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Shipments of Waste Enforcement Actions Project: E4 – After- Life Plan

The IMPEL LIFE SWEAP project (LIFE17 GIE/BE/000480) has received funding from the LIFE Programme of the European Union.



After-Life Plan

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List of keywords and abbreviations

Term	Definition
CEPOL	European Union Agency for Law Enforcement Training
DCC	Dublin City Council
EA	Environment Agency (England)
EC	European Commission
ERA	Environment and Resources Authority (Malta)
EU	European Union
IMPEL	EU Network for the Implementation and Enforcement of Environmental Law
IRSOE	Inspectorate of the Republic of Slovenia for the Environment and Energy
LIFE	The LIFE programme is the EU's funding instrument for the environment and climate action
NCP	Group of National Contact Points (one for each IMPEL member)
NIEA	Northern Ireland Environment Agency
NTFSO	National TFS Office (Dublin City Council, Ireland)
SEPA	Scottish Environment Protection Agency
SWEAP	Shipments of Waste Enforcement Action Project
TFS	Transfrontier Shipment of Waste
WEEE	Waste Electrical and Electronic Equipment
WSR	Waste Shipment Regulation

1.0 Introduction

The purpose of the After-LIFE Plan is to articulate how the actions initiated in LIFE-funded Shipments of Waste Enforcement Actions Project will continue after the project ends.

The first section of the plan provides a brief overview of the project and its work packages at the end of the project. The subsequent sections will set out the objectives of the 'after life' work and the methodology for measuring the work. The funding sources have been identified and will be set out in the main body of this report and the annexes.

1.1 Project Background

The EU has set up rules for waste management and targets for recovery of waste materials to minimise the risks associated with managing waste. European Regulation (EC) No 1013/2006 on shipments of waste (WSR) contains several measures to prevent the illegal shipment of waste. These include obligations on Member States to carry out waste shipment inspections and to cooperate with other Member States.

Since 2003, through consecutive 'Enforcement Actions' projects, the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) has encouraged co-operation between neighbouring countries, within jurisdictions, between competent authorities and between other enforcement bodies, such as the Police and Customs. IMPEL's initiatives have provided 'on the ground training' and encouraged a minimum level of inspections in participating countries.

IMPEL commenced the Shipments of Waste Enforcement Action Project (LIFE SWEAP) in 2018 with a focus on building transfrontier shipments of waste (TFS) inspection and enforcement capacity. The project is led by IMPEL over a six- year period, with the support of six associated beneficiaries:

- Dublin City Council (DCC) - 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)
- Scottish Environment Protection Agency (SEPA)

LIFE SWEAP is a continuation of IMPEL's Enforcement Actions work, with additional focus and resource facilitated by funding from the LIFE Programme of the European Union.

By expanding the members taking part in and benefiting from Enforcement Actions initiatives, LIFE SWEAP aims to:

- Increase the capacity of the various actors in the enforcement chain.
- Intensify collaboration.
- Increase inspections and enforcement actions.
- Develop and demonstrate innovative tools and technology.
- Establish an EU-wide dataset based on inspection data that supports the development of intelligence products.

Achieving these aims will contribute to the Circular Economy package, waste management principles and targets. This will help to detect, disrupt, and prevent illegal waste trafficking.

1.2 Illegal waste shipments and the Green Deal

The illegal shipment of waste remains a serious environmental, social and economic issue. In its Communication “Our Waste, Our Responsibility”¹, the Commission noted that “waste trafficking is one of the most serious forms of environmental crime and an area in which organised crime networks are active, both for intra-EU and extra EU shipments of waste. Coordinated enforcement campaigns indicate that between 15% and 30% of waste shipments might be illegal, amounting to EUR 9.5 billion annual revenues from the illicit waste market in the EU. In addition to environmental harm, waste trafficking also poses security threats, particularly in situations when criminal groups, involved in such shipments, are spread across several countries. It is therefore paramount that the EU and the Member States make the fight against waste trafficking a higher priority among enforcement agencies, improve cooperation between all relevant authorities and ensure that sanctions against criminal activities in the waste sector are truly deterrent.”

The following slide from DG Environment² shows the gulf that remains between imports to and exports from the EU. It is clear from what is presented that the EU has a considerable way to go to ensuring its Green Deal³. Enforcement of waste shipment rules remains pivotal in underpinning the initiative, as without it progress is unlikely. IMPEL recognises this and has undertaken to support the use of SWEAP tools for at least the medium-term, through new projects.

¹ eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021PC0708, retrieved 7 May 2024

² 3 May 2024, Presentation by Yorg Aerts, DG Environment

³ 5 COM(2019) 640 final.



