



WasteForce Crime Alert #7

June- Aug 2020

Date: 31 Aug 2020

Version: 1

Work Package 2: Strategies and Methodologies

Deliverable 2.1: Waste Crime Alerts



The WasteForce project is funded by the European Union's Internal Security Fund – Police (ISFP/2017/AG/ENV/821345)

WASTEFORCE
Waste Crime Alert 7

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1. Introduction

The objective of the Waste Crime Alerts is to provide authorities with an up-to-date overview of developments in the illicit waste trade. The Waste Force project partners collected and analysed the latest information on waste crime to identify trends and possible threats of illegal waste trade, for example to certain geographic locations/routes and the identification of modus operandi for specific waste flows. The collected open source information includes news cases, enforcement agency bulletins, outcomes of court cases, relevant publications, policy updates and relevant videos and documentaries. The Waste Crime Alert will be published by the WasteForce project every three months.

This Waste Crime Alert #7 summarises information that was published between June and August 2020. The waste crime alerts report primarily on transboundary waste crime cases. The Waste Crime Alert is structured as follows:

1. Introduction
2. Summary of Publications and Legislative updates, see also the overview in Annex I
3. Analysis of News cases published, see also the overview in Annex II
4. Summary of IGO Enforcement actions, see also the overview in Annex III
5. Summary of Media, see also the overview in Annex IV

2. Summary of new publications and legislative and governance updates. ([Annex I](#))

In this section a summary will be presented of recent publications, sources of each publication can also be found in Annex I.

With regards to [updates in legislation and governance](#), the *Basel Action Network* published an article about the proposed Delegated Regulation of the EU regarding the new trade controls on unrecyclable waste. While the European Union joined Norway in co-sponsoring amendments to establish new trade controls on dirty and unrecyclable waste, the draft regulation does not intent to fully apply the new trade controls in the EU market. *Greenberg Traurig* reported that the European Commission has opened a consultation on the adaptation of amendments to the European Union's law on transboundary shipments of waste. The *Basel Action Network* also published an article about proposed changes in regulation in New Zealand. The ministry is proposing to meet the Basel Convention requirements and include "mixed plastic waste" in its "Import and Exports Order" permitting system. The Convention, in effect from January 2021, requires that most "mixed plastic" waste exports would require prior informed consent from the receiving countries.

Finally, *the Environmental Protection Department of Hong Kong* has opened a page with Frequently asked questions about import and export of waste to/from Hong Kong.

In Annex I an overview can be found of ten news [articles about issues related to plastic waste pollution and illegal trade](#). According to the *Basel Action Network*, India and other countries have been hit with the inflow of plastic scrap since the Ban of China. The inflow of plastic in Turkey has also reached its highest level in 2019 with on average a monthly import quantity of 48,500 tons. According to *The Intercept* the plastics waste crisis is effecting some of the poorest individuals in developing countries, where there are no government-funded waste collection or recycling systems. For example in Kenya plastic waste is causing massive human rights and child labour problems. *The Intercept* also posted an article about how plastic waste is making Central American Communities uninhabitable. *The Korea Times* posted an article stating concern about the increased use of single-plastics since the spread of COVID-19, that could end up in the oceans. *The Document Journal* posted an article about the issues with plastic processing in Vietnam. And finally, *The Print* also published an article reporting about the concern that action on plastic pollution has been slowed during the COVID-19 pandemic, but also that there is a new emerging angle to address this pollution and enable a transition to a greener and more circular economy.

To comply with the new Chinese legislation, the Mediterranean Shipping Company (MSC) stopped accepting shipments of recovered plastics, fiber, metals and chemicals headed for China and Hong Kong from June 2020. Also the German shipping company Hapag-Lloyd said it will stop accepting cargoes of solid waste, including scrap metal, bound for China from 1 September 2020 onwards to comply with new legislation.

Annex I of this WCA also includes links to [four new reports and scientific articles](#). In July 2020 the Global E-waste Monitor was published by *UNU-ViE SCYCLE, ITU and ISWA*. The Global E-waste Monitor 2020 provides the most comprehensive overview of the global e-waste challenge, explains how it fits into international efforts to reach the Sustainable Development Goals, and discusses how to create a sustainable society and circular economy.

A new *INTERPOL* strategic report on global plastic waste management has found an alarming increase in illegal plastic pollution trade across the world since 2018. The report indicates that there has been a considerable increase over the past two years in illegal waste shipments, primarily rerouted to South-East Asia via multiple transit countries to camouflage the origin of the waste shipment. Other key findings include an increase in illegal waste fire and landfills in Europe and Asia, a significant rise in the use of counterfeit documents and fraudulent waste registrations, with case studies from each of the contributing countries illustrating the extent and complexity of the problem. Based on open sources and criminal intelligence from 40 countries, the report provides a comprehensive global picture of emerging trafficking routes and crime threats in the plastic waste market, and recommends tailored enforcement responses.

Ecoprog published a study about plastic recycling in Europe is an analysis of plastics recycling in Europe, including of 1200 sorting plants and 1,000 plastic recycling plants.

There are also two scientific publications included, one about conceptualising transnational organised crime at sea, including waste crime and the other is a revised article about the transboundary hazardous waste movements after the Basel Convention.

Finally, the Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning published [two summaries of join inspections](#) in Slovenia in June and July.

3. Analysis of news cases (Annex II)

This section presents an analysis of the news cases of transboundary waste movements between June 2020 and August 2020. In total, 15 cases were collected, of which an overview can also be found in Annex II.

Figure 2: Global map with the listed news cases, the colours are linked to the origin or destination country
For more information follow this [Link](#).



