

Shipments of Waste Enforcement Actions Project

LIFE17 GIE/BE/000480



Layman's Report

June 2024

LIFE agreement

Project title:	Shipments of Waste Enforcement Actions Project
Agreement number:	LIFE17 GIE/BE/000480
Coordinating beneficiary:	European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL)
Associated beneficiaries:	<ul style="list-style-type: none">◦ Dublin City Council - National TFS Office (NTFSO), Ireland◦ Environment Agency (EA), England◦ Environment and Resources Authority (ERA), Malta◦ Inspectorate of the Republic of Slovenia for the Environment and Energy (IRSOE)◦ Northern Ireland Environment Agency (NIEA), Department of Agriculture, Environment and Rural Affairs◦ Scottish Environment Protection Agency (SEPA)
Project duration:	01/07/2018 – 31/06/2024
Project budget:	EUR 1,133,980
EU contribution (maximum):	EUR 667,869
Project location:	Europe



Shipments of Waste Enforcement Actions Project

The *Shipments of Waste Enforcement Action Project*, shortened to “LIFE SWEAP”, was undertaken between 2018 to 2024 with a focus on building inspection and enforcement capacity for trans frontier shipments of waste (TFS).



The Project was led by the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) and its associated beneficiaries:

- Dublin City Council - National TFS Office (NTFSO), Ireland
- Environment Agency (EA), England
- Environment and Resources Authority (ERA), Malta
- Inspectorate of the Republic of Slovenia for the Environment and Energy (IRSOE)
- Northern Ireland Environment Agency (NIEA), Department of Agriculture, Environment and Rural Affairs
- Scottish Environment Protection Agency (SEPA)

LIFE SWEAP continued IMPEL’s ongoing Enforcement Actions work targeting illegal transboundary waste shipments, with additional focus and resource facilitated by funding from the LIFE Programme of the European Union.

The IMPEL network has led enforcement activities since 2003. Through LIFE SWEAP, IMPEL set out to intensify European and international cooperation, promote joint enforcement operations and provide both inspectorates and law enforcement agencies with a suite of innovative tools and “on the ground” training.



Waste trafficking

The illegal shipment and management of waste is a lucrative, widespread and growing crime throughout the world. It is widely considered to be a high-profit, low-risk crime that is hard to detect, investigate, and prosecute.

Waste can be a valuable resource, bringing environmental benefits, when properly controlled and sustainably managed. This is the case when it is recycled and used as secondary materials, in place of virgin materials, and contributing to a more circular economy.

However, illegal traders – including organised crime groups - bypass existing rules and safeguards, resulting in environmental crime in the EU and in third countries. This “waste trafficking” undermines circular economy principles and has devastating consequences for environmental and human health.

Waste trafficking is a large scale, global issue. In the EU alone, it is estimated that between 15% and 30% of waste shipments might be illegal, amounting to EUR 9.5 billion annual revenues from the illicit waste market¹.

The EU has stepped up its response by strengthening regulation to tackle unsound waste management and environmental crime. The EU’s Waste Shipment Regulations (WSR) contain several measures to prevent the illegal shipment of waste. These include obligations for Member States to carry out waste shipment inspections and to cooperate with other Member States.

The EU’s increased response also reflects a regulatory shift at the global level, as evident in the policies of the Basel Convention, the Hong Kong Convention and other international initiatives.






The overall aim of LIFE SWEAP was to support the EU response by helping environmental regulators and law enforcement agencies to detect, disrupt, and prevent illegal waste trafficking.

¹ https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_5918 (accessed 15/05/2024).



Project objectives

LIFE SWEAP aimed to contribute to the Circular Economy package, waste management principles and targets by:

Objectives	Actions
 <p>Increasing the capacity of the various actors in the enforcement chain.</p>	<ul style="list-style-type: none">• Custom officer training• Inspector exchanges• Online training and webinars• Best Practice meetings
 <p>Increasing inspections and enforcement actions.</p>	<ul style="list-style-type: none">• Coordinated inspections
 <p>Developing and demonstrating innovative tools and technology.</p>	<ul style="list-style-type: none">• Inspection and Reference Applications• Mapping waste shipments with GIS• GPS tracking of waste shipments
 <p>Intensifying collaboration.</p>	<ul style="list-style-type: none">• International collaboration• Dissemination activities• Industry guidance
 <p>Establishing an EU-wide dataset based on inspection data that supports the development of intelligence products.</p>	<ul style="list-style-type: none">• Intelligence products• Nominal data exchange



Capacity building and online training

Customs officer training

To help encourage waste shipment compliance checks and build officer capacity, LIFE SWEAP delivered specialist training to 159 customs officers from 29 European countries.

