

European Union Network for
the Implementation and Enforcement
of Environmental Law

Waste Sites

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Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the EU Member States, acceding and candidate countries of the European Union and EEA countries. The association is registered in Belgium and its legal seat is in Bruxelles, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 6th Environment Action Programme and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

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

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Executive summary: <p>The Waste Sites project was started in early 2011, based on the view that in order to check the growth of illegal waste exports from the EU – notably of e-waste and end-of-life vehicles – it is necessary to target more effectively the sources of these waste streams and the “upstream” facilities where the waste is collected, stored and/or treated before the export. Site-oriented policing measures have advantages compared to transport inspections in so far as they focus on local and regional hubs of the waste trade instead of accidentally intercepting individual shipments, they involve larger quantities of the waste, and they are more likely to uncover the underlying structure of the business behind illegal exports.</p> <p>In the course of the project, information was collected from questionnaires sent to IMPEL member countries and from the analysis of existing guidance documents. An expert workshop held in Frankfurt am Main (Germany) in September 2011 served as a forum of discussion between experts from environmental authorities, customs, police, industry and research institutions and produced input for the envisaged guidance tools. On the basis of this information, a “Waste Sites Manual” on the identification and control of storage and treatment facilities used for problematic waste exports was drafted and tested in site inspections which took place in September 2012 in some member countries. The Manual was finalized in November 2012.</p>	
Disclaimer: This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations.	

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1. Introduction

1.1 Background

The last years have seen an increase in problematic waste streams worldwide, notably exports of electronic waste, batteries, end-of-life vehicles and their components, but also mixed municipal waste, from the EU to Africa and Asia. Spot checks of waste shipments in transit ports and on motorways in the EU can often do no more than uncover the tip of an iceberg. This situation has prompted waste shipment experts to think more about targeting the sources of illegal waste streams and the “upstream” facilities where such waste is collected, stored and/or treated before its export from the EU. The High Level Inspectors meeting of 28 April 2009, for instance, agreed on the need to look “upstream” to recycling and other waste treatment facilities which should be inspected in view of the poor quality of some waste going for export. The draft Action Plan of the European Commission presented at this meeting included upstream controls as one of the elements in the fight against illegal waste shipments and called for guidance on how integrated controls at the various stages of generation, collection and shipment of waste could best take place in order to ensure a consistent and uniform approach. Also the National Contact Points (NCPs) of IMPEL-TFS, at their Exchange Days meeting of September 2009, supported inspections of waste sites with regard to waste shipments as one of the favourite future projects. Based on a proposal from Germany, terms of reference were therefore drawn up for a project on “Waste Sites” and adopted by the IMPEL General Assembly in November 2010. An updated ToR was approved by the General Assembly in November 2011 for the second year of the project (see **Annex 1** to this Report).

1.2 Objectives and structure of the project

Under the terms of reference the project aimed to identify good practices and develop a practical guidance tool for the inspection of “upstream” waste sites, and for the promotion of compliance with waste law on these sites, by competent authorities in the IMPEL member countries. More specific objectives were:

- To get a better understanding of problematic waste streams (especially WEEE, ELVs and their components, plastic waste and a few others) and the role of upstream waste sites in them,
- To exchange best practices concerning such waste sites,
- To elaborate guidance on site identification, inspection and follow-up, in the form of a handbook and a field guide on inspections (later merged into a single “Manual”),
- To improve collaboration between relevant agencies (environmental licensing and inspection, police, customs and others) at national and international level.

In order to focus on the most problematic facilities in the context of illegal waste exports, and to avoid duplication of work with regard to other IMPEL projects, it was decided to target especially storage and dismantling sites for waste electrical and electronic equipment (WEEE) and end-of-life vehicles (ELVs), plus - to some extent – material recycling facilities for mixed waste. In the course of the project also

storage sites for lead-acid batteries (LAB) and car parts turned out to be “hotspots” for the preparation of illegal traffic.

Led by Germany (the *Regierungspräsidium Darmstadt* as a regional waste authority), the project team included also regulators from Latvia, the Netherlands, Slovenia, Sweden and the United Kingdom.

The project started in January 2011 with a questionnaire sent to IMPEL members which asked the addressees about the main waste types in illegal exports, the number of waste sites involved, licensing requirements for such facilities, the frequency of inspections, possible certification and audit systems, existing guidance tools at national level and the desired guidance to come out of the Waste Sites project (see **Annex 2** to this Report). Altogether 12 replies were received from administrations in 10 member countries.

In a next step, the project team looked systematically at existing guidance documents at national and international level. Altogether 33 relevant documents – including 7 IMPEL reports, 3 studies for the European Commission, 3 twinning project reports and 15 national guidelines – were assessed at this stage and briefly described in so-called “guidance document fact sheets” (see **Annex 3**).

The fact sheets as well as summaries of the existing guidance and of the questionnaire survey were made available for project participants on a special section of “Basecamp”, the protected website of IMPEL-TFS.

Against this background, an expert workshop was held in Frankfurt am Main, Germany, from 26-27 September 2011 in order to exchange information and best practices on identification, inspection and compliance measures regarding upstream waste sites that are relevant for illegal waste exports. The workshop was meant as a forum for discussion and attended by 33 experts from environmental authorities, customs, police, industry and research institutions.

This workshop as well as the preceding research provided input for the envisaged guidance tools. Eventually the project team decided to draft a single document (“Waste Sites Manual”) which was disseminated in a draft version to IMPEL members in August 2012, in order to be checked for practical usefulness and tested in site inspections by competent authorities in the member countries. Feedback was provided by way of questionnaires (see **Annex 5**). The revised Waste Sites Manual was finalized in November 2012.

The project team had altogether five meetings, of which three took place in Frankfurt (9-10 March 2011, 26 and 28 September 2011), one in Liverpool (31 May – 1st June 2012, back-to-back with the IMPEL-TFS Conference) and one in Stockholm (10-11 October 2012). In addition, a telephone conference was held on 16 February 2012. The actual project costs amounted to approximately 17,000 € over two years, including about 6,000 € for the year 2012. The meeting reports as well as the frequently updated work plan for the project were distributed to the project team and posted on IMPEL-TFS Basecamp.

1.3 Participants

The project team of “Waste Sites” consisted of officials from six IMPEL member countries: Germany as lead country, Latvia, the Netherlands, Slovenia, Sweden and the United Kingdom. Thomas Ormond from the regional administration of South Hesse (Germany) acted as project manager. The other members were (in alphabetical order): Lilija Dukalska (LV), Kirsten Göbel (DE), Pär Kollberg (SE), Mattias Lindgren (SE), Bojan Počkar (SI), Barry Sheppard (UK) and Piet ten Brink (NL).

