

April 2025

Eurometaux comments on the draft implementing act on Digital Waste Shipment System (DIWASS)

Introduction

Eurometaux, the non-ferrous metals association, representing the full metal value chain from extraction, through transformation to recycling, would like to present its opinion on the draft implementing act that was published for public feedback in "Have Your Say" portal on 5th March 2025.

Facilitating intra-EU shipments of metal-containing waste is of paramount importance for our sector as it shall foster effective and efficient recycling of metals in the EU, allowing to secure their availability for green and digital technologies like wind turbines, solar panels, batteries, EVs, etc. Now, more than ever, clarity is needed on the waste flows, their volumes and destinations, to stop metal scrap leakage from the EU and to achieve full circular economy and resilience.

The new Waste Shipments Regulation (2024/1157) brings a number of good measures and one of them is the increased traceability of waste shipments via the Digital Waste Shipment System (DIWASS).

DIWASS – generic comments

Our sector fully supports that using DIWASS, or an interconnected system or software, will be mandatory as of 21/05/2026 and we are glad that all the preparatory steps are taken to implement it. As the system will serve for a digital exchange of documents and information, we trust that it will significantly reduce the current administrative burden for the waste shipments.

In our view, the digitisation of application for a notification will lead to:

- Uniform method of working by all EU competent authorities.
- Transparency (legal certainty) about the time frames to be respected by the competent authorities.
- Clarity on the status of a notification file.

Moreover, digitisation of the movement document and annex VII documentation will:

- Uniform method of working for all stakeholders.
- Lower the chance of completing the documents incorrectly.
- Bring clarity on the number of movements and weight on the notification.
- Bring clarity on the status of movement – and annex VII documents.

Detailed comments on the draft implementing act

Our sector would like to present the following specific comments on the draft implementing act:

- **Article 6(5):** The system requires that each economic operator must have at least one master user, while each competent authority must have at least two master users.



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- **Comment:** Having only one master user for an economic operator is too restrictive from life casualties' point of view (e.g., medical leave, etc). It would be better to have similar provisions as for the competent authorities, e.g. two master users. On the positive side, it is fine that the economic operator can add more standard users.
- **Article 7:** The process for registering economic operators is quite detailed (5 working days + 3 working days in case if additional information is needed).
 - **Comment:** It could be confusing for a user that works with the system for the first time. Could the Commission add a visual guide in the document or as an annex? Furthermore, while the annex does mention the possibility of system errors, the document does not specify a resolution timeline. Is such technicality considered to specify how much time the user will have for entering the input?
- **Article 13:** Article states that document attached must not exceed 32 MB.
 - **Comment:** There may be cases, though uncommon, where an attachment may exceed this limit.
- **Article 14(4):** The need for an audit log is mentioned.
 - **Comment:** There is no detail on how long the logs should be stored in the system. As we are dealing with commercially sensitive information it would be better to have it specified.
- **Obligation of companies (carriers) taking care of transport outside the EU territory**
 - **Comment:** Transport companies need to connect via e-FTI. Does this apply to carriers responsible for transportation outside the EU as well? There are concerns about how this regulation will affect ocean carriers, as well as those handling transportation that is mentioned in the notification. Our recommendation would be to exempt carriers taking care of transportation outside the EU territory from transport announcement under annex VII and movement documents in DIWASS.

Eurometaux is an industry association representing the collective European non-ferrous metals industry, including miners, smelters, refiners, fabricators and recyclers. The industry employs 500,000 people across over 900 facilities, with an annual turnover of €120bn.

Contact: Kamila Slupek, Sustainability Director, slupek@eurometaux.be