-  Origin country or national case
-  Destination country or national case

1. Types of waste and routes

Types of waste reported	Routes and case numbers
Plastic	United Kingdom > Latvia (case 5)
	Europe (UK, Italy, Germany, France) > Turkey (case 9)
Metal	Romania > Indonesia (case 6)
	Netherlands (case 7)
Ozone Depleting Substances (HFCs)	China > Poland (case 1)
E-waste	Canary Islands Spain > several countries in Africa (case 4)
Tyres	Croatia > Italy > Africa (case 10)
Mixed waste and other	China (case 3)
	Belgium > France (case 8)
	Slovenia > Italy (case 11)
Hazardous waste	Italy > Bulgaria (case 2)
	Spain > Africa (case 9)
	Romania > Malaysia > Indonesia (case 10)
	The Netherlands > Belgium (case 12)
	Italy (case 13 and 14)
	Spain (case 15)

Table 1: Overview of types of waste and routes reported in the news cases

2. Quantities and values

The following quantities and values were reported for illegal trade flows:

- Refrigerants: illegal export from China to Poland of 14 tonnes, involving 1150 cylinders.
- Plastic: illegal export from the United Kingdom to Latvia of 549 tonnes of plastic and rubber waste.
- Tyres: illegal export from Croatia via Italy to countries in Africa of 13,2 tonnes of tyres

Hazardous waste including metals:

- Illegal shipments (138) from the Canary Islands to Africa containing 2500 tons of hazardous waste, of which 750 tons of e-waste.
- Illegal export from Romania to Indonesia of 110 containers of hazardous heavy metals including 1,864 tonnes of electric arc furnace dust (EAFD)

Other waste:

- Illegal export from Belgium to France of at least 780 tonnes of rubber and household waste.
- Illegal export from Slovenia to Italy of 20 tonnes of non-hazardous waste.
- The seizure of 598,800 tonnes of different types of illicit waste imported in China from different countries.

In total 5,740 tonnes of waste was illegally shipped plus a summary of seizures in China of 598,000 tonnes.

3. Modus operandi

Types of modus operandi reported for the illegal export were:

- Export without a correct permit;
- Unreported export, smuggling;
- False declaration (e.g. EAFD declared as concentrated zinc);
- Waste declared as second-hand goods (electrical and electronic equipment, this was sourced from waste bins and on the street and shipped as used equipment);

Illegal storage and management:

- Lack of a permit to manage plastic and rubber waste;
- Lack of compliance with the permit;
- Illegal disposal;

Other organized illicit activities including illicit competition, threat and violent acts, attempted murder and illicit possession of firearms;

4. Criminal organisations

In six of the cases the (suspected) involvement of organised crime groups was reported. In case 2, two brothers who owned a recycling business were linked to a list of names of media bosses and entrepreneurs who were assassinated in the 1990s. Sums running into millions of dollars were entered against some of the names. These brothers were working under demand of a deputy minister that authorised the illegal trafficking of waste. In case 3, the operation “Blue Sky 2020” led to the capture of 80 criminal suspects in 38 smuggling syndicates. In case 4 and 8, there is suspected involvement of an organised crime group. In case 13 there was involvement of a criminal group composed by entrepreneurs, lawyers and professionals in the nautical sector. Finally, in case 14 there was also involvement of organized crime (Sicilian mafia) and of public officers working in the waste collection/treatment municipal company.

In two other cases the involvement of recycling companies was reported. In case 5 a recycling company illegally imported waste and in case 7 a recycling company is suspected to be involved in other criminal activities including money laundering, forgery, possession of stolen property, and various environmental crimes.

5. Summary of IGO Enforcement action, see also the overview in Annex III

The joint RETROVIRUS operation was coordinated by EUROPOL in cooperation with the EnviCrimeNet network. Operation RETROVIRUS aims to prevent "inappropriate" / illegal collection, transport, management and management of sanitary waste (contrary to international, EU and national legislation and international conventions) for activities against the spread and treatment of the COVID epidemic 19. In Annex III a link can be found for more information.

As part of the operation RETROVIRUS more than 500 inspections were conducted in Spain by the Guardia Civil, and 184 infractions have been reported with regard to irregularities in the management, transport and disposal of medical waste mainly related to the Covid pandemic. These infractions are both dangerous for the pollution of the ecosystem and for the possible transmission of the virus (see also case 15 in Annex II).

6. Summary of media, see also the overview in Annex IV

In Annex IV a link can be found to a video about an investigation by BBC news into plastic waste that is sent from Britain to Turkey for recycling, but is instead being dumped and burned on the side of roads. There is also a second link to a video about unauthorized landfills in France, where Belgian waste is dumped illegally.

Annex I: Publications and Legislative/Policy Updates

Legislation and Governance

Title **EU Promotes Greater Global Responsibility on Plastic Waste - But Not for Internal Market!**

Organisation Basel Action Network

Type of waste Plastic

Date 6-7-2020

Summary In April of last year, the European Union joined Norway in co-sponsoring amendments to the world's only waste treaty to establish new trade controls on the dirtiest and most unrecyclable plastic wastes. However, last week, the European Commission made it official in their publication of the proposed Delegated Regulation that the EU does not intend to fully apply these new trade controls themselves between their own member states. The draft regulation would allow some plastic wastes to instead be freely traded in the EU market without the newly agreed controls. These plastics have recently been regulated under the Basel Convention's Annex II due to the difficulty in recycling them, and the risks they pose to human health and the environment particularly when they are burnt. They include a wide set of mixed plastic wastes, PVC and PTFE (Teflon) wastes, as well as all manner of plastic waste not destined for mechanical recycling.

Links <https://www.ban.org/news/2020/5/21/regulation-could-clean-up-new-zealands-exports-of-contaminated-recycling-to-developing-countries>

Title **Regulation could clean up New Zealand's exports of contaminated recycling to developing countries**

Organisation Basel Action Network

Type of waste Plastic

Date 21-5-2020

Summary The Ministry is proposing changes to its Imports and Exports Order to meet Basel Convention requirements, and include "mixed plastic waste" in New Zealand's permitting system. The convention, in effect from January 2021, means most "mixed plastic" waste exports would require prior consent from the receiving countries, a Ministry for the Environment spokeswoman said. Currently, the Environmental Protection Authority (EPA) is only required to issue permits for exports of "hazardous" plastic waste, or plastic waste mixed with other waste. Environmental anthropologist Dr Trisia Farrell said "We need to make sure that there's clear limits for the contamination of our waste shipped offshore."

