



IMPEL-TFS ENFORCEMENT ACTIONS II

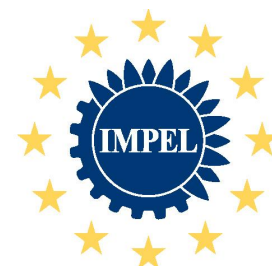
Enforcement of EU Waste Shipment Regulation

“Learning by doing”

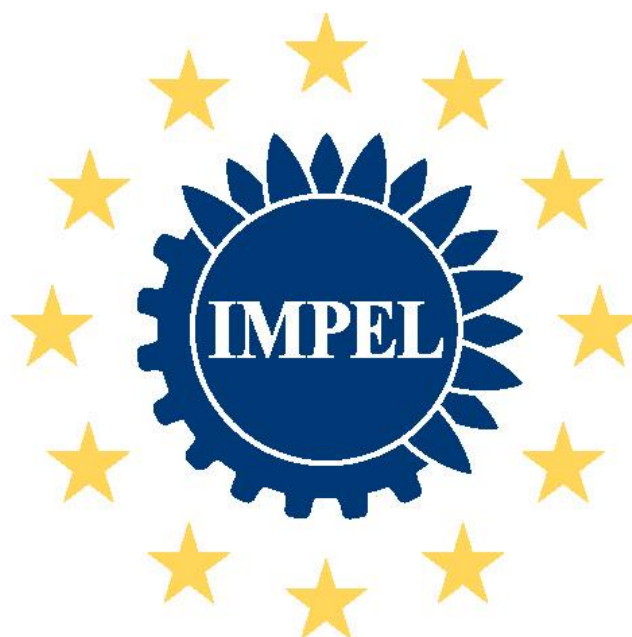
10 February 2010

Interim Project Report II - Preliminary inspection results

Inspection Period 4 – October – December 2009



European Union Network for
the Implementation and Enforcement
of Environmental Law



European Union Network for the Implementation and Enforcement of Environmental Law

The European Union Network for the Implementation and Enforcement of Environmental Law is an international association of the environmental authorities of EU Member States, EU acceding and candidate countries, and EEA countries.

The network is commonly known as the IMPEL Network

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on certain of the technical and regulatory aspects of EU environmental legislation. 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. It promotes the exchange of information and experience and the development of greater consistency of approach in the implementation, application and enforcement of environmental legislation, with special emphasis on Community environmental legislation. It provides a framework for policy makers, environmental inspectors and enforcement officers to exchange ideas, and encourages the development of enforcement structures and best practices.

Information on the IMPEL Network is also available through its web site at:

<http://europa.eu.int/comm/environment/impel>.

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1 Project results

1.1 Participating countries in Inspection Period 4

As illustrated in Table 1-1, 13 EU Member States and no further European countries actively participated in this Enforcement Actions II project, i.e. by executing transport and/or company inspections and sending their results. All of these countries have also been experienced from participation in the previous three inspection periods.

Table 1-1: Participating countries

1. Austria (AT)	6. Germany (DE)	11. Slovenia (SI)
2. Belgium (BE)	7. Hungary (HU)	12. Sweden (SE)
3. Czech Republic (CZ)	8. Ireland (IE)	13. United Kingdom (UK)
4. Denmark (DK)	9. The Netherlands (NL)	(England/Wales and
5. Finland (FI)	10. Portugal (PT)	Northern Ireland)

Participation during Inspection Period 4 concentrated on the following typical sites where inspections took place:

Table 1-2: Inspections according to different typical sites:

	Harbour/seaport	Road transport (national borders)	Road transport (other sites)	companies
Countries participating	Belgium Czech Republic Denmark Finland Ireland The Netherlands Sweden England/Wales	Austria Denmark Hungary The Netherlands Portugal Slovenia	Belgium Germany Ireland Northern Ireland England/Wales	Czech Republic Finland Hungary Ireland Northern Ireland England/Wales

Inspections of trains, airports and other places did not take place. Since from United Kingdom and Ireland summaries of inspections having taken place on several sites during a time interval of five or six days have been reported, the locations in particular are not available.

Compared to the previous three inspection periods, the focus on company inspections has increased. The number of joint and combined inspections has not been as high as in the periods before. More than in inspection period 1, 2 and 3 the events as announced in planning forms have nearly all been performed, except one company inspection that had to be postponed to next year since the case proved complex and required additional administrative assistance in advance, and one transport inspection in the Netherlands that was replaced by other results gained by customs. The planning form of Serbia was not realised during Inspection Period IV, and its realisation will depend on the joint plans of the neighbouring countries. In addition some further ad-hoc results have been contributed that have not been systematically planned in the IMPEL-TFS context.

