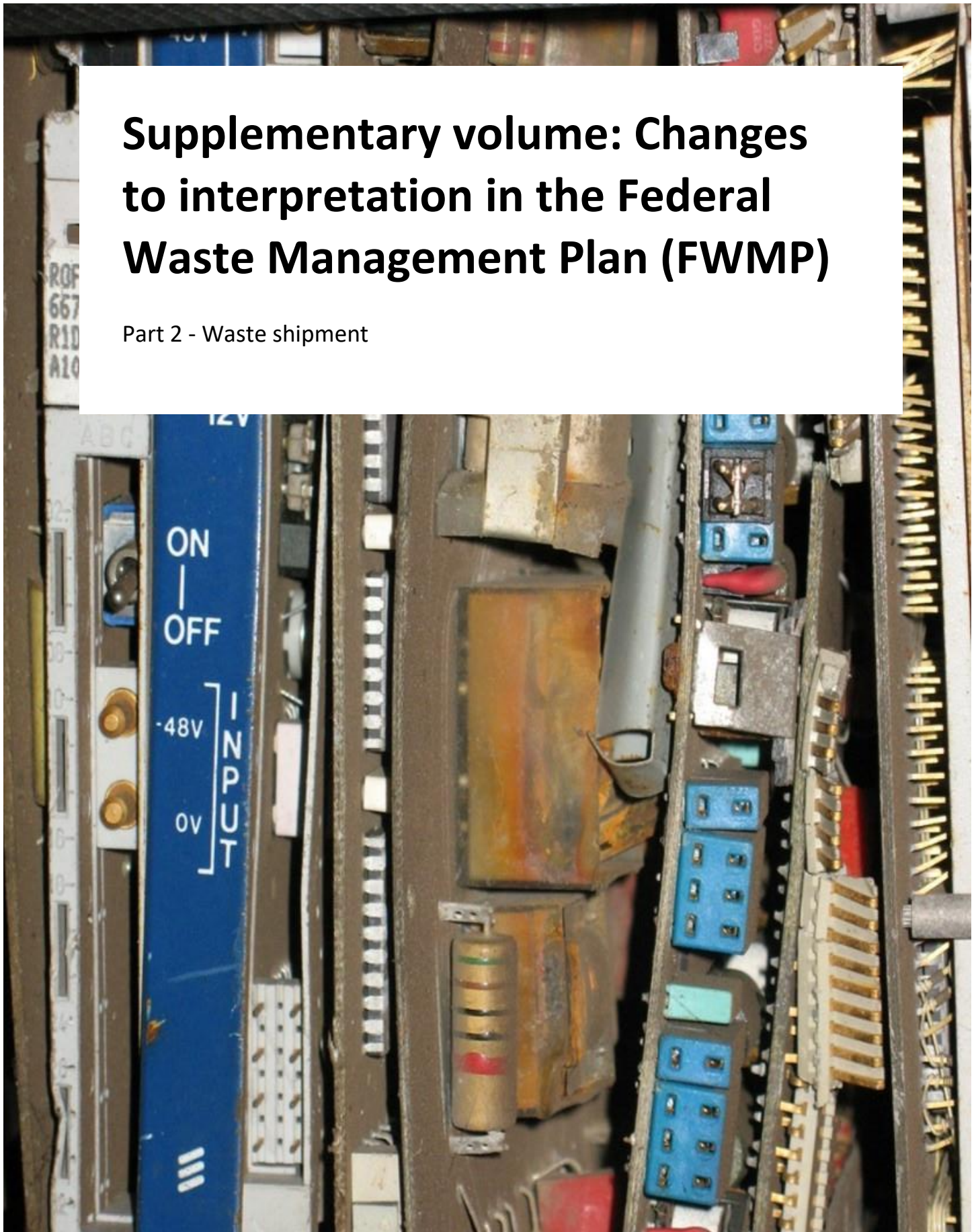


Supplementary volume: Changes to interpretation in the Federal Waste Management Plan (FWMP)

Part 2 - Waste shipment



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1 Introduction

This publication aims to adapt and amend certain interpretations of entries in the “Federal Waste Management Plan (FWMP) 2023 - Part 2” (Guidelines on Waste Shipment) to current international developments.

This primarily concerns waste electrical and electronic equipment (WEEE) or fractions thereof, for which new codes have been created at the Basel Convention level, as well as changes relating to the classification of composite cardboard packaging (e.g. ‘Tetra Briks’).

Furthermore, national guidelines for the distinction between product (by-product or end-of-waste status) and hazardous waste are also to be defined for iron precipitants (iron pickling agents - produced from production residues from the metallurgical industry) for wastewater treatment.