Figure 1 - Slide from DG Environment presented at SWEAP Final Conference 3/5/2024

2.0 Short evaluation of Life SWEAP and results

The project has been very well received, both by participants and external partners. The Final Report provides an objective view of each activity foreseen (see Table 3 in particular). For the purposes of this report, the following key aspects were delivered:

- A European **network** of highly competent frontline waste shipment officers through best practice meetings, officer exchanges, webinars and training material. Peer-to-peer learning is seen as crucial in helping officers to navigate their way through this complicated area of regulation. The figure below shows the best practice meetings organised through SWEAP for the exchange of knowledge and training:

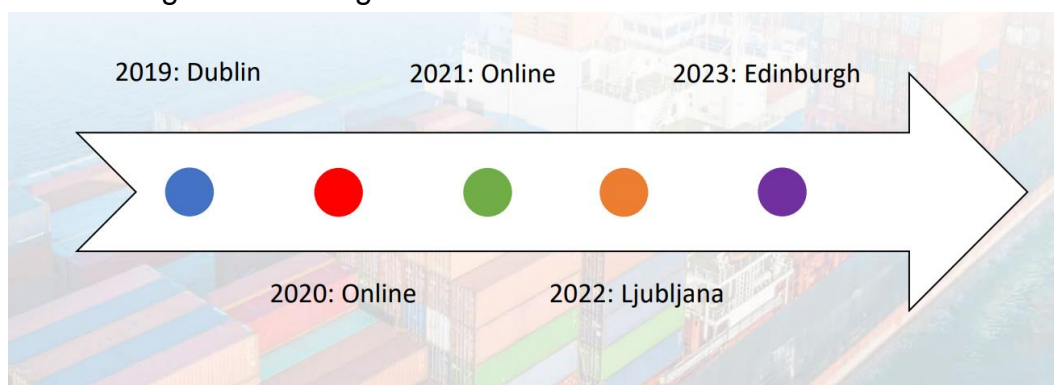


Figure 2- Best practice meetings

- Strengthened **customs capacity** in waste shipment inspections through dedicated customs training. This has led to increased seizures of illegal shipments and more interaction between national customs administrations and

competent authorities, and between IMPEL and the World Customs Organization

- **Regional networking** with Asian authorities and dissemination through ENFORCE has given the project visibility globally and closer working relationships with colleagues in other competent authorities. Direct liaison with competent authorities in other regions have also allowed the evolution of the “verification” spreadsheet, wherein officers can check the status of various sites of destination
- A comprehensive **inspection dataset** for the last six years. The data vocabulary is now formalised and allows data comparison as each agency is now reporting the same information. The data show the disruption of the pandemic, emerging waste streams of significance, detection and violation rates for each agency and the type of inspections they undertake. Closer working with Europol has now been established, and efforts are ongoing to assist additional authorities to submit its data to their SIENA system
- The tools: Reporting App, Prevent training portal, visualisation tools. The **Prevent portal** – developed over a number of years - is the outcome of several projects. It provides comprehensive learning materials for new and experienced officers alike. It has been updated regularly with new modules to fit with officers’ needs. A wholesale ‘refresh’ of the portal is now needed with the advent of the revised Waste Shipment Regulation
The **App** and its associated Content Management System have taken several years to develop and roll out. It is now used by over 200 officers across 53 authorities. Waste shipment officers, customs and Police use the reference module to assist them in their inspections. Discussions on financing the App for at least the After-Life period have also been lengthy. It was only with its long-term future secured that arrangements could be made for hosting. This is discussed further in the next section
- **Intelligence products** have been delivered during the project for use by inspectors to target their inspections
- In the **communications** arena, awareness-raising of IMPEL’s members’ efforts to detect and intercept illegal shipments and online presence. Infographics have been produced throughout the projects, and a video of the project has been released. Industry factsheets have also been published after consultation with industry representatives.

The ‘After-Life’ strategy is considered for each of these in section 3.

3.0 After-life strategy

3.1 Enforcement Actions Project

IMPEL has decided that it wishes to continue the majority of the SWEAP activities as an internal project, “Enforcement Actions” with the assistance of its members. Terms of Reference for the period 1 October 2024 to 31 December 2024 have been adopted and are annexed to this report. The funding cycle 2025-2027 also includes provisions for the next phase of Enforcement Action activities. The detail of the future of the project and joint inspections in particular were discussed with project participants in 2023 (as detailed in the B5 report.) It is envisaged that the Scottish Environment Protection Agency (SEPA) will continue to lead these projects with the assistance of the authorities listed in the Terms of Reference documents. The future work of IMPEL to embed SWEAP outcomes is shown below⁴:



Figure 3 Planned work for 2025-27

A further TOR will be drafted for the 2025-2028 cycle. This would cover best practice meetings, officer exchanges and allow monitoring of the effectiveness of training events by following up on joint operations and national dissemination of SWEAP training materials.