1.2 Inspections and violations

1.2.1 Overview of inspections

Table 3.1 gives an overview on the amounts and types of inspection activities during Inspection Period 4. Each type of inspection has been enumerated as one action if announced by a separate planning form or having taken place at a specific site and date. Actions covering more than one calendar day were counted only once if notified as one combined or complex event, especially in the case of the transport inspections of one week reported by Ireland, England/Wales and Northern Ireland.

Table 1-3: Total number of inspection actions during Inspection Period 4

Type of inspections	Number of inspections in Inspection Period 4
Harbour/seaport inspection	7
Road inspection (border)	13
Road inspection (other)	9
Combination/concerted inspection	3
Company inspection	39
Total	71

As already identified in the previous inspection periods, waste shipment related inspections within the European Union as reported under Enforcement Actions II are highly unevenly distributed and large gaps in control can be seen, e.g. since several countries important for European and transnational transport and shipment are missing. However, the inspections described do not cover all waste shipments that are executed in Europe by waste shipment authorities, police and customs.

1.2.2 General results of transport inspections

The results of individual inspection activities within Inspection Period 4 are shown in Table 1-1.

Table 1-4: Results of single inspection cases during inspection period 4

Type of inspections	Total
Total number of transports	3,651
Administrative checks	3,518
Physical inspections	3,358
Number of transfrontier shipments of waste	550
Percentage transfrontier shipments of waste of total physical inspections	16%
Number of violations of the WSR	129
Percentage of transfrontier waste shipments in violation of the WSR	23%

On the basis of the compiled results one can draw the following conclusions:

- During the project phase of Inspection Period 4 a total number of 3,651 transports were inspected, this comprises the inspection of containers, trucks, bulk asphalt waste and documents. In this Inspection Period 4, unlike the previous ones, trains have not been the object of inspections.
- Of these overall inspections reported, in 3,358 cases (roughly 92%) also physical inspections of cars, containers or storage locations have taken place.
- Out of these physical inspections, 550 transports, i.e. roughly 16%, concerned transfrontier shipments of waste.
- All in all, 129 of the inspected waste shipments, this means 23%, turned out to be in violation of the WSR requirements. It has to be noted that non-waste related violations, e.g. of truck faults or non-compliance with minimum idle time of drivers have not been included in this figure.

This means that in general the ratios are comparable to previous inspection periods and those of the IMPEL-TFS I phase, although the share of violations seems to have slightly increased. However, interpretation of reported figures such as the number of inspections and “detection rates” has to be done with care. Especially with respect to the average percentage figures for transport controls, these percentages (as in the previous inspection periods) have been the result of a combination of at-random (e.g. as part of general traffic or customs control) and selective inspection measures (e.g. controlling only trucks with an obligatory “A” sign indicating waste transports at the Danish-German border). From the experiences of past inspection periods it was attempted to gain a more homogeneous handling of the reporting between MS, e.g. by some improvements in the result forms. Hence in many cases the reporting does not reflect the total number of waste shipment activities performed in the given period; country coordinators were offered confining themselves to three exemplary activities (e.g. in the case of the Netherlands).

1.2.3 Specification of violations observed during transport inspections

In the following, the results from transport inspections, including the number of detected violations are compiled country by country for Inspection Period 4.

Table 1-5: Reported numbers of inspected transports and violation rate from October – November 2009

Participating country	Total	Admin	Physical	Waste Inspections	%	violations	%
Austria	50	50	30	3	10.0	0 ¹⁾	0.0
Belgium	61	52	61	35	57.4	22	62.9
Czech Republic	617	617	617	8	1.3	4	50.0
Denmark	42	22	42	22	52.4	6	27.3
Finland	62	62	62	5	8.1	5	100.0
Germany	1645	1645	1645	261	15.9	16 ²⁾	6.1
Hungary	55	55	35	4	11.4	2	50.0
Ireland	150	54	96	95	99.0	17	17.9
The Netherlands	97	89	97	46	47.4	22	47.8
Portugal	493	493	493	27	5.5	9	33.3
Slovenia	279	279	85	5	5.9	0	0.0
Sweden	2	2	2	2	100.0	2	100.0
UK / England and Wales	24	24	19	24	100.0	22	91.7
UK / Northern Ireland	74	74	74	13	17.6	2	15.4
Overall total	3,651	3,518	3,358	550	16.4	129	23.5

