

1. Need to draft the legislative act

Annotation (*ex ante*) title

Initial impact (*ex ante*) assessment report (annotation) of the draft legislative act “Procedure for applying the criteria for discontinuing the status of ash waste from wood incineration plants”

1.1. Legal basis

Rationale for drafting

Ministry / Institutional Initiative

Description

The draft Cabinet of Ministers Regulation “Procedure for applying the criteria for discontinuing the status of ash waste from wood incineration plants” (hereinafter, the draft regulation) has been developed on the initiative of the Ministry of Environmental Protection and Regional Development (hereinafter, VARAM).

1.2. Objective

Description of the objective

The draft regulation aims to ensure a significant reduction in the amount of waste to be disposed in municipal waste landfills (hereinafter, MWL) by establishing criteria for termination of applying the waste status of wood ash from wood incineration plants for use in the construction of roads and earth walls that serve as noise absorption elements, and for the production of cement, concrete, potash and caustic potash.

Date of entry into force

According to the regular procedure

1.3. Current situation, problems and solutions

Current situation

Article 4(3) of the Law on waste management (hereinafter – LWM) provides that waste, if it complies with the criteria laid down in the legislation of the European Union regarding termination of the waste stage or the criteria laid down by the Cabinet for termination of the waste stage and if materials obtained from it, which will be used for the production of the final product, are to be regarded as secondary raw materials. If the recycling of waste results in a material that is not considered a secondary raw material, it is considered waste. Due to the increased use of solid biomass, mainly wood, in heat production, the amount of generated ash is also increasing. This ash is disposed as waste in MWL, as the ash from wood incineration

plants has no criteria for discontinuing the waste status either at the national or the European Union (hereinafter, the EU) level.

Problems and solutions

Description of the problem

As according to the EU waste management objectives the share of municipal waste disposed in MWL should not exceed 10% of the total municipal waste by 31 December 2035, the ash generated during the production of heat energy requires a regulatory framework on the procedure for determining the compliance of this ash with the criteria for discontinuing the waste status. Development of such normative framework will also improve the waste management system and facilitate both the manufacture of secondary raw materials and products made from the secondary raw materials in Latvia.

Description of the solution

The draft regulation was prepared by VARAM that relied on the conclusions and proposals from the evaluation performed by the Latvian Waste Management Association “Establishing the final status of wood incineration ash as a recyclable material (No. 1-08/81/2019). Expert evaluation”. The evaluation assessed the use of secondary raw materials produced from this waste in agriculture, forestry and construction solutions. In the evaluation, the wood incineration equipment of district heating plants was considered the source of the wood incineration ash. As in practice there are other entities that generate wood incineration ash in the course of their economic activity, such as processing plants, the only condition for the origin of the collected ash, as defined in the draft regulation, is that this ash must originate from wood incineration plants. The draft regulation provides for a procedure for the application of the criteria for discontinuing the status of wood ash derived from wood incineration plants for use as a raw material for the production of technical potassium carbonate (potash) and technical potassium hydroxide (caustic potash), and as a binder during the production of construction materials, as well as in the construction of road and earth walls that serve as sound absorbing elements, and the use of the ash as a cementing agent for soil mixtures or as an auxiliary material for stabilising the earth foundation of roads. Ash collected from wood incineration plants shall comply with the waste classification code 100101 (heavy ash, slag and soot that do not belong to class 100104) laid down in the Annex to Cabinet Regulation No. 302 of 19 April 2011 “Regulations Regarding Waste Classification and Properties Rendering Waste Hazardous”, as well as volatile ash captured by air treatment plants of wood incineration plants, and a mixture of these two types of ash. As ash should both be processed and is also the product of processing, the draft regulation uses two terms: collected ash and produced ash. Collected ash is the ash collected from incineration plants that has not yet undergone quality checks and should be classified as waste. On the other hand, the produced ash is ash that has undergone quality checks and, accordingly, should be considered a secondary raw material. 1.3.1. Use of the

