

Electronics recyclers warn: 'The system could get stuck'

# Headaches over pre-notification

**The revised Basel Convention, which regulates global shipment of e-waste, will make procedures more complex rather than less, according to experts speaking at the International Electronics Recycling Congress. Recyclers fear unworkable practices, too much paperwork and a lack of enforcement, with small countries and islands suffering the most.**

The new Basel Convention dominated the latest IERC in Salzburg, Austria more than anything else. 'It's a new reality and it's not going to be easy,' says Kamila Slupek of the European metals association Eurometaux. As a result of the recently adopted amendments to the convention, which entered into force on 1



IERC panel discussing the challenges arising from the new Basel Convention, which regulates global shipment of electronic waste.

January, international shipments of e-waste and scrap for recovery (including recycling) or disposal, are allowed only with a prior, very detailed, written approval of the importing country and any countries of transit.

**COMPLEX PROCEDURES**

It is this so-called PIC (prior informed consent) regulation that worries electronics recyclers shipping materials across borders between OECD and non-OECD countries.

‘We need a system that is more efficient and supports circularity but I doubt if that’s really the case,’ says Paul Hagen, head of environment law firm Beverage and Diamond. ‘The revision text of Basel Convention alone is 50 pages and in six languages. Then there’s the complex PIC documentation – so much paper-filling work. I mean, how do you want to get that all over by email?’

**HIRE MORE STAFF**

Eurometaux’s Kamila Slupek warns that ‘the system could get struck’ because of added bureaucracy. ‘More work means companies will be forced to hire more staff to get the notification paperwork organised, which means higher costs. But businesses have no choice: if it is not done in a workable way, they get stuck, our whole industry gets stuck.’

There are some major challenges with implementation, agrees Eric Capps of US-based IT management services provider Iron Mountain. ‘But, hey, the world is not ending. We’re gonna take a look at our downstream, see where materials are going and make a reset. I’m quite sure we’ll get there.’

**VULNERABLE PLACES**

For Colombia-based Daniel Ott of electronics recycling consultancy firm Reconomy, it is not that simple, especially not in the region where he is

active. ‘Even with the necessary permits in place, in some countries in Latin America you really don’t know if they will go according to regulation.’ According to Ott, the biggest challenge awaits small countries and islands in the Caribbean. ‘You cannot expect them to be compliant and organised from one day to the next. With the result they will no longer be able to ship their e-waste and so lock themselves into a growing e-waste mountain.’

**‘BAD THINGS’ TO HAPPEN**

It’s a big and serious risk, agrees Jim Puckett of environmental pressure group Basel Action Network. ‘We know from experience that bad things are going to happen when materials get stuck on islands or in a small country such as El Salvador. You’ll see more dumping, illegal shipments and bad recycling practices that you were trying to prevent with more regulation.’



Puckett believes it is crucial to focus on education. 'Make people and companies aware that some waste streams are not good and need to be handled with care,' he says.

At the same time, watchdog Puckett is pushing for more enforcement. Governments need to be tough and should constantly focus on chasing illegal practices and people doing wrong things, he argues. 'It never stops, you know. You crack down one place, the industry finds alternatives, as we've seen with UAE, Vietnam, Pakistan to name a few. Or Malaysia, where we've seen horrific practices with e-scrap like there were before in China and Hong Kong.'

#### LET'S GO DIGITAL

Another measure to support safe shipment and recycling of e-waste and help boost PIC, is digitalisation. 'Standard digital solutions are crucial to making PIC notification more efficient and workable for recyclers,' Slupek underlines. 'Some companies still use a fax machine to send out their filled papers. That really needs to change, so let's switch to proper electronic procedures.' 📧

#### VAN KERCKHOVEN (UMICORE): 'UNSAFE PRACTICES LURKING'

The dumping of e-waste from developed nations into developing countries remains a serious problem requiring urgent action, agrees Thierry Van Kerckhoven, head of supply recyclables at Umicore in Belgium. 'Stricter measures are needed to prevent this. However, the revised Basel Convention regulations may not fully achieve that goal.'

One of the reasons is that a loophole allowing exports for reuse or repair remains open, says Van Kerckhoven. 'While restricting waste dumping is essential, exporting certain e-waste fractions from developing countries to pre-consented facilities (PCFs) in OECD nations should be facilitated, not hindered.'

With fast growing domestic e-waste volumes, proper recycling is crucial for the optimal recovery of strategic materials such as nickel, silver, palladium and tin. 'These elements are critical in climate change mitigation and are often linked to geopolitical conflicts, such as in Eastern Congo, where control over mineral resources fuels instability,' the recycler points out.

He says the new Basel regulations raise trade barriers that affect recyclers like Umicore. 'They create logistical challenges, increase transport costs and complicate administrative processes. Also, transit countries may unnecessarily delay shipments, while local authorities may deprioritise e-waste exports.'

As a result, Van Kerckhoven fears, 'More waste will be dumped or processed through unsafe "backyard recycling", increasing pollution and health risks while reducing material recovery.'

A better approach is needed. 'Certain e-scrap fractions, such as printed circuit boards, should be treated as valuable resources rather than waste. The EU should also reduce administrative burdens for shipments to PCFs within its single market, encourage imports for proper recycling and ensure fair enforcement of Basel regulations globally.'



Experts fear more e-waste will be dumped or processed through unsafe 'backyard recycling'.

#### FAREWELL TO SALZBURG, SEE YOU IN VALENCIA... AND SHANGHAI

After more than 20 years, congress organiser ICM has decided to pack its bags and move the International Electronics Recycling Congress from Salzburg to another city. The next IERC gathering will take place in Valencia, Spain, on 21-23 January 2026.

Meanwhile ICM has been busy revitalising an Asian conference focusing on best practices in automotive, electronics and battery recycling across South-East Asia. The combined and trade show is scheduled for 11-14 November 2025 in Shanghai, China.

For more information, visit: [www.icm.ch](http://www.icm.ch)