

Q&A Transcript

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1. An operator enquired whether the first account in TracesNT has to be strictly of the Managing Director/CEO or other legal representative of the operator.

ERA replied that each competent authority is responsible for the registration of the operator and the first master user. A competent authority will verify whether the operator exists and if the master user is legally authorized to represent the operator. In view that users on behalf of operators must authenticate certain actions, which is legally equivalent to signing documents, certain actions can only be performed by authorized legal representatives on behalf of the operator.

2. An operator enquired whether DIWASS will enable registration of one master user with the possibility of creating additional users.

ERA replied that each operator must have at least one master user, who will then have the right to appoint other users on behalf of the operator including other master users.

3. An operator enquired whether the penalties associated with errors in DIWASS reporting are known.

ERA replied that applicable penalties are normally stipulated in the national laws of the countries concerned.

4. An operator enquired whether ERA is informed about how individual countries will develop their own national portals to connect to DIWASS.

ERA replied that as explained during the information session held in February 2026, Malta will not operate a local interconnected system. Operators will access DIWASS directly through the EU web-based interface (GUI). In the coming weeks the European Commission will publish information about access options by other competent authorities.

5. An operator enquired when it will be possible to start using the system to get familiar with it before going live.

ERA replied that the link to access the DIWASS test environment will be circulated in the next days as a follow-up to this first demonstration session. This will provide an opportunity to operators to familiarize themselves with DIWASS before it becomes mandatory.

6. An operator enquired whether the when it will be possible to start using the system

ERA Replied that the link for the testing environment will be provided immediately after the session, whilst the definitive version of the system will go live on 21st May 2026

7. An operator enquired whether the master user can be the operator as well.

ERA confirmed that anyone can be appointed as master user as long as they are legally authorized to represent an operator. If a user is not authorized to legally represent an operator, any actions/tasks requiring authentication in DIWASS cannot be carried out by that user.

8. An operator enquired how an employee within a company can register on DIWASS in order to operate the system after the employer has created the main account, and whether such a registration must be approved by ERA beforehand.

ERA replied that instruction manuals will be shared to guide operators through the registration process. First, the employer must create the main account. Once this main account has been created and approved by ERA, the other employees may then create their own individual accounts. Each employee must have a unique EU Login account. After creating the EU Login accounts, employees must submit a request for authorization to be linked to the company's main account. These requests will be approved directly by the employer. ERA will only approve the main user account, which will as the first appointed master user. The employer may then designate additional master users within the company if needed.

9. An operator enquired whether a British company holding a valid permit to ship green-listed waste from several EU countries may register as an operator within DIWASS.

ERA confirmed that third-country operators can register on DIWASS. However, since the United Kingdom is no longer part of the European Union, certain additional considerations apply. The first step is to determine whether the designated competent authority in the country in which the operator is based has confirmed that they will use DIWASS. If the responsible competent authority has decided to register in DIWASS, the operator may register directly on DIWASS and select the appropriate national competent authority to approve the registration. If the United Kingdom has

opted not to use DIWASS, the operator may still register on the system. However, in this case the operator must designate a competent authority within the European Union to approve the registration request. This should be the competent authority which is involved in the shipments of waste that the operator intends to carry out i.e. the competent authority of import or export within the EU.

10. An operator asked for clarification on how a carrier line can use DIWASS to avoid issues with customs authorities. The operator explained that they represent a carrier line and wish to verify whether a shipper is permitted to export, or whether a consignee is permitted to import, a particular waste or scrap commodity into an EU or non-EU country. The operator also enquired whether such checks can be carried out through DIWASS

ERA replied that carriers can only view notifications which have been approved, This means that if a carrier can view a notification in which they were selected as a carrier, that notification was approved by all competent authorities concerned. This automatically serves as confirmation that all required permits, from an environmental regulation perspective are in place—both for the notifier and for the consignee, as well as for the treatment facility (in cases where the notifier and consignee are different). Information about the consents by the respective competent authorities concerned can also be viewed in DIWASS.

11. An operator enquired whether an organization that is registered with multiple competent authorities in several countries is required to create multiple DIWASS login accounts—one for each competent authority.

ERA explained that in cases where large corporations have subsidiary companies operating in different Member States, each subsidiary must be registered separately in the country where it is based. For example, if a corporation is established in a foreign country and has a subsidiary company registered in Malta, the Maltese subsidiary company must create its own separate DIWASS registration. It is possible for the profiles of both the parent corporation and its subsidiary companies to be accessed by the same authorised users, if required.

12. An operator enquired whether first master user (CEO/employer/Managing Director) can create another master user within the company? Or just slave users?

ERA confirmed that first master user can appoint both master users and also slave users.

13. An operator enquired why, when creating a new account as a new operator, the Activity Details section provides options for Importer or Transporter but does not include an option for Exporter.