Clarifications have also been made for the categorisation of neophyte waste, gypsum waste resulting from the production of ceramic sanitary ware and scrapped power plant equipment.

Additionally the circular of the Federal Ministry of Austria Climate Action, Environment, Energy, Mobility, Innovation and Technology (BMK) regarding the classification of rigid PVC-waste (PVC-windows, PVC-pipes) in case of transboundary waste shipments is also to be integrated into this adaptation of the FWMP 2023 with specifications for the end-of-waste status of secondary PVC granulate/regrind.

2 Electrical and electronic waste and fractions thereof

Introductory note: References to Article 28 of Regulation (EC) No.1013/2006 on shipments of waste (EC Waste Shipment Regulation) will be considered as references to Article 29 of Regulation (EU) 2024/1157 as amended, starting from May 21, 2026 (EU Waste Shipment Regulation).

2.1 Codes GC010, GC020, B4030 - Notification obligation - Transitional period for shipments between EU Member States

At the 15th Conference of the Parties to the Basel Convention in June 2022, Decision BC-15/18 was adopted, which stipulates that all imports and exports of electrical and electronic waste will be subject to the notification and consent requirement starting from January 1, 2025.

From 1 January 2025, entries GC010 and GC020 on the Green List will no longer apply to shipments involving non-EU countries¹. This applies to exports from the EU to non-EU states and imports into the EU from non-EU states as well as transboundary shipments between EU Member States with transit through non-EU-states.

The code A1180 for hazardous electrical and electronic waste on the Amber List of the EC Waste Shipment Regulation, which is subject to notification, will generally no longer exist from January 1, 2025 and has been replaced by the code A1181.

From January 1, 2025, all non-hazardous waste from electrical and electronic equipment (WEEE), as well as components and waste from their treatment, must be assigned to entry Y49 for shipments involving non-EU Member States. All WEEE exhibiting hazardous properties, its hazardous components and hazardous waste from their treatment must be

¹ For members of the EEA: Norway, Iceland and Liechtenstein, the requirements for shipments between EU member states apply. Switzerland is not an EEA member, but a third state.

assigned to the new entry for hazardous waste: A1181. Particular attention must be paid to the wording of the new entries, as the allocation in the case of the involvement of third countries differs significantly from shipments between EU Member States due to different textualisations of the applicable codes.

In accordance with the implementation of the Basel Decision on shipments of electrical and electronic waste (WEEE) into the EC Waste Shipment Regulation No. 1013/2006 by Delegated Regulation (EU) 2024/3229 (or Delegated Regulation (EU) 2024/3230 amending the new Shipment Regulation (EU) 2024/1157) the export of non-hazardous waste under entry Y49 and hazardous waste of entry A1181 to non-OECD countries is generally prohibited!

Note

The export of non-hazardous electrical and electronic waste to OECD countries that are not EU Member States or EEA countries is subject to notification and authorisation, even if these countries continue to classify this waste under entries GC010 or GC020 on the Green List.

2.2 Shipments between EU Member States - 2-year transitional period

2.2.1 Maintenance of green listing of waste electrical and electronic equipment and fractions thereof until December 31, 2026

For transboundary shipments of non-hazardous electrical and electronic waste (WEEE) between EU Member States without transit through non-EU countries a transitional period applies until December 31, 2026 according to which wastes on the Green List with the entries GC010 and GC020 are still subject to the regime of the Green Waste List of the EC Waste Shipment Regulation (carrying the Annex VII form and existence of a recovery contract pursuant to Art. 18(2)). With regard to the allocation of waste to GC010 and GC020 for shipments between EU Member States, the explanations in the Federal Waste Management Plan (FWMP) 2023, Part 2, continue to apply, whereby references to code A1180 are now to be understood as references to A1181.

The entries GC010/GC020 do not include shredder fractions. Detailed explanation on the correct classification of shredder fractions can be found in Chapters 2.3.5 and 2.3.6 in this publication.

Note

Code Y49 does **not apply** to shipments between **EU Member States!** Please note that the codes Y49 and GC010/GC020 are not congruent!

For electrical and electronic waste without hazardous properties, the codes GC010/GC020 apply to shipments within the EU ('risk-based approach according to the OECD Council Decision').

Stricter views of the competent authorities involved in the shipment in certain EU Member States (e.g. classification as 'non-listed waste' subject to notification or in accordance with the precautionary principle classification under code A1181) are in any case decisive within the meaning of Article 28 of the EC-Waste Shipment Regulation.

Shredded fractions of WEEE containing less than 90% metal by mass are always non-listed waste subject to notification and consent procedure for shipments between EU Member States and under no circumstances GC010/GC020.