The projects will include the following:

1. **Officer development.** Exchanges hosted in Belgium, Slovenia and Germany are planned for Q4 of 2024. Further exchanges will take place (8 multi-country events) up to December 2027. A simple guide to hosting exchanges will be developed in January 2025, in an effort to expand the number of countries willing to host
Best practice meetings are also planned for each year. It may be that these will run back-to-back with the meetings of National Contact Points to maximise attendance
2. The submission and analysis of **inspection data**. These will be available for discussion at the Waste Enforcement Group set up under Regulation (EU)

⁴ Brian Heffernan, May 2024. Slide from SWEAP Final Conference
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2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste, should authorities submitting their data to Enforcement Actions so decide. It is anticipated that the dataset will also continue to be used to develop policy and be a reliable source of information for IMPEL member authorities and partners, such as the Basel Convention and UNODC. With this in mind, IMPEL is likely to adopt a formalised approach to releasing data, in line with that used by EU-Twix

3. The provision of the reporting **App and CMS**, with secure hosting. IMPEL published an invitation to tender for hosting and app development in July 2024⁵. One submission has been received at the time of writing. A session to assess the tender(s) is scheduled to take place at the end of August 2024. The new service should be available in October 2024, for a period of five years. The IMPEL Board confirmed that IMPEL intends to cover the costs associated with the app for at least the 'After-Life' period. Several upgrades will be made to the App e.g., the ability to redact records where an inspection leads to a prosecution, during the next phase of development. It will be necessary for authorities using the service to enter into a data protection agreement with IMPEL. These are expected to be ready for signing by May 2025. Additional translations of the app will be made available as required by authorities. The additional authorities which have confirmed that they will use the App in 2025 (subject to internal approval) and following the finalisation of the new hosting arrangements are Denmark, Republic of Ireland and Sweden. SEPA will provide training to 'onboard' officers from these agencies. Further guidance will be drafted (beyond that already available via Google Docs) on how to use the App. IMPEL may also explore video capture within the App, where budget allows. Several suggestions for amending the look of the backend 'look' of the CMS have already been made by five authorities. These will be incorporated in 2024 during the next sprint. This development will allow the App to be more user-friendly for inspectors when searching for particular shipments. The Enforcement Actions Team will also look to the Flemish example of linking in-fields reporting to case management systems so that compliance work can be streamlined. For example, warnings can be issued using data directly from the

⁵ [Request for Tender to host and develop a secure and GDPR compliant application for the recording of European waste shipment inspections | Impel](#)

App, using an API.

Form replies Form replies Form reply exports

Export form reply Q

View 301–400 of 39351

INSPECTION DATE	REFERENCE ID	AUTHORITY	MEMBER	INSPECTION TYPE	CONTAINER NUMBER	SOURCE	STATE	
19 Jun 2024	SL-IRSOP-2024-07-11-049	IRSOP [SL]	Uploader Temp	Transport inspection		Import	Close	...
19 Jun 2024	SL-IRSOP-2024-07-11-048	IRSOP [SL]	Uploader Temp	Transport inspection		Import	Close	...
19 Jun 2024	SL-IRSOP-2024-07-11-047	IRSOP [SL]	Uploader Temp	Transport inspection		Import	Close	...
19 Jun 2024	SL-IRSOP-2024-07-11-046	IRSOP [SL]	Uploader Temp	Transport inspection		Import	Close	...
18 Jun 2024	A-A-2024-06-18-037	Austria [A]	Walter Pirstinger	Transport inspection		App/Web	Close	...
18 Jun 2024	A-A-2024-06-18-035	Austria [A]	Walter Pirstinger	Transport inspection		App/Web	Close	...
18 Jun 2024	A-A-2024-06-18-036	Austria [A]	Walter Pirstinger	Transport inspection		App/Web	Close	...
18 Jun 2024	A-A-2024-06-18-033	Austria [A]	Walter Pirstinger	Transport inspection		App/Web	Close	...
18 Jun 2024	UK-GB-01-2024-06-18-012	Environment Agency [UK]	Dean Johnson	Transport inspection	MEDU4566350	App/Web	Close	...
18 Jun 2024	A-A-2024-06-18-034	Austria [A]	Christian Gesek	Transport inspection		App/Web	Close	...
18 Jun 2024	A-A-2024-06-18-032	Austria [A]	Walter Pirstinger	Transport inspection		App/Web	Close	...

Figure 4- Screenshot of Admin panel in content management system

Although the App is deliberately designed not to be a case system, development of the backend of the CMS should make it easier to identify inspections from the admin panel and update the outcome. This would improve the monitoring of inspection outcomes. Authorities could then link their case management systems to the CMS via the daily back-ups.

It is hoped that in the long-term, the app and CMS can be brought into the EU Commission's data architecture for waste shipments. Detailed discussions will be needed on this with competent authorities. DG Environment has considerable IT development work for waste shipments over the next two works to embed an electronic system to handle notifications and movements of green list waste. It is therefore unlikely that discussions on the app could take place before these elements are available

The **Prevent** portal will also be maintained by IMPEL. It will be significantly updated throughout 2025 to take the provisions of the revised Waste Shipment Regulation into account. Webinars will also be run periodically on new cases and changes to legislative provisions. These will be saved on Basecamp so that they are available to all IMPEL members.

