



European Union Network for the Implementation
and Enforcement of Environmental Law

Enforcement Actions 2024

Final Report

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Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the European Union (EU) Member States, and of other European authorities, namely from acceding and candidate countries of the EU and European Economic Area (EEA). The association is registered in Belgium and its legal seat is in Brussels, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 8th Environment Action Programme that guide European environmental policy until 2030, the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil" on Flagship 5 and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

Information on the IMPEL Network is also available through its website at: www.impel.eu

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Executive Summary <p>This project is the latest in the Enforcement Actions series and covers the “After-Life” commitments for the Shipment of Waste Enforcement Actions Project (SWEAP). It ran from 1 October 2024 until time of writing. The write-up period for SWEAP finished on 30 September 2024. Given that this project only covered one quarter, it was limited to three exchanges, taking part in Slovenia, Germany and The Netherlands.</p> <p>Details of updates to tools created under SWEAP are provided below. Inspection results were also collated during this period. Results are provided for the whole of 2024 to provide better context for waste shipment inspections and illegal shipments to, from and within IMPEL’s member countries. The webinar scheduled to take place under this project will take place in February 2025, once additional inspection results for 2024 have been uploaded.</p>	
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1. Background

This project is the latest in the Enforcement Actions series and covers the “After-Life” commitments for the Shipment of Waste Enforcement Actions Project (SWEAP). It ran from 1 October 2024 until time of writing. The write-up period for SWEAP finished on 30 September 2024. Given that this project only covered one quarter, it was limited to three exchanges, taking part in Slovenia, Germany and The Netherlands.

Details of updates to tools created under SWEAP are provided below. Inspection results were also collated during this period. Results are provided for the whole of 2024 to provide better context for waste shipment inspections and illegal shipments to, from and within IMPEL’s member countries. The webinar scheduled to take place under this project will take place in February 2025, once additional inspection results for 2024 have been uploaded.

Meetings were held w/c 9th December 2024 with the Project Team for Enforcement Actions 2025-27 to discuss recent inspections and plans for 2025 operational activity.

1.1. Updating the inspection App

The inspection App has been updated to include the new e-waste entries that will enter into force on 1 January 2025. The export controls section has also been expanded to include them. Several of the ‘problematic waste streams’ have also been updated.

A development and hosting contract was signed between IMPEL and Zooma on 11 December 2024. This runs for 5 years and covers development of the App to enhance security and to ensure compliance with data protection legislation. Work on the next sprint has been determined and will start shortly.

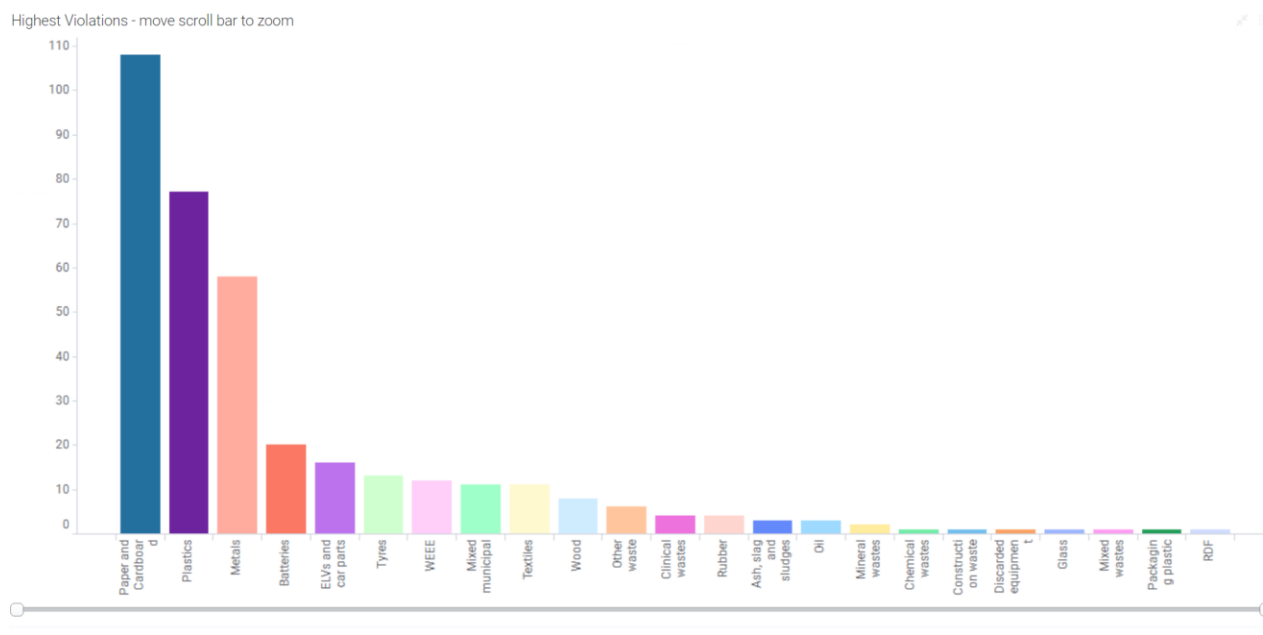
The visualisation tool also delivered under SWEAP has been updated to provide further detail on waste types.