As of **January 1, 2027** all transboundary shipments of non-hazardous WEEE (so far code GC010/GC020) between EU Member States will be subject to the procedure of prior written notification and consent. From January 1, 2027 the code Y49 must be used for these wastes in the case of transboundary shipments.

Note: By this date, the central EU system for the electronic transmission and exchange of documents on waste shipments referred to in Article 27 of Regulation (EU) 2024/1157 should be fully operational. There is the possibility of further developing the system of pre-consented facilities for WEEE recyclers/recoverers by then, so that longer consent for shipments and shorter decision times by the authorities are possible.

2.3 Examples for waste classification

Note on the EU-wide classification of waste electrical and electronic equipment

The EU Commission explicitly pointed out that no criteria for a harmonised classification of pre-treated electrical and electronic components as B1010 scrap metal have been created at EU level yet. Such criteria can be defined in the future (following the submission of specific proposals by the Member States) by means of a delegated EU regulation and will then be binding for all EU Member States. Of course, the prerequisite for authorised exports to third countries is that the competent authorities in the respective countries will follow this 'EU classification'.

Different interpretations in the Member States are therefore possible until a concretisation at EU level.

2.3.1 Electric motors, generators, stators, starters, oil-free transformers, uncontaminated transformer cores (laminated sheets) and other electrical components

Only for shipments between EU Member States for recovery without transit through non-EU countries these electrical or electronic wastes, as long as they do not have hazardous characteristics, will fall under Green List GC010 until December 31, 2026. After that date - according to the current status - they will be classified as waste requiring notification under code Y49, even for shipments between EU Member States.

As long as it is clearly identifiable as components from electrical or electronic equipment, it is not permissible to classify as 'B1010 metal scrap'.

For shipments between EU Member States and non-EU countries, code Y49, which is subject to notification, is relevant, if the components are non-hazardous (otherwise code A1181). Exports of waste with codes Y49 and A1181 to non-OECD countries are generally prohibited.

Note

The relevant codes for electrical or electronic components must be specified as EWC codes and Austrian key numbers in the context of notifications for shipments to OECD countries or in Annex VII forms of the EC-Waste Shipment Regulation in case of shipments between EU-Member States, no codes for scrap metal may be used.

Remark: Separate fractions of metal housings, such as housings of stators made of aluminium or cast iron, can be classified under B1010 Metal scrap (Green List). However, no codes (EWC codes, Austrian key numbers) for electric or electronic components may be specified on the accompanying documents under waste legislation.

2.3.2 Compressors after oil removal

The compressor itself is not a purely electrical component, but a mechanical component; however, it is operated by an electric motor that drives it. Therefore, the electric motor is an integral part of the compressor. Compressors are classified under code GC010 for shipments between EU Member States and under code Y49 for shipments to third countries (export prohibition to non-OECD countries), provided that it can be proven that compressor oil and CFCs/HCFCs/HFCs/HCs have been removed from compressors used in heat exchangers according to the State of the Art.

Note

The complete removal of compressor oil by drilling, slitting or cutting open the compressor is by no means sufficient for reclassification as scrap metal B1010. Even when emptied according to the state of the art, the compressor remains waste under code Y49 (or GC010 for shipments within the EU).

As long as it is clearly identifiable as a compressor (with motor), it is not permissible to classify it as 'B1010 metal scrap', even if the compressor has been cut open and freed from liquids according to the state of the art. The compressor can only be classified as metal scrap (a mixture of ferrous metals with copper) under B1010 according to Annex IIIA

of the EC Waste Shipment Regulation, once it has been shredded, with a metal content exceeding 90 mass % and no hazardous contamination present.

2.3.3 Electricity meter

An electricity meter is a measuring device for recording electrical energy consumption. There are both analogue and digital (electronic) electricity meters. Both types shall be assigned to code GC020 for shipments between EU Member States (unless the other country involved in the shipment classifies certain digital electricity meters as hazardous waste under code A1181 due to the presence of a button cell, to back up the data in the event of a power failure). This is because the plastic content can be up to about 30 % (with the metal content around 70 % or slightly more), and the wording of entry GC010 'electrical assemblies consisting only of metals or alloys' does not apply to analogue electricity meters (electrical devices) either.

For shipments to non-EU countries, the electronic power meters fall under entry Y49 (unless the other country involved in the shipment classifies certain meters as hazardous waste under A1181 due to the presence of a button cell to preserve data in the event of a power failure), and thus, they are subject to the export ban to non-OECD countries.

2.3.4 Rotors

Although rotors with an electrical function are mechanical components, they contain electrical windings to generate magnetic fields and are therefore regarded as electrical components, e.g. rotors in electric motors or in electric machines with magnetic induction (e.g. in induction motors).

