



European Union Network for  
the Implementation and Enforcement  
of Environmental Law

# Waste Sites II

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 EU Member States, acceding and candidate countries of the European Union and EEA countries. 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 Union 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 7th Environment Action Programme 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](http://www.impel.eu)

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<b>Executive summary:</b> <p>The Waste Sites II project, as a follow-up to the Waste Sites project of 2011-2, continued to explore illegal waste exports from the EU and possible ways to identify and control “upstream” facilities where the waste is collected, stored and/or treated before the shipment. In addition, the focus was widened to include some cases of waste streams inside the EU and the destinations where such waste is sorted and recycled.</p> <p>In the course of the project, joint inspections of waste sites were carried out in Belgium, Finland, Germany, the Netherlands, Romania, Slovenia and Sweden. The Waste Sites Manual whose English draft had been finalized in November 2012 (at the end of the previous project) was translated into Slovenian and German and tested by some authorities in practice. An expert workshop on “Illegal waste streams and waste sites” held in Frankfurt am Main (Germany) in April 2014 served as a forum of discussion between experts from environmental authorities, customs, police, industry and the European Commission. This workshop as well as other meetings and joint inspections highlighted best practices of identifying and controlling waste streams and waste sites, but also revealed a number of deficits in legislation and enforcement. .</p>	
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# 1. Introduction

## 1.1 Background

In tune with the general growth of world trade, waste streams in and outside Europe have continued to increase over the last decade. For some categories of waste, like WEEE and food waste, a particularly steep rise of volumes and tonnages can be observed. In the case of e-waste, for instance, a study of 2011 (StEP/Huisman) estimated that the generated quantity of then nearly 50 million tonnes worldwide would increase by 33 % in the five years until 2017. It is certain that the transboundary shipments of these wastes are in part illegal but just how large the proportion of illegal traffic is remains unclear and the estimates vary widely, depending on definitions and methodology.

As highlighted by the IMPEL-TFS “Waste Sites” project of 2011-2, many especially small- and medium-sized facilities for the collection, storage and treatment of waste play an important role in this illegal traffic. Notably the flows of electronic waste, batteries, end-of-life vehicles and their components are bundled on sites all over the more affluent parts of Western and Northern Europe, before the wastes are shipped to poorer countries in the East of Europe, in Africa and Asia. While the numerous shipments of allegedly still functional goods, many of which later turn out to be waste, often take the form of an “ant trade” and escape the attention of authorities in the EU, they add up to dangerous and excessively polluting dimensions mostly in the countries of destination. However, some of the problematic consequences of the illegal waste trade are also felt in Europe. Especially in some less densely populated EU Member States it has become apparent that illegal waste sites may be associated with organized crime, which increasingly undermines the local economy.

As a follow-up to the “Waste Sites” project, terms of reference were drawn up for “Waste Sites II” and adopted by the IMPEL General Assembly in December 2012 (see **Annex 1** to this Report). An updated ToR was approved by the General Assembly in December 2013 for the second year of the project and in relation to the budget revised by the IMPEL Board in February 2014 (see **Annex 2**).

## 1.2 Objectives and structure of the project

Under the terms of reference the project aimed to

- Promote cooperation and the exchange of best practices between competent authorities in the IMPEL member countries regarding the control of waste shipments and the inspection and compliance management at “upstream” waste sites;
- Stimulate the practical application of the Waste Sites Manual developed in the first Waste Sites project, to translate it from English into other languages and to update it on the basis of practical experience;
- Spread the use of a “waste stream approach” in IMPEL member countries by testing it on current cases;
- Explore best practices regarding the use of proactive strategies in the context of waste sites, e.g. by media campaigns, communication with business associations, traders and shipping lines.

The project was led by Germany and organized from the offices of the project manager in Frankfurt am Main. Meetings of the project team were held in this city on 3-4 April 2013 (kick-off meeting), 25-26 September 2013, 29 April 2014 and 16-17 October 2014 and partly combined with waste site or container inspections. Besides, team members organized such joint inspections in Romania (Oct. 2013, with DE), Finland/Sweden (Oct. 2013), Belgium (Nov. 2013 with NL, Sept. 2014 with DE) and Slovenia (Dec. 2013 with Austria) and/or participated in joint meetings and inspections which took place in the framework of the IMPEL-TFS “Enforcement Actions” project (especially in Landshut, DE, in March 2014).

An expert workshop on “Illegal waste streams and waste sites” was held in Frankfurt on 28-29 April 2014. For details see chapter 3 below.

A Slovenian translation of the Waste Sites Manual was produced and distributed to inspectors in the summer of 2013. A German translation by project team members was finalized in November 2014.

The actual project costs amounted to approximately 22,000 € over two years, of which 2,000 € were borne by the lead country (i.e. the German State of Hesse). The meeting and inspection reports as well as other messages were distributed to the project team by e-mail and posted on the IMPEL-TFS Basecamp.

### 1.3 Participants

The project team included experts - mostly waste shipment inspectors - from three German regional authorities (*Regierungspräsidium Darmstadt*, *Regierungspräsidium Gießen* and *Regierung von Niederbayern*) and regulators from Belgium (Regional government of Flanders), Finland, the Netherlands, Slovenia and Sweden. As in the previous project, *Thomas Ormond* from the *RP Darmstadt* (regional administration of South Hesse, DE) acted as project manager. The other members of the team were (in alphabetical order): *Katharina Aiblinger-Madersbacher* (DE), *Jürgen Decker* (DE), *Koos Kasemir* (NL), *Marja Riitta Korhonen* (FI), *Nils Löw* (SE), *Jonas Lundin* (SE), *Tom Nuyts* (BE), *Bojan Počkar* (SI) and *Maria Polixa* (DE). *Katharina Aiblinger-Madersbacher*, as country coordinator for Germany in the Enforcement Actions project, organized also joint activities – meetings and inspections - of the two projects.

Beyond this, other officials from project team administrations and other IMPEL member countries (notably Romania and Austria) participated in various inspections and other activities in the framework of the project.

The expert workshop in Frankfurt in April 2014 was attended by 45 participants from 12 EU Member States, Norway and Macedonia, as well as from the European Commission, Interpol, the WEEE Forum and industry. The Member State participants were mostly waste inspectors and other officials of environmental authorities but also representatives of the police and customs, as well as local public prosecutors. A list of participants is attached to the Workshop Report which is available via the IMPEL-TFS Basecamp website.