- 1) One violation reported was discovered by Hungary in a joint inspection at the border and forwarded to the Austrian police, therefore it is only counted in the line for Hungary.
- 2) In total, 164 violations have been reported from inspections in Germany. An enquiry call showed that only the violations specified in section 4 of the result forms were related to trans-frontier waste shipment. The other 148 should be regarded as non-waste related violations, e.g. of truck faults or non-compliance with minimum idle time of drivers; therefore they have not been included in this figure and used for statistical analysis.

Allocation by country of dispatch and destination

The following Table 1-6 shows the statistics of violations, broken down by countries of dispatch and destination of the waste shipments.

Table 1-6: Violations related to dispatch and destination countries

Country	Dispatch	Destination
EU countries	104	57
Austria	3	-
Belgium	13	3
Bulgaria	2	-
Czech Republic	7	3
Denmark	5	-
Estonia	-	2
Finland	5	-
France	1	1
Germany	8	21
Hungary	1	2
Ireland	10	1
Latvia	-	1
Lithuania	-	1
Luxembourg	1	-
Netherlands	14	9
Poland	3	2
Portugal	3	2
Slovakia	1	-
Spain	2	4
Sweden	4	-
United Kingdom	21	5
Further European countries	-	-
Non-European countries	1	51
Bangladesh	-	3
China	-	14
Ghana	-	4
Guinea	-	1
Hong Kong	-	3
India	-	11
Indonesia	-	3
Ivory Coast	-	1
Kazakhstan	1	-
Malaysia	-	1
Morocco	-	1
Nigeria	-	3
Phillipines	-	1
Sierra Leone	-	1
South Korea	-	4
Unknown	-	4
Sum of all cases reported	105	112

One violation refers to bulk waste going from the Netherlands to several different countries, therefore both columns do not show the same sum.

The numbers in the column “dispatch” indicate the number of violation cases identified where the notifier or sender of the waste is located in the respective country listed in the left column, whereas the numbers in the right column “destination” indicate the number of violation cases, where the consignee indicated in the documents is located in the respective country. This allows showing whether certain countries are typically prone to be either the origin or the destination of illegal waste shipments.

Such a perspective may be biased due to controls not being equally distributed over the EU, since they have taken place at specific transport nodes or bottlenecks, and chiefly in the North of Europe rather than in the South. Also results depend on whether companies focus on import or export controls. Therefore the probability to be listed is higher for some countries than for others and this statistics should only be interpreted as descriptive. Wherever possible it was checked whether violations listed refer to more than one transport unit (usually a container or truck, in few cases open bulk), so the number of violations refer to single containers or trucks.

It is noteworthy that only one case of violation has been detected for waste imports from non-European countries (Kazakhstan) to the EU, and there has been no case of waste transits from non-European countries via the EU to other non-European countries.

As in previous periods of the project, China and India and to a lesser degree some African countries have been the main destination of waste streams leaving the European Union. However, data are not representative enough to allow general statements.

Allocation by underlying offence

As in previous phases, the categorisation has proved itself to distinguish between administrative violations and illegal shipments.

- Administrative violations are violations of the Regulation related to Article 18, where the papers accompanying the shipment (Annex VII) are incomplete, (partly) incorrect or missing. Conception is sometimes heterogeneous whether these administrative violations are part of the term “illegal shipments” or not – this should be used uniformly. In some cases it is obvious that the documents are made up in a wrong way in order to hide a violation. Such cases shall not be regarded as an administrative violation but as an illegal shipment.
- Illegal shipments (in a narrower sense) are violations of the Regulation according to Article 2 (35) when waste is shipped without authorisation, which should have been obtained via a notification, or shipments that are prohibited and which, if notified, never would have been granted authorisation. Cases in which the material transported does not correspond to the description in the documents are also marked as illegal shipments.

Violations of the shipment regulation are due to different reasons. Table 1-7 gives an overview of the quoted Articles and other explanations. As described in the previous chapter, 129 shipments were in violation. By pointed request, the details of these violations were in most cases reported and could be attributed to the number of transport units (usually trucks or containers).

The following information is based on those discovered violations, where details on type of violation, waste, country of origin and destination etc were reported accurately.

