



Landscape of waste shipment legislation - Finland, Sweden and Norway

Interreg
Aurora



Co-funded by
the European Union

KAMK macon

HAURU
Oululainen ympäristötekijä

 Kiertokaari

 **REBAB**

 **REMIKS**

WP 1- Nordic waste market overview

1.3- Analysing legal, administrative and other obstacles for a joint waste market. Jan 2024 - Dec 2025

This report focusing on waste shipment legislation has been prepared as part of the NOWA – Nordic Waste Management Vision project funded by Interreg Aurora Programme. The report, including interviews, was carried out during autumn 2024 – early 2025 and has been prepared in co-operation with NOWA project partners and is part of a series of reports produced in the project. Analysis of the interviews; assessments and conclusions are made by the NOWA project experts.

The NOWA project selected three waste fractions for investigation: hard plastics, incineration ash and food waste. The legislation and other information have been selected for this report at a general level, considering the selected waste streams and target countries as well as the recovery of waste (not disposal). The report brings together international and Finnish, Swedish and Norwegian national legislation, as well as other agreements, decisions, and target programs that also have an impact on future waste shipments.



<https://www.arcticwasteforum.com/landscape-of-waste-shipment-legislation-finland-sweden-and-norway/>

Content

INTRODUCTION	1
1. GENERAL WASTE TRANSFERS LEGISLATION BETWEEN FINLAND, SWEDEN, AND NORWAY	3
1.1. GENERAL INTERNATIONAL WASTE TRANSFER LEGISLATION	4
1.2. INTERNATIONAL AGREEMENTS AND DECISIONS OF WASTE MANAGEMENT	5
1.3. INTER-COUNTRY AGREEMENTS	6
1.4. INFLUENCE PROGRAMS, STRATEGIES, AND GOALS	7
2. IS THE MATERIAL WASTE OR A PRODUCT?	9
2.1. END OF WASTE AND BY-PRODUCT	9
2.2. DISAGREEMENTS ON CLASSIFICATION OF WASTE	9
3. RECOVERY AND DISPOSAL OPERATIONS	11
3.1. RECOVERY OPERATIONS	12
3.2. DISPOSAL OPERATIONS	12
4. WASTE CODES	13
4.1. EU/EC CODE	13
4.2. BABEL CODE	14
4.3. OECD CODE	16
4.4. CN CUSTOM CODE	17
5. PRINCIPLES OF WASTE CLASSIFICATION, GREEN OR AMBER WASTE	18
6. OVERVIEW OF THE WASTE SHIPMENT PROCESS	20
6.1. RESPONSIBILITIES OF THE EXPORTER (NOTIFIER), CONSIGNEE AND TRANSPORTER	21
6.2. MONITORING OF WASTE TRANSFERS	21
7. OPTIONS TO STREAMLINE WASTE SHIPMENTS	23
7.1. PRIOR APPROVAL OF INSTALLATION	23
7.2. BORDER-AREA AGREEMENTS	25
8. CHALLENGES IDENTIFIED IN THE PROCESS	26
8.1. CHALLENGES FROM THE AUTHORITIES' PERSPECTIVE	27
8.2. CHALLENGES FROM THE EXPORTER'S PERSPECTIVE	28
9. UPCOMING LEGAL CHANGES	30
10. OUTLOOK FOR THE FUTURE	32
11. CONCLUSIONS	33
12. RECOMMENDATIONS	35
ATTACHMENTS	36
SOURCES AND ADDITIONAL INFORMATION	36

The report highlights the legislation related to the waste shipment licensing process and other international and national agreement.

The report also provides a general overview of the waste licensing process related to waste shipments; the obligations of the exporter, consignee and transporter. The report includes the differences between green and amber waste in the process and identifies the main issues in assessing the nature of waste. Report also presents codes of practice related to waste shipments.

The legislation also provides possibilities to speed up and streamline the waste permit process using pre-approved facilities and border region agreements.

Laws, programs and strategies at national level in Finland, Sweden and Norway are presented in Annexes 1-3.

interreg Co-funded by the European Union Legislation Landscape in Finland, Sweden and Norway 1
Aurora

ATTACHMENT 2. Sweden

Contact information and applications

The table below lists the authorities and applications related to international waste shipments in Sweden, with explanations and contact information.

