Report from meeting of Waste Expert group – Waste Shipment Regulation

Closed session 20 June 2025, 14:30 – 16:30, Borchette + online

Participants:

- COM: ENV B3 and A2 representatives
- Member States: AT, BE, BG, CZ, DE, DK, ES, FR, IE, IT, LT, LV, MT, NL, PL, PT, HR, SI, SK;
- EEA countries: NO, IS;

1. Introduction and adoption of agenda

COM welcomed the participants of the meeting and presented its agenda. It informed the participants that the objective of the meeting is to (i) address questions that were parked during the Committee discussions on the implementing act for the interoperation of systems and that are rather related to the practical operations of the systems; (ii) inform them about the next steps in developing of and interconnecting with DIWASS as well as the further process of explaining and training on DIWASS; (iii) discuss the technical documentation on the development of the API.

COM also briefly explained how the facility completion certificates under Article 15(5) of the WSR would be implemented in DIWASS pursuant to the implemented act, revised in this respect after the public feedback phase of the act's preparation. COM underlined that such certificates would be linked directly with the notification document and could be submitted in relation to several movement documents based on such notification.

2. Q&A

COM presented replies to questions raised by MS experts during the preparation of the implementing act, concerning 6 detailed topics.

a) Changes of the operator's details in IMSOC and impact of such changes on documents exchanged via DIWASS

COM explained how changes of operator's details need to be approved in DIWASS, and how they would be reflected in documents that were submitted in DIWASS prior to introducing these changes. Then, COM presented how cases of mergers and divisions of operators would be handled.

Replying to MS questions, COM recalled that the term "main CA" refers to the CA in a given MS that approves operator registrations, and that this is relevant for registration of operators with registered offices in a country, where there are several CAs, and not for the management and decisions in notification procedures as such. COM also explained, that although DIWASS would not allow to transfer the portfolio of an operator that ceased to exist as a result of a merger, to another operator, the operator's account can be transformed into a site of the operator that took over such first operator. COM also clarified that the API would not offer a specific operation to

exchange history of changes in operator details, but based on data pulled from DIWASS by the local systems and the frequency of synchronisation, such history of changes can be reconstructed by the local systems themselves.

b) Issuance and changes of decisions

COM explained how CAs may introduce conditions to their consents in DIWASS, withdraw their decisions and update them. COM asked MS to indicate whether the withdrawal of decision should be updateable, to enable changing such decisions after national appeal procedures.

When replying to MS questions, COM reiterated that DIWASS would not link the possibility to generate movement documents with the status of financial guarantee due to the fact that DIWASS in general would not provide specific tools to manage financial guarantees. COM clarified also, that DIWASS would indicate a status for each movement document, indicating whether such documents were submitted, shipments covered by them are moving or were received by the consignee or facility.

c) Access to documents

COM presented the issue of carrier access to attachments to the notification document recalling the concerns raised by some MS that carriers should not be able to see all sorts of attachments due to confidentiality reasons. COM indicated that DIWASS may restrict carriers' access to certain types of attachments and invited MS to return with their detailed views on the scope of such restriction.

Several MS took the floor, indicating the types of documents that carriers should be able to see. One MS indicated that they do not see the need for carriers to see any of such attachments. COM invited MS to provide all feedback also in writing.

COM finally briefly presented how DIWASS would manage the access to documents of the operators, notably carriers, who had been removed from the notification after it was already consented to.

d) Timestamps

COM indicated that timestamps in DIWASS refer to the date when a document arrived in DIWASS (submitted there directly or via API), and not the time when document was uploaded in the local system or software. COM reiterated also that thanks to the obligation to synchronise with DIWASS after every action performed, discrepancies between these two moments should be minimised to the furthest possible extent.

e) Certain elements of "user friendliness" of DIWASS

COM briefly explained that DIWASS would notify CAs and operators on changes introduced to the system via automated e-mails. It also described that DIWASS will always present the most updated version of the document, recording the history of changes, but it would not – at least in its first version – allow to access the initial version of the document submitted.

COM indicated it is looking into other issues, flagged by MS experts, such as (i) possibility of extraction of data from DIWASS, (ii) practical way to divide works on notifications between

different users representing one CA, (iii) exact scope of e-mail notification system. COM also confirmed that operators from local systems can be migrated into DIWASS, provided that their details are arranged according to the requirements of the implementing act.

f) Introducing information into DIWASS on behalf of third country CAs and operators

COM explained the various scenarios in which EU CA or operator would be required to introduce data into DIWASS on behalf of third country CAs and operators that do not use DIWASS. COM also indicated that as soon as third country authority starts to use DIWASS, COM would ask this authority either to manage its operators in DIWASS, or to insert data to DIWASS on their behalf, so that this obligation would no longer burden the EU CAs. COM also proposed that in order to facilitate the process of registering third country CAs into DIWASS, it would ask MS to share the data and information of authorities that CA work with today. COM could then compile this information to detect any discrepancies, and then introduce it in DIWASS as the initial input of information.

Replying to MS questions, COM confirmed that in case data on behalf of third country CAs or operators needs to be introduced by EU CAs of transit, each of such authorities will be allowed to do it, but indeed it would need to be agreed, which of EU transit CAs is the one responsible to do it. COM proposed that it should be the first EU CA of transit and asked for MS views. It further explained that in DIWASS it would be clearly indicated where EU CA or EU operators insert data into DIWASS on behalf of another actor, and that it would be possible to attach statements signed by these other actors to the respective documents submitted in DIWASS. Adding such statements would however not be mandatory in DIWASS – the system would not require adding an attachment in order to submit a document.

Several questions were raised in relation to the use of DIWASS by third country operators. COM explained that it is still in the process of discussing the practicalities related to that, including also the issue of personal data protection transfers. COM indicated that it strives to present a clarification on that matter at the next meeting.

3. Next steps

COM presented a timeline for the next steps and the practical organisation of API testing process. As regards, the use of DIWASS GUI, COM asked MS to provide feedback on the best ways in which COM could support them. A training session for CAs and preparing manuals and instructions is already being planned by COM. It is however impossible for COM to provide trainings to the operators. COM suggested the preparation of instruction videos, if they are considered as a useful tool by MS experts.

Answering questions raised by MS, COM:

- confirmed that it would communicate its readiness to start the API testing process by sending an email to MS experts, underlining that MS may start tests when they would be ready for that;
- indicated that CAs may use several users for conducting tests, noticing that using more than 3 users per CA can slow down the testing process;

- recalled that the scope of the tests to be performed depends on MS decision reflected by Annex I to the implementing act on the manner of accessing DIWASS by CAs and their operators, and would be established based on Annex III to that act.

One MS indicated that it would be appreciated if involved CAs would – on a voluntary basis – share test sprint results, so that the same issue does not need to be reported to COM by multiple CAs. COM thanked for this suggested and indicated it would take this request into account when creating a common space for sharing technical documentation.

Another MS also pointed out that it would make sense to perform the tests only when respective functionality is fully developed in DIWASS, to avoid the need of re-testing. COM took note of that comment.

4. Technical documentation API

COM briefly presented the scope and structure of technical documentation shared so far with MS experts, asking for feedback on these issues.

5. Any other business

No points were raised, COM was however asked to explain what type of feedback MS experts are expected to provide on the document concerning attachment labels. COM clarified that such feedback should refer to (i) the list of labels as such (labels to be added or deleted), emphasising that COM has no strong position on that list, as it facilitates CAs work, (ii) list of attachments labels to which carriers should and should not have access.