

COMPETITION & ANTITRUST AND TRADE | SUSTAINABILITY

# Consultation on New EU Waste Shipment Regulation on the Export of 'Green-Listed' Waste to Non-OECD Countries

## Introduction

Globalisation and economic growth have led to a global increase of waste transportation across boundaries. Whilst counter-intuitive, wastes are imported by some countries as they can be used as by-products, thus having a positive economic impact. Yet, various countries have over the years introduced regulations to manage such movement and trading of waste, including prohibiting in some instances the export of hazardous wastes, so as to avoid ruinous environmental damage and unforgivable damage to human health. These regulations are reviewed from time to time and updated as necessary by various countries, including in Singapore.

To this end, the European Union ("EU") had introduced new Waste Shipment Regulation 2024/1157 ("**Regulation**"), which entered into force on 20 May 2024, introducing stricter rules on the export of non-hazardous waste also known as 'green-listed' waste and a full ban on the export of plastic waste from the EU to non-OECD countries (i.e. countries which are not members of the Organisation for Economic Co-operation and Development ("**OECD**") and therefore not part of the OECD's control system for waste recovery). Singapore is a non-OECD country.

The purpose of the Regulation is to enhance the governance of waste shipments and its subsequent treatment at destination, and to prevent illegal shipments of waste within and beyond the EU, in order to meet the EU's policy ambition for a sustainable, resource efficient and climate neutral economy under the European Green Deal and to shape a regional circular economy that is also environmentally-sound under its New Circular Economy Action Plan. Given the approach that EU is taking to require non-OECD countries to actively request for permission to import, this will have a direct impact for Singapore businesses, including licensed waste management facilities, traders, shipping and freight companies. Hence, on 3 March 2025, the National Environment Agency ("**NEA**") in Singapore commenced a consultation seeking views on the impact of the Regulation. The consultation closes on 17 March 2025.

In this Update we highlight key aspects of the Regulation and the applicable dates, and how interested stakeholders may contribute their voice to NEA's consultation.

## Key Aspects of the Regulation

Whilst the new Regulation entered into force on 20 May 2024, there is a staged approach to its in-force dates. Most provisions will apply from 21 May 2026 and most export rules will apply from 21 May 2027. Until then, the provisions of the prior Waste Shipment Regulation 1013/2006 will continue to apply. The export of hazardous waste from the EU to non-OECD countries remains prohibited.

## Transboundary movement of the EU's 'green-listed' waste to Non-OECD countries

A key change under the Regulation is the introduction of stricter requirements for the transboundary movement of 'green-listed' waste from the EU to Non-OECD countries, effective from 21 May 2027. Broadly, 'green-listed' waste refers to types of waste that are considered to be less harmful or less environmentally hazardous. For details of the types of wastes that are categorised as 'green-listed' waste please refer to Annex III, Annex IIIB and mixtures of non-hazardous waste listed in Annex IIIA of the [Regulation](#).

Non-OECD countries are required to submit a formal request to the European Commission of their willingness to import 'green-listed' waste and demonstrate their ability to manage the 'green-listed' waste sustainably. The exports from the EU are conditional on the waste being processed at licensed recovery facilities in the country of import or facilities carrying out interim operations (referring to temporary storage or preliminary operations prior to recovery operations) for further recycling in the same country at licensed recovery facilities or in other EU authorised countries. This contemplates businesses in Singapore being ready and able to carry out such recovery services if the wastes are to be imported into Singapore, whilst ensuring no negative impact on the environment here.

The European Commission will assess these applications and create a list of non-OECD countries authorised to import specific waste streams from the EU. Under the Regulation, the first list shall be adopted by 21 November 2026. The European Commission shall regularly, and at least every two years following the establishment of the list, update the list of countries to which exports are authorised.

## Plastic waste export rules

Another key change involves the movement of non-hazardous plastic waste. First, from 21 May 2026 to 20 November 2026 exporting clean, non-hazardous plastic waste (classified under B3011 of the Basel Convention) from the EU will be subject to the Basel Convention's Prior Informed Consent (PIC) Procedure. This means that an operator planning such shipments requires the prior consent of the designated authorities from the countries concerned (from origin to destination, including transit) before the shipment can occur. This will mean additional lead time being required as businesses manage their strategy for imports.

A total ban on such plastic waste exports from the EU to non-OECD countries will be in place from 21 November 2026 to 21 May 2029. Non-OECD countries can indicate their willingness to continue the import of non-hazardous plastic waste from the EU after 21 May 2029. Given Singapore's drive towards net-zero emissions by 2050, businesses will need to consider whether to continue such imports or to simply rejig businesses appropriately.

## The Consultation

NEA is seeking stakeholders' views on: (i) the types of waste to be 'green-listed'; and (ii) the potential impact on stakeholders' operations if these 'green-listed' waste types are banned from export from the EU to Singapore, if Singapore, being a non-OECD Country, is not included in the European Commission's list of countries authorised to import specific waste streams from the EU. The consultation closes on 17 March 2025.

We would be happy to discuss the potential impact further with you and assist with feedback submissions if required.

Further information and submission details can be found on NEA's website [here](#).

Please do not hesitate to reach out to our Team if you have any questions regarding this development.

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