Link <https://www.ban.org/news/2020/5/21/regulation-could-clean-up-new-zealands-exports-of-contaminated-recycling-to-developing-countries>

Title **EU Opens Consultation on Rules for Transboundary Plastic Waste Shipments**

Organisation GreenbergTraurig

Type of waste Plastic waste
Date 2-7-2020
Summary The European Commission has opened a consultation on the adoption of amendments (currently available in draft form) to the European Union's law on the transboundary shipments of waste. These amendments are intended to allow the EU to give effect to recent changes to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (the Convention) which significantly extend the Convention's scope in relation to plastic waste.
Link <https://www.gtlaw.com/en/insights/2020/7/eu-opens-consultation-on-rules-for-transboundary-plastic-waste-shipments>

Title **Guidelines & References - Control on Import and Export of Waste**

Organisation Environmental Protection Department Hong Kong
Type of waste Hazardous waste
Date 14-7-2020
Summary Frequently asked questions about import and export of waste to/from Hong Kong
Link https://www.epd.gov.hk/epd/english/environmentinhk/waste/guide_ref/guide_wiec_faq.html

News Articles

Title **Millions against rubbish**
Organisation KfW
Type of waste Plastic
Date 22-1-2019
Summary How can the plastic pollution of our oceans be stopped? A multimillion dollar waste project financed by KfW in Indonesia shows that the battle against marine litter must also be fought on land. At the moment, EUR 75 million is available for the construction of landfills with sorting and composting facilities in Jambi, Sidoarjo, Jombang and Malang. A further EUR 7.6 million will be used to ensure that municipalities are ready to operate these facilities in a sustainable way, to organise proper waste collection and to convince the population of the importance of "the three R's" – reduce, reuse and recycle.
Link <https://www.kfw.de/stories/environment/nature-conservation/solid-waste-management-indonesia/>

Title **Is India Becoming America's Trash Bin for Illegal Plastic Waste?**
Organisation Basel Action Network

Type of waste Plastic
Date 30-1-2020
Summary Since China banned the import of containers carrying scrap paper, plastics and metals for recycling and reuse, other countries have been hit with the

inflow of plastic scrap. While Indonesia promised to send back illegal plastic waste to the origin countries, BAN found out it was illegally converted to countries like India, Thailand, South Korea and Vietnam. The waste was categorised as paper scrap when, in reality, it comprised of plastic and other hazardous materials

Link <https://www.ban.org/news/2020/1/30/is-india-becoming-americas-trash-bin-for-illegal-plastic-waste>

Title **Plastic waste sent from EU to Turkey increased by almost 200 times**

Organisation Basel Action Network

Type of waste Plastic

Date 27-6-2020

Summary The amount of plastic waste sent from European Union countries to be processed in Turkey increased 173-fold since 2004, news website Diken reported on Friday. This means that Turkey is receiving an average of 213 trucks of plastic waste from the EU every day. Turkey's plastic waste imports reached their highest ever level in 2019, at an average monthly quantity of 48,500 tons, Diken reported. The highest plastic waste exporters to Turkey last year were Britain (153,967 tons), Italy (89,470), Belgium (85,843), Germany (67,466), and France (56,824).

Link <https://www.ban.org/news/2020/6/29/plastic-waste-sent-from-eu-to-turkey-increased-by-almost-200-times>

Title **Shipping giant stops e-plastic exports to Hong Kong**

Type of waste Plastic, metal

Organisation Basel Action Network

Date 18-6-2020

Summary Mediterranean Shipping Company (MSC) this month stopped accepting shipments of recovered plastics, fiber, metals and chemicals headed for China and Hong Kong "complying with recently updated Chinese legislation". The company issued a notice to customers outlining the change, which took effect June 1.

Link <https://www.ban.org/news/2020/6/18/shipping-giant-stops-e-plastic-exports-to-hong-kong>

Title **Africa's exploding plastic nightmare**

Type of waste Plastic

Organisation The Intercept

Date 19-4-2020

Summary While the plastics crisis has largely played out on the administrative level in the U.S., burdening local governments with the growing costs and logistics of managing plastic garbage, in developing countries that have no government-funded waste collection or recycling systems, those burdens fall on individuals. In Kenya, where some 18 million people live on less than \$1.90 per day, the responsibility offloaded by some of the most profitable companies in the world falls to some of the poorest individuals in the world. And Kenya is just one of dozens of developing countries where plastic is causing massive human rights and child labor problems, in addition to

environmental devastation. Wealthy countries fail to recycle the vast majority of their plastics.

Link <https://theintercept.com/2020/04/19/africa-plastic-waste-kenya-ethiopia/>

Title **River of trash**

Type of waste Plastic

Organisation The Intercept

Date 27-10-2019

Summary The article is about how plastic pollution is making Central American Communities uninhabitable.

Link <https://theintercept.com/2019/10/27/plastic-pollution-guatemala/>

Title **Plastic pollution plagues Southeast Asia amid Covid-19 lockdowns**

Organisation The Korea Times

Type of waste Plastic

Date 10-8-2020

Summary With consumers around the world stuck at home amid the spread of Covid-19 — which has infected close to 19 million people and killed more than 700,000 — the utilisation of single-use plastic has skyrocketed, raising concerns about recycling and surging pollution. Many people are reliant on food delivery services and online shopping platforms to obtain goods and stay connected, with a corresponding increase in disposable packaging. Southeast Asia is no different. More than 50 per cent of the eight million tonnes of plastic waste that ends up in the world's oceans every year comes from Indonesia, the Philippines, Vietnam and Thailand, environmental advocacy group Ocean Conservancy estimates — partly because richer Western countries such as Australia, Canada, Britain and the United States have sent massive shipments of waste to these countries for decades.

Link https://www.koreatimes.co.kr/www/world/2020/08/501_294157.html

Title **The pandemic built new trade barriers that hurt plastic pollution**

Organisation The Print

Type of waste Plastic waste

Date 1-8-2020

Summary Action on plastic pollution has been slowed considerably during the COVID-19 pandemic – but there's a new emerging angle that could help rebuild momentum for the transition to a greener and more circular society. Governments at the World Trade Organization (WTO) are also showing increased interest in tackling plastics pollution. Cross-border frictions prevent economies of scale in tackling plastic pollution. Governments must collaborate to scale the circular economy at a global level. The article gives a different recommendations related to traceability, data, border measures, internal measures and transparency.

