



## Moving Precious Metals: Spent Catalyst for Recovery

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# Moving Spent Catalyst for Recovery

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- Product or Waste?
- Non-Hazardous or Hazardous?
- National & International Movements.
- Trans-Frontier Shipments.
- The Future?

# Product or Waste?

- Spent catalyst moving into or leaving the European Union must comply with EU legislation.
- Material in EU is either a product or waste.
- Products must comply with REACH. This includes both registration and the classification and labelling requirements.
- Spent catalyst may be considered as a product or 'Refinery Intermediate'. This will depend upon the local competent authority and prior registrations.
- Waste must comply with EC Regulation 1013/2006 on the Trans-boundary Shipments of Waste.

**Both Products and Waste must comply with the UN Modal Regulations for the transportation of dangerous goods.**

# Non-Hazardous or Hazardous?

- Gather as much information as possible regarding the composition: catalyst used, remaining products, solvents and pH's of solutions.
- Prepare a 16 section safety data sheet if possible. Does the material have a classification? (section 2: pictograms, hazard phrases).
- Find appropriate section in the European Waste Classification codes.
- Not Classified: material is non-hazardous and Green e.g. EWC 16 08 01.
- Classified: material is very likely a hazardous waste and considered to be Amber e.g. EWC 16 08 07\* or 16 08 02\*.
- Exceptions may arise, but careful interrogation of the waste classification requirements is needed and then further discussion with competent authorities, e.g. Aquatic Chronic 4.

# National Movements: UK Requirements

- Transfers within England and Wales are considered to be national movements of waste. Shipments from and to Scotland and Northern Ireland are trans frontier shipments.
- Non-hazardous waste requires a 'Duty of Care note' to accompany the movement.
- Hazardous waste requires a 'Hazard Waste Consignment note' to accompany the waste. These movements are registered quarterly with the Environment Agency and require a minimal transaction fee.
- Both non-hazardous and hazardous waste transfers must be carried out by an appropriately licenced carrier to a permitted site.
- Duty of care notes must be kept for 2 years and hazardous waste consignment notes for 3 years and made available for inspection if required.

# Trans-Frontier Shipments: Green Waste.

Complexity of the process depends very much on whether the waste is non-hazardous (Green) or hazardous (Amber). Green material requirements:

- Green Contract stating obligations of the various parties. May cover multiple shipments and has no official time limit.
- Correctly completed Annex VII or Green Tracking document to accompany the goods. This contains contact details of the various parties, description of the waste including EWC and Basel codes etc... It must be signed by the carrier each time the material is transferred to another carrier.
- Material must be carried by a licenced carrier for waste.
- Annex VII may be used for laboratory samples of < 25 kg or trial samples for recovery of < 20 kg which are hazardous.
- Documentation must be retained for 2 years and available for inspection.

## Trans-Frontier Shipments: Amber Waste.

- Amber material is hazardous waste or waste which is not adequately described by an EWC code.
  - Requires consent from all the parties involved: waste generator, transit countries and recovery facility. Tacit consent from transit countries is assumed if they fail to communicate within 30 days.
  - Allow at least 3 months before a shipment can commence. Much longer if bringing material into the EU or sending it out of the EU. Though is feasible if the other country is a cosignatory to the Basel Convention or the OECD Convention.
  - A pre-consented site considerably reduces the acknowledgement to consent phase.
  - Requires the completion of a notification form, obtained from the competent authority of generation and a number of other documents.

- The following documentation is required:
  - Completed notification form and partially completed movement document.
  - Amber contract specific only to the quantities and duration of the notification.
  - Financial guarantee to cover the cost of recovery if the recovery facility is unable to complete recovery.
  - Description of waste generation process.
  - Waste licences for the haulier and the route which the waste will take.
  - Description of the recovery process and genuine recovery information.



# Trans-Frontier Shipments: Amber Notification Process

- Notification documents submitted to the competent authority where the waste is generated.
- Documentation assessed, further questions asked, then forwarded to the transit countries and country of destination.
- Country of destination (and transit countries) ask further questions and then issue an acknowledgement (destination only). Consent then follows either 7 or 30 days later depending upon whether a pre-consent is held.
- Movement document circulated to all interested parties 3 -30 days before shipment commences.
- Shipment arrives at recovery facility, movement document re-circulated indicating receipt of material.
- Recovery certificate issued after material has been recovered to all interested parties.

# The Future?

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- The EU recognises that the Amber notification process is time consuming. There are some discussions to simplify the procedure for materials which are a restricted resource and essential to the growth of the EU economy. PGMS are in this list of materials.
- A number of electronic notification systems are in place: Austria, Portugal and the UK. They are based on the notification form but don't talk to each other.
- Globally more countries have shipments of waste procedures and keen to show off their environmental credentials.
- From 1<sup>st</sup> January 2017, EU member states are expected to implement inspections on waste shipments and report in detail on their findings.



**Thank you for your time!**

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