Altogether 13 administrations from 11 countries participated in the project by answering the questionnaire in 2011. The 5 countries beyond the project team countries were Austria, Belgium, the Czech Republic, Portugal and Norway. Belgium and the UK participated each with two regional administrations (BE: Flanders and Brussels; UK: England/Wales and Scotland). The test inspection questionnaire in 2012 was filled in also by Finland.

The expert workshop in Frankfurt (September 2011) was attended by 33 participants from 12 EU Member States and Norway, mostly officials of environmental authorities but also representatives of the police, customs, industry and the European Commission’s Joint Research Centre. A list of participants is attached to the Workshop Report which is available via the IMPEL-TFS Basecamp website.

2. Answers to the questionnaire on waste sites (February/March 2011)

Answers to the questionnaire were received from 12 participating authorities in 10 countries: Austria (AT), Belgium / Flanders (BE-FL) and Brussels (BE-BCR), Czech Republic (CZ), Germany / Hessen (DE), Latvia (LV), Netherlands (NL), Portugal (PT), Slovenia (SI), Sweden (SE), United Kingdom / Scotland (UK-SC) and England+Wales (UK-EN-WA). The following sections are based on summaries compiled by Bojan Počkar (SI) and Mattias Lindgren (SE).

2.1 Problematic waste streams

AUSTRIA identified end-of-life vehicles (ELVs) as the most problematic waste stream in the years 2008-2011 with altogether 20 illegal shipments, of which 15 were out of Austria. Mixed plastic-paper waste and shredder “fluff” followed with 13 illegal shipments to other countries, WEEE and lead accumulators with 6 each, and demolition waste plus excavated soil with 4 outbound shipments between 2008 and 2011.

BELGIUM (FLEMISH REGION) pointed to its report to the European Commission under the Waste Shipment Regulation. The main problems were seen in badly sorted plastic waste, metal scrap with illegal recycling destinations, polluted e-scrap (e.g. consignments of compressors exported to Pakistan), and a great quantity of dubious WEEE shipments to Africa. ELVs were not targeted by inspections in this period of time. **BELGIUM (BRUSSELS CAPITAL REGION)** mentioned WEEE and ELVs as problematic waste types in the context of illegal exports.

The **CZECH REPUBLIC** reported to be usually a country of destination for illegal shipments, such as ELVs (from NL, BE, DE, IT, FR and others) and partly sorted plastic waste from Germany and Austria. From CZ were transported metal scrap (to PL and SK) and plastic waste in violation of the Waste Shipment Regulation.

GERMANY complained about illegal shipments of WEEE, ELVs and tyres.

LATVIA regarded as problematic waste flows into the country mostly spent lead batteries and waste tyres. Illegally exported were WEEE, chemical waste and oil products.

The **NETHERLANDS** focused on WEEE and plastic wastes as “priority waste streams” in the past three years. Recently also waste oil and its derivatives have attracted attention.

PORTUGAL identified mostly plastics, fridge compressors and ELV parts as most problematic waste types in exit movements. In entry movements ELV figure most prominently, often from France and other Northern European countries where Portuguese migrant workers live. At the time of reporting there were no conspicuous e-waste exports to Africa or Asia, and the formerly sizeable ELV export had been curbed (partly diverted to Spanish ports) by tighter customs controls and a mandatory car import certification scheme in Angola.

SLOVENIA registered illegal exports of lead-acid batteries, aluminium and other metal wastes, waste tyres and non-listed waste. Shipped to Slovenia illegally were construction and demolition waste (including excavated soil) and wood waste.

SWEDEN saw WEEE, ELVs and lead-acid batteries as particularly problematic. Illegal WEEE shipments are organized generally by small export companies and private persons who acquire the material mostly from real estate companies, second-hand dealers, electronic and white goods stores. Car dismantling facilities are often the source for illegal ELV exports. Official storage and collection points for WEEE are vulnerable for theft.

Both **UK** administrations (**ENGLAND + WALES** and **SCOTLAND**, respectively) regarded WEEE, tyres and mixed household waste or dry recyclables as main problem groups.

2.2 Waste sites involved in illegal shipments

With regard to the question how many waste sites were involved in illegal waste shipments since 2008, the data contained in the table below were given by the participating authorities. The figures can of course only reflect the cases that the authorities know about and some of them, due to limited jurisdiction, do not cover the whole national territory. It is also important to realize that only a fraction of illegal waste exports will ever be detected and it is not possible for any authority to know every site where the waste has passed through prior to being illegally exported.

From the data it appears that in most countries production facilities (such as factories) play only a secondary or marginal role as sources of illegal traffic, whereas general sorting and recycling facilities for waste are one of the main problem categories (ranking first in Austria, Czech Republic, the Netherlands, Sweden, Flanders and Portugal). The second key problem group as waste sites are storage and collection points, especially for WEEE.

	AT	CZ	LV	NL	SI	SE	UK-SC	BE-FL	DE	PT	UK EN-WA	BE – BCR*
a. Production facilities (factories etc)	11	5	1	10+		2	2	ca.10	1	60	0	
b. General sorting and recycling facilities	30	20	1	25+		6	7	30-40	2	69	5	
c. Dismantling facilities for ELV						2	1	1	5	43	3	
d. Dismantling facilities for WEEE	1	2					2	ca. 5		6	3	
e. Storage and collection points for ELV				5-			1	ca. 5			5	
f. Storage and collection points for WEEE	3	5	1	- /10+*			12	10-20	10		10	
g. Other storage facilities						1	2	ca. 20	3	4	14	
h. Others (which?)	25*				6* 4*		2		6	55*		

Notes (*):

AT: 25* - without license for storage, collection and dismantling of e.g. ELV.

NL: -/10+* - formal collection points, no illegal export. Informal collectors, various cases of illegal export.

SI: 6* - collectors of waste; 4* - Roma settlements.

PT: 55* - Individual: 1; Transport: 3; Trader: 14; unknown: 3

BE-BCR: Between 2008 and early 2011, 137 official reports were written by local and regional authorities directly linked to infringements on treatment of waste, storage of waste, traceability of waste or export of waste.

2.3 Permit requirements

In **AUSTRIA** all of the above-mentioned waste management facilities need a license under national law.

BELGIUM / FLEMISH REGION: An environmental permit is needed for the storage, sorting and recycling of waste, with one exception: The temporary storage and dismantling, cleaving, cutting, pressing and / or cutting of waste at the place of production prior to each collection, is not subject to a license if the storage and mechanical handling is done in relation to an organized evacuation of waste (although such a facility might need an environmental license for other activities).

BELGIUM / BRUSSELS REGION: An environmental permit is needed for the facilities mentioned in the table above under lit. a)-d) and for g). In general, these permits are delivered by the regional authority. An environmental permit is needed for facilities under lit. e) when storing 3 or more ELV's and for facilities f) when storing 1000 kg or more WEEEs. Permits for facilities under lit. e) and f) can be delivered by local and regional authorities depending on the classification of the installations.