Table 1-7: Reasons for violations given in the total result transport inspection forms for Inspection Period IV (more than 1 violation per case reported possible)

Violation	Number of cases
Art. 18 Annex VII missing	21
Art. 18 without contract	4
Art. 18 Annex VII not complete	25
Art. 18 Annex VII not correctly filled in	5
Art. 16 c	3
Transport document not completed	2
No identification	6
Movement documents missing	3
Sum of administrative violations	69
Art. 36 export prohibition	2
Art. 2.35 (g)	1
Art. 4 (Notification missing)	1
Illegal shipment without notification according WSR	8
Art. 37,2	1
Art. 2 no 35 and Art. 4	2
Wrong declaration of non-hazardous waste	2
Export prohibited	2
Not 3 days announced illegal shipment	2
Mixture of waste (hazardous load), not as stated in documents	7
No CCIC (China Compulsory Certificate Mark), export to China prohibited	2
Sum of illegal waste shipments	30
Violation of national/regional waste legislation Czech Republic (1), Germany (2), Ireland (1), The Netherlands (1), England/Wales (11)	16
Not specified	1
Sum of other violations	17
Sum of violations in total	116

In two cases (referring to bulks of asphalt waste) investigations are still going on, therefore they are not counted as violations here.

From these results it can be concluded that there are three main focuses of violations:

- Administrative violations (Art. 18/16) 69 cases (59%)
- Illegal shipments due to EU legislation: 30 cases (26%)
- Others (especially violation of national and regional legislation): 17 cases (15%).

Most shipments in the second group were to be classified as illegal export due to a lacking notification, export ban or waste not corresponding to the declaration, especially in cases of waste mixtures.

Also a considerable number of 17 interceptions were due to inconsistency with specific national requirements related to shipment of waste such as prior notification to authorities of green listed waste transports, use of specific national forms etc.

For optimising the reporting it is recommended to add a closed list of category for violations which makes it easier to sort the categories in a consistent way.

Allocation by waste type

Furthermore an evaluation and assessment can be made as regards waste types involved in violations. In certain cases more than one waste type can be found in one case of violation, therefore the total of cases in Table 1-8 deviates from the sum of other tables.

Table 1-8: Overview of types of waste involved in shipments that were in violation of WSR

Waste type	Number of cases IP I	Most frequent violations
Metal waste	26	Art. 18 Annex VII document
Paper/cardboard waste	19	Art. 18 Annex VII document; mixture/contamination
Plastic waste	15	Art. 2 no. 35, Art. 4; export prohibited (China, Malaysia); no notification
Waste electrical and electronic equipment	14	Art. 16 c, Art. 18 Annex VII document; Art. 36 export prohibition, national regulation
End-of-life vehicles / vehicle parts	10	Export prohibited, also due to national regulation
Construction and demolition waste	4	No identification
Wood	2	Art. 18 Annex VII document, Art. 16 c
Textile waste	2	Art. 18 Annex VII document
Other / Mixtures	16	Art. 18 Annex VII document, national transport document, not 3-days announced illegal shipment; illegal shipment (mixture exported under green list or not as stated in notification documents), incorrect transport date
Not specified	3	
Total	111	

Even more than in previous inspection periods, metal waste was the most frequent category, mainly with administrative violations due to a missing or incomplete Art. 18 Annex VII document, followed by paper/cardboard and plastic waste.

1.2.4 Company inspections

For company inspections, new total results transport inspection forms have been designed and used, so that all transport inspections performed by one company during one inspection period can be aggregated within the form; unlike in the other inspection periods, cases do not have to be reported individually. The results of all company inspections, itemized to countries, the share of violations discovered, the function of the company sending or receiving waste, and the destination of the waste for disposal or recovery are shown in the following Table 1-3.

Table 1-9: Company inspection results – Descriptive statistics

Company inspections	Number of cases
Country	
Czech Republic	10 ¹⁾
Finland	1
Hungary	1
Ireland	1
United Kingdom / England and Wales	22 ²⁾
United Kingdom / Northern Ireland	4
Irregularities / Violations discovered	
Yes	55
Pending (Case still ongoing) ³⁾	1
Company sending or receiving waste	
Sender/Notifier	27
Recipient	7
Both sender/notifier and recipient	2
Exporter	2
Transporter	1
Operation envisaged according to permit	
Disposal	6
Recovery	10
Unknown/Irrelevant	23

¹⁾ Two company inspections have been initiated by violations related to documents of the sender (one in Czech Republic, one in Hungary) already discovered in previous controls. Therefore these violations have not been counted here again, since no further violation has been discovered at the place of the waste recipient or transporter. However, the senders will be further investigated. One more company inspection planned for Inspection Period III has been postponed to 2010, since the case proved complex and requires further administrative assistance.