ENTITY	RESPONSIBILITY	CONTACT
Naturvårdsverket/ Environmental Protection Agency Office	In Sweden the Swedish EPA is the competent authority in matters regarding transboundary waste shipments and provides guidance to operators and other agencies regarding the rules and regulations that apply.	Env Wa Ofi Sto TEL inu: tavfall@nat. turvardsverket.se
Nordic TFS (The E-service Nordic TFS has been shut down since 30th of June 2022.)	A special notification document is to be used, but before you fill it out, send an email to the Swedish EPA providing details on your waste. This is necessary in order to receive a notification number (also called an SE-number) which you will include in your notification document. movement-document-1013-1.doc	Trans-boundary waste shipments inu: tavfall@nat. turvardsverket.se

Avfall Sverige; Swedish Waste Management 2023 Report

National waste transfers legislation; Sweden

Note, not all texts are available in English. Make sure the text is up to date!

Table below shows the legislation affecting international waste shipments in

Legislation	Summary
Regulations on the recycling and treatment of waste (the Waste Regulations) [SFS 2020:614]	The Swedish Waste Regulation (SFS 2020:614) is a regulation on shipments of waste. The Swedish Waste Regulation, stipulates that the Swedish Environmental Protection Agency (EPA) is the competent authority for shipments of waste, i.e. that it approves or objects (refuses) from Sweden.
Regulation on the incineration of waste (2013)	Regulation aimed to minimise the environmental impact of waste incineration. It required operators to monitor the emissions at the plant and to comply with emission limits.
Agreement between Sweden and Finland [SFS 2016:3]	Special rules apply to certain waste shipments between Sweden and Finland. Föreskrifter om förenklade förfaranden inom gränsområdet mellan Sverige och Finland

NOWA - Nordic Waste Management Vision

interreg Co-funded by the European Union Legislation Landscape in Finland, Sweden and Norway 1
Aurora

ATTACHMENT 1. Finland

Contact information and applications

The table below lists the authorities and applications related to international waste shipments in Finland, with explanations and contact information.

ENTITY	RESPONSIBILITY	CONTACT INFORMATION
Finnish Environmental Institute SYKE	is the competent authority and the contact person for cooperation with other competent authorities in the control of international shipments of waste as referred to in the Waste Shipment Regulation.	movementdocwaste shipments@syke.fi Contact persons and information for waste shipments
Numbers of waste transfer permits and statistics on waste transfers; Lätteiden viesti- ja tuontimäärät		
Finnish TFS e-service	is a service for international waste shipments, for the electronic notification of waste shipment notifications, waste shipments, waste reception and treatment.	wasteshipments@syke.fi SYKE - Finnish TFS
The Centre for Economic Affairs, Transport and the Environment ELY	South-Eastern Finland ELY Centre responsible for approving and registering waste transporters and brokers established outside Finland and for supervising them.	ympariston.asiakaspalvelu@ely-keskus.fi https://www.ely-keskus.fi/en/web/ely-en
Customs TULLI, Fintaric web-services	in cooperation with the Finnish Environmental Institute, supervises international shipments of waste.	kirjaamo@tulli.fi https://asiointi.tulli.fi/asiointi/shipvelu/fintaric/2
Finnish Food Authority	promote human, animal and plant health, support rural areas, develop and maintain information systems and issue import authorisations for category 1 or 2 by-products (establishment approval).	abp@ruokavirasto.fi Contact - Finnish Food Authority
TRADES web service	used, for example, for controls on EU internal market trade (animals and products of animal origin). Maintained by the European Commission.	sante-traces@ec.europa.eu TRACES - Finnish Food Authority
The Material Market Materiaalitori.fi	is an official application of the circular economy (Waste Act 646/2011, § 33 mom 2), where producers of waste, side streams and raw materials meet with buyers/processors and expert services.	materiaalitori@mottiva.fi Yhteystiedot - Materiaalitori

National waste transfers legislation; Finland

Note, not all texts are available in English. Make sure the text is up to date!

Table below shows the legislation affecting international waste shipments in Finland. The primary regulations governing all shipments between Finland, Sweden and Norway, are highlighted in orange. Those to be considered are indicated in green background color. Others, which only affect certain waste materials or cases, are indicated in blue.

NOWA - Nordic Waste Management Vision

interreg Co-funded by the European Union Legislation Landscape in Finland, Sweden and Norway 1
Aurora

ATTACHMENT 3. Norway

Contact information

The table below lists the authorities related to international waste shipments in Norway, with contact information.

