

To the kind attention of:

Ms Teresa Ribera Rodriguez

Executive Vice-President for a Clean, Just and Competitive Transition

Mr Stéphane Séjourné

Executive Vice-President for Prosperity and Industrial Strategy

Ms Jessika Roswall

Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Brussels, 21 October 2026

Subject: Digitalisation and operational failures in EU waste shipment rules put Europe's entire recycling ecosystem at risk

Dear Executive Vice-President Ribera Rodriguez,

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

The Commission has made strategic autonomy, industrial competitiveness and the circular economy central priorities, with the upcoming Circular Economy Act expected to stimulate demand for recycled materials and enable the creation of a single market for waste and recycled materials. However, the intentions set out at EU level must now be matched by concrete actions. Despite repeated commitments to building a competitive circular economy and removing barriers to cross-border trade between Member States, implementation on the ground remains insufficient. Persistent regulatory and operational obstacles impede the free movement of recycled materials, disrupt circular supply chains and ultimately undermine the EU's industrial competitiveness.

In this context, **Recycling Europe would like to voice recyclers' serious concerns regarding the significant implementation challenges arising from the revised waste shipment rules, and in particular, the rollout of the Digital Waste Shipment System (DIWASS).**

The current implementation of the Waste Shipment Regulation (WSR) is weakening the business case for recycling in Europe, contradicting the Commission's commitments to reduce administrative burdens, strengthen the Single Market and build a competitive circular economy. Our industry needs a framework that enables it to operate and grow, not one that creates further uncertainty and costs.

Recycling Europe strongly supports the digitalisation of procedures through a fully operational, reliable and fit-for-purpose digital platform. However, five months after the introduction of the DIWASS, Europe's recycling companies continue to face serious technical obstacles to their efforts in abiding by the obligations and procedures foreseen under the new waste shipment rules. Shipments that require notification are delayed or blocked due to technical malfunctions in the EU platform. As a consequence, our recycling **businesses end up dealing with a system that despite being in use for already five months, continues to experience errors and difficulties, forcing our recycling business to bear the economic consequences of these malfunctions.** With the mandatory digitalisation of shipments of non-hazardous waste approaching in January 2027 and new audit obligations for extra-EU shipments following in May, these issues could create a domino effect across the recycling industry.

Recycling Europe has repeatedly raised these concerns with the Commission's services and provided concrete examples of the aforementioned technical obstacles. Another concern we have repeatedly raised is the two-working-day advance submission requirement for non-hazardous waste shipments, which fails to reflect the operational realities of the recycling industry and risks creating further disruptions. Given the urgency and extend of the matter, **we find it really difficult to understand why the practical consequences for EU recycling companies are not being taken more seriously.** Their operations depend on reliable cross-border movements of materials, and our business cannot simply suspend shipments, postpone contractual obligations and carry the financial burden because the EU system does not yet work as promised.

It is even more concerning that the Commission intends to proceed with the next implementation phase on 1 January 2027 and practically bring even more shipments and operators into DIWASS. How can EU recyclers be expected to take this next step when the system is preventing them from effectively dealing with the current one? **Having a functioning system is a prerequisite for implementing deadlines. This is why extending the transitional period is a necessary safeguard that will allow proper testing and prevent a widespread disruption. Proceeding regardless of the consequences will not only disrupt recycling operations, but also industrial supply chains.**

Recycling companies produce and supply valuable, recycled materials that reduce Europe's dependence on primary resources and support industrial decarbonisation. Cross-border shipments are integral to their activities, as recycling capacities and industrial customers are spread across Member States. We must ensure that these activities can continue without unnecessary disruption and that the EU's ambitions for a circular economy and strategic autonomy are upheld.

We therefore urgently call on the Commission to postpone any further implementation phases, and in particular the mandatory digitalisation of shipments of (non-hazardous) waste until at least 1 July 2027, allowing paper-based shipments to continue during this period, until the EU platform functions properly, thereby allowing recycling businesses to complete the notification procedures smoothly.

In this context, we also urge the Commission to reconsider the two-working-day advance submission requirement, which we have repeatedly raised as an obstacle that fails to reflect operational realities and causes further disruption to recycling activities. This is essential to ensure legal certainty, prevent disruption to recycling supply chains, ensure the smooth functioning of Europe's recycling sector and ensure its competitiveness.

We count on the Commission's support in finding a constructive way forward and remain available to meet and discuss these concerns and possible solutions in more detail.

Yours sincerely,

Julia Ettinger
Secretary General, **Recycling Europe**