



## **IMPEL-TFS ENFORCEMENT ACTIONS II**

### **Enforcement of EU Waste Shipment Regulation**

### **“Learning by doing”**

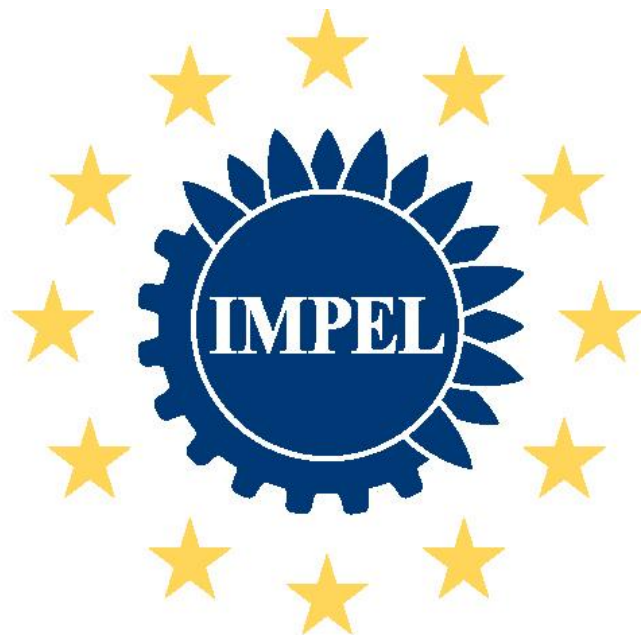
22 March 2011

Project Report III - Inspection results

Inspection Periods 5/6/7 – March, June and October 2010



European Union Network for  
the Implementation and Enforcement  
of Environmental Law



## European Union Network for the Implementation and Enforcement of Environmental Law

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

The network is commonly known as the IMPEL Network

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

Information on the IMPEL Network is also available through its new web site at: <http://impel.eu/>

For Transfrontier Shipment of Waste (Cluster 2) see: <http://impel.eu/cluster-2>

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# 1 Project description

Legislation in the field of waste policy came into force about 30 years ago in the context of increasing awareness of negative environmental and health impacts of waste management. Corresponding legislation contains related obligations for Member States to take appropriate measures for implementation and enforcement. Significant improvements have been achieved in a large range of sectors; however, statistics, studies and projects also show that envisaged targets have not always been sufficiently achieved, and that coordinated enforcement is needed.

As regards shipment of waste especially the IMPEL network with its Transfrontier Shipments' Cluster (IMPEL-TFS) coordinated a wide range of initiatives where Member State authorities gained substantial experiences as regards inspection methods, enforcement structures, planning of inspections and exchange of staff and information. This has been performed via the Seaport and Verification projects (2003 – 2006), Enforcement Actions I (2006 – 2008) and Enforcement Actions II (2008 – 2011).

The Enforcement Actions II project phase has according to the original planning been subdivided into seven inspection periods. Results of Inspection Periods 1, 2 and 3 between October 2008 and May 2009 have been summarised in an interim report "IMPEL-TFS Enforcement Actions II: Enforcement of EU Waste Shipment Regulation - Learning by doing". Results of Inspection Period 4 (September to November 2009) have been summarised in a second Interim Project Report II, available at the Interim Conference that took place on 10 – 12 February 2010 in Munich. The report on hand therefore centres on the results of the three inspection Periods 5 – 7 in March 2010, June 2010 and October 2010.

Another final inspection period 8 has been carried out in February 2011. This report does not include the results of this period due to the deadline of the report.





## 1.1 Project approach and time schedule

As in the first four inspection periods, the main steps of this project have been the preparation, implementation and reporting/communication. These fields of functions comprise the operational steps performed and implemented during the time of the project:

- **Preparation:** Organisation of a 2-day interim conference with an intermediate result of project outcomes, plans and results of inspections and expert exchanges, planning how to go on for the last three inspection periods 5, 6 and 7, and ways for further improvement
- **Operation:** Detailed planning, preparing and executing of transport, company, combined and other inspections, verifications and exchanges of inspectors
- **Reporting and communication:** Collection of all data, report and communication of the inspection and exchanges results.
- **Evaluation:** Assessment of inspection results, success of measures and the Enforcement Actions project series, conclusions, obstacles, lessons learnt and approaches for further improvements.

The project phase covered by this report comprises the period February 2010 through December 2010. The planning of the main work packages and working steps is shown in Table 1-1.

Table 1-1: Time schedule of project phasing and activities

Month Task Year	Feb 2010	Mar 2010	Apr 2010	May 2010	June 2010	July 2010	Aug 2010	Sep 2010	Oct 2010	Nov 2010	Dec 2010
<b>Preparation</b>											
Organisation of conferences	©										
<b>Implementation</b>											
Fifth, sixth and seventh inspection periods	*)	5	*)	*)	6	*)		*)	7	*)	
<b>Reporting/ Communication</b>											
Project execution: Collecting data, communication, newsletters, reports	  										

Legend:  Newsletters  Reports  Interim conference

\*) Inspection periods have officially been scheduled for March, June and October 2010, as agreed upon at the Interim Conference in Munich. However, some inspections that have taken place either the month before or the month after March, June and October 2010 have been attributed to the respective inspection periods as well; see for details the tables in Annex II, parts A, B and C.

### 1.1.1 Project work preparation – The Interim Conference

After the completion of the first four inspection periods, the Interim Conference of IMPEL-TFS Enforcement Action Project has been organised by the project team of BiPRO GmbH in close cooperation with the Enforcement Action II project leader, Mr Carl Huijbregts from the Dutch Inspectorate of the Ministry of Housing, Spatial Planning and the Environment (VROM), and with support of Mr Wolfgang Scholz from the Bavarian State Ministry of the Environment and Public Health, and held at the premises of the Ministry in Munich, Germany, from 10 to 12 February 2010.

The conference was attended by country coordinators for Enforcement Actions II and other representatives of national institutions involved in inspections and/or verifications of waste shipments. Participating countries were Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Germany, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Republic of Macedonia, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovenia, Slovakia, Sweden, Turkey, the United Kingdom (Northern Ireland and Scotland). Besides that, a member of RILO (Regional Intelligence Liaison Office) of the World Customs Organisation, and a member of the INECE Seaport Environmental Security Network took part. France, Spain and Serbia announced their participation in the project but had to cancel at short notice.

The specific objectives of the interim conference in Munich included:

1. Discuss on:
  - Outcome of Inspection Periods 1-4 of the Enforcement Action II project already completed
  - Exchange of best practices on operational level, such as the organization of port and road inspections, risk-based selection of inspection objects, practical issues of inspection, and the collaboration with police and customs
  - Need for enforcement tools and possibility to develop new enforcement tools, such as Waste Watch and guidance documents
2. Make agreements on Joint inspections and exchange programs (plan) for the forthcoming three inspection periods (5, 6 and 7) in March, June and October 2010
  - Joint inspections
  - Exchange of information, knowledge and inspectors

The focus of the exchange program and activities can be characterized as follows:

- Exchange of experienced countries with less experienced countries
- Involvement of other authorities, such as the customs and police
- Exchange of best practices shall be focused on a specific region and shall especially stimulate regional collaboration between waste authorities, police, customs, local and municipal authorities and others
- A combination of joint inspections with the exchange program is possible.

In the optimal case, per period 3 inspection days are envisaged per country. These can comprise port inspections, road inspection and company inspection. Inspections can be arranged in combination with other international or national projects/routine national inspection work.

For the exchange program, an IMPEL budget has been available for travelling and accommodation of about 10 to 15 exchanges with 2 to 3 persons involved.

The conference included plenary and working group sessions, presentations and discussions. The results from the meeting correspond to its objectives. The objectives set were achieved through the collaboration of all participants, organizers, and sponsor.

Following the feedback from the participants, similar to the start conference in Utrecht in October 2008, the Munich conference was successful, achieved its aim and developed ideas for further cooperation and participation in international projects with customs, police and INECE (Seaports). Participants stressed that all Member States should participate in order to establish good cooperation and that more high level management support and guidance would be needed in several countries to establish a level playing field of enforcement. For the minutes and major outcomes from the conference see in more detail the conference report of 19 March 2010.





Figure 1-1: Participants of the Interim Conference in Munich 10 – 12 February 2010

### **1.1.2 Project operation**

During the project, the goal has been to achieve supervision and control at all potential sites where waste is situated or passes through:

- Freight transport (road, waterway/harbours, railway)
- Companies where physical activities with waste take place (waste generation, storage, e.g. at container terminals, segregation, conditioning, recycling, destruction, disposal)
- Administrative checks of documents at customs and other governmental authorities and waste brokers and trading companies
- Combination of inspections mentioned above

The approach has been established, proved and tested in previous projects, especially IMPEL-TFS Enforcement Action I and the first four inspection periods of IMPEL-TFS Enforcement Actions II. This comprises the selection of transport vehicles or vessels for inspection and a pre-selection of waste shipments based on customs documents especially during seaport inspections.



Violations of the requirements of the Regulation are identified:

- if a shipment does not have the necessary documents
- if the material transported does not correspond to the information in the documents
- in case of illegal treatment or a ban.

The common standard organisation and operation procedure was followed throughout IMPEL-TFS Enforcement Actions II: A country coordinator was responsible in each participating state for the implementation and coordination of the project and the agreements on joint inspections and inspector exchanges. The country coordinators collected the inspection results and transmitted this information to the project management.

### **1.1.3 Project reporting and communication**

**Reporting:** After completion of inspections, country coordinators receive and collect all single inspection result forms of the respective country. Based on the outcome of the working group on collaboration and inspection planning and reporting at the Interim Conference, reporting forms have been updated and improved for both transport and company inspections. Out of the single transport inspection data, the country coordinator fills in a total result transport inspection form and (new in 2010) a total result company inspection form for each inspection period and sends it to the project management and project consultants. The project consultants gather and analyse all total result forms and also reports of the inspector exchanges over that period.

**Internal and external communication:** At the Interim Conference in Munich, based on practical experience one of the working groups has elaborated means and practical ways of optimized collaboration of authorities on the national and international level, including initiatives of customs (Operation DEMETER), police (AUGIAS) and the INECE Seaport Environmental Security Network. Three further project specific newsletters ("up 2 date" Nr 9, 10 and 11) have been drafted during the reporting period, with contributions reporting about practical experiences and exchange activities.

During October 2010 the international AUGIAS project was executed.<sup>1</sup> Several police organizations in Europe carried out waste shipment inspections, mainly on the road. The IMPEL-TFS partners were informed before, in particular via newsletter, that they might be contacted by the police organization of their country for assistance or collaboration. From IMPEL-TFS information about the EAIL project and contact information of the participating countries was brought in an AUGIAS training module. Therefore, a large share of reported inspections of Inspection Period 7 has been joint AUGIAS inspections.

Such components of communication strengthen the successful organisation of joint European enforcement of transfrontier waste shipment and raise awareness on the risks of illegal waste shipments. Other accompanying public information measures in this field have been e.g. the organisation of awareness-raising events on the application of Community legislation, in 2010 and 2011 focussed in particular on the new Waste Framework Directive 2008/98/EC.

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<sup>1</sup> The AUGIAS project, jointly initiated by the Belgian and Hungarian police, has been aimed at establishing and

## 1.2 Inspection planning

Annex I presents the details on the planning of inspection for each of the participating countries, according to the announcements at the Interim Conference. In addition, several countries announced their inspection via planning forms prior to the actions.

Transmission of planning documents was often congruent with the indications given during the Interim Conference. In a number of cases results were reported without having sent planning forms in advance. In a few cases, especially for Denmark, planning forms of inspections have already been sent before the Interim Conference with dates for inspection already fixed.

It was agreed upon at the Interim Conference to limit oneself to reporting the activities of three days per inspection period and country, although some countries did perform more extensive activities. Therefore, sometimes country coordinators decided – after having received the outcome of the inspections – to report those results that showed the most useful or spectacular results with regard to transfrontier waste shipments. So it was considered acceptable that in particular cases planned inspections have been replaced by others showing more interesting findings. This was e.g. the case in the Netherlands: A planned port inspection in June did not show any findings with regard to the transfrontier waste shipments, but an additional one in the same month at the ferry terminal in Vlissingen, induced by a coordinated action between the UK Environment Protection Agency and the Dutch VROM Inspectorate, discovered four loads of waste paper and one of broken pallets from the United Kingdom with an incomplete Annex VII.

Even countries that could not attend the conference (partly due to adverse weather conditions), namely Serbia, Spain (regional activities in Galicia) and France, were active in the joint inspection periods in 2010.

## 2 Project results

In this chapter all results of the inspections, verifications, collaboration and exchange of inspectors are described and analysed.

During the final phase of the project running time of IMPEL-TFS Enforcement Actions II the last three inspection periods were planned and performed:

- 5<sup>th</sup> inspection period: March 2010. Some inspection measures have been included that had taken place in February 2010 (Cyprus, The Netherlands, Sweden) and April 2010 (Bulgaria, Cyprus, Serbia, Slovenia, Turkey).
- 6<sup>th</sup> inspection period: June 2010. Some inspection measures have been included that had taken place in May 2010 (Bulgaria, Czech Republic, Denmark, Norway, Serbia, Sweden) and July 2010 (Cyprus, Czech Republic).
- 7<sup>th</sup> inspection period: October 2010. Some inspection measures have been included that had taken place in September 2010 (Czech Republic, Germany, Slovakia, Switzerland) and at the beginning of November 2010 (Finland).

A summarizing overview on the activities of participating countries is provided in the following chapter. There have been no cases where countries that have explicitly announced plans for inspections during the Interim Conference had to shift or cancel some of their activities due to lack of infrastructure, time or money. Moreover, several countries reported results of inspections without previous announcement by a planning form. First results were provided from Cyprus, France and Bulgaria.

