, this may be due to losses due to evaporation that are beyond what may reasonably be expected, for instance due to lack of adequate packaging. Discrepancies may also be the outcome of other incidences (such as theft and accidents not reported) that merit investigation. It is therefore recommended that concerned Parties cooperate with a view to resolving such discrepancies.

²⁴ Available at: <https://www.basel.int/Procedures/NotificationMovementDocuments/tabid/1327/Default.aspx>.

²⁵ Available at: <https://www.basel.int/Countries/NationalReporting/Formatandmanualsfornationalreporting/tabid/8754/Default.aspx>.

²⁶ Available at: <https://www.basel.int/Countries/NationalReporting/Formatandmanualsfornationalreporting/tabid/8754/Default.aspx>.

69. The manual for completing the format for national reporting states the following on pages 35 and 36:

Amount exported/Amount imported

In column 6, provide a total amount exported/imported for each waste code or type of waste for the same hazardous characteristics if applicable, the country of import/country of origin, the same country/countries of transit if applicable and the same D/R code.

70. The following sentences could be added:

The amount shall be reported for each individual notification characterised by its unique notification number. In the case of a general notification movement with several movements, the individual movements reported in the movement documents by the importing country for the respective reporting year have to be summarized, based on the date of arrival at the facility.

71. Consequential adjustments to the draft user manual and improvements to the ERS may need to be made.

B. Possible areas of further work

1. Guidance on the use of waste codes

72. Assigning multiple A-codes may result from a misunderstanding of those codes. Unlike Y19 to Y45 where constituents characterise the waste, the A codes describe specific waste streams in relation to substances. Accordingly, while it makes sense to specify the Y codes for the waste-determining constituents, the use of A-codes for metals and metal compounds for contaminated soil, for example, is unclear. This is a waste stream for which no A-code is currently available, i.e. this waste stream should only be assigned a national code.²⁷

73. A more common understanding of how to apply Y codes would therefore be helpful for improving national reporting. It could accordingly be recommended that:

(a) The use of codes from Y1 - Y45 indicates that the waste is considered hazardous (Art. 1 (1) a of the Basel Convention);

(b) If the waste is classified using a Y46, Y47 or Y48 code, the waste is considered as other wastes (Article 1 (2) and Annex II of the Basel Convention).

74. An inconsistency arises when a Party uses a Y46, Y47 or Y48 code, while at the same time using A-codes and H-characteristics. In the event a Party classifies the waste as hazardous, it would be more correct to use one of the Annex I Y codes (Y1-Y45) if the waste is hazardous according to Article 1 (1) a of the Basel Convention. For example, instead of using Y47 for hazardous residues arising from the incineration of household wastes, it would be more correct to use the Y18 code.

75. If the waste is classified as Article 1 (1) b then no Y code should be entered and the national code entered in column 3, a description in column 4 and the appropriate H-characteristics in column 5 of tables 4 and 5.

76. The manual for completing the format for national reporting, the draft user manual as well as the instructions for completing the notification and movement documents²⁸ may benefit from consequential adjustments.

2. Review of waste lists

77. A review of the waste lists falls outside the scope of the mandate of the Committee. However, challenges in classifying waste and assigning codes has an direct impact on national reporting. The findings of the present report could be brought to the attention of the Conference of the Parties and, as relevant, to the expert working group on the review of Annexes for its further consideration.

78. With the exception of the two amendments pertaining to "mixed plastic waste" and "waste electrical and electronic equipment", and while bearing in mind that Annexes I and III are currently

²⁷ For instance 170503 in the EWL for European Union member States.

²⁸ Available at: <https://www.basel.int/Procedures/NotificationMovementDocuments/tabid/1327/Default.aspx>.

under review,²⁹ the waste lists of the Basel Convention have not been revised and supplemented for years. In the course of the preparation of this report, some waste streams were identified for which the Parties appear to have different approaches in classifying them in Annexes VIII, IX or II because of lack of a corresponding entry, either because the wording is too narrow or because there is no suitable waste code.

79. Consideration could be given to:

- (a) Reviewing B1250 on Annex IX for end-of-life motor vehicles, and whether there would be benefits in having a mirror entry in Annex VIII;
- (b) Reviewing the entry B1090 on batteries and whether there would be benefits in adding metals in the waste description;
- (c) Reviewing whether sub-entry "Aluminium skimmings (or skims) excluding salt slag" in entry B1110 would benefit from a mirror entry in the A List;
- (d) Reviewing whether there may be benefits in adding a new waste code for refuse derived fuel (RDF);
- (e) Reviewing whether there may be benefits in completing entry Y45 with a specific entry on the A List to cover chlorofluorocarbons, hydrofluorocarbons and other ozone depleting substances;
- (f) Reviewing whether there may be benefits in having a specific entry in Annex I or VIII capturing in a dynamic way the persistent organic pollutants (POPs) covered by the Stockholm Convention;
- (g) Reviewing whether there may be benefits in having a specific entry for waste ships.

80. In addition during the preparation of this report, some waste streams have been identified as raising classification challenges, namely contaminated soils, swage sludge, treated wood, waste from flue gas cleaning, shredder residues, and mineral fibre waste exhibiting hazardous characteristics. Further work may be considered on how to address these challenges.

3. Introducing electronic approaches to the notification and movements documents

81. The introduction of an electronic system for the notification and movement documents has been under discussion in the framework of the Basel Convention as well as in some Parties, including in the EU, for some time now. For example, as part of the 2023 amendment to the European Waste Shipment Regulation (WSR), such a system is expected to be implemented in the EU Member States in the medium term.

82. In the framework of Basel Convention work on electronic approaches to the notification and movement documents was initiated by the Committee with a view to improve implementation of and compliance with Article 6 of the Basel Convention. A report³⁰ on this issue was prepared by the Secretariat to assist the Committee in its work. The topic was discussed further in the subsequent COPs and a number of decisions were adopted, by the sixteenth meeting of the Conference of the Parties.³¹

83. The planned introduction of an electronic system in the EU opens up new possibilities and opportunities that could be built upon with a view to improving national reporting and, in particular, addressing discrepancies in reporting, such as differences in quantities, transmission errors and differences in waste categorisation.

²⁹ See

<https://www.basel.int/Implementation/LegalMatters/LegalClarity/ReviewofAnnexes/AnnexesI,III,IVandrelatedaspects/tabid/6269/Default.aspx>. See also the Recommendations by the expert working group on the review of Annexes for possible amendment proposals to Annex I, including whether any additional constituents in relation to plastic waste should be added to Annex I, and findings of the expert working group on the consequential implications of the review of Annex I to the Convention (1 December 2023), set out in document UNEP/CHW/OEWG.14/INF/28.

³⁰ UNEP/CHW/CC.12/11/Add.2.

³¹ BC-16/10: Electronic approaches to the notification and movement documents. See also: <https://www.basel.int/Implementation/Controllingtransboundarymovements/approachesfornotificationandmovement/Overview/tabid/7375/Default.aspx>.

84. The work undertaken by the small intersessional working group on electronic approaches to the notification and movement documents may therefore also lead to improvements in national reporting.
