

DIWASS – Challenges in the technical implementation of the EU interface from the perspective of the BDE

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The BDE Federation of the German Waste-, Water- and Circular Economy Management Industry represents the interests of private German waste management and recycling companies. Its approximately 750 member companies cover the entire value chain of the recycling industry, from the collection and transport of waste to its treatment, in particular recycling but also other forms of recovery, including thermal recovery, to the manufacture and use of products from the recovered materials. The shipment of waste is of central importance to the activities of the BDE's member companies.

There is broad support among BDE member companies for the European Union's objective of digitising the administrative processes involved in the shipment of waste using the Digital Waste Shipment System (DIWASS) and enabling efficient and transparent data transmission between industry and authorities in the shipment of waste through standardised digital interfaces. However, the successful implementation of DIWASS requires a technically mature, transparent and practicable system architecture.

The BDE and its member companies, however, see considerable challenges and problems in the implementation of DIWASS. These relate in particular to the practical implementation of the planned DIWASS interface and, specifically, the maturity of the technical documentation, access to test systems and organisational support for implementation. Based on the current state of preparations, it seems almost impossible that DIWASS will be implemented and operational by the planned date of 21 May 2026.

From the perspective of BDE member companies, the following measures on the part of the EU Commission are absolutely necessary to enable the introduction and use of DIWASS:

- provision of final, complete and practical technical documentation;
- establishment of a fully functional test system for system integration and workflow tests;
- clear designation of technical contact persons and support with regard to interfaces;
- establishment of a structured support and training programme for companies.

Only under these conditions can it be ensured that the companies concerned can implement the interface in a timely, reliable and cost-effective manner and that DIWASS can be successfully used.

In view of the fact that it is not realistically possible to achieve full connectivity for all affected companies, it is also essential to grant a transition period during which the documents required for transport can be sent to the authorities by post, fax or email. The companies are not responsible for the delays; the technical requirements were provided late by the European Commission.

Specifically, we see the following problems and would like to make the following comments:

1. Insufficient maturity of the technical documentation

The technical documentation currently available is still significantly incomplete and is clearly still in the development stage. A revised version of the documentation (version 0.3) was published on 27 February 2026. The version number alone shows that this is clearly not yet a final specification.

From the companies' point of view, this is unacceptable, as reliable technical documentation is the central basis for any interface implementation. In particular, the current version lacks explanatory information on individual elements of the interface description. Although structural requirements can be derived from the XSD files provided, there is often a lack of further explanations on the content significance of individual data fields and on the intended workflows within the system.

Companies would not use technical documentation at this stage of development as a basis for the external implementation of an interface. For reliable project planning, it is necessary that all functional and semantic requirements are clearly and completely described. Only finalised and consistent documentation enables companies to plan implementation projects realistically and implement them on schedule. Although the chosen format based on XSD structures enables technical implementation, it does not appear to be very future-oriented. Even if the solution is functionally adequate, the use of modern technology would have been significantly more advantageous for a long-term efficient interface.

However, it can be assumed that fundamental changes to the structure of the data format are rather unlikely. The European Commission did not publish the interface specification until 26 January 2026, even though the underlying EU regulation had already provided for publication in May 2025. Against this background, it can be assumed that the basic architecture has already been defined. Nevertheless, there is still no final, binding documentation that can serve as a stable basis for implementation.

2. Lack of a fully functional test system

The biggest practical obstacle to implementation at present is the lack of a fully functional test system.

The XSD files provided do allow for technical validation of the generated data structures. Companies can use them to check whether their data formats comply with the formal structure requirements. However, this is not sufficient for complete implementation. In particular, key aspects such as authentication with the system and the correct mapping of the intended workflows can only be verified within the framework of system integration tests. These require a corresponding test system.

Currently, only a technical test system is available, but this only allows structural tests to be carried out. This system is not sufficiently suitable for so-called semantic tests, i.e. the content-related and process-related verification of data transmission. Such tests also require the appropriate involvement of the receiving authorities or system operators.