1.2. 2024 inspection data

Data are still being collected from IMPEL members for inspections undertaken in 2024. However, several competent authorities are using the inspection reporting app developed under SWEAP and their summary inspection data is therefore available shortly after inspection. At the time of writing, the following destinations were recorded for illegal shipments:

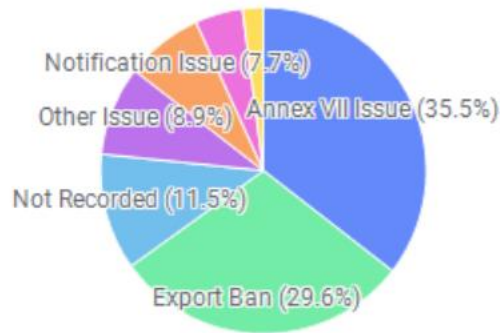


Authorities found the following waste types when they detected shipments in violation of the Waste Shipment Regulation (WSR).



The following violations were found:

ion type



The shipments subject to the export ban are broadly in line with previous projects. Members are invited to access the [SWEAP visualisation tool](#) for further details.

2. Exchange reports

Exchange reports for the events taking place in Germany, Slovenia and The Netherlands are provided.

2.1 Germany, October 2024

Münster, 22.10.2024

Münster district government leads waste transport control on the A30 in the German/Dutch border area

It accumulates in large quantities worldwide every day and can be liquid or solid, mixed together, heavy or light, corrosive, flammable or even completely harmless: waste. As the licensing and monitoring authority, the district government of Münster organises waste transport inspections several times a year in cooperation with the Federal Office for Logistics and Mobility (BALM), customs, the police and other national and international authorities. Last week, for example, a major control operation took place on two days in the German/Dutch border area on the A30. Thus, Dutch inspectors from the Ministry of the Environment (ILT) there were also involved.

Waste is traded and transported worldwide. Recyclable waste such as metals, paper and plastics are often sold abroad. Hazardous waste, such as contaminated soil, waste containing asbestos, contaminated wood or residues from waste incineration plants, must be disposed of in suitable special facilities. Various authorities are tasked with monitoring waste streams and proper waste disposal, ensuring that people and the environment are not endangered. This is done where waste is generated. In the treatment plants, at the disposal plants and, as in the case of the large-scale inspections, during the transport of the waste.

For more than 20 years now, the department of the Münster district government responsible for waste transport controls has been carrying out road inspections. However, since the employees of the district government do not have the right to stop vehicles, cooperations have been entered into with various national and international authorities.

Last week's inspection team, which consisted of around 35 people, consisted of representatives of the BALM, the motorway police, the Dutch Ministry of the Environment and the district governments of Arnsberg, Detmold, Düsseldorf, Cologne and Münster.

From the point of view of the Münster district government, the inspection days are to be considered positive. "We have been noticing an improvement in the situation on the roads for years," says Frank Gebauer from the Department of Environmental and Occupational Safety of the Münster district government. "We used to uncover a lot of illegal transports. Today, we are mainly dealing with waste in the trucks that does not match the driver's documents," adds Arno Vink from the Dutch Ministry of the Environment. "Successful cooperation with German colleagues and the various authorities is very important for uniform control."

On the two inspection days on the A30, the team checked the loads and papers of a total of 101 vehicles. With complaints in about 25 percent of the cases, the rate was roughly in the range of the controls of previous years.

Below are the results of the inspections:

Total vehicles checked: 101

Controlled waste transports: 82

Waste law complaints: 20



2.2 Slovenia, October 2024

Report on exchange of inspectors from Slovenia, Austria, Croatia, Hungary and The Netherlands within IMPEL Enforcement Actions project, Slovenia, 21st – 24th of October 2024



This exchange between The Environment and Energy Inspectorate of Republic of Slovenia (hereinafter IRSOE), Austria (representatives of Competent Authority), Croatia (representatives of State Inspectorate), Hungary (representatives of Competent Authority) and The Netherlands (environmental inspectors from ILT) was agreed within IMPEL Enforcement Actions project. The exchange lasted two and a half days and contained part of presentations as well as joint inspections on the field. We performed joint inspections as road checks (border crossing with Croatia, highway control point near border crossing

Šentilj/Spielfeld on Austrian side) and port checks (port of Koper).