## 2. Joint waste site inspections

### 2.1 Germany/Romania

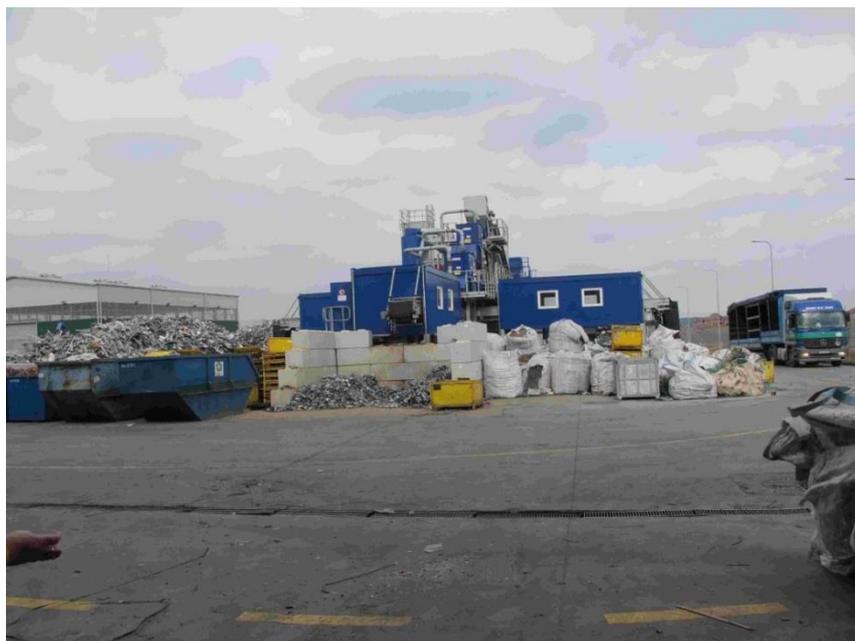


Photo:  
Recycling company in  
Frumuseni (Arad county)

In the context of the IMPEL-TFS projects “Enforcement Actions III” and “Waste Sites II”, two inspectors from competent authorities in two German regions (Lower Bavaria and South Hesse) participated in a three-day exchange visit in Western Romania from 7-10 October 2013. The visit was facilitated by the fact that one of the German inspectors (*Maria Polixa*) spoke Romanian. The exchange was organized essentially by *Katharina Aiblinger-Madersbacher* from Lower Bavaria in cooperation with the Romanian IMPEL NCP, *Lucian Popa*.

In view of widespread waste collections activities by Romanian citizens in Germany and frequent illegal waste shipments from Germany to Romania being stopped at the German-Austrian border (at least 25 shipments without the necessary notification documents in 2012 and early 2013), cooperation was sought with Romanian authorities to find out more about the destinations and establish how the wastes are treated and recycled or disposed of at the facilities in question. By this it was hoped to reduce the number of illegal shipments and possibly bring the waste sites at the destination into compliance, thus also avoiding time-consuming take-back procedures in future.

Other objectives of the exchange were

- to establish intensive contacts between German and Romanian inspectors,
- to compare inspection methods,
- to come to a common understanding with respect to the distinction of waste and non-waste, e.g. concerning ELVs, spare parts of ELVs, WEEE, used textiles and used tyres;
- to compare administration and organisation of waste treatment in both countries.

In preparation for the exchange, a list of suspicious waste shipments with destination Romania was sent to the Romanian IMPEL NCP who then organised visits to some of the companies of destination. These visits and inspections took place in various counties in the West of Romania. Seven recycling facilities for waste/used textiles and metal scrap were visited altogether, spread over a distance of about 1,000 km. Two meetings took place with environmental authorities in Arad and Hunedoara. The meeting in Hunedoara in particular, which was chaired by the President of the District Administration and extensively covered by local media, served to exchange information on administrative and technical matters and reach common understanding on essential points. As a consequence, various operators of waste

sites applied for the necessary permits and urged also their suppliers to comply with waste shipment rules.

During the inspections and meetings the participants improved their knowledge about important topics and current problems concerning transboundary waste shipments. It was agreed that the combination of road inspections and follow-up inspections of relevant waste sites (including companies of destination) is crucial for effective measures against illegal waste shipments. This requires close cooperation between the competent authorities of dispatch, transit and destination. The Romanian authorities on their side have carried out such follow-up inspections already in many cases.

Regular contact with relevant businesses and awareness-raising of the public, also by means of TV and press coverage, were found to be useful elements of a strategy against illegal waste traffic.

At the time of the visit an evident lack of cooperation by Hungarian authorities and an inconsistent handling of requirements and sanctions by those authorities proved to be a serious obstacle in this context.

Nevertheless, the recycling of waste textiles in Romania and the compliance with relevant waste shipment rules seemed to be on a good way. The issue of transboundary shipments of WEEE and ELVs was in comparison more difficult to handle due to the fact that it is not bigger companies which are usually involved but small and numerous retail dealers who cannot be supervised in an efficient way. The participants agreed that more effort would be needed to tackle this problem in the future.



(Photo:  
German inspectors with  
hosts in Hunedoara/RO)

The return trip of Romanian inspectors to Germany took place from 25-27 March in and around Lands-hut (Bavaria). The competent waste shipment authority of Lower Bavaria on this occasion organized its annual inter-agency meeting with German police, customs and Austrian authorities. The meeting was also attended by waste inspectors from Bulgaria and the Netherlands, and the foreign participants were invited to attend waste transport inspections on the German-Austrian border.

## 2.2 Sweden/Finland

Initiated by Swedish and Finnish members of the project team, joint inspections in the border region of North Sweden (Haparanda, province of North Bothnia) and Finland (Tornio region) took place on 22 and 23 October 2013. At first, on the Finnish side, two inspectors from the Finnish Environment Institute (SYKE) – project team member *Marja-Riitta Korhonen* and her colleague *Hannele Nikander* visited a recycling facility for scrap metal and end-of-life vehicles in Tornio and the offices of Finnish Customs in this city. On the second day, the SYKE inspectors joined a traffic control and the inspection of an illegal waste site near the Swedish border town of Haparanda, which was organized by the criminal police in North Bothnia and attended by officers from various other Swedish police forces.

## 1. Inspection in Tornio (Finland)



(Photo: Waste tyres in Tornio, Northern Finland)

The interest for the joint inspection in the Finnish–Swedish border area came from a suspicion that illegal shipments of waste, notably end-of-life vehicles, might frequently be crossing the border. Usually these shipments originate from Sweden and are destined for Finland, because the price for end-of-life vehicles is higher there. One waste site on the Finnish side of the border was in special interest because one of their shipments had earlier turned out to be illegal. Also a need for discussion with the Tornio customs had arisen.

A company dealing with scrap metal and end-of-life vehicles was chosen because they had transported in September 2013 three end-of-life motor vehicles from Haparanda (Sweden) to another site in Kajaani (Finland) without a waste shipment permit or an Annex VII document. Following this, SYKE issued a warning against the company for negligence under the Finnish Waste Act. The aim of the inspection was to visit the company site and check the legality of their activities there. The SYKE inspectors, who were accompanied by officials from the environment authority of the City of Tornio, also wanted to talk and advise about waste shipment issues, mainly green listed waste shipments.

As a result of the inspection it was found that the company had the necessary waste permit for trading and transporting metals, end-of-life vehicles, used tyres and batteries in Finland since June 2013. Most of the waste comes from Northern Finland but some is also imported from Sweden. The company had also applied for an environmental permit from the City of Tornio for the intermediate storing of end-of-life vehicles and the receiving and collecting of waste batteries and accumulators. The company did not drain vehicles on their properties but planned to start this business, so they applied for the relevant permit from the Lapland Centre for Economic Development, Transport and the Environment. Besides, it was envisaged to establish a subsidiary company in Sweden for the draining of cars before they are transported to recycling companies in Finland. Contracts with Finnish companies for the adequate recovery of used tyres and waste accumulators existed, and all types of waste were appropriately stored on the site.

The company who wants to concentrate on the import of dry end-of-life vehicles from Sweden to Finland and thus on green-list shipments asked questions about how to fill in the Annex VII document and was advised accordingly. The findings of the inspection were afterwards communicated to the company itself, to the municipal authorities and to Finnish Customs.