Rotors, that do not have an electrical function, do not generate or conduct electricity are exclusively responsible for mechanical tasks (e.g. propeller rotors, pump rotors in centrifugal pumps, flywheels) and are classified under the entries for metal scrap B1010 or B1040 for power plant scrap, provided they were specifically used in power plants, such as in turbine engines. A turbine rotor is the rotating part of a turbine (e.g. a steam, gas or water turbine) and is used to extract mechanical energy from a flowing medium (steam, gas, water). This mechanical energy can then be converted into electrical energy in a generator, for example.

A rotor in an electric motor or generator, on the other hand, is an electrical component as it is directly involved in the generation or utilisation of electrical energy and must not be assigned to entries B1010 or B1040.

2.3.5 Shredder fractions with more than 90 % metal content - Green List

The non-ferrous (NE) metal shredder fraction of code B1050, as well as other metal scrap fractions under code B1010, are still considered waste on the Green List (scrap), even if they originate from the treatment of electrical and electronic equipment. In Austria, a metal content of at least 90 mass % is required for Green List classification. This means that the proportion of electrical or electronic scrap such as circuit boards, cable remnants etc. and other impurities in the metal scrap must not exceed 10 mass % in total.

This applies both to shipments within the EU and to shipments involving non-EU countries. For exports, the specified control procedure according to Regulation No. 1418/2007 (as amended) regarding the export of certain waste listed in Annex III or IIIA of the EC Waste Shipment Regulation applies. Any stricter interpretations by the competent authorities involved in the transboundary shipment of waste regarding the classification of scrap from the treatment of electrical and electronic waste shall predominate (cf. Article 28 of the EC Waste Shipment Regulation – priority of stricter classification).

2.3.6 Shredder fractions with metal contents below 90 % - notification requirement

If the shredder fractions mainly originate from the shredding of small electrical and electronic equipment or contain higher proportions (i.e. more than 10 mass %) of electrical or electronic waste such as circuit boards, cable remnants, etc., these fractions must be assigned to code Y49 or, in the case of hazardous properties, to code A1181. They are subject to notification and consent requirements and the export ban for shipments to non-OECD countries. In case of transboundary shipments between EU Member States these shredder fractions are non-listed waste subject to the notification and consent procedure (never GC010 or GC020) or, in the case of hazardous properties, wastes of code A1181.

If the shredder fractions with a metal content of less than 90 mass % originate from the joint shredding of metal waste, end-of-life motor vehicles and waste electrical and electronic equipment (with less than 10 mass % of electrical or electronic waste such as

circuit boards, cable remnants, etc.), they are considered non-listed waste requiring notification. This concerns both, transboundary shipments between EU Member States and shipments involving third countries.

Fractions from the shredding of large appliances (e.g. large shredders processing so called 'white goods' or end-of-life vehicles) without hazardous properties and with metal contents below 90 mass % are to be classified as non-listed waste, requiring notification both for transboundary shipments between EU Member States and for shipments involving third countries. There is no export ban to non-OECD countries, unless the authority in the importing country explicitly classifies these wastes under Y49.

Fractions from the shredding or processing of small waste electrical or electronic devices, when shipped to non-EU countries, must always be classified under code Y49, provided they do not contain hazardous substances (otherwise, classification under code A1181 applies). These fractions are subject to notification and consent requirements, as well as an export ban to non-OECD countries. In case of transboundary shipments between EU Member States these shredder fractions are non-listed waste subject to notification and consent procedure (never GC010 or GC020) or, in the case of hazardous properties, wastes of code A1181.

2.3.7 Plastic fractions from the treatment of electrical and electronic waste

Plastic fractions from the treatment of electrical and electronic waste are to be regarded as entries specifically listed in Annex VIII or II of the Basel Convention in the case of transboundary movements. For shipments of this plastic waste to OECD countries, the codes AC300 for hazardous plastic fractions or Y48 for non-hazardous plastic fractions are to be applied. Only pure, uncontaminated plastic fractions explicitly intended for recycling can be categorised under code B3011 of Annex IX of the Basel Convention or Annex III of the EC Waste Shipment Regulation. Relevant documentation to prove compliance with impurity and pollutant limits and regarding the intended recycling process is required. For more detailed classification (required limit values for non-hazardous impurities and non-target plastics as well as POP-limit values), see FWMP 2023, Part 2 - codes B3011 and EU3011.

2.3.8 Photovoltaic elements

Silicon photovoltaic modules as waste², when shipped involving non-EU countries (except EEA countries), are subject to the notification requirement (Y49). For shipments within the EU, code GC020 applies. Export to non-OECD countries is prohibited. Classification under the Green List entry: B1040 scrapped power plant equipment, provided they are not contaminated with lubricating oil, PCBs, or PCTs to such an extent that they become hazardous, is generally not allowed for electrical and electronic waste.