CZECH REPUBLIC: Every facility for waste recovery, disposal, collection or purchase may operate only on the basis of a decision by the regional authority granting consent and imposing rules of operation. There are more than 15,000 facilities for collection or purchase of waste in the Czech Republic.

GERMANY: Basically, production facilities and bigger storage and dismantling facilities for waste need a license under the Federal Emission Control Act (*BImSchG*). The minimum storage capacity in this context is usually 30 t of hazardous waste or 100 t of non-hazardous waste; for scrap/ELVs the licensing requirement is coupled to a storage area of 1,000 m² or more. The minimum level for treatment facilities is a throughput performance of 1 t/h for hazardous waste and 10 t/h for other waste; for ELVs it is 5 cars per week. Facilities where long-term storage (> 1 year) takes place require a *BImSchG* license regardless of capacity. Facilities below the minimum thresholds may need a building permit if they involve the construction or conversion of a house.

In **LATVIA** all facilities or enterprises that carry out any polluting activity need an environmental permit issued by the State Environmental Service. The type of permit depends on the type and capacity of the facility. Category A covers IPPC installations (e.g. landfills), category B is meant for medium size facilities (e.g. temporary storage places for hazardous waste, treatment facilities of wastes containing oil products, ELV dismantling facilities, sorting places of household waste etc.), category C for very small facilities but not for waste sites. Apart from this, there are specific waste management permits for transportation, collection and temporary storage.

In the **NETHERLANDS** all waste sites operate under an "environmental licence" issued at provincial level.

PORTUGAL: Industrial production facilities need a specific license. Similarly, facilities for waste management require a license from the Ministry of the Environment. Storage facilities and product warehouses do not need a permit as long as they do not store waste (R13 operation).

In **SLOVENIA** all facilities for waste management (recycling or disposal facilities, collectors, brokers, dealers, carriers, etc.) need a license issued by the Environmental Agency.

SWEDEN: Major production, sorting and recycling facilities generally need a permit. Smaller facilities normally have to notify their activities to the local enforcement authority (the municipality). Only very small facilities dealing with waste are exempted also from this obligation.

UK / SCOTLAND: All sites require some form of licence or permit. Sites in categories a, b, c and d will require either a Waste Management Licence (WML) or a Pollution Prevention & Control (PPC) Permit, depending on the nature of their activities and emissions to land, air and water. Sites that simply store waste (all other categories) are exempt from Waste Management Licensing, but are still required to register their exemption status. This means that these sites are still on SEPA's radar and would still receive occasional inspections (SEPA = Scottish Environmental Protection Agency).

UK / ENGLAND AND WALES: All sites handling waste require some sort of permit or waste management licence. However, those sites that undertake simple or low risk waste activities with relatively small quantities of waste may register an exemption. These sites are inspected less frequently and not at set time intervals.

2.4 Inspection practice

Asked how often the licensed facilities among the waste sites in question were inspected, half of the participants (AT, BE/FL and BCR, CZ, DE, PT) replied that inspections were carried out once every 2-5 years. Latvia, the Netherlands and Sweden indicated an annual or even more frequent rhythm of inspections. The participants from Slovenia and the UK answered the question in the sense of “regularly” but also pointed to the importance of risk assessment: Larger sites or those having a history of non-compliance would receive more regular inspections (even once a month), whereas “low risk” sites would not be visited so frequently. Scotland mentioned also specific requirements, e.g. for small WEEE treatment centres to be visited at least once a year to check them on compliance with the WEEE Directive.

In Portugal the objective is to inspect waste sites at least once every three years which means that some are inspected every year and others only once every five or six years. In Belgium (Brussels region) there exist differences between facilities with a permit from the regional authority (for storage, sorting, treatment of waste) which are inspected once every 2-5 years while the inspection frequency for the smaller facilities with a local authority permit depends on the available resources of the local authority.

By contrast, on the question how often the *non-licensed* facilities were inspected, nearly all participants – with the exception of Sweden and Portugal - answered that this happened only on special occasions. This is probably linked to the fact that in most countries “non-licensed” is associated with such a low risk that inspections would be seen normally as unnecessary. In other countries where the term is tantamount to “illegal”, an inspection would naturally take place only after the detection of the site and with the aim of closing it down immediately or bringing it quickly into compliance with the licensing regime.

2.5 Non-governmental certification and audit systems

Environmental management systems like ISO 9001/14001 and EMAS are known in most of the “old” EU Member States but are applied on a purely voluntary basis. The Czech, Latvian and Slovenian participants did not know of any such cases. The authorities in general did not possess information on the extent to which these systems were used in the industry. Only Sweden mentioned that ISO 14001 and EMAS are often used especially by larger companies.

In the Netherlands, professional associations are in place in most waste sectors but there is a big variety in the level of formality of these membership / certification / audit systems. The most serious one is the system of the Association of car dismantlers (ARN) which covers more than 95 % of the ELV dismantling sites and whose members must meet rigid criteria. Other business associations, such as the one for metal recyclers (MRF), do not have a very serious quality system in place. Due to the voluntary nature of the audit systems, they cannot replace regular governmental inspections.

In Germany exists a voluntary system for the certification and audit of so-called expert waste management companies (“*Entsorgungsfachbetriebe*”) whose qualifications are defined by law. The added value of this system, however, is quite controversial as it has not prevented some certified businesses from being involved in illegal operations.

2.6 Existing guidance tools

AUSTRIA: The Federal Ministry for Agriculture, Forestry, Environment and Water Management worked out a general checklist on performing inspections at wastesites together with experts for site inspections

of the 9 Austrian provinces. Some of the provinces adapted this general checklist to their special requirements.

BELGIUM / FLANDERS mentions the following guidance documents:

- Checklist for the inspection of waste sorting/recycling facilities (A634), aiming at traceability with a short reference to the WSR;
- Guidance tools for the inspection of facilities for the recycling of metal scrap (P640), mainly aiming at a correct depollution of WEEE (in particular PCBs), without specific reference to the WSR;
- Check list for inspection of facilities for storage and recycling of building rubble – no specific reference to the WSR.

BELGIUM / BRUSSELS: No, only general procedures.

CZECH REPUBLIC: The Czech Environmental Inspectorate (CEI) performs the inspections on the basis of a common guideline (under the direction of Headquarters of CEI). There are also guidelines designed for regional authorities (under the direction of Ministry of Environment, MoE).

GERMANY: In the State of Hesse, there exists a collection of administrative guidelines for the implementation of waste management law (*“Vollzugshandbuch Abfallwirtschaft”*). Notable guidance papers in this context concern the regular inspection of major waste producers and of licensed waste management facilities (*“Leitfaden Betriebsprüfung”*) and the shutdown of illegal facilities (*“Vollzugshilfe zur Stilllegung und Beseitigung illegaler Abfallentsorgungsanlagen”*).

