



European Union Network for
the Implementation and Enforcement
of Environmental Law

**IMPEL CLUSTER
TRANSFRONTIER SHIPMENTS OF WASTE "TFS"**

Examples of the impact of other legislation on Transfrontier Shipments of Waste

Final report: March 2015

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 Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 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

<p>Title report: Inventory of the impact of other legislation on TFS</p> <p>Project: <i>Tool to review the impact of new and existing legislation on TFS (TRIT) 2014/20</i></p>	<p>Number report: 2014/20</p>
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<p>Executive summary:</p> <p>EU environmental legislation can have (undesirable and/or unforeseen) impacts on the management of waste and especially the transfrontier shipment of wastes (TFS). New routes, loopholes and treatment facilities could emerge. The aim of this project was to collect examples of these impacts and to identify common elements of these examples.</p> <p>The results of an inventory and an expert meeting are ten examples of adverse effects of other legislation on TFS.</p> <p>From these examples the following common elements are identified:</p> <ul style="list-style-type: none"> • The exemptions in the waste shipment regulations cause unclear situations, because of gaps among the different legislation and lack of (uniform) definitions. • Product and substances legislation are used to consider a substance as end of waste. The criteria in these legislation do not always match with the criteria from the waste framework directive and waste shipment regulation. • National financial instruments like taxes and subsidies have a side effect in TFS. Companies are able to find international shipping routes to avoid the taxes or to make profit of the subsidies. <p>In the overall policy to a circular economy it is important to prevent these adverse effects in an early stage.</p>	
<p>Disclaimer: This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations or the European Commission.</p>	

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1. Introduction

EU environmental legislation can have (undesirable and/or unforeseen) impacts on the management of waste and especially the transfrontier shipment of wastes (TFS). New routes, loopholes and treatment facilities could emerge. This requires inspection authorities to revise their targeting and inspection planning. It is likely that few legislators realise the consequences of ‘technical fix’ or single issue legislation. TFS should take the lead as the unforeseen consequences of poor environmental legislation can be/ is frequently illegal export due to oversight of waste treatment being inevitable fragmented across the Union.

The IMPEL TFS 2013 conference recommended to consider developing a *“Tool to review the impact of new and existing legislation on TFS”* (TRIT). If well publicised, it would be a strong message for legislators to look more holistically at how their regulations will be implemented, especially if it came from TFS regulators.

The Terms of Reference (ToR) (annex I) of the project were adopted by the IMPEL General Assembly, however there was no financial support available to carry out the project. Due to the lack of resources the TFS cluster concluded that only the first activity of the ToR could be completed in 2014: Collect examples of where loopholes and consequences were identified (e.g. collection treatment rates).

This report contains the collected examples and common elements and criteria of other legislation that could cause adverse effects and loopholes for TFS.

2. Project approach

In August 2014 an inventory was sent to the IMPEL TFS National Contact Points (NCP) to collect examples of undesirable and unforeseen impacts of other legislation on TFS and violations of the Waste shipment Regulation that are caused by other (environmental) legislation (Annex B).

The collected examples were put together in an overview and similar examples are combined. The overview was presented and discussed during the IMPEL TFS NCP expert meeting in Rome at the 30th of September 2014. The overall result of the inventory, including the input from the meeting in Rome, is presented in chapter 3.

In January 2015 the final report including the found common elements (chapter 4) was sent to the NCP’s for review.

3. Collected examples

NCP's of seven member states have replied the inventory. After combining similar or related examples the result consists of ten examples. The input of the NCP expert meeting has led to improvement and extension of these examples.

Comments:

- The examples in this overview are based on real situations/cases that were discovered by European TFS authorities of and are not only theoretical possibilities.
- Some of the examples have been solved by member states, but can or do still exist in other member states.
- During the discussion in the NCP expert meeting it was confirmed that the examples do not reflect concerns of single authorities but that several authorities from different member states face the same problems.