Link <https://theprint.in/features/the-pandemic-built-new-trade-barriers-that-hurt-plastic-pollution/472610/>

Title Vietnam’s “plastic village” is the tale of Western excess
Organisation Document Journal
Type of waste Plastic
Date 7-8-2020
Summary In July 2018, the Vietnamese government announced it would curb the legal and illegal importation of plastic after waste shipments to the country surged following China’s ban of several types of solid waste earlier in the year. Vietnam Customs reported that the country imported 9.2 million tons of scrap material in 2018, a 14 percent increase since 2017. The Ministry of Natural Resources and the Environment cited environmental concerns as the impetus for the policy change. As plastic processing becomes more lucrative than farming, many people travel to Minh Khai to work long hours in factories or workshops. These workers and nearby residents are exposed to hundreds of chemicals— including hydrochloric acid, sulphur dioxide, and heavy metals—which can lead to developmental disorders, endocrine disruption, and cancer.
Link <https://www.documentjournal.com/2020/08/vietnams-plastic-village-is-the-tale-of-western-excess/>

Title Hapag-Lloyd to halt waste shipments to China
Organisation Business Insider
Type of waste Solid waste
Date 26-6-2020
Summary German container shipping line Hapag-Lloyd said it had notified customers it will stop accepting cargoes of solid waste, including scrap metal, bound for China that arrive from Sept. 1 onwards to comply with new legislation.
Link <https://www.businessinsider.com/hapag-lloyd-to-halt-waste-shipments-to-china-2020-6>

Studies/Reports

Title Plastics recycling in Europe
Type of waste Plastic
Organisation ecoprog GmbH
Date July-2020
Summary The study “Plastics recycling in Europe” includes: "A detailed analysis of all the important political, economic, operational and technical trends in European plastics recycling."; " The description and analysis of over 1,200 sorting plants and over 1,000 plastics recycling plants (by site), including significant key data on operators, input and capacities (wherever possible)."; "A detailed assessment of this data as well as an analysis of the legislation and the market factors at country level (30 European countries). This also includes capacities and market shares of sorting and recycling by country."; "Background about the planning boom for chemical recycling plants in Europe and an overview of more than 30 chemical recycling projects.".

Link	https://www.ecoprogram.com/fileadmin/user_upload/leseproben/extract_plastics_recycling_europe_ecoprogram.pdf
Title	Strategic Analysis Report: Emerging criminal trends in the global plastic waste market since January 2018
Type of waste	Plastic
Organisation	INTERPOL
Date	27-08-2020
Summary	A new INTERPOL strategic report on global plastic waste management has found an alarming increase in illegal plastic pollution trade across the world since 2018. The report, entitled <i>INTERPOL's strategic analysis on emerging criminal trends in the global plastic waste market since January 2018</i> , indicates that there has been a considerable increase over the past two years in illegal waste shipments, primarily rerouted to South-East Asia via multiple transit countries to camouflage the origin of the waste shipment. Other key findings include an increase in illegal waste fire and landfills in Europe and Asia, a significant rise in the use of counterfeit documents and fraudulent waste registrations, with case studies from each of the contributing countries illustrating the extent and complexity of the problem. Based on open sources and criminal intelligence from 40 countries, the report provides a comprehensive global picture of emerging trafficking routes and crime threats in the plastic waste market, and recommends tailored enforcement responses. The report points to the link between crime networks and legitimate pollution management businesses which are used as a cover for illegal operations, with criminals often resorting to financial crime and document forgery to carry out their global operations.
Link	https://www.interpol.int/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime https://www.interpol.int/content/download/15587/file/INTERPOL%20Report%20criminal%20trends-plastic%20waste.pdf
Title	Global E-waste monitor 2020
Type of waste	E-waste
Organisation	UNU-VIE SCYCLE, ITU, ISWA
Date	July-2020
Summary	The Global E-waste Monitor 2020 provides the most comprehensive overview of the global e-waste challenge, explains how it fits into international efforts to reach the Sustainable Development Goals, and discusses how to create a sustainable society and circular economy. The report provides a national and regional analysis on e-waste quantities and legislative instruments, and makes predictions until 2030. It also encourages decision-makers to increase activities to measure and monitor e-waste using an internationally recognised methodological framework.
Link	https://publications.globalewaste.org/v1/file/271/The-Global-E-waste-Monitor-2020-Quantities-flows-and-the-circular-economy-potential.pdf
Title	Blue crime: Conceptualising transnational organised crime at sea (Academic article with restricted access)
Type of waste	All types
Organisation	Marine Policy, Christian Bueger and Timothy Edmunds

Date	29-6-2020
Summary	Academic article about conceptualising transnational organised crime at sea, including illegal shipments of waste.
Link	https://www.sciencedirect.com/science/article/abs/pii/S0308597X20300270?via%3Dihub
Title	Trade for the Environment: Transboundary Hazardous Waste Movements After the Basel Convention (Academic article with open access)
Type of waste	Hazardous waste
Organisation	Review of Policy Research, Shiming Yang
Date	06-03-2019, revised 27-07-2020
Summary	Current literature emphasizes North–South conflict under the Basel Convention as a main reason for these shortcomings. This paper returns to the fundamental question as to why countries engage in this trade. It contends that hazardous wastes are not only characterized by their environmental impacts, but are also distinct in the ways they are generated, distributed, and managed. I argue that global economic integration has commodified these wastes, and countries are increasingly diverging on their views of hazardous materials. [...] As globalization deepens, management of hazardous wastes may require extensive trade of hazardous materials between countries of varying capabilities and interests. Contrary to its current trade minimization approach based on a crude North–South dichotomy, the Basel Convention may benefit from an approach that motivates capable countries to import wastes and one that builds capacity for intended waste importers.
Link	https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3386820

Inspection summary

Title	Control actions to prevent the negligent management of medical waste, in order to prevent the spread of COVID 19 virus and other diseases
Type of waste	Medical waste
Organisation	Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning
Date	28-7-2020
Summary	Summary of joint inspections in Slovenia, realised in July. The main focus of inspections was prevention of negligent management of sanitary waste, in order to prevent the spread of COVID 19 virus and other diseases
Link	https://www.gov.si/novice/2020-07-28-akcije-nadzora-za-preprecevanje-malomarnega-ravnanja-s-sanitarnimi-odpadki-z-namenom-preprečitve-sirjenja-virusa-covid-19-in-drugih-bolezni/
Title	Control actions for cross-border shipments of waste in June.
Type of waste	Medical waste
Organisation	Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning
Date	27-7-2020
Summary	Summary of joint inspections in Slovenia, realised in June. The focus of the controls was on the prevention of environmental crime directly related to the

COVID-19 epidemic, with an emphasis on the prevention of illegal handling and transport of sanitary waste. The way waste is collected, transported, treated and ultimately disposed of is crucial to curbing the spread of the epidemic.