ERA explained that certain sections in the registration form may not need to be completed when an operator is registering for the first time. The key requirement is that operators correctly select the relevant chapter and section of the Waste Shipments Regulation, as shown during the demonstration session. Some fields may not be applicable to operators because DIWASS forms part of the broader IMSOC (Information Management System for Official Controls) system, and several fields included in the registration interface are designed to support other IT tools that also operate using IMSOC. As a result, not all information requested by the wider system is necessary for users which are specifically registering on DIWASS. The user manuals and video demonstrations which will be circulated include clear information about which fields must be completed to enable registration on DIWASS.

14. An operator enquired whether rail carriers are expected to enter or confirm any information in DIWASS. The operator noted that it appears that they may be required to confirm the takeover of waste transport but was unsure how this should be done, since no specific carrier role could be identified in the system.

ERA explained that all users, including carriers, must be registered on DIWASS. For carriers in particular, their role within the system is important because, once a notification is approved, authentication steps must be carried out when the waste is handed over from one carrier to another upon commencement of shipments —also in line with current practices. Since there are no rail carriers based in Malta, ERA informed that rail carriers should contact their respective competent authorities in the countries in which they are based to register on DIWASS. These competent authorities will be able to guide them on how to correctly register on the system and how to address the situations described in the query. ERA confirmed that rail carriers will indeed be required to confirm the takeover of the waste transport on DIWASS.

15. An operator asked for clarification on the purpose for which carriers, such as shipping lines, are required to register on DIWASS, noting that the scope of their role was not clear.

ERA explained that all carriers—including shipping lines involved in sea transport—must register in DIWASS to be selectable in the context of a notification or Annex VII and to fulfil their responsibilities as carriers once shipments commence. The underlying procedure has not changed: carriers are still required to perform the same actions they previously carried out using the paper-based system. The only difference is that these processes will now be completed electronically through DIWASS.

16. An operator enquired whether in DIWASS, transit countries are no longer required to approve new notifications.

ERA clarified that transit countries are still required to approve notifications. This may occur either through tacit consent or written approval.

17. An operator enquired whether treatment facilities located in third countries, to which shipments are sent, are also required to register in DIWASS.

ERA explained that all operators involved in shipments of waste involving any EU Member State—irrespective whether these are located within the EU or not—must be registered in DIWASS. If an operator based outside the EU is currently engaged in shipments of waste in collaboration with a notifier based in the EU, both operators must be registered in the system be selectable in DIWASS.

18. An operator enquired whether the responsibility to ensure registration in DIWASS lies with the waste generator or owner—meaning they must encourage notifiers, shippers, and consignees to register—or whether all companies in Europe are independently obliged to register according to their respective roles.

ERA explained that every user, regardless of their specific role in waste export operations, is expected to register in DIWASS. All operators based in the EU involved in shipments of waste must complete their own registration. Third country operators are also required to register on DIWASS to participate in shipment of waste involving EU operators.

19. An operator enquired whether DIWASS provides registration options only for notifier, carrier, or treatment facility and that the actual producer, exporter, or shipper is considered to be the notifier.

ERA explained that this particular operator had not yet reached the stage where it is possible to submit an Annex VII document or a notification, because the registration is still pending. Once the operator's registration is approved and this can progress to this stage, DIWASS will allow the operator to clearly distinguish between the respective roles involved in waste shipment procedures.

20. An operator enquired what happens when an employee who previously acted as an operator or administrator leaves the company. The operator wanted to know how such a user can be removed from the system and whether that person can continue accessing DIWASS without the company's permission.

ERA explained that master users can administer all users on behalf of a particular operator. This includes the deletion of existing master users or slave users.

21. An operator enquired whether a possible situation where multiple accounts belonging to the same company are shown in DIWASS can occur.

ERA replied that as demonstrated at the beginning of the session, when a user enters the company details during the initial registration, DIWASS automatically displays any existing operators with similar information. This enables the user to determine whether the company is already registered. If the company does not appear in the list, the user may proceed with creating the new registration. Once a registration request is submitted, the authority will verify that the operator exists and that the user submitting the request is authorised to represent that operator.

22. An operator enquired whether a notifier can act both as a notifier and as a waste producer on DIWASS?

ERA confirmed that when completing the information required for an Annex VII document or a notification, DIWASS allows an operator to act both as notifier and waste producer. This functionality is intentional, as it reflects common operational practices, particularly for shipments originating from waste management facilities.

23. An operator enquired whether operators already registered on TRACES NT are still required to complete the registration process to access DIWASS.

ERA explained that operators already registered on TRACES NT must still select the relevant section/chapter of the Waste Shipment Regulation on the IMSOC platform to be able to access DIWASS. If an operator already used other IT tools on the IMSOC platform, it is necessary to select the Waste Shipment Regulation chapter. Once the appropriate changes are made to the operator's/user profile, the operator can be submit a request to obtain access to DIWASS for the consideration of the competent authority concerned. Further information about this is available in the instruction manuals and video demonstrations.

24. An operator enquired whether they have to register in DIWASS even if they only the transport waste from site of generation to port.