² Only tested, functional PV modules intended for reuse are considered non-waste (see differentiation between WEEE and second-hand goods and requirements for used electrical and electronic equipment in the Federal Waste Management Plan 2023, Part 2, page 35 - Chapter 7.2.2.4, point B, i)

3 Scrap assemblies from electrical power generation – Code B1040

Entry B1040 'Scrap assemblies from electrical power generation not contaminated with lubricating oil, PCB or PCT to an extent to render them hazardous' refers to power plant-specific components such as turbines, penstocks, large generators within the meaning of the Basel Convention, unless they are covered by other entries in Annex IX to the Basel Convention.

Non-power plant-specific electrical or electronic waste such as switchgear and control devices, monitors, electronic speed controllers, cable waste, high-voltage cables, compressors, electric pumps, motors, lighting fixtures, meter elements, rotors with an electrical function (e.g. rotor in an electric motor or generator), gearboxes, electro-mechanical brakes or photovoltaic (PV) modules from power plants do not fall under entry B1040, but under waste electrical or electronic components with or without hazardous properties, depending on the specific type of waste.

Power plant-specific rotors that have no electrical function, do not generate or conduct electricity and are solely responsible for mechanical tasks (such as in turbine engines) are classified as waste under entry B1040 (see also the explanations in chapter 2.3.4).

Note: Rotor blades from wind turbines made of non-thermoplastic, fibre-reinforced plastic (such as carbon fibre or glass fibre reinforced plastic waste) are subject to notification and consent requirements (EU48 or Y48) for transboundary shipments.

Mixtures of various types of waste from the dismantling of power plants, such as mixtures of metals, electronic waste and concrete residues, are non-listed waste that is always subject to notification and consent requirements.

4 Cable waste

4.1 Distinction between Entries for Cable Waste and Electronic Waste

The distinction for the classification of cable waste under the entries for cable waste (B1115, A1190 or non-listed waste - interpretation according to FWMP 2023 - Part 2) is only partially aligned with the definitions for cables according to the Austrian WEEE (Waste Electrical and Electronic Equipment) Ordinance and the EU WEEE Directive and is not congruent for the purposes of implementing Basel Decision BC-15/18 in the context of transboundary waste shipments.

4.1.1 Cable waste considered as WEEE for the purpose of transboundary shipment

Cable waste that has plugs, sockets, or similar components attached at their ends are subject to the notification requirement for electrical and electronic waste under code Y49 or, under code A1181 in case of hazardous properties. For shipments of cable waste with plugs, sockets, or similar components within the EU, a classification under GC020 may apply on a case-by-case basis (provided proof of non-hazardousness), as detailed in the previous sections of FWMP 2023 - Part 2 under the entries for cable waste B1115 or A1190.

4.1.2 Cable waste not considered as WEEE for the purpose of transboundary shipment

Cable waste that does not have plugs, sockets, or similar components attached at the ends, or cable waste designed for a nominal voltage of 250V or higher, are components outside the scope of the WEEE Ordinance and the EU WEEE Directive. When these cables become waste, they fall under the specific entries for cable waste (B1115, A1190, or non-listed – interpretation according to FWMP 2023 - Part 2) and are not classified under electronic waste entries.

5 Composite cardboard packaging waste

5.1 Composite cardboard packaging waste - code BEU04 versus code B3020 in the EC Waste Shipment Regulation

5.1.1 Code: BEU04 - Composite packaging consisting mainly of paper and some plastic and containing no residues and not classified in Basel entry B3020

The classification of composite cardboard packaging for recycling must now always be done under the specific code BEU04 according to Annex IIIB of the EC Waste Shipment Regulation (Note: In the FWMP 2023 - Part 2, waste from paper, cardboard and paper products - laminated cardboard was still assigned to B3020).

This code BEU04 covers, from an Austrian perspective, all types of composite cardboard packaging, including so-called 'tetra-briks' (paper packaging with plastic coating and/or aluminium and plastic coating), even if it is production waste that has not yet been folded into a packaging form.

The code BEU04 is therefore only to be regarded as Green List waste (Annex IIIB of the EC Waste Shipment Regulation) for shipments for recycling/recovery between EU Member States, without transit through non-EU states (except EEA states).

Transboundary shipments of 'tetra-briks' to non-EU countries, imports from non-EU countries, and shipments between EU Member States with transit through non-EU countries are always subject to the notification and consent requirements.