Link

<https://www.gov.si/novice/2020-07-02-akcije-nadzora-cezmejneg-posiljanja-odpadkov-v-mesecu-juniju/>

Annex II: Cases reported in the news

Case 1. China- Poland

Title	Customs seize 14 tonnes of illegal HFC in Rotterdam
Date	3-7-2020
Type of waste	HFCs: shipment included R410A, R32 and R404A.
Quantity/Value	It involved 1,150 cylinders, all of them illegal non-refillables, 14 tonnes.
Routes	The shipment coming from China was initially discharged in the port of Hamburg and declared in transit towards Rotterdam, in the Netherlands, despite the fact that the final destination was Lithuania. Further investigations established that the cargo was destined for a storage facility in Poland.
Type of crimes/ Modus Operandi	Illegal export and illegal storage.
Enforcement Action	The successful seizure is said to have been the result of close cooperation between the European Anti-Fraud Office (OLAF) and authorities in the Netherlands, Lithuania and Poland.
Criminal organisation Summary	Unreported The European Anti-Fraud Office's crackdown on the illegal trade in HFCs has led to the seizure of 14 tonnes of illegal refrigerants at the port of Rotterdam. It has not been revealed the exact refrigerants seized but photographs indicate the shipment included R410A, R32 and R404A. It involved 1,150 cylinders, all of them illegal non-refillable. OLAF's investigation began when it identified a suspicious cargo destined for a consignee in Lithuania that was not registered to receive imports of this nature. In addition, the shipment coming from China was initially discharged in the port of Hamburg and declared in transit towards Rotterdam, in the Netherlands, despite the fact that the final destination was Lithuania. Further investigations established that the cargo was destined for a storage facility in Poland.
For more information, please visit:	https://www.coolingpost.com/world-news/customs-seize-14-tonnes-of-illegal-hfc-in-rotterdam/

Case 2. Italy - Bulgaria

Title	Bulgarian minister charged over illegal waste imports from Italy
Date	31-5-2020
Type of waste	Dangerous waste such as batteries, lead and polyethylene.
Quantity/Value	Quantities are not reported for the burning, but in the past 157 containers were sent back from Sofia to Italy
Routes	Italy to Bulgaria
Type of crimes/ Modus Operandi	The imported waste was not recycled but illegally burnt.

Enforcement Action	Bulgaria's deputy environment minister Krassimir Zhivkov has been arrested and charged for his alleged role in illegally importing harmful waste from Italy and burning it. Also the business men the Bobokovi brothers have been arrested. Bobokovi brothers were detained for 24 hours and will most likely be charged with participation in an organized crime group and tax crimes.
Criminal organisation	Italian and Bulgarian authorities had been investigating two Bulgarian brothers operating in their countries. They own a recycling business. During a raid on Friday on the home of the businessmen in the Bulgarian town of Rousse, the police found a list of names of media bosses and entrepreneurs who were assassinated in the 1990s. Sums running into millions of dollars were entered against some of the names. "Deputy minister Krassimir Zhivkov pressured his subordinates to authorise the illegal trafficking of waste" from Italy.
Summary	Bulgaria's deputy environment minister Krassimir Zhivkov has been arrested and charged for his alleged role in illegally importing harmful waste from Italy and burning it, prosecutors said Saturday. Italian and Bulgarian authorities had been investigating two Bulgarian brothers operating in their countries. They own a recycling business and deal with dangerous waste such as batteries, lead and polyethylene. "Deputy minister Krassimir Zhivkov pressured his subordinates to authorise the illegal trafficking of waste" from Italy, prosecutor Dolka Brezashka said, asking for him to be held in custody.
For more information, please visit:	https://www.macaubusiness.com/bulgarian-minister-charged-over-illegal-waste-imports-from-italy/ https://www.novinite.com/articles/204679/Development%3A+More+Arrested+for+Illegal+Import+of+Waste+from+Italy?fbclid=IwAR16_IQa1I3ngfh9ajv9qeJp-ZDBH7YAMyvOSCMhCJPHwVP3tFw8h5kNzek https://www.ban.org/news/2020/5/29/development-more-arrested-for-illegal-import-of-waste-from-italy

Case 3. - China

Title	China uncovers over 500k tonnes of illegal waste in latest crackdown
Date	19-6-2020
Type of waste	Different types of illicit waste including waste oil and slag
Quantity/Value	The seizure of 598,800 tonnes of illicit imported waste. The GAC also announced that Chinese imports of solid waste are down 42.5 per cent year-on-year, totalling 3,225,000 tonnes between January and May of this year. Solid waste smuggling cases have also seen a decrease of 58.1 per cent year-on-year, with the GAC handling 81 criminal cases despite the disruption caused by the global Covid-19 pandemic.
Routes	Unreported
Type of crimes/ Modus Operandi	Smuggling
Enforcement Action	The 'Blue Sky' initiative was first launched in a 2018 campaign, which cracked down on illegal imports of 24 grades of waste banned earlier that year. This followed in the vein of previous campaigns including 2013's Operation Green Fence and 2017's National Sword Campaign. On Wednesday (17 June), China's General Administration of Customs (GAC)

announced that the Guangdong Sub-Administration and 12 participating Customs Districts had successfully busted 38 smuggling syndicates. The capture of 80 criminal suspects in 38 smuggling syndicates

Criminal organisation Summary

Chinese customs authorities have intercepted over 500,000 tonnes of illegal waste under the 'Blue Sky 2020' anti-smuggling campaign and plan to continue the crackdown on illicit domestic and foreign waste imports.

For more information, please visit: <https://resource.co/article/china-uncovers-over-500k-tonnes-illegal-waste-latest-crackdown>

Case 4. Canary Islands Spain- countries in Africa

Title 2 500 tonnes of waste trafficked from the Canary Island to Africa

Date 29-6-2020

Type of waste Second-hand items, such as vehicle parts, household goods, and a huge amount of electrical waste and electronic equipment.

Quantity/Value 2 500 tonnes of waste trafficked from the Canary Island to Africa

Routes The Canary Islands, Spain to countries in Africa

Type of crimes/ Modus Operandi The criminals loaded maritime containers with second-hand items, such as vehicle parts, household goods, and a huge amount of electrical waste and electronic equipment. The investigation carried out by the Spanish officers concluded that the unwanted electronics were shipped to several countries in Africa to be sold on to buyers there. The items sold were all obsolete and were not fit for use as the criminal network had primarily sourced the equipment from rubbish bins and on the street.