The EU Commission should grant all interested software companies, and in particular those whose customers include companies and authorities involved in waste shipment, full access to a test system or, at the very least, provide them with the information and access necessary to successfully connect their customers' systems to DIWASS.

3. Lack of contact persons for technical questions

Another significant problem from the companies' point of view is the lack of clear contact persons for technical questions about the interface.

The European Commission has indicated on its information pages that technical questions should generally be clarified via the Member States. At the same time, however, the responsible national authorities have already signalled that they cannot provide the necessary technical support; On the German side, for example, the Länderarbeitsgruppe Gemeinsame Abfall-DV-Systeme (LAD GADSYS), an association of German federal states for the development, maintenance and operation of IT systems in the field of waste monitoring, is only involved in the development of DIWASS to a limited extent.

From the companies' point of view, this creates a situation in which key technical issues relating to interface implementation cannot currently be addressed.

4. Limited support from the European Commission

On 27 February 2026, the European Commission held a question and answer session for software companies that are to connect to the interface. However, this event provided only limited clarity.

The Commission explicitly stated that this was a one-off event. No further question and answer sessions or training courses are currently planned. A lack of human resources was cited as the reason for this. Instead, training measures are to be organised by the Member States, even though they themselves have not yet received the relevant training.

During the event, it also became clear that there is a considerable need for further exchange formats on the part of companies. The high number of participants (over 400) at the information event on 27 February 2026 alone clearly shows how big the problems still are with regard to a large number of issues. Numerous questions were asked in the event chat, many of which remained unanswered. The Commission did not indicate that it would provide answers to the open questions at a later date.

Furthermore, it remains unclear how the companies involved in the implementation can take on different roles in the process in order to test process chains consistently. The question and answer session on 27 February 2026 made it clear that there do not appear to be any uniform criteria for access for those involved in the process.

From the BDE's point of view, it is therefore essential that the EU Commission offers further training courses and question and answer sessions, preferably at regular intervals, in order to consistently and closely accompany the introduction process until its successful implementation.

In addition, the Commission should exert greater influence on the Member States and provide them with better support so that they, in turn, can provide trained personnel and offer assistance to companies.

5. Transition period required

If the problems identified cannot be resolved in the short term, many companies will not be able to participate in DIWASS by the deadline of 21 May 2026.

In view of the problems described, it is virtually impossible for companies to apply DIWASS within the deadline. As this is not the fault of the companies, the Commission should definitely provide for a transition period. The BDE refers to the experiences of German waste management companies with the introduction of the electronic waste documentation procedure (eANV) that was introduced in Germany in 2010. The eANV is a digital procedure for documenting and monitoring the disposal of hazardous waste. Waste producers, transporters and disposal companies must keep disposal records and consignment notes electronically and sign them with a qualified electronic signature.

The introduction of the eANV on 1 April 2010 was associated with considerable problems. Hardware (e.g. signature cards) and software were not available in time, standard systems for electronic documentation still had to be implemented, and in many cases registrations with the Central Waste Coordination Office (ZKS-Abfall) were not set up in time. In addition, there was a lack of sufficient training opportunities or practical support for users, which led to errors and uncertainties in the use of the system. As a result, many companies were still unable to participate fully in the electronic procedure on the deadline date and in the period thereafter. In contrast to the upcoming DIWASS introduction, however, the eANV interface was already technically almost completely available almost two years before its introduction, and training courses were offered regularly by the federal and state governments. Nevertheless, the scope for interpretation in the processes caused major problems for a long time.

As the legal obligation to use eANV came into force relatively quickly, transitional arrangements were put in place. During a transitional phase, it was initially possible to use paper receipts instead of electronic signatures and to transfer the data electronically at a later date. In individual cases, the authorities granted certain deadlines and leniency, provided that disposal remained secure.

Experience with the introduction of the eANV in 2010 has shown that a transitional solution can be necessary and sensible.

Accordingly, the EU Commission should also allow transitional periods for participation in DIWASS and enable companies involved in waste shipment to continue to use the applications and documents required for waste shipment in paper form and to send them to the authorities by post, fax or electronically by e-mail within a certain period of time – ideally one year.