The inspection was conducted in accordance with the checklist in Annex 3C of the IMPEL Waste Sites Manual. All questions in Annex 3C were found to be relevant even though the company did not process the waste on site yet; in so far they enabled a discussion about the future activities of the company. The table in Annex 7 was not used because all these data were reported in the inspection report.

The visit to the Finnish customs office in Tornio enabled a useful exchange of views and experiences between environmental and customs authorities. Tornio customs is understaffed and so has difficulties to control the several hundred thousands of trucks that pass the three bridges across the river Tornio every year (the river constitutes the Finnish-Swedish border). The resources of customs have been cut so they conduct road side inspections at the border very rarely. When the customs have a road side inspection by the main bridge the trucks entering Finland from Sweden can see the customs officers from the distance and they turn back and use another bridge to enter Finland. The transport inspections that do take place are not targeted to catch illegal waste shipments but focus on other types of illegal goods.

The knowledge of waste shipment issues among Tornio customs officers (including nine branch offices in Northern Finland) has not been very good in former years but was improved by a training session orga-

nized by SYKE specifically for customs officers in 2012. Since then the northern customs contacted SYKE quite regularly, especially in cases where a Norwegian company tried to transport domestic or other waste from Norway via Finland to Sweden or back to Norway without a permit. The shipments were turned back to Norway at the border. Probably there are a lot more of such illegal shipments but there are not enough resources for inspections.

SYKE showed the customs officers the documents that have to be attached to a waste consignment. Many of the officers never saw these documents before. Movement document and Annex VII were studied very thoroughly. The waste experts also talked about the actions that have to be taken when customs encounters an illegal waste shipment.

Customs staff informed that they had basically no co-operation with the Swedish customs or police. A pilot project, in which Finnish and Swedish customs could organize a joint road side inspection on both sides of the border was discussed as a good idea in this context, but nobody took responsibility for organizing it yet.

## **2. Inspections in Haparanda (Sweden)**

During the Swedish "Illegal waste project" of 2012-2013, the border to Finland in North Bothnia merited special attention due to the conspicuous illegal border trade with waste. It is estimated that 300,000 lorries pass the border at Haparanda and Tornio each year. The Criminal Intelligence Service of the North Bothnia County Police conducted a survey of waste crime in the region in 2012-3. In that survey it became apparent that there is a thriving cross-border trade in waste that is to a large extent illegal. The report also concluded that there is a substantial component of transnational organized crime involved in this as well as local criminals. The need for closer cooperation between Swedish and Finnish authorities was identified early, and thanks to the backing of IMPEL-TFS this was made possible in late October 2013.

The plan was to carry out several activities on 23 October on the Swedish side of the border. The joint venture was planned with the Finnish Police in Tornio and SYKE, but unfortunately the Finnish Police had to cancel its participation due to another ongoing case that day. A delegation of five police officers and CIS analysts who work with waste crime in Southern Sweden (Stockholm, Uppsala and Jönköping) was also invited to attend the operations.

The inspection of heavy traffic at the border crossing was conducted by the Traffic Unit from Norrbotten. They have been a key unit during the illegal waste project whose experience with road crime and the transport sector has been instrumental to facilitate a successful operational implementation of the project. The operation towards the illegal waste site was preceded by helicopter reconnaissance by the Police Air Unit in Boden. For this occasion an intelligence asset from the National Bureau of Investigation in Stockholm was assigned to the air unit. Prior to the inspection a planning meeting was also held with the concerned officers from the County Board and Haparanda city council environment authority. Since there had been snowfall the day before, the plan was to conduct the traffic control in the morning and the inspection of the waste site in the early afternoon in order to give the thaw as much time as possible to melt the snow.

When approaching the outskirts of Haparanda it was observed that a few men were loading a white van with discarded tyres. It was a Latvian van and it turned out that its occupants had permission from the local garage to take the tyres. Since tyres are not classified as hazardous waste under Swedish law and they were not stolen the police could not intervene. The Haparanda environment inspector, however, contacted the company and informed them that they are not allowed to dispose of their old tyres in this manner. Should their practice not be discontinued they would be subject to fines from the city council.



(Photo: Latvian van loading discarded tyres in Haparanda, North Sweden)

The control at the border turned out to be uneventful, as not one out of 15 controlled lorries was loaded with waste, which was a first time. That particular border crossing was selected because of its history of being used by waste transporters. The traffic unit could report that since the project started in July 2012 there has been an improvement regarding documentation among haulage companies and other transporters. The Annex VII document was more or less non-existent when the traffic unit started its work whereas it now usually accompanies the shipment.

The control provided a good opportunity for cooperation with the County Board and the Haparanda city council environment inspectors. According to Swedish regulation the County Board of each region is the authority that has to classify if a shipment is waste or not. The municipal authorities are responsible to certify that companies and businesses in their area comply with laws and regulations.

The illegal waste site that was then controlled south of Haparanda has been a problem for the local authorities for over a decade. The man who operates on the facility consistently refused to cooperate with the authorities and to follow their instructions. The situation has deteriorated since 2009 in such a way that action was necessary. The property used to be owned by the man's mother (now deceased) and the local council is worried that they will have to pay for the sanitation of the estate should the operator abandon it.



(Photo: Illegal waste site near Haparanda)

A few weeks before the inspection, the animal welfare unit at the County Board had confiscated animals on the estate due to suspicion of maltreatment of them. This had left the man in a rather agitated state and the County Board had therefore made a formal request for police protection so they could enter the property on the 23<sup>rd</sup>. The operator was known to collect waste from both the Swedish and the Finnish side of the border. During the inspection ample evidence was found of discarded food products from Finland that were kept in piles outdoors.

On the premises a burn site was found and clear indications that there was an ongoing trade with scrap metal, used car parts and e-waste. Apart from that there was also information that the operator has Russian associates whom he helps with export of car parts to Russia. Available information suggested that importing car parts to Sweden and then exporting them to Russia might be part of a scheme to evade fees to Russian Customs and Excise. It was also suspected that some of the discarded food including meat might be exported to Russia but declared as edible, thus causing a health hazard for potential consumers. On the premises the inspectors also found meat and dairy products stored outdoors and attracting rats and birds. The estate as a whole was covered with all sorts of waste. Most of it was stored close to the main buildings but large quantities were strewn all over the estate. Apart from the waste burn site it was clear that lead batteries and various petroleum products were stored in an unsafe way. Despite the snow one could see oil spilling on the ground at various locations and suspected smash- and burn sites for burning cable.

During the inspection the presence of the Finnish inspectors from SYKE was very useful, as they provided both expertise and language skills when two individuals who tried to sneak off the property pretended to be unable to speak either Swedish or English. They did, however, eventually acknowledge that they spoke Finnish.

After the inspection, the Haparanda city council decided that the operator of the site would be fined 15 000 SEK every third month until he has cleaned up the property. A criminal investigation was considered on the suspicion of environmental crime. The operator featured in local media claiming that the authorities were trying to sabotage his charity for Russia and Estonia.

*Nils Löw*, who was a team member of the Waste Sites II project and at that time officer of the Swedish police, concludes that from their perspective - in spite of the absence of waste transports at the border crossing - the joint inspection was a success. It gave valuable lessons on how to cooperate both between national agencies and transnationally. The illegal waste site provided an example of how the illegal waste economy works in the border region of Northern Sweden. It was also a reminder that all sorts of waste are tradable commodities. The IMPEL Waste Sites Manual was found to provide strategic guidance and worked well together with the operational decisions that were made based on the Environmental Code and other Swedish law.

