

Producer Responsibility: Examples of broadly equivalent standards for packaging and equivalent standards for WEEE and batteries

All evidence submitted to demonstrate broadly equivalent standards for packaging and equivalent standards for WEEE must:

- relate to the overseas reprocessing site that is included in the application
- have a valid date at the time of submission
- refer to the reprocessing activity and the conditions/standards that it needs to operate
- have an English translation and be accompanied by a photocopy of the original document and
- have an official stamp on the original document and reference to the competent authority, if it is an environmental licence.

If a renewal to a licence is provided, a copy of the original licence must also be supplied.

Where the activity is regulated by a licensing regime, a copy of the permit is required. ISO 14001 will only be accepted where a country does not regulate the overseas reprocessing site through a permitting regime. Any ISO14001 must be for the reprocessing site and refer to the reprocessing activity on the certificate.

A statement from the competent authority which shows that the reprocessing site is regulated and works within a system that meets broadly equivalent standards for packaging and equivalent standards for WEEE and batteries is acceptable.

Listed below are examples of documents that can be accepted as evidence. The list of evidence types is not a prescriptive list - these are just examples of the types previously received which have been agreed between the Agencies¹ to acceptably demonstrate broadly equivalence. If other documents are provided and they explain how reprocessing operations are regulated to protect the environment then these will be considered and may be accepted.

PLEASE NOTE: You need to check if an export is allowed under the Waste Shipment Regulations. Inclusion in the list below does not confirm that the export is allowed. You can check this using the waste exports tool at: <http://apps.environment-agency.gov.uk/waste-import-export/124357.aspx>

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Bangladesh	Packaging, batteries & WEEE	Regulated at country level	Permit from the People's Republic of Bangladesh	Must contain terms and conditions of operation.

¹ Environment Agency, Scottish Environment Protection Agency, Natural Resources Wales, and Northern Ireland Environment Agency

² The Producer Responsibility regime evidence is required for. Blue indicates all regimes and orange indicates WEEE and batteries.

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Brazil	Packaging, batteries & WEEE	Regulated at state level	Operating licence from Government State of 'xxxx', from Environmental Secretariat	'Certificate of Registration from Brazilian Army' / 'Certificate of Potentially Polluting Activities' are not valid alone. Must have operating licence.
China	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Import licence (MEP licence sometimes referred to as SEPA licence) <p>The copy provided must be clearly scanned, coloured with the water markings visible</p> <p>Where the above requirements are not met the following 2 documents will be required:</p> <ul style="list-style-type: none"> • Import licence (MEP licence sometimes referred to as SEPA licence) • Permit or inspection/environmental report 	<p>AQSIQ (General Administration of Quality Supervision, Inspection and Quarantine) will not be accepted as evidence as they do not relate to the reprocessor.</p> <p>Examples of documents that may be suitable for bullet point 3:</p> <ul style="list-style-type: none"> • Waste disposal certificate, or • Environmental report, (valid within 2 years) or • Inspection report (valid within 2 years), or • Waste emissions permit, or • Pollution discharge permit <ul style="list-style-type: none"> • If the documents do not mention the reprocessing activity, you may be asked for further information.
Egypt	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Hong Kong	Packaging, batteries & WEEE	Environmental Protection Department	<p>Either:</p> <ul style="list-style-type: none"> Local environmental permit, e.g. Water Pollution Control Ordinance, <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> ISO 14001 	
India	Packaging, batteries & WEEE	Regulated at state level	<ul style="list-style-type: none"> Either: Pollution Control Board (PCB) licence, or authorisation/ consent certificate, or Registration for the recycling of plastic waste (Plastic Waste (Management & Handling) Rules 2011 and amendment Rules 2011), or Import Licence if the activity is specified on the licence 	Extensions to PCB licences are not acceptable alone. The original licence must also be submitted.
Indonesia	Packaging, batteries & WEEE		<ul style="list-style-type: none"> Either: Letter from competent authority, or Permission/ Permit of Liquid Waste Disposal , or Emission Standard, or Import Licence (LIMBAH) 	<p>A LIMBAH (import) licence is required for TFS compliance. However, site environmental compliance issues are assessed as part of the application process to obtain an Import Licence issued by the Ministry of Trade in consultation with the Ministry of Environment). It is valid for one year.</p> <p>An 'Emission Standard' is issued by the Ministry of Environment Management, and covers emissions to air from a static source (no expiry date).</p> <p>A 'Discharge of Waste Water Standard' issued by local Govt Authority (no expiry date).</p>
Iran	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> Letter from competent authority, or Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> ISO 14001 certificate 	

