



Waste crime key features and main challenges

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for the Environment (ENPE)

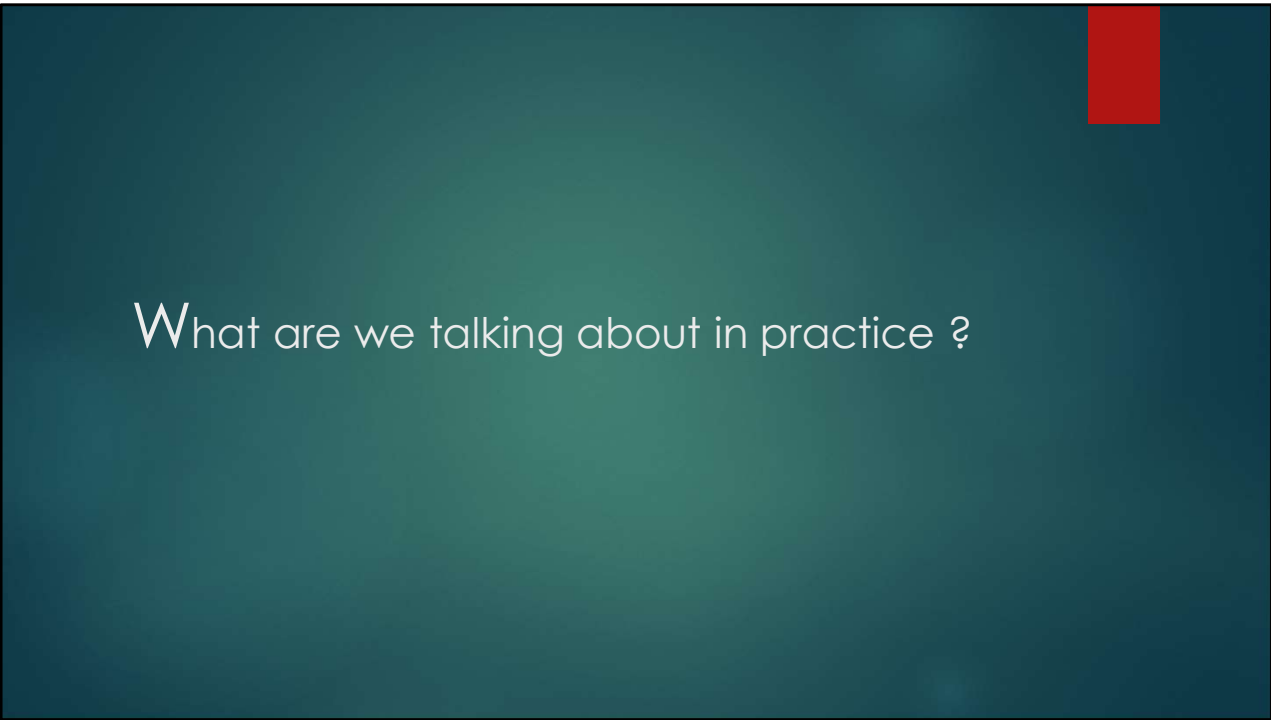


Piotr Nowak

General view

- Future depends upon how we manage the future of waste problem
- Ignoring or neglecting the challenges of waste, can lead to significant:
 - health
 - environmental
 - and economic consequences

Waste crime is a serious and growing threat to the quality of the environment, the integrity of ecosystems and human health. It challenges legitimate economies and the rule of law. As environmental legislation advances, requiring stricter pollution control measures, compliance costs increase.



What are we talking about in practice ?

This resulted in the waste industry becoming a sector of high economic importance where waste criminals -in an effort to reduce costs- exploit regional inequalities such as labour laws, weak environmental legislation and law enforcement capacity to displace their criminal activities where the risk of detention is lower.

Atacama desert in Chile - about 200.000 tons of clothes are dumped.

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Given that the waste sector is an un-level global playing field with asymmetries between countries in laws, politics, culture, knowledge and awareness, waste crime is a phenomenon of low risk and high profit, which is constantly increasing and expanding.

Dead whale with 30 kilograms plastic wastes in stomach contained - various types of rope, plastic bags, and a jerry can. Animal died from gastric shock because whale is unable to expel the plastics from body (Spain, 2018)



Waste crimes refers to the trade, treatment or disposal of waste in ways that breach international or domestic environmental legislation and cause harm or risk to the environment and human health.

Waste pollution consequences are related: Plastic in the ocean kills animals, biodiversity losses affect economy, waste in oceans affect tourism etc.



Polluted river in urban environment

Unauthorized waste activities often include dumping and disposal of waste without authorisation. Usually, illegal dumping is conducted by small number of persons who are knowledgeable in disposal and who ‘satisfy’ licensing standards. The offences are committed by systematically defrauding the waste generators by guaranteeing a service never actually provided. Indicative examples: dumping in isolated areas, storage in drums that dissolve over time, filling of unfilled landfills, and burning. In some instances, offenders also report that they made use of boreholes leading to abandoned mines, whereas others dumped the waste into convenient sewers or nearby

bodies of water and took advantage of the technological inadequacies and carelessness of inspectors



Dray river in India, New Delhi

Other types of unauthorised waste activities include burial of waste without authorisation, waste management without authorisation, mismanagement of waste or commercial activity with waste without authorisation.