Example 1
Adverse effect on the WSR
Contaminated packaging waste shipped as green listed waste
Related legislation
Packaging waste directive 96/62/EC and national implementations
Explanation of the situation
The packaging waste directive requires member states to recycle certain percentages of packaging waste. A variety of collection and sorting methods have been established by member states and regional authorities to achieve these targets. In some regions the different types of packaging (plastics, metals, paper, glass, wood) are collected separately, which could result in high quality green listed. In others all the recyclable packaging are collected together and need to be sorted and pretreated before it could be considered as green listed waste according to the WSR. The varieties of qualities have an effect on compliance of the WSR. Companies mix up none or poorly sorted packaging with good quality waste and export this falsely as green listed waste to mainly Asia.

Example 2
Adverse effect on the WSR
Waste destined for disposal shipped as waste for recycling
Related legislation
Disposal taxes/fees in national (waste) legislation
Explanation of the situation

The total median cost to landfill one tonnes of municipal waste in the EU appears to range from €17.50 up to €155.50 *. These charges consist of the gate fee to operate the landfill or incinerator and in most member states a landfill or incineration tax. The taxes are often part of the national waste policy to limit the amount of disposed waste. For companies it can be profitable to dispose waste in a country with low disposal charges.

However often the legal possibilities are limited. The result is that the waste is shipped with false information in the WSR notification or on the Annex VII document. A frequently used method is to ship the waste to a recycler in the country of the disposal facility. This recycler ships the waste without or after very limited recycling activities to the landfill or incinerator.

* Bio Intelligence service. Use of Economic Instruments and Waste management performances.
Final Report, 10 April 2012

Example 3
Adverse effect on the WSR
Illegal export of WEEE, particularly under the cover of “used electrical and electronic products”
Related legislation
<ul style="list-style-type: none"> • Waste Shipment Regulation (WSR) (EC) No 1013/2006 , • OECD Council Decision C(2001)107/Final, • WEEE Directive (2012/19/EU) • Community Customs Code and affiliated legislation, e.g. Commission Regulation (EEC) No 2454/93. •
Explanation of the situation
<p>A considerable part of the 10 million tonnes of WEEE that arise every year in the EU are not properly recycled but illegally exported, in particular to countries in West Africa under the label of used electrical or electronic goods. This illegal trade is not effectively stopped or reduced by waste shipment controls, due to a lack of resources but also to loopholes and inconsistencies in the applicable legislation that make effective enforcement very difficult. Some examples for such shortcomings:</p> <ul style="list-style-type: none"> • Most physical shipment controls are performed by transit authorities, especially in sea ports on the North Sea. These authorities, however, have inferior rights under Art. 28 WSR and are not entitled to return illegal waste shipments if the authority of dispatch does not agree with the classification as waste and the authority of destination is unavailable (which is often the case with “Africa” shipments, in particular because dealing with the returned container load of WEEE and usually other mixed waste makes a lot of work for the competent authority of dispatch). • There is no clear rule in the WSR that the person who arranges a shipment of WEEE has to be registered in the EU country of dispatch or of transit or at least represented by a person resident there. Member States’ practices vary in this respect. Enforcement against infractors who are not resident in the EU is much more difficult which makes sanctions often ineffective. • The waste code GC020 which was transposed from the above-mentioned OECD Decision into the WSR is currently the most frequently used code for WEEE exports (in so far as they are at all declared as wastes), although with a strict application of the “chapeau” criteria of Annex III the requirements for green-listed waste are almost never met. A total deletion of

the entry would be an important element in the fight against illegal WEEE shipments.