LATVIA: No.

NETHERLANDS: Guidance tools exist on two levels:

- Provincial level. Here lies the responsibility for regular inspections. The 12 Dutch provinces have so called ‘sector plans’ in place. In each sector plan, for example for ELVs, a clear description of the sector is given, risk assessments are made and sometimes the plans include reporting formats.

- National level. The VROM Inspectorate – now ILT - operates as inspectorate for specific topics, such as the WSR. For WSR inspections there is a guidance tool for three kinds of inspection visits:

- *Ad hoc inspection* – following the detection of a suspected waste shipment, usually on the same day or soon after
- *Regular WSR inspection visit* - focusing on the activities in the waste site, related to the import or export of waste. These visits may be planned jointly with the Provincial authorities and/or may be part of a so called ‘Priority Waste Stream project’.
- *In depth WSR inspection visit* – often taking administrative procedures and historical data into account. Thorough analysis of working methods, mass balances, trade partners etc. etc. This visit is often the result of a site being selected as ‘risk site’. The selection methods used has not always proven to be reliable.

PORTUGAL: There are no guidance tools for inspection, due to a lack of human resources for drafting and updating them, and also because the remaining inspectors (their numbers are dwindling) are experienced and do not see a need for them.

SLOVENIA: No.

SWEDEN: There are a lot of guidance tools for inspection and law enforcement concerning waste sites. These are normally produced by the County administration boards or the municipalities which are the major enforcement authorities on environmental law in Sweden. These guidance tools are however not targeted for inspections concerning TFS.

There is one general check list for inspection of waste sites and production facilities concerning TFS. Swedish authorities now see a need to use tools targeted for specific and problematic waste streams such as WEEE and ELVs.

UK / SCOTLAND, ENGLAND + WALES: The UK Agencies (Environment Agency, SEPA, Northern Ireland Environment Agency) often work together to produce ad-hoc guidance documents when required, for example inspection criteria for export of used electrical goods, and tyres. For routine inspection of licensed/permitted waste sites they operate with standard inspection forms and checklists, plus internal

risk assessments. Permitted facilities are scored and given a performance band rating. In addition, the Environment Agency of England and Wales is developing a waste stream approach (initially for material recycling facilities – MRF - and WEEE wastes) to map waste flows as they move from producer to final treatment or disposal.

Scotland (SEPA) has its own internal Enforcement Support Team for general support across all sites that are in breach of relevant legislation and that are suspected of committing environmental crime. Many of the officers within this team have a background in law enforcement and are in a good position to provide guidance on how to deal with problematic sites.

2.7 Useful additions and expectations towards the project

As a final question, participants were asked which type of guidance tool they would see as particularly useful among the following list, and which of these should be taken up by the Waste Sites project:

1. Guidance for identifying problematic waste sites,
2. Criteria for prioritisation of waste sites (assessment),
3. Criteria for distinguishing wastes and non-wastes,
4. Guidance on minimum environmental standards for waste sites, especially interim storage and treatment facilities,
5. Model inspection plan,
6. Checklist for inspection of waste sites,
7. Guidance on effective law enforcement (closing down / bringing waste sites in compliance),
8. Others (which?)

On a scale of 1 to 5 (1 = very useful, 5 = not useful at all), the guidance tool types no. 1, 3 and 6 gained top scores of 10, 9 and 8 votes in the categories 1 and 2, “very useful” and “useful”. This meant that guidance for the identification of problem waste sites and a checklist for the inspection of such sites were given high priority by the participating regulators. The third top issue - criteria how to distinguish waste from non-waste – was confirmed to be very relevant in practice, even though the project team made it clear that this task was very complex and overlapping with several other IMPEL projects and so might be beyond the scope of this particular project. Nevertheless it was decided to take into account the urgent needs of inspectors in the field as far as possible and reasonable in the envisaged guidance document.

3. Research on existing guidance documents (May-August 2011)

The project team decided in March 2011 to research and evaluate existing guidance documents for inspections, in so far as relevant, in order to determine whether their contents could be used for the guidance paper that should come out of the Waste Sites project, and where possibly a reference to those existing documents would be sufficient for the purpose. Until August 2011, 33 guidance documents on national and international level (including IMPEL materials) were scrutinized by members of the project team. Notice was also taken of guidance materials in Norway and Switzerland on the distinction of waste and non-waste.

The 33 assessed documents, mostly non-binding and drafted between 2001 and 2011, fell into the following categories:

- 7 IMPEL documents (project reports and “Waste(s) Watch”),
- 4 EU documents (RMCEI = Recommendation on Minimum Criteria for Environmental Inspections, plus 3 studies for the European Commission),
- 4 international guidance documents of INECE, Interpol and the World Customs Organization,
- 3 manuals or reports of twinning projects within the EU,
- 15 national guidance documents from Austria, Germany, the Netherlands, Sweden and the UK.

To facilitate the evaluation of these documents a standardized fact sheet was developed to summarize the content and other essential data of each document and which should contain a brief assessment of its usefulness for the Waste Sites project. The template and a list of the completed fact sheets can be found in **Annexes 3 and 4** to this Report. The individual fact sheets as well as a compiling summary of 29 fact sheets (by Mattias Lindgren) were made available on IMPEL-TFS Basecamp.

The essential result of this research was that there exists quite a considerable body of guidance for the checking of waste shipments or waste transports, on the one hand, and for the inspection of permitted industrial or waste management facilities, on the other. Several IMPEL-TFS reports and other documents also address to some extent the issue of “company inspections”, thus targeting waste management facilities at the origin or at the destination of a waste shipment. However, there seems to be a gap as regards the control of smaller, possibly illegal or at least non-licensed collection and storage facilities which are involved especially in the illegal export of WEEE, end-of-life vehicles, car parts and batteries. The inspection of such waste sites poses specific challenges, and already their detection or identification may be a problem. The evaluation of available guidance tools thus confirmed the necessity to develop more specific advice on dealing with waste sites, as envisaged in this project.

Some more guidance on inspection of waste shipments and facilities has been elaborated recently in other projects that were ongoing in parallel to the Waste Sites project. The “Doing the right things in waste shipment inspections” (DTRT-TFS) guidance book, for example, which was finalized in summer 2012, focuses on the right planning of inspections. Reference to this and other recent IMPEL work is made in the Waste Sites Manual.

4. Expert workshop in Frankfurt am Main (September 2011)

4.1 Participants and issues of discussion

In the context of the Waste Sites project an expert workshop was held in Frankfurt am Main, Germany, from 26 to 27 September 2011. The meeting was organized by the project manager and the *Regierungspräsidium Darmstadt* (regional authority for South Hesse). 33 experts from 12 EU Member States and Norway participated, mostly officials of environmental authorities but also public prosecutors, police and customs officers, as well as representatives of the recycling industry, the BiPRO consulting company and the European Commission's Joint Research Centre in Ispra.