RESPONSIBILITY	CONTACT INFORMATION
the competent authority and the contact person for cooperation with other competent authorities in the control of international shipments of waste as referred to in the Waste Shipment Regulation.	aksportimilodir.no E-mail only for transport announcements, confirmation of receipt and treatment: transport@miliodir.no
supervises and advises on international waste transport. Import Guide for drivers, and English: Digitoll for drivers - insund and @rie	Contact information: Contact us - Tolletaten
The Waste Management Department is responsible for international work, EU/EEA work and national waste policy development. The department is responsible for the Oslo Convention for the control of transboundary movements of waste.	postmottak@kid.dep.no Deputy Director General Hege Rooth Olbergsvæen, E-mail here: rooth.olbergsvæen@kid.dep.no

International waste transfers

The competent Agency, it takes some time after the application is received for the relevant consent, so we recommend applying three to four months before the shipment.

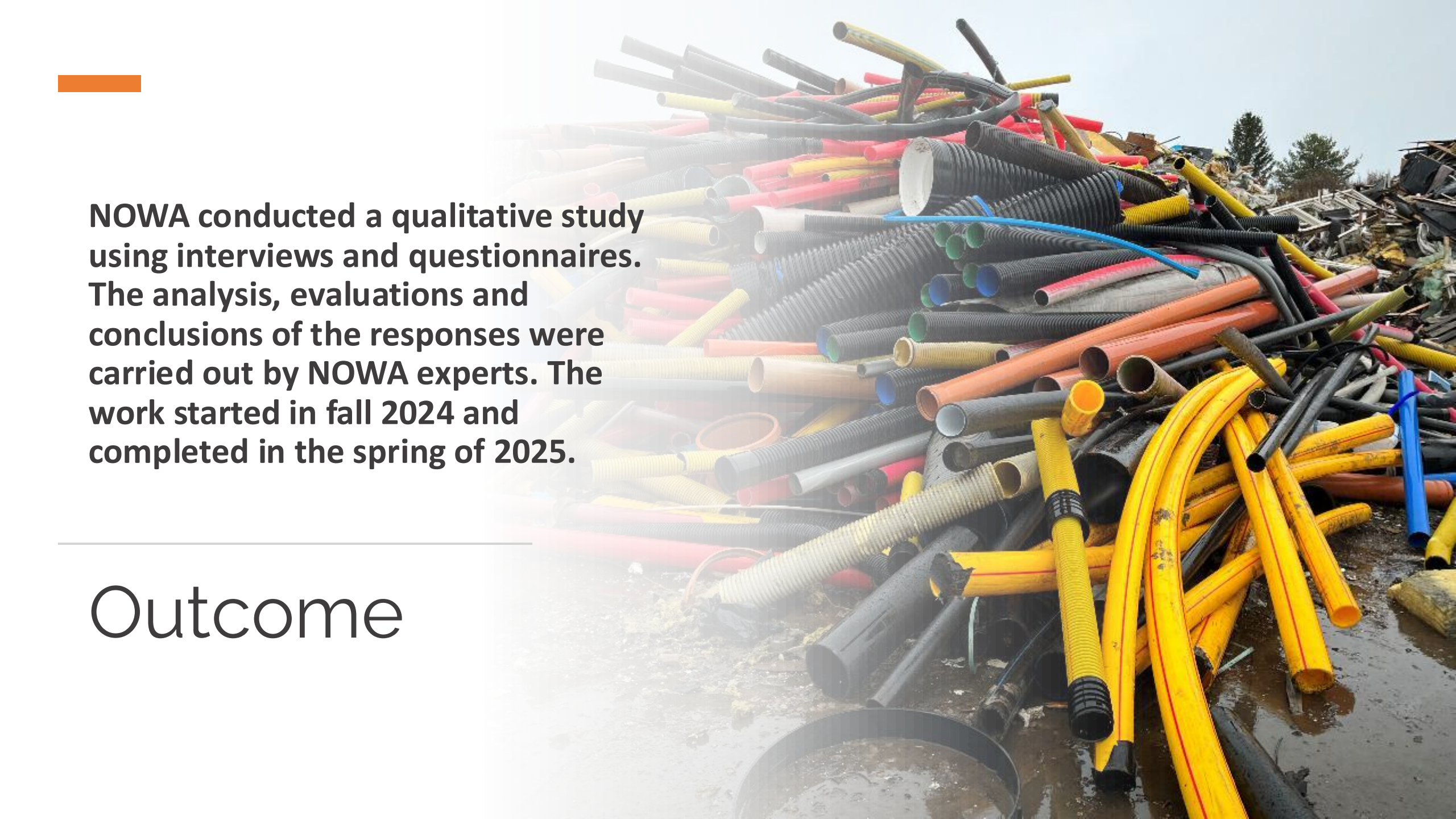
The competent Agency requires a valid financial guarantee, which must cover the amount in Article 6 of the EU Waste Shipment Regulation. The financial guarantee is the environmental authority and is valid for at least one year after the same financial guarantee can be used for several consents, as long as the conditions of the legislation are met.