ERA confirmed that all carriers must register on DIWASS.

25. An operator enquired who is expected to sign as carrier in DIWASS: a legal representative of the company, or any person within the company who is responsible for the waste shipment project.

ERA clarified that certain actions/tasks on DIWASS require authentication—actions which are legally equivalent to signing documents— which shall only be carried out by authorized legal representatives on behalf of the operator. It is the responsibility of each operator to decide which employees are authorized to act on his/her behalf. ERA further explained that, in the case of large companies, such authority may be delegated. There are various formats through which such delegation can be

formalized, but ultimately it is up to each operator to determine which users are authorized to carry out actions/tasks requiring authentication on DIWASS.

26. An operator enquired whether all carriers listed by the notifier—who must be registered in DIWASS through the appropriate procedures depending on their country of origin—are required to perform data exchanges on DIWASS. The operator also enquired whether these obligations apply in situations involving multiple modes of transport and several carriers operating across the EU.

ERA explained that all carriers listed as possible carriers for a particular Annex VII or notification must be registered in DIWASS. The role of carriers on DIWASS is activated only after a notification or Annex VII document is approved. At that stage, the carrier is required to enter the information in Block 8 of the Movement Document, confirming the transfer of the waste to the subsequent carrier. This procedure mirrors current practice, the primary difference being that these confirmations will now be performed electronically through DIWASS.

27. An operator enquired what will happen to notifications for the import of waste into the EU from third countries that do not have access to DIWASS. The operator further enquired whether such notifications will be handled partly through DIWASS and partly through the current procedure of prior informed consent for third countries that are not using DIWASS.

ERA explained that, for imports of waste into the European Union from third countries, all EU competent authorities are only able to process notifications that are available on DIWASS. This means that any notification originating outside the EU which are not submitted on DIWASS must be entered in DIWASS to enable EU competent authorities to access them.

In cases where waste is imported from a third country into the EU, it is the responsibility of the EU operator—typically the consignee or, where applicable, the treatment facility—to upload the relevant documentation on DIWASS. Only once this information is available on DIWASS EU competent authorities can proceed with the processing of the notification.

28. An operator enquired how the carriers will sign the movement documents in DIWASS?

ERA replied that there will be a dedicated box in the movement form where a carrier can carry out authentication.

29. An operator enquired whether notifications/shipments must be registered in DIWASS after 21 May 2026, even if an operator already holds a valid export permit.

ERA explained that active notifications do not need to be transferred in DIWASS. As outlined in Article 85 (transitional provisions) of Regulation (EU) 2024/1157, all active notifications will remain valid until their expiry and Regulation (EC) 1013/2006 applies for such waste shipments. This also applies to pending notifications, provided that they obtain an acknowledgement from the competent authority of destination on or before 21 May 2026. Any pending notifications which are not acknowledged within this timeframe will be cancelled, and the operator must submit a new notification on DIWASS.

30. An operator enquired how an authorized user can be removed from the system when their employment is terminated, noting that this question had not yet been answered.

ERA replied that in the same section where you can authorize a user, there is also an icon to delete that specific user. Such action can only be carried out by a master user.

31. An operator enquired whether in DIWASS, the trailer operator (acting as the carrier) will be responsible for entering all required transport information in the system, while the shipping agent's role would be limited solely to acknowledging that the trailer was loaded onto the vessel. The operator further noted that ship agents are neither interested in, nor should they have access to, information about the actual shipper or supplier, as such information should remain exclusively with the trailer operator.

ERA explained that it is not familiar with operational practices performed by shipping agents, and therefore advised operators to confirm such procedural aspects directly with the relevant operators involved. However, ERA reiterated that all carriers are required to complete the necessary information in the movement document once shipment begins. ERA noted that this task will normally be performed by the carrier itself, since each carrier will have its own profile in the system, with users assigned specifically to that operator. It is therefore logical that only users belonging to the carrier's organization should be able to enter and authenticate the required information. For this reason, a shipping agent would not be able to complete such action on behalf of the carrier.

32. An operator enquired whether in DIWASS, a shipment via Annex VII can proceed only after the signed Annex VII from the previous shipment is submitted. The operator further enquired whether DIWASS will follow a similar approach—meaning that all stakeholders must complete their required actions in DIWASS before a shipper can proceed with a new export.

ERA clarified that there are no such restrictions or limits on the number of Annex VII or movements. The operator could have been referring to procedures under the prior

informed consent procedure, where such limit depends on the bank guarantee amount. ERA explained that such limitations do not apply to shipments subject to Annex VII. .

33. An operator enquired whether the graphical user interface (GUI) used by competent authorities in DIWASS will be connected to eFTI platforms, noting that some EU Member States intend to use a common eFTI/DIWASS platform for operators and carriers.

Interoperability between eFTI systems and DIWASS is explicitly anticipated and planned. However, for further information about this topic it is suggested to contact the the European Commission. ERA will be accessing the central system through the GUI.