The purpose of the workshop was to exchange information and best practices on identification, inspection and compliance measures regarding upstream waste sites that are relevant for illegal waste exports, and by this to give input to the guidance tools that were to be developed in the course of the project.

The first of the three half-day sessions provided an introduction to the problem, also in historical and economic perspective, and focused on the role of upstream waste sites in illegal exporting and particularly in the shipment of electronic waste. The second session offered a forum for non-environmental authorities like police and customs to give an analysis from their perspective, and to link the discussion to ongoing research work launched by the European Commission and to possible synergies with the EU geo-information system INSPIRE. Two sub-groups then discussed in more detail the two most problematic waste streams, e-waste on the one hand and end-of-life vehicles and car batteries on the other. The third and last session on the afternoon of 27 September concentrated on best-practice examples from various European countries (especially the Netherlands, the UK and Sweden) and led to a final discussion in which joint conclusions and recommendations were adopted.

The workshop highlighted the similarity of the problems that the authorities in many EU countries have to face, resulting in similar proposals for further action. Smaller and "informal" storage and collection points for e-waste, ELVs and their components were identified as the key waste sites from which illegal shipments are started. Participants of the workshop agreed on the importance of information exchange between authorities and a good understanding of the international waste trade, but also on the necessity to address traders and site operators in the right way and to set clear standards for them. Besides, a better international cooperation was seen as indispensable in order to control and reduce illegal waste shipments. As concerns e-waste in particular, the participants concluded that it is important to inform the public, put pressure on take-back organizations and make the return of the waste to high-standard recyclers more attractive.

4.2 Conclusions and recommendations

On 27 September 2011, the workshop participants adopted the following conclusions and recommendations:

- Communication and information between authorities, including multi-agency access to information, are crucial for effective work in the field of waste sites.
- A “waste chain approach” and economic understanding of the markets are also essential.
- In order to ensure effective cooperation with authorities in other countries and with police and customs, it is advisable to contact the highest level first and convince the top management of the importance of joint action. Concerning the police, it is useful to point to the aspect of collateral (non-environmental) crime present on waste sites.
- In the context of e-waste streams and African container sites advice is needed on how to address the actors. In order to change behaviour, it is necessary to understand the background of these actors and to build up trust with those who act in good faith.
- When inspecting a site one should know what records to check and be more object-oriented.
- The distinction of waste and non-waste is of major importance. Guidance developed in the project should include relevant definitions, pictures, criteria and examples.
- In dealing with traders and site operators the waste authority should not be afraid to set standards for waste sites as long as they are clear. Correspondents’ Guidelines for WEEE and ELVs should be applied.
- In order to “dry up the sources” of illegal waste streams, it is important to inform the public, put pressure on take-back organizations and make the return especially of e-waste more attractive. Authorities should talk to retailers on the right level.
- Connect your local action with a global perspective!

5. IMPEL and INSPIRE

As part of the presentations at the Waste Sites workshop in Frankfurt, Mr. **Angel Lopez Alos** of the European Commission's Joint Research Centre in Ispra (Italy) addressed the new European geo-information system INSPIRE and possible connections to IMPEL under the title "INSPIRE and the IMPEL Waste Sites Project: Synergies and Collaboration Proposals". Mr. Lopez invited IMPEL members to participate in the ongoing consultation on data specification rules and other open activities in the context of INSPIRE. He suggested possible uses of spatial data in relation to the detection and inspection of waste management facilities via network services and according to harmonized and inter-operable databases. In order to later profit from this exchange of information, it would be necessary for IMPEL experts to give input now on relevant data specifications (more information available under <http://inspire.jrc.ec.europa.eu>).

Following the presentation a discussion evolved about technical options for data exchange and the possible linking of waste shipment data and information about facilities of origin and destination. The speaker pointed out the nature of INSPIRE as a living system and the need for constant update. The main task of users would be to decide which information is important and must be shown. The system is not meant to create new information duties but rather to follow existing ones and connect the available data. The existing data protection laws in the Member States would have to be respected. Similarly, it must be distinguished between public and confidential information.

The discussion was continued at the project team meeting in Frankfurt on the next day. Mr Lopez explained the envisaged geo-information system in more detail and informed that waste management facilities would be included among the data relevant for the system, in principle irrespective of their size and legal status. However, each Thematic Working Group could define its own dataset, which was the purpose of the ongoing consultation to which all interested national bodies and IMPEL were invited to contribute.

As an example Angel Lopez mentioned that INSPIRE could provide the position of different facilities with links to their respective permits. It would also be interesting to get a geographically structured overview of the input and output of various waste management facilities. Project team members commented that it would be necessary to feed all waste shipment permits/notifications into the system and expressed some doubts that it would be feasible to include waste movement operations as they were very fluid, emphasizing the problem to keep such information up to date.

As another example of a possible dataset, Angel Lopez mentioned the plan to link "Flickr" photos of fires to geographical maps as a means to quickly alarm the authorities. A similar link might be conceivable for illegal waste dumps.

Concerning the responsibility for updating, Angel Lopez informed the group that there should be one provider for each Member State who collects all the required national information. That information would be hosted on national servers. The EU Commission would ensure that a standard format is kept which would make data inter-operable. English was expected to be the main language but use would also be made of glossaries.

In the aftermath of the meeting, the Waste Sites project team registered as a Spatial Data Interest Community (SDIC) and participated in the internet consultation on the implementation of the INSPIRE Regulation (especially Annexes II and III and the Data Specification Guidelines) by posting a comment on the consultation website in October 2011. The project team recommended that for purposes of effective waste shipment control the list of data under INSPIRE should be extended to include information from notification procedures under Regulation (EC) No. 1013/2006 and other datasets relating to waste streams. As regards data on waste management facilities, INSPIRE should make available especially R-codes of permitted activities, waste codes that the facility is allowed to accept, store and/or process, the permitted storage or annual processing capacity for each waste, the realized annual waste mass balance in retrospect, the permits issued for notified waste shipments in which the facility was involved as notifier, waste generator or destination, as well as data on legal entity, ownership, annual turnover, number of employees and the enforcement history. These data on waste shipments and the facilities of origin and destination would help authorities get an overview of waste streams and identify major "leakages" and risks for illegal waste shipments.