### 2.3 Belgium/Netherlands

On 21-22 November 2013 the Flemish and Dutch environmental inspectorates organized two joint inspections at waste storage facilities in Flanders. The facilities are specialized in temporarily storing plastic waste and loading sea containers for export to the Far East. It has been known for years that waste traders – in this case Dutch traders – use such storage facilities across the border, and they bring in waste from all over Europe. One reason why they do this is the vicinity of the port of Antwerp and the good logistic know-how these facilities can offer to them. But another reason is probably the possibility to put up an administrative screen between their clients, namely the producers and the recyclers of the waste. The storage facility acts as a (temporary) recycling facility on the transport documents.

The aim of the inspections was to find out how transport documents were drafted in order to conceal the identity of producers and recyclers, and also to exchange operational information on traders that were encountered in the process of the administrative inspection.

In the run up to the actual inspections both storage facilities were requested to forward their registers with incoming and outgoing transports. Out of these lists, a large selection of dubious transports was selected by the Dutch and the Flemish inspectors. On the day of inspection, the managers of the storage facilities were asked to provide all documentation such as transport documents, weighing slips, invoices

etc. It turned out that in most cases these transport documents, mainly Annex VII, were completed in a correct way. The main problem seemed to be situated in Box 1 of Annex VII (the “person who arranges the shipment”) and, in connection, the lack of a contract according to Art. 18 WSR. The storage companies were not aware that, when they appear in Box 1, they have certain obligations regarding take back in case the shipment turns out to be illegal. This might be particularly important for them in view of the difficult financial situation of several of their clients due to the recent restraints on the waste market imposed by the operation “Green Fence” conducted by Chinese customs. Such storage companies might in the near future have to deal with batches of poor quality waste that is abandoned by their clients.

Apart from this, also the usual infringements regarding transport documents were encountered, such as empty boxes on the Annex VII, wrong waste codes etc. For these cases an exhortation was sent to the person who arranged the shipment.

*Bart Palmans* of the Flemish environmental inspection authority concludes that this exchange of inspectors was very useful to find out how such storage facilities go about their job, who the traders are that run these waste streams, what the usual quality of the waste is, and finally to get the latest news and rumors in the sector. The discussions between the inspectors also made clear that a more regular exchange of operational information on the activities of these traders is important.

## 2.4 Slovenia/Austria

From 18-20 December 2013, two Austrian officials from the waste shipment authority at the Ministry of the Environment took part in an exchange visit at the Slovenian port of Koper. The visit was organized by project team member *Bojan Počkar* and included a meeting between the Austrian experts and Slovenian officials from the Inspectorate for agriculture and the environment (IRSAE), the Customs authority and the Environment Agency, as well as a joint inspection in the port of Koper.

The meeting started with presentations from both sides on their respective field of work and in particular the status of waste shipments in Slovenia and Austria. It was noted that Koper is extensively used by Austrian companies for export and import of goods. Altogether the number of containers passing through this port exceeded 600,000 in 2013. Among waste exports, plastic waste figured as the no. 1 category of waste (more than 60 %) and was mostly destined for Asian countries like China (41 %), Pakistan, India and Hong Kong. Among waste imports, polyamid from the USA and New Zealand was by far the most important waste type in terms of mass and value. The illegal shipments of waste detected and returned in Koper during 2013 were mostly iron scrap (especially from demolitions), WEEE, waste cables and plastic foils, nearly all of them coming from Italy.

In their presentations, the Austrian visitors reported, among other things, that in 2012 the Austrian police authorities issued 116 fines for minor infringements of the WSR as well as penalties for 181 more serious administrative offences and referred 12 criminal offences to the public prosecutor. For the Slovenian environment inspectorate, *Bojan Počkar* informed that the number of illegal waste shipments dealt with by the inspection service had risen from 18 in 2010 to 30 in 2012, and the amount of fines issued from 55,000 € to 254,000 € in the same time period.



(Photo: Presentations of work in Koper)



(Photo: Platform for container inspection in the port of Koper)

The following field trip in the port of Koper focused on locations where waste is temporarily stored, a platform for checking containers and another platform where used cars are temporarily stored before export to non-EU countries. A few of these cars were inspected but none could be classified as waste (end-of-life vehicles).

The second day of the exchange was fully devoted to inspection checks. Two checkpoints were selected, one at the entry to the port, the other at the platform for container inspection. At the entry checkpoint, three documentary checks were carried out of Annex VII documents accompanying shipments of steel scrap which arrived in Koper by rail. The documents were filled in correctly, no irregularities were found. Then inspections were made of six containers with different types of plastic waste. In five cases, the documentary and physical checks did not show any irregularity. In the sixth case a physical check revealed that the waste (plastic tubes covered with aluminium layer) should be classified under Annex IIIB instead of Annex III of the WSR. The same type of shipment – involving the same companies - was also inspected at the second checkpoint. After consulting the participants of the inspection it was decided to release both shipments but to inform the competent authorities of dispatch (Italy) and destination (China) with the aim to get their opinion about classification of this type of waste.

At the container inspection platform 11 containers were selected for checking, on the basis of a risk analysis by customs authorities. In 10 cases the containers were loaded with different types of plastic waste, in the 11th case the waste was brass scrap. In one case the inspectors found out that the accompanying Annex VII document was not filled in properly and that the form was not any more in use (due to amendment of the WSR by Commission Regulation (EU) No. 255/2013 of 20 March 2013). The forwarding agent was ordered to deliver the new document which should be filled in properly. With the rest of the inspected waste shipments no irregularities were found. Most of the shipments came from Italy and Slovenia. In all cases the destination countries were China or Hong Kong.

The third and last day of the exchange was divided into two parts, another round of inspections in the port and a final meeting in order to examine the results of the exchange. For the inspections this time only one check point at the entry to the port was chosen. Documentary and physical checks were made of three containers of waste plastics and one truck with metal waste. No irregularities were found.

The participants of the exchange concluded that the inspection was prepared very well and showed best practice of how to execute an inspection. The visitors were impressed with the good cooperation between various enforcement and competent authorities in Slovenia. It was found that for successful enforcement the exchange of information at national and international level is essential so that experiences and best practices can be shared and used in daily practice. Both parties agreed to continue the cooperation between Austria in Slovenia with joint inspections and exchange of information.

### **Other inspections in Slovenia**

*Bojan Počkar* also informed the team members about other inspections that were carried out in Slovenia, partly with the help of the Waste Sites Manual. Notably in May 2014, a coordinated inspection by the Criminal Police, the Environment Inspectorate and Customs focused on two illegal waste sites near Ljubjana. In one of the locations, huge quantities of end of life vehicles, spare parts, metal scrap and



other wastes were found over an area of 12,000 m<sup>2</sup>. The operator did not have any permit for waste management nor was he registered at the Environment Agency as a collector of waste. In the second location the authorities discovered large quantities of lead acid batteries, waste tyres, spare parts of cars, metal scrap and cables. During the inspection the offender was not found, so the owner of the land was interrogated by the Police. The follow-up

(Photo: Illegal waste site near Ljubjana)

measures included a prohibition by the Inspection Service to collect further waste and the order to remove all wastes on site as well as prosecutions of the offenders.

Apart from this, IRSAE carried out an inspection campaign between March and May 2014 which focused on the management of packaging and packaging waste and organized a joint inspection of waste transports (road-side check) with Estonian and Dutch waste shipment inspectors in September 2014. Reports of all these inspections are to be found on the IMPEL-TFS Basecamp.