It is envisaged that specific **guidance tools** will be updated and drafted during subsequent Enforcement Actions Projects. These include IMPEL Guide to Repatriating Waste, which will be updated by May 2026. Guidance on the export of end-of-life vehicles and parts will also be drafted by August 2026

The **visualisation tool** will be maintained by the SEPA. It will be adapted according to the needs of IMPEL members. These are likely to change with the revised WSR. A review of the tool will therefore be undertaken in May 2025

4. The “**verification**” **spreadsheet** will be maintained and moved to the IMPEL SharePoint. Its use will be promoted during best practice and NCP meetings
5. The provision of **intelligence reports** to be provided by the English Environment Agency. They will be based at the data coming in from the app and CMS, and trends in different waste markets and global events
6. It is envisaged that **joint regional inspections** will take place each year to galvanise effort amongst the authorities. These will be planned in advance so that they can be focussed and use intelligence, where possible. It is likely that at least one of the inspection periods will coincide with Operation Demeter, led by WCO
7. Work with **Europol** will continue. A meeting was hosted by Europol in July 2024 to explain to their National Contact Bureaux that “SWEAP/ Enforcement Actions” data is available and how it can be submitted to Europol. The effectiveness of this request will be assessed by IMPEL and Europol at the end of 2024. Any additional work needed to ensure that inspection data is sent to Europol, will be discussed at this point between IMPEL and Europol. Communication with the EU-Twix team will be maintained to keep abreast of reporting developments, and how the agency works with Europol
8. The Environment Agency will continue to develop **intelligence analysis** for authorities.

3.2 Communications

IMPEL will maintain the SWEAP website for a period of at least five years. Due to the official sensitivity of the content in some outputs, not all the LIFE SWEAP reports and resources are available on the project’s website; these include intelligence reports and the GPS report. It is likely that IMPEL will seek to move the SWEAP website into the IMPEL web architecture, but the domain name will be retained so that routing can be set up to the project site.

The website will include clear guidance to enable representatives of competent authorities to request any required reports. The deliverables (including recordings to the webinars) will remain accessible via Basecamp.

The video produced for the project was purposefully created in a way that the legacy aspects of SWEAP were given greatest prominence. This was so that it would have relevance in the After-Life period, and would be of use to IMPEL when promoting the project’s deliverables and the way may shape the scope of members’ work in combatting illegal shipments of waste.

The Associated Beneficiaries will maintain web pages hosting project information and links to the sweap.eu website. They are also active in a range of existing collaborative groups such as ENFORCE and the Asian Network. Building upon these ongoing relationships, beneficiaries will continue to seek opportunities to disseminate the project's results and recommendations. Budget has been included in the Enforcement Actions projects to enable this. It is also hoped that IMPEL's Waste and TFS Steering Committee will also disseminate the SWEAP activities and deliverables during their outreach work on wider waste management issues.

Networking activities with other European-funded and international projects, as well as with bodies/agencies and networks all over the world, related to the work of SWEAP has yielded knowledge, experience and good practices, which can be used by IMPEL and the Associated Beneficiaries in the years to come. Beneficiaries anticipate that dissemination opportunities may arise through ongoing participation in, and engagement with UNODC, UNEP, the Basel Convention Secretariat, the European Network of Prosecutors for the Environment (ENPE), EnviCrimeNet, and the European Union Forum of Judges for the Environment (EUFJE).

3.3 Activities not specifically covered by Enforcement Actions projects

The areas of SWEAP that will not be maintained or further invested by IMPEL through the Enforcement Actions projects include GPS tracking, and to a lesser extent training customs. Devices bought and paid for by SWEAP will still be deployed by the organisations as detailed in the report on B10. The results will be disseminated on Basecamp and an update provided at each best practice meeting.

National customs will not be targeted for IMPEL training. However, the Prevent portal will remain available to any officer who needs additional knowledge of waste shipment provisions. Awareness of the tool will be promoted through the WCO and ENFORCE members.

IMPEL members will also be encouraged to include national customs in their waste shipment inspection planning and training activities. Best practice approaches in this area will be highlighted at best practice meetings. Customs will be asked to take part on officer exchanges where appropriate. It is IMPEL's intention to remain a key partner of WCO in its Operation Demeter activities. IMPEL members will also continue to provide training when requested by CEPOL.