Customs officers have access to critical information and can play an important role in checking cross-border waste shipments. However, not all customs services in EU member states actively check compliance with waste shipment regulations. Officer awareness of the evolving waste shipment regulations is often limited.

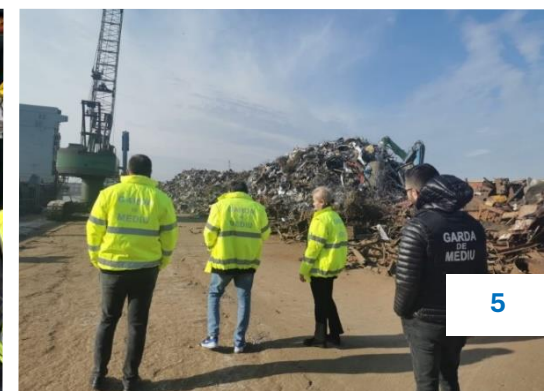
Between 2018 to 2022, in-person training was delivered in Estonia, Cyprus, Albania, Spain, UK and Romania by waste shipment inspection experts from the Netherlands, Poland and other EU competent authorities. The curriculum provided an introduction to European Waste law, with a focus on shipment-specific legislation. This included the Basel Convention, EU Waste Shipment Regulation, European Waste Catalogue and the Waste Electrical and Electronic (WEEE) Directive.

The training familiarised the participants with waste shipment documentation and useful online resources that can provide ‘in-field’ assistance. The expert presentations were mixed with practical case studies on a selection of challenging waste streams and field trips to local ports.

During training, customs officers made valuable connections with colleagues in their national competent authority for the Waste Shipment Regulation. Encouragingly, there were also indications that seizures of illegal waste shipments increased in several participating countries following the training.

“ Following this course, we had multiple illegal waste seizures at the port which after contacting the competent authority, the take back procedure was initiated. This course helped in getting more familiar with illegal waste. ”

Customs Officer feedback (anonymous) - Participant at SWEAP training in Valencia, Spain, 2022



Inspector exchanges

LIFE SWEAP extended IMPEL's ongoing inspector exchange programme between 2019 to 2024. Each exchange was hosted by a European competent authority with well-established waste shipment enforcement regimes, with the aim of providing visiting inspectors with valuable learning opportunities.

By visiting a host country, inspectors from one or more countries were able to observe inspection and enforcement practices in another jurisdiction. Where possible, the visiting inspectors participated in joint inspections at a border point. The exchanges included road inspections and inspections at ports, as well as inspections at waste producers and waste management company sites.

During the Project, a total of 146 inspectors from 22 countries participated in 15 exchanges. The exchanges were hosted in Ireland, Northern Ireland, Scotland, Netherlands, Sweden, Belgium, Austria, England, Germany and Portugal.

During the exchanges, participants developed their practical and procedural knowledge. Practical considerations included how to open containers safely, analyse for fumigants, inspect waste management sites and assess different types of waste. Procedural considerations included how to prioritise waste streams, profile shipments for inspection, and ensure the 'chain of custody' in illegal shipments. The benefits of collaborating with partner agencies and involving both neighbouring countries and other national regulators in inspections were heavily emphasised during the exchanges.

“ The exchanges are a good way to get to know each other better in practice and also to learn from and understand each other ... The small number of participants promotes contact between the participants. In my opinion that is a good thing. ”

Arno Vink, The Human Environment and Transport Inspectorate (ILT), the Netherlands - Participant at inspector exchanges in Germany and Belgium