## 2.5 Port inspection and site visit by the project team in Germany

In connection with the second project team meeting on 26 September 2013, the team members could take part in the inspection of a waste container in the riverport of Gernsheim (South Hesse) on the Rhine. The inspection was preceded by an introductory briefing in the local offices of the Water Police which had the leading part in the control. The container was selected beforehand in view of its declared content (used cars) and destination (Tema in Ghana, West Africa). After a gas check by a works fireman the container was forced open at the back by the police and revealed a mixture of car parts (some of them rusty or oil-dripping), old tyres, loosely stacked electrical equipment, plastic barrels filled with smaller parts and old newspapers, water bottles and other food, as well as a range of other objects.



(Photo: Container check in Gernsheim, Germany)

There was no mobile scanner available for this control, so that the non-visible inside of the container could not be inspected. The damaged and dirty condition of the scrap parts in the visible area, the lack of documentation on functionality of the electrical equipment and the unsecured loading led the experts present to the view that this was a waste shipment and as such illegal. However, the competent authority of dispatch in the German state of Rhineland-Palatinate, which was contacted on the spot, tended to reject this classification and the consequential return to the place of dispatch as long as the non-functionality of the EEE had not been proved by tests on the spot. In the end, the container was released and went via Antwerp - not as declared via Rotterdam - to its destination in Ghana. As was discussed in a debriefing after the inspection, the case showed the usefulness of a targeted waste stream approach but also the need for common standards and for more cooperation between and inside EU Member States.

At the end of the last project team meeting (16-17 October 2014), the group visited the municipal e-waste recycling facility of *Recyclingzentrum Frankfurt*. The facility is licensed under German emission control law to dismantle and recycle various e-wastes and includes a repair shop which delivers material for re-use to a second-hand store also run by the municipal company. The non-repairable electrical and electronic equipment is dismantled for further recycling partly by hand, partly by a machine ("Crack-o-mat"). The majority of the workforce (110 of around 200) is currently composed of long-term unemployed people who receive vocational training there. About 4,000 tonnes of used electrical appliances are handled in the facility per year. The visit of the facility provided interesting insights for the team members and helped to understand that under current regulatory and market conditions it is increasingly difficult for e-waste recyclers to maintain a higher quality level and compete against international eco-dumping.

## 2.6 Other joint inspections

In the course of the project, team members arranged also other joint inspections in order to learn about best practices of waste shipment control. Notably, Swedish waste inspector *Jonas Lundin* from Norrbotten County Board took part in roadside inspections organized by the competent authority of South Hesse (Germany) near Darmstadt in March 2014, and German inspector *Jürgen Decker* from the *Regierungspräsidium Gießen* participated in inspections organized by the Flemish Environment Inspectorate in the port of Antwerp in September 2014. For both inspectors it was the first such experience abroad and so helped them to make good contacts and to learn about best practices and the pros and cons of different control methods and organizational structures.

## 3. Expert workshop in Frankfurt am Main (April 2014)

In the context of the project an expert workshop on “Illegal waste streams and waste sites” was held in Frankfurt am Main (Germany) from 28-29 April 2014. The meeting was organized by the *Regierungspräsidium Darmstadt* (Regional Government of South Hesse) and attended by 45 participants from 12 EU Member States, Norway and Macedonia, as well as from the European Commission, Interpol, the WEEE Forum and industry. Most country representatives came from waste authorities but there were also 10 officials from police, customs and public prosecution present.

The purpose of the workshop was to discuss the situation concerning illegal transboundary waste shipments and the role played by upstream waste sites in them, and to exchange information on best practices how to address the problem and improve the control of waste streams and waste sites.

The first of the three sessions was opened with an introduction to the “Waste Sites” project and a keynote speech by *Pascal Leroy* (WEEE Forum) on the illegal trade with e-waste and the measures to counter it. This was followed by critical remarks made by *Jürgen Braun* (Bremen police) from a police perspective on the practical problems in controlling illegal waste streams, and by various other statements on examples of national experiences. The session was concluded by a presentation from *Peter Wessman* (European Commission) on the new amendments to the Waste Shipment Regulation with regard to inspection planning and additional powers for inspectors.

The morning session on 29 April focused partly on specific issues and problems like the organized waste crime in Sweden and the mixing of agricultural wastes in the Netherlands. On the other hand, several presentations showed positive examples of how to improve the control of waste streams, the quality of recyclates for export and the cooperation between waste authorities, customs and other agencies. As last speaker, *Therese Shryane* from Interpol explained the CWIT project (“Countering WEEE Illegal Trade”) and invited the audience to participate in it.

The final part of the workshop was reserved for a discussion of conclusions and actions to be taken. As recorded in more detail in the workshop report, the discussion highlighted certain differences between countries but especially many similarities in the challenges posed by illegal waste streams (in particular of WEEE). Most experts agreed on the necessity of clearer rules, raising of public awareness, more stringent law enforcement and closer cooperation between states and different national authorities. They also warned that further reductions in the number of inspectors, as a consequence of the Europe-wide economic crisis, would seriously undermine the fight against illegal waste shipments.

## 4. Translation and work with the Waste Sites Manual

In the course of the project, the Waste Sites Manual as finalized in November 2012 was translated into Slovenian (summer 2013) and German (November 2014). The time lag in the case of Germany is due to the fact that, for lack of funds for professional translators or administrative resources for this purpose, the translation had to be done by two German project team members and one volunteering colleague in the Hessian Ministry of the Environment (*Christine Vorschneider*).

The quick translation in Slovenia enabled inspectors there to apply the Manual in practice and to give feedback about this experience to the project team. *Bojan Počkar* summarized these views by remarking that Slovenian inspectors use the Manual frequently, especially when doing inspections in companies, and that it is regarded as a useful tool.

As mentioned above in the context of the joint inspections in Finland and Sweden, inspectors in these two countries also made use of the Waste Sites Manual in its English version. Especially the checklists in the Annex to the Manual were found relevant for inspections of waste sites. In addition, Swedish regulators saw it as providing strategic guidance and working well together with law and guidance materials on national level.

Project team members from Belgium and the Netherlands remarked that inspectors in these countries do not normally use the Waste Sites Manual in their everyday work because nearly all of them are highly experienced and they can draw on extensive guidance from their national administrations.

The update of the Waste Sites Manual envisaged in the terms of reference for this project was not regarded as urgent by the participants at this stage. However, it might be necessary at a later date, particularly when the WSR amendment concerning waste shipment inspection plans has been implemented into Member States' law and practice.

## 5. Concluding remarks

Summing up, the Waste Sites II project provided a good basis for deepening and also newly establishing contacts between authorities and waste inspectors from different IMPEL member countries as well as sometimes between different administrations in the same country. In particular, the project helped to initiate good cooperation between German waste authorities (in the states of Bavaria and Hesse) and their counterparts in Romania concerning waste streams from one country to the other, and proved to be instrumental in bringing a sizeable part of the Romanian waste textile industry into compliance with waste shipment rules. A similar cooperation is under way between Germany and Bulgaria and will become fruitful in the context of the “Enforcement Actions” project as from 2015.

Even between the neighbouring countries of Sweden and Finland, the Waste Sites II project served as a useful framework for contact-building and information exchange regarding illegal waste traffic and problematic waste sites in the border region.