3.4 After-Life Schedule

No.	Description of activity	When	Who	Source of finance
1	SWEAP website	Ongoing – December 2029	IMPEL	IMPEL
2	Officer exchanges (at least three a year, involving 8 officers per exchange)	Ongoing	IMPEL members	IMPEL
3	Annual best practice meetings	2025-29	IMPEL members	IMPEL
4	New hosting and app development contract	October 2024	IMPEL & IMPEL members	IMPEL
5	Service Level Agreement for App and CMS	November 2024	IMPEL & contractor	N/A
6	Data Protection Agreements	May 2025	IMPEL & IMPEL members	IMPEL
7	Regional inspections and participating in international enforcement campaigns	Three times a year	IMPEL members	IMPEL members
8	Updated visualisation tool	May 2025	IMPEL members	IMPEL members
9	Inspection results report each quarter with intelligence disseminated to Europol as requested	Ongoing	SEPA	SEPA
10	Updated “Guide to Repatriating Waste”	May 2026	Enforcement Actions Project Team	IMPEL members
11	Updating training material (via Prevent and Reference App)	Ongoing	Enforcement Actions Project Team	IMPEL members
12	Guidance on the shipment of end-of-life vehicles (including trucks) and spare parts	August 2026	Enforcement Actions Project Team	IMPEL members
13	Guidance on the shipment of batteries and solar panels for reuse	August 2027	Enforcement Actions Project Team	IMPEL members
14	Verification spreadsheet of sites outside Europe and migrate this to IMPEL Sharepoint	Ongoing	Enforcement Actions Project Team	IMPEL members
15	Intelligence reports	Ongoing	Environment Agency	Environment Agency
16	Annual reports and presentations to IMPEL General Assembly	Ongoing	Enforcement Actions Project Team	IMPEL members
17	Dissemination of SWEAP and Enforcement Actions activities	Ongoing	Enforcement Actions Project Team	IMPEL

3.5 Evaluation of planned activities

Evaluation of the implementation of the After-Life Plan (delivered through the Enforcement Actions Projects) will be through the IMPEL Governance procedure, whereby the Expert Team on Waste & TFS reviews project progress, in addition to quarterly reporting. IMPEL's General Assembly approves or rejects annual reports and deliverables. There has already been a call for manifestation of interest for each project the Enforcement Actions project for the 2025-27 period. This has indicated a strong level of support amongst IMPEL members. A similar exercise will be undertaken for the 2028-2010 period. The Project Change Log is managed by the IMPEL Secretariat, whereby adjustments to deliverables and budgets are recorded.

The draft Terms of Reference (ToR) for the 2025-27 are annexed to this report. A similar has been adopted for quarter 4 2024. These outline the deliverables and working methods to be used. The main risks to not completing the work are also set out; these mainly related to possible waning enthusiasm by IMPEL members and budget constraints. The former is not anticipated to be a serious concerns given the level of engagement with the 'manifestation of interest' exercise. The formal adoption of the ToR will be in November 2024.

Appendix 1 – Terms of Reference

Name of Project: Enforcement Actions on waste shipments	
ToR Reference No.: <i>Click or tap here to enter text.</i>	Author(s): Katie Olley
Version: <input checked="" type="checkbox"/> Draft <input type="checkbox"/> Final <input type="checkbox"/> Adopted	Date: 31-Aug-24
TERMS OF REFERENCE FOR WORK UNDER THE AUSPICES OF IMPEL	

Please read the [IMPEL Internal Rules](#), [IMPEL Tender Policy](#) and [IMPEL Travel Policy](#) before filling in the Terms of Reference Template.

1. Work type and title

1.1 Identify which Expert Team this needs to go to for initial consideration	
Industry and air	<input type="checkbox"/>
Waste and TFS	<input checked="" type="checkbox"/>
Water and land	<input type="checkbox"/>
Nature protection	<input type="checkbox"/>
Cross-cutting tools and approaches	<input type="checkbox"/>
1.2 Type of work you need funding for	
Exchange visits	<input checked="" type="checkbox"/>
Peer reviews (e.g. IRI)	<input type="checkbox"/>
Conference	<input checked="" type="checkbox"/>
Development of tools/guidance	<input checked="" type="checkbox"/>
Comparison studies	<input type="checkbox"/>
Assessing legislation (checklist)	<input type="checkbox"/>
Other, (please describe):	

Conference (refers to Best Practice meetings. Other costs relating to hosting and app development

1.3 Full name of work

Enforcement Actions Project on waste shipments, to enable:

1. that there is a base-level skill set amongst inspectors and law enforcement agencies in this complicated area of enforcement, and that officers have access to online training tools and in-field guidance.
2. intensifying collaboration nationally and internationally between IMPEL members and external partners to prevent illegal movements of waste and ensure swift action when they do occur.
3. Developing and maintaining innovative tools and techniques for recording inspections and sharing data
4. Creating European-wide inspection dataset
5. Providing intelligence products where possible

1.4 Abbreviated name of work or project

Enforcement Actions

2. Outline business case (why this piece of work?)

2.1 Name the legislative driver(s) where they exist

- Waste Shipment Regulation 1013/06/EC (WSR)
- Regulation EU 1418/2007 as amended by (EU) 2021/1840 on the export of green-listed waste to non-OECD countries
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- OECD Decision of the Council on the Control of Transboundary Movements of Wastes Destined for Recovery Operations