6. Work on the Waste Sites Manual (January-November 2012)

6.1 Evolution and changes in the guidance document

Whereas the structure and contents of the envisaged guidance document(s) were discussed already since spring 2011, serious drafting started only in early 2012. Originally, the project team had planned to elaborate a “Handbook” and a shorter “Field Guide” for use during inspections. A stringent separation of the two documents, however, proved to be difficult to achieve. In view of this problem and the limited time and resources, the project team therefore decided at its meeting in May 2012 to merge the envisaged guidance tools into one “Manual” which should not be as extensive as the originally intended Handbook. It was then also agreed to mark those checklists and other contents of the Manual that might be used by inspectors in the field. The drafting of the Manual was finalized in early November 2012.

The work on the guidance document was divided among the project team members. The core part (Chapter 3.1-3.5 on the preparation and execution of site inspections) and the section on the Waste Stream Approach (ch. 2.2) were drafted by Piet ten Brink (NL) and Barry Sheppard (UK). Bojan Počkar (SI) and Mattias Lindgren (SE) covered the section on safety aspects (ch. 3.6) and most annexes. Pär Kollberg (SE) wrote the section (3.4) and the annex on distinguishing waste from non-waste, Kirsten Göbel (DE) the section on information sources (ch. 2.1) and Lilija Dukalska (LV) on cooperation with other authorities (ch. 1.4.3). Other sections of the Manual - especially the greater part of the introduction - were drafted, and the complete text edited, by Thomas Ormond (DE).

6.2 Test inspections and feedback

A first draft of the Waste Sites Manual was disseminated in late August 2012 via Basecamp to the IMPEL contacts who had registered on the project site of Basecamp, and to other potential participants in test inspections. Together with the Manual a two-page document with a set of explanations (test instructions) and a questionnaire was distributed to the addressees (see **Annex 5** to this Report), in order to collect feedback from the test inspections which were supposed to take place in September 2012, as well as comments on the draft Manual.

Due to the limited timeframe, only four questionnaires were returned from Finland, Slovenia and two agencies in Germany. Further comments were received from a regional authority in the Netherlands. Some others had shown interest but did not feel able to organize the requested test inspections in September. Among the participants, the inspection activity was most extensive in Slovenia, with 15 sites controlled over 10 days (7 collection points, 3 storage and 5 treatment facilities; 7 with permit, 8 without; 8 for ELVs, 1 for batteries, 1 for spent catalysts, 2 for plastic packaging, 2 for metal scrap, 1 for others). The purpose of the site visits was mostly fact-finding and information of operators, but also in one case each an order of technical improvements, a prohibition of shipment and an order of clean-up were issued, as well as four administrative fines and one reporting to the police.

In Finland, 3 treatment facilities for ELVs and WEEE were checked in the course of the test inspections, in Germany altogether 15 real or suspected storage sites for WEEE, tyres and other wastes. In all these cases the inspectors limited themselves to fact-finding and giving information or warnings to operators.

The comments on the draft Manual in this context were altogether positive. The participating agencies could make use of the guidance for the preparation and execution of the inspection (not yet for the follow-up) and found it mostly “sometimes” useful. This referred particularly to the chapters on proactive measures and the waste stream approach, as well as to the annexed checklists for inspections and tables for procedural requirements. Participants advised that the paperwork (planning, reporting) related to inspections should not be too heavy. Some additions to the Manual were suggested, such as information on the distinction between used and waste tyres and on the identification of CFC-containing refrigerants.

6.3 Results and necessity of follow-up

Feedback from project participants suggests that, while the envisaged Manual can be a helpful tool for inspectors and regulators, the main part of the work is still to come. Various comments have expressed the need for a practical follow-up focusing on the application of the Manual rather than on further elaborating the methodology. Ideally, the exercising and dissemination of best practices with regard to waste site identification, inspection and compliance management should be connected with exchanges of inspectors and an element of “twinning”. The practical usability of the Manual could also be greatly enhanced by its translation from English into other languages of potential inspection countries, e.g. German and Swedish.

Apart from this, discussions within the project team and with other IMPEL experts pointed to the importance of learning from the positive experiences made especially in the UK and the Netherlands with intelligence-led research and the “waste stream” or “waste flow” approach on the one hand, and with proactive strategies (e.g. media campaigns, communication with business associations, traders and shipping lines) on the other. Comments from project participants support a focus on these two thematic elements in a possible follow-up project.

Annex 1: Terms of reference (update 2012)

TERMS OF REFERENCE FOR IMPEL PROJECT

No	Name of project
2012/18	<i>Waste Sites (phase 2)</i>

1. Scope

1.1. Background	<ul style="list-style-type: none"> • Under Article 34(1) of Directive 2008/98/EC on waste, establishments or undertakings which carry out waste treatment operations, establishments or undertakings which collect or transport waste on a professional basis, brokers and dealers, and establishments or undertakings which produce hazardous waste shall be subject to appropriate periodic inspections by the competent authorities. • Recent discussions in IMPEL-TFS and among high-level inspectors have addressed, among other things, the necessity to focus on “waste sites” in Europe in connection with illegal waste exports. The High Level Inspectors meeting of 28 April 2009, for instance, agreed on the need to look “upstream” to recycling and other waste treatment facilities which should be inspected in view of the poor quality of some waste going for export. The draft Action Plan of the European Commission presented at this meeting included upstream controls as one of the elements in the fight against illegal waste shipments and called for guidance on how integrated controls at the various stages of generation, collection and shipment of waste could best take place in order to ensure a consistent and uniform approach. • At the IMPEL-TFS NCP Exchange Days meeting of September 2009, inspections of waste sites with regard to waste shipments was mentioned as one of the favourite future projects. • The IMPEL-TFS Steering Committee in its meetings of October 2009 and February 2010 agreed to propose a new project “Inspections of waste sites with regard to waste shipments” as a high priority for 2011. Germany declared its readiness to act as lead country. • The IMPEL-TFS Conference of June 2010 discussed the “Waste Sites” project in a workshop and included it on its list of projects for the coming years.
1.2. Link to MAWP and IMPEL’s role and scope	The project “Inspection of waste sites” is anticipated in the draft IMPEL TFS Cluster MAWP 2011-2015 (p. 20) with a view to be started in 2011. It should help in the future IMPEL effort (cf. MAWP, p. 9) to identify and develop good practices, produce guidance, tools and common standards and actively contribute to further improvements as regards inspection and enforcement of EU law especially with regard to the waste management facilities involved in exports of waste.
1.3. Objective (s)	To identify good practices and develop a practical guidance tool for the inspection of “upstream” waste sites, and for the promotion of compliance with waste law on these sites, by competent authorities in the IMPEL member countries.
1.4. Definition	<p>The objectives will be achieved by</p> <ul style="list-style-type: none"> • Distributing a short questionnaire to obtain more precise information on the problems associated with waste sites in the context of waste exports, and good practices to deal with them in the IMPEL member countries; • Discussing per e-mail (via Basecamp) and in a project group meeting the findings and determining the priorities and distri-

	<p>bution of tasks;</p> <ul style="list-style-type: none"> Organising a workshop in Frankfurt am Main (Germany) with participation of waste shipment and company inspectors (possibly also experts from customs, police, municipalities and industry) from various member countries to exchange information, experiences and ideas about detection, inspection and law enforcement regarding the waste sites in question (especially storage, collection and dismantling facilities for WEEE and ELVs and recycling and sorting facilities for mixed waste); Elaborating a range of guidance tools (see 1.5 below) for inspectors in IMPEL member countries by e-mail discussion and in further project team meetings; Testing the (draft) tools in inspections performed on waste sites by project team members and other participants who then report on their experiences.
1.5. Product(s)	<ul style="list-style-type: none"> A workshop preparing an interim report, A guideline for the identification of problematic waste sites, for their inspection and for measures to bring sites into compliance or closing them down. This includes checklists, a model inspection plan and a list of criteria for prioritisation, supplementing the guidance developed in the framework of the "Doing the Right Things" project. A final project report.