From Slovenia also representatives from Customs and Police were attended the exchange.

Participants:

Country	Participant	Organization
Austria	Mr. Christian Gesek	BMK
Austria	Mr. Walter Pirstinger	BMK
Austria	Mr. Maximilian ReiterSchneeweiss	BMK
Croatia	Mr. Robert Rocek	State Inspectorate of Croatia
Croatia	Ms. Dubravka Janeković	State Inspectorate of Croatia
The Netherlands	Mr. Arno Vink	Human Environment and Transport Inspectorate
The Netherlands	Ms. Sabire Ozgan	Human Environment and Transport Inspectorate
Hungary	Ms. Andrea Szabo	PEST
Hungary	Mr. Jozsef Vaczi	PEST

Tuesday, 22nd of October

At the morning, representatives of all involved countries in the inspectors exchange delivered presentations about state of play in the field of shipments of waste with presenting some interesting case studies. Also representative from Slovenian Police delivered presentation about state of play in environmental crime in Slovenia. (all presentations will be forwarded to participants of the exchange). In the afternoon we travelled to border crossing at Slovenian-Croatian border, where we started our visit with the presentation of work of Customs mobile unit. Afterwards we started to inspect shipments of waste. We inspected four shipments, two shipments of non-ferrous metals, one shipments of plastic waste and one shipment waste lead plates, transported on notification procedure, no irregularities were found.



Wednesday, 23rd of October

On the second day, in the morning we performed joint inspection in port of Koper. Upon the risk assessment, performed from Customs, they prepared three containers for inspection:

1. Shipment of solar panels from Cyprus to Slovakia with Annex VII (after the inspection verification was done at CA of Slovakia, they approved that shipment can continue to Slovakia for recovery);
2. Shipment of plastic waste from Croatia to Turkey (shipment was declared as illegal, after notification of Croatian CA and providing the analysis, shipment was released);
3. Waste polyamide ropes from Egypt to Slovenia – no irregularities were found

After conclusion with our inspection activities, we had short presentations from representatives of Customs, working in port of Koper.



Thursday, 24th of October

On Thursday, last day of the exchange, we travelled to check point Gersdorf at Austrian side, where we executed inspection in collaboration with colleagues from Austrian Police and Customs. We checked several shipments of waste, mostly with the notifications (RDF, contaminated waste) and some shipments of green listed waste (paper waste, glass cullet), no irregularities were found.



After the end of inspection, we had a short meeting where we evaluated the inspectors exchange and exposed some conclusions of the exchange:

- Exchange was well prepared and organised
- The cooperation in Slovenia between national and international involved organisations is very good and there is an open communication
- Joint inspections are still needed for awareness raising for environmental and other organisations
- Challenge will be to keep the level of knowledge at the same level or even to improve it
- The cooperation with some neighbouring countries will stay challenging, with others the cooperation is very good.
- Facing a challenges with the new Waste shipment regulation no. 1157/2024, especially art. 65 (enforcement cooperation between authorities – to promote the prevention and detection of illegal shipments.

Annex 1:

AGENDA OF THE EXCHANGE:

Monday, 21st of October 2024

Arrival of participants

Tuesday, 22nd of October 2024

9,00 -12,00 meeting in the headquarters of IRSOE, country presentations

12,00 – 13,00 Lunch

14,30 - 16,30 joint inspection in border crossing Obrežje/Bregana (SI/HR)

Travel to hotel in Ljubljana

Wednesday, 23rd of October

8,30 depart from Ljubljana

10,00 - 12,00 port inspection in Port of Koper (with presentation of work of Customs, statistics, etc.)

12,00 – 13,00 Lunch

13,00 - 15,00 port inspection in Port of Koper

Travel to hotel in Ljubljana

In the evening official dinner

Thursday, 24th of October

8,30 depart from hotel and travel to Strass/Gersdorf (AT)

10,00 - 12,30 Road inspection

12,30 - 13,00 conclusions of the exchange and evaluation

Lunch and depart

2.3 Rotterdam, November 2024

Report on the exchange from November 18 to 21, 2024, in Rotterdam.

Participation of inspectors from Luxembourg (Administration de l'environnement), Germany (Regierung von Schwaben, Sonderabfall-Management-Gesellschaft Rheinland-Pfalz mbH and SBB Sonderabfallgesellschaft Brandenburg/Berlin mbH), Ireland (Dublin City Council), England (Environment Agency), and the Netherlands (Inspectie Leefomgeving en Transport).