produced ash Section 6.1.1 of the Waste Management Law stipulates that the Cabinet shall determine the procedures for the application of criteria for by-products and discontinuation of the waste status. Cabinet Regulation No. 302 of 19 April 2011 “Regulations Regarding Waste Classification and Properties Rendering Waste Hazardous” lays down, *inter alia*, the criteria for discontinuing the waste status (Paragraph 1.4), as well as the procedure for applying the criteria for by-products and for discontinuing the waste status (Paragraph 1.5). Paragraph 6 of that regulation stipulates: “6. A substance or object shall not be classified as waste if recovery (also processing) of the substance or object has been completed and it concurrently conforms to the following criteria: 6.1. it is intended to use the substance or object for a specific purpose; 6.2. there is a demand for such substance or object on the market; 6.3. the substance or object conforms to the technical requirements laid down in laws and regulations for further use of such substance or object and the requirements for the relevant substance or object; 6.4. the use of the substance or object does not cause adverse effect on the environment and human health.” Considering the above, pursuant to the mandate of the law the draft regulation establishes the procedure for discontinuing the waste status of wood ash from wood incineration plants, and establishes the uses of secondary raw materials (produced ash). The draft regulation provides for three uses of the produced ash: 1) ash used during the construction of roads or earth walls that serve as sound-absorbing elements; 2) ash used as a binder during the production of construction materials (cement or concrete); 3) ash used during the production of technical potassium carbonate (potash) or technical potassium hydroxide (caustic potash) to manufacture products of economic relevance, including in agriculture. The draft regulation does not establish additional uses of the produced ash in forestry and agriculture as a liming material. Collected ash may be registered as a liming material pursuant to Cabinet Regulation No. 506 “Regulations Regarding the Identification, Quality Conformity Assessment, and Sale of Fertilisers and Substrates” of 1 September 2015 (hereinafter, Regulation No. 506). As a result, the framework laid down in the draft regulation (establishment and implementation of a quality check system, etc.) is not binding for these uses. The producer of ash reserves the right to freely choose how to dispose of the ash produced in wood incineration plants, i.e., 1) to transfer it to a recycler for uses in the scope of these provisions or, if the producer is also the recycler, to perform quality checks pursuant to Annex 1 to this regulation; 2) to register the collected ash pursuant to Regulation No. 506; 3) to transfer the ash to a waste manager as waste. Note that any material produced from waste may become a source of pollution due to incorrect processing or use. Thus, physiochemical testing to assess the quality of the collected ash is mandatory before it can be considered a material that is no longer waste, i.e. when the waste has ceased to be waste. The pH of the collected ash fluctuates between 11.7 and 13.1, thus, the collected ash may have hazardous properties as indicated in Commission Regulation (EU) No 1357/2014 of 18 December 2014 replacing Annex III to Directive 2008/98/EC of the European Parliament and of the Council on waste and repealing certain Directives, namely, it may classify as having

the code H4 “irritant” (non-corrosive substances and preparations which may cause inflammation due to immediate, prolonged or repeated contact with the skin or mucous membrane) or the code H5 “harmful” (substances and preparations which, if inhaled, ingested or absorbed through the skin, may pose a specific health risk). In view of the above, the recycler must ensure a safe working environment for handling this type of waste, and the classification of the produced ash shall be performed pursuant to Article 4(1) of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. The substances extracted from produced ash are in the scope of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), and establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (hereinafter, Regulation No 1907/2006), thus, a recycler producing or importing more than one tonne of substances extracted from the produced ash such as potassium hydroxide (KOH) for the production of concrete must notify the European Chemicals Agency (ECHA) about it pursuant to Article 7(1).