2. Structure of the project

2.1. Participants	Inspectors and other experts at authorities competent for waste site and waste shipment inspections in up to 12 IMPEL member countries, possibly customs and police officers.
2.2. Project team	The project team will consist of representatives from Germany, Sweden, the UK, Latvia, Slovenia and the Netherlands.
2.3. Manager Executor	Thomas Ormond (Regierungspräsidium Darmstadt, Germany)
2.4. Reporting arrangements	The progress of the project will be reported to the TFS Cluster (Steering Committee, NCPs, Secretariat), to the participants and other interested parties. The TFS Cluster will submit the report to the IMPEL General Assembly. - Interim report: autumn 2011, - Final report: autumn 2012.
2.5 Dissemination of results/main target groups	Via IMPEL and IMPEL-TFS website. IMPEL member countries and their competent authorities, European Commission

3. Resources required

3.1 Project costs and budget plan			2011	2012
			€	€
<i>1. Overhead (organisation) cost :</i>			500	500
<i>2 Project meeting costs:</i>			19000	5580
Project Team Meetings	No of meetings in 2011: 2	No of meetings in 2012: 2		
No of Participants covered in budget:	6 (+ 2 German p.)	6		
Travel:	2 * 6* 400 €	2 * 6 * 350 €	4800	4200
Accommodation:	2 * 6 * 100 €	2 * 6 * 90 €	1200	1080
Catering:	2 * 6 * 25 €	2 * 6 * 25 €	300	300
Meeting venue:				
Workshop				

	No of Participants covered in budget:	20		
	Travel: 20 * 400 €		8000	
	Accommodation: 20 * 2 * 100 €		4000	
	Catering: 20 * 2 * 25 €		1000	
	Meeting venue:		0	
	<i>3. Other costs:</i>			
	Consultant:			
	Translation:			
	Dissemination:			
	Other (specify):			
	TOTAL cost		19500	6080
3.2. Fin. from IMPEL budget	<i>2. Project meeting costs:</i>		19000	5580
3.3. Co-financing by MS (and any other)	<i>2. Project meeting costs</i> (possibly contribution by Germany (Land Hessen), subject to budget decisions in early 2011)			
3.4. Human from MS	Project team members	Project team meetings (preparation, participation and follow up)	8 days	8 days
		Workshop (preparation, participation and follow up)	12 days	
		Test inspection with report		2 days
	Other participants		4 days	2 days

4. Quality review mechanisms

Discussion with participants, (interim) reporting to the IMPEL TFS Steering Committee, the IMPEL-TFS Conference, NCPs meetings and IMPEL's General Assembly.

5. Legal base

5.1. Directive/Regulation/Decision	1) Regulation (EC) No. 1013/2006 on shipments of waste; 2) Directive 2008/98/EC on waste.
5.2. Article and description	ad 1) Art. 50 par. 2 and 5: inspection of establishments and undertakings; multi-lateral cooperation to facilitate the prevention and detection of illegal shipments; ad 2) Art. 34.1: inspections of waste management establishments and undertakings
5.3 Link to the 6th EAP	Articles 3(2) and 9(d) of the 6 th EAP call for, among other things, the encouragement of more effective implementation and enforcement of Community legislation on the environment through the promotion of improved standards of inspection, monitoring and enforcement by Member States and through improved exchange of information on best practice of implementation.

6. Project planning

6.1. Approval	IMPEL GA November 2010
(6.2. Fin. Contributions)	
6.3. Start	January 2011
6.4 Milestones	<ul style="list-style-type: none"> January 2011: Distribution of questionnaire February 2011: Feedback March 2011: First project team meeting; collection of materials, setting of priorities May 2011: Invitation to workshop September 2011: Workshop and second/third project team meeting in

	<p>Frankfurt a.M.</p> <ul style="list-style-type: none"> • November 2011: Workshop report • February 2012: Distribution of tasks for guidance tools • May 2012: First drafts of guidance tools Fourth project team meeting • June/September 2012: Test of guidance tools in site inspections • October 2012: Fifth project team meeting • November 2012: Final version of guidance tools, final report • December 2012: After IMPEL GA publication on website
6.5 Product	September 2011; December 2012
6.6 Adoption	Final report: December 2012

“Waste Sites” questionnaire

(31 January 2011)

1. **Which types of waste** do you regard as particularly problematic in illegal shipments to and especially from your country? Can you give data or point to information sources on illegal export of WEEE, end-of-life vehicles (ELV) and other wastes from your country?

2. **How many waste sites** – production, recycling or disposal facilities, storage and collection points etc. – in your country (or in the area for which you are responsible*) were involved in such illegal shipments since 2008?

**Please state which area/region:*

a. Production facilities (factories etc)		_____
b. General sorting and recycling facilities		_____
c. Dismantling facilities for ELV		_____
d. Dismantling facilities for WEEE		_____
e. Storage and collection points for ELV		_____
f. Storage and collection points for WEEE		_____
g. Other storage facilities		_____
h. Others (which?)		_____

3. Which of these facilities need a **license** (permit) under your national law?

4. **How often** are the **licensed** facilities **inspected**?

- Regularly annually or more often once every 2-5 years less often
 only on special occasions never

5. **How often** are the **non-licensed** facilities **inspected**?

- Regularly annually or more often once every 2-5 years less often
 only on special occasions never

6. Is there a **non-governmental certification and audit system** in place for such facilities?
7. Do you have in your country/region **guidance tools** on inspection and law enforcement concerning such waste sites? If so, please give details.
8. The “Waste Sites” project aims at providing, as far as necessary, guidance tools for the identification, inspection and law enforcement concerning relevant waste sites. Which tools would you see as particularly useful?