The competent Agency accepts changes to the list of waste producers, the list of number of planned shipments after the consent has been given, but not the crossing, waste type, dates, quantity, facility or consignee.

The actual start of the shipment must be sent no later than three months before the shipment using Annex 1. It is important that both the NO number and the subject line of the email. Example: NO 123456 F. To the Norwegian you provide advance notification via email by sending in Annex 1B. It is important that the letter 'F' is mentioned in the subject line of the email.

NOWA - Nordic Waste Management Vision





NOWA conducted a qualitative study using interviews and questionnaires. The analysis, evaluations and conclusions of the responses were carried out by NOWA experts. The work started in fall 2024 and completed in the spring of 2025.

Outcome

Identified challenges and problems	Interviewed group			Harm rate			Summary
	Authorities	Municipalities/waste companies	waste companies	Mild	Medium	Major	
Using the right codes and harmonising codes	1	2					3
Lack of resources, knowledge and/or experience (authorities and applicants)	3	1	1				5
Different policies between exporting and importing countries, e.g. when importing country's authorities require additional documents, laboratory analyses or clarifications, views differ from those of the exporting country (waste, permits, technology)	3	2	2				7
National decision-making policy related items, such as perception of overly strict interpretation of the law by public authorities, lack of cross-sectorial dialogue, difficulty/unwillingness to change previously adopted decision-making policies		3	1				4
Absence of pre-approved establishments			1				1
Incorrect waste classification; product, EOW, by-product/waste, green/controlled, etc.	1						1
Unwillingness to start the authorization process due to expectation of its complexity		2	1				3
Incomplete application documents, such as lacking permit documents, due to negligence or intention	2		1				3
Costs of collateral, permit and batch documents			1				1
Short period of validity of permits		1	1				2
Scattered and out dated information of waste shipments due to overlapping regulations and authorities (e.g. in case of waste shipped under environmental permit)	2						2
Summary	12	11	9				32