Enforcement Action An organised crime group has been dismantled by the Spanish Civil Guard SEPRONA, with the support of Europol and the Italian Carabinieri.

Criminal organisation Summary An organised crime group. Those arrested are also suspected of document fraud to carry out their illegal activities. 750 000 kg of electrical waste and electronic equipment was among the waste seized by the Spanish Civil Guard (Guardia Civil) after a two-year investigation.

For more information, please visit: <https://www.europol.europa.eu/newsroom/news/2-500-tonnes-of-waste-trafficked-canary-islands-to-africa>

Case 5. United Kingdom - Latvia

Title Latvia to repatriate 'illegal' UK waste

Date 26-6-2020

Type of waste Plastic and rubber

Quantity/Value 549 tonnes of waste

Routes United Kingdom to Latvia and repatriation back to the United Kingdom.

Type of crimes/ Modus Operandi Why Recycle imported the waste from the UK. They does have a valid permit for storing or temporarily sorting municipal waste, but not to manage the plastic and rubber waste, according to the Latvian regulator. It has also been claimed by the VVD that the cargo's accompanying documents provide incorrect information, namely, "a poorly sorted mixture of municipal

waste is assigned to plastic waste". The VVD also claimed that the company had not complied with the conditions of the issued polluting activity permit, as it had improperly managed the waste. The company was reported to have stored municipal waste in an unauthorised place, which the VVD said created a "danger to the surrounding environment by polluting and littering". According to the Latvian authorities, waste can only be imported to Latvia to recovery facilities that have "adequate capacity" and a permit for the recovery of the waste, and shipments of non-classified waste can only take place subject to prior written notification and consent.

**Enforcement
Action**

The Latvian Environment Service, known as VVD, said it carried out an inspection on "possible illegal transboundary waste shipments" and has "started to take measures" to repatriate the waste. They are working with the Latvian authorities to investigate the circumstances around these particular exports, and will take appropriate action to hold those responsible to account should there be any evidence of wrong-doing – and to ensure any illegally exported waste is repatriated to the UK."

**Criminal
organisation
Summary**

A Latvian materials recycling company, Why Recycle, imported the waste from "various companies in Great Britain" between 25 May to 16 June 2020. The Environment Agency is working with its counterpart in Latvia into an investigation into possible illegal waste exports from the UK. State Environment Service for Latvia has indicated it will repatriate 549 tonnes of waste "imported from Great Britain".

**For more
information,
please visit:**

<https://www.letsrecycle.com/news/latest-news/latvia-to-repatriate-illegal-uk-waste/>
<https://eng.lsm.lv/article/society/environment/illegal-waste-imports-into-latvia-stopped.a364327/>

Case 6. Romania – Indonesia (via Malaysia)

Title	Malaysia uncovers largest abandoned shipment of illegal toxic waste from Romania
Date	19-7-2020
Type of waste	Hazardous heavy metals: lectric arc furnace dust (EAFD) - a by-product of steel production that contains heavy metals like zinc, cadmium and lead.
Quantity/Value	110 containers of hazardous heavy metals: 1,864 tonnes of electric arc furnace dust (EAFD).
Routes	The containers were found abandoned at the Tanjung Pelepas port in Malaysia, they originated from Romania and were bound for Indonesia.
Type of crimes/ Modus Operandi	The EAFD, classified as a toxic waste under the Basel Convention, had been listed as concentrated zinc in declaration forms. "The Department of Environment, as the Basel Convention authority (for Malaysia), has not granted approval for or received notifications from the waste exporter to transit in Malaysia," he said.
Enforcement Action	Malaysia has contacted the Romanian Basel Convention authority to arrange for the repatriation of the containers and have engaged Interpol for further investigations, Bernama said.
Criminal organisation Summary	Unreported. Malaysia discovered 110 containers of hazardous heavy metals from Romania and bound for Indonesia that had illegally entered the country and

were abandoned last month, its largest case of dumped toxic waste, state media Bernama reported on Sunday.

For more information, please visit:

<https://www.reuters.com/article/us-malaysia-environment/malaysia-uncovers-largest-abandoned-shipment-of-illegal-toxic-waste-from-romania-idUSKCN24K0DK>
https://www.telegraaf.nl/nieuws/1275090890/maleisie-onderschept-1-8-miljoen-kilo-giftig-afval-uit-roemenie/?utm_source=whatsapp&utm_medium=referral&utm_campaign=whatsapp

Case 7. Netherlands

Title Gold worth millions of euros seized at recycling company in Limburg

Date 15-7-2020

Type of waste Metals (gold) (no confirmed relation with waste crime)

Quantity/Value Hundreds of kilograms of gold (no confirmed relation with waste crime)

Routes NA

Type of crimes/ Unreported

Modus

Operandi

Enforcement Two company officials were arrested

Action

Criminal organisation The public prosecutor suspects the company of involvement in money laundering, forgery, possession of stolen property, and various environmental crimes. Two company officials were arrested.

Summary The Dutch authorities seized hundreds of kilograms of gold, worth millions of euros, during an investigation into a Limburg recycling company suspected of money laundering. Various other items were also found at the company, including a container filled with mortar grenades and old ammunition, the Public Prosecution Service (OM) said in a statement on Wednesday. Two people were arrested. The authorities searched the recycling company as well as three homes belonging to company officials. They found and seized hundreds of kilograms of gold, about 450 thousand euros in cash, three properties, cars including a Maserati, Ferrari and Porsche, and 17 expensive watches, including from the brands Rolex and Audemars Piguet. Various firearms and related ammunition were also seized.