²⁾ 39 single administrative checks and 18 physical inspections performed altogether in 22 companies.

³⁾ In one case the Dutch customs declared silicon waste as B4020 instead of B3010 (in the original declaration). Such a modified declaration would have the consequence that export in this case is forbidden. Additional investigation will prove whether the original declaration of B3010 was correct.

As illustrated in the table only six participating countries reported company inspections. In several cases more than one different irregularities and violations have been observed within one company.

Investigated companies were involved in both recovery and disposal processes. In the majority of cases the companies controlled have the function of the sender of the waste.

Although the share of company inspections has been higher in Inspection Period 4 compared to the three previous inspection periods, the number of results is restricted to a few countries and companies, chiefly in the United Kingdom and Czech Republic, and therefore does not allow making generalisations. However, the examples of company inspections show that within the branch of commercial waste treatment there is still a necessity for further information and awareness raising with regard to legal compliance.

The type of violations discovered at company inspections are due to different reasons and can be categorised in the following way:

Table 1-10 gives an overview of the quoted Articles and other explanations. 55 violation cases have been described (one “pending” case where the occurrence of a violation has yet to be decided not taken into respect). In the following details of these 55 violations with regard to type of violation are reported.

Table 1-10: Reasons for violations given in the total result company inspection forms for Inspection Period IV (more than 1 violation per company inspected possible)

Violation	Number of cases	Comments / Status
Art. 18 Annex VII missing	4	
Art. 18 (2), contract without obligations for company arranging the shipment and consignee	7	In one case contract was expired
Art. 18 Annex VII not complete or not correctly filled in	9	In some cases quantity received is missing in block 14
Handling/processing procedure not in accordance with Annex VII information of notification	5	
Sum of administrative violations	25	
Art. 36.2, no notification	2	
Art. 36, export prohibition	1	Due to too low metal content
WEEE found in containers on site	2	
Contamination found in baled green listed waste	3	
Sum of illegal waste shipments	8	
Violation of national/regional waste legislation Czech Republic (1), Hungary (1), Ireland (2), UK/England and Wales (17), UK/Northern Ireland (1)	22	
Sum of other violations	22	
Sum of violations in total specified during company inspections	55	

From these results it can be concluded, similar to the findings from transport inspections, that there are three main focuses of violations:

- Administrative violations (Art. 18) 25 cases (45%)
- Illegal shipments due to EU legislation: 8 cases (15%)
- Others (especially violation of national and regional legislation): 22 cases (40%).

1.2.5 Verifications

In order to decide whether waste shipments under inspection are allowed or illegal, after administrative checks (inspecting the transport documents) and/or physical inspection of the load a verification can be performed. If this is not possible on the spot, it should be done formally and in written form to the authorities concerned, for example to verify whether the company of destination is existent and allowed to treat the shipped waste. Therefore for each case of violation reported the total results transport inspection form contained the query:

- whether a verification request was conducted (**yes** or **no** to be marked with a cross)
- the **reason** for yes or no
- the **status** whether the verification request has already been executed or not.

In the violation cases specified the following answers have been given to this query. Especially the rubric “Reasons given” was left blank, but also “status” was not always specified.

Table 1-11: Answers on verification request in violation cases reported for Inspection periods I to III

Verification request	Number of cases		
Yes	35		
No	43		
No answer	21		
In case	Status specified	Number of cases	
Yes	Container sent back to sender (1 x via duly reasoned request)	12	
	Be fined / fee	8	
	Confirmed	1	
	Contact	5	
	Regulated, pending; penalty	2	
	Regulated	3	
	Regulated, returned to origin	1	
	Executed	1	
	Requested to neighbour country	4	
	Transport was stopped	2	
	No	Container blocked until regularisation on the spot (in one case studied by OVAM)	10
		Transport unblocked after regularisation on the spot	4
Take back		1	
Removed		1	
Fee		3	
Executed		5	
Pending		4	
No answer	Pending	1	
	Prohibited from onward shipment until completed Annex VII received	1	

The evaluation of the reported data shows that a verification request has only been started in about 1/3 of the detected violation cases.