2.2 Link to IMPEL MASP priority work areas

- | | |
|---|-------------------------------------|
| 1. Assist members to implement new legislation. | <input checked="" type="checkbox"/> |
| 2. Build capacity in member organisations through the IMPEL Review Initiatives. | <input type="checkbox"/> |
| 3. Work on ‘problem areas’ of implementation identified by IMPEL and the European Commission. | <input checked="" type="checkbox"/> |
| 4. Other, (please specify):
Click or tap here to enter text. | <input type="checkbox"/> |

2.3 Why is this work needed?

Waste shipments remains a problem area for enforcement given the varying level of resources and training amongst competent authorities. Dealing with illegal shipments and repatriations cost IMPEL members in staff time and limit public funds. Although the waste streams involved, and destinations, fluctuate from year to year, constant vigilance is needed in this area; hence why it has remained a priority for IMPEL and the EU with its recent review of the WSR and bolstering of enforcement provisions. Recent attention has been on the illegal shipment of plastic and waste electrical and electronic equipment, leading to changes in the Basel Convention. Media focus remains high in this area.

This project aims to assist IMPEL members in dealing with these issues from providing training and guidance, exchanging best practice to providing practical in field tools for authorities. At the last SWEAP best practice meeting feedback from the breakout sessions was that participants had a strong desire for the ‘Enforcement Actions’ work to continue and that it was vital for their enforcement roles. Specific inspection campaign periods were also discussed that could last a week or more, as determined by IMPEL members. Some could coincide with actions from e.g., EMPACT/ WCO initiatives. The majority were in favour of these for more intensive action, either on a specific waste streams, or common waste streams.

IMPEL also has obligations under the Life SWEAP to fulfil maintain certain tools five years after the end of the project. These are referred to as ‘after-life’ agreements. The App developed under technical actions B3 & B8 will need to be kept up to date, as will the Prevent portal and site verification spreadsheet. The web presence of SWEAP webpage will also have to be maintained as required by the SWEAP Grant Agreement, where additional guidance are accessed. The plan is to move the web presence to the main IMPEL website but funding will be needed for this ‘compaction’ redesign.

2.4 Desired outcome of the work

Ensure that relevant officers in IMPEL member organisations have access to good quality, and up to date training materials; that Inspectors and their counterparts in Customs and Police administrations are appropriately trained; best practice can be exchanged; officers reporting systems are upgraded and supported and verification of sites outside Europe is made easier. This will enable IMPEL members to demonstrate to the Commission that they are meeting the requirements of their Waste Shipment Inspection Plans.

Provide officers with guidance on waste streams of emerging concern such as batteries, solar panels, ELVs & trucks and spare parts. Update training materials and procedures of repatriation, in accordance with the revised WSR.

2.5 Does this project link to any previous or current IMPEL projects?

Yes, Shipments of Waste Enforcement Action Project, and previous Enforcement Actions projects (prior to 2018).

3. Structure of the proposed activity

3.1 Describe the activities of the proposal

1. Multi-country officer exchanges. To make sure these are targeted and therefore more efficient – e.g. countries that has a joint border and/or mutual regular waste shipments and especially illegal shipments should take part in this. These may be linked to specific joint regional and international inspection campaigns (dates and frequency to be determined and announced as far in advance as possible). Participants in SWEAP have also expressed the view that exchange groups from across Europe should not be limited to specific regions to ensure broader learning. A simple guide to hosting an exchange is to be developed to encourage a wider range of countries to be involved (January 2025)
2. Hosting for SWEAP app and development/ security patches as required (throughout project)
3. Develop Data Protection Agreements (covering data controllers) between IMPEL and each authority using reporting App (May 2025)
4. Develop Service Level Agreement (framework) between IMPEL and hosting provider and App developer (to be completed 2024)
5. Collation of data and production of an overview on legal and illegal shipments via visualisation tool and quarterly written reports (intelligence to be provided once Data Processing Agreements finalised)
6. Assisting authorities with dissemination of violations to Europol (upon request)
7. Updating the 2017 “Guide to Repatriating Waste” once the revised Waste Shipment Regulation is officially published (May 2026)
8. Updating training material (via Prevent) as needed with the revision of the WSR
9. Produce guidance on the shipment of end-of-life vehicles (including trucks) and spare parts (August 2026)
10. Guidance on the shipment of batteries and solar panels for reuse – August 2027 (or earlier if possible)
11. Annual best practice meetings, with additional exchange of best practice as required via webinar. The former would focus on specific issues e.g., facility inspections, end-of-waste fraud, wind turbines, WSR recast and enforcement problems, emerging waste streams.
12. Provide a verification spreadsheet of sites outside Europe and migrate this to IMPEL Sharepoint (throughout project)