Note

The classification of composite packaging waste under code B3020 'laminated paper waste' in Annex III (Green List) of the EC Waste Shipment Regulation is no longer permitted! Some authorities (including authorities in some EU Member States) classify composite packaging as non-listed waste, subject to notification and consent requirements (Article 28 of the Waste Shipment Regulation applies – precedence of stricter classification).

5.1.2 Code: B3020 - Waste paper, cardboard and paper products, provided they are not mixed with hazardous waste

Paper grades are classified in accordance with EN 643: European List of Waste Paper and Standard Grades or CEPI - European List of Standard Grades of Waste Paper and Board, but regardless of this, now composite cardboard packaging must always be classified under code BEU040 on Annex IIIB (notification requirement for shipments to or from non-EU countries or in transit through non-EU countries).

The following paper and cardboard waste and scrap are to be classified under this entry:

- unbleached paper or paperboard or of corrugated paper or paperboard
- other paper or paperboard, made mainly of bleached chemical pulp, not coloured in the mass
- paper or paperboard made mainly of mechanical pulp (for example, newspapers, journals and similar printed matter)
- other, including but not limited to
 - unsorted scrap (e.g. misprints)
 - laminated paperboard (except composite packaging)

For composite cardboard packaging, see now entry **BEU04 (Annex IIIB)**.

6 Halogenated plastic waste – additional explanation to PVC-window profile and PVC-pipe waste

6.1 Classification of rigid PVC-waste (PVC-window profiles, PVC-pipes) that is not proven to originate from production of PVC-goods since 2015 (in particular rigid PVC-waste from dismantling or demolition)

6.1.1 Relevant EWC codes

Classification criteria are provided below. Deviating from the general statements on the classification of plastic waste in the Federal Waste Management Plan 2023, Part 2, for PVC window profile waste and PVC pipe waste, a classification as hazardous waste should only be applied when specific analytical results confirm the presence of hazardous amounts of lead stabilizers (and possibly phthalates toxic to reproduction in seals).

- **07 02 13:** Waste plastic (waste from the MFSU³ of plastics) - production waste
- **17 02 03:** Plastic (General category: construction and demolition wastes)
- **19 12 04:** Plastic and rubber (if mechanical treatment of the waste has taken place, e.g. sorting, crushing/shredding, compacting, pelletizing)
- **17 02 04*:** Glass, plastic and wood containing, or contaminated with hazardous substances (General category: construction and demolition waste) - if it is definitely proven through analytical results that hazardous properties are met or when the competent authority in the country of dispatch/destination classifies the waste as hazardous.
- **19 12 11*:** other wastes (including material mixtures) from the mechanical treatment of waste containing hazardous substances (provided that mechanical treatment of the waste has taken place, e.g. sorting, crushing/shredding, compacting, pelletizing) - when it is definitely proven through analytical results that hazardous properties are

³ Manufacture, Formulation, Supply and Use

met or when the competent authority in the country of dispatch/destination classifies the waste as hazardous

Note

In the case of **dispersible PVC waste** that does not have a verifiable lead content of less than 0.3% by mass (= limit value for HP10 toxic for reproduction), plastic waste with hazardous properties must be assumed (notification and consent procedure for transboundary shipment - Code: AC300 or A3210).

6.1.2 Transboundary waste shipments - always subject to notification requirement

PVC window profile waste and PVC pipe waste that cannot be proven to originate from the production of rigid PVC goods since 2015 and that contain lead stabilizers⁴ (particularly rigid PVC waste from dismantling or demolition) are always considered waste subject to the prior written notification and consent procedure in the case of transboundary shipments.

Note: The transboundary shipment of whole window waste (a mixture of PVC, glass, metal, seals) is always subject to the notification and consent procedure, as it constitutes a non-listed mixed waste. The same applies to wood window or metal window waste (mixed materials).

⁴ The addition of lead stabilisers in the manufacture of PVC products has only been prohibited throughout the EU since 2015! The REACH Regulation banned the import of PVC products containing lead from third countries. The phase-out of cadmium-based stabilisers was already achieved in the EU-15 in 2001 and this obligation was completed throughout the EU by 2007.

6.1.3 Classification for shipments between EU Member States

EU48

Plastic waste not covered by entry AC300 in Part II or by entry EU3011 in Part I of Annex III, as well as mixtures of plastic waste not covered by point 4 of Annex IIIA of the EC Shipment Regulation - if no specific analyses are available.

AC300

Plastic waste, including mixtures of such waste, containing the constituents listed in Annex I in such quantities or contaminated with them to such an extent that they exhibit one of the properties specified in Annex III in accordance with Annex IV Part II of the EC Shipment Regulation - if it is analytically proven in the specific case that hazardous properties are fulfilled.