One structural difficulty of the project was to involve continually not only TFS inspectors but also regulators responsible for illegal waste sites from those (bigger) member countries where the two competences are separated. This explains why the focus on waste sites, as compared with waste transports, could not be maintained in every part of the project. It will remain a challenge also for future IMPEL-TFS projects but the combination of both aspects is crucial if authorities want to follow the “waste stream approach” and take effective measures against the illegal waste trade. As this project has showed again, thinking along the waste chain as a whole is still underdeveloped in those EU member countries where competences are fragmented between many different authorities.

Similarly, the use of proactive strategies in the context of illegal waste streams and waste sites could be promoted only to a limited extent in the course of this project. In the case of the German-Romanian exchange, the meetings with administrations and industry, supported by media coverage, showed the usefulness of this proactive approach. However, in view of the fact that communication is of key importance in this context, any joint activity of IMPEL members is structurally hampered by language problems and the sensitivities of stakeholders. A future IMPEL project which focuses on proactive strategies would therefore need more than average resources and careful planning in order to be fruitful.

As the Waste Sites project is discontinued, the aspect of waste sites control will have to be integrated into other IMPEL projects, notably “Enforcement Actions”. The Waste Sites Manual is recommended for use in this framework, and any revision will have to be discussed there. In addition, the planning of waste site inspections will be an issue for the envisaged project on waste shipment inspection planning.

## Annex 1: Terms of reference (as adopted Dec. 2012)

### TERMS OF REFERENCE FOR IMPEL PROJECT

\* Please read the supporting notes before filling in each section of this form.

#### 1. Project details

<b>Name of project</b>
Waste Sites II

#### 2. Scope

<b>2.1. Background</b>	<p>The proposal is based on the experiences derived from the first Waste Sites project of 2011-2012 which confirmed the assumption that in order to control illegal waste exports from the EU more effectively – notably of e-waste and end-of-life vehicles – it is important to target the sources of these waste streams and the “up-stream” facilities where the waste is collected, stored and/or treated before the export. Site-oriented policing measures have advantages compared to transport inspections in so far as they focus on local and regional hubs of the waste trade instead of accidentally intercepting individual shipments, they involve larger quantities of the waste, and they are more likely to uncover the underlying structure of the business behind illegal exports.</p> <p>For more details see Terms of Reference of Waste Sites project (phase 2, no. 2012/18).</p>
<b>2.2. Directive / Regulation / Decision</b>	<ul style="list-style-type: none"> <li>• Directive 2008/98/EC on waste (Waste Framework Dir., WFD)</li> <li>• Regulation (EC) No. 1013/2006 on shipments of waste (Waste Shipment Regulation, WSR)</li> </ul>
<b>2.3. Article and description</b>	<p>Under Article 34(1) WFD, establishments or undertakings which carry out waste treatment operations, establishments or undertakings which collect or transport waste on a professional basis, brokers and dealers, and establishments or undertakings which produce hazardous waste shall be subject to appropriate periodic inspections by the competent authorities.</p> <p>Under Art. 50 WSR Member States shall, by way of measures for the enforcement of this Regulation, provide, <i>inter alia</i>, for inspections of establishments and undertakings in accordance with the WFD and for spot checks on shipments of waste or on the related recovery or disposal. Checks on shipments may take place, among others, at the point of origin. Member States shall cooperate, bilaterally or multilaterally, with one another in order to facilitate the prevention and detection of illegal shipments.</p>

<b>2.4 Link to the 6<sup>th</sup> EAP</b>	<ul style="list-style-type: none"> <li>• Art. 8(1) and (2)(iii) EAP: Minimisation of the quantity of waste for disposal, ensuring safe disposal, avoiding emissions, development of environmentally sound waste recycling</li> <li>• Art. 9(2) EAP: Strengthening international environmental governance, achieving mutual supportiveness between trade and environmental protection, etc.</li> </ul>
<b>2.5. Link to MAWP</b>	<p>The project “Inspection of waste sites” is listed in the IMPEL TFS MAWP 2011-2015 (p. 20) for the years 2011-12. Its continuation should help in the future IMPEL effort (cf. MAWP, p. 9) to identify and develop good practices, produce guidance, tools and common standards and actively contribute to further improvements as regards inspection and enforcement of EU law especially with regard to the waste management facilities involved in exports of waste.</p>
<b>2.6. Objective (s)</b>	<ul style="list-style-type: none"> <li>• To promote cooperation and the exchange of best practices between competent authorities in the IMPEL member countries regarding the control of waste shipments and the inspection and compliance management at “upstream” waste sites;</li> <li>• To stimulate the practical application of the Waste Sites Manual developed in the first Waste Sites project, to translate it from English into other languages and to update it on the basis of practical experience;</li> <li>• To spread the use of a “waste stream approach” in IMPEL member countries by testing it on current cases;</li> <li>• To explore best practices regarding the use of proactive strategies in the context of waste sites, e.g. by media campaigns, communication with business associations, traders and shipping lines.</li> </ul>

### 3. Structure of the project

<b>3.1. Activities</b>	<p>The Waste Sites II project would be organized along the following lines:</p> <ul style="list-style-type: none"> <li>• A core group of: IMPEL representative, project manager and a number of supporting members should be formed.</li> <li>• Active participation in the project would essentially be realized by taking part in ‘twinning groups’, composed of inspectors from 2 or 3 countries. Members should represent the countries involved in an actual existing waste flow to and from waste sites. One of them should act as ‘case-holder’ to coordinate the joint activities and the information exchange (Basecamp!).</li> <li>• The project manager would supervise the different twinning groups, give advice and connect to IMPEL. The project team should be made up of the core group and the respective case-holders.</li> <li>• In addition, the project manager – assisted by the project team - would collect best-practice examples for proactive strategies on waste sites control.</li> <li>• A two-year duration is envisaged to allow more time for preparation, practical work and evaluation of results. The project would</li> </ul>
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	<p>start with a kick-off meeting of all participants. The number of project team meetings should be limited to 3-4 altogether, supplemented by teleconferences if necessary. A workshop or final meeting of participants in 2014 would be useful to discuss and disseminate the project results. In addition, the twinning teams should organize their meetings and exchanges at their own pace and in close connection to the regular work of inspectors (including communication with police, customs and other services).</p> <ul style="list-style-type: none"> <li>• The overall budget should not go much beyond the one for the first Waste Sites project, i.e. envisaged is a total amount of approx. 25,000 € over two years which should cover the essential project meetings, some translation costs and an extra amount for travel costs to facilitate the inspector exchanges where necessary.</li> <li>• The difference to the Enforcement Actions (EA) project would consist in the focus on site inspections and the use of data from the sites' logistical and financial administration, as part of the "waste stream approach". Joint activities with the "EA" project are intended.</li> <li>• The Waste Sites Manual would be used as a starting point, but not imposed and not limitative. In order to facilitate use of the Manual, its translation into at least some languages of countries that participate in twinning groups and intend to adopt the methodology presented will be supported as far as the content is concerned. Results of the project should be reflected in an update of the Manual.</li> <li>• On top of this, the lessons drawn from the project would be summarized in a final project report.</li> </ul>
<b>3.2. Product(s)</b>	<ul style="list-style-type: none"> <li>• <b>Joint inspections,</b></li> <li>• <b>Workshop,</b></li> <li>• <b>Translation and update of Waste Sites Manual,</b></li> <li>• <b>Final project report.</b></li> </ul>
<b>3.3. Planning (Milestones)</b>	<ul style="list-style-type: none"> <li>▪ Dec. 2012 Approval of project by IMPEL General Assembly.</li> <li>▪ Feb/March 2013 Kick-off meeting of participants, start of translations.</li> <li>▪ May 2013 Translation of Waste Sites Manual finalized.</li> <li>▪ April-June 2013 First round of joint inspections.</li> <li>▪ Sept.-Nov. 2013 Second round of joint inspections.</li> <li>▪ Feb.-April 2014 Third round of joint inspections.</li> <li>▪ May 2014 Workshop with participants and other experts.</li> <li>▪ July 2014 Distribution of workshop report.</li> <li>▪ Oct. 2014 Final project report, update of Waste Sites Manual.</li> <li>▪ Nov./Dec. 2014 Approval of docs by IMPEL General Assembly.</li> </ul>