Chemical factory,
Poland

Even the COVID-19 pandemic increased the plastic pollution

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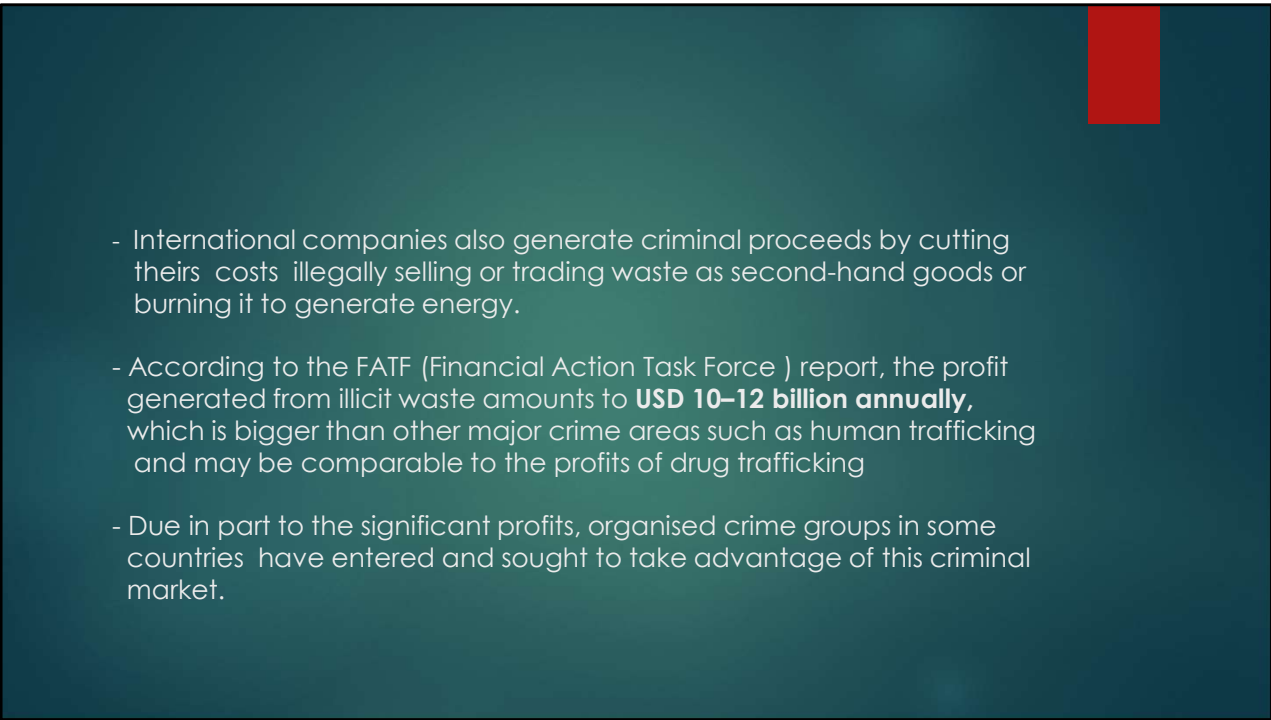


Numbers:

- 1.4 billion tonnes of food is produced each year to feed the world's 8 billion people population
- about 45 million metric tonnes of e-waste was generated in 2017, estimated value 20 billion USD
- the global waste market sector from collection to recycling estimated to be USD 410 billion a year (UNEP), excluding a large informal sector.



Waste crimes refers to the trade, treatment or disposal of waste in ways that breach international or domestic environmental legislation and cause harm or risk to the environment and human health. This can refer to administrative/regulatory violations (e.g. in case of non-compliance with license requirements) as well as breaches of criminal law (e.g. deliberately causing harm).

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- International companies also generate criminal proceeds by cutting their costs illegally selling or trading waste as second-hand goods or burning it to generate energy.
 - According to the FATF (Financial Action Task Force) report, the profit generated from illicit waste amounts to **USD 10–12 billion annually**, which is bigger than other major crime areas such as human trafficking and may be comparable to the profits of drug trafficking
 - Due in part to the significant profits, organised crime groups in some countries have entered and sought to take advantage of this criminal market.

Some waste materials are particularly vulnerable to waste crime, such as Waste electrical and electronic equipment (WEEEs), whereas there are some major waste destinations for each of them: China for plastic and paper, Ghana, Nigeria, Egypt, Somalia and Senegal for scrap cars and home appliances, Burkina Faso, Ghana, Senegal, China, India and Vietnam for WEEEs, Tunisia, India, Albania, Arab Emirates for textile waste.

Waste trafficking is still a high-profit and low-risk crime. Detection, investigations and prosecutions are rare, and penalties are rather low.