These results have shown that either verification has not yet been performed to a sufficient degree or that reporting shows deficits. In principal verification would be beneficiary in all cases where a regularisation on the spot was not possible. Further necessity for information, training and support of the authorities why and how to perform a verification request has been identified. At least the usually occurring cases should be covered by a “field manual” for inspectors.

1.3 Cooperation and exchange of inspectors

1.3.1 Cooperation (Joint Inspections)

Continuing the work of previous inspection periods, the objective of cooperation by organised joint inspections was further intensified and especially extended to inspections of companies. This pertains both to different enforcement institutions cooperating within one country and to institutions of different countries working together. The environmental inspectorate of one country was in the standard case the responsible organiser of the inspection. Actions were frequently assisted in a proven way on the national, regional and local level by the authorities mentioned in the following (varying according to the federal and hierarchical structures of the Member States). The following authorities on different ministry or subordinate executive levels supported the actions:

- Environmental Protection/Inspection Agencies or Ministries for the Environment, Spatial Planning etc.
- National or regional police authority (transport, criminal, maritime, environmental, etc.) / Ministry of Interior
- Customs / Ministry of Finance
- Further local or regional authorities/municipalities

For details on participating and cooperating partners in each country see Table 2-1 to Table 2-15.

For nearly all transport inspections, but also for a considerable part of company inspections (23%), a cooperation of different authorities has been practiced, at least on the national level. Table 1-12 gives an overview on the number of countries in inspections and the number of inspections with national and international cooperation during Inspection Period 4 compared to the previous periods of IMPEL-TFS II.

Table 1-12: Overview of national and international cooperation over all inspection periods (based on information of total results transport inspection forms and company inspection forms)

Type of action	Total IP 1-3 (October 2008 – May 2009)	IP 4 (October – November 2009)	Total IP 1-4
Countries organizing inspections	20	13	20 ¹⁾
Number of inspections	94	71	165
Inspections with cooperation between different national enforcement bodies	81	40	121
International cooperations	28	17	45

¹⁾ All countries having participated in Inspection Period 4 have already participated in at least one of the previous periods.

On the basis of the reported data it can be concluded that:

- The number of countries organising inspections was within the interval of the previous inspection periods (12 – 17 countries);
- Waste shipment inspections (56%) were to a high degree performed on the basis of a cooperation of different authorities at national level;
- In 24% of the activities international cooperation could be achieved in terms of joint border controls, but also company and port controls.

Joint international activities have been performed at the borders between the following countries:

- Austria and Hungary
- Belgium and the Netherlands
- Czech Republic and Austria
- Czech Republic and Slovakia
- Ireland and Northern Ireland

In cases of company inspections, Czech Republic also cooperated with the Netherlands, Poland, Austria and Slovakia. In most of these cases there has been a request of the foreign authority based on the findings of preceding transport inspections.

Planned joint inspections between Serbia and neighbouring countries (FRY Macedonia, Bulgaria and Romania) have been postponed in order to coordinate a common timing of plans among all participating countries.

1.3.2 Exchange of inspectors

Exchanging the expertise, experience and best practices of inspectors has also been an important pillar of the IMPEL-TFS programme. During Inspection Period IV, there have been three further exchange activities with six countries having participated:

Table 1-13: Overview of exchange programs for inspectors during Inspection Period 4

Hosting country	Foreign experts	Number of foreign experts	Focus
Northern Ireland	Republic of Ireland	2 (Northern Ireland Environmental Agency)	Road and port inspections
The Netherlands	Estonia	2 (Environmental Inspectorate)	Road inspections (national border)
Slovenia	Austria	(To be supplemented)	Road inspections (national border)

Main subjects of the exchange have been as follows:

- methods to organise and execute port and road inspections
- Interpretation of transport documents (e.g. CMR, custom documents)
- collaboration with other authorities (e.g. customs, police)
- differences in legal powers (e.g. stopping vehicles, fines)
- problems and enforcement strategies to specific export of WEEE, plastics and ELVs

Further countries have announced the interest in exchange programmes provided further funding for that programme available. In spite of the exchange function of other joint activities between neighbouring countries a further expansion, but also specialisation of exchange programmes seems recommendable. A support tool for organisation has been developed in terms of a guidance document (Exchange procedures) accessible on Viadesk.

Depending on the requests of the participating countries and the budget for exchanges more exchanges can be planned in 2010 and 2011.