However, there are still some countries that did not report any activities for 2010. These are Italy, Iceland, Luxembourg and Malta. Lithuania did not report results apart from the participation in the Baltic Exchange event. The Republic of Macedonia and Greece did not send any report, but participation in joint inspection became known through the reporting of other participants (e.g. a joint activity from Serbia at the Serbian-Macedonian border; controls at the Bulgarian-Greek road border and a company inspection in Cyprus).

### 2.1 Participating countries in Inspection Periods 5, 6 and 7

As illustrated in Table 2-1, 25 EU Member States and 7 further European countries participated in the Enforcement Actions II project, most of them actively by executing transport and/or company inspections and sending their results. A few of these countries not hitherto active could be activated on the regional or federal level by common activities and exchanges with neighbour countries (Spain – province of Galicia, France – port authorities in Le Havre, where also a port inspection was performed in October 2010) or twinning activities (Bulgaria by the assistance of twinning advisors of the Umweltbundesamt of Austria). There is hope that best practice of local or regional groups will serve as pilot schemes in order to foster and assist activities in other parts of the country at a later stage.

Table 2-1: Participating countries

1. Austria (AT)	12. Hungary (HU)	23. Portugal (PT)
2. Belgium (BE)	13. Iceland (IS)	24. Romania (RO)
3. Bulgaria (BG)	14. Ireland (IE)	25. Serbia (RS)
4. Croatia (HR)	15. Italy (IT)	26. Slovakia (SK)
5. Cyprus (CY)	16. Latvia (LV)	27. Slovenia (SI)
6. Czech Republic (CZ)	17. Lithuania (LT)	28. Spain (ES)
7. Denmark (DK)	18. Macedonia (MK)	29. Sweden (SE)
8. Estonia (EE)	19. Malta (MT)	30. Switzerland (CH)
9. Finland (FI)	20. The Netherlands (NL)	31. Turkey (TR)
10. France (FR)	21. Norway (NO)	32. United Kingdom (UK) – Northern Ireland and Scotland
11. Germany (DE)	22. Poland (PL)	

Countries highlighted in red did not participate in the operational phase of the project after the Interim Conference.

Table 2-2 shows an overview on the participation of countries during Inspection Periods 5, 6 and 7 on the typical sites where inspections took place:

Table 2-2: Overview on inspection activities throughout the three inspection periods

	Harbour/seaport/ ferry terminal	Road (national borders and other sites)	Railway	companies
5. period (February/March/April 2010)				
Results as reported	BE, CY, DK, FI, FR, IE, NL, UK-NI, PL, PT	AT, BE, BG, CZ, DE, DK, ES, HR, HU, IE, NL, PL, PT, RO, RS, SI, SK, TR	PL, SI	AT, CY, CZ, IE, UK-NI, RS, SI
6. period (May/June/July 2010)				
Results as reported	BE, BG, DK, FR, IE, NL, NO, PL, SI, UK-NI, UK-SC	AT, BE, BG, DE, ES, HR, HU, NL, NO, PL, PT, RS, SI, SK	PL	CY, CZ, IE, UK-NI, PT, RO, RS
7. period (September/October/November 2010)				
Results as reported	BE, CY, DE, EE, FR, IE, NL, UK-NI, PL, SE	AT, BE, CH, CY, CZ, DK, EE, HU, IE, NL, PL, PT, SE, SI, SK, UK-NI	CH, DE, EE	BE, CY, FI, IE, RO, SI

Inspections of airports and other places such as inland water transport and inland ports did not take place. However, control of harbours has been extended to incoming transport at ferry terminals, and – beside the main harbours at the North Sea and Baltic Sea – to some harbours at the Mediterranean Sea (Limassol, Cyprus, Koper, Slovenia and Marseille, France), at the English Channel (Le Havre, France) and at the Black Sea (Varna, Bulgaria).

There has been a consolidation of experience, e.g. during joint inspections at several road borders. As already explained, several of the inspections have not formally been announced via planning forms; therefore a strict and detailed comparison of planned and performed inspections has not been regarded as very meaningful. In a few cases some dates or locations have been changed after planning, or the results of an inspection that did unexpectedly not identify transfrontier waste shipments have been

replaced by those of another successful one during the inspection period. In the case that countries or their authorities performed inspections pertaining over more than three days (especially Belgium and Poland) it was decided afterwards to select the inspections of those three days with the most or most interesting results with regard to violations.

From Inspection Period IV on, the focus on company inspections has generally increased, but not in all countries. If further ad-hoc results have been contributed during the respective inspection periods that have not been systematically planned in the IMPEL-TFS context, and the results reported contained all information required in the context of analysis (or could be gathered by a further query), they were in general added to the results.

## 2.2 Inspections and violations

### 2.2.1 Overview of inspections

Table 2-3 gives an overview on the amounts and types of inspection activities during the three inspection periods 5, 6 and 7 during the year 2010. Each type of inspection has been enumerated as one action if announced by a separate planning form or having taken place at a specific site and date. Actions covering more than one calendar day were counted only once if notified as one cohesive event. It is emphasised that not all of these activities have been announced by planning forms, but all activities are included in the evaluation of the inspection figures if result forms have been provided as foreseen.

Table 2-3: Total number of inspection actions during the three periods

Type of inspections	March (February – April) 2010	June (May – July) 2010	October (September – November) 2010	Total
Transport inspections	36	41	47	124
- with national cooperation	35	39	42	116
- with international cooperation	18	19	19	56
Company inspections	9	15	8	32
- with national cooperation	3	3	3	9
- with international cooperation	1	5	1	7
<b>Total</b>	<b>45</b>	<b>56</b>	<b>55</b>	<b>156</b>

In addition to the planned IMPEL-TFS inspections Bulgaria, Cyprus, Denmark, Germany, Switzerland and Sweden reported results of further interim inspections that have been carried out during and in between the inspection periods. In previous reports, these activities have been generally subsumed under the term “ad-hoc inspections” which might be misleading, as it does not completely reflect the different character of these additional activities.

In the case of Switzerland the controls of outbound traffic have been undertaken systematically during regular and permanent customs activities at the borders. Customs officers have a systematic look at cases of potential transfrontier waste transports declared as goods and suspected of being illegal. So

these control results have not been originally planned and announced within the EA II project but additionally reported on a semi-annual basis. These figures are not covered in the evaluation tables in this chapter but have been compiled separately.

In the case of Bulgaria, Cyprus and Denmark additional activities have taken place already in January (Cyprus) or in August 2010 (Bulgaria, Denmark), so they have not been attributed to one of the inspection periods under consideration. In Sweden several ad-hoc inspections at harbours during the whole year of 2010 found illegal exports, mainly to African countries, in Germany there have been some additional motorway inspections of the county government of Hesse in cooperation with the Bundesamt für Güterverkehr (BAG). During the latter activity, both waste transport controls and transfrontier shipments amount to a subordinate share of total controls.

The results as summarised above lead to the following conclusions:

- From the participating 32 countries finally 26 countries conducted and reported concrete inspection activities throughout the year 2010. Road transport inspections are the most common type of inspections carried out within this project, followed by seaport inspections. In a few cases also trains were inspected. So, compared to Inspection Periods 1 to 3, four more countries became active.
- Company inspections play a subordinate but nevertheless valuable accompanying role fostering the results of transport inspections. In 11 countries at least one company inspection took place during 2010. Due to the adjusted reporting form on total company inspections it can be examined to which extent company inspections have taken place as follow-up activity (e.g. for verification) induced by suspicious cases discovered by transport inspections, on request of other authorities, or as routine inspections. This is analysed further in Chapter 2.2.4.

Inspections described do not cover all waste shipments that are executed in Europe. In part of the participating countries (many) other waste shipment inspections are carried out by waste shipment authorities, police and customs. Although a reminder to countries not yet having reported inspections brought forward some additional results gained during 2010, it is not known whether in the non-participating countries waste shipment inspections have been carried out or not.

Although waste shipment related inspections within the European Union as reported under Enforcement Actions II are still unevenly distributed and large gaps in control can be seen, e.g. because the activities of several countries important for European and transnational transport and shipment are missing or at least unknown to IMPEL-TFS Enforcement Actions II, some progress has been made to include and activate further authorities, e.g. in Cyprus, Spain, France, Bulgaria and Turkey.

## **2.2.2 General results of transport inspections**

The results of individual inspection cases within Inspection Periods 5, 6 and 7 are shown in periods are shown in Table 2-4.



Table 2-4: Results of single inspection cases during the three inspection periods

Type of inspections	March (February – April) 2010	June (May – July) 2010	October (September – November) 2010	Total
Total number of transports	4,410	3,858	4,305	<b>12,573</b>
Administrative checks	4,365	3,827	4,268	<b>12,460</b>
Physical inspections	2,763	3,596	4,067	<b>10,426</b>
Number of transfrontier shipments of waste	457	586	369	<b>1,412</b>
Percentage transfrontier shipments of waste of total physical inspections	16.5 %	16.3 %	9.1 %	<b>13.5 %</b>
Number of violations of the WSR	93	158	86	<b>337</b>
Percentage of transfrontier waste shipments in violation of the WSR	20.4 %	27.0 %	23.3 %	<b>23.9 %</b>

On the basis of the compiled results and the comparison to the corresponding figures of Enforcement Actions I and the first four inspection periods of Enforcement Actions II it is possible to draw the following conclusions:

- During the year 2010 (Inspection Phases 5 to 7) of IMPEL-TFS Enforcement Actions II a total number of 12,573 transports were inspected, this comprises the inspection of containers, trucks, trains and documents.
- Of these overall inspections reported, in 10,426 cases (82.9 %) also physical inspections of cars, trains, containers or storage locations have taken place.
- Out of these physical inspections, 1,412 transports, i.e. 13.5 %, concerned transfrontier shipments of waste. This share is significantly lower than in the inspection phases 1 to 3 (25 %) and has decreased again to around 9 % in the final phase of 2010. This is due to the finding that there have been many general road inspections, e.g. in cooperation with the AUGIAS project, where a very small share of traffic contained transfrontier shipments of waste.
- All in all, 337 of the inspected waste shipments, this means roughly 24 %, turned out to be in violation of the WSR requirements. This share of violations varied between 20 % in and around March 2010 (Inspection Period 5) and 27 % in and around June (Inspection Period 6) and shows a tendency of stabilisation over time.

The use of updated result forms, and also their recording, leads to a decrease in problems during reporting and interpretation compared to the inspection periods before. Nevertheless, in any cases where figures in the result form did not seem fully consistent or comprehensible, the contact persons were asked for clarification, so that data could be corrected or processed in a uniform way.

The reason for the decrease in the share of transfrontier shipments of waste over all physical inspections becomes clearer when the feature characteristic “Selection of inspected transports” (added in the new “Total results transport inspection form” as Section 3) is evaluated statistically. For this criterion, three options have been provided:

- Pre-selection based on intelligence: Only transports with high risk of violations have been inspected.
- On-site selection
- At random

During Enforcement Actions II participants were free to choose this mode of inspection period. Whether a pre-selection based on intelligence could be utilized depended on the information, the data and experience available, e.g. on the volume, mixture and time profiles of transport flows along transit routes. The possibility of an on-site selection depends on e.g. whether there is a national duty of labelling waste transports.

The waste “A” (Abfall) sign mandatory for waste transports in Germany and some other countries or the labels marking the transport of dangerous substances are in part used as selection parameter for transport inspections. Although these signs facilitate the selection, experience has shown that in most cases illegal waste shipments are, for reasons of camouflage, not carried out with vehicles showing an “A” sign.

Experience with typical indicators (e.g. country symbols, company signs, status of truck) and specific intelligence proved to be a relatively good tool for identifying transports with a high probability of detecting a violation.

Also innovative instruments for selection of vehicles are in development. For example license plate detection equipment of the police connected with digital waste registers has been used for selection of vehicles in the Netherlands.

It has been supposed in previous inspection periods that this mode of inspection has an influence on the ratio of finding a transfrontier waste shipment during a physical inspection. This ratio turned out 61.5 % for pre-selected inspections based on intelligence, 22.0 % for inspections with on-site selection but only 8.1 % for inspections at random.

Since random inspections – due to the integration of AUGIAS in autumn – contributed 68.8 % (over two third) to all physical inspections in 2010, they were the crucial factor for the numerical decline in the overall ratio of transfrontier waste shipments compared to 2009. The ratio of transfrontier waste shipments in violation of the WSR requirements did not vary considerably between the categories of pre-selected, on-site selected and random inspections. This ratio was highest for pre-selected inspections but nearly the same for random selections (both slightly over one fourth of all transfrontier waste shipments), and 22 % for on-site selected inspections as indicated in Table 2-5 .

Table 2-5: Results of single inspection cases during Inspection Periods 5, 6 and 7 broken down by selection approach

Type of inspections	Pre-selection based on intelligence	On-site selection	At random	Total
Total number of transports	1,832	2,967	7,774	<b>12,573</b>
Administrative checks	1,805	2,939	7,716	<b>12,460</b>
Physical inspections	304	2,947	7,175	<b>10,426</b>
Number of transfrontier shipments of waste	187	647	578	<b>1,412</b>
Percentage transfrontier shipments of waste of total physical inspections	61.5 %	22.0 %	8.1 %	<b>13.5 %</b>
Number of violations of the WSR	48	142	147	<b>337</b>
Percentage of transfrontier waste shipments in violation of the WSR	25.7 %	21.9 %	25.4 %	<b>23.9 %</b>

### 2.2.3 Specification of violations observed during transport inspections

Results from transport inspections, including the number of detected violations are compiled country by country, broken down for the three inspection periods 5 to 7. Not all of the countries did actively participate in all of the three inspection periods. For joint inspections at the border, usually both countries reported their inbound traffic, unless there has been a joint reporting of one team for all cases. So each inspection or violation case has been reported once and Table 2-6 does not contain any double counting.

