Impact assessment of the Regulation of the Minister of Infrastructure on ‘Amendments to and Repeal of Regulations of the Minister of the Environment in Connection with Amendments to the List of Waste’

The amendments proposed by the draft Regulation will have no social impact, nor will they affect security, foreign relations or regional development.

Target group: natural and legal persons holding an environmental permit and registration

Impact on operators and economy:
the implementation of the Regulation will have an impact on holders of environmental permits. The obligation to submit a waste report applies to all operators receiving waste in the course of an economic activity. All operators that transport or handle waste in the course of their economic or professional activities have the obligation to submit a waste report. Not all operators are affected by the changes to the waste list. Those operators transporting or handling the types of waste indicated by the specified waste code are affected. Such waste management operators will need to make changes to their existing information systems and reporting systems, depending on whether the waste codes they currently use include any of the codes to be added by the draft. Waste management operators will also have to pay more attention to sorting and determining the origin of waste. The introduction of more specific eight-digit code numbers does not mean that operators who have previously held a permit with only a six-digit code number are no longer permitted to accept the same waste before their environmental permit is amended. The additional eight-digit code numbers must be added to the permit when the environmental permit is amended.
At the same time, consolidating the three existing lists into a single waste list will simplify operations for operators, as in the future they will need to refer to a single waste list instead of the three existing ones.
The newly added waste codes may be used in waste reports submitted in the calendar year following the entry into force of the Regulation.
The inclusion of a POS note in the waste list will increase operators’ awareness of persistent organic pollutants and may, in certain cases, necessitate a more thorough assessment of the composition of waste than before. This does not imply an automatic obligation to carry out laboratory analyses, but may lead to an additional assessment obligation in situations where there is insufficient information on the composition of the waste.
Overall, the impact on operators is fairly moderate and relates primarily to the transition to more detailed reporting and waste classification.

Impact on state and local government organisation
The repeal of the Regulations of the Minister for the Environment and the integration of the specified list of metal waste and products of concern into the waste list is in line with the principle of reducing red tape, by which the number of pieces of legislation to be complied with by undertakings and public authorities is reduced. As well as reducing bureaucracy, this also saves time for government agencies and operators in terms of administrative procedures and reporting.
The introduction of eight-digit waste codes and the specification of the waste list will improve the quality and level of detail of waste data, which in turn will facilitate monitoring, reporting and policy-making. More accurate data will allow a better assessment of waste flows, including those from products of concern and specific types of waste.
Marking treated and untreated waste water sediments with different waste codes reduces the workload of the Environmental Agency, which is responsible for drafting waste reports and

preparing summary reports to be submitted to the European Commission. The introduction of separate waste codes facilitates the availability of data on secondary generation of waste water sediments.

Significance of the impact: the proposed amendments will have a significant impact, as they will improve the quality of waste data, reduce red tape and cut down on the time spent familiarising oneself with the Regulation. In the past, it took a lot of time to navigate between the different regulations. In addition, our understanding of the occurrence of persistent organic pollutants and the identification and detection of hazardous substances is improving.

Impact on the environment and human health

The draft has a positive indirect impact on the environment.

The specification of the list of waste and the introduction of more detailed waste codes will improve the overview of waste flows and allow for better planning of waste management and waste reduction measures.

The inclusion of POS labelling helps draw attention to waste containing persistent organic pollutants and supports its proper management. This reduces the risk of such substances entering the environment and causing long-term damage to ecosystems and human health.