1 = very useful, 5 = not useful at all

No.	Type of guidance tool	1	2	3	4	5
T1	Guidance for identifying problematic waste sites					
T2	Criteria for prioritisation of waste sites (risk assessment)					
T3	Criteria for distinguishing wastes and non-wastes					
T4	Guidance on minimum environmental standards for waste sites, especially interim storage and treatment facilities					
T5	Model inspection plan					
T6	Check list for inspection of waste sites					
T7	Guidance on effective law enforcement (closing down / bringing waste sites in compliance)					
T8	Others (which?)					

Please name the three most useful tools in their order of importance:

1) _____ 2) _____ 3) _____

Annex 3: Template for guidance document fact sheet

Guidance document fact sheet

To summarize national or international guidance docs relevant for the “Waste Sites” project

(Info from: [name], [country], [date] 2011)

Title	
Member State / organization	
Type of document (e.g. binding or not?)	
Language(s)	
Date of publication/ elaboration	
Number of pages	
Scope of application (geographical / addressees)	
Internet link (if any)	
Issues covered	
Particularly useful items	
Other remarks	

Annex 4: List of guidance document fact sheets

IMPEL-TFS „Waste Sites“ project List of guidance document fact sheets (as of 4 August 2011)

IMPEL guidance documents

1. IMPEL reports Enforcement Actions _I_II
2. IMPEL manual Managing illegal shipments of waste 2008
3. IMPEL guidance book “Doing the right things” in inspections 2008
4. IMPEL report Risk assessment in inspection planning - Easy Tools 2010
5. IMPEL report Seaport II project 2005
6. IMPEL report Verification II project 2006
7. IMPEL Waste(s) Watch

EU guidance documents

1. Recommendation on minimum criteria for env. inspections 2001 (RMCEI)
2. ESWI/Commission study on services to support IMPEL 2009
3. IEEP etc./Commission study on WSR inspection requirements 2009
4. BiPRO/Commission study on implementation of waste legislation 2011

Other international guidance documents

1. INECE-SESN Inspection Guidance document
2. Police - AUGIAS manual 2010
3. WCO project Sky hole patching
4. WCO Report 2009 on Operation DEMETER

Twinning projects

1. AT-BG manual on waste control 2010
2. Twinning report BG-NL 2009
3. Twinning report Latvia-Italy

National guidance documents

1. AT Application notes on Annexes III-V of WSR
2. AT Checklist on performance of waste treatment facilities 2009
3. DE-LAGA GD on WSR 2009
4. DE UBA study on WEEE exports 2010
5. DE-LAGA GD on WEEE exports 2010
6. DE-Hessen GD for WM facility inspections
7. DE-Hessen GD for closure of illegal WM facilities
8. NL - VROM Inspectorate Work Instructions WSR 2011
9. SE checklist for waste shipments 2009
10. SE GD 2009 on EEE-WEEE
11. SE GD 2010 on export of used goods
12. SE GD EN 2010 for exporters of used goods
13. UK – English methodology for illegal waste shipments

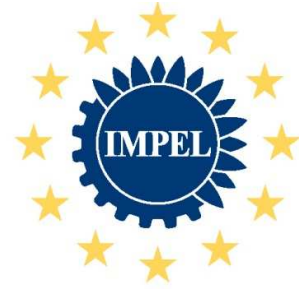
14. UK - Scottish GD loading of tyres
15. UK - Scottish GD on WEEE inspection

Abbreviations:

AT = Austria, BG = Bulgaria, DE = Germany, GD = guidance document, INECE = International Network for Environmental Compliance and Enforcement, LAGA = *Bund-/Länderarbeitsgemeinschaft Abfall* (German inter-state working group on waste), NL = the Netherlands, SE = Sweden, SESN = Seaport Environmental Security Network, UBA = *Umweltbundesamt* (German Federal Environmental Agency), UK = United Kingdom, VROM = *Ministerie van Volkshuisvesting, Ruimtelijke Ordening en Milieubeheer* (former Dutch Ministry of Environment), WCO = World Customs Organization, WEEE = Waste electrical and electronic equipment, WM = waste management, WSR = Waste Shipment Regulation,

BiPRO, ESWI, IEEP = names of consulting firms

AUGIAS, DEMETER = names of projects



European Union Network for
the Implementation and Enforcement
of Environmental Law

IMPEL-TFS Waste Sites Manual: Test instructions and questionnaire

(20 August 2012)

The „Waste Sites Manual“ is addressed to environmental inspection authorities and others who deal with facilities where waste is collected, stored or treated before an illegal export. The Manual is meant to give guidance on how to identify and inspect such sites and bring them into compliance with waste shipment rules and other environmental legislation. It was elaborated by a project team with participants from 6 countries and is based on the evaluation of existing international and national guidance, on responses by IMPEL members to a questionnaire, and on the results of an expert workshop which took place in Frankfurt am Main, Germany, in the year 2011.

Before finalising the document, interested inspection authorities in IMPEL member countries are requested to test the Manual in one or several of their inspections and provide their comments on the practical usefulness of the draft and possible ways to improve it. The following questions should serve to structure the information on the test inspections and the possible modifications to the draft Manual.

Please return the questionnaire by **30 September 2012** to the project manager of the Waste Sites project by e-mail (to: thomas.ormond@rpda.hessen.de) or via the Waste Sites project page of IMPEL-TFS Basecamp.

1. About you: **Expert and organisation**

Name						
Function						
Organisation						
Member State						
Contact details (email)						
Level of inspection authority (tick with „X“)	National		Regional		Local	

2. **Details of the test inspection(s)**

Time of inspection(s)		
Number of days		
Number of sites inspected (all)		of which (type of site):

Collection facilities		Storage facilities		Treatment / recycling facilities	
Number of sites with a permit			Number of sites without permit		

Main type of waste found on site (no. of sites with...):

WEEE		ELVs		Batteries		Mixed household waste	
Others (specify waste type + no of sites.)							

Results of the inspection (no. of sites – more than one answer possible):

Fact-finding / compliance assessment		Information/warning given to operator		Order of technical improvements	
Prohibition of waste shipment		Closure of site (complete or partial)		Order of clean-up + transport of wastes to other facility	
Administrative fine / penalty		Reporting to police, criminal prosecution		Withdrawal of permit	
Others (specify type of measure + no. of sites)					

Evaluation of draft Manual

3. Could you make use of the Manual for one of the following actions? (Answer yes/no)

Preparing the inspection(s)		Carrying out the inspection(s)		Follow-up	
-----------------------------	--	--------------------------------	--	-----------	--

4. Did you find the Manual useful for those actions? (1 = yes, 2 = sometimes, 3 = no)

Preparing the inspection(s)		Carrying out the inspection(s)		Follow-up	
-----------------------------	--	--------------------------------	--	-----------	--

5. What, if at all, did you find most useful? (Please specify)

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6. What is missing and should be supplemented to improve the Manual? (Please specify)

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7. Further remarks and comments

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