2 Annex: Control activities reported to Enforcement Action II project by participating country – Inspection Period 4 (October 2009 – November 2009)

Table 2-1: Inspections planned and performed in Austria

Date	Type and working method	Location	Comments
14.10.2009	Transport (Border)	Heiligenkreuz/Rábfüzés, border to Hungary	Cooperation with Hungary (National and regional inspectorates for Environment, Nature and Water as well as Directorates of the Customs and Finance Guard)

Table 2-2: Inspections planned and performed in Belgium

Date	Type and working method	Location	Comments
06.10.2009	Seaport (Containers)	Port of Zeebrugge	Cooperation with Flemish Environmental Inspection, Belgian Seaport Police, Customs Zeebrugge, Environmental Inspection Division and delegation of customs from the Netherlands
08.10.2009	Seaport (Containers)	Port of Antwerp	Cooperation with Federal Environmental Inspection, Belgian Seaport Police and Customs
22.10.2009	Transport (Road)	Province Luxemburg - Sterpenich	Provincial action, cooperation with Federal Environmental Inspection, Federal Road Police, Belgian Customs, Ministry of Mobility, social inspection
26.10.2009	Transport (Road)	Province Limburg	Provincial action, cooperation with Federal Environmental Inspection, Federal Road Police, Belgian Customs, Ministry of Mobility, social inspection

Table 2-3: Inspections planned and performed in Czech Republic

Date	Type and working method	Location	Comments
30.07.2009	Transport (Border)	Border crossing CZ/AT: Hatě/Kleinhaugsdorf	Joint inspection of Austria at the same time, focus on entering transport
30.07.2009	Transport (Border)	Border crossing CZ/AT: Mikulov/Drasenhofen	
27.10.2009	Transport (Border)	Border crossing CZ/SK: Mosty u Jablunkova/Svrčinovec	Joint inspection of Slovak Republic at the same time, focus on entering transport
27.10.2009	Transport (Border)	Border crossing CZ/SK: Břeclav/Brodské	
03.06.2009	Company	Vodňany	Inspection based on customs impulse
30.07.2009	Company	Sedlčany	
30.07.2009	Company	Ostrava	Inspection based on illegal trans-frontier shipment of metal scrap
19.08.2009	Company	Kladno	Inspection based on request of VROM
19.08.2009	Company	Ústí nad Labem	Inspection based on illegal trans-frontier shipment of metal scrap
01.09.2009	Company	Úvaly	
04.09.2009	Company	Praha	Inspection based on request of VROM
09.09.2009	Company	Pečky	
10.09.2009	Company	Praha	
06.11.2009	Company	Ostrava	Inspection based on detection of administrative discrepancy (Annex VII form)
24.11.2009	Company	Praha	postponed to 2010, since the case proved complex and requires further administrative assistance

Table 2-4: Inspections planned and performed in Denmark

Date	Type and working method	Location	Comments
24.09.2009 - 25.09.2009	Transport/Harbour (Containers)	Port of Copenhagen	Cooperation with Danish Police, Danish Custom and Local Authority
20.10.2009 - 22.10.2009	Transport (Border)	Border crossing DK/DE: Padborg	Cooperation with Danish EPA and Local Authorities
03.11.2009 - 04.11.2009	Transport (Border)	Border crossing DK/SE: Øresund Bridge	Cooperation with Danish EPA, Danish Police and Local Authority

Table 2-5: Inspections planned and performed in Finland

Date	Type and working method	Location	Comments
18.11.2009	Company	Heinola	Inspection related to an illegal shipment
23.11.2009	Transport/Harbour	Port of Helsinki	Cooperation with national customs

Table 2-6: Inspections planned and performed in Germany

Date	Type and working method	Location	Comments
19.10.2009	Transport (Road)	Motorway A 4 Ohorn Görlitz – Dresden both directions	Cooperation of Bundesamt für Güterverkehr, police and county administration (Landesdirektion) Dresden
20.10.2009	Transport (Road)	Motorway A 17 Nöthnizgrund Dresden – Praha both directions	
21.10.2009	Transport (Road)	Motorway A 4 Purschwitz Görlitz – Dresden both directions	
22.10.2009	Transport (Road)	Motorway A 4 Rossauer Wald Dresden – Gera both directions	
13.10.2009	Transport (Road)	Motorway A 20 Ravensmühle, direction Szczecin	Cooperation of Bundesamt für Güterverkehr and LUNG (County Agency of Environment, Nature and Geology Mecklenburg-Vorpommern)
20.10.2009 - 21.10.2009	Transport (Road)	Motorway A 7 Hüttener Berge, direction Flensburg	Cooperation of Bundesamt für Güterverkehr and GOES (Association for organisation and disposal of hazardous waste)
04.06.2009 / 16.09.2009	Transport (Road)	Region of Hesse	Cooperation of county administration (Regierungspräsidium) Kassel, Bundesamt für Güterverkehr and Customs Office Gießen