3.2 Describe the products of the proposal				
<ol style="list-style-type: none"> 1. Simple guide on how to host an exchange 2. Report on officer exchanges and best practice exchanged for dissemination with other participants. 3. Regional inspections and participating in international enforcement campaigns with outcome reports as appropriate 4. Updated visualisation tool for officers to use to plan their inspections 5. Hosting and provision of reporting and guidance app alongside Data Protection Agreements and a Service Level Agreement 6. Inspection results report each quarter with intelligence disseminated to Europol as requested 7. Updated “Guide to Repatriating Waste” 8. Updating training material (via Prevent) 9. Guidance on the shipment of end-of-life vehicles (including trucks) and spare parts 10. Guidance on the shipment of batteries and solar panels for reuse 11. Annual best practice meetings, with additional exchange of best practice as required via webinar 12. Verification spreadsheet of sites outside Europe and migrate this to IMPEL Sharepoint 13. Annual reports 14. Final report 				
3.3 Risks				
Description of the Risk	Milestone	Mitigation Method	Probability	Impact
<i>What are the potential risks for this project and what actions will be put in place to mitigate these? Is this risk linked to a milestone?</i>			<i>Give a score from 1 to 5. 1: Low probability/impact 5: High probability/impact</i>	
Project Management time is not available	All	Ensure that this is agreed upfront before the start of the project	2	3
Some IMPEL partners unwilling to participate	Inspections and exchanges	Continual ‘one to one’ meetings and offers of assistance.	2	3
<i>Click or tap here to enter text.</i>	<i>Click or tap here to enter text.</i>	<i>Click or tap here to enter text.</i>	Choose an item.	Choose an item.

4. Organisation of the work

4.1 Lead
Katie Olley, SEPA, United Kingdom (Scotland)
4.2 Project team
<i>Please note that according to IMPEL Rules ‘Every project needs active participants from a minimum of nine IMPEL members confirming their support and physical or virtual active participation at least in its general project activities, before the project may start.’</i>
<p>Brian Heffernan, Dublin City Council National TFS Office (DCC), Ireland</p> <p>Alfred Sharples, Environment and Resources Authority (ERA), Malta</p> <p>Steven Leckey, Northern Ireland Environment Agency (NIEA), Northern Ireland</p> <p>Bojan Pockar and Vladimir Kaiser, IRSOP, Slovenia</p> <p>Ben Ryder, Environment Agency (EA), England</p> <p>Jens Andersen Hörman, Swedish Environmental Protection Agency, represented by Swedish Regional Board, Sweden</p> <p>Monica Crisan & Flavia Cristina Zdranc, National Environmental Guard, Romania</p> <p>Elvana Ramaj, Ministry of Tourism and Environment, Albania</p> <p>Walter Pirstinger and Christian Gesek, Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology, Austria</p> <p>Sylvie Hilgers Public Service of Wallonia + Catherine Van Nieuwenhoven, Belgium/Brussels Environment</p> <p>Tom Nuyts, Department of Environment & Spatial, Flanders, Belgium</p> <p>Demetris Demetriou, Cyprus/Ministry of Agriculture, Rural Development and the Environment</p> <p>Alice Pokorná, Czech Republic/Czech Environmental Inspectorate (CEI), Czechia</p> <p>Plausin Gergely, Ministry of Energy, Hungary</p> <p>Safete Kuci, Ministry of Economy and Environment, Kosovo</p> <p>Mārtiņš Egle, Latvia/Ministry of Environmental Protection and Regional Development of the Republic of Latvia - State Environmental Service, Latvia</p> <p>Darko Blinkov, State Environmental Inspectorate, North Macedonia</p> <p>Krzysztof Cieszkowski, Chief Inspectorate for Environmental Protection, Poland</p>

Lucia Bartošová, The Slovak Inspectorate of the Environment, Slovak Republic

Robert Rocek, State Inspectorate of Republic of Croatia, Croatia

Rene Rajasalu, Environmental Board, Estonia

Pirke Suoheimo, Ministry of the Environment, Finland

Gregor Hilfert & Ulrich Jeltsch, on behalf of Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, Germany

Sébastien CASSORÉ & Eric Stephan (DRCI OCLAESP) Gendarme, France, tbc on behalf of Ministry for the Ecological Transition, France

Danielle Frères, The Luxembourg Government – Environment Agency, Luxembourg

Arno Vink, Ministry of Infrastructure and Water Management, The Netherlands

Arnstein Flatlandsmo, The Norwegian Environment Agency, Norway

Susana Araújo, General Inspectorate for the Agriculture, Sea, Environment and Spatial Planning (IGAMAOT), Portugal]

Martin Luther, Federal Office for the Environment (FOEN), Switzerland

4.3 Other IMPEL participants

TBC

4.4 Other non-IMPEL participants

Likely to be Europol, World Customs Organization (WCO), Basel Convention Secretariat, non-European authorities (for verifications)

5. High level budget projection of the proposal (Please see Annex I for details)

	2025	2026	2027
Total costs for IMPEL	€€	€€	€€
Total co-financed	0.00 €	0.00 €	0.00 €
Total budget	#VALUE!	#VALUE!	#VALUE!