For more information, please visit:

<https://nltimes.nl/2020/07/15/hundreds-kilos-gold-seized-limburg-money-laundering-investigation>
<https://www.nu.nl/binnenland/6064518/miljoenen-euros-aan-goud-in-beslag-genomen-bij-limburgs-recyclingbedrijf.html>

Case 8. Belgium - France

Title Unauthorized landfills, full of Belgian waste dumped illegally, pollute French Lorraine

Date 25-6-2020

Type of waste rubber, household waste

Quantity/Value at least 780 tonnes

Routes	Anvers, Brecht in Belgium to villages in Lorraine, France
Type of crimes/ Modus Operandi	Illegal export and disposal
Enforcement Action	French public prosecutor's office has opened an investigation for fraud in an organized group and criminal association. Another investigation is ongoing in Belgium.
Criminal organisation	Probable involvement of a criminal organisation
Summary	Several hundred tons of rubble and other household waste were dumped illegally in a dozen villages in Lorraine by a Belgian transporter at the request of a customer, a Belgian waste collection centre which believed to send its cargoes of waste to a French waste sorting centre, managed by a Lyon company, whose director says not being aware of such an agreement and denies having issued the delivery notes that he considers falsified. All these players were put in touch by an intermediary who admits having earned between "200 and 220,000 euros" with this transport of waste but denies having falsified the order forms and claims to have been the victim of another intermediary.
For more information, please visit:	https://www.demotivateur.fr/article/des-centaines-de-tonnes-de-dechets-illegaux-provenant-de-belgique-deverses-a-la-frontiere-francaise-21470 https://www.consoglobe.com/trafic-de-dechets-belgique-france-cg

Case 9. Spain - Africa

Title	34 people arrested in Spain for illegal trafficking of electronic waste to Africa
Date	29-6-2020
Type of waste	hazardous waste
Quantity/Value	138 shipments, and one stopped shipment of 2500 tonnes
Routes	From Tenerife, Spain to Senegal, Ghana, Gambia, Togo, Benin, Guinea, Sierra Leone and Nigeria.
Type of crimes/ Modus Operandi	Illegal shipment of waste
Enforcement Action	34 people arrested by European and Spanish police
Criminal organisation	African and European organised group
Summary	34 people mainly from Africa have been arrested by European and Spanish police for trafficking electronic waste to Africa. Between 2018 and 2019, 138 transfers of hazardous waste were carried out from Spain to Africa. According to the press release from the Spanish police, the network loaded in boat the waste and a 62-year-old Italian woman was responsible for transmitting the necessary documents to customs, falsifying certificates to make it appear that these devices were working perfectly.
For more information, please visit:	https://www.agenceecofin.com/actualites/2906-77986-34-personnes-arretees-en-espagne-pour-trafic-illegal-des-dechets-electroniques-a-destination-de-lafrique

<https://lanouvelletribune.info/2020/06/trafic-de-dechets-electroniques-vers-lafrique-34-personnes-arretees-en-espagne/>

Case 10. Europe (mainly UK, Italy, Germany, France) to Turkey

Title	Turkey, Europe's new trash for plastic waste that is supposed to be recycled there
Date	27-5-2020
Type of waste	Plastic waste
Quantity/ Value	582,000 tonnes in 2019
Routes	Europe (mainly UK, Italy, Germany, France) to Turkey
Type of crimes/ Modus Operandi	Not proven to be illegal shipment but lack of control
Enforcement Action	NA
Criminal organisation	NA
Summary	The NGO Greenpeace warns of the exponential increase in exports of European plastic waste to Turkey, and its consequences for the environment.
For more information, please visit:	https://www.francetvinfo.fr/replay-radio/en-direct-du-monde/la-turquie-nouvelle-poubelle-de-leurope-pour-les-dechets-plastiques-qui-sont-censes-y-etre-recycles_3961483.html

Case 11. Romania – Malaysia – Indonesia

Title	1,800 tonnes of illegal toxic waste found abandoned in Malaysian port
Date	23-7-2020
Type of waste	Electric Arc Furnace Dust (EAFD), classified as toxic waste under the Basel Convention
Quantity/Value	110 containers containing 1,864 tonnes
Routes	From Romania, transit and seizure in Malaysia, destination was Indonesia
Type of crimes/ Modus Operandi	The Electric Arc Furnace Dust (toxic waste) was classified as concentrated zinc in declaration forms
Enforcement Action	The Malaysian Department of Environment (DOE) has contacted the Romanian Basel Convention authority to arrange the repatriation of the illegal waste shipment.
Criminal organisation	Unreported

Summary 110 containers of toxic electric arc furnace dust (EAFD) were found abandoned at Malaysia's Port of Tanjung Pelepas (PTP) last month. The discarded waste is of Romanian origin, and was bound for Indonesia, entering the country illegally.

For more information, please visit: <https://resource.co/article/1800-tonnes-illegal-toxic-waste-found-abandoned-malaysian-port>

Case 12. Croatia – Italy - Africa

Title Control actions for cross-border shipments of waste in June
Date 2-7-2020
Type of waste waste tyres
Quantity/Value 13,2 tonnes
Routes From Croatia to Italy with as final destination Africa

Type of crimes/ Modus Operandi Illegal shipment of waste

Enforcement Action Repatriation of shipment to country of destination, penalty for person who organized the shipment

Criminal organisation Unreported

Summary Illegal shipment of waste tyres (final destination was supposed to be Africa). Repatriation and alternative recovery of waste was agreed together with Croatian competent authority.

For more information, please visit: <https://www.gov.si/novice/2020-07-02-akcije-nadzora-cezmejnegaposiljanja-odpadkov-v-mesecu-juniju/>

Case 13. Slovenia to Italy

Title Control actions to prevent the negligent management of sanitary waste, in order to prevent the spread of COVID 19 virus and other diseases
Date 28-7-2020
Type of waste Non-listed waste
Quantity/ Value 20 tonnes
Routes Slovenia to Italy
Type of crimes/ Modus Operandi illegal shipment of waste

Enforcement Action Inspection and offence procedure pending

Criminal organisation	Unreported
Summary	Illegal shipment of waste sent from Slovenia to Italy because of inappropriate classification of waste (metals mixed with impurities such as earth, rubber, plastic) and consequently incorrect use of the procedure for cross-border shipment of waste.
For more information, please visit:	HTTPS://WWW.GOV.SI/NOVICE/2020-07-28-AKCIJE-NADZORA-ZA-PREPRECEVANJE-MALOMARNEGA-RAVNANJA-S-SANITARNIMI-ODPADKI-Z-NAMENOM-PREPRECITVE-SIRJENJA-VIRUSA-COVID-19-IN-DRUGIH-BOLEZNI/