Table 2-7: Inspections planned and performed in Hungary

Date	Type and working method	Location	Comments
14.10.2009	Transport (Border)	Rábafüzes/Heiligenkreuz, border to Austria	Cooperation with Austria (Federal Ministry of Agriculture, Forestry, Environment and Water Management)
29.10.2009	Company	Újszilvás	Inspection of recovery facility

Table 2-8: Inspections planned and performed in Ireland

Date	Type and working method	Location	Comments
01.11.2009 - 06.11.2009	Transport	Several, not specified	Cooperation of National TFS Office, Dublin City Council and police (Gardai); officer exchange with NIEA (Northern Ireland Environmental Agency)
01.11.2009 - 06.11.2009	Company	Meath County	Cooperation of National TFS Office, Dublin City Council with Local Authority, Meath County Council

Table 2-9: Inspections planned and performed in the Netherlands

Date	Type and working method	Location	Comments
09.10.2009	Transport (Border)	Border with Germany, motorway A 1	Cooperation with German police and authorities
27.10.2009	Transport (Border)	Border with Germany, motorway A 1	Cooperation with German police and authorities; exchange with Estonian Environmental Inspectorate
01.10.2009 - 31.10.2009	Port / Customs	Port of Rotterdam	Customs inspections in cases that assistance of VROM inspectorate has been asked and given

Table 2-10: Inspections planned and performed in Portugal

Date	Type and working method	Location	Comments
19.10.2009 - 21.10.2009	Transport (Border)	Borders with Spain	Cooperation of Portuguese authorities IGAOT (Inspectorate for the Environment and Spatial Planning), GNR/SEPNA (Police for the Environment) and APA (Portuguese Agency for the Environment) with SEPRONA (police for the environment), Spain

Table 2-11: Inspections planned in Serbia

Date	Type and working method	Location	Comments
(To be appointed)	Transport (Border)	Joint inspections on the borders with FRY Macedonia, Bulgaria and Romania	Dependent on plans of neighbour countries, not yet carried out

Table 2-12: Inspections planned and performed in Slovenia

Date/Time	Type and working method	Location	Comments
16.09.2009	Transport (Border)	Šentilj, border to Austria	Cooperation of IRSOP (Inspectorate for Environment and Spatial Planning, ARSO (Environmental Agency), CURS (Customs Mobile Unit) and Mobile Police Unit of Republic of Slovenia, exchange with Austria
14.10.2009	Transport (Border)	Jelšane, border to Croatia	Cooperation of IRSOP (Inspectorate for Environment and Spatial Planning, ARSO (Environmental Agency), CURS (Customs Mobile Unit and Border Unit) and Border Police Unit of Republic of Slovenia

Table 2-13: Inspections planned and performed in Sweden

Date	Type and working method	Location	Comments
27.08.2009	Transport (Ship), Container	Stockholm, Frihamnen	Single ad-hoc inspections in cooperation of Swedish Environmental Protection Agency, Customs, Coast Guard, County Administrative Boards, Cities of Gothenburg and Stockholm
09.09.2009	Transport (Harbour), Container	Gothenburg Harbour	

Table 2-14: Inspections planned and performed in United Kingdom/England and Wales

Date	Type and working method	Location	Comments
26.10.2009 - 30.10.2009	Transport	Several, not specified	Cooperation of Environment Agency, Metropolitan Police, Her Majesty's Revenue and Customs and Port Authority
26.10.2009 - 30.10.2009	Company	22 company controls (16 waste storages/waste carriers, 4 waste brokers, 2 waste exporters)	

Table 2-15: Inspections planned and performed in United Kingdom/Northern Ireland

Date	Type and working method	Location	Comments
01.11.2009 - 05.11.2009	Transport	Several, not specified	Cooperation of Department of Environment – Northern Ireland Environment Agency with Republic of Ireland – Dublin City Council
01.11.2009 - 05.11.2009	Company	4 company controls (of which 4 of dispatch, 2 of destination)	

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