Table 2-6: Reported numbers of inspected transports and violation rate from February to November 2010

Participant	Total	Admin	Physical	Waste Inspections	%	violations	%
Austria	<b>2,203</b>	<b>2,203</b>	<b>2,203</b>	<b>171</b>	<b>7.8</b>	<b>32</b>	<b>18.7</b>
Belgium	<b>198</b>	<b>162</b>	<b>198</b>	<b>112</b>	<b>56.6</b>	<b>36</b>	<b>32.1</b>
Bulgaria	<b>13<sup>1)</sup></b>	<b>13<sup>1)</sup></b>	<b>13<sup>1)</sup></b>	<b>13<sup>1)</sup></b>	<b>100.0</b>	<b>13<sup>1)</sup></b>	<b>100.0</b>
Croatia	<b>36</b>	<b>36</b>	<b>36</b>	<b>36</b>	<b>100.0</b>	<b>3</b>	<b>8.3</b>
Cyprus	<b>13</b>	<b>13</b>	<b>13</b>	<b>13</b>	<b>100.0</b>	<b>7</b>	<b>53.8</b>
Czech Republic	<b>903</b>	<b>903</b>	<b>903</b>	<b>6</b>	<b>0.7</b>	<b>5</b>	<b>83.3</b>
Denmark	<b>181</b>	<b>181</b>	<b>152</b>	<b>58</b>	<b>38.2</b>	<b>11</b>	<b>19.0</b>
Estonia	<b>152</b>	<b>152</b>	<b>152</b>	<b>5</b>	<b>3.3</b>	<b>3</b>	<b>60.0</b>
Finland	<b>158</b>	<b>151</b>	<b>158</b>	<b>10</b>	<b>6.3</b>	<b>0</b>	<b>0.0</b>
France	<b>26</b>	<b>26</b>	<b>24</b>	<b>26</b>	<b>100.0<sup>3)</sup></b>	<b>13</b>	<b>50.0</b>
Germany <sup>2)</sup>	<b>576</b>	<b>576</b>	<b>576</b>	<b>183</b>	<b>31.8</b>	<b>44</b>	<b>24.0</b>
Hungary	<b>326</b>	<b>326</b>	<b>122</b>	<b>7</b>	<b>5.7</b>	<b>5</b>	<b>71.4</b>
Ireland	<b>125</b>	<b>85</b>	<b>91</b>	<b>114</b>	<b>91.2<sup>3)</sup></b>	<b>29</b>	<b>25.4</b>
The Netherlands	<b>346</b>	<b>345</b>	<b>311</b>	<b>144</b>	<b>46.3</b>	<b>25</b>	<b>17.4</b>
Norway	<b>125</b>	<b>125</b>	<b>125</b>	<b>125</b>	<b>100.0</b>	<b>51</b>	<b>40.8</b>

Participant	Total	Admin	Physical	Waste Inspections	%	violations	%
Poland	1,500	1,500	1,500	56	3.7	26	46.4
Portugal	3,767	3,767	2,255	177	7.8	14	7.9
Romania	Joint inspection was reported by Hungary						
Serbia	18	18	18	13	72.2	0	0.0
Slovakia	595	595	595	6	1.0	2	33.3
Slovenia	318	289	128	34	26.6	4	11.8
Spain	Joint inspections were reported by Portugal						
Sweden	180	180	180	7	3.9	7	100.0
Switzerland	69	69	69	69	100.0	3	4.3
Turkey	6	6	6	6	100.0	0	0.0
UK / Northern Ireland	568	568	568	20	3.5	3	15.0
UK / Scotland	171	171	30	1	3.3	1	100.0
<b>Overall total</b>	<b>12,573</b>	<b>12,460</b>	<b>10,426</b>	<b>1,412</b>	<b>13.5</b>	<b>337</b>	<b>23.9</b>

<sup>1)</sup> Mission reports provided disclose only violation cases, not total figures of inspections.

<sup>2)</sup> In addition results of a joint inspection were reported by Switzerland.

<sup>3)</sup> share transfrontier waste shipment related controls of total inspections

For most cases participating countries reported the same figures for total checks, administrative checks and physical inspections, which means that in all reported cases administrative checks lead to physical examination and vice versa. In cases of differences the reasons were usually asked back. Differences can be reasonable in both directions, e.g. in the following cases:

- Number of physical checks is lower than number of administrative (and thus of total) checks: For harbour inspections customs forms are checked, risk profiles and sensitivity analysis are applied, and only some of the movements are chosen for opening containers.
- Number of physical checks is higher than number of administrative checks: When the physical inspection reveals that a truck does not contain waste, it is not necessary to inspect further documents. In cases of E-Waste at harbours subject to an export ban there are usually no accompanying documents to check.

If “administrative check” has been marked (e. g. CMR documents) without stating a specific number, it has been assumed that all reported physical transport controls have undergone previous checking in administrative terms.

A special regard shall be focussed on the rail transport inspections included in the figures of Table 2-7.

There have only been five railway inspections in total during the year 2010, undertaken by four countries:

Table 2-7: Reported numbers of rail transport inspections from February to November 2010

Participant	Total	Admin	Physical	Waste Inspections	%	violations	%
Estonia IP 7 / Total <sup>1)</sup>	1	1	1	1	100	0	0
Germany/ Switzerland <sup>2)</sup> IP 7 / Total	3	3	3	3	100	0	0
Poland: IP 5	8	8	8	0	0	0	n.a.
IP 6	46	46	46	0	0	0	n.a.
Total	54	54	54	0	0	0	n.a.
Slovenia IP 5 / Total	20	9	20	18	90.0	1	5.6
<b>Overall total</b>	<b>78</b>	<b>67</b>	<b>78</b>	<b>22</b>	<b>28.2</b>	<b>1</b>	<b>4.5</b>

<sup>1)</sup> AUGIAS inspection at Tartu railway station, non-compliance was not found

<sup>2)</sup> Joint inspection at the Swiss-German border, reported by Switzerland.  
n.a.: not applicable (ratio of 0/0)

In railway inspections the share of transfrontier waste inspections in relation to the total number of physical inspections (28 %) was higher than for other transport inspections. But results between the single actions varied dramatically. None of the 54 inspected containers turned out to be waste during controls in Poland, whereas almost all inspected containers transported waste during the controls in Slovenia (20) at the German/Swiss border (3) and at the control in Estonia (1). With only one discovered violation, being an incomplete Annex VII document accompanying paper waste, the violation rate was very low (4.5 %). Due to the low absolute frequency figures this ratio might not be significant.

It seems that railway freight transport might not be a very frequent means of transportation for illegal waste shipments – one potential reason could be that senders of waste expect railway companies to show a rather high responsibility for monitoring the compliance of transport and its documents. However, more rail inspection results should be available to verify this assumption.

Based on these data the conclusions can be drawn that:

- the ratio of waste transports identified during inspections (usually related to physical inspections) varies largely from less than 1% to 100% and can be even zero in some single actions. This range results partly from differences in reporting, but is also largely influenced by the level of intelligence-led selection. Impact parameters are also the type of inspection activities (higher ratio for container inspections in harbours!) and national labelling obligations (A-sign) facilitating the selection. When planning inspection events, it cannot be foreseen how many transport or container cargos of a sample gathered at a specific site contain waste. It is generally reasonable to combine TFS inspections with inspections for other purposes, such as general customs or road traffic regulations (ADR). If multi-purpose inspections are undertaken, the share of waste related inspections will be less than in case of specific controls related to transfrontier shipment of waste only (e.g. in a harbour).

- the percentage of violations, i.e. the ratio of detection, ranges from 0% to 100%, with an average of 24%. The wide range is primarily due to the small total number of transfrontier waste transports identified within specific countries. See that e.g. Czech Republic had a high rate of 83% (5 out of 6 waste transport inspections) whereas in Inspection Periods 1 to 3 this rate was 0% (no violation out of five waste transport inspections). Other factors like coincidence, the experience in selection procedure (first inspections often not associated with high ratios, focus on specific carriers potentially associated with higher rates), and level of activities in the past (tendency to lower rates in countries with frequent control activities in the past) seem to be of relevance.
- The overall violation rate has stabilised at an average level of 24% with a peak in Inspection Period 6 (27%).

Due to the restriction of three days per authority and inspection period, figures do not necessarily cover all TFS inspections performed in a given country. Inspections can be done at random, partly selective or very specific, and participants have in principle been free to choose the inspection method depending on the available information and data necessary for selective inspections. Therefore a comparison of total figures as well as violation percentages of all wastes transports in Europe can be only indicative.

#### *Allocation by country of dispatch and destination*

The following Table 2-8 shows the statistics of violations, broken down by countries of dispatch and destination of the waste shipments.

Table 2-8: Violations related to dispatch and destination countries (based on information in Section 5 of the total results transport inspection form):

Country	Dispatch	Destination
<b>EU countries</b>	<b>267</b>	<b>257</b>
Austria	21	27
Belgium	10	12
Bulgaria	2	9
Czech Republic	8	4
Cyprus	7	-
Denmark	10	1
Estonia	3	1
Finland	3	-
France	17	4
Germany	48	58
Greece	-	3
Hungary	9	4
Ireland	32 *)	6 *)
Italy	4	4
Luxemburg	-	1
Latvia	1	3
Lithuania	-	1
The Netherlands	22	26



Country	Dispatch	Destination
Poland	21	7
Portugal	11	4
Romania	2	2
Slovakia	5	5
Slovenia	3	2
Spain	5	9
Sweden	3	52
United Kingdom	20	12
<b>Further European countries</b>	<b>66</b>	<b>4</b>
of which OECD countries	58	3
of which non-OECD countries	8	1
Bosnia and Herzegovina	3	1
Croatia	3	-
Norway	53	-
Serbia	1	-
Switzerland	4	1
Turkey	-	2
Ukraine	2	-
<b>Non-European countries</b>	<b>3</b>	<b>78</b>
of which OECD countries	1	2
of which non-OECD countries	2	76
Benin	-	2
Cameroon	-	1
China	-	28
Ghana	-	5
Guinea	-	1
Hong Kong	-	8
India	-	11
Indonesia	-	1
Japan	1	-
Kazakhstan	1	-
Liberia	-	1
Nigeria	-	9
Pakistan	1 ***)	5 ***)
Syria	-	1
Taiwan	-	2
Togo	-	1
United States of America	-	2
<b>Sum of all cases reported **)</b>	<b>336</b>	<b>339</b>

\*) including six shipments from the Republic of Ireland to the Republic of Ireland through the territory of Northern Ireland

\*\*\*) Three shipments showed two different destination countries.

\*\*\*) One shipment with both dispatch and destination in Pakistan found in a French harbour; Annex VII was incomplete and recovery site was not mentioned.

The numbers in the column “dispatch” indicate the number of violation cases identified where the notifier or sender of the waste is located in the respective country listed in the left column, whereas the numbers in the right column “destination” indicate the number of violation cases, where the consignee indicated in the documents is located in the respective country.

This allows showing whether certain countries are typically prone to be either the origin or the destination of illegal waste shipments. Such a perspective may be biased due to the specific distribution of controls performed that was not equally distributed over the EU. Therefore the probability to be listed is higher for some countries than for others and this statistics should only be interpreted as descriptive.

As in the inspection periods before, there have been very few (only three) cases of violation for waste imports from non-European countries to the EU and – apart from one case from and to Pakistan explained in footnote \*\*\*) to Table 2-8 – no cases of waste transits from non-European countries via the EU to other non-European countries.

The share of illegal waste transports to non-OECD countries, especially to Africa and Asia, has decreased compared to earlier inspection period of IMPEL-TFS Enforcement Actions II. The highest occurrence of non-compliant waste transports resulted from mixed municipal waste streams across the border from Norway to Sweden lacking notification. It can be observed that the common series of road inspections along the Norwegian/Swedish border during the first part of June 2010, with joint participations of Swedish and Norwegian customs, was the measure within 2010 that brought the most quantitative finding of violations, although certainly not very grave ones.

#### *Allocation by underlying offence*

As in the previous phase IMPEL-TFS Enforcement Actions I, for this report a distinction is made between administrative violations and illegal shipments.

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

Violations of the shipment regulation are due to different reasons. Due to the introduction of adjusted new reporting forms, categories of violations given for selection in a drop-down list, and details of these violations have been completely reported. In two cases there has been more than one violation, which

was explained in the comment field. Table 2-9 gives an overview of the category of violation best describing the case on hand. As described in the previous chapter, 324 shipments were in violation.

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

- Administrative violations (Art. 18): 178 cases (53%)
- Illegal shipments due to EU legislation: 119 cases (35%)
- Others (especially violation of national and regional legislation): 41 cases (12%).

Table 2-9: Reasons for violations given in the total result transport inspection forms for Inspection Periods 5, 6 and 7

Violation	Number of cases			
	IP 5	IP 6	IP 7	Sum
Art. 18 Annex VII missing	14	1	13	28
Art. 18 Annex VII incomplete	50	51	47	148
Mixture not conform with indication of Annex VII	-	2	-	2
<b>Sum of administrative violations</b>	<b>64</b>	<b>54</b>	<b>60</b>	<b>178</b>
Subject to export ban	7	14	3	24
Notification missing	10	50	12	72
Notification, waste not as stated in notification documents	3	5	2	10
Notification, movement document incomplete, incorrect transport date, other routing	-	9	4	13
<b>Sum of illegal waste shipments</b>	<b>20</b>	<b>78</b>	<b>21</b>	<b>119</b>
National regulation	8	8	2	18
Documentation (consignment) missing	-	14	-	14
Other / not specified	1	4	4	9
<b>Sum of other violations</b>	<b>9</b>	<b>26</b>	<b>6</b>	<b>41</b>
<b>Sum of violations in total</b>	<b>93</b>	<b>158</b>	<b>87</b>	<b>338</b>

Compared to the first three inspection period, analysed in the interim project report of 2009, the share of administrative violations has increased and the shares of illegal waste shipments and other violations decreased.

