

Waste management plans for enterprises in Ukraine

On 26 November 2024, the new Procedure for the Development of Waste Management Plans (hereinafter – the "Procedure"), approved by Order No. 1003 of the Ministry of Environmental Protection and Natural Resources of Ukraine dated 9 August 2024, came into force as part of the reform of the waste management system in Ukraine.

The Procedure provides for the improvement of mechanisms for preventing and reducing waste generation, mitigating the negative effects of waste management activities, facilitating the preparation of waste for reuse, recycling and recovery in order to prevent its negative impact on people's health and the environment, as well as for controlling the implementation of these measures and monitoring the results of their implementation in the field of management.

Under the new Procedure, a waste management plan is developed for 5 years, approved by an enterprise order, and must contain the following sections:

- introductory part;
- description of the enterprise, institution or organisation;
- analysis of the current state of the waste management system at the enterprise, institution or organisation;
- planning of the waste management system at the enterprise, institution or organisation;
- monitoring of the waste management plan implementation.

Enterprises that generate waste shall develop a waste management plan with the following information:

- the 'introductory part' section shall specify the regulatory legal acts pursuant to which the waste management plan is developed and its main purpose; volumes, place of waste generation for the past 5 years, indicating the code and type of waste defined in accordance with the National Waste List, whereby the classification of waste generated before 2024 should correspond to the reporting and accounting documentation of the enterprise, institution or organisation for the relevant period;
- the 'enterprise, institution or organisation characteristics' section shall contain a general description of the activities of the enterprise, institution or organisation, available production facilities and location, average annual number of staff and average annual production volumes for the year preceding the plan preparation; description of the waste collection system for each type of waste;
- in the 'analysis of the current state of the waste management system at the enterprise, institution or organisation' section, the following

- shall be indicated: description of the method of transportation with indication of the waste treatment facilities to which the waste is transported;
- information on the places of waste storage prior to its transfer to waste treatment facilities.

in the 'planning of the waste management system at the enterprise, institution or organisation' section, the following shall be specified: projected volumes of waste generation for 5 years, calculated in accordance with the specific and limit values of waste generation in technological processes determined for the year of development of the new waste management plan, indicating the code and type of waste according to the National Waste List;

description of the planned waste collection system for each type of waste;

description of the planned method of transportation and identification of waste treatment facilities to which the waste will be sent;

measurable targets for the prevention and reduction of waste generation and appropriate actions to achieve them;

measures to raise awareness of the responsibilities and knowledge required by the relevant job descriptions, compliance with occupational health and safety rules and regulations, sanitary and hygiene requirements, fire and industrial safety requirements, and waste management;

sources of funding for the implementation of the planned activities.

the 'monitoring of the waste management plan implementation' section specifies the target indicators for plan implementation.

Waste management companies shall develop a waste management plan containing the following information:

- the 'introductory part' section shall specify the regulatory legal acts for the implementation of which the waste management plan is developed and the plan's main purpose; permits for waste treatment operations and/or licences for hazardous waste management activities;
- the 'characteristics of the enterprise, institution or organisation' section shall contain a general description of the activities of the enterprise, institution or organisation, available production facilities and location, average annual number of staff and average annual production volumes for the previous year; availability of material and technical facilities for waste treatment operations and the code of the planned operation;
- the 'analysis of the current state of the waste management system at the enterprise, institution or organisation' section contains information on: the volume of waste treated for each operation for the past 5 years, indicating the code and type of waste in accordance with the National Waste List, whereby the classification of waste treated before 2024 must comply with the reporting and accounting documents of the enterprise, institution and organisation for the relevant period;

- a list and description of technological processes used for waste treatment operations;
- places of waste storage prior to treatment.

the 'planning of the waste management system at the enterprise, institution or organisation' section defines: projected volumes of waste treatment for 5 years, indicating the code and type of waste according to the National Waste List, and operations with them;

projected volumes of waste generation as a result of treatment operations (in accordance with specific and limit values of waste generation in technological processes determined for the year of development of the new waste management plan);

further treatment of waste generated as a result of treatment operations and/or ensuring its disposal in an environmentally friendly manner;

a list of measures aimed at minimising the generation of waste during its treatment;

a list of measures to raise employees' awareness of their responsibilities and knowledge, which are required by their respective qualification characteristics, to comply with the established environmental, sanitary and epidemiological, labour protection, fire and industrial safety requirements;

sources of financing for the implementation of the planned activities.

the 'monitoring of the waste management plan implementation' section specifies the target indicators for the plan implementation.

For waste disposal facilities that dispose of waste at landfills, the following shall be additionally specified:

- description of hydrological and hydraulic characteristics of the landfill site;
- information on the projected volume of waste disposal and the estimated life of the landfill;
- information on the existence of a landfill control and monitoring programme.

If the period of the plan's validity includes the landfill closure period, the list of measures to organise landfill reclamation and post-closure care shall be additionally specified.

For a facility where thermal treatment of waste is planned, information on the availability of a facility monitoring plan shall be additionally indicated.

The waste management plan may, if necessary, be supplemented with the relevant annexes in the form of tables and graphic materials detailing the required information.