6. Detailed costs of the work

Please read the IMPEL Tender Policy before filling in Chapter 6.	
6.1 Are you using a consultant?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
6.2 What are the total costs for the consultant?	<i>Click or tap here to enter text.</i>
6.3 Who is paying for the consultant?	<i>Click or tap here to enter text.</i>
6.4 What will the consultant do?	<i>Click or tap here to enter text.</i> <i>It needs to be specified what kind of work the consultant will do and the criteria / specifics of such work.</i>
6.5 Are there any additional costs?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If your answer is 'Yes', please describe: Staff time for IMPEL members Hosting and app development costs. €/year
6.6 What are the additional costs for?	No, but Project Team time needed for organisation of the work, provision of training, working with developer, developing guidance, etc.
6.7 Who is paying for the additional costs?	IMPEL (for hosting and development)
6.8 Do you need budget for communications around the project?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If your answer is 'Yes', please describe: Possible provision of infographics via Canva. Approx costs 100 €
6.9 Describe the type of communication activities and the related costs.	Provision of infographics using Canva Provision of news items for IMPEL newsletter

6.10 What are the costs for communication?	€ 1/year
6.11 Are you seeking other funding sources?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If your answer is 'Yes', please describe: <i>Click or tap here to enter text.</i>

7. Communication and follow-up (checklist)

	What		By when
7.1 Indicate which communication materials will be developed throughout the project and when? <i>(all to be sent to the Communications Officer at the IMPEL Secretariat)</i>	TOR ^{✓*}	<input checked="" type="checkbox"/>	February 2024
	Interim report [✓]	<input checked="" type="checkbox"/>	September 2026
	Progress report(s) ^{✓*}	<input checked="" type="checkbox"/>	Annually (November)
	Project report ^{✓*}	<input checked="" type="checkbox"/>	December 2027
	Press releases	<input checked="" type="checkbox"/>	
	News items for the website ^{✓*}	<input checked="" type="checkbox"/>	As newsworthy items are available/ upon request
	News items for the e-newsletter	<input checked="" type="checkbox"/>	
	Project abstract ^{✓*}	<input checked="" type="checkbox"/>	February 2025
	IMPEL at a Glance [✓]	<input checked="" type="checkbox"/>	February 2025
	Other, (give details): <i>Click or tap here to enter text.</i>	<input type="checkbox"/>	
7.2 Milestones / Scheduled meetings (for the website diary).	<ol style="list-style-type: none"> 1. Guide on hosting an exchange and exchanges training dates (tbc) 2. Report on officer exchanges and best practice exchanged for dissemination with other participants (at least four weeks post exchange) 		

	<ol style="list-style-type: none"> 3. Annual best practice meeting (to be timed to synch with NCP meetings as appropriate) and report finalised (at least four weeks afterwards) 4. Regional inspections and participating in international enforcement campaigns with outcome reports as appropriate (frequency to be determined but perhaps three times a year) 5. Updated visualisation tool for officers to use to plan their inspections (in accordance with reporting requirements in revised WSR) – May 2025 13. Hosting and provision of reporting and guidance app alongside Data Protection Agreements and a Service Level Agreement – May 2025 14. Inspection results report each quarter with intelligence disseminated to Europol as requested 15. Updated “Guide to Repatriating Waste” – May 2026 16. Updating training material (via Prevent and Reference App) – ongoing throughout project as needed via revised WSR 17. Guidance on the shipment of end-of-life vehicles (including trucks) and spare parts – August 2026 18. Guidance on the shipment of batteries and solar panels for reuse – August 2027 (or earlier if possible) 19. Annual best practice meetings, with additional exchange of best practice as required via webinar 20. Verification spreadsheet of sites outside Europe and migrate this to IMPEL Sharepoint (ongoing throughout project and in accordance with new WSR needs) 21. Annual reports 22. Final report – December 2027
<p>7.3 Images for the IMPEL image bank.</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>
<p>7.4 Indicate which material s will be translated and into which languages.</p>	<p>App is currently available in 10 languages. Additional languages will be added as countries required. This will be done using DeepL and then proofed by native speakers.</p>

7.5 Indicate if web-based tools will be developed and if hosting by IMPEL is required.	Yes – Prevent portal, SWEAP legacy web-page. App and content management system to be hosted with costs covered by IMPEL
7.6 Identify which groups/institutions will be targeted and how.	IMPEL members, EU Commission, Basel Secretariat ENFORCE members, WCO. Interaction with IMPEL members will largely be via Basecamp. Direct contact (via Expert Team) with the Commission with data/report outputs. Also to WCO and ENFORCE updates
7.7 Identify parallel developments / events by other organisations, where the project can be promoted.	Through other international engagement work by the Expert Team, e.g. Asian Network. Taking part in WCO's Operation Demeter.

✓) Templates are available and should be used. *) Obligatory

8. Remarks

Is there anything else you would like to add to the Terms of Reference that has not been covered above?

Click or tap here to enter text.

In case of doubts or questions please contact the [IMPEL Secretariat](#).

Draft and final versions need to be sent to the [IMPEL Secretariat](#) in Word format, not in PDF.

Thank you.

