



Interpretation and Guidelines for self-declaration – requirements for international transport of waste materials

Version 1.0 - November 2025

In June 2025, Better Biomass published version 1.0 of the 'Interpretation and Guidelines for Self-Declaration for Waste and Residue Disposers' (hereinafter: 'the Guidelines'). Section 4.1 of the Guidelines specifies that Better Biomass requirements in legislation and regulations for waste and residues can be recognised as equivalent if the legislation and regulations ensure compliance with Better Biomass requirements regarding self-declaration. For collectors subject to these laws and regulations, this means they do not need to receive and manage self-declarations from the supplying disposers, and that risk-based auditing of the disposers as part of the collector's certification process is generally not required.

In response to questions from certificate holders, Better Biomass investigated to what extent it could recognize European regulations on cross-border transport of waste as equivalent. This concerns European Regulation (EC) No 1013/2006 on shipments of waste, and related European and national regulations.

The conclusion of this analysis is that the regulations concerning the cross-border transport of waste in general cannot be considered equivalent to the Better Biomass requirements for the self-declaration. The reason for this is that Better Biomass cannot determine whether national waste regulations in all countries where parties potentially dispose of waste ensure effective waste registration and monitoring, and whether adequate government oversight and enforcement are in place in those countries. Therefore, it cannot be determined whether the waste regulations in all these potential countries can be considered equivalent to the Better Biomass requirements for the self-declaration. Better Biomass can only perform an analysis of legislation and regulations for individual countries.

The above means that only in the following situations waste collectors do not need to receive and manage a self-declaration from supplying waste disposers:

1. When the disposer and collector are located in the same country, and Better Biomass has determined that the waste legislation and regulations for that country are equivalent to the Better Biomass requirements for self-declaration. The collector must be Better Biomass-certified.
2. If the disposer and collector are located in two different countries, and Better Biomass has determined that the waste legislation and regulations for both countries are equivalent to the Better Biomass requirements for self-declaration. The collector must also be Better Biomass-certified.

Note for information: the 'origin' of a waste material versus the 'point of origin '

The mandatory notification for an international transport of waste must specify, among other things, the "origin" of the waste. In that case, the "origin" can be the disposer of the waste, or the party that collected the waste in the country of origin and subsequently intends to export it. In practice, the exporter is usually the party that collected the waste in the country of origin.

If the party that collected the waste in the country of origin exports it, this party is considered a "collector" according to the Better Biomass definition. Information about the disposers of the waste

in the country of origin ("points of origin") is then not available within the system of mandatory notification and the regulations for the international transport of waste. Therefore, the regulations for the international transport of waste do not guarantee compliance with the Better Biomass requirements for self-declaration. In this situation, each disposer in the country of origin will have to submit a declaration to the party collecting the waste there. This party will also have to be Better Biomass certified.