Most shipments in the second group were to be classified as illegal export due to a notification obligation or a ban. The case of missing notifications has typically occurred for municipal waste from Norway to Sweden. Export bans are typically detectable with transports from the EU to countries in Africa or Asia. Another reason is deficits in notification documents (e.g. waste does not correspond to declaration, lacking permits). Problems with the prior information about the actual start of the shipment or an unauthorised change in transport route have been reported as reason for illegality in single cases.

There have also been a series of interceptions due to inconsistency with specific national requirements related to shipment of waste such as prior notification to authorities of green listed waste transports, use of specific national forms etc.

The new result form also allowed for the first time a complete analysis of the further actions undertaken by the categories offered in a drop-down list. This question on further actions replaced the section “Verification request – if yes or no, give reason and status” in previous result forms that in most cases did not show meaningful entries. The results are shown in Table 2-8Table 2-10:

Table 2-10: Further actions taken as a consequence of the violation in Inspection Periods 5, 6 and 7

Violation	Number of cases			
	IP 5	IP 6	IP 7	Sum
Repatriation: return to country of dispatch	11	16	19	46
Verification request to another country	5	1	-	6
Warning	19	26	28	73
Penalty	17	26	24	67
Pending	1	4	5	10
File prepared for prosecution	6	8	3	17
Call to complete Annex VII and apply for registration as a broker	11	-	-	11
Destruction of waste in a national recycling company	-	7	-	7
Other *)	1	10	8	19
Not specified	22	56	-	78
<b>Sum of further actions in total</b>	<b>93</b>	<b>154</b>	<b>87</b>	<b>323</b>

\*) Waste removed, shipment reloaded (NO); protocol made, notification procedure will be initialised by the company (BG), in case of crude tall oil the decision on waste or no waste was not yet taken (BE); demand for reload by customs (FR); in other cases the “other” category was chosen without explaining the action in detail.

The action “Repatriation: Return to country of dispatch” was frequently reported by Belgium, Hungary, Switzerland, Germany and Portugal. “Warning” was most frequently indicated by Cyprus, Czech Republic, Belgium and the Netherlands, and “Penalty” was the predominant term used for reporting by Austria, Germany, Hungary, Croatia and Belgium.

In cases of minor violations, often a warning without immediate legal consequences was enunciated. Due to the given drop-down list, only one of the option could be chosen, but additional explanations could be given in the comment field (section 6 of the form) or via E-Mail. It is known that in case that waste is repatriated to the country of dispatch, often also a penalty or warning is applicable. In such a case the most rigorous action (repatriation) has been counted. Future updates of result forms should allow the mentioning of double or multiple actions or a combination of actions.

#### *Allocation by waste type*

Furthermore an evaluation and assessment can be made as regards waste types involved in violations. This is subdivided in Table 2-11.

Table 2-11: Overview of types of waste involved in shipments that were in violation of WSR

Waste type	Number of cases				Most frequent violations
	IP 5	IP 6	IP 7	Sum	
Paper and cardboard	20	15	24	59	Art. 18 Annex VII document missing or incomplete
Municipal waste	-	52	2	54	Transports lacking notification or consignment
Metal waste	20	17	16	53	Art. 18 Annex VII document; contamination
Plastic waste	14	7	14	35	Art. 18 Annex VII document incomplete or missing
Waste electrical and electronic equipment	9	18	6	33	Export ban, Art. 18 Annex VII document incomplete
End-of-life vehicles / vehicle parts	2	6	9	17	Illegal export, contamination, worn out tyres
Textile waste	5	5	4	14	Illegal shipment without notification
Bio-degradable / green waste	3	3	3	9	
Organic chemicals / solvents	6	3	-	9	
Wood	2	2	1	5	Art. 18 Annex V document
Construction and demolition waste	-	2	1	3	
Batteries	1	-	-	1	
Other / Mixtures	9	15	7	31	Art. 18 Annex VII document; various
Not specified	2	9	1	12	
<b>Total</b>	<b>93</b>	<b>154</b>	<b>88</b>	<b>335</b>	

As in previous periods, paper and cardboard waste have been the largest categories prone to violation. In general figures for these waste categories are balanced sums of reporting from several countries of dispatch without clear predominance. However, sender countries of certain waste categories that have been identified more frequently have been the following:

- Paper and cardboard: Slovakia, Poland, Ireland, Czech Republic, United Kingdom, Germany
- Municipal waste: figures predominantly from Norway (due to large quantities of municipal waste exported from Norway across the EU border to Sweden)
- Metal waste: Denmark, Germany, Poland, France, The Netherlands, Czech Republic, Hungary, Cyprus, Finland
- Plastic waste: distributed on a low level over all sender countries
- WEEE: Germany, Portugal, Sweden, Greece, The Netherlands, Belgium
- Textile waste: Germany, Poland

- ELVs and vehicle parts: Cyprus, The Netherlands, Portugal, Spain, France
- Bio-degradable / green waste: Croatia, Switzerland
- Organic chemicals / solvents: Germany, Norway
- Wood: Belgium, Latvia
- Construction and demolition waste: Austria, The Netherlands, Ireland
- Batteries: Hungary

#### 2.2.4 Company inspections

For company inspections, the structure of total results inspection forms has been further adapted, so that the most interesting facts with regard to company inspections can be recorded and analysed in a direct way. The information whether the waste is envisaged for disposal or recovery was identified as less relevant for analysis within the working group of the Interim Conference, and therefore left out in the form.

The results of all company inspections, itemized to countries, the numbers of transboundary waste shipments inspected and of violations discovered are shown in Table 2-12.

Table 2-12: Reported numbers of company inspections from February to November 2010

Participant	Numbers of companies inspected			Transboundary waste shipments inspected	violations	%
	Total	Administrative	Physical			
Austria	2	2	2	1	0	0.0
Belgium	2	2	2	1	1	100.0
Cyprus	9	9	7	9	4	44.4
Czech Republic	8	8	8	4	3	75.0
Finland	2	2	2	2	1	50.0
Ireland	16	14	10	11	7	63.6
Portugal	1	1	1	1	1	100.0
Romania	2	2	2	9	8	88.9
Serbia	14	14	14	8	4	50.0
Slovenia	2	2	1	2	1	50.0
UK / Northern Ireland	5	5	5	281	0	0.0
<b>Overall IP5</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>169</b>	<b>7</b>	<b>4.1</b>
<b>Overall IP6</b>	<b>26</b>	<b>26</b>	<b>26</b>	<b>141</b>	<b>14</b>	<b>9.9</b>
<b>Overall IP7</b>	<b>19</b>	<b>17</b>	<b>11</b>	<b>19</b>	<b>9</b>	<b>47.4</b>
<b>Overall total</b>	<b>63</b>	<b>61</b>	<b>54</b>	<b>329</b>	<b>30</b>	<b>9.1</b>

Compared to previous inspection periods, more countries executed inspections of companies (11 instead of 6 in the first three inspection periods and 5 in Inspection Period 4).



The new total results company inspection form (used by most of experts reporting) was based on the structure of the form for transport inspections where applicable. Therefore, it allows the same types of analysis and statistics as in the chapter before in transport inspections.

Companies inspected can be the sender, trader or recipient of waste transports, and the reason or occasion to select a company for an inspection can be a routine control, a specific suspicion, e.g. the finding of a previous transport inspection, or the request enquired by another authority, e.g. an environmental inspectorate of other country. An overview of types of inspections and companies involved is shown in Table 2-13.

Table 2-13: Violations related to the type of inspection – the role of the country within the waste shipment process and the motive of inspection (based on information in Section 5 of the total results company inspection form)

Type of inspection and company	Number of cases			
	IP 5	IP 6	IP 7	Sum
on request – at the sender of waste	-	2	4	6
on request – at the consignee of waste	-	1	-	1
on request – at the trader of waste	3	-	1	4
due to suspicion – at the sender of waste	1	2	2	5
due to suspicion – at the consignee of waste	-	-	-	-
due to suspicion – at the trader of waste	-	-	1	1
routine inspection – at the sender of waste	2	8	1	11
routine inspection – at the consignee of waste	-	1	-	1
routine inspection – at the trader of waste	-	-	-	-
other	1	-	-	1
<b>Sum of violations discovered by company inspections</b>	<b>7</b>	<b>14</b>	<b>9</b>	<b>30</b>

These figures show that in total more violations have been discovered by routine inspections (40%) than by inspections requested by other authorities (37%) or inspections due to a concrete suspicion (20%). In the majority of cases (73%) the company sending the waste is accused of the violation.

#### *Allocation by country of dispatch and destination*

The following Table 2-14 shows the statistics of violations, broken down by countries of dispatch and destination of the waste shipments examined during company inspections.

Table 2-14: Violations related to dispatch and destination countries (based on information in Section 5 of the total results company inspection form):

Country	Dispatch	Destination
<b>EU countries</b>	<b>25</b>	<b>21</b>
Belgium	1	-
Cyprus	3	1
Czech Republic	2	1
Finland	1	-
France	-	1
Germany	-	2
Ireland	7	-
Italy	-	8
The Netherlands	-	1 *)
Poland	-	1
Portugal	1	-
Romania	9	-
Slovenia	1	-
Spain	-	1
United Kingdom	-	5
<b>Further European countries</b>	<b>5</b>	<b>5</b>
Croatia	-	1
Macedonia	-	4
Serbia	4	-
Switzerland	1	-
<b>Non-European countries</b>	<b>-</b>	<b>5</b>
Cameroon	-	2
India	-	1
Israel	-	1
Africa, not further specified	-	1
<b>Unknown</b>	<b>1</b>	<b>-</b>
<b>Sum of all cases reported</b>	<b>31</b>	<b>31</b>

\*) shipment envisaged to be sent via the Netherlands, final destination unknown

As for transport inspections, the numbers in the column “dispatch” indicate the number of violation cases identified where the notifier or sender of the waste is located in the respective country listed in the left column, whereas the numbers in the right column “destination” indicate the number of violation cases, where the consignee indicated in the documents is located in the respective country.

In general, the involvement of EU Member States and non-EU countries in violations shows a similar picture than for transport inspections. Due to the small number and uneven distribution of company inspections over EU Member States, significance for interpretation is even more limited than for the respective results of transport inspections. However, it shows that the additional and accompanying measure of examining the waste streams directly at the location of companies before or after transport and prior to further treatment brings additional insights, e.g. a good means for verification of previous findings at transport inspections.

### Allocation by underlying offence

As shown for transport inspections, Table 2-15 gives an overview of the category of violation best describing the violation case on hand discovered by inspection of companies.

Table 2-15: Reasons for violations given in the total result company inspection forms for Inspection Periods 5, 6 and 7

Violation	Number of cases			
	IP 5	IP 6	IP 7	Sum
Art. 18 Annex VII missing	1	3	2	6
Art. 18 Annex VII incomplete	-	6	2	8
<b>Sum of administrative violations</b>	<b>1</b>	<b>9</b>	<b>4</b>	<b>14</b>
Notification missing	-	1	1	2
Shipping documents missing	1	1	-	2
<b>Sum of illegal waste shipments</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>4</b>
No environmental permit of facility	-	-	2	2
Facility not in compliance with permit	-	1	-	1
Info on documentation not complete on site	-	1	-	1
Site not authorised for export	-	1	-	1
Acceptance of waste substance is not permitted by this company	-	-	1	1
<b>Company or site-related violation</b>	<b>-</b>	<b>3</b>	<b>3</b>	<b>6</b>
Administrative irregularity with national law	5	-	-	5
No contract available	-	-	2	2
<b>Sum of other violations</b>	<b>5</b>	<b>-</b>	<b>2</b>	<b>7</b>
<b>Sum of violations in total</b>	<b>7</b>	<b>14</b>	<b>10</b>	<b>31</b>

Due to the new categories given in the result form, a comparison to the results of previous inspection periods is not directly possible.

An analysis of further actions undertaken (offered in a drop-down list that was modified compared to the transport result form) shows Table 2-16:

Table 2-16: Further actions taken as a consequence of the violation in Inspection Periods 5, 6 and 7

Violation	Number of cases			
	IP 5	IP 6	IP 7	Sum
Warning letter	6	10	5	21
Legal report	-	-	2	2
Penalty	1	3	2	6
Pending	-	1	-	1
Other (temporarily stored, inspection of waste treatment processes)	-	-	1	1
<b>Sum of further actions in total</b>	<b>7</b>	<b>14</b>	<b>10</b>	<b>31</b>

In most of the cases a warning letter was enunciated.