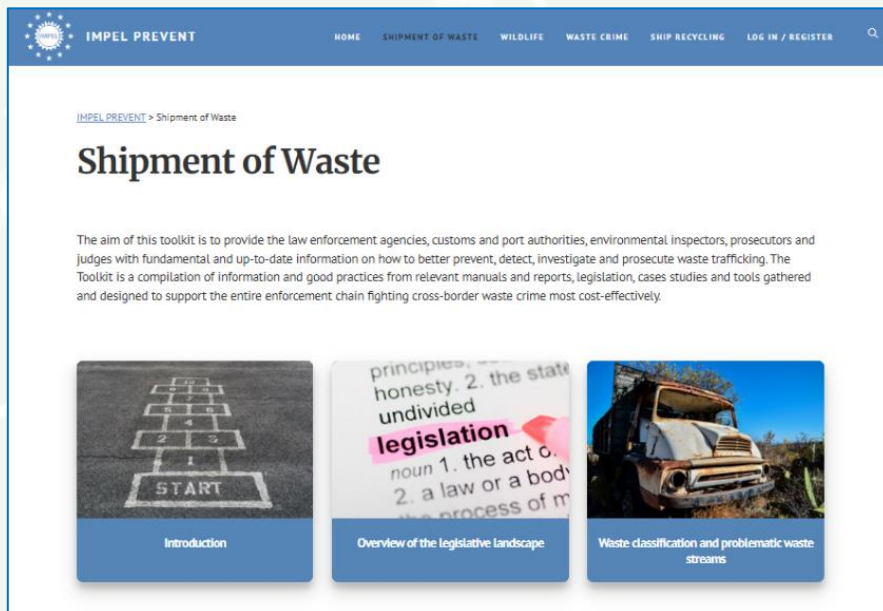


Online training

As part of LIFE SWEAP, IMPEL developed the **PREVENT** training portal to provide an online repository of training and capacity-building materials for the law enforcement community.

At the time of reporting, PREVENT has 361 registered users with access to four training modules: (1) Shipment of waste; (2) Ship recycling; (3) Waste crime; and (4) Wildlife.

The PREVENT portal is a collaborative work by projects coordinated by IMPEL and executed with various consortium partners. The toolkit will be kept up-to-date and transferred from impel-prevent.eu to the IMPEL website following the completion of LIFE SWEAP.

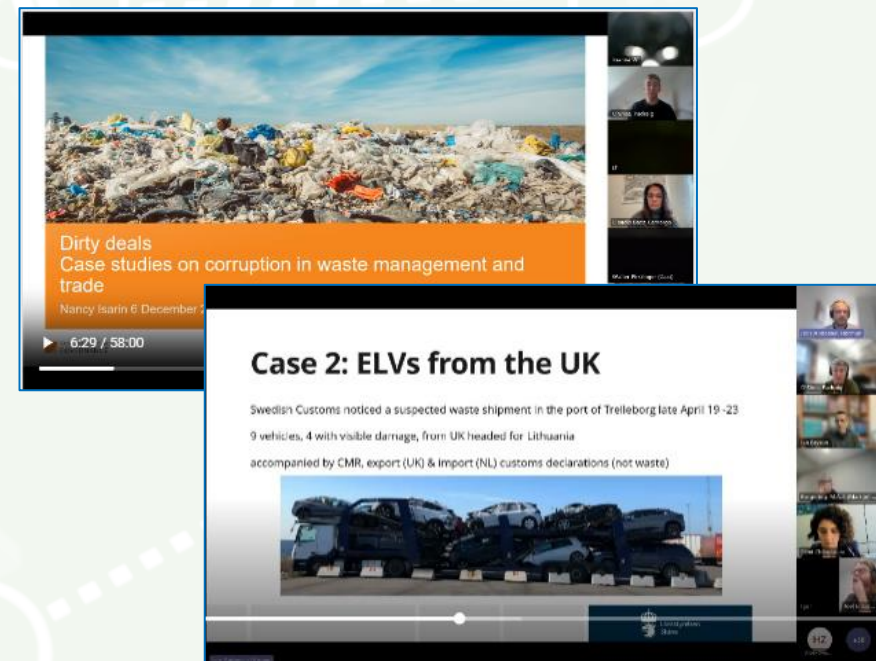


Webinars

A total of 23 webinars were delivered as part of LIFE SWEAP. The aim was to consider case studies, facilitate knowledge exchange and discuss problematic waste types amongst waste shipment experts in an online forum.

Webinar topics included, for example, illegal shipments of challenging waste types, ship recycling, GPS tracking, organised crime groups, corruption and topical issues arising during the COVID-19 global pandemic.

