



BUREAU OF CUSTOMS

MAKABAGONG ADUANA, MATATAG NA EKONOMIYA



PROFESSIONALISM

INTEGRITY

ACCOUNTABILITY

AOCG Memo No. 400-2022

MEMORANDUM

TO : ALL DISTRICT COLLECTORS
ALL SUB-PORT COLLECTORS
ALL OTHERS CONCERNED

FROM : ATTY. EDWARD JAMES A. DY BUCO
Deputy Commissioner, AOCG

SUBJECT : TRANSBOUNDARY MOVEMENT OF SCRAP METAL IS NOT
COVERED BY AN EXPORT CLEARANCE

DATE : 11 November 2022

This is with reference to the attached letter reply of Engr. Cuñado, EMB-DENR to Ms. Dela Llana-Koval, OIC-SDA for Regulatory Group/Manager, Subic Bay Metropolitan Authority (SBMA), relative to the latter's letter with IIS Transaction No. CO-2022-038563 dated 03 October 2022, requesting confirmation from EMB-DENR that transboundary movement of scrap metal (i.e., aluminum, flakes/scrap, zinc scrap, platinum clad, 304 stainless steel scrap, recycled materials for brass, recycled materials for copper, recycled cast aluminum alloy materials, copper scrap, recycled brass, recycled aluminum) is not covered by an export clearance **(EC)**.

Accordingly, EMB-DENR confirms that the transboundary movement of scrap metal (i.e., aluminum, flakes/scrap, zinc scrap, platinum clad, 304 stainless steel scrap, recycled materials for brass, recycled materials for copper, recycled cast aluminum alloy materials, copper scrap, recycled brass, recycled aluminum) is not covered by an export clearance **(EC)**.

In this regard, please be informed that the EMB-DENR states that the above-mentioned scraps are not classified as hazardous wastes pursuant to Table 2.1 of DENR Administrative Order (DAO) 2013-22: *Revised Procedures and Standards for the Management of Hazardous Waste (Revising DAO 2004-36)* Thus, the transboundary movement of such material is not covered by an EC. However, SBMA shall determine if the same is regulated by the country of destination so that the EMB-DENR can provide the necessary written notification for them.



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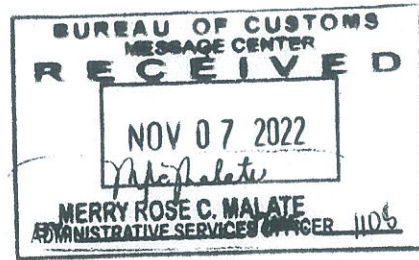


Management System
 ISO 9001:2015
 ISO 14001:2015
 www.tuv.com
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November 07, 2022

MS. AMETHYAP. DELA LLANA-KOVAL
 OIC-SDA for Regulatory Group/Manager
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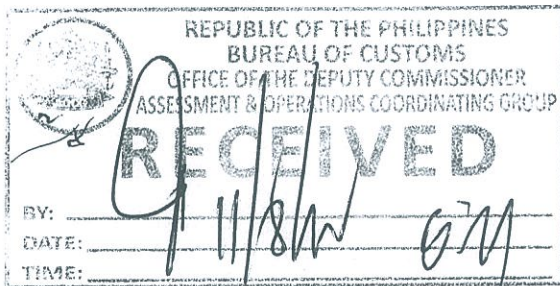
Subject: **TRANSBOUNDARY MOVEMENT OF SCRAP METALS IS NOT COVERED BY AN EXPORT CLEARANCE**

Dear Ms. Koval:

This has reference to your letter (IIS Transaction No.: CO-2022-038563) dated 03 October 2022 requesting confirmation from this Office that transboundary movement of scrap metals (i.e., aluminum flakes/scrap, zinc scrap, platinum clad, 304 stainless steel scrap, recycled materials for brass, recycled materials for copper, recycled cast aluminum alloy materials, copper scrap, recycled brass, recycled aluminum) is not covered by an export clearance (EC).

Please be informed that the above-mentioned scraps are not classified as hazardous wastes pursuant to Table 2.1 of DENR Administrative Order (DAO) No. 2013-22: *Revised Procedures and Standards for the Management of Hazardous Wastes (Revising DAO 2004-36)*. Thus, the transboundary movement of such material is not covered by an EC. However, you are enjoined to determine if the same is regulated by the country of destination so that we can provide the necessary written notification for them.

We hope we have addressed your concern.

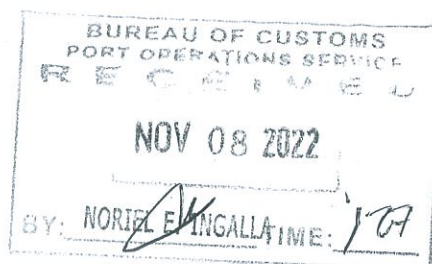


Very truly yours,

ENGR. WILLIAM P. CUÑADO
 Director

Digitally signed by Cuñado William Purgatorio
 DN: CN=Cuñado William Purgatorio, SERIALNUMBER=001006000462A, OU=Environmental Management Bureau-dnr, O=Department of the Environment and Natural Resources, C=

cc: **The Commissioner**
 Bureau of Customs
 Port Area, Manila



ACCG Memo No. 400-2022

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