1.3.2. Conditions for discontinuing the waste status An economic operator which manages the ash produced in incineration plants up to the stage when the produced ash meets all criteria for discontinuing the waste status in the draft regulation shall be called a recycler. It is a new entity in the current ash management system for the production of heat energy, which acts as an intermediary between the producer and the buyer of the produced ash. The producer is not bound by the requirements laid down in this regulation on the production of secondary raw materials, such as the establishment and implementation of a quality check system. At the same time, the draft regulation does not prohibit the producer of ash from becoming a recycler, if the producer fulfils all requirements for recyclers. Thus, a producer of ash, which also acts as a recycler, has a dual function in this system and does not require an intermediary to cooperate with the buyer of the produced ash. Accordingly, the producer of ash, if it also becomes a recycler of ash, is no longer obliged to return the collected ash to another recycler of ash or a waste manager. The criteria for discontinuing the waste status set out in Annex 1 to the draft regulation include quality requirements for the ash collected from incineration plants, ash subject to the criteria for discontinuing the waste status (produced ash), and self-control criteria that apply to the quality of collected ash and the quality of the process for verifying the physiochemical properties of the produced ash. The draft regulation does not lay down the amount of collected ash that is required to enable the processor to analyse the physiochemical properties. Due to the origin of the produced ash, Annex 1 to the draft regulation also lays down a threshold value for the specific radioactivity of the produced ash: 1 000 Bq/kg. This value is in

line with the value set out in Paragraph 16 of Cabinet Regulation No. 576 “Requirements for Protection against Ionising Radiation Caused by the Radionuclide Caesium-137 Content in Wood Imported into Latvia from another Country”. Acceptable limits are not applied to the produced ash, as according to the conclusions of 2022 study by the Ministry of Environment of Estonia “*Biomassi tuhkades sisalduvate dioxyinide ja furaanide uuring*” (translated from Estonian: “Research of dioxins and furans in biomass ash”) the concentration of dioxins in such ash does not exceed the maximum concentration limits for polychlorinated dibenz-p-dioxins set out in Annex IV to Commission Regulation (EU) 2019/1021 of 20 June 2019 on persistent organic pollutants. If the management of collected ash and the verification of compliance with the criteria for discontinuing the waste status laid down in the draft regulation is to be performed by an economic operator that has not yet engaged in the recycling of waste, the operator shall receive a permit for polluting activities pursuant to the Cabinet Regulation No. 1082 of 30 November 2010 “Procedures by Which Polluting Activities of Category A, B and C Shall Be Declared and Permits for the Performance of Category A and B Polluting Activities Shall Be Issued”, and submit to the State Environmental Service a financial collateral pursuant to the Cabinet Regulation No. 134 of 25 February 2021 “The Procedure for Application of Financial Collateral to Waste Management Activities”. The draft regulation lays down an obligation for recyclers to create and manage a quality management system to ensure the traceability of the produced ash and quality inspection process. The quality management system is a set of actions that ensure compliance of the produced ash with the criteria for discontinuing the waste status laid down in the draft regulation. The draft regulation currently does not provide for the certification of the quality management system not to impose a disproportionate burden on recyclers. At the same time, the draft regulation does not prohibit the certification of the implemented quality management system, thus, confirming to the buyers of the produced ash that the company complies with the internationally recognised standards. The quality management system set out in Paragraph 11 of the draft regulation shall be implemented and maintained by the recycler, like it has been laid down in the Cabinet Regulation No. 682 of 13 November 2018 “Procedure For Terminating The Application Of Waste Status To Rubber Materials Derived From End-Of-Life Tyres” (hereinafter, Cabinet Regulation No. 682), Cabinet Regulation No. 317 of 24 May 2022 “Procedure For Terminating The Application Of Waste Status To Chips, Shavings And Dust Obtained From Wood Packaging Or Certain Types Of Wood Construction Waste” (hereinafter, Cabinet Regulation No. 317), and Cabinet Regulation No. 571 of 13 September 2022 “Procedure For Terminating The Application Of Waste Status To Material Derived From Biodegradable Waste” (hereinafter, Cabinet Regulation No. 517). The draft regulation stipulates that the recycler shall analyse the collected ash in accordance with the implemented quality management system in testing laboratories accredited with a national accreditation body pursuant to the laws and regulations on the assessment, accreditation and supervision of conformity assessment bodies, or in laboratories accredited in other

