

18 January 2023

Ref: PCD1/BASEL/23-01

To: Plastic Waste Recyclers, Traders,  
Freight Forwarders and Declaring Agents

Dear Sir/Mdm,

## **UPDATE ON TRADENET REQUIREMENTS FOR THE TRANSBOUNDARY MOVEMENT OF PLASTIC WASTE UNDER THE BASEL CONVENTION**

### **Background on the Basel Convention and controls for import/export/transit of plastic waste**

Under the Hazardous Waste (Control of Export, Import and Transit) Act, local companies who wish to import, export or transit hazardous wastes are required to apply for a Basel Permit from the Chemical Control and Management Department (CCMD) of the National Environment Agency (NEA). Since 1 Jan 2021, the transboundary movement of certain types of plastic waste under Annexes II and VIII of the Basel Convention are subjected to the Prior Informed Consent (PIC) procedure, while plastic waste listed in Annex IX are exempted from the transboundary movement control and a Basel Permit is not required from CCMD. Please see **ANNEX A** for the listing of plastic waste in the Annexes of the Basel Convention.

2 NEA had shared in a previous circular<sup>1</sup> on the import and export controls implemented for plastic waste, namely (i) Basel permit requirements for plastic waste listed in Annexes II and VIII of the Basel Convention and (ii) TradeNet declaration requirement for import and export of plastic waste listed in Annexes II, VIII and IX of the Basel Convention.

### **Update on TradeNet declaration requirements**

#### Updated Harmonised System (HS) and product codes for plastic wastes

3 Following the implementation of ASEAN Harmonised Tariff Nomenclature (AHTN) 2022, the list of HS codes and product codes for plastic waste have been updated, as listed in **ANNEX B**. To avoid delays or rejection of TradeNet declarations, please ensure that plastic waste types are correctly declared using the most appropriate HS codes and product codes with reference to **ANNEX B**.

#### Additional requirement for submission of photographic evidence for TradeNet declarations for Annex IX plastic waste

4 Currently, the supporting documents required when declaring the import and export of plastic wastes in TradeNet include, but are not limited to, the bill of lading/air waybill, invoice, surveyor's report, contractual agreements with overseas counterparts and approvals from importing country. In view of the increasing international scrutiny on transboundary movement of plastic wastes, declarants are now required to submit photographic evidence of plastic waste for each import/export declaration for Annex IX plastic waste, on top of existing supporting documents. This is also in line with the Technical Guidelines for the Import and Export of Plastic Waste published by NEA in 2021<sup>2</sup>. This additional requirement will take effect from **1 Feb 2023**.

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<sup>1</sup> Circular on Implementation of TradeNet Controls for the Transboundary Movement of Plastic Waste under the Basel Convention published on 4 Aug 2020: <https://www.nea.gov.sg/corporate-functions/resources/legislation-international-law/multilateral-environmental-agreements/chemical-safety/basel-convention/circulars-on-control-of-hazardous-wastes-and-other-wastes>

<sup>2</sup> Technical Guidelines for the Import and Export of Plastic Waste: <https://www.nea.gov.sg/docs/default-source/our-services/pollution-control/hazardous-waste/technical-guidelines-for-transboundary-movement-control-of-plastic-waste.pdf>

5 In summary, the updated list of requirements is as follows:

- a) Declaration of plastic waste type(s) using the most appropriate HS codes and CCMD product codes;
- b) Submission of valid Basel Permit within the declaration for plastic wastes listed in Annex II and Annex VIII<sup>3</sup>;
- c) Submission of relevant supporting document(s) within the declaration for plastic wastes listed in Annex IX<sup>3</sup>, including and not limited to:
  - i. Bill of lading;
  - ii. Invoice;
  - iii. Surveyor's report;
  - iv. Contractual agreements with the overseas counterparts;
  - v. Approvals from the relevant authority of the importing country / exporter's declaration letter; and/or
  - vi. Letter of confirmation or approval permits from the relevant authority of the importing/exporting country for the transboundary movement of plastic wastes listed in Annex IX (i.e. to support that the shipment of plastic wastes is considered non-hazardous under the Basel Convention);
- d) Photographic evidence of plastic waste for each import/export declaration for Annex IX plastic wastes; and
- e) Plastic wastes listed in Annexes II and VIII are to be declared separately from those listed in Annex IX.

