

## Packaging Waste - Evidence of broadly equivalent standards v7 September 2011

Any document submitted as evidence that an overseas reprocessing is operating to broadly equivalent standards must meet the following criteria. It must:

- relate to the specific overseas reprocessing site that is being applied for and
- have a valid date at the time of submission and
- refer to the reprocessing activity and the conditions/standards that it needs to operate and
- 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 a permit. A copy of the permit and translation must be supplied.

**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. An ISO14001 is not acceptable if the site operates under a permitting regime. It will only be accepted where a country does not regulate the overseas reprocessing site through a permitting regime and if it meets the criteria listed above.**

A statement from the competent authority which shows that the reprocessing site is regulated and works within a system that meets broadly equivalent evidence is acceptable. However, listed **below** are examples of documents that are acceptable to demonstrate broadly equivalent standards in some countries. This must be read alongside [current waste shipment controls](#).

Please ensure you have the correct version number for this guidance as it will be updated regularly.

Country	Regime details	Acceptable documents	Notes
<b>Bangladesh</b>	Regulated at country level	<ul style="list-style-type: none"><li>▪ Permit from the People's Republic of Bangladesh</li></ul>	This document will include terms and conditions of operation.
<b>Brazil</b>	Regulated at	<ul style="list-style-type: none"><li>▪ Operating licence, Government State of 'XXXX',</li></ul>	'Certificate of Registration from Brazilian Army' / 'Certificate of Potentially Polluting

	state level	from Environmental Secretariat	Activities' are not valid alone. Must have operating licence.
<b>China</b>		<p>3 documents are required:</p> <ol style="list-style-type: none"> <li>1. Business licence or Operator's licence and</li> <li>2. Import licence (SEPA)</li> </ol> <p>and at least one of the following</p> <ol style="list-style-type: none"> <li>3. Waste disposal certificate, environmental report or inspection report (valid within 2 years), waste emissions permit, pollution discharge permit</li> </ol>	<p>None of these are sufficient by themselves. A Business or Operator's Licence and SEPA Import Licence must be accompanied by one of the suggested acceptable documents.</p> <p>The SEPA (State Environmental Protection Administration ) (import) licence must be for the reprocessing site being applied for.</p> <p>An AQSIQ* is not a valid document because it relates to the importer and does not cover the reprocessing facility.</p> <p>*AQSIQ: General Administration of Quality Supervision, Inspection and Quarantine.</p>
<b>Egypt</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>Hong Kong</b>		<ul style="list-style-type: none"> <li>▪ Local Environmental Permit e.g. Water Pollution Control Ordinance</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>India</b>	Regulated at state level	<p>Either</p> <ul style="list-style-type: none"> <li>▪ Pollution Control Board Licence (PCB) <i>or</i></li> <li>▪ Authorisation/consent</li> </ul>	Extensions to PCB licences are not acceptable alone. The original licence must also be submitted.

		certificate	
<b>Indonesia</b>		<p>Either</p> <ul style="list-style-type: none"> <li>▪ Letter from competent authority, or</li> <li>▪ Liquid Waste Disposal Permit/ Discharge of Waste Water Standard , or</li> <li>▪ Emission Standard, or</li> <li>▪ Import Licence (LIMBAH)</li> </ul>	<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, and covers emissions to air from a static source (no expiry date).</p> <p>Liquid Waste Disposal Permit/ Discharge of Waste Water Standard issued by local Govt Authority (no expiry date).</p>
<b>Iran</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	<p>Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.</p>
<b>Malaysia</b>	Regulated by Department of Environment	<p>Either</p> <ul style="list-style-type: none"> <li>▪ Scheduled Waste Treatment and Disposal Facility from DoE, or</li> <li>▪ Environmental Impact Assessment from DoE with clear approval conditions.</li> </ul>	<p>Warehouse/ Manufacturing licences from the Ministry of International Trade and Industry are not acceptable.</p>
<b>Morocco</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	<p>Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.</p>
<b>Pakistan</b>	Regulated at state level.	Either	

	Pakistan have provincial environment protection agencies, all set up under The Pakistan Environmental Protection Act	<ul style="list-style-type: none"> <li>▪ Letter from competent authority, or</li> <li>▪ NOC ( no objection certificate)</li> </ul> <p>and NOC Import</p>	<p>A NOC for reprocessing is only acceptable if it relates to the manufacturing or reprocessing activity.</p> <p>The NOC Import must relate to the reprocessing site.</p>
<b>Nepal</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>Philippines</b>		<ul style="list-style-type: none"> <li>▪ Department of Environment and Natural Resources permit to operate or Environmental Compliance Certificate</li> </ul>	
<b>Singapore</b>	Regulated by National Environment Agency of Singapore	<ul style="list-style-type: none"> <li>▪ National Environment Agency Permit or licence</li> </ul>	NEA permit is a minimum requirement. A number of these may be required for one site (e.g. for waste storage, discharges).
<b>Sri Lanka</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>Taiwan</b>		Either Regulated Recyclable Waste	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant

		Disposal Enterprise Registration Certificate, or <ul style="list-style-type: none"> <li>▪ Operation licence</li> </ul>	ISO14001 will be accepted.
<b>Thailand</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>United Arab Emirates</b>		<ul style="list-style-type: none"> <li>▪ Letter from competent authority</li> </ul>	Where the activity is regulated by a licensing regime, a copy of the permit is required. However, where the activity is not required to be licensed, a relevant ISO14001 will be accepted.
<b>Vietnam</b>		<ul style="list-style-type: none"> <li>▪ Certificate of full conditions from Department and Resources (local provincial government)</li> </ul>	

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 Agencies<sup>1</sup> 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.

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<sup>1</sup> Environment Agency, Scottish Environment Protection Agency and Northern Ireland Environment Agency