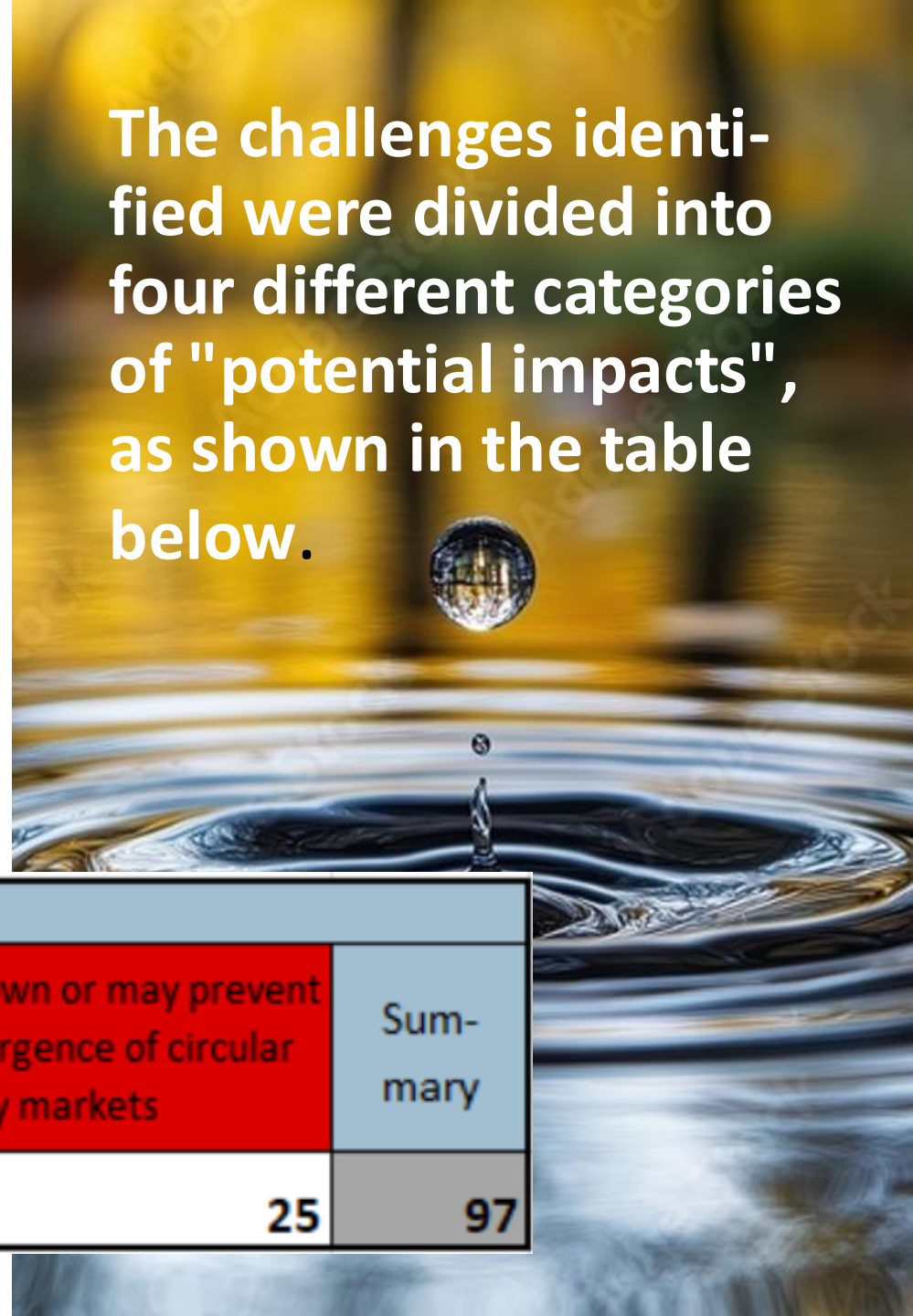
Challenges identified in the permit process

The interviews were conducted from three different perspectives to identify all the challenges and problems related to the shipment of waste between our countries. The interview groups selected were authorities, municipalities, municipal waste companies/waste processors and waste transport companies.

From the interview responses, 11 challenges were identified that have an impact on waste shipments and the emergence of waste markets. The challenges were partly distributed according to different perspectives and respondent groups, but common challenges were also identified.

Possible Impacts

The challenges raised in the interviews were assessed based on their impact on international waste transport and the emergence of common circular economy markets. The potential impacts were divided into four different categories. The table shows the level (intensity) of the impacts in different colors.



The challenges identified were divided into four different categories of "potential impacts", as shown in the table below.

Possible impacts				
Extend processing times	increases costs/resources	Reduced trust/understanding between authorities and companies, frustration towards authorities, can contribute to crime	Slows down or may prevent the emergence of circular economy markets	Summary
21	25	26	25	97



