Strengthening Border Control Activities for Combating Illegal Traffic in Thailand

24 November 2015

Pattarapon Limpakdee

Industrial Waste Management Bureau
Department of Industrial Works
Ministry of Industry

Problem experienced (to be discussed) In Thailand, prosecution is apparently difficult

<u>Case I</u>: Importers' liability/ Government burden in relation to Customs regulations

<u>Case II</u>: Exporter's liability/ Government burden in relation to Customs regulations

<u>Case III</u>: Exportation/ Importation of EAFD for recycling still necessary (Recycling facilities require economy of scale)

<u>Case IV</u>: Common rules for Metal Scraps do not exist ; burden to exporters/importers

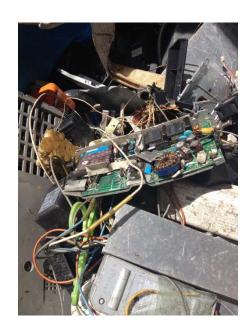
1. Illegal shipment from Japan to Thailand

28 August 2014 : - Investigated suspected 7 containers at Laem Chabang Port

- Declared as "mixed metal scrap: steel, copper and aluminum"
- Founded "Scraped EEEs"







1. Illegal shipment from Japan to Thailand

21 October 2014 : - Visited and Inspected importer: Long Bee Product Co., Ltd.

- Holding a factory license type 105 under the Factory Act B.E.2535
- Permitted for segregation of non-hazardous industrial waste specially for paper, plastic, wood and metal scraps







1. Illegal shipment from Japan to Thailand

3 December 2014: Officially informed Office of Waste Disposal Management,
 Ministry of the Environment, Competent Authority of Japan

• 19 November 2015: Cooperate with Customs, Importer, intended carrier and port officer to take containers back to Japan.

- 14 July 2011: Inspectorate of Housing, Spatial Planning and the Environment,
 Ministry of Infrastructure and the Environment (Competent Authority
 of the Netherlands) officially informed the illegal shipment from Thailand
 to the Netherlands
 - Declared as "stainless steel 304 grade solid scrap for melting"
 - Founded "black powder"



August 2011: - Visited and inspected exporter (factory license

type 64(11) for metal compression)

- Checking export data

24 April 2012: - Accusation (issued case to Natural Resources and

Environmental Crime Suppression Division)

5 February 2015: - Set up special task force (under Thailand's sub-

committee of Basel Convention)

28 May 2015 : - Assigned Minister Counsellor, Office of Industrial

Affairs, Austria for waste collection

22-23 September 2015: - Waste sampling at Winschoten, the Netherlands

- Document certified

Waste sampling







Waste sampling

















3. Import & Export of EAFD

- Electric Arc Furnace Dust (EAFD) is industrial waste generated in the collection of particulate material during steelmaking process via electric arc furnace
- Controlled by 1. Basel Convention (A1020 and A4100)
 - 2. Hazardous Substance Act B.E.2535 (list 5.2 No.2.2 and 5.10)
 - 3. Factory Act B.E.2535 (waste code 10 02 07)
- Problem: declared as zinc concentrate, zinc oxide or zinc dust (non-basel)
- 46 containers (2,000 tons) was investigated and seized by customs (2012-2015)







Classified as 3 types

1. Clean metal scrap





2. Mixed metal scrap



3. Contaminated metal scrap





<u>Example of US non-ferrous scrap specifications</u> <u>following Bulletin's International Scrap Directory</u>

1. Twitch: Fragmentizer Aluminum Scrap (from Automotive Shredders). The material, as received, must be dry and not to contain more than 3% maximum free zinc, 1% maximum free magnesium, and 1.5% maximum free iron and stainless. Not to contain more than a total 5% maximum of non-metallics, of which no more than 1% shall be rubber and plastics

2. Zorba: Recyclable Concentrates of Shredded Mixed Non-ferrous Scrap Metal in Pieces Derived from Fragmentizers for Further Separation for Contained Materials. Shall be made up of a combination of nonferrous metals: aluminum, copper, lead, magnesium, stainless steel, nickel, tin, and zinc, in elemental of alloyed (Solid) form

<u>Problem</u>: Declared as specific material

Founded as mixed material, contaminated material or E-waste

Criterion for importation metal scrap to Thailand

- 1. Metal material scrap and metal alloy scrap including dispersible form which containing oil and grease more than 2% and combustible material more than 5%
- 2. Industrial product namely generator, adaptor, machinery, motor and wire which contaminated with PCB, PCT or electrical/ electronic assemblies including printed circuit board with accumulator, battery, mercury switches, glass from cathode-ray tubes and other activated glass and PCB-capacitor

Thank You Q&A