Unscrupulous companies wishing to take advantage of what is in effect a “**self-certification**” process may bribe public officials that issue waste management permits, or co-opt the relevant inspectors, customs agents and port officials into the trafficking scheme. Law enforcement officers may also lack the specialist knowledge and technical capacity to differentiate legal from illegal waste shipments.

From a wider enforcement point of view, it was stressed that it is both urgent and critical for environmental law enforcement officers to gain greater knowledge of money laundering and increase their technical capacity in asset tracing.

According to Interpol, environmental crime is a serious and growing international problem which includes both pollution-based crime and wildlife crime leading to serious, adverse effects on the planet, biodiversity and human life.

Waste crime is an environmental crime which exploits the physical features of waste, the complexity of the collection and downstream infrastructure and the market opportunities for profit. Given that waste crime is often regarded as victimless or unknown crime, in most cases it remains unreported or uncovered.

-Organised crime networks – often operate legitimate waste management companies makes it easy to hide the criminal origins of their funds

-Those who engage in both legal and illegal waste trade can easily mix the payment across the two business lines

► Tip – follow the money !!!



Waste crime is diverse as regards its *modus operandi*. It involves corporations who pollute more than their license allows for. It includes sub-standard treatment of waste. Sometimes criminal organizations are involved when they illegally trade or dump waste. They falsify documents and abuse legal commercial structures. Sometimes waste crimes also involves governments who fail to (effectively) regulate environmental issues.

- ▶ A follow-the-money approach to waste crime – i.e. systematically applying financial investigation techniques to trace illicit financial flows to reveal the kingpins behind criminal operation– has huge potential to support current enforcement efforts.
- ▶ The tools, capacity and awareness to investigate financial crimes related to waste trafficking, including corruption, are however lacking.
- ▶ environmental crimes generally are distressingly low on the priority list of law enforcement and financial intelligence units in most countries.

environmental crime is interconnected with other types of crime including corruption, tax evasion and money laundering while -due to its ‘high profit-low risk’ nature- is highly attractive for Organized Crime Groups (OCGs) especially in the field of illegal trafficking in waste

Securing documentation from involved company is crucial in the context of collecting full evidence

TIP - check compliance with law e.g.-

REGULATION (EC) No 1013/2006 OF THE
EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 14 June 2006 on shipments of waste



Article 1

Scope

1. This Regulation establishes procedures and control regimes for the shipment of waste, depending on the origin, destination and route of the shipment, the type of waste shipped and the type of treatment to be applied to the waste at its destination.
2. This Regulation shall apply to shipments of waste:
 - (a) between Member States, within the Community or with transit through third countries;
 - (b) imported into the Community from third countries;
 - (c) exported from the Community to third countries;
 - (d) in transit through the Community, on the way from and to third countries.

Waste Shipment Regulation (WSR)) implements in EU law the provisions of both the Basel Convention and the OECD Decision. In certain aspects, the WSR contains stricter control measures than the Basel Convention. The WSR requires Member States to ensure that shipments of waste and their treatment operations are managed in a manner that protects the environment and human health against any adverse effects that might result from such wastes. The WSR sets out control mechanisms for the export and import of waste between the EU and third countries, and for shipments between Member States.

For the purposes of this Regulation:

1. 'waste' is as defined in Article 1(1)(a) of Directive 2006/12/EC
2. 'hazardous waste' is as defined in Article 1(4) of Council Directive 91/689/EEC of 12 December 1991 on hazardous waste
3. 'mixture of wastes' means waste that results from an intentional or unintentional mixing of two or more different wastes and for which mixture no single entry exists in Annexes III, IIIB, IV and IVA. Waste shipped in a single shipment of wastes, consisting of two or more wastes, where each waste is separated, is not a mixture of wastes;
4. 'disposal' is as defined in Article 1(1)(e) of Directive 2006/12/EC;

It is important to note that a regulation — rather than a directive — was deemed necessary at that time in order to ensure simultaneous and harmonised application in all Member States. The choice of a regulation remains justified as it sets direct requirements for all operators, thus providing the necessary legal certainty and enforcement possibility of a fully integrated market across the EU. A regulation also ensures that the obligations are implemented at the same time and in the same way in all 27 Member States.

5. 'interim disposal' means disposal operations D 13 to D 15 as defined in Annex II A to Directive 2006/12/EC;
6. 'recovery' is as defined in Article 1(1)(f) of Directive 2006/12/EC;
7. 'interim recovery' means recovery operations R 12 and R 13 as defined in Annex II B to Directive 2006/12/EC;
8. 'environmentally sound management' means taking all practicable steps to ensure that waste is managed in a manner that will protect human health and the environment against adverse effects which may result from such waste;
8. 'producer' is anyone whose activities produce waste (original producer) and/or anyone who carries out preprocessing, mixing or other operations resulting in a change in the nature or composition of this waste (new producer) (as defined in Article 1(1)(b) of Directive 2006/12/EC)

the WSR establishes procedures and control regimes for the shipment of waste, depending on criteria based fundamentally on the type of waste shipped, the exporting State and the type of treatment to be applied to the waste at its destination, whether it is to be disposed of or recovered. Under the WSR, the Member States are permitted to adopt measures restricting shipments of particular waste between the Member States by way of implementation of the principles of proximity, priority for recovery and self-sufficiency