- The WEEE Directive does not contain an economic incentive – such as an EU-wide deposit system – for consumers and businesses to return their old electrical and electronic equipment to environmentally sound recyclers. Based on the WEEE directive depending of the implementation in the member states retailers have to accept discarded equipment of households for free. The retailers can hand over this collected WEEE to collection systems of the producers. However this waste stream can have a positive value for reuse or metal value. Therefore it, it is usually easier, more convenient and financially interesting to hand WEEE or used EEE over to illegal or dubious collectors who will then make a profit with the export to sub-standard operators in Africa.
- Under the Customs Code (cf. Art. 794 of Commission Regulation (EEC) No 2454/93), used EEE and WEEE are usually declared as low-value goods at the customs office of exit, not at the original loading point. Since the offices of exit in EU seaports are overburdened with a high number of customs declarations, only a tiny fraction of shipments will be inspected. A prohibition of declaration in the ports, such as is already practiced with shipments to embargo countries, would make control of illegal waste shipments much more effective.
- Under the Customs Code, customs offices are bound by secrecy obligations and usually not allowed to communicate information, e.g. on frequent loading points, to the waste shipment authorities. A legal duty for Customs to cooperate with environmental authorities would help effective enforcement.
- It has to be noted that the recast WEEE directive 2012/19/EU gives member states more possibilities to close these gaps than the former version (Directive 2002/96/EC). Whether the gaps are fitted will also depend on the national implementation by member states. Not in time implementation is also seen as a gap.
- Article 15 of the WEEE Directive places responsibility on each Member State to ensure that producers of EEE provide information identifying recycling facilities and centres which prepare for re-use and treatment in order to comply with the provisions of the Directive. Until these requirements are implemented uniformly across the EU and dedicated re-use facilities are established, it is likely that there will be differences in approach towards implementing the WEEE Directive.

Example 4

Adverse effect on the WSR

Illegal metal waste trade between EU and non-EU countries

Related legislation

National legislation on waste, Basel Convention

Explanation of the situation

Metal waste (especially copper, aluminium and iron waste) is brought from non-EU countries to EU countries to be sold in scrap yards which offer the best price. Usually prices of metal waste in EU countries are higher than (neighboring) non EU-countries. These transports are usually performed by natural persons from non-EU countries without TFS documents. After being controlled by customs these persons are released and the waste is kept in custody. It is not possible to obligate the persons responsible to recover the waste and it is not possible to facilitate a take-back as the repatriation obligation only concerns hazardous waste (this is possible due to provisions of the Basel Convention) as Regulation No 1013/2006 is not applicable in this case.

Example 5
Adverse effect on the WSR
Waste registered under REACH regulation is declared as end of waste
Related legislation
Regulation (EC) No 1907/2006 of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency.
Explanation of the situation
Some companies attempt to import waste as a substance registered under REACH regulation. Companies claim the substance is product, not waste due to REACH registration. An example can be lead paste, which is registered in REACH under the name: "Waste, lead battery reprocessing". It is possible to register any substance in REACH, which is then subject to dossier evaluation. This process is often lengthy. Registration in REACH does not automatically mean that the substance cannot be considered as waste. Some member states are in a process to change national legislation to prevent loopholes of specific wastes, like used oil.

Example 6
Adverse effect on the WSR
Abuse of end-of-waste criteria
Related legislation
Waste Framework Directive (2008/98/EC) (Article 6) and national legislation on waste
Explanation of the situation
<p>Article 6 of the Waste Framework Directive states that certain specified waste shall cease to be waste within the meaning of point (1) of Article 3 when it has undergone a recovery, including recycling, operation and complies with specific criteria. Where criteria have not been set at Community level, Member States may decide case by case whether certain waste has ceased to be waste taking into account the applicable case law. Some countries already developed such end-of-waste criteria for certain wastes, while in other countries they are still considered waste. An example of this can be alternative fuel which has obtained end-of waste status in some countries, whereas in other countries it is considered waste (EWC entry 19 12 10). It is difficult and time consuming to verify at authorities or notified bodies in other countries whether the end of waste claims is right.</p> <p>In this situation Article 28 of Regulation No 1013/2006 applies, none the less this situation can cause problems in cases of take-back in accordance with Article 24 of Regulation No 1013/2006.</p> <p>Competent authorities are given 2 specific roles in the End of Waste Regulations introduced to date:</p> <ol style="list-style-type: none"> 1) The competent authority may request to inspect the quality management system; further to such request the producer must provide access to the quality management system. 2) The competent authority may request to inspect the statement of conformity required for each consignment; further to such request the producer must make a copy of the statement of conformity available.