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Japan	Batteries & WEEE	Department of Environment	Permit issued under the Waste Management and Public Cleansing Law 1970 (and amendments)	
Malaysia	Packaging, batteries & WEEE	Department of Environment	<ul style="list-style-type: none"> • Either: • Scheduled Waste Treatment and Disposal Facility from DoE, or • Environmental Impact Assessment from DoE with clear approval conditions, or • Written Approvals/Notifications (e.g. covering discharges to air, water) for site operations with regard to the Environmental Quality Act, 1974, issued by DoE, or • For <u>waste plastics</u>, an Approval Letter issued by the Department of Environment (local DoE State office) to 'carry out recycling activities', or an Approval Letter for the import of plastic waste issued by NSWD (National Solid Waste Department) 	<p>Warehouse Licence is not acceptable.</p> <p>Local import controls for plastics. PVC is no longer prohibited as it now falls under Article 18 controls.</p> <p>A Pre-Siting Evaluation document is not acceptable as it is a requirement for the planning stage rather than the operational stage.</p> <p>For <u>waste plastics</u>, a site may be in possession of the DoE Approval Letter if they had applied for an Import Licence; The NSWD Approval Letter specifies foreign 'suppliers', and therefore we would expect the UK exporter to be named in the NSWD.</p>
Mexico	Batteries & WEEE	Department of Environment and Natural Resources	Department of Environment and Natural Resources environmental permit or licence	
Morocco	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	
Nepal	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Pakistan	Packaging, batteries & WEEE	Regulated at state level. Pakistan have provincial environment protection agencies, all set up under The Pakistan Environmental Protection Act	<ul style="list-style-type: none"> • NOC (No Objection Certificate) for imports • and either • Letter from competent authority, or • NOC for reprocessing 	<p>The NOC for import is issued by the Climate Change Division in Islamabad</p> <p>A NOC for the reprocessing site is only acceptable if it relates to the manufacturing or reprocessing itself or for the import of the material for reprocessing at the site concerned.</p>
Philippines	Packaging, batteries & WEEE	Department of Environment and Natural Resources	<p>Either:</p> <ul style="list-style-type: none"> • Department of Environment and Natural Resources permit to operate, or • Environmental Compliance Certificate, or • Certificate of Non Coverage • If the document supplied does not reference the reprocessing activity, then another piece of evidence is required to confirm the reprocessing activity. 	
Russia	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	
Singapore	Packaging, batteries & WEEE	National Environment Agency of Singapore	National Environment Agency permit or licence	NEA permit is a minimum requirement. A number of these may be required for one site (e.g. for waste storage, discharges) Business registration is not valid on its own.
South Korea	Batteries & WEEE		<ul style="list-style-type: none"> • Local environmental permit 	
Sri-Lanka	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	
Switzerland	Batteries & WEEE		<ul style="list-style-type: none"> • Permit from local regime 	

Country	Regime ⁱ²	Regime details	Acceptable evidence	Notes
Taiwan	Packaging, batteries & WEEE		<ul style="list-style-type: none"> • Either: • Scrap Recycle Re-use Registration issued by the Local Government, or • Operation licence, or • Air or Water Pollution Control Certificate issued by the local Government <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	<ul style="list-style-type: none"> • A Regulated Recyclable Waste Operation Certificate is not acceptable BE
Thailand	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit • Factory Operating Licence <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	
Turkey	Batteries & WEEE		<ul style="list-style-type: none"> • Permit from local regime 	Scrap Importer document from the Ministry is not acceptable.
Ukraine	Packaging, batteries & WEEE	The Ministry of Ecology and Natural Resources	<ol style="list-style-type: none"> 1) (i) a licence issued by MENR or 2) (ii) a 'letter of exemption' issued by MENR 	The Ministry of Ecology and Natural Resources of Ukraine is the regulatory body and waste activities require a licence provided either by this ministry or the municipal authorities.
United Arab Emirates	Packaging, batteries & WEEE		<p>Either:</p> <ul style="list-style-type: none"> • Letter from competent authority, or • Reprocessing permit <p>Where the activity is not regulated:</p> <ul style="list-style-type: none"> • ISO 14001 certificate 	
USA	Batteries & WEEE	Environmental Protection Agency	<ul style="list-style-type: none"> • Permit from local regime 	
Vietnam	Packaging, batteries & WEEE	Department of Resources and Environment	Certificate of eligibility for the import of scraps	