6.1.4 Classification of imports and exports between OECD countries and EU Member States

Y48

Plastic waste, including mixtures of such waste, with the exception of the following: — plastic waste that is hazardous waste (see entry A3210 in Annex V, List A, Part 1) as well as plastic waste listed under B3011, provided it is destined for recycling in an environmentally sound manner and almost free from contamination and other types of wastes (abridged text) in accordance with Annex II of the Basel Convention - in the absence of specific analyses

AC300

Plastic waste, including mixtures of such wastes, containing or contaminated with Annex I constituents, to an extent that it exhibits an Annex III characteristic in accordance with Annex IV Part II of the EC Shipment Regulation - if it is analytically proven in the specific case that hazardous properties are met.

6.1.5 Classification for imports from non-OECD countries into EU member states

Y48

Plastic waste, including mixtures of such waste, with the exception of the following: — plastic waste that is hazardous waste (see entry A3210 in Annex V, List A, Part 1) as well as plastic waste listed under B3011, provided it is destined for recycling in an environmentally sound manner and almost free from contamination and other types of wastes (abridged text) in accordance with Annex II of the Basel Convention - in the absence of specific analyses.

A3210

Plastic waste, including mixtures of such waste, containing or contaminated with Annex I constituents, to an extent that it exhibits an Annex III characteristic in accordance with Annex V Part 1 of the EC Waste Shipment Regulation - if in the specific case it is definitely analytically proven that hazardous properties are met.

6.1.6 Exports to non-OECD countries

Exports of all PVC waste to non-OECD countries are prohibited without exception.

6.2 Classification of rigid PVC waste (PVC window profiles, PVC pipes) from proven ongoing production of PVC goods since 2015

6.2.1 Relevant EWC codes

- **07 02 13:** waste plastic (waste from the MFSU⁵ of plastic) - production waste
- **17 02 03:** plastic (Chapter: construction and demolition waste)
- **19 12 04:** plastics and rubber (if mechanical treatment of the waste has taken place, e.g. sorting, crushing/shredding, compacting, pelletising)

⁵ Manufacture, Formulation, Supply and Use

6.2.2 Assignment to the Annexes of the EC Waste Shipment Regulation

Depending on the proportion of impurities (non-plastic impurities, non-target plastics), the codes EU3011 (Green List) or EU48 (obligation to notify) may apply in case of shipments between EU Member States, if third countries are involved, the code Y48 is decisive.

Remark: PVC waste is not part of code B3011!

6.2.3 Classification for shipments between EU member states for recycling

EU3011

Polyvinyl chloride (PVC) in accordance with Annex III of the EC Shipment Regulation - if this waste has a total content of non-hazardous impurities of at maximum 6 mass % (which also includes plastic waste other than PVC and non-plastic components)

EU48

Plastic waste not covered by entry AC300 in Part II or by entry EU3011 in Part I of Annex III, as well as mixtures of plastic waste not covered by point 4 of Annex IIIA of the EC Shipment Regulation – if this waste has a total content of non-hazardous impurities of more than 6 mass% (which also includes plastic waste other than PVC and non-plastic components)

Notice

Since the code EU3011 only applies within the EU, the existing notification obligation under the Basel Convention must be observed for shipments through transit states that are not members of the EU or EEA.

6.2.4 Classification of imports from third countries (OECD countries, non-OECD countries) into EU Member States

Y48

Plastic waste, including mixtures of such waste, with the exception of the following: — plastic waste that is hazardous waste (see entry A3210 in Annex V, List A, Part 1) as well as plastic waste listed under B3011, provided it is destined for recycling in an environmentally sound manner and almost free from contamination and other types of wastes (abridged text) in accordance with Annex II of the Basel Convention - imports are subject to the procedure of prior written notification and consent without exception.

6.2.5 Exports from EU Member States to OECD countries

Y48

Plastic waste, including mixtures of such waste, with the exception of the following: — plastic waste that is hazardous waste (see entry A3210 in Annex V, List A, Part 1) as well as plastic waste listed under B3011, provided it is destined for recycling in an environmentally sound manner and almost free from contamination and other types of wastes (abridged text) in accordance with Annex II of the Basel Convention - exports are subject to the procedure of prior written notification and consent without exception.

6.2.6 Exports from EU member states to non-OECD countries

Exports of all PVC waste to non-OECD countries are prohibited without exception.

6.3 End-of-waste classification criteria for rigid PVC regrind or granulate

The determination of the end-of-waste status for pure, clean PVC regrind or granulate from processed PVC window profiles or PVC pipes can only occur if it is proven through quality assurance that the lead content (from stabilizers) consistently remains **below 0.1 %** by mass and that a quantitative separation of sealing materials has been carried out.