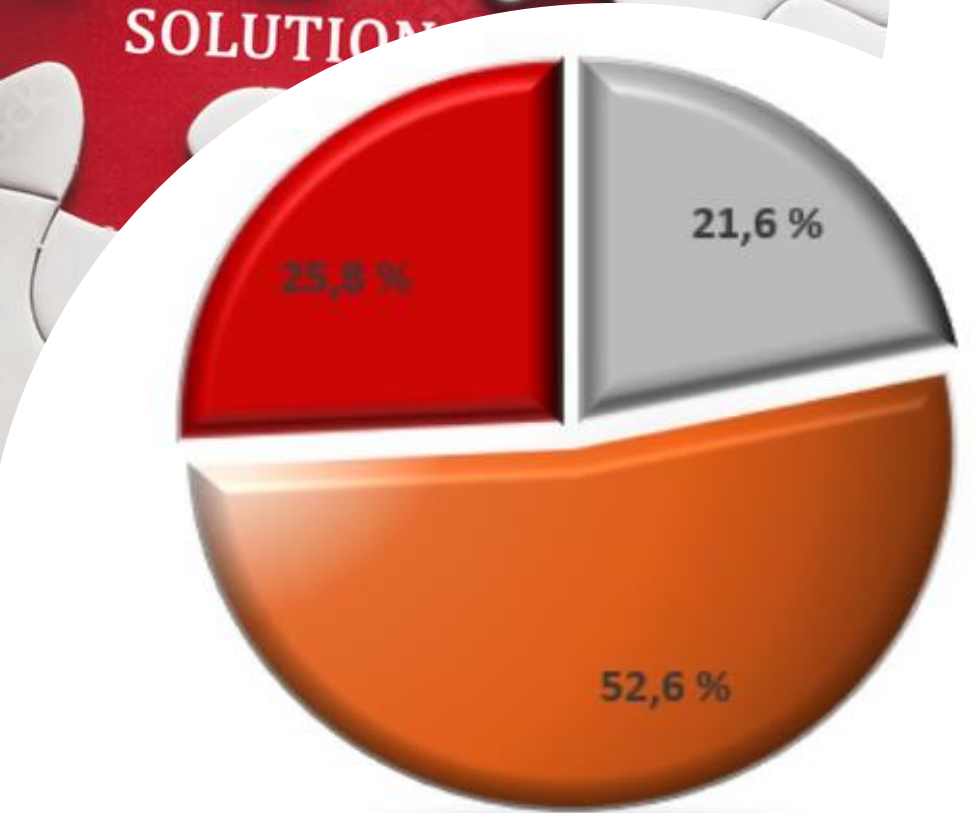
Conclusions

The interviews showed that the authorities and the exporter had different perspectives. In the waste shipment authorisation process, the authorities and the legislation aim to protect the environment and health. On the other hand, the cost-effective organisation of municipal waste management and the requirements of legislation and strategies for materials recycling and circular economy strongly tilt the balance. For waste transport companies, this is largely a business issue.

In the future, national security of supply and self-sufficiency, as well as proximity principles affecting the number of waste treatment plants, will also have to be considered to a greater extent.

The analysis of the importance of the challenges from the interviews shows a distribution with medium challenges being the most important.

However, even significant challenges do not necessarily require a change in the law, but training, cooperation and commonly agreed common practices will overcome most of the challenges related to waste shipments between our countries.



↓ impact ■ Medium impact ■ Major impact

What's coming up?

Legislation concerning waste transport is undergoing significant changes. Of the changes that will come into force after the transition period, those that are most relevant to the project have been selected for inclusion in the report.

The practical restrictions and details of the legislative changes that will come into force after the transition period will only become clear later (EU/authority policy, preliminary decisions). Issues to be resolved may include whether Norway will retain its position in the internal market and who will approve and inspect treatment facilities. The transition to the EU's common electronic waste shipment authorization system will initially lengthen the processing times for authorizations and require new learning on the part of all parties.

It is also possible to anticipate the future, although this is challenging in a rapidly changing world situation. The report links to upcoming legislative reforms, target and action programs and global meetings that may have major repercussions on future waste shipments.





Recommended follow-up actions

#737006363

- Organize dialogues between different stakeholders in Finland, Sweden, and Norway, as appropriate (authorities, municipal waste companies and waste transport companies), with the aim of solving problems identified in waste shipment processes, speeding up waste shipment processes and creating a common understanding of the situation and needs in the region.
- Clarification of the security, permit and specific charges for shipments of waste imposed by national authorities and the principles for setting them (interpretation of the EU Waste Shipment Act). How do the different charging principles affect the cost of waste shipments to the company?
- A comparison of the decisions taken by the Finnish, Swedish and Norwegian authorities on the technologies of the pre-approved plants and the characteristics of the waste to be received. Can the authorities' views be harmonized, and the number of pre-approved plants increased, especially in Finland and Norway?
- Share the experiences and observations gained in this project, especially to cooperation bodies operating in the region, and also take the message to the EU level, for the effective development of the circular economy in the region and to secure the opportunities offered by the legislation in the region.



Kiitos! Tack! Thank you!

Pihla Hasan
Project specialist, NOWA
tel. +358 40 353 3479
Pihla.hasan@kamk.fi

Interreg
Aurora



Co-funded by
the European Union

KAMK macon