While these measures allow the competent authority of dispatch to exercise control over the movement of EOW material, it is not reasonable to expect that competent authorities are in a position to check all statements of conformity. But if an inspected statement of conformity, which is based on complying with the end of waste criteria set down in the regulations, is satisfactory to one competent authority and not to another, then the process would appear to be undermined. The remit assigned to competent authorities under the existing EOW regulations is very limiting in scope and would appear to require clarification.

Example 7

Adverse effect on the WSR

Plastic waste containing flame retardants (such as PBDE, PFOS...) shipped as green listed waste

Related legislation

Amendment to Annexes IV and V of Regulation 2004/850/EC on persistent organic pollutants - POPs

Amendment of Decision of 2000/532/EC on a list of wastes

Differences in the classification of plastic wastes containing poly-brominated flame retardants

Explanation of the situation

According to the amendment of the EU-POP Regulation (annexes IV and V) limits* for destruction of wastes containing the “newly listed POPs” (such as PBDE, PFOS...) have been set.

In this context transboundary movement of plastics containing PBDE or PFOS in an amount exceeding these POP-limits shall be monitored and in specific cases prohibited, if material recycling is foreseen.

Up to now in many countries in Europe plastic wastes from WEEE containing PBDE as flame retardant (e.g. monitor or TV-casings containing up to 15% of PBDE) are declared as plastic waste on the Green List and shipped to developing countries such as China and India where the waste is recycled into new articles. Studies have shown that plastics containing POP-BDEs and other brominated flame retardants have been recycled in the production of articles for which no flame retardancy is required including children’s toys, household goods and video tapes (Hirai and Sakai 2007; Chen et al 2010). Some of these products enter the European market again.

The persons initiating these shipments and even authorities argue that there is only an entry for plastics on the Green List and that there is no entry for plastic wastes containing POPs in an amount rendering them hazardous in the European Waste List.

According to the Amendment of the EU Waste List and the Framework Directive (hazardous properties – Annex in form of a Regulation) wastes containing the “newly listed POPs”, which exceed the limit for the definition as POP-waste are not automatically considered hazardous waste. The concentration limit at which such wastes are to be considered hazardous waste has to be laid down at national level.

Authorities also face problems with sampling and analyzing to that limits are exceeded.

**) 1.000 ppm for the sum of the concentrations of tetrabromodiphenyl ether, pentabromodiphenyl ether, hexabromodiphenyl ether and heptabromodiphenyl ether*

Example 8
Adverse effect on the WSR
Waste falsely declared as animal by products and Animal by products falsely declared as waste
Related legislation
Animal by products regulation 1774/2002
Explanation of the situation
<p>The shipment of catering waste identified as Category 3 material (kitchen and canteen waste intended for composting or biogas treatment) is subject to the controls of the Animal By-product Regulations and is thereby excluded from the scope of Regulation 1013/2006. However, clarification would appear to be required as to whether the provisions of the Waste Shipment Regulations or the Animal By-product Regulations apply in relation to the shipment of brown bin waste, comprising mixtures of biodegradable kitchen and canteen waste and garden and park biodegradable waste. Added to this issue is the occasional extraneous material found in brown bin waste.</p> <p>Waste collectors collect all kinds of organic/oil residues to sell it to bio-gas installations. The different kinds of wastes and animal by products are mixed during storage and collection (mixing in the tank truck). During transport the waste documents are changed to the commercial document of the regulation 1774/2002 for cat. 3 material. This more easy than the notification procedure that is required for these kind of mixtures of wastes.</p> <p>The effect is that it is not possible to follow the waste and that residues of the bio-gas installation contain prohibited contaminations. There are examples of high concentrations of heavy metals. In other situations companies declare mixtures of animal by products and wastes as waste to prevent veterinary inspections. This leads to a risk for food safety.</p> <p>Companies abuse the different policies of member states about waste and animal by-products. For some the source of the material is leading for others the destination.</p>