9. 'producer' is anyone whose activities produce waste (original producer) and/or anyone who carries out preprocessing, mixing or other operations resulting in a change in the nature or composition of this waste (new producer) (as defined in Article 1(1)(b) of Directive 2006/12/EC);
10. 'holder' is the producer of the waste or the natural or legal person who is in possession of it (and as defined in Article 1(1)(c) of Directive 2006/12/EC);
11. 'collector' is anyone carrying out waste collection as defined in Article 1(1)(g) of Directive 2006/12/EC;
12. 'dealer' is anyone who acts in the role of principal to purchase and subsequently sell waste, including such dealers who do not take physical possession of the waste, and as referred to in Article 12 of Directive 2006/12/EC;

The types of controls under the WSR depend on the characteristics of the waste (for example hazardous, non-hazardous), its destination, and its treatment as part of recovery (for example recycling) or disposal (for example landfilling) operations. The WSR also lays down export prohibitions for certain categories of waste and certain destinations: the most important example is the prohibition to export hazardous waste from the EU to non-OECD countries.

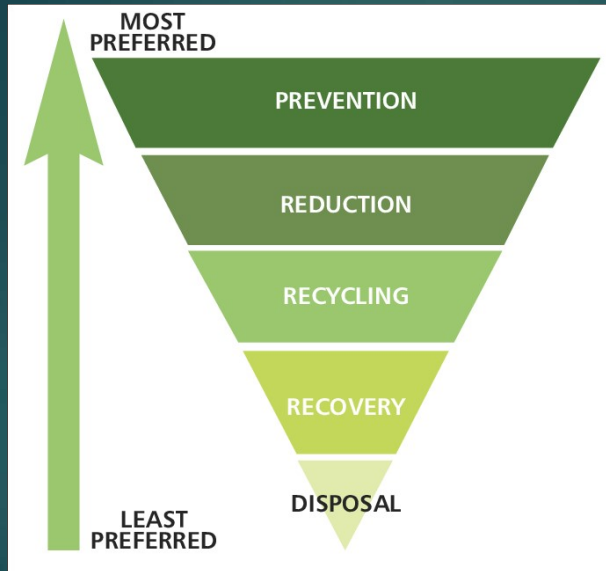
Waste

- exact size of the global illegal waste trade is unknown

Waste covers a very wide spectrum of discarded materials ranging from:

- municipal,
- electrical and electronic,
- industrial and agricultural,
- oil or liquid waste,
- to new types including pesticides, e-waste etc.

Following the OECD classification, the WSR divides waste into three categories according to the degree of hazard and, consequently, the control procedure to be followed in relation to it. Thus, Annex III to the WSR contains the green list, which covers waste regarded as presenting only negligible risks to human health and the environment during shipment. Such waste is, in principle, subject only to an information procedure. Annex IV to the WSR, referred to as the 'amber list', lists wastes which, since they present a risk to human health and the environment, are subject to a more restrictive procedure of prior written notification and consent. Lastly, Annex V to that regulation comprises an untitled list of the most hazardous wastes, which are subject to an export ban.



Solid Waste
Management
Hierarchy

Solid Waste Management Hierarchy

Waste is ugly but recycling is the proper way



What is waste?

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- Most **complex question** is whether a certain substance or object is waste.
- Modern technologies allow to move waste back into the production or consumption chain.
- Waste can have positive value, such as paper, plastic or metal, can rejoin the value chain and be a source for new products

General definition

Article 2.1 of the Basel Convention defines wastes:

as substances or objects that are disposed of or are intended to be disposed of or are required to be disposed of by the provisions of national law.

The objective of the Basel Convention is to protect human health and the environment against the adverse effects of hazardous wastes. The scope of application of the Basel Convention covers a wide range of wastes defined as “hazardous wastes” based on their origin and/or composition and their characteristics, as well as household waste and incinerator ash. The Basel Convention is not the only piece of international law relevant for the EU waste policy. For example, the EU promotes adoption of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and helps launch negotiations on landmark global agreement on plastic pollution.

Ways of protecting the environment:

- criminal law
- environmental code
- environmental administrative



The official policy of the EU puts a strong emphasis on stimulating the use of criminal enforcement and – at the same time – aims at strengthening enforcement systems that rely strongly on administrative enforcement. The Member States, by transposing the Environmental Crime Directive have to attach to the existing prohibitions some criminal sanctions. Very often, they keep a combination of criminal and administrative punishment which should achieve that only the offenders who commit the most severe and harmful violations should be criminally prosecuted, while less serious offences can be dealt with using administrative enforcement.