Member States of the European Union, Türkiye or members of the European Economic Area (hereinafter, the EEA). As Türkiye is an EUROLAB (*European Federation of National Associations of Measurement, Testing and Analytical Laboratories*) partner, but it is neither an EU Member State, nor an EEA country, it has been indicated separately. If the recycler has a certified and appropriate measurement equipment and a qualified specialist to work with this measuring equipment, the draft regulation allows the recycler to collect representative samples and to carry out the necessary checks in the framework of the quality management system, thus shortening the quality check period and decreasing the total inspection costs. The draft regulation will ensure that the ash generated in the wood incineration plants is safe for the environment and the human health. The draft regulation obliges the recycler to confirm that the ash management and the produced ash comply with the draft regulation and, as a result, the ash is not considered waste. To certify this, the processor shall prepare a declaration of conformity for each batch of secondary raw materials (the totality of shipment items agreed between the recycler and the purchaser of the secondary raw material) to be sold on the market (Annex 2 to the draft regulation). The batch size of secondary raw materials (shipment unit) shall be determined by the recycler. The declaration of conformity shall be electronic and identifiable, e.g. linked to a bar code such as a code (*Quick Response Code*) stamped on each batch of secondary raw materials (shipment unit) during its transportation, thus ensuring that the waste control body, i.e., the State Environmental Service, is able to verify compliance of the ash with the criteria for discontinuing the waste status laid down in the draft. The draft regulation stipulates that the recycler shall keep the declaration of conformity for three years after the date of collection of the particular batch of secondary raw materials (shipment unit) and shall produce it at the request of the State Environmental Service. The batch size of the collected ash (shipment unit) shall be determined by the recycler. The records on the collected and produced ash shall be maintained pursuant to the laws and regulations on the official forms for environmental statistics as set out in Cabinet Regulation No. 113 of 18 February 2021 “Accounting Procedures For Waste And Their Shipment”, for example, by using the forms offered in the State Information System for Waste Shipments (APUS). According to this regulation, the recycler shall complete the form “Form No. 3. Waste. Report on waste”. The draft regulation stipulates that the recycler may only export the produced ash to other countries if the authority of the country of destination that is competent to decide on trans-border waste shipments accepts the criteria for discontinuing the waste status set out in Annex 1 to the draft regulation. If the competent authorities of origin and destination cannot agree on its classification, the recycler shall apply Article 28(1) of Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste.

1.3.3. Requests for personal data and grounds The draft regulation stipulates that the processor shall indicate the personal data of the representative in the declaration of compliance, i.e. name, surname and position (Paragraph 12.5 of the draft regulation and Annex 2). Such information is necessary

for the State Environmental Service to identify, in the event of an inspection, the person who prepared the respective declaration of compliance and thus is able to provide information on the produced ash. Having assessed the need to request personal data from the recycler, it was concluded that the data to be indicated in the declaration of compliance are necessary and that their scope is proportionate to implement the required control functions of the controlling authority. If the respective individual is not available during the inspection of the State Environmental Service, the recycler shall provide information about a contact who can provide the required information to the representatives of the State Environmental Service on the respective declaration of compliance. The obligation to store personal data to identify persons for the purposes of producing ash, checking its quality and monitoring the sale of the produced ash is also included in Paragraphs 10 and 14 of the draft regulation. The time limits for the storage of personal data for the above activities shall be similar to those applicable to the storage of personal data laid down in Cabinet Regulation No. 682, Cabinet Regulation No. 317 and Cabinet Regulation No. 517. The collected personal data will be stored for three years after the respective inspection and subsequently destroyed pursuant to the Law on Archives.

1.3.4. Exceptions The draft regulation does not apply to other types of bio-fuels such as incineration ash from solid waste, sewage sludge, waste water sludge from paper mills and manure. The provision of the draft regulation on the introduction of a quality management system does not apply to buyers of the produced ash buying ash produced in Latvia, as the quality of this ash will be certified by the recycler pursuant to the draft regulation. The produced ash is not subject to the hazard limits laid down in Regulation No. 1907/2006.