Example 9
Adverse effects on the WSR
Waste falsely declared as products
Related legislation
European harmonized product norms (CE marking) related to construction material. National standards for construction material
Explanation of the situation
<p>Wastes are pre treated to comply with harmonized standards for physical properties for construction material. For example concrete and tarmac are broken to a size that meets the requirements for a standard. The material is tested by a notified body and a certificate is made up. The practice is that is hard to make clear in court that CE marking on a product does not automatically mean it complies to all end of waste criteria. Asphalt and concrete constructions elements were mentioned as examples.</p> <p>Most harmonized norms for construction material do not include environmentally related requirements. Some member states have additional national standard for emissions of the material. It has to be mentioned that also the certificates for emission standards are wrongly used to proof that the material complies to construction requirements.</p>

Example 10
Adverse effects on the WSR
Shipments of mixed wood with possible contaminants
Related legislation
Subsidies on bio-mass for electricity production
Explanation of the situation
<p>One of the effects of the subsidization on renewable energy from wastes is the strong acquire of substrate for biogas production and power plants. Wood waste of different origins is mixed, including painted, creosoted or chemically conserved wood. The exact composition of the substrate-mix is often not known. This could lead to shipments that are declared falsely as green listed waste. Environmental effects could occur if the output material is used as fertilizer.</p>

4. Common elements

From the examples and the discussion the following common elements have been identified:

- The exemptions in the waste shipment regulations cause unclear situations, because of gaps among the different legislation and lack of (uniform) definitions.
- Product and substances legislation are used to consider a substance as end of waste. The criteria in this legislation do not always match with the criteria from the waste framework directive and waste shipment regulation.
- National financial instruments like taxes and subsidies have a side effect in TFS. Companies are able to find international shipping routes to avoid the taxes or to make profit of the subsidies.

In the overall policy to a circular economy it is important to prevent these adverse effects in an early stage. Impel is advised to take these common elements into account in other projects like the “end of waste project” and Practicability and Enforceability checks of new legislation. However more important is that policy developers and legislators are aware of these side effects.

ANNEX I: Terms of Reference

1. Project details

Name of project
Tool to review the impact of new and existing legislation on TFS (TRIT) 2014/20

2. Scope

2.1. Background	<p>EU environmental legislation can have (undesirable and/or unforeseen) impacts on the management of waste. New routes and treatment facilities could emerge, requiring inspection authorities to revise their inspection planning and targeting. Examples are bans on land filling certain waste streams, end-of-waste criteria, the WEEE-Directive or the Packaging Directive and loopholes in REACH.</p> <p>The IMPEL TFS 2013 conference recommended to the TFS network to consider developing a tool to assess the impact of existing and new legislation on transfrontier shipments of waste. TFS should take the lead as the unforeseen consequences of poor environmental legislation can be/ is frequently illegal export due to oversight of waste treatment being inevitable fragmented across the Union. It is likely that few legislators realise the consequences of 'technical fix' or single issue legislation. If well publicised, it would be a strong message for legislators to look more holistically at how their regulations will be implemented, especially if it came from TFS regulators. Export seems to be the 'get out of jail card' for poor regulations, with developing countries suffering many of the consequences, e.g. where a regulation leads to orphan waste streams export is seen as the solution to stockpiles in the producing country.</p>
2.2. Directive / Regulation / Decision	<ul style="list-style-type: none"> • Directive 2008/98/EC on waste (Waste Framework Dir., WFD) • Regulation (EC) No. 1013/2006 on shipments of waste (Waste Shipment Regulation, WSR)
2.3. Article and description	<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>
2.4 Link to the 6th EAP	<p>Art.3 EAP: Strategic approaches to meeting environmental objectives:</p> <p>Art.3 (1). Development of new Community legislation and amendment of existing legislation, where appropriate;</p> <p>Art.3 (2). Encouraging more effective implementation and enforcement of Community legislation on the environment and without prejudice to the Commission's right to initiate infringement proceedings. This requires:</p> <ul style="list-style-type: none"> • increased measures to improve respect for Community rules on the protection of the environment and addressing infringements of environmental legislation;