Case 14. Netherlands - Belgium

Title	Order subject to penalty for Chemours to prevent a repeat EWSR violation
Date	1-4-2020
Type of waste	GenX waste
Routes	The Netherlands to Belgium
Quantity/ Value	Unreported
Type of crimes/ Modus Operandi	Export without the correct permit
Criminal organisation	One company
Enforcement action	Order subject to a penalty
Summary	A big chemical company has exported waste containing GenX to Belgium without applying for a new permit. Last year the company also exported GenX, while it should have had a separate permit not to contaminate other shipments. Therefore the inspection authorities are imposing an order subject to a penalty. This is a remedial sanction ordering a legal entity or natural person to do or not do something. The decision to impose an order subject to penalty specifies the deadline by which the offence or its consequences must be remedied, also referred to as the "compliance period". Failure to carry out the order or to carry it out by the specified deadline creates an obligation to pay a sum of money, also referred to as "forfeiture of a penalty".
For more information, please visit:	https://www.ilent.nl/onderwerpen/afvaltransport-evoa/nieuws/2020/04/01/last-onder-dwangsom-voor-chemours-om-herhaling-evoa-overtreding-te-voorkomen

Case 15. Italy

Title Environment: illicit trafficking of 'luxury' waste, 8 people arrested

Date 18/6/20

Type of waste Naval waste (waste from luxury ships destroyed during a huge storm)

Routes na

Quantity/ Value 670 tons of untracked waste (from 435 destroyed ships)

Type of crimes/ Modus Operandi organized illicit activities for the illicit trafficking of waste, illicit competition, threat and violent acts, attempted murder and illicit possession of firearms

Criminal organisation criminal group composed by entrepreneurs, lawyers and professionals in the nautical sector

Enforcement action 8 people arrested. Issued decree for preventive confiscation of 3.6 million of EUR

Summary The criminal group, made by individuals and companies working in the nautical sector, was responsible of organizing the transport, storage, management and illicit disposal of waste coming from the disruption of 435 ships during a violent storm that took place in the region Liguria, in Italy, back in october 2018. They had put in place a complex system of management and disposal of illicit waste, gaining almost 3 millions euro. A key role was played by a subject originally based in Naples, who involved representatives of Camorra and Ndrangheta to manage the entire illicit chain, with the final aim of penetrating the licit nautical sector in the north of Italy.

For more information, please visit: <https://www.lasiritide.it/out.php?articolo=17737>

Case 16. Italy

Title Waste, illicit trafficking discovered in Palermo. 5 people arrested, employees from RAP were also involved

Date 13/07/2020

Type of waste Bulky waste coming from housing-relocations activities

Routes na

Quantity/ Value 1000 tons

Type of crimes/ Modus Operandi Illicit trafficking, treatment and disposal

Criminal organisation Two criminal groups - involvement of organized crime (Sicilian mafia) and of public officers working in the waste collection/treatment municipal company

Enforcement action 5 people arrested, involvement of public workers from the waste-collection company

Summary The investigation started back in november 2018, after a reporting of illicit disposal of urban / bulky waste coming from relocation-related activities. The police discovered a well organized activity of collection, transport, treatment and finally illicit disposal of waste, hazardous and non-hazardous, made by two different criminal groups. All the activities were conducted without legal authorization, and the groups were able to use the dismantling tools of a public company thanks to the connivance of three public workers belonging to the company, now dismissed.

For more information, please visit: https://palermo.repubblica.it/cronaca/2020/07/13/news/rifiuti_scoperto_trafico_illecito_a_palermo_arresti_e_sequestri-261786045/

Case 17. Spain

Title 44 people arrested for irregularities in the management of Covid-related medical waste

Date 19/06/2020

Type of waste Medical waste

Quantity/Value na

Routes na

Enforcement Action 500 inspections in companies in charge of medical waste: 184 administrative infractions in the management, transport and disposal of medical waste, especially masks and gloves possibly infected by Covid

Type of crimes/ Illicit management and disposal

Modus

Operandi

Criminal organisation 300 companies inspected by Guardia Civil

Summary The investigation activities were part of the biggest operation Retrovirus coordinated by Europol. More than 500 inspections were conducted in Spain by Guardia Civil, and 184 infractions have been reported with regard to irregularities in the management, transport and disposal of medical waste mainly related to the Covid pandemia. These infractions are both dangerous for the pollution of the ecosystem and for the possible transmission of the virus.

For more information, please visit: <https://www.elperiodico.com/es/sociedad/20200619/operacion-guardia-civil-detenidos-irregularidades-empresas-gestion-residuos-sanitarios-coronavirus-8006089>

Annex III: IGO Enforcement Actions

Operation	RETROVIRUS
Organisation	EUROPOL, EnviCrimeNet and national authorities including the Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning
Date	27-7-2020
Summary	The joint RETROVIRUS operation is coordinated by EUROPOL in cooperation with the EnviCrimeNet network. In addition to the representatives of the Inspectorate for the Environment and Nature, representatives of the FURS and the Police also participate in operational joint inspections. Operation RETROVIRUS aims to prevent "inappropriate" / illegal collection, transport, management and management of sanitary waste (contrary to international, EU and national legislation and international conventions) for activities against the spread and treatment of the COVID epidemic 19.
Link	https://www.gov.si/novice/2020-07-02-akcije-nadzora-cezmejnega-posiljanja-odpadkov-v-mesecu-juniju/

Annex IV: Videos and documentaries

Title	Why is UK recycling being dumped by Turkish roadsides?
Organisation	Basel Action Network
Type of waste	Plastic
Date	26-6-2020
Summary	An investigation by BBC News has found that some plastic waste from Britain (160,000 tonnes) sent to Turkey for recycling is instead being dumped and burned on the side of roads. The UK sends more plastic waste to Turkey than to any other country, but critics say the country doesn't have the capacity to recycle its own waste, let alone the tens of thousands of tonnes being sent from overseas.
Link	https://www.bbc.com/news/av/uk-53181948/why-is-uk-recycling-being-dumped-by-turkish-roadsides
Title	Unauthorized landfills, full of Belgian waste dumped illegally, pollute French Lorraine
Organisation	France 2
Type of waste	Rubber and household waste
Date	25-6-2020
Summary	Several hundred tons of rubber and other household waste were dumped illegally in a dozen villages in Lorraine by a Belgian transporter at the request of a customer, a Belgian waste collection centre which believed to send its cargoes of waste to a French waste sorting centre, managed by a Lyon company, whose director says not being aware of such an agreement and denies having issued the delivery notes that he considers falsified. All these players were put in touch by an intermediary who admits having earned between "200 and 220,000 euros" with this transport of waste but denies having falsified the order forms and claims to have been the victim of another intermediary.
Link	https://www.demotivateur.fr/article/des-centaines-de-tonnes-de-dechets-illegaux-provenant-de-belgique-deverses-a-la-frontiere-francaise-21470