LIFE SWEAP representatives also delivered guest lectures as part of CEPOL training events and training to Prosecutors and Judges through European Law Academy.



Best practice meetings

From 2019 to 2023, LIFE SWEAP hosted five annual 'Best Practice' meetings, including three held in-person at venues in Dublin (Ireland), Ljubljana (Slovenia) and Edinburgh (Scotland, UK). In 2020 and 2021, the meetings were hosted online due to travel restrictions related to the COVID-19 global pandemic.

The Best Practice meetings were attended by waste shipment experts representing IMPEL member countries from throughout Europe. The meetings provided participants with an opportunity to share and discuss interesting waste shipment case studies through presentations, workshops and port visits.

Overall, the participants highly valued the Best Practice meetings and concluded that the format should continue beyond the life of the Project to ensure that the transfer of specialist knowledge, insights and innovative techniques will continue.

“ The five Best Practice meetings held over the course of LIFE SWEAP have been important capacity building activities for the Project. They have brought inspectors together to share their experiences and learn from each other. They have led to interesting discussions amongst participants and a greater understanding of the challenges regularly encountered, which has led to an increased understanding and better enforcement of the Waste Shipment Regulations. ”

Brian Heffernan, National TFS Office, Dublin City Council, Ireland





Coordinated inspections

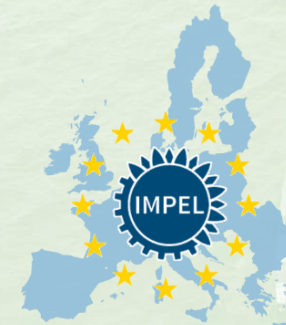
Between July 2019 and May 2024, SWEAP coordinated, facilitated, and gathered data from Europe-wide inspections of the waste management chain. The inspections were primarily undertaken by the competent authorities of participating IMPEL member countries at waste management sites and during waste shipments. This core Project activity was supported by national Customs and Police authorities.

As of May 2024, 32 countries participating in the project had conducted 90,237 inspections, more than double the Project's target. Almost half of these inspections were found to contain waste. In the 44,852 waste inspections, 8,080 violations were identified, a violation rate of 18%.

Throughout the Project, the inspection results were summarised, trends analysed, and problematic waste streams identified in interim reports. This information helped the participating European competent authorities to maximise their effectiveness through targeting of inspections and completion of risk assessments.



90,237
Inspections*



Performed by
32
Member Countries



44,852
Waste shipment
Inspections*

8,080 Violations*

* July 2018 – May 2024



Innovative tools and technology

Inspection and Reference Applications

The mandatory reporting of waste inspection data places time-consuming administrative demands on the limited personnel available to Europe's competent authorities. LIFE SWEAP developed two convenient software applications (Apps) to help address this issue.

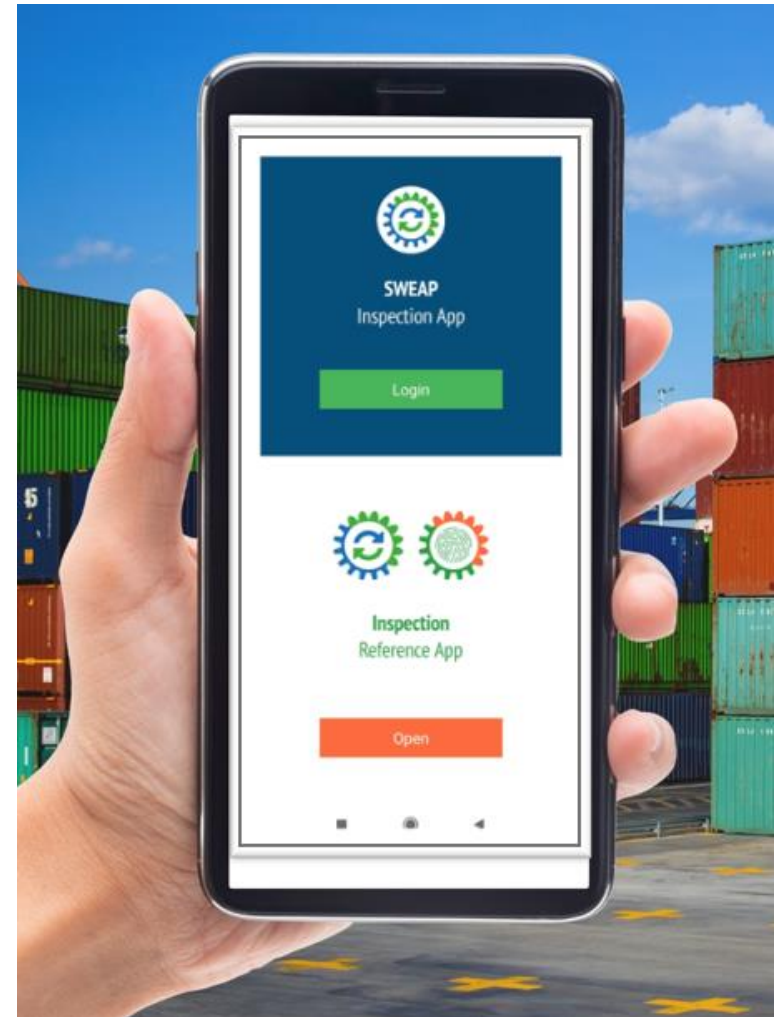
Firstly, a ground-breaking [Inspection App](#) was developed to provide a cost-effective, paperless solution for collecting, analysing and reporting inspection results, and violations detected. The App will help competent authorities to meet their mandatory reporting obligations. This includes those under EU Article 50 of Regulation 1013/2006 on waste shipments² and the Basel Convention.