### Allocation by waste type

Finally, also an evaluation and assessment is made as regards the waste types involved in violations. It is obvious that the relative contributions of waste types to violations are different to the case of transport inspections, which may be due to the controlled decision process which companies and processes dealing with waste are chosen as an object of a control. This is shown in Table 2-17:

Table 2-17: Overview of types of waste involved in shipments that were in violation of WSR

Waste type	Number of cases			
	IP 5	IP 6	IP 7	Sum
Plastic waste	1	6	2	9
Metal waste	1	3	1	5
End-of-life vehicles / vehicle parts	1	2	2	5
Batteries	3	-	1	4
Waste electrical and electronic equipment	-	1	1	2
Textile waste	-	1	-	1
Paper and cardboard waste	-	1	-	1
Sludges from physical/chemical treatment	1	-	-	1
Leather	-	-	1	1
Other / Mixtures	-	-	2	2
<b>Total</b>	<b>7</b>	<b>14</b>	<b>10</b>	<b>31</b>

In the context of the inspections carried out and reported throughout the Enforcement Actions Project II plastic waste has been the waste category most prone to violation due to one company having continuously sent several waste shipments during 2009 and 2010. Other main problem areas are metal waste, end-of life vehicles and parts (e.g. tyres) and batteries.

### 2.2.5 Verifications

In order to decide whether waste shipments under inspection are allowed or illegal, a verification can be performed after administrative checks (inspecting the transport documents) and/or physical inspection of the load. If this is not possible on the spot, it should be done formally and in written form to the authorities concerned, for example to verify whether the company of destination is existent and allowed to treat the shipped waste. During Inspection Periods 1 – 4 for each case of violation reported the total results transport inspection form contained the query whether a verification request was conducted (yes or no to be marked with a cross), the reason for yes or no and the status whether the verification request has already been executed or not. Since the answers given to this query, especially for “reasons given” and “status” have often not been specified, it was decided to change this question when updating the result forms in a similar way as the question on the type of violation. Therefore, in the new result forms country coordinators could select for each violation case in the column “Further Action” from a list of given potential circumstances. These options are shown in Table 2-18:

Table 2-18: Further Actions – options to be selected for violations in transport and company inspection results form

Further action	Total results transport inspection form	Total results company inspection form
	Repatriation: return to country of dispatch	Warning letter
	Verification request to another country	Administrative sanction
	Warning	Legal report
	Penalty	Penalty
	Pending	Other
	File prepared for prosecution	
	Other	

This allows an easier analysis of answers given for the cases of violation. In cases where the selection was missing, we asked the country coordinator or the person having sent the results right after having received them, together with further questions on the result figures if they were not completely understandable or inconsistent.

An analysis of further actions has been shown in the chapter of transport inspections (see Table 2-10) and of company inspections (see Table 2-16). In some cases other actions have been specified and explained in the comment field (e.g. taking the waste to a national recycling company for destruction).

The drop-down lists used in the new result forms have brought much better information on verification, especially in all those cases where a regularisation on the spot was not possible.

## 2.3 Cooperation and exchange of inspectors

### 2.3.1 Cooperation (Joint Inspections)

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

The following authorities on different ministry or subordinate executive levels supported the actions:

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

- Customs / Ministry of Finance
- Further local or regional authorities/municipalities
- Specialised authorities on the national, regional or local level, such as agencies for freight transport or for hazardous waste

Details on participating and cooperating partners of inspections, especially on the international level, are given in the Annex on Control activities reported to Enforcement Action II project by participating country.

For nearly all transport inspections, but also for a considerable part of company inspections (41%), a cooperation of different authorities has been practiced, at least on the national level. Table 2-19 gives an overview on the number of countries in inspections and the number of inspections with national and international cooperation during Inspection Periods 5, 6 and 7, compared to the previous periods of IMPEL-TFS II.

Table 2-19: Overview of national and international cooperation over all inspection periods (based on information of total results transport inspection forms and company inspection forms)

Type of action	Total IP 1-4 (October 2008 – November 2009)	IP 5 (March 2010)	IP 6 (June 2010)	IP 7 (Oct. 2010)	Total IP 5-7 (February 2010 – November 2010)	Total IMPEL- TFS Enforcement Actions II
Countries organizing inspections	20	22	21	20	26 <sup>1)</sup>	28 <sup>1)</sup>
Number of inspections	167	45	56	55	156	323
Inspections with cooperation between different national enforcement bodies	123	38	42	45	125	248
Inspections with international cooperation	45	19	24	20	63	108

<sup>1)</sup> 20 of the countries having participated in Inspection Periods 5 to 7 have already participated in at least one of the previous periods 1 - 4. New countries having actively participated in 2010 have been Bulgaria, Cyprus, France, Slovakia, Spain and Turkey.

On the basis of the reported data it can be concluded that during the three inspection periods 5, 6 and 7 during the year 2010:

- The number of countries organising inspections within one inspection period was higher than the interval of the previous inspection periods (12 – 17 countries);
- Waste shipment inspections (80%) were to a high degree performed on the basis of a cooperation of different authorities at national level;
- In 40% of the activities international cooperation could be achieved in terms of joint border controls, but also company and port controls. This share was much higher than the average of the first four inspection periods (27%).

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

- Austria and Czech Republic, Germany, Hungary, Slovakia, Slovenia
- Bulgaria and Greece, Romania, Serbia, Turkey
- Croatia and Slovenia
- Czech Republic and Austria, Slovakia
- Germany and Austria, Switzerland
- Hungary with Austria, Romania, Slovakia, Slovenia
- Ireland and Northern Ireland
- Netherlands with Germany
- Norway with Sweden
- Portugal and Spain
- Romania with Hungary
- Serbia with Bulgaria, Macedonia
- Slovakia with Austria, Czech Republic, Hungary
- Slovenia with Austria, Croatia, Hungary
- Switzerland with Germany
- Turkey with Bulgaria

This shows that joint border inspections have been considerably extended compared to the earlier inspection periods of IMPEL-TFS Enforcement Actions II, and have in 2010 covered most of the land borders with relevant transit freight traffic between those countries that have both been actively involved in IMPEL-TFS Enforcement Actions II.

In cases of company inspections, there has also been a series of international cooperations:

- Czech Republic with Germany, the Netherlands and Poland; in these cases there have been requests of the foreign authority
- Northern Ireland and the Republic of Ireland
- Cyprus with Greece (which was the country of destination of a transboundary waste shipment) and with Romania (within the framework of the exchange of inspectors)

### 2.3.2 Exchange of inspectors

Exchanging the expertise, experience and best practices of inspectors has also been an important pillar of the IMPEL-TFS programme. Supported by further funding available for 2010 by IMPEL, during the inspection periods V, VI and VII in 2010, there have been 11 further exchange activities with 19 countries having participated. Besides that, a twinning project between Austria and Bulgaria on transboundary shipment of wastes has been going on, financed by the European Union and implemented by Umweltbundesamt GmbH in Vienna and the Bulgarian Ministry for Environment and Water. Table 2-20 lists all exchange programs of IMPEL-TFS Enforcement Actions II during the inspection periods of the year 2010.

Table 2-20: Overview of exchange programs for inspectors during Inspection Periods 5, 6 and 7 (only those financed by IMPEL-TFS)

Hosting country	Foreign experts	Number of foreign experts	Focus
Hungary and Romania	Cyprus	1 from Cyprus	Road inspections (national border), coping with illegal waste shipments
France	Belgium	1 federal and 1 regional environmental officer of Belgium	Harbour inspections, networking, cooperation with police and customs, organisation of return shipments
United Kingdom (Scotland)	Norway	2 from Norway (Climate and Pollution Agency KLIF)	Company and road inspections, device for testing and verification of electric appliances, Operation Willow identifying unlicensed ELV operations, handset recovery company
The Netherlands	Spain	2 from Spain	Road inspections, use of data base and equipment in the field, auto recycling system (car dismantlers)
Estonia and Latvia (Baltic Exchange)	The Netherlands, Finland, Poland, Lithuania	1 from Finland, 1 from Lithuania, 2 from the Netherlands, 1 from Poland	Border, harbour and company inspections, recycling, collection, reuse and recovery systems, cooperation with customs, international cooperation and training
Ireland	Belgium	1 federal and 1 regional inspector of Belgium	Harbour inspections, exchange of inspection methods and criteria, customs scan-team, recycling companies
Spain	The Netherlands, Belgium	1 from the Netherlands (VROM), 1 from Belgium (Federal Public Service)	Road and port inspections, recycling companies, exchange of ideas with environmental authorities, customs and police
Germany	Slovenia	1 from Environmental Inspectorate, 1 from Police of Slovenia	Road inspections, responsibilities and cooperation of authorities (police, mobile customs unit, BAG), guidelines and organisation of road controls, waste collection, sorting and disposal systems
Austria and	Hungary	2 from National	Road inspections (motorway and



Hosting country	Foreign experts	Number of foreign experts	Focus
Germany		Inspectorate for Environment, Nature and Water of Hungary	border), guidelines and organisation of road controls
Cyprus	Romania	1 from Romania (participation of Hungary also planned)	Road, harbour and company inspections, cooperation with police and customs, waste management, treatment and recycling technologies
The Netherlands	Norway, Sweden	3 from Norway, 3 from Sweden	Harbour inspections, cooperation with customs, waste profiling, container scanning, safety checks during container inspections, biomass incineration
Belgium	Ireland	2 from Ireland	Harbour inspections, company inspection, exchange of best practises.
Belgium	Germany	2 from Germany (Hamburg)	Harbour inspections, road inspections, company inspections, exchange of best practises
Ireland	United Kingdom (Scotland)	2 from Scotland	Harbour inspections

Main subjects of the exchanges have been as follows:

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

Joint activities between neighbouring countries are also associated with a certain exchange function, and not all involved authorities have applied for IMPEL budgets. All in all, the year 2010 brought a further expansion and diversification of exchange programmes, with topics often on specific problems and ways of adaptation to the specific country situation.

## 2.4 Products and materials

### Update of the Waste Watch booklet

The copy rights of the Waste Watch booklet (stemming from 2007 and worked out during IMPEL-TFS Enforcement Actions I) have been acquired by VROM Inspectorate as specific service for information transfer and support to authorities in other countries. The electronic version can be directly used to elaborate the tool in any language. The document on CD together with a user instruction has been made available for dissemination by the project assistance with availability being announced in the project newsletters. Country coordinators and exports were continuously reminded of this offer, so even in 2010 further participating countries made use of it and ordered the document.

It was decided that during the final phase of IMPEL-TFS Enforcement Actions II the chance shall be taken to update this Waste Watch compendium based on the collected experience. Therefore, what has been done from October to December 2010 was to:

- ask all country coordinators, National Contact Points and further relevant experts to check and comment on the Waste Watch text, structure and pictures and to do proposals for changes and supplements
- collect and evaluate the proposals
- re-write the texts

The updated Waste Watch booklet has been presented and distributed at the Final Conference of IMPEL-TFS Enforcement Actions II in Belfast on 8 March 2011.

### Questionnaire on IMPEL-TFS Enforcement Actions II

For a feedback, all country coordinators were asked to answer a questionnaire on their experiences gained by IMPEL-TFS Enforcement Actions II and the preceding projects.

To gather information on the necessity of a follow-up project of IMPEL-TFS Enforcement Actions II this digital questionnaire has been sent to all country coordinators in August 2010. During one month responses have been received by 22 countries, of which 21 have already been participating, plus Luxemburg, showing the notice of intention to participate more actively in the future.

From the respondents 86.4 % carried out inspections at national level and with neighboring countries, and 72.7 % had participated in the exchange program. This means that the non-active countries of the project did not react on the questionnaire.

The IMPEL TFS Enforcement Actions project is for 71.4 % of the participating countries an important driver for organizing inspections that otherwise would not have been organized. If the project will not continue after June 2011 less or even no waste shipment inspections will be carried out in 45.5 % of the countries. The same percentage has answered that the same number of inspections will be carried out. A much higher percentage of 72.7 % answered that there will be less joint international inspections and less exchange of information with foreign countries.

For most participants contacts with foreign authorities are the most important aspect of the Enforcement Actions II project. Second is the exchange program. Also the inspection tools, conferences and stimulation of organizing inspections are important or very important for most country coordinators. The contacts with other countries strongly improved for most of the countries (61.9 %), and in many countries (42.9 %) there has also been a strong improvement of the contacts within the country. Improvements have also been identified with regard to an increased number of inspections, efficiency of the inspections and management and political attention. In general there was limited improvement of risk based inspections and verifications of waste destinations in other countries.

An important result of the project is that 66.7 % of the respondents answered that they identified or solved illegal shipments with the help of project participants of other countries. Several best examples of profit that participants have gained from the Enforcement Actions projects were mentioned.

All 21 participating countries have answered that the project needs a follow-up after June 2011. Several comments and proposals have been brought forward, some suggesting a continuation as practiced.

Suggestions for possible enlargements of the content within a follow-up project included the following aspects:

- the necessity of an up-stream project focusing more on dismantling, recycling, storage, treatment and waste management in general ( e.g. on car scrapping facilities, and companies dealing with E-waste).  
This also comprises the need for better ways of verification of suitability of treatment facilities in third countries, the creation of a European database including information about reliable facilities in third countries, setting up minimum standards for treatment facilities in third countries and ways of confirming them, and solving the problem of tracking which is the final facility that treats waste.
- Lessons learnt from this project with a description of most common illegal cases and non-conformities identified
- Introduction and further support of combined inspections and international exchanges with other countries
- More training so that trained inspectors can in a second step train their colleagues at home. This should comprise both specific language courses and the collection of practical problems arising during inspections and implementation of the Waste Shipment Regulation and the working out of a common practical guide for handling such situations
- Better inclusion of judiciary in the project in order to increase their familiarity with the consequences of illegal movement of waste
- Reliable way of calculating the financial guarantee covering 1013/2006/EC demands

## 3 Conclusions and recommendations

### 3.1 Development since Enforcement Actions I and Inspections in 2009

The development in 2010 showed a further confirmation that the Enforcement Action II project has been very successful and further contributed to the overall objective of improved enforcement of the EU Shipment Regulation both in number and quality of inspections performed. The following developments could be identified:

- The number of countries performing waste shipment inspections has increased from 17 in EA I over 22 in EA II (2008-2009) to 26, and even more important none of the countries participating in the earlier projects had stepped back.
- In comparison to 2009, further countries (ES, HU, RO, UK-SC, NO, SI, Baltic countries) participated in exchange programmes and the regional approach with respect to joint activities and exchanges could be reinforced. Twinning projects showed to be a helpful and effective tool to start and trigger inspections and joint activities.
- The number and rate of physical inspections could be further increased in particular in less experienced countries. This is a clear indicator that the policy objective and obligation of the WSR to perform inspections is increasingly well fulfilled.
- The detection rate of violations could be raised from 15% EA I over 19% in 2009 to 24%. One of the underlying reasons could be increased experience of participating experts, which would mean that one of the project objectives as defined in the Terms of Reference has been achieved.
- Additional enforcement tools could be developed and/or provided.