#### 4. Organisation

<b>4.1. Lead</b>	Germany (State of Hesse)
<b>4.2. Project team</b>	Thomas Ormond (DE, project manager), Kirsten Göbel (DE) Piet ten Brink (NL), Mattias Lindgren (Sweden), Barry Sheppard (UK) Bojan Pockar (Slovenia), Other members to be decided.
<b>4.3. Participants</b>	Administrations of project team members in DE, NL, SE, UK and SLO; possibly other member countries (e.g. AT, BG, FI)

#### 5. Quality review

By IMPEL-TFS cluster
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#### 6. Communications

<b>6.1. Dissemination of results</b>	<ul style="list-style-type: none"><li>- Updated Waste Sites Manual to IMPEL-TFS members via Basecamp,</li><li>- Project report to members and the public via Basecamp and IMPEL website,</li><li>- Translations of Manual to national regulators via Basecamp and national agencies' intranet, possibly also in print,</li><li>- Possibly communication of project results to Commission desk officer,</li><li>- Communication of results to the media by news item on IMPEL website and by press releases at national level.</li></ul>
<b>6.2. Main target groups</b>	Domestic national, regional and local government (waste shipment and waste site inspectors, environmental authorities), police and customs
<b>6.3. Planned follow up</b>	To be assessed in the course of the project.

## 7. Project costs/Resources required (in 2013)

	Estimated costs	Budget requested from IMPEL (€)	Total payments committed by lead authority (€)	Payments by lead authority directly to the project (€)	Payments by lead authority via the IMPEL budget (€)
• <b>Project meetings in total (2013)</b>	9,700	9,700			
<i>Meeting 1 (Kick-off meeting):</i>					
No of Participants:	15	(10 travelling)			
Travel:	3,000	3,000			
Accommodation:	1,000	1,000			
Catering:	500	500			
Meeting venue:	0	0	0	0	0
Sub-Total:	4,500	4,500			
<i>Meeting 2 (Project team):</i>					
No of Participants:	8	(6 travelling)			
Travel:	1,800	1,800			
Accommodation:	600	600			
Catering:	200	200			
Meeting venue:	0	0	0	0	0
Sub-Total:	2,600	2,600			
<i>Meeting 3 (Project team):</i>					
No of participants:	8	(6 travelling)			
Travel:	1,800	1,800			
Accommodation:	600	600			
Catering:	200	200			
Meeting venue:	0	0	0	0	0
Sub-Total:	2,600	2,600			
• <b>Consultant:</b>	0	0	0	0	0
• <b>Translation:</b>					
• <b>Dissemination:</b>					
• <b>Attendance for Project Manager at Cluster meetings:</b>	500		500		
• <b>Other (specify): Travel costs of inspectors for joint inspections</b>	1,500	1,000	500		
<b>TOTAL</b>	<b>11,700</b>	<b>10,700</b>	<b>1,000</b>		
<b>Human Resources</b>	<b>Project manager: 10 days</b> <b>Project team members: 6 days</b> <b>Other participants: 3 days</b>				

## 7. Project costs/Resources required (in 2014)

	Estimated costs	Budget requested from IMPEL (€)	Total payments committed by lead authority (€)	Payments by lead authority directly to the project (€)	Payments by lead authority via the IMPEL budget (€)
• <b>Project meetings in total (2014)</b>	11,600	11,600			
<i>Meeting 1 (Workshop):</i>					
No of Participants:	30	(20 travelling)			
Travel:	6,000	6,000			
Accommodation:	2,000	2,000			
Catering:	1,000	1,000			
Meeting venue:	0	0	0	0	0
Sub-Total:	9,000	9,000			
<i>Meeting 2 (Project team):</i>					
No of Participants:	8	(6 travelling)			
Travel:	1,800	1,800			
Accommodation:	600	600			
Catering:	200	200			
Meeting venue:	0	0	0	0	0
Sub-Total:	2,600	2,600			
<i>Meeting 3:</i>					
No of participants:					
Travel:					
Accommodation:					
Catering:					
Meeting venue:					
Sub-Total:					
• <b>Consultant:</b>	0	0	0	0	0
• <b>Translation:</b>					
• <b>Dissemination:</b>					
• <b>Attendance for Project Manager at Cluster meetings:</b>	500		500		
• <b>Other (specify): Travel costs of inspectors for joint inspections</b>	1,000	500	500		
<b>TOTAL</b>	<b>13,100</b>	<b>12,100</b>	<b>1,000</b>		
<b>Human Resources</b>	<b>Project manager: 10 days</b> <b>Project team members: 5 days</b> <b>Other participants: 2,5 days</b>				

## Annex 2: Terms of reference, update for second year

(as revised by IMPEL Board, Feb. 2014)

### TERMS OF REFERENCE FOR IMPEL PROJECT

\* Please read the supporting notes before filling in each section of this form.

#### 1. Project details

<b>Name of project</b>
<b>Waste Sites II [Second year – 2014] 2014/03</b>

#### 2. Scope

<b>2.1. Background</b>	<p>The proposal is based on the experiences derived from the first Waste Sites project of 2011-2012 which confirmed the assumption that in order to control illegal waste exports from the EU more effectively – notably of e-waste and end-of-life vehicles – it is important to target the sources of these waste streams and the “upstream” facilities where the waste is collected, stored and/or treated before the export. Site-oriented policing measures are a necessary supplement for transport inspections as they focus on local and regional hubs of the waste trade and so potentially involve larger quantities of the waste and may uncover the underlying structure of the business behind illegal exports.</p> <p>While the first Waste Sites project produced a Manual for the identification of relevant waste sites, their inspection, the necessary follow-up and proactive strategies, the second project focuses on the practical application of the Manual, e.g. by joint inspections, and other measures to promote best practices.</p>
<b>2.2. Directive / Regulation / Decision</b>	<ul style="list-style-type: none"> <li>• Directive 2008/98/EC on waste (Waste Framework Dir., WFD)</li> <li>• Regulation (EC) No. 1013/2006 on shipments of waste (Waste Shipment Regulation, WSR)</li> </ul>
<b>2.3. Article and description</b>	<p>Under Article 34(1) WFD, establishments or undertakings which carry out waste treatment operations, establishments or undertakings which collect or transport waste on a professional basis, brokers and dealers, and establishments or undertakings which produce hazardous waste shall be subject to appropriate periodic inspections by the competent authorities.</p> <p>Under Art. 50 WSR Member States shall, by way of measures for the enforcement of this Regulation, provide, <i>inter alia</i>, for inspections of establishments and undertakings in accordance with the WFD and for spot checks on shipments of waste or on the related recovery or disposal. Checks on shipments may take place, among others, at the point of origin. Member States shall cooperate, bilaterally or multilaterally, with one another in order to facilitate the prevention and detection of illegal shipments.</p>
<b>2.4 Link to the 6<sup>th</sup> EAP</b>	<ul style="list-style-type: none"> <li>• Art. 8(1) and (2)(iii) EAP: Minimisation of the quantity of waste for disposal, ensuring safe disposal, avoiding emissions, development of environmentally sound waste recycling</li> <li>• Art. 9(2) EAP: Strengthening international environmental governance, achieving mutual supportiveness between trade and environmental protection, etc.</li> </ul>
<b>2.5. Link to MAWP</b>	<p>The project “Inspection of waste sites” is listed in the IMPEL TFS MAWP 2011-2015 (p. 20) for the years 2011-12. Its continuation should help in the</p>