Data from the App gives a much clearer indication of the level and type of illegal shipments taking place. This can highlight emerging trends in illegal activity.



The Inspection App is in use by inspectorates across Europe. At the time of reporting, 202 law enforcement officers from 38 European competent authorities were registered to use the App.

In support of the Inspection App, a complementary [Reference App](#) was developed. The Reference App provides easy online access to legislation, guidance, description of waste types, searchable databases and a decision tree on the export of waste for recovery.



² Or equivalent national regulations for non-EU Member States.

Mapping waste shipments with GIS

A powerful **GIS (Geographical Information System) mapping tool** was developed to graphically present the waste shipment inspection and violation data provided by Project participants.

The tool uses *Spotfire*, an analytics and data visualisation platform, to map shipments across the globe that enter and leave Europe. The tool generates open-source maps and graphs showing:

- The waste streams involved in illegal shipments
- Countries of origin and/or destination
- Violation type
- Competent authority co-operation (e.g., Customs and Police)
- Penalty applied (including repatriations)

By recording the location of each inspection, inspectors can monitor waste flows and assess whether there is any evidence of ‘port or road hopping’. This enables inspectors to locate their subsequent inspections in an alternative destination with a view to increasing the detection rate.

In addition to helping competent authorities, customs and other enforcement bodies to identify illegal shipments, the tool facilitates annual reporting to the European Commission and the preparation of Basel national reports.



GPS tracking of waste shipments

LIFE SWEAP undertook a trial and assessment of the use of GPS tracking technology for monitoring and enforcing waste shipments. Seven competent authorities, representing six countries, were recruited for the trial:

1. Czech Customs Administration
2. Czech Environmental Inspectorate
3. Environment Agency, England
4. Environment and Resources Authority, (ERA) Malta
5. National TFS Office, Dublin City Council, Ireland
6. Northern Ireland Environment Agency (NIEA)
7. State Environmental Service (SES), Latvia

All participating authorities undertook technical assessments of the GPS tracking devices and sought legal permissions to deploy in operations. During 2022 and 2023, three of the seven authorities - SES, ERA and the Czech Customs Administration - succeeded in deploying devices to assist with live investigations.

Overall, trial participants concluded that GPS tracking technology has the potential to provide unique, otherwise unattainable, information that could be hugely beneficial in resolving complex cases. Deploying GPS trackers can potentially increase the efficiency and effectiveness of inspections and improve resource prioritisation. However, to realise this potential, significant resources are required to address the corresponding legal complexities, secure permissions, undertake specialised surveillance, and overcome technical challenges.

Participants noted the importance of selecting accurate, easy-to-use GPS tracking devices that can be safely and discretely deployed in covert surveillance activities.