### Penalties

6 We would like to remind all plastic waste recyclers, traders, freight forwarders and declaring agents to adhere strictly to the declaration requirements. TradeNet declarations that are found non-compliant with the above requirements will be rejected for import/export. Any false or misleading declarations may constitute an offence under the Section 37(2) of the Hazardous Waste (Control of Export, Import and Transit) Act and the offender shall be liable on conviction to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 12 months or to both. In addition, the import or export of hazardous or other wastes under the Basel Convention without a valid Basel Permit may also constitute an offence under Sections 25(1) and 26(1) of the Hazardous Waste (Control of Export, Import and Transit) Act and the offender shall be liable on conviction to a fine not exceed \$300,000 for a body corporate; or \$100,000 and/or imprisonment for a term not exceeding 2 years for an individual.

### Clarifications

7 If you have any further queries on the domestic controls for import and export of plastic waste, please contact the following NEA officers from CCMD: Mr Mark Tan at Mark\_Tan@nea.gov.sg and Mr Lee Chin Chian at Lee\_Chin\_Chian@nea.gov.sg.

Yours faithfully,



Chen Fu Yi  
Chief Engineer  
Pollution Control 1 Division  
Chemical Control and Management Department  
National Environment Agency

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<sup>3</sup> Please refer to **ANNEX A**

## ANNEX A

### Listing of Plastic Wastes under Annex II, VIII and IX of the Basel Convention

Listing of Plastic Wastes		Requirements
Transboundary movement of the mentioned plastic waste will be <b>controlled</b> under the Basel Convention		
<b>Annex II</b>	<p><b>Y48:</b> Plastic wastes, including mixtures of such wastes, with the exception of the following:</p> <ul style="list-style-type: none"> <li>• Plastic waste which is hazardous waste pursuant to paragraph 1 (a) of Article 1</li> <li>• Plastic waste listed below (refer to entry <b>B3011</b>), provided it is destined for recycling<sup>1</sup> in an environmentally sound manner and almost free from contamination and other types of wastes<sup>2</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>• PIC procedure is required;</li> <li>• Shipment can only proceed if all Parties involved in the movement have provided their consent; and</li> <li>• Local companies dealing with the import, export or transit of the plastic waste that falls under the definitions in Annexes II and VIII will be required to obtain a Basel Permit and Banker's Guarantee.</li> </ul>
<b>Annex VIII</b>	<p><b>A3210:</b> Plastic waste, including mixtures of such wastes, containing or contaminated with Annex I constituents, to an extent that it exhibits an Annex III characteristic.</p>	
Transboundary movement of the mentioned plastic waste will be <b>exempted</b> from control under the Basel Convention		
<b>Annex IX</b>	<p><b>B3011:</b> Plastic waste listed below, provided it is destined for recycling<sup>3</sup> in an environmentally sound manner and almost free from contamination and other types of wastes<sup>4</sup>:</p> <ul style="list-style-type: none"> <li>• Plastic waste almost exclusively consisting of one non-halogenated polymer, including but not limited to the following polymers: <ul style="list-style-type: none"> <li>- Polyethylene (PE)</li> <li>- Polypropylene (PP)</li> <li>- Polystyrene (PS)</li> <li>- Acrylonitrile butadiene styrene (ABS)</li> <li>- Polyethylene terephthalate (PET)</li> <li>- Polycarbonates (PC)</li> <li>- Polyethers</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Clean plastic waste ready for immediate recycling</li> <li>• PIC procedure is not required</li> <li>• Local companies dealing with the import, export or transit of the plastic waste are not required to apply for a Basel Permit and Banker's Guarantee.</li> </ul>

<sup>1</sup> Recycling/reclamation of organic substances which are not used as solvents (R3 in Annex IV B) or if needed, temporary storage limited to one operation provided that it is followed by operation R3, and evidenced by contractual or relevant official documentation.