Comparing the participation of countries in inspections and exchanges between Enforcement Actions I and between 2009 and 2010, it can be concluded that:

1. The number countries performing joint activities as well as the international knowledge exchange and the communication on “expert” level could be further increased, meeting another of the objectives set in the project ToR.
2. The control of waste exports from the EU and other European countries continued to slightly increase even if during joint activities at border crossings, control focus continued to be on the import side due to the existence of appropriate control spots such as parking lots. An important aspect in this respect is the inclusion of a number of additional borders and harbours in the Mediterranean and Black sea region.
3. For the UK participation in the project could be expanded to two regions and in Germany and Spain new regional authorities participated in 2010. However it needs to be clearly stated that concerning participation in this joint and harmonised IMPEL activity there is lack of information on the level of activity and approaches taken on the roads and in the harbours in parts of the Mediterranean namely in Spain, Italy and Greece.

As an overall conclusion it can be stated that although considerable improvements in participation have been made, European countries still did not reach a level playing field of waste shipment controls, and that the objective of bilateral and multilateral collaboration remains a problem in certain regions.

### **3.2 Recommendations for future joint enforcement actions and follow-up projects**

Based on the project results for 2010 and compared to the recommendation reported in the interim report for 2009 it can be stated that a majority of recommendations is still valid, whereas some of the previous recommendations could already be achieved or specific measures already have been taken, which hence are not an option for the future anymore.

Taking into account the achievements made and the results obtained during the two years project running time the following latest recommendations can be given for future project works:

1. Continue joint activities and information exchange
2. Continue work on more consistent participation and contribution to the IMPEL TFS enforcement activities in order to establish a level playing field as one of the highest priorities.
3. Continue efforts to further increase priority for enforcement of the EU WSR at the high level in the MS by appropriate measures (e.g. initiate large scale repatriation activities, publish incidents; promote bilateral agreements and MoU between neighbouring countries).
4. Further intensify direct expert contacts with neighbouring regions including as a potential option a dissemination of relevant information not only via national contact point and country coordinators, but also directly to other competent authorities both at central and regional level.
5. Ask the EC to provide further back-up and continued support for cooperation between countries in order to keep the process running
6. Continue and further enhance cooperation with customs and police in order to keep and expand the considerable improvements that have already been achieved. Focus on exchanges and on practical joint activities, including worldwide enforcement projects; as helpdesks and discussion forums<sup>2</sup> to promote and facilitate verification of waste shipments, have been established and are operating well.
7. Put capacity building on a broader basis with a stronger focus on regional cooperation.

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<sup>2</sup> BASECAMP on [www.impel.eu](http://www.impel.eu) and [helpdesk@waste-shipment.eu](mailto:helpdesk@waste-shipment.eu)

## Annexes

### Annex I: Inspection and exchange planning according to Interim Conference

Table 0-1: Announced joint inspections for inspection period V (March 2010)

	Joint inspection with (country)	port/ harbour	road	train	inland waterways	airport	company
AT							
BE	France The Netherlands	1	1				
BG	Turkey / Romania		1		1		
HR	Slovenia		2				
CY							
CZ							1
DE							
DK		2	2				
EE							
ES							
FI							
FR							
HU	Romania / Cyprus		1				
IE	Scotland / Northern Ireland						
IS							
IT							
LT							
LV							
MK							
MT							
NL							
UK-NI	Ireland	1	1				
NO							
PL							
PT	Spain	1	1				1
RO							
RS							
UK-SC							
SE							
SI	Croatia		1				
SK							
TR							

Table 0-2: Announced joint inspections for inspection period VI (June 2010)

	Joint inspection with (country)	port/ harbour	road	train	inland waterways	airport	company
AT	Germany						
BE	The Netherlands France	1 1	1				
BG							
HR	Germany/Czech Republic		1				
CY							
CZ	Germany (Saxony; Bavaria); Croatia		2 + 1				1
DE	Austria; Czech Republic; Czech Republic + Croatia		2 + 1		1		
DK		1					
EE							
ES							
FI	Estonia (combined)						
FR							
HU	Slovenia / Slovakia		1 + 1				
IE	Scotland + Northern Ireland	2	1				
IS							
IT							
LT	Estonia (combined)						
LV	Estonia (combined)						
MK							
MT							
NL	Estonia (combined)						
UK-NI							
NO	Sweden		2				
PL							
PT	Spain	1	1				1
RO							
RS							
UK-SC	Northern Ireland / Ireland	2					
SE							
SI	Hungary		1				
SK	Hungary		1				
TR							

Table 0-3: Announced joint inspections for inspection period VII (October 2010)

	Joint inspection with (country)	port/ harbour	road	train	inland waterways	airport	company
AT	Slovenia, Germany, Hungary						
BE	The Netherlands France	1 1	1				
BG	Austria Macedonia	1	1 1				
HR							
CY	Romania, Hungary						
CZ	Poland Slovakia		1 2				1
DE	Austria, Czech Republic		1		1		
DK		1					
EE							
ES							
FI							
FR							
HU	Austria		1				
IE							
IS							
IT							
LT							
LV							
MK							
MT							
NL							
UK-NI							
NO							
PL	Czech Republic		1				
PT	Spain	?	1				?
RO							
RS							
UK-SC	The Netherlands	2					
SE							
SI	Austria		1				
SK	Czech Republic		2				
TR							



Table 0-4: Announced planning for exchange programmes during 2010

	Send	Welcome	Period (month or exact date)	Comment (e.g. <u>number and profession of experts, special wishes</u> )	accepted by both countries
AT	Bulgaria		June 2010	Port inspections: 2 experts	
BE	France Ireland Spain	France	April – May 2010 June 2010 June 2010	Port inspections: 2 experts Port inspections: 1 to 2 experts Road inspections: 2 experts	
BG					
HR	Denmark		October 2010	Port inspections: 1 expert Road inspection: 1 expert	
CY		Hungary Romania	October 2010	Port inspections	
CZ					
DE	Netherlands			Port inspections	
DK					
EE					
ES	Netherlands		June	Port/Road/Company inspections (2/3 inspectors)	
FI					
FR					
HU	Austria Germany		October 2010	Road inspection at the border	
IE	Belgium	Everybody welcome	June 2010	Hazardous Waste + Port inspections	
IS					
IT					
LT	Netherlands			Port inspections: 2 experts Road inspections: 1 expert	
LV					
MK					
MT					
NL	Spain (together with Portugal and Belgium)		June 2010		
UK-NI					
NO	Scotland  Netherlands		September / October 2010 October 2010	Port/Road inspections: 1 to 2 Experts Port inspections: 1 to 2 experts	
PL					
PT	Spain	Spain	June 2010 October 2010	Road + company inspections Road + company inspections	
RO	Portugal		June 2010		
RS					
UK-SC		Norway Sweden			yes

	Send	Welcome	Period (month or exact date)	Comment (e.g. <u>number and profession of experts, special wishes</u> )	accepted by both countries
SE	Ireland, Scotland Netherlands		June 2010 October 2010	Harbour + company inspections	
SI	Germany (Lower Bavaria)			Road inspection: 3 experts	Yes
SK					
TR					

## Annex II: Control activities reported to Enforcement Action II project by participating country

### A: Inspection Period V (February 2010 – April 2010)

Table 0-5: Inspections planned and performed in Austria for Inspection Period 5

Date	Type and working method	Location	Comments
05.03.2010	Company	Lannach	Disposal company of used tyres
05.03.2010	Company	Peggau	Collection and recovery of domestic and commercial waste
16.03.2010	Transport (Border)	Border crossing AT/SK: Kittsee / Jarovce	Transport inspection of Slovakia at the border at the same time
24.03.2010	Transport (Border)	Border crossing AT/CZ: Drasenhofen / Mikulov	Transport inspection of Czech Republic at the border at the same time

Table 0-6: Inspections planned and performed in Belgium for Inspection Period 5

Date	Type and working method	Location	Comments
02.03.2010 *)	Transport / Seaport	Antwerp Seaport	Inspection of waste containers
03./04.03./ 15.03./ 29.03.2010 *)	Transport	Waremmе – Engis	ADR and waste inspection
08./09.03. 2010 *)	Transport / Seaport	Antwerp Seaport	Inspection of waste containers
10.03.2010	Transport	Walloon region	Night inspection
11.03.2010 *)	Transport	Hulplanche	Coordinated action within Belgian Action Plan "Truck transport control"
11./12.03. 2010 *)	Transport	Whole Territory of Belgium	BENEFRALUX action in almost all Belgian provinces within a period of 24 hours
16.10.2010 *)	Transport	Gent	
16.10.2010	Transport	Geel / Grobbendonk	International BENELUX action
16.10.2010 *)	Transport	Nivelles	Coordinated action within Belgian Action Plan "Truck transport control"
17.03./ 24./25.03./ 30.03.2010 *)	Transport	Eynatten	
25./26.03. 2010	Transport / Seaport	Ports of Antwerp and Zeebrugge	At port of Antwerp: Exchange with VROM / The Netherlands
30./31.03. 2010 *)	Transport / Seaport	Port of Antwerp	
02.03.2010 *)	Transport	Beveren - Waaslandhaven	
22.03.2010 *)	Transport	Visé	Coordinated action within Belgian Action Plan "Truck transport control"
26.03.2010 *)	Transport	Spy	

\*) not reported by result form due to limitation of three days per inspection period

Table 0-7: Inspections planned and performed in Bulgaria for Inspection Period 5

Date	Type and working method	Location	Comments
19.-21.04.2010	Transport (Border)	Border crossings BG/TR: Kapitan Andreevo (19.04.2010) and Lesovo (20./21.04.2010)	Cooperation with Turkey (Ministry of Environment and Forestry, customs) and Austria (Twinning advisors of Umweltbundesamt)

Table 0-8: Inspections planned and performed in Croatia for Inspection Period 5

Date	Type and working method	Location	Comments
18.03.2010	Transport (Border)	Border crossing HR/SI: Macelj	
25.03.2010	Transport (Border)	Border crossing HR/SI: Bregana / Obrežje	Cooperation with Inspection for Environmental and Spatial Planning, Slovenia

Table 0-9: Inspections planned and performed in Cyprus for Inspection Period 5

Date	Type and working method	Location	Comments
04.02.2010	Company	Nicosia	
18.03.2010	Transport / Seaport	Limassol Port	Inspection of export of compressors for oil and gas being removed
16.04.2010	Company	Nicosia	Inspection of used tyres for export whether they are in a condition suitable for further use

Table 0-10: Inspections planned and performed in Czech Republic for Inspection Period 5

Date	Type and working method	Location	Comments
04.03.2010	Company	Praha	No WSR violation, only administrative irregularity with national law discovered
24.03.2010	Transport (Border)	Border crossing CZ/AT: Mikulov / Drasenhofen	Joint inspection of Austria at the border at the same time, focus on entering transport

Table 0-11: Inspections planned and performed in Denmark for Inspection Period 5

Date	Type and working method	Location	Comments
02./03.03.2010	Transport / Harbour	Copenhagen, Frihavnen	
24./25.03.2010	Transport (Border)	Border crossing DK/DE: Padborg	

Table 0-12: Inspection planned and performed in Finland for Inspection Period 5

Date	Type and working method	Location	Comments
30.03.2010	Transport / Harbour	Ports of Turku, Naantali and Pansio	

Table 0-13: Inspection planned and performed in France for Inspection Period 5

Date	Type and working method	Location	Comments
March 2010	Transport / Harbour	Port of Dunkerque	

Table 0-14: Inspections planned and performed in Germany for Inspection Period 5

Date	Type and working method	Location	Comments
01.03.2010	Transport	Motorway A 3, Manzing (Lower Bavaria)	
04.03.2010	Transport	Motorway A 30 / A 31, Schüttdorf	Cooperation of Bundesamt für Güterverkehr (BAG) Hannover and police with VROM, The Netherlands
10.03.2010	Transport	Motorway A 3, Manzing (Lower Bavaria)	
17.03.2010	Transport	Motorway A 3, Sulzbach (Lower Bavaria)	

Table 0-15: Inspections planned and performed in Hungary for Inspection Period 5

Date	Type and working method	Location	Comments
23.03.2010	Transport (Border)	Border crossing HU/RO: Ártánd / Bors Oradea	Joint inspection with Romania (National Environmental Guard, General Commissariat and Country Commissariat Bihor, Police Frontier Inspectorate Bihor, customs) and Cyprus (Ministry of Agriculture and Environment)

Table 0-16: Inspections planned and performed in Ireland for Inspection Period 5

Date	Type and working method	Location	Comments
23.-25.03.2010	Transport	Leinster, Ulster and Munster Regions	Cooperation with Northern Ireland Environment Agency
24.03./25.03.2010	Company	Cork	Cooperation with Northern Ireland Environment Agency

Table 0-17: Inspections planned and performed in The Netherlands for Inspection Period 5