Four of the participating authorities were unable to deploy devices during the life of the Project, highlighting the many barriers to using the GPS trackers faced by competent authorities. These were mostly legal barriers due to the covert nature of GPS tracking. Notably, national policies and the need to ensure compliance with Article 8 of the European Convention on Human Rights were primary considerations for all participants.





Intelligence gathering and sharing

Nominal data exchange

LIFE SWEAP made significant progress in the development of an innovative Europe-wide dataset based on waste shipment inspection data. The data was collected from participating IMPEL member countries via the Project's Inspection App and 'bulk data' uploads.

Significantly, the new dataset introduced additional 'nominal' waste shipment data that can be used to develop intelligence products. The dataset can also be used to identify waste movement trends.

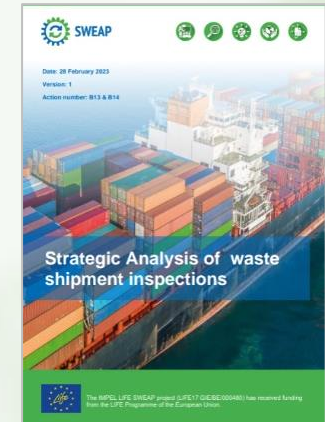
Successful engagement with Europol secured agreement to share the nominal data collected. Europol's involvement in this action also provided a robust framework for data collection and sharing. This ensured that nominal data gathered via the Inspection App could be collected and shared among IMPEL members, within Europol's legal framework. Input of the data into Europol's SIENA³ system makes it available to Europol's intelligence analysts.

Use of the dataset, hosted by IMPEL, will continue after the Project and an increased participation by IMPEL members is expected to further enhance the breadth and quality of the available data.

Intelligence products

The Project's emerging waste shipment dataset supported the development of 14 intelligence products. These helped to demonstrate how intelligence could inform and direct regulatory and enforcement activity.

The varied intelligence products, combined with additional training and support provided through the Project, also facilitated both regional and international collaboration, including multiple joint operations.



“ Inspections, shared intelligence and investigations are key to tackling illegal shipments of waste. The LIFE SWEAP project's new inspection dataset increases the intelligence capacity of regulators and law enforcement bodies. As it develops, it has the potential to provide intelligence that will help with the detection of criminality in the international waste trade, and to inform the design of appropriate interventions. ”

Ben Ryder (Illegal Waste Exports & Operational Intelligence Manager), Environment Agency, UK

³ Secure Information Exchange Network Application



Collaboration

International collaboration

LIFE SWEAP representatives undertook extensive global and regional networking activities throughout the life of the Project. The primary aims of these activities were to improve the IMPEL network's capacity for verifying the final destination of waste shipments, and to facilitate repatriations of waste shipped illegally from Europe.



To reach and engage with countries that receive European waste shipments, the Project successfully collaborated with appropriate EU networks, international entities, and relevant projects, including:

- **Academy of European Law (ERA)**
- **Basel, Stockholm and Rotterdam Conventions**
 - Conference of the Parties
 - ENFORCE⁴ Roadmap
- **European Network of Prosecutors for the Environment (ENPE)**
- **European Union Agency for Law Enforcement Training (CEPOL)**
- **Europol** (Inspection data integration within SIENA⁵)
- **OECD⁶** (training on inspections in East Eastern Europe)
- **OPFA⁷** Waste Project (SWEAP App providing an “ideal dataset”)
- **UNODC⁸ UnWaste Project** (collaboration with South-East Asian countries)
- **World Customs Organisation** (Asia-Pacific Plastic Waste Project and Operation Demeter VIII)

In addition, a policy paper to inform the Revision of the Waste Shipment Regulation was submitted to the European Commission covering proposals on enforcement and co-ordination of action, shipments to non-OECD countries and jurisdiction issues.

⁴ The Environmental Network for Optimizing Regulatory Compliance on Illegal Traffic

⁵ Secure Information Exchange Network Application

⁶ Organisation for Economic Co-operation and Development

⁷ Operational FACility fighting illicit WASTE trafficking

⁸ United Nations Office on Drugs and Crime

Industry guidance

LIFE SWEAP used communication as a compliance tool to help improve levels of compliance within the waste shipment industry.

Between 2019 to 2024, LIFE SWEAP proactively engaged with waste industry representatives through meetings and a series of annual surveys. These activities were undertaken to identify areas of concern and gaps in the industry's understanding of waste shipment regulations. To help address the issues identified, guidance materials were developed for businesses involved in waste shipment activities.