	<p>future IMPEL effort (cf. MAWP, p. 9) to identify and develop good practices, produce guidance, tools and common standards and actively contribute to further improvements as regards inspection and enforcement of EU law especially with regard to the waste management facilities involved in exports of waste.</p>
<b>2.6. Objective (s)</b>	<ul style="list-style-type: none"> <li>• To promote cooperation and the exchange of best practices between competent authorities in the IMPEL member countries regarding the control of waste shipments and the inspection and compliance management at “upstream” waste sites;</li> <li>• To stimulate the practical application of the Waste Sites Manual developed in the first Waste Sites project, to translate it from English into other languages and to update it on the basis of practical experience;</li> <li>• To spread the use of a “waste stream approach” in IMPEL member countries by testing it on current cases;</li> <li>• To explore best practices regarding the use of proactive strategies in the context of waste sites, e.g. by media campaigns, communication with business associations, traders and shipping lines.</li> </ul>

### 3. Structure of the project

<b>3.1. Activities</b>	<ul style="list-style-type: none"> <li>• In the first year (2013), the Waste Sites II project was organized by a project team, consisting of the project manager and members from DE, BE, NL, SI, FI and SE. This team held a kick-off meeting in April and another meeting in September 2013, both in Frankfurt am Main (DE). Sub-groups were formed to perform joint site inspections in October and November 2013 by DE/RO, SE/FI and NL/BE, in cooperation with the IMPEL-TFS Enforcement Actions III project. With possible leftover funds another joint inspection is intended by SI with AT in late 2013.</li> <li>• Translation of the Waste Sites Manual from English into Slovenian was achieved in June 2013. A translation into German is under way.</li> <li>• For 2014, it is envisaged to continue with joint inspections of waste sites. Details are still to be discussed. In addition to the “twinning teams” mentioned above, a cooperation of DE with BG is intended, with a possible participation of SI and AT.</li> <li>• An expert workshop on more effective controls of waste streams and waste sites is planned for April 2014 in Frankfurt am Main.</li> <li>• In autumn 2014, an update of the Waste Sites Manual is intended on the basis of the experiences gathered in joint site inspections and with new expert knowledge from the workshop.</li> <li>• The budget for the year 2014 is by 2,000 € higher than originally granted in late 2012 and then reduced in early 2013 (then 13,100 €), in order to enable four separate joint inspections (for calculated costs of 1,000 € each) in the coming year. The sum of 15, 100 € should also cover the costs of the expert workshop and two project team meetings (one of them back-to-back with the workshop). Translation and updating of the Waste Sites Manual will be done by the project team and colleagues in their administrations without the help of a consultant.</li> </ul>
<b>3.2. Product(s)</b>	<ul style="list-style-type: none"> <li>• <b>Joint inspections,</b></li> <li>• <b>Workshop,</b></li> <li>• <b>Translation and update of Waste Sites Manual,</b></li> <li>• <b>Final project report.</b></li> </ul>

<b>3.3. Planning (Milestones)</b>	<ul style="list-style-type: none"> <li>▪ March, May/June and/or Sept. 2014 Joint inspections.</li> <li>▪ April 2014 Expert workshop in Frankfurt (DE).</li> <li>▪ June 2014 Distribution of workshop report.</li> <li>▪ Oct. 2014 - Final project team meeting; - Final project report, update of Waste Sites Manual.</li> <li>▪ Nov./Dec. 2014 Approval of docs by IMPEL General Assembly.</li> </ul>
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#### 4. Organisation

<b>4.1. Lead</b>	Germany
<b>4.2. Project team</b>	Thomas Ormond (DE, project manager) Katharina Aiblinger-Madersbacher, Jürgen Decker, Kirsten Göbel (DE) Tom Nuyts (BE) Marja-Riitta Korhonen (FI) Koos Kasemir (NL) Nils Löw (SE) Bojan Počkar (SI) Other members to be decided.
<b>4.3. Participants</b>	Administrations of project team members in DE, BE, FI, NL, SE and SI, plus AT, BG and RO and possibly others.

#### 5. Quality review

By IMPEL-TFS cluster
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#### 6. Communications

<b>6.1. Dissemination of results</b>	<ul style="list-style-type: none"> <li>- Updated Waste Sites Manual to IMPEL-TFS members via Basecamp,</li> <li>- Project report to members and public via Basecamp and IMPEL website,</li> <li>- Translations of Manual to national regulators via Basecamp and national agencies' intranet, possibly also in print,</li> <li>- Communication of project results to Commission desk officer,</li> <li>- Communication of results to the media by news item on IMPEL website and by press releases at national level.</li> </ul>
<b>6.2. Main target groups</b>	Domestic national and regional government (waste shipment and waste site inspectors, environmental authorities), police and customs
<b>6.3. Planned follow up</b>	To be assessed in the course of the project.

## 7. Project costs/Resources required (in 2014)

	Estimated costs	Budget re-quested from IMPEL (€)	Total pay-ments com-mitted by lead authority (€)	Payments by lead authority directly to the project (€)	Payments by lead authority via the IMPEL budget (€)
• <b>Project meetings in total (2014)</b>	11,100	11,100			
<u>Meeting 1 (Workshop and project team):</u>					
No of Participants:	30	(20 travelling)			
Travel:	6,000	6,000			
Accommodation:	1,600	1,600			
Catering:	1,000	1,000			
Meeting venue:	0	0	0	0	0
Sub-Total:	8,600	8,600			
<u>Meeting 2 (Project team):</u>					
No of Participants:	8	(6 travelling)			
Travel:	1,800	1,800			
Accommodation:	500	500			
Catering:	200	200			
Meeting venue:	0	0	0	0	0
Sub-Total:	2,500	2,500			
<u>Meeting 3:</u>					
No of participants:					
Travel:					
Accommodation:					
Catering:					
Meeting venue:					
Sub-Total:					
• <b>Consultant:</b>	0	0	0	0	0
• <b>Translation:</b>	0	0	0	0	0
• <b>Dissemination:</b>	0	0	0	0	0
• <b>Attendance for Pro-ject Manager at Cluster meetings:</b>	500		500		
• <b>Other (specify): Travel costs of inspectors for joint inspections</b>	4,000	<i>To be fund-ed via the EA project</i>	500		
<b>TOTAL</b>	<b>15,100</b>	<b>11,100</b>	<b>1,000</b>		
<b>Human Resources</b>	<b>Project manager: 10 days</b> <b>Project team members: 40 days</b> <b>Other participants: 20 days</b>				