Date	Type and working method	Location	Comments
24.02.2010	Transport (Border)	Motorway A 12, border crossing NL/DE	
05.03.2010	Transport / Harbour	Port of Rotterdam	Part of a pilot cooperation project of different organisations (Harbour police, Regionaal Milieu Team Rotterdam-Rijnmond, customs)
09.03.2010	Transport	Motorway A 67, Blerick (Limburg Noord)	

Table 0-18: Inspections planned and performed in United Kingdom/Northern Ireland for Inspection Period 5

Date	Type and working method	Location	Comments
23.-25.03.2010	Company	Licensed waste facilities, Armagh and Belfast	Cooperation with Republic of Ireland (Dublin City Council)
23.-25.03.2010	Transport / Harbour	Harbours of Larne, Warrenpoint (Roll-on/roll-off terminal) and Belfast (container terminals and Roll-on/roll-off terminals)	

Table 0-19: Inspections planned and performed in Poland for Inspection Period 5

Date	Type and working method	Location	Comments
17./18.03.2010 *)	Transport (Border)	Border crossing points PL/DE	
24.03.2010	Transport / Harbour	Seaport of Szczecin	
25./26.03.2010	Transport (Borders and national roads)	Border crossings PL/SK, PL/DE (Olszyna), PL/UA (Korczowa and Medyka), several national roads (Nałęcz, Lipowica, Barwinek, Tarnobrzeg, Rzeszów, Jedrzejow and central Poland)	
26.03.2010	Transport (Rail border)	Rail transport border PL/UA: Medyka	
30.03.2010 *)	Transport / Harbour	Seaport of Gdansk	
29.-31.03. / 09.04. / 14.04.2010 *)	Transport (Borders, highways and national roads)	Border crossings PL/RU (Bezledy), PL/LT (Budzisko), PL-CZ (Katowice), highway and national road controls (Warsaw-Berlin; Kalisz-Sieradz and other locations)	

\*) not counted in result form due to limitation of three days per inspection period

Table 0-20: Inspections planned and performed in Portugal for Inspection Period 5

Date	Type and working method	Location	Comments
08.-11.03.2010	Transport (Border)	7 land borders PT/ES (Quintanilha, Segura, S. Leonardo, V. Formoso, Elvas, Valença, Chaves, Vila Real de Santo Antonio)	Cooperation with Spain (Xunta de Galicia – Inspeccion del medioambiente, Junta de Castilla y León del Médio Ambiente, SEPRONA – Spanish police for the environment –, Guardia Civil)
08.-11.03.2010	Transport / Harbour	Seaport of Lisbon	

Table 0-21: Inspections planned and performed in Romania for Inspection Period 5

Date	Type and working method	Location	Comments
23.03.2010	Transport (Border)	Border crossing RO/HU: Bors Oradea / Ártánd	Joint inspection with Hungary (National Inspectorate and Trans-Tisza-District Inspectorate for Environment, Nature and Water, Regional Directorate of the Hungarian Customs and Finance Guard); results jointly reported by Hungary

Table 0-22: Inspections planned and performed in Serbia for Inspection Period 5

Date	Type and working method	Location	Comments
16.03. – 30.04.2010	Company	Bujanovac, Niš, Surdulica	
16.03. – 30.04.2010	Transport (Border)	Border crossing RS/MK: Preševo	Cooperation with FYR Macedonia (Ministry of Environment and Spatial Planning)

Table 0-23: Inspections planned and performed in Slovakia for Inspection Period 5

Date	Type and working method	Location	Comments
16.03.2010	Transport (Border)	Border crossing SK/AT: Jarovce / Kittsee	Cooperation with Austria (Ministry of Environment); transport inspection of Austria at the border at the same time

Table 0-24: Inspections planned and performed in Slovenia for Inspection Period 5

Date/Time	Type and working method	Location	Comments
16.03.2010	Company	Lesce	Producer of computer peripheral equipment (cartridges)
25.03.2010	Transport (Border)	Border crossing HR/SI: Obrežje / Bregana	Cooperation with Ministry of Environmental Protection, Croatia
22.04.2010	Transport (Rail)	Railway shunting station Ljubljana-Zalog	

Table 0-25: Inspections planned and performed in Spain for Inspection Period 5

Date	Type and working method	Location	Comments
08.-10.03.2010	Transport (Border)	Land borders ES/PT (Chaves, Valença)	Cooperation with Portugal (Inspeção-Geral do Ambiente e do Ordenamento do Território – IGAOT and GNR/SEPNA (Police for the environment); results jointly reported by Portugal

Table 0-26: Inspections planned and performed in Turkey for Inspection Period 5

Date	Type and working method	Location	Comments
20.04.2010	Transport (Border)	Border crossing TR/BG: Kapıkule	Cooperation with Bulgaria (Ministry of Environment and Water, Bulgarian Border Police) and Austria (Umweltbundesamt, twinning activity with Bulgaria)



## B: Inspection Period VI (May – July 2010)

Table 0-27: Inspections planned and performed in Austria for Inspection Period 6

Date	Type and working method	Location	Comments
07.06.2010	Transport (Border)	Border crossing AT/DE: Saalbrücke	Exchange with Bulgaria (Ministry of Environment and Bulgarian customs)
08.06.2010	Transport (Border)	Border crossing AT/DE: Walserberg	Exchange with Bulgaria (Ministry of Environment and Bulgarian customs)
09./10.06. 2010	Transport (Border)	Border crossing AT/DE: Suben and Braunau	Exchange with Bulgaria (Ministry of Environment and Bulgarian customs) and Germany (Government of Lower Bavaria)
07.06.2010	Transport	Motorway A 12, checkpoint Kundl	
08./09.06. 2010	Transport	Motorway A 13, checkpoint Nösslach	
10.06.2010	Transport	Motorway A 12, checkpoint Langkampfen	

Table 0-28: Inspections planned and performed in Belgium for Inspection Period 6

Date	Type and working method	Location	Comments
17.06.2010	Transport / Harbour	Port of Antwerp	Collaboration with customs and Gendarmerie of France and customs and Environmental Inspectorate of Luxemburg. Inspection of trucks and trailers stocked with E-waste
23./24.06. 2010	Transport	BENEFRALUX action on the whole territory of Belgium	This action took place in almost all Belgian provinces within a period of 24 hours
29.06.2010	Transport / Harbour	Port of Antwerp	Inspection of trucks and trailers stocked with E-waste

Table 0-29: Inspections planned and performed in Bulgaria for Inspection Period 6

Date	Type and working method	Location	Comments
10./11.05. 2010	Transport (Border)	Border crossing BG/RS: Kalotina	Cooperation with Serbia (Ministry of Environment and Spatial Planning, Ministry of Police, Ministry of Finance – Custom Administration) and Austria (Twinning advisors of Umweltbundesamt)
15./16.06. 2010	Transport (Border)	Border crossing BG/RO: Ruse	Cooperation with authorities of Romania and Austria (Twinning advisors of Umweltbundesamt)
17./18.06. 2010	Transport / Harbour	Harbours in Varna West (17.06.) and Varna East (18.06.)	Cooperation with Austria (Twinning advisors of Umweltbundesamt)

Table 0-30: Inspections planned and performed in Croatia for Inspection Period 6

Date	Type and working method	Location	Comments
15.06.2010	Transport (Border)	Border crossing HR/SI: Macelj	

Table 0-31: Inspections planned and performed in Cyprus for Inspection Period 6

Date	Type and working method	Location	Comments
07.06.2010	Company	Larnaca	
14.06.2010	Company	Limassol	Issue / verification was still pending
14.07.2010	Company	Nicosia	Inspection of used tyres for export whether they are in a condition suitable for further use

Table 0-32: Inspections planned and performed in Czech Republic for Inspection Period 6

Date	Type and working method	Location	Comments
10.05./ 17.-19.05./ 18.06./28.06./ 14.07.2010	Company	7 companies in Pardubice, Ostrava, Luhačovice, Mokrá, Boskovice, Mariánské Lázně, Praha	Cooperation with Germany (Landesdirektion Dresden), The Netherlands (VROM) and Poland (GIOŚ - Chief Inspectorate of Environmental Protection), inspections mainly on request of these authorities

Table 0-33: Inspections planned and performed in Denmark for Inspection Period 6

Date	Type and working method	Location	Comments
04.05.2010	Transport / Harbour	Rødby Harbour	
06.05.2010	Transport / Harbour	Gedser Harbour	
18.05. – 20.05.2010	Transport / Harbour	Hirtshals and Frederikshavn Harbours	
09.06. – 10.06.2010 *)	Transport / Harbour	Copenhagen Frihavn	

\*) not reported by result form due to limitation of three days per inspection period

Table 0-34: Inspection planned and performed in France for Inspection Period 6

Date	Type and working method	Location	Comments
09.-10.06. 2010	Transport / Harbour	Port of Marseille	

Table 0-35: Inspections planned and performed in Germany for Inspection Period 6

Date	Type and working method	Location	Comments
09.-10.06.2010	Transport	Motorway A 3, Sulzbach (near border DE/AT Suben)	Cooperation with Austria (Ministry of Environment)
15.06.2010	Transport	Motorway A 3, Manzing (near Hengersberg)	
11./16./21.06.2010	Transport	Motorway A 1 and A 30 (BAG district Münster)	
08./09./30.06.2010	Transport	Motorway A 11, Berlin - Szczecin	
30.06.2010	Transport	Motorway A 17 (BAG district Dresden)	Exchange with Czech Republic (Czech Environmental Inspectorate and Ministry of Environment)

Table 0-36: Inspections planned and performed in Hungary for Inspection Period 6

Date	Type and working method	Location	Comments
15.06.2010	Transport (Border)	Border crossing HU/SK: Tornyosnémeti/Seňa	Joint inspection with Slovakia (National and Regional Inspectorate of the Environment, customs and Ministry of the Environment)
29.06.2010	Transport (Border)	Border crossing HU/SI: Tornyiszentmiklós/Pince	Joint inspection with Slovenia (Inspectorate for Environment and Spatial Planning, border police, border customs and customs mobile unit, Environmental Agency)

Table 0-37: Inspections planned and performed in Ireland for Inspection Period 6

Date	Type and working method	Location	Comments
09./10./12.06.2010	Company	5 companies in various locations in Ireland	
09./10./12.06.2010	Transport	Various locations in Ireland	Cooperation with Northern Ireland Environmental Agency, exchange with Belgium

Table 0-38: Inspections planned and performed in the Netherlands for Inspection Period 6

Date	Type and working method	Location	Comments
07.06.2010 *)	Transport (Port/pre-shipment)	Eemshaven Port, Port of Delfzijl	
09./10.06. 2010	Transport (Port/pre-shipment)	Port of Amsterdam	
10./11.06. 2010	Transport	Motorway A2 – A76, Elsloo	
22.06.2010	Transport / Harbour	Ferry terminal Norfolkline, Vlaardingen	Coordinated action with United Kingdom (Environmental Protection Agency), briefing by e-mail and telephone

\*) no findings with regard to TFS, therefore results not reported

Table 0-39: Inspections planned and performed in United Kingdom/Northern Ireland for Inspection Period 6

Date	Type and working method	Location	Comments
10./22./23.06. 2010	Transport / Harbour	Harbours of Larne, Warrenpoint and Belfast	Cooperation with Republic of Ireland (Dublin City Council), Scotland (Scottish Environmental Protection Agency) and Belgium (Federal Environmental Inspectorate and Flemish Environmental Inspectorate Department)
10./23.06. 2010	Company	Newry and Londonderry, waste management companies	

Table 0-40: Inspections planned and performed in Norway for Inspection Period 6

Date	Type and working method	Location	Comments
31.05.- 11.06.2010	Transport (Border / Harbour)	Series of road inspections across the border NO/SE, in addition 10 ferry departures and 7 container shipments checked	Joint inspections with Norwegian and Swedish customs

Table 0-41: Inspections planned and performed in Poland for Inspection Period 6

Date	Type and working method	Location	Comments
11./18./25.06. 2010	Transport (Seaport, road and rail terminal)	Various locations in Poland	

Table 0-42: Inspections planned and performed in Portugal for Inspection Period 6

Date	Type and working method	Location	Comments
21.-23.06.2010	Transport (Border)	10 land borders PT/ES	Cooperation with Spain (Xunta de Galicia – Inspeccion del medioambiente, Junta de Castilla y León del Médio Ambiente, SEPRONA – Spanish police for the environment –, Guardia Civil); follow-up action on 24.06.2010 at the border Chaves/Verín with participation of inspectors from the Netherlands and Belgium
21.-23.06.2010	Company	Waste manager site	Follow-up inspection at the sender company due to a truck with contaminated crushed ELVs returned to the site, inducement and check of decontamination

Table 0-43: Inspections planned and performed in Romania for Inspection Period 6

Date	Type and working method	Location	Comments
08.06.2010	Company	Mosnita Noua, Timis county	Company continuously sending waste to Italy in 2009/2010 with incomplete Annex VII

Table 0-44: Inspections planned and performed in United Kingdom/Scotland for Inspection Period 6

Date	Type and working method	Location	Comments
22.06.2010	Transport / Harbour	Ferry ports of Stranraer, Rosyth and Cairnryan (Norfolkline, Stena and P&O)	

Table 0-45: Inspections planned and performed in Serbia for Inspection Period 6

Date	Type and working method	Location	Comments
01.05. – 31.05.2010	Company	Bujanovac, Niš, Surdulica	
10./11.05.2010	Transport (Border)	Border crossing RS/BG: Gradina	Cooperation with Bulgaria (Ministry of Environment and Spatial Planning)

Table 0-46: Inspections planned and performed in Slovakia for Inspection Period 6