<sup>2</sup> In this respect, international and national specifications may offer a point of reference.

<sup>3</sup> Recycling/reclamation of organic substances which are not used as solvents (R3 in Annex IV B) or if needed, temporary storage limited to one operation provided that it is followed by operation R3, and evidenced by contractual or relevant official documentation.

<sup>4</sup> In this respect, international and national specifications may offer a point of reference.

	<ul style="list-style-type: none"> <li>• Plastic waste almost exclusively<sup>5</sup> consisting of one cured resin or condensation product including the following: <ul style="list-style-type: none"> <li>- Urea formaldehyde resins</li> <li>- Phenol formaldehyde resins</li> <li>- Melamine formaldehyde resins</li> <li>- Epoxy resins</li> <li>- Alkyd resins</li> </ul> </li>   <li>• Plastic waste almost exclusively consisting of one of the following fluorinated polymer wastes<sup>6</sup>: <ul style="list-style-type: none"> <li>- Perfluoroethylene/propylene (FEP)</li> <li>- Tetrafluoroethylene/per fluoro vinyl ether (PFA)</li> <li>- Tetrafluoroethylene/per fluoro methylvinyl ether (MFA)</li> <li>- Polyvinylfluoride (PVF)</li> <li>- Polyvinylidene fluoride (PVDF)</li> </ul> </li>   <li>• Mixtures of plastic wastes, consisting of polyethylene (PE), polypropylene (PP) or polyethylene terephthalate (PET), provided they are destined for separate recycling<sup>7</sup> of each material and in an environmentally sound manner, and almost free from contamination and other types of wastes<sup>8</sup>.</li> </ul>	
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<sup>5</sup> In this respect, international and national specifications may offer a point of reference.

<sup>6</sup> Post-consumer wastes are excluded from this entry.

<sup>7</sup> Recycling/reclamation of organic substances which are not used as solvents (R3 in Annex IV B) or if needed, temporary storage limited to one operation provided that it is followed by operation R3, and evidenced by contractual or relevant official documentation.

<sup>8</sup> In this respect, international and national specifications may offer a point of reference.


## ANNEX B

**PLASTIC WASTES CLASSIFIED UNDER HS CODES CONTROLLED BY  
CCMD ( BASEL CONVENTION )**

HS CODE	ITEM DESCRIPTION	PRODUCT CODE	UNIT
39151010	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYETHYLENE (PE) FOAM	PCTWCB033	TNE
39151010	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [ <i>*PREDOMINANTLY POLYETHYLENE (PE) FOAMS</i> ]	PCTWCB046	TNE
39151090	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYETHYLENE (PE)	PCTWCB033	TNE
39151090	MIXED PLASTIC WASTES CONSISTING ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET) (EXCLUDING FOAMS) [ <i>*PREDOMINANTLY POLYETHYLENE (PE)</i> ]	PCTWCB041	TNE
39152010	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYSTYRENE (PS) FOAM	PCTWCB034	TNE
39152010	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [ <i>*PREDOMINANTLY POLYSTYRENE (PS) FOAMS</i> ]	PCTWCB046	TNE
39152090	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYSTYRENE (PS)	PCTWCB034	TNE
39152090	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [ <i>*PREDOMINANTLY POLYSTYRENE (PS)</i> ]	PCTWCB046	TNE
39153010	SINGLE STREAM HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYVINYL CHLORIDE (PVC) FOAM	PCTWCB044	TNE
39153010	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [ <i>*PREDOMINANTLY POLYVINYL CHLORIDE (PVC) FOAMS</i> ]	PCTWCB046	TNE
39153090	SINGLE STREAM HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYVINYL CHLORIDE (PVC)	PCTWCB044	TNE
39153090	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [ <i>*PREDOMINANTLY POLYVINYL CHLORIDE (PVC)</i> ]	PCTWCB046	TNE
39159010	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYETHYLENE TEREPHTHALATE (PET)	PCTWCB037	TNE
39159010	MIXED PLASTIC WASTE CONSISTING ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET) (EXCLUDING FOAMS) [ <i>*PREDOMINANTLY POLYETHYLENE TEREPHTHALATE (PET)</i> ]	PCTWCB041	TNE
39159020	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYPROPYLENE (PP)	PCTWCB035	TNE
39159020	MIXED PLASTIC WASTE CONSISTING ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET) (EXCLUDING FOAMS) [ <i>*PREDOMINANTLY POLYPROPYLENE (PP)</i> ]	PCTWCB041	TNE