	<ul style="list-style-type: none"> • promotion of improved standards of permitting, inspection, monitoring and enforcement by Member States; • a more systematic review of the application of environmental legislation across the Member States; • improved exchange of information on best practice on implementation including by the European Network for the Implementation and Enforcement of Environmental Law (IMPEL network) within the framework of its competencies;
2.5. Link to MASP 2013-2015	Strategic goal 1: Promoting more coherent design and implementation of environmental law.
2.6. Objective (s)	<p>The aim of the tool could be to ensure that new (and existing) legislation does not lead to an increase in illegal shipments and loopholes to be exploited by organised crime (such as in the case of the WEEE Directive) or more low level but persistent offences. Enforcement agencies are all struggling with resources (20% of authorities have had a reduction in staff numbers/ inspections over the last two years) and any means of not exacerbating illegal shipments should be looked at. Improvements to current Directives as they are amended would allow us to focus our resources.</p> <p>The assessment tool aims therefore to :</p> <ol style="list-style-type: none"> 1. Show regulators the unintended consequences of new legislation and advising how to avoid or minimise future problems; 2. Use the outcomes of the assessment to support the drafting of the inspection strategies of competent authorities; 3. Use limited resources more effectively.

3. Structure of the project

3.1. Activities	<ul style="list-style-type: none"> • Collect examples of where loopholes and consequences were identified (e.g. collection treatment rates) • Development of a checklist; • Testing and revising the checklist; • Draft recommendations to develop the checklist further into a web-based tool. <p>The project team will meet mostly virtually and will try to have meetings back-to-back with other TFS meetings in 2014, such as the annual TFS conference and the NCPs Best Practice meeting. The project team will make use of other relevant tools developed by IMPEL, such as the Practicability and Enforceability checklist.</p>
3.2. Product(s)	Checklist and recommendations for follow up.
3.3. Planning (Milestones)	<ul style="list-style-type: none"> • Approval ToR – December 2013 • Project team meetings – Throughout 2014 • Testing of the tool – April/May 2014 • Finalization – September 2014 • Adoption checklist and recommendations – December 2014

4. Organisation

4.1. Lead	To be decided
4.2. Project team	Tbd
4.3. Participants	Tbd

5. Quality review

By IMPEL-TFS cluster

6. Communications

6.1. Dissemination of results	Website, Basecamp, E-mail
6.2. Main target groups	IMPEL network, European Commission, ENVI Committee, NGOs working on EU environmental/waste legislation.
6.3. Planned follow up	Developing the checklist into a web-based tool in 2015.

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 (€)
• Project meetings in total (2014)					
<u>Meeting 1 (Workshop and project team):</u>					
No of Participants:					
Travel:					
Accommodation:					
Catering:					
Meeting venue:					
Sub-Total:					
<u>Meeting 2 (Project team):</u>					
No of Participants:					
Travel:					
Accommodation:					
Catering:					
Meeting venue:					
Sub-Total:					
<u>Meeting 3:</u>					
No of participants:					
Travel:					
Accommodation:					
Catering:					
Meeting venue:					
Sub-Total:					
• Consultant:					
• Translation:					
• Dissemination:					
• Attendance for Project Manager at Cluster meetings:					
• Other (specify): Travel costs of inspectors for joint inspections					
TOTAL	0	0	0	0	0
Human Resources	Project manager: 10 days Project team members: 5 days Other participants: 3 days				