7 Gypsum (Chemical Industry) - Code B2080

7.1 Additions to the previous statements on B2030 in the Federal Waste Management Plan 2023 - Part 2

7.1.1 Additional relevant EWC code

10 12 06: discarded molds (Chapter: wastes from manufacture of ceramic goods, bricks, tiles and construction products)

The entry B2080: Waste gypsum arising from chemical industry processes not included on list A (note the related entry on list A, A2040) may also include mold gypsum waste that arises from the production of ceramic sanitary equipment (washbasins, etc.), provided that these wastes are pure and not contaminated.

Since this technical interpretation is somewhat more extensive than the word interpretation, the status of the classification in the country of dispatch or destination involved must always be determined before starting the transboundary shipment. Article 28 of the EC Waste Shipment Regulation applies - priority of the stricter classification.

8 Used tyres versus old tyres – code B3140

The entry in the Federal Waste Management Plan 2023 Part 2, B3140 Waste pneumatic tyres, excluding those destined for Annex IV (Basel Convention) Section A (note: disposal), is corrected insofar as the general classification of motor vehicle tyres as waste (waste tyres) only takes place once they exceed an age of **10 years**.

The following change to the note for this entry has also been made regarding triple-packed /nested used tyres. The phrase: ‘and quadrupled tyres’ as non-waste has been deleted.

According to a current expert opinion commissioned by the Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology (BMK) from the recognised sworn expert for tyre assessments and tests, Prof. Dr. Ing. Günter Willmerding, titled: ‘Classification of used tyres as waste’, 5 March 2025 **under no circumstances more than 3 tyres** should be fitted or pressed into each other, even if they are quality-assured in accordance with the tyre dimensions, as this is no longer possible without causing damage.

Therefore, all tyre compactions exceeding 3 tyres must be assumed a priori to be waste.

9 Iron precipitation agents produced from production residues of metallurgical processes

9.1 Criteria for the distinction between waste and product

As a minimum requirement for recognizing used iron etchants as a by-product or as a material with end-of-waste status when used as a precipitation agent, a documented quality assurance must demonstrate compliance with the guideline values of **DWA-A202**⁶ 'Chemical-Physical Processes for the Elimination of Phosphorus from Waste water (issued May 2011)' or **Type 2 according to the standard: OENORM EN 888** (issued on 01.05.2023) 'Products for the Treatment of Water for Human Consumption – Iron(III) Chloride', which are considered State of the Art⁷ in wastewater treatment.

It should be noted that these are guideline values and not limit values and that an individual assessment is therefore required in the event of minor deviations with regard to individual parameters. High levels of heavy metals in untreated iron pickling solutions are later found in the sewage sludge and can lead to the sewage sludge exhibiting the hazard characteristics 'HP14 - ecotoxic/aquatic toxic' or, in the case of higher nickel contents 'HP7 - carcinogenic'. Furthermore its utilisation (composting or direct application in accordance with existing regulations in the Federal Provinces) or energy recovery (ashes containing heavy metals as residue - problems in the production of phosphorus fertilisers) will be impaired. In any case the introduction of hazardous waste into sewage treatment plants is prohibited under water legislation.

⁶ DWA-A202 of the German Association for Water, Wastewater and Waste is to be amended in the future; a review process took place in 2024.

⁷ In determining the State of the Art, reference shall be made in particular to those comparable processes, facilities or modes of operation, which overall, are most effective in achieving a generally high level of protection for the environment.

10 Neophyte waste

Relevant EWC Codes for Neophytes:

- **20 02 01:** biodegradable waste
- **20 01 99:** other fractions not otherwise specified (separately collected fractions)

It is important to note that neophytes (i.e., non-native plants) that arise as waste from land clearing activities, must not be classified as Green List waste under code BEU05 'Clean biodegradable waste from agriculture, horticulture, forestry, gardens, parks and cemeteries' according to Annex IIIB of the EC Waste Shipment Regulation. Instead, they are considered non-listed waste requiring notification and consent. Only within the framework of a notification procedure the competent authorities can assess the appropriate method of treatment to prevent further spread of these invasive species.

A classification of certain neophytes with toxic constituents, such as giant hogweed, as hazardous waste under the Austrian Waste List Ordinance is not required. The method of disposal depends on the type of neophyte (seed-free, seed-containing).

Excavated soil material containing invasive plant species (neophytes) is always classified as non-listed waste, requiring notification- and consent procedure. The presence of neophytes in the soil is considered an 'additional characteristic' but does not affect the chemical quality of the excavated soil or the classification of the waste type. The presence of neophytes should preferably be documented in an expert report or in another appropriate manner.

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