Key points:

- Generally relationship between administrative and environmental criminal law is referred to as the administrative dependence of environmental criminal law.
- Legal interest of the environment is in many legal systems not directly protected through the criminal law.
- Violation of administrative norms (for example a condition of a permit) can be sanctioned by criminal law

Not every breach of a legal obligation constitutes a criminal act. Whether an unlawful act can be considered a crime, depends on domestic legislation and the specific circumstance of the individual case. The criterion according to which the legislator usually differentiates between administrative and criminal sanctions is the seriousness or gravity of the attack and the degree of damage or endangerment.

	Criminal Code	Environmental Code	Environmental administrative
France	★	★	
Poland	★	★	★
Italy	★	★	
Germany	★		★
Spain	★		★
Sweden		★	
United Kingdom		★	

Legislation in the numerous Member States provides a range of administrative fines, depending mainly on the severity of the offence and its effect on the environment. The additional administrative measures include restriction, suspension or prohibition/ban of the activity; cancellation of the licence or restriction of its terms; seizure of tools, machinery and equipment; suspension of the right to obtain subsidies or other benefits issued by national or European public authorities or services; loss of tax benefits, credit benefits and credit financing acquired prior to the offence; imposition of rectification or corrective measures on the operator; closure of the

installation concerned etc.

As you can see:

- ✓ Five countries (France, Germany, Italy, Poland and Spain) incorporated criminal law into their criminal codes (Poland and German also made incorporation into the **primary criminal law** demonstrates that environmental crime is treated as serious criminal act),
- ✓ Some countries have an explicit administrative sanctioning system. for example:
 - Spain outside of its criminal code only has administrative sanctions.
 - Germany has not only criminal sanctions in the criminal code and in environmental statutes, but also (administrative violations) in administrative statutes.
 - UK an different position has been taken by the UK which traditionally is averse to codification and hence has neither a criminal code nor an environmental code. Criminal provisions in the UK are fragmented and spread throughout several statutes.

Many countries such as Germany, Denmark, Austria or the Czech Republic apply comprehensive legislation detailing administrative sanctions for environmental offences, alongside criminal penalties. Even several European countries that predominantly relied on criminal enforcement in the past recently moved towards more administrative enforcement. The overall picture emerging from these developments is a move towards combined criminal-administrative enforcement systems. This is in line with several policy papers, which argue that, in practice, exclusive reliance on criminal enforcement is not the most cost-effective path for environmental

regulation enforcement.

Article 288

CONSOLIDATED VERSION OF THE TREATY ON THE FUNCTIONING OF THE
EUROPEAN UNION, THE LEGAL ACTS OF THE UNION

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To exercise the Union's competences, the institutions shall adopt regulations, directives, decisions, recommendations and opinions.

- ✓ **A regulation-** shall have general application. It shall be binding in its entirety and directly applicable in all Member States.
- ✓ **A directive** shall be binding, as to the result to be achieved, upon each Member State to which it is addressed, but shall leave to the national authorities the choice of form and methods.
- ✓ **A decision** shall be binding in its entirety. A decision which specifies those to whom it is addressed shall be binding only on them.
- ✓ **Recommendations and opinions** shall have no binding force.

Directive 2008/99/EC of the European Parliament and of the Council on the protection of the environment through criminal law.

- ▶ This Directive lays down the principles to be followed by Member States in the field of environmental criminal law. The aim is to achieve the effective protection of the environment through more dissuasive penalties for environmentally harmful activities, which typically cause or are likely to cause substantial damage to the air, including the stratosphere, to soil, water, animals or plants, including to the conservation of species.
- ▶ This Directive has been implemented by:

Under the Directive nine environmental crimes are considered as criminal offences, when unlawful and committed intentionally or with at least serious negligence (Article 3) or in cases of inciting, aiding and abetting the intentional conduct referred to in Article 3 (Article 4).

- ▶ Water Supply (Water Quality) (Amendment) Regulations (Northern Ireland) 2009 (S.R. No. 246 of 2009). Legislation | **United Kingdom** | **2009**
- ▶ Act amending the Electricity Act, Natural Gas Supply Act, Heat Supply Act and various other laws, repealing the Act on the use of renewable energy sources (No. 622 of 2010). | **Denmark** | **2010**
- ▶ Legislative Decree No. 121 implementing Directive 2008/99/EC on the protection of the environment through criminal law as well as Directive 2005/35/EC on ship-source pollution and on the introduction of penalties for infringements. Legislation | Italy | 2011
- ▶ Crimes Against the Environment Act. | **Malta** | **2012**
- ▶ Ordonnance relative à la mise en conformité de la législation environnementale avec la Directive 2008/99/CE relative à la protection de l'environnement par le droit pénal. Legislation | **Belgium** | **2012**
- ▶ Act on Promotion of Renewable Energy (No. 1330 of 2013). Legislation | Denmark | 2013
- ▶ Law No. 4042 on the protection of the environment through criminal law, on waste management and other provisions, in compliance with EU Directives 2008/99/EC and 2008/98/EC. Legislation | **Greece** | **2012**
- ▶ Act amending the Waste Disposal Act. Legislation | **Germany** | **2016**