1.3.5. Procedure for entry into force, reporting and impact on information and communication technology systems The draft regulation shall enter into force pursuant to Section 7.2 of the Law on Official Publications and Legal Information, i.e. on the day after its promulgation, as the current regulatory framework does not set a specific deadline for the implementation of these requirements. As the draft regulation is considered a draft technical regulation, the European Commission shall be informed of it pursuant to Instruction No. 1 of the Cabinet of Ministers of 23 February 2010 “Procedure on Provision of Information on Draft Technical Regulations by Governmental Institutions”. The draft regulation does not provide for the implementation of new information and communication technology systems or the improvement of current systems.

Have alternative options been assessed?

Yes

Description

No alternative solutions are provided, as at the time of drafting the National Waste Management Plan for 2021–2028 it was concluded that without approved national criteria for discontinuing the waste status it will be burdensome for ash recyclers to prove that the produced ash is no longer waste and that the law on waste management

no longer applies to them, as well as to sell the produced ash as a secondary raw material outside the Latvian market.

Has the proportionality of the requirements and the costs and benefits been assessed?

Yes

Description

The requirements and the potential costs versus benefits are reasonable, as the recycler of ash will recover the invested fund by selling it on the market. The costs of disposal of the collected ash in MWL will also be saved, thus reducing the total costs of waste management, as well as extending the use of the current MWLs.

1.4. Evaluations/studies justifying the need for the legal act

1.5. Ex post evaluation

Will be performed?

No

1.6. Other information

In the future, new products that require ash for their production may be added to the range of products defined in the regulation, when they appear on the market.

2. Impact of the draft legislation on economic development and administrative burden

Does the draft affect this area?

Yes

2.1. Societal groups affected or likely to be affected by the legal framework

Natural persons

Society as a whole

Description of the impact

The draft regulation will have a positive impact on the Latvian economy as:

- 1) the total amount of waste to be disposed in MWL will decrease and the amount of waste recycling will increase;
- 2) the length of use of MWL will increase;
- 3) both the production of secondary raw materials and the production of products made from secondary raw materials will be encouraged.

No additional administrative burden is created by these draft Regulations.

Legal entities

Waste managers

Description of the impact

The draft regulation sets out conditions for recyclers who will manage the wood ash generated by producers of heat. These recyclers will process the collected ash pursuant to Paragraph 2 of this regulation, thus giving the ash the status of a secondary raw material. As a result, ash no longer has the waste status and will not be subject to the restrictions imposed on waste operations. As a result, the amount of waste to be disposed in MWL will be reduced and the amount of the generated secondary raw material will increase.

2.2. Economic impact of the legal framework

Does the draft affect this area?

No

2.3. Assessment of administrative costs

Does the draft affect this area?

No

2.4. Assessment of compliance costs

Does the draft affect this area?

No

3. Impact on the national and local government budgets

Does the draft affect this area?

No

Other information

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4. Impact of the draft legislation on the current legal framework

Does the draft affect this area?

No

4.2. Other information

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5. Compliance of the draft regulation with international obligations of the Republic of Latvia

Does the draft affect this area?

Yes

5.1. Obligations to the European Union

Is it relevant?

Yes

CELEX number of EU legislation

32006R1013

Date, issuing body, number, type and title of the EU act

Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste.

Description

Article 28(1) of Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste shall apply if the competent origin and destination authorities cannot agree on the classification of wood ash.

EU CELEX number

32008R1272

Date, issuing body, number, type and title of the EU law

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.

Description

Article 4(1) of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 applies to the classification of ash.

5.2. Other international obligations

Is it relevant?

No

5.3. Other information

Description

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5.4. Table 1: Compliance of the draft legislation with EU legislation

Date, issuing body, number, type and title of the relevant EU act	Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste.		
EU TA Article number	Project unit taking over or implementing A	Taken over in whole or in part	Does B provide for stricter requirements and justification
A	B	C	D
Article 28(1) of Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste	Paragraph 19 of the draft regulation	Transposed in full	Paragraph 19 does not impose stricter requirements.
Has the Member State used discretionary rights to transpose or implement certain provisions of EU law? Why?	The draft Regulations are without prejudice to this area.		
Obligation to notify the EU institutions and EU Member States in accordance with the laws and regulations governing the provision of information on draft technical regulations, the granting of state aid and draft financial regulations (in relation to monetary policy)	Since the draft regulation is to be considered a draft technical regulation, information will be provided to the European Commission in accordance with the procedures laid down in Cabinet Regulation No. 1 of 23 February 2010 on the procedure by which national regulatory authorities provide information on draft technical regulations.		
Other information	-		
Date, issuing body, number, type and title of the relevant EU law	Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.		
EU TA Article number	Project unit taking over or implementing A	Taken over in whole or in part	Does B provide for stricter requirements and justification