39159030	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYCARBONATES (PC)	PCTWCB038	TNE
39159040	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYVINYL ACETALS	PCTWCB040	TNE
39159050	SINGLE STREAM PLASTIC WASTE CONSISTING OF ONLY UREA FORMALDEHYDE RESINS, ONLY PHENOL FORMALDEHYDE RESINS AND ONLY MELAMINE FORMALDEHYDE RESINS	PCTWCB042	TNE
39159090	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY ACRYLONITRILE BUTADIENE STYRENE (ABS)	PCTWCB036	TNE
39159090	SINGLE STREAM NON-HALOGENATED PLASTIC WASTE CONSISTING OF ONLY POLYETHERS	PCTWCB039	TNE
39159090	SINGLE STREAM PLASTIC WASTE CONSISTING OF OTHER NON-HALOGENATED POLYMERS (EXCLUDING POLYETHYLENE (PE), POLYSTYRENE (PS), POLYPROPYLENE (PP), ACRYLONITRILE BUTADIENE STYRENE (ABS), POLYETHYLENE TEREPHTHALATE (PET), POLYCARBONATES (PC) AND POLYETHERS)	PCTWCB040	TNE
39159090	SINGLE STREAM PLASTIC WASTE CONSISTING OF ONLY EPOXY RESINS, ONLY ALKYD RESINS AND OTHER CURED RESINS	PCTWCB042	TNE
39159090	SINGLE STREAM FLUORINATED PLASTIC WASTE CONSISTING OF ONLY PERFLUOROETHYLENE/PROPYLENE (FEP) (EXCLUDING POST-CONSUMER WASTES), ONLY TETRAFLUOROETHYLENE/PERFLUOROALKYL VINYL ETHER (PFA) (EXCLUDING POST-CONSUMER WASTES), ONLY TETRAFLUOROETHYLENE/PERFLUOROMETHYL VINYL ETHER (MFA) (EXCLUDING POST-CONSUMER WASTES), ONLY POLYVINYLFLUORIDE (PVF) (EXCLUDING POST-CONSUMER WASTES) AND ONLY POLYVINYLIDENEFLUORIDE (PVDF) (EXCLUDING POST-CONSUMER WASTES)	PCTWCB043	TNE
39159090	SINGLE STREAM PLASTIC WASTE CONSISTING OF HALOGENATED POLYMERS (EXCLUDING FLUORINATED POLYMERS PERFLUOROETHYLENE/PROPYLENE (FEP), TETRAFLUOROETHYLENE/PERFLUOROALKYL VINYL ETHER (PFA), TETRAFLUOROETHYLENE/PERFLUOROMETHYL VINYL ETHER (MFA), POLYVINYLFLUORIDE (PVF), POLYVINYLIDENEFLUORIDE (PVDF)) OR POST-CONSUMER FLUORINATED PLASTIC WASTES	PCTWCB045	TNE
39159090	ALL MIXED PLASTIC WASTES (EXCLUDING MIXED PLASTIC WASTES CONSISTING OF ONLY POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)) AND FOAMS [*PREDOMINANTLY NOT POLYSTYRENE (PS), POLYVINYL CHLORIDE (PVC), POLYETHYLENE (PE), POLYPROPYLENE (PP) AND/OR POLYETHYLENE TEREPHTHALATE (PET)]	PCTWCB046	TNE
39159090	SINGLE STREAM OR MIXED PLASTIC WASTES, FOAMS AND RESINS THAT CONTAIN OR MIXED WITH OTHER WASTES	PCTWCB047	TNE

**Note:**

- 1)  New HS Codes updated as at 20 Jun 2022.