Article 3 of the ECD on the offences foresees "Member States shall ensure that the following conduct constitutes a criminal offence, when committed intentionally or with at least serious negligence

- (a) **the discharge, emission or introduction of a quantity of materials or ionising radiation** into air, soil or water, which causes death or serious injury to any person;
- (b) **the unlawful discharge, emission or introduction of a quantity of materials or ionising radiation into air, soil or water**, which causes or is likely to cause death or serious injury to any person or substantial damage to the quality of air, soil, water, animals or plants;
- (c) **the unlawful treatment, including disposal and storage, transport, export or import of waste, including hazardous waste**, which causes or is likely to cause death or serious injury to any person or substantial damage to the quality of air, soil, water, animals or plants;
- (d) **the unlawful operation of a plant** in which a dangerous activity is carried out or in which dangerous substances or preparations are stored or used and which, outside the plant, causes or is likely to cause death or serious injury to any person or substantial damage to the quality of air, soil, water, animals or plants;
- (e) **the illegal shipment of waste as defined in Article 2(35) of Regulation (EC) No 1013/2006** of the European Parliament and Council⁶ for profit and in a non-negligible quantity, whether the shipment is executed in a single operation or in several operations which appear to be linked;
- (f) **the unlawful manufacture, treatment, storage, use, transport, export or import of nuclear materials or other hazardous radioactive substances** which causes or is likely to cause death or serious injury to any person or substantial damage to the quality of air, soil, water, animals or plants;
- (g) **the unlawful possession, taking, damaging, killing or trading of or in specimens of protected wild fauna and flora species** or parts or derivatives thereof;
- (h) **the unlawful significant deterioration of a protected habitat;**
- (i) **the unlawful trade in or use of ozone-depleting substances.**

Most of these environmental crimes include the condition of causing death or serious injury or harm to persons or the environment. In these cases, the (non-)action alone is not considered to be a criminal offence. This aforementioned enumeration confirms that ‘environmental crime’ is a broad concept encompassing very different conducts, and not all of them are included Article 3. For instance, crimes concerning food safety or animal welfare are not addressed in the Directive.

Conclusions:

- ▶ Regulatory level: Every Member State has developed its own adaptation to the ECD requirements.
- ▶ Defines environmental offences that Member States must criminalise
- ▶ Most serious infringements of environmental acts (intentional or seriously negligent behaviour)
- ▶ EU legal acts set out in the Annexes

The Directive does not remove the practical problem that the mere decision to criminalize has no influence either on decisions of public prosecutors to dismiss particular cases of environmental crime, or on the discretionary powers of the judge to choose the applicable sanctions.

- Illegal transboundary movements of hazardous wastes and other wastes from developed countries to developing countries have become global concern
- The Basel, Conventions provide the legal tool of global efforts in tracking and managing hazardous waste



The objective of the Basel Convention is to protect human health and the environment against the adverse effects of hazardous wastes. The scope of application of the Basel Convention covers a wide range of wastes defined as “hazardous wastes” based on their origin and/or composition and their characteristics, as well as household waste and incinerator ash. The Basel Convention is not the only piece of international law relevant for the EU waste policy. For example, the EU promotes adoption of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and helps launch negotiations on

landmark global agreement on plastic pollution.

The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

- was adopted in 1989 and it came into force in 1992
- most comprehensive global environmental agreement on hazardous wastes and other wastes



The EU's environmental policy operates within a complex international legal framework, which is quite constrained by the Basel Convention on the Control of Transboundary Movement of Hazardous Waste and Disposal of 22 March 1989.

- ▶ Basel Convention allows the Parties to define the
- ▶ wastes in addition to the waste lists under the Convention,
- ▶ right of the Parties to adopt their own
- ▶ national legislation to prevent and control of hazardous
- ▶ wastes and other wastes (Article 3.1 and Article 4.1).

Exports of waste from the EU to third-countries and for the purpose of the disposal of such waste are prohibited, except to EFTA countries which are also parties to the Basel Convention and which do not prevent such imports (Article 34). Exports of waste destined for recovery are generally possible if the concerned waste is on the “green list”, and subject to prior consultation with the country of destination (Article 37).

Exports of hazardous wastes on the “red” and “orange” lists destined to be recovered are prohibited, especially to countries which do not apply the OECD Decision C(2001)107/Final on control of transboundary movements of waste intended for the recovery operation. Exports to countries which do apply this OECD Decision are possible for particular wastes on the “green” and “orange” lists (Article 36). Exports of waste to the Antarctic are prohibited (Article 39), as well as to overseas countries or territories, with some derogations in the case of recovery (Article 40).

How waste should be legally transported between countries ?