A	B	C	D
Article 4(1) of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006	Annex 1, Chapter II, Paragraph 3 of the draft regulation	Transposed in full	Annex 1, Chapter II, Paragraph 3 of the draft regulation does not impose stricter requirements.
Has the Member State used discretionary rights to transpose or implement certain provisions of EU law? Why?	The draft Regulations are without prejudice to this area.		
Obligation to notify the EU institutions and EU Member States in accordance with the laws and regulations governing the provision of information on draft technical regulations, the granting of state aid and draft financial regulations (in relation to monetary policy)	-		
Other information	-		

6. Institutions involved in developing the draft and the public participation process

Public participation does not apply to this draft legislative act

No

6.1. Bodies involved in drafting the regulation

National and local government institutions

State Environmental Service of the Republic of Latvia

Non-governmental organisations

No

Other

No

6.2. Ways of organising public participation

Type

Public consultation

Link to results of public participation

https://tapportals.mk.gov.lv/public_participation/a99a05d3-4e7c-4e7b-a6cd-032be7bf6d5b

6.3. Results of public participation

During the public consultation, a proposal from the Employers' Confederation of Latvia was received; it has been taken into account by supplementing subsection 1.3.1. of the annotation to the draft regulation "Use of generated ash".

6.4. Other information

Other information

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7. Implementation of the draft legal act and its impact on bodies

Does the draft affect this area?

Yes

7.1. Bodies involved in implementing the draft

Institutions

State Environmental Service of the Republic of Latvia

7.2. Assessment of administrative costs

Does the draft affect this area?

No

7.3. Assessment of compliance costs

Does the draft affect this area?

No

7.4. Impact of the draft on administrative functions and institutional structures

Impact	Yes/No	Explanation
1. A new institution will be created	No	-
2. A institution will be dissolved	No	-
3. A current institution will be reorganised	No	-
4. Functions and tasks of an institution will change (will be extended or narrowed)	No	-
5. Efficiency of internal processes will be improved in an institution	No	-
6. Internal processes in an institution will be digitized	No	-
7. Internal processes in an institution will be optimized	No	-
8. Other information	No	-

7.5. Other information

Other information

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8. Horizontal impacts

8.1. Impact of draft on the legal framework

8.1.1. On the development of public services

Does the draft affect this area?

No

8.1.2. On the development of national and local government information and communication technologies

Does the draft affect this area?

No

8.1.3. On the implementation of information society policy

Does the draft affect this area?

No

8.1.4. On the indicators of the National Development Plan

Does the draft affect this area?

No

8.1.5. On territorial development

Does the draft affect this area?

No

8.1.6. On environment

Does the draft affect this area?

Yes

Description

By reducing the amount of wood ash waste, the amount of waste disposed in municipal waste landfills will be reduced and the use of municipal waste landfills will be extended.

8.1.7 On climate neutrality

Does the draft affect this area?

No

8.1.8. On the social situation of the population

Does the draft affect this area?

No

8.1.9. On equal opportunities and rights of persons with disabilities

Does the draft affect this area?

No

8.1.10. On gender equality

Does the draft affect this area?

No

8.1.11. On health

Does the draft affect this area?

No

8.1.12. On human rights, democratic values and the development of civil society

Does the draft affect this area?

No

8.1.13 On data protection

Does the draft affect this area?

Yes

Description

The processor shall provide information on employees (name, position) responsible for each step of the ash production and quality testing process.

8.1.14. On diaspora

Does the draft affect this area?

No

8.1.15. On regulation of professions

Does the draft affect this area?

No

8.1.16. On the best interests of the child

Does the draft affect this area?

No

8.2. Other information

Other information

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