The focus of the exchange was on getting to know each other and learning from one another to promote joint prevention and detection of illegal transfers. This exchange also provided the opportunity to showcase each other's methods for monitoring and enforcing Regulations 1013/2006 and 2024/1157. There was also ample room for discussion (including classifications and "end of waste"). Additionally, there was time to discuss the impact of the new Regulation 2024/1157



Tuesday 19th November

- introduction participants (max 5 minutes)
- presentation waste & logistics team (Arno Vink)
- pm to 1:45 pm presentation (customs) profiles (Erik van Doormalen)
- pm to 4:45 pm presentation and tour company

Upon arrival at the ILT office in Zwijndrecht, a brief explanation about our office. This location is a national collection office where, in addition to the ILT, two other inspection services are located: The Netherlands Labour Authority, Ministry of Social Affairs and Employment, and The Netherlands Food and Consumer Products Safety Authority.

After this explanation, there was be an introduction round of all participants followed by a presentation from the ILT waste logistics team. This presentation highlighted the team's activities, including transport inspections, company visits, and cooperation with Customs, Police, and local authorities.



After lunch, there was a presentation on how the ILT collaborates with Customs regarding the profiles in the Customs system, with an emphasis on plastic waste being transferred for R3 to non-OECD countries.

Following the presentation, there was a visit to a paper and plastic waste broker, Peute in Alblasterdam. Peute is an internationally operating company focusing on the recycling of paper and plastic waste.



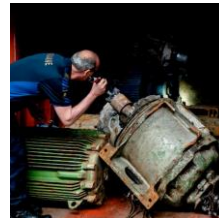
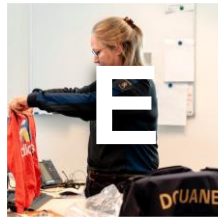
During the visit, the company provided an explanation about the trade in plastic and paper waste. There was also a discussion about the regulations concerning waste materials and the level of enforcement at the company in the Netherlands.

Wednesday, 20th November

10:30 am to 12:00 pm: General presentation by Customs and presentation by the VGEM team

1:00 pm to 3:00 pm: Check at the national inspection warehouse

The second day focussed on a visit to Customs at the Maasvlakte-Rotterdam. It began with a general presentation on the activities of Dutch Customs at the EU's external border, followed by a presentation by the VGEM team (SHEE = Safety, Health, Economics, and Environment). This presentation particularly emphasised the Environment cluster. The VGEM team includes several waste specialists with extensive knowledge of regulations concerning transboundary waste. The ILT collaborates very well with these colleagues. They serve as the eyes and ears for the ILT at the EU's external border.



Douane Rotterdam Haven

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In the afternoon, a visit to the inspection warehouse. A container with batteries was found.

Thursday, 21st November

- **10:00 am to 11:00 am:** Start of the presentation on the Ship Recycling Regulation (Jan-Willem Bil)
- **11:00 am to 11:30 am:** Conclusion of the exchange and evaluation

The final day included two presentations. Colleague Jan-Willem Bil gave a presentation titled "Introduction to the Ship Recycling Regulation (SRR)."

Maya Pryomoko gave a presentation on the practice of enforcement in England, Illegal Waste Exports, National Environmental Crime Unit (presentation by Matt Thompson), and the issues of return shipments, Illegal Waste Shipments Repatriations, Collections, Packaging Regimes & Waste Shipments.

The exchange concluded with an evaluation and conclusion. In my opinion, the exchange was well received by the participants. Contact details were exchanged, and agreements were made to conduct joint transport inspections, if possible (Luxembourg – Netherlands). Both Sabire and I look back on this exchange with great pleasure, largely due to the participation of all involved colleagues and the enjoyable discussions that took place.

3. Conclusions

The Project Team would like to thank all participants and especially the exchange hosts for their efforts in collaborating on this short project. From the results reported, and the timescales involved in the reporting, it is clear that there is regulatory divergence between the authorities responsible for inspecting waste shipments. Some authorities report their inspections 'live' using the App, other do this in a scheduled manner, whereas others have few results to report or difficult reporting structures to enable data to be extracted. This is due in part to the structure, jurisdiction, remit and staffing of organisations. The Team looks forward to continuing this work and increasing collaboration across IMPEL members in 2025-27.

Participating inspectors

Danielle	Frères	Luxembourg	Administration de l'environnement
Stephane	KREMER	Luxemburg	Administration de l'environnement
Simon	Schmitt	Germany	Regierung von Schwaben
William	Doyle	Ireland	Dublin City Council
Charlotte Ann	Buckley	Ireland	NTFSO Dublin City Council
Wiebke	Schnee	Germany	SBB Sonderabfallgesellschaft Brandenburg/Berlin mbH
Ulrich	Jeltsch	Germany	SAM (DE021)
Maya Ewa	Pryjomko	United Kingdom	Environment Agency
Matthew	Thompson	United Kingdom	Environment Agency
Robert	Maguire	Ireland	Dublin City Council