Remember that - Violation of the administrative law may result in criminal liability

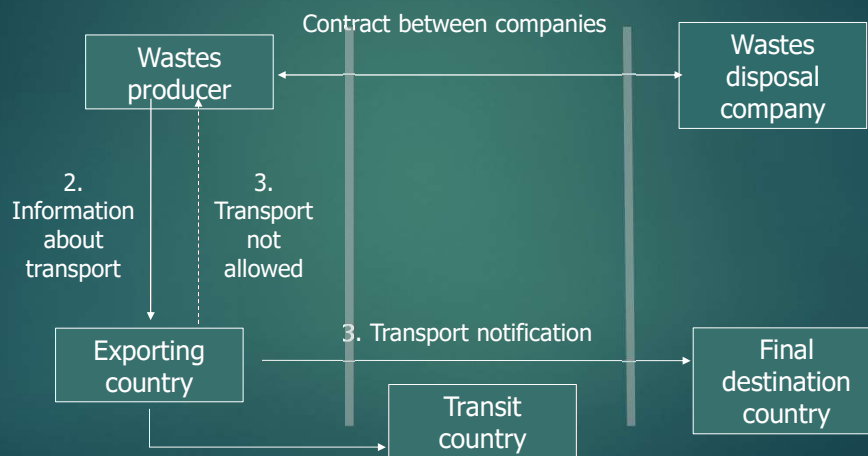
Standard procedure

- ▶ Stage 1 Notification
- ▶ Stage 2 Consent and issuing transport documents
- ▶ Stage 3 Cross-border waste movement and confirmation of neutralization/use wastes

The Basel Convention applies when waste is transported from an area under the national jurisdiction of a State party thereto to an area under the national jurisdiction of another State party thereto. The latter classifies waste according to its possible adverse impact on health and the environment into three lists, green, orange and red; this classification determines the rules applicable to waste transfers within the EU as well as to third countries.

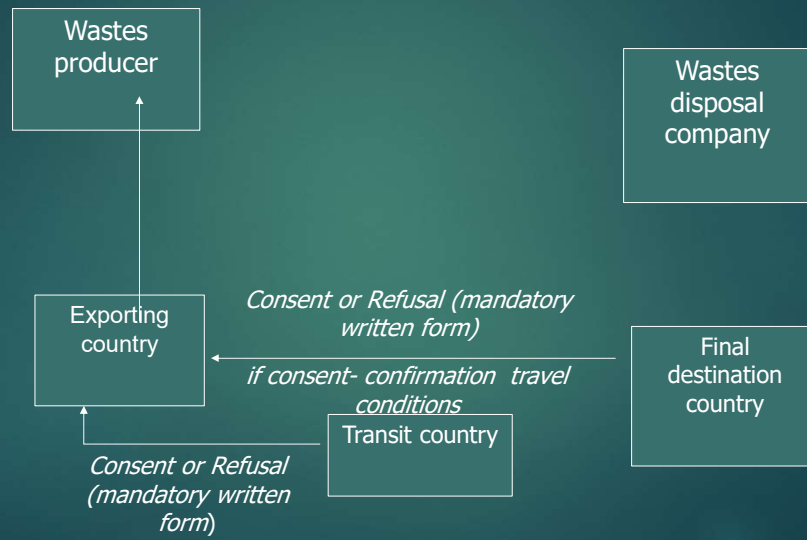
Stage 1 Notifiication

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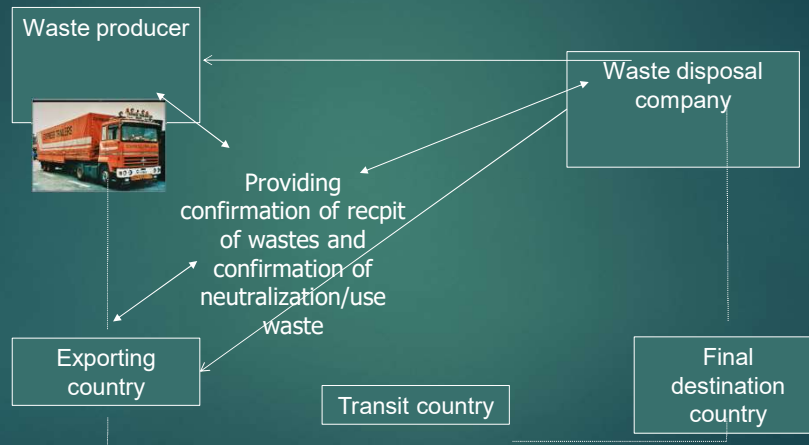
Stage 2 Consent and issuing transport documents

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Stage 3 Transboundary move of hazardous wastes and confirmation of neutralization/use wastes

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Let's stop for the moment

Interpol

-Tracing and Management System



- Facial recognition



Interpol manages 19 police databases with information on crimes and criminals (from names and fingerprints to stolen passports), accessible in real-time to countries, and offers investigative support such as forensics, analysis, and assistance in locating fugitives around the world.