Date	Type and working method	Location	Comments
15.06.2010	Transport (Border)	Border crossing SK/HU: Milhošť-Tornyošnémeti	Joint inspection with Hungary (National and Regional Inspectorate for Environment, Nature and Water, Regional Directorate of the Customs and Finance Guard)

Table 0-47: Inspections planned and performed in Slovenia for Inspection Period 6

Date/Time	Type and working method	Location	Comments
10.06.2010	Transport / Harbour	Seaport of Koper (Container and Roll-on-roll-off Terminal)	
29.06.2010	Transport (Border)	Border crossing SI/HU: Pince/Tornyiszentmiklós	Joint inspection with Hungary (National Inspectorate for Environment, Nature and Water, Regional Directorate of Customs and Finance Guard)

Table 0-48: Inspections planned and performed in Spain for Inspection Period 6

Date	Type and working method	Location	Comments
21.-23.06.2010	Transport (Border)	Land borders ES/PT (Chaves, Valença)	Cooperation with Portugal (Inspeção-Geral do Ambiente e do Ordenamento do Território – IGAOT and GNR/SEPNA (Police for the environment); results jointly reported by Portugal)

### C: Inspection Period VII (September – November 2010)

Table 0-49: Inspections planned and performed in Austria for Inspection Period 7

Date	Type and working method	Location	Comments
04.10.2010	Transport	Motorway A 10, checkpoint Kuchl	
05.10.2010	Transport (Border)	Border crossing AT/DE: Walsberg	
06./07.10. 2010	Transport (Border)	Border crossing AT/DE: Suben/Braunau	Exchange with Germany (Government of Lower Bavaria and Police) and Hungary (National Inspectorate)
04.10.2010	Transport	European route E 66, checkpoint Leisach	
05./06.10. 2010	Transport	Motorway A 10, checkpoint Kellerberg	
07./08.10.2010	Transport (Border)	Border crossing AT/SI: Spielfeld	Cooperation with Slovenia (Regional Inspectorate Kranj and customs)

Table 0-50: Inspections planned and performed in Belgium for Inspection Period 7

Date/Time	Type and working method	Location	Comments
02.10.2010	Transport	European route E 34, Turnhout	Road control in the framework of the European AUGIAS project; cooperation with the Netherlands (Dutch road police)
05.10.2010	Transport / Harbour	Ports of Antwerp and Zeebrugge	Seaport control in the framework of the European AUGIAS project; inspection of waste containers based on booking lists and/or selection based on risk analysis by customs
07.10.2010	Transport	Road N 369, Veurne-Diksmuide	Road controls in the framework of the European AUGIAS project
14.10.2010	Transport	European route E 17, Kortrijk	
08.10.2010	Company	Brussels Capital Region	Metal recovery plant, metal residues treated in a limited post shredder installation
28.10.2010	Company	Brussels Capital Region	Second hand trader of electrical and electronic equipment, follow-up inspection due to illegal WEEE exports to Africa; company should sort out WEEE from possible reusable EEE

Table 0-51: Inspections planned and performed in Cyprus for Inspection Period 7

Date	Type and working method	Location	Comments
04./07./08.10.2010	Transport	Road to Limassol port	AUGIAS project; inspection of trucks carrying containers to the port for export
04./05./08.10.2010	Transport / Harbour	Limassol port	Inspection of 3 containers and 1 vessel at the port
20.10.2010	Transport / Harbour	Limassol port	Exchange and cooperation with Romania (National Environmental Guard); inspection of 1 vessel and 2 containers at the port
20./21.10.2010	Company	Limassol district (2 companies), Nicosia district (2 companies)	Exchange and cooperation with Romania (National Environmental Guard); 1 used tyres recycling company, 1 clinical and pharmaceutical waste management company and 2 ELV, WEEE and scrap metals recycling companies

Table 0-52: Inspections planned and performed in Czech Republic for Inspection Period 7

Date	Type and working method	Location	Comments
16.09.2010	Transport (Border)	Border crossing CZ/SK: Mosty u Jablunkova / Svrčinovec	Transport inspection of Slovakia at the border at the same time; controls focused on entering transport
16.09.2010	Transport (Border)	Border crossing CZ/SK: Břeclav / Kúty Brodské	Transport inspection of Slovakia at the border at the same time; controls focused on entering transport

Table 0-53: Inspections planned and performed in Denmark for Inspection Period 7

Date	Type and working method	Location	Comments
04.-08.10.2010	Transport	Padborg	AUGIAS project (Results still missing)

Table 0-54: Inspections planned and performed in Estonia for Inspection Period 7

Date/Time	Type and working method	Location	Comments
05.10.2010	Transport	Motorways	Collaboration with AUGIAS project
07.10.2010	Transport / Harbour	Port of Paldiski	
08.10.2010	Transport / Rail	Tartu railway station	
12.10.2010	Transport (Border)	Border crossing EE/LV	



Table 0-55: Inspections planned and performed in Finland for Inspection Period 7

Date/Time	Type and working method	Location	Comments
20.10.2010	Company	Espoo, Raasepori	Inspection of waste stored to be exported, of waste treatment processes and of Annex VII documents of previous shipments
03.11.2010	Company	Espoo	

Table 0-56: Inspection planned and performed in France for Inspection Period 7

Date	Type and working method	Location	Comments
October 2010	Transport / Harbour	Port of Le Havre	

Table 0-57: Inspections planned and performed in Germany for Inspection Period 7

Date	Type and working method	Location	Comments
27.09.2010	Transport (Road and rail)	Border crossings DE/CH: Region Weil am Rhein, Rheinfelden, Dreirosen, Basel	Cooperation / joint inspection with Switzerland: Federal Department for the Environment, Swiss customs, Cantonal authorities (BS, BL, AG); results jointly reported by Switzerland
05.10.2010	Transport	Motorway A 3 near border DE/AT	Exchange with Slovenia (Inspectorate for environment and spatial planning; General Police Directorate)
06.10.2010	Transport	Motorway A 3, Manzing (near Hengersberg)	
07.10.2010	Transport	Motorway A 3, Ruhstorf (near border DE/AT)	
14.10.2010	Transport	Motorway A 3 near border DE/AT	

Table 0-58: Inspections planned and performed in Hungary for Inspection Period 7

Date/Time	Type and working method	Location	Comments
21.10.2010	Transport (Border)	Border crossing HU/AT: Hegyeshalom / Nickelsdorf	Cooperation/joint inspection with Austria (Federal Ministry of Agriculture, Forestry, Environment and Water Management; police; customs; Federal Environmental Agency)

Table 0-59: Inspections planned and performed in Ireland for Inspection Period 7

Date	Type and working method	Location	Comments
19.10./21.10.2010	Company	4 companies in: Monasterboice, Co. Louth; Letterkenny, Co. Donegal; Kilcock, Co. Kildare; Ballylynch, Carrick-on-Suir, Co. Tipperary	
19.-21.10.2010	Transport	Cookstown, Ballymount, Dublin, and Dunleer, Co. Louth	
19./20.10.2010	Transport / Harbour	Seatruck Ferries, Dublin port	
20./21.10.2010	Transport / Harbour	Tivoli Container Terminal (20.10.) and Dublin Ferry Terminal (21.10.)	Cooperation with UK/Scotland (Scottish Environmental Protection Agency)

Table 0-60: Inspections planned and performed in the Netherlands for Inspection Period 7

Date	Type and working method	Location	Comments
08.10.2010	Transport (Border)	Motorway A 1, border crossing NL/DE	Regular collaboration with German Enforcement Officers / BAG
13.10.2010	Transport (Harbour)	Ferry terminal Rotterdam	Pre-arrival shipment
19.10.2010	Transport (Harbour)	Ferry terminal Vlaardingen	Joint inspection as part of the program of the exchange of Swedish (Environmental Protection Agency) and Norwegian inspectors (Climate and Pollution Agency - KLIF); pre-arrival shipment

Table 0-61: Inspections planned and performed in United Kingdom/Northern Ireland for Inspection Period 7

Date/Time	Type and working method	Location	Comments
13.-15.10.2010	Transport (Harbour and Road)	Larne Weighbridge, Larne Port, Belfast Port, Roads A2 Warrenpoint and A1 Loughbrickland	

Table 0-62: Inspections planned and performed in Poland for Inspection Period 7

Date	Type and working method	Location	Comments
08./14./25.10.2010	Transport (Seaports, road and railways)	Harbour in Gdynia (Container Terminal) and harbour in Szczecin (Nadbrzeże Łosztownia); various locations all over Poland	

Table 0-63: Inspections planned and performed in Portugal for Inspection Period 7

Date/Time	Type and working method	Location	Comments
11.-15.10.2010	Transport (Border)	10 land borders PT/ES	Cooperation with Spain (Xunta de Galicia – Inspeccion del medioambiente, SEPRONA – Spanish police for the environment –, Guardia Civil)

Table 0-64: Inspections planned and performed in Romania for Inspection Period 7

Date	Type and working method	Location	Comments
05.10.2010	Company	Arad	Sponge waste: missing Annex VII (company considers it as raw material, not as waste); leather waste: incomplete Annex VII

Table 0-65: Inspections planned and performed in Slovakia for Inspection Period 7

Date	Type and working method	Location	Comments
16.09.2010	Transport (Border)	Border crossing SK/CZ: Svrčinovec / Mosty u Jablunkova	Cooperation with Czech Republic (Inspectorate of the Environment); transport inspection of Czech Republic at the border at the same time; controls focused on entering transport
16.09.2010	Transport (Border)	Border crossing SK/CZ: Kúty Brodské / Břeclav	Cooperation with Czech Republic (Inspectorate of the Environment); transport inspection of Czech Republic at the border at the same time; controls focused on entering transport
04./05.10.2010 *)	Transport (Border)	4 border crossings SK/CZ	AUGIAS project
06.10.2010	Transport (Border)	Border crossing SK/AT: Jarovce / Kittsee	AUGIAS project
06.-08.10.2010 *)	Transport (Border)	5 border crossings SK/HU	AUGIAS project

\*) no further violations with regard to TFS found; results not reported due to limitation of three days per inspection period

Table 0-66: Inspections planned and performed in Slovenia for Inspection Period 7

Date	Type and working method	Location	Comments
07./08.10.2010	Transport (Border)	Border crossing SI/AT: Šentilj / Spielfeld	Cooperation with Austria (Federal Ministry of Agriculture, Forestry, Environment and Water Management); 07. October: import to Slovenia; 08. October: export from Slovenia
19.10.2010	Transport (Border)	Border crossing SI/HR: Gruškovje - Macelj	Cooperation with Croatia (Ministry of Environment, land use planning and construction)
22.10.2010	Company	Kranj	Trader; notification missing for export to Croatia

Table 0-67: Inspections planned and performed in Sweden for Inspection Period 7

Date	Type and working method	Location	Comments
October 2010	Transport	Counties of Stockholm, Norrbotten and Västerbotten	AUGIAS project
October 2010	Transport / Harbour	Counties of Stockholm, Norrbotten and Västerbotten	AUGIAS project

Table 0-68: Inspections planned and performed in Switzerland for Inspection Period 7

Date	Type and working method	Location	Comments
27.09.2010	Transport (Road and rail)	Border crossings CH/DE: Region Basel, Weil am Rhein, Rheinfelden, Dreirosen	Cooperation / joint inspection with Germany: Sonderabfallagentur Baden-Württemberg, German customs, Regierungspräsidium Freiburg

## D: Interim inspections during and beyond inspection periods

Table 0-69: Further inspections performed in Bulgaria during the year 2010

Date	Type and working method	Location	Comments
18./19.08.2010	Transport (Border)	Border crossing BG/GR: Kulata	Cooperation with authorities of Greece and Austria (Twinning advisors of Umweltbundesamt)

Table 0-70: Further inspections performed in Cyprus during the year 2010

Date	Type and working method	Location	Comments
15.01.2010	Transport / Seaport	Limassol Port	Inspection of two containers declared as scrap metals due to suspicion of illegal export of car spare parts from illegal end-of-life vehicles treatment

Table 0-71: Further inspections performed in Denmark during the year 2010

Date	Type and working method	Location	Comments
18.-19.08.2010	Transport / Harbour	Copenhagen Frihavn	

Table 0-72: Further inspections performed in Germany during the year 2010

Date	Type and working method	Location	Comments
09.09./14.09./23.09.2010	Transport	Motorway A 7 Hannover-Fulda, near Felsberg, region of Hesse	Ad-hoc inspections of Regierungspräsidium Kassel, region of Hesse, and Bundesamt für Güterverkehr (BAG)

Table 0-73: Further inspections performed in Sweden during the year 2010

Date	Type and working method	Location	Comments
January – December 2010	Transport / Seaport	Harbours in Stockholm, (containerhamnen and Frihamnen), Gothenburg, Malmö, Gävle, Helsingborg and Södertälje	23 ad-hoc inspections of waste to be exported, 13 of them to Africa subject to an export ban

Table 0-74: Customs inspections performed in Switzerland during the year 2010

Date	Type and working method	Location	Comments
January – July 2010	Transport (border), customs controls of outbound traffic	Borders of Switzerland with neighbour countries	Controls of outbound traffic have been undertaken systematically during regular and permanent customs activities at the borders. Customs officers have a systematic look at cases of potential transfrontier waste transports declared as goods and suspected of being illegal.

### **Annex III: Up-dated reporting forms**

The updated total results transport inspection form and the updated total results company inspection form (in the versions that have been available for use from Inspection Period 6 on) are attached as Excel files. They are available both in the latest Excel version for Vista and in an Excel 97-2003 version. Due to the format, these forms cannot be shown on one page in a readable font size.

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