The guidance included a set of 'Fact Sheets' for the following priority topics:

- Plastic waste (March 2020)
- Green listed waste (March 2020)
- Allowed levels of contamination for non-hazardous waste (April 2023)

The Fact Sheets were publicised via the [SWEAP.eu](https://www.sweap.eu) website and social media channels.



Industry Fact Sheet Series to Support Compliance with Waste Shipment Rules

August 19, 2020 // by Nancy Isarin

The LIFE SWEAP Project started to publish a series of fact sheets for Industry involved in shipping of waste...

[Read More](#)



LIFE SWEAP Launches Second Industry Survey

May 28, 2021 // by Nancy Isarin

The LIFE SWEAP project has launched its second survey aiming to assess the assistance industry may need to ...

[Read More](#)



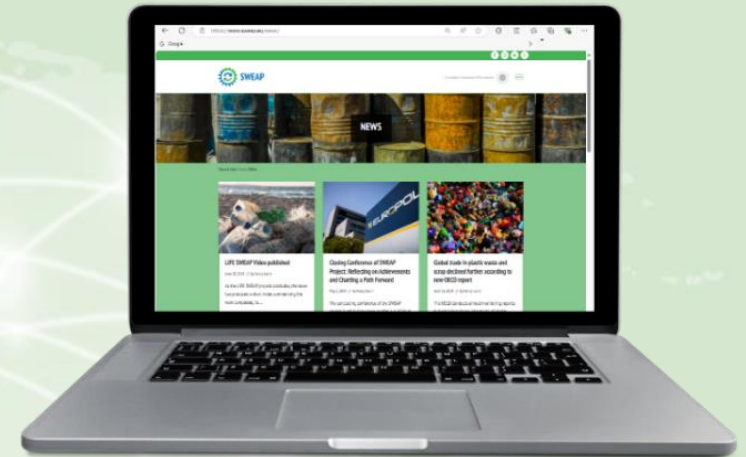
Dissemination activities

Project partners used a range of communication methods to raise awareness of the Project and to disseminate the results to enforcement agencies, industry representatives, policy makers and other key stakeholders. The dissemination methods and media included:

- [SWEAP.eu](https://www.sweap.eu) website
- BaseCamp intranet
- Professional networking events
- Web news releases
- Social media
- Webinars
- Report publications
- Information leaflets
- Video



Video link



The concluding conference of the SWEAP project took place from 2nd – 3rd May 2024 at the headquarters of Europol, the Hague, the Netherlands. The event provided an opportunity to review the Project's accomplishments and discuss future strategies for effectively closing the waste compliance and enforcement chain.

“ I'm very pleased to see that all the achievements under the SWEAP project supported implementation of the Basel Convention, as the only legally binding treaty that requires strict controls over the trans boundary movement of hazardous and other wastes at the global level ... The outcomes of the SWEAP project should be brought to the attention of policy makers both at the national and global levels, so that lessons may resonate more broadly and drive more comprehensive responses to illegal traffic. ”

Rolph Payet, Executive Secretary for the Basel, Rotterdam and Stockholm Convention



Next steps

Europe's success in tackling illegal waste shipments will require on-going inspections, data collection, and further capacity building. Greater understanding of the complex interplay between waste trafficking and other types of crime such as money laundering and corruption are also needed. Strategic and operational partnerships must be expanded and intensified, and the potential of new technologies harnessed if Europe is to combat this complex and growing crime.

Beyond the life of the Project, IMPEL will continue with priority activities, including participation in international enforcement campaigns. IMPEL will host the Inspection and Reference Apps. This will facilitate the collection and sharing of data for mandatory reporting and intelligence gathering purposes. Inspector exchanges, Best Practice meetings and related capacity-building actions will also continue.

Find out more

For further information, or to access the project's reports, tools and training materials, visit the SWEAP web site or e-mail us.

Project contact details

Name: Katie Olley (Project Manager)
Address: IMPEL Network
Chemin des deux maisons 73, box 3
1200, Brussels
Belgium
E-mail: Katie.Olley@sepa.co.uk | info@impel.eu
Web: www.SWEAP.eu | www.IMPEL.eu



SWEAP web site link