More information:

1. Control procedures

<http://www.basel.int/Portals/4/Basel%20Convention/docs/pub/leaflets/leaflet-control-procedures-en.pdf>

2. Guide and instructions

<http://www.basel.int/Portals/4/Basel%20Convention/docs/pub/instruct.doc>

3. Harmonization of applicable documents and procedures

<http://www.basel.int/Procedures/NotificationMovementDocuments/tabid/1327/Default.aspx>

4. Recommendations on the prosecution of cross-border waste crimes (UNEP/CHW.10/12/Add.1)

<http://www.basel.int/TheConvention/ConferenceofthePartiesCOP/MeetingsandDocuments/tabid/2409/Default.aspx>



DSN-1462



Method of packaging - improper packaging proves that it is in fact waste

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Rules for verifying items - waste/usable - 3 basic steps

1. usability test - the actual efficiency of each item should be verified,
2. documentation of the test - the test protocol should be attached to each item with an indication of the entity that conducted the test and its type.
3. method of packaging - improper packaging proves that it is in fact waste

Irregular documentation

- Missing documents (i.e. identification documents, travel documents, authorisations) or lack of a permit.
- Incomplete paperwork and administrative errors.
- False declaration of waste types (including misclassification and partial declaration).
- False declaration of waste as non-waste or not declared at all. Indicatively, toxic sludge passed as an agricultural fertilizer.

- Mislabelling and forged documents.

ATLANTIC SHIPPING COMPANY (UK) LTD

Confirmed Booking Confirmation Page 1 Of 3

RATES IN ACCORDANCE WITH THE QUOTE/SPECIAL AGREEMENT NUMBER SHOWN

To: Natalio [REDACTED] Booking Party: FREIGHT AGENCY LIMITED
 From: [REDACTED] Address: 15-17 Northgate, Baldon
 User: WEST_AFRICA Bradford
 Trade: [REDACTED] Tel Number: 01274 650 040
 Booking Number: BP0363991 Created Date: 26/01/11 UCR: 1gb500444205000-e52757 Quote Ref: sc08wa00093



Thank you for your booking.

Any discrepancies must be advised to Mediterranean Shipping Co (UK) Ltd immediately on receipt. Failure to do so could lead to substantial extra costs for the account of the cargo or may result in the cargo being short shipped.

Amendments or cancellations to the issued booking may incur additional charges. A minimum of 21 days notice is required, however for most dry bulk, the amendment / cancellation must be made prior to 10 days in the dry bulk loading / unloading period (for cargo 21 days notice for most). Special equipment requires a minimum of 45 days notice.

Important - Costs incurred for vessel journey / repositioning will be for the account of the booking party.

For cargo loading at a UK loading point, the free time period is 3 hours. Thereafter, the vehicle detention charge is calculated at GBP 45 per hour, or part thereof.

In accordance with our Standard Tariffs and Conditions, which are shown in item 11. All booking terms are shown clearly at the bottom of the booking and further clarification is available from MISC UK's Head Office (Legal Department).

Voyage Details		Load Agency Name:	
Vessel:	GRAND VISION	Load Port Agent:	
Voy:	GA	Fac:	
POI:	Felstons		
POD:	Tinian, agos		
ETS:	06/02/11		

Container Details	POI	Quantity	Size/Type	Fumigation Req?	Weight	HAZ Details
Felstons		1	40HC	N	20000.000	

Description used tested electricals

CLAUSES
 Electricals Booking
 MISC accepts booking of Used Electricals on the understanding the following criteria is met:
 The Electricals must be packed and loaded in line with ICA Regulations.
 The Electricals must be packed and loaded in line with ICA Regulations.
 The Electricals must be packed and loaded in line with ICA Regulations.

Intermodal Details and Information
 Address No: 4247041 Job No: 2314497 Size/Type: 40HC Weight: 20000.000 Appointment: 04/02/11 14:00:00
 Load ref n/a mbot - VIP

Collection Address Details

Printed By User: Browne

Mediterranean Shipping Company (UK) Ltd Registered Office: 15 The Hemmes, South, Suffolk, IP5 8SL
 Registered in England No. 12345678

Illegal exports and imports of waste

- Lack of required treatment of waste for import or export. Indicatively, valid license for plastics waste import but the stock at stake is contaminated with chemicals substances which cannot be recycled or reused.
- Online illegal waste trade.
- Breach of import and export bans (i.e. exports of used goods without notification).

SGS jobfile reference number:
CST 146440/1
Location: Felixstowe Docks

WEEE Inspection

Page. 11 of 22

Date: 19/5/11

Possible decisions: 1-Working
2-Repairable at reasonable cost
3-Repairable at unreasonable cost
4-Beyond viable repair
5- Other

Inspector	FH		
Item Number	10		
Container reference No:	4		
Description of item	JVC STEREO		
Model Number	UX D88		
Serial Number	—		
PAT test 1 / 2 P / F			
Photos checked. Ref. No of photo on camera	Full device ✓	Rating label	Damage
Comments	No volume control Tape OK, No CD control Speakers soaking wet		
Decision 1-5	3		
	Wrapping wet Unit wet No PAT		

Thank you for your attention

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email piotr.nowak@szczecin.po.gov.pl,
sources: Council of Europe, EJM, Eurojust, ENPE, Europol, OLAF, IMPEL, Basel Convention info