From: TISI Thai TBT <thaitbt@tisi.mail.go.th>
Sent: mardi 15 septembre 2026 10:25
To: GROW EU-TBT
Cc: ณฐิณี; nathinee
Subject: Thailand's Comments on Notification G/TBT/N/EU/1229

Dear Colleagues in the EU-TBT Enquiry Point,

Thailand would like to thank the EU for notifying the Draft Commission Implementing Regulation laying down rules for the application of Directive 2008/98/EC of the European Parliament and of the Council as regards criteria to determine when plastic waste ceases to be waste to the WTO under Notification G/TBT/N/EU/1229.

Following a review of the notified regulation by our relevant authorities, we would like to submit the following comments for the EU's consideration.

1. We encourage the EU to consider recognizing conformity assessment results or certifications issued by competent and internationally accredited bodies in the exporting country, where the accreditation scope and level are equivalent to the EU requirements, in order to avoid assessments and reduce compliance costs.

2. We recommend that the EU provide clear and detailed guidance on the procedures, required documentation, competent authorities, and criteria for the assessment or certification of Quality Management Systems (QMS) for third-country operators, to enable operators to adequately prepare for and comply with the requirements in a clear, consistent, and non-discriminatory manner.

3. We encourage the EU to provide an adequate transition period, particularly for small and medium-sized enterprises (SMEs), to allow sufficient time to establish or upgrade quality control, traceability, testing, and documentation systems to meet the new requirements.

4. We recommend that the end-of-waste criteria, including quality and contaminants requirements, be subject to periodic review, taking into account technological developments, industry practices, and technical and economic feasibility, to ensure that the requirements remain appropriate and do not create unnecessary burdens.

We would appreciate the EU consideration of the above comments and would be grateful if you could kindly acknowledge receipt of this email.

Best regards,
Thai Industrial Standards Institute (TISI)
Thailand WTO/TBT Enquiry Point and Notification Authority