



UNODC
United Nations Office on Drugs and Crime



Funded by
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In cooperation with

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programme

Unwaste

Tackling waste trafficking to support a circular economy



Unwaste





Unwaste project objectives



1. To better understand waste flows between Europe and Southeast Asia, with an additional focus on the COVID-19 pandemic's impact on healthcare and hazardous waste movements



2. To promote cooperation through national dialogues to combat illicit movements of waste from the EU towards Southeast Asia



3. To facilitate intra and inter-regional dialogues at the policy level to promote partnership between the EU and Southeast Asian nations, in support of the circular economy approach





Project timeline

Year 1: AUG 2021 – JUL 2022

Year 2: AUG 2022 - JUL 2023

Year 3: AUG 2023 - JUL 2024

INCEPTION

AUG-OCT2021

IMPLEMENTATION: NOV 2021 - 2024



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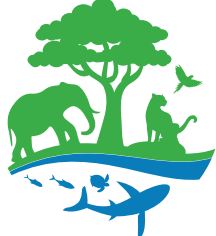
Project highlights (2022-2023)



- International and regional presence (BRS COP, ENFORCE, WCO Operation Demeter, OEWGCW, WTO, etc)
- Interagency cooperation: engagement with multiple government agencies from countries in Southeast Asia: 6 national consultations and 2 national inter-agency study visits
- Inter-regional cooperation: Study tour in the EU, with 16 delegates from SEA countries (2022, 2024)
- Quarterly bulletins – 6 editions (*Unwaste* Trendspotting alert) – used by Customs in different countries for risk profiling
- Expert Consultations with regional and global stakeholders
- Unwaste report series: publication Q1 2024
 - Response to waste trafficking in Southeast Asia countries (“Turning the tide [...]”)
 - Mapping of legal and illegal trade from Europe to SEA
 - Regulatory framework analysis for the 10 ASEAN countries (UNEP)
 - Role of corruption, money laundering, and organized crime networks in waste trafficking
 - Use of online platforms for waste trafficking

Paper on the threats of waste trafficking to a circular economy transition; Criminal and administrative remedies to waste trafficking (UNEP – Q2 2024)

- ETC









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United Nations Institute for Training and Research



This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of the UNODC team under the Unwaste project and do not necessarily reflect the views of the European Union nor the United Nations Secretariat.

Bulletin No. 1 - July 2022



Despite waste trade bans and restrictions put in place in the past years in Southeast Asia, problematic waste still reaches countries in the region.

It is estimated that the illegal waste shipments within the European Union and between third countries and the EU represent 15–30 per cent of the total EU waste trade, generating 9.5 billion euros in annual revenue from the illicit waste market in the EU alone [1]. There are documented instances in Southeast Asia in which the waste imported illegally ends up in illegal landfills and illegal storage sites or is burned in the open.

In a communication regarding the new proposed regulation on waste shipments, the European Commission mentioned that organized crime is involved in the illegal waste trade through legitimate business structures. Also, an INTERPOL report shows how criminal networks adapted to new legislation related to plastic waste and have diversified their illegal activities across different countries [2].

To respond to the illicit trade in waste, Southeast Asian governments have put in place bans, restrictions and new regulations while increasing control of imported waste. Malaysia, Thailand, Indonesia and Viet Nam are among the countries in the region that are proactive on this front. While many challenges remain, much progress has been achieved in the region towards reducing the influx of illicit waste.

The *Unwaste* Trendspotting Alert is a series of quarterly bulletins aimed at showing the trends in the waste trade from the EU to Southeast Asia and highlighting case studies on waste trafficking and new measures to combat illicit waste flows. For this first edition, the four focus countries are Malaysia, Indonesia, Thailand and Viet Nam.



Tackling waste trafficking to support a circular economy

FOCUS COUNTRIES: MALAYSIA, INDONESIA, THAILAND, VIET NAM

Main waste flows reaching the ASEAN region

Based on sources initially assessed [3] for this *Unwaste* Trendspotting Alert No.1, the top waste streams for importing into the ASEAN region are:

PAPER AND PAPERBOARD

PLASTICS

E-WASTE

METAL

Legal and illegal waste flows

Analysing the legal waste trade in the four focus countries is essential to better understand the main driving factors and modus operandi for both legal and illegal imports and exports of different types of waste. This is because uncontrolled and illicit flows are often hidden behind controlled or legal transboundary movements. The boundaries between the licit and illicit activities in the trafficking of waste can be thin, and the activities, actors and modus operandi involved often overlap and fuel each other.

PAPER AND PAPERBOARD ON THE RISE

Paper and paperboard are certainly one of the emerging and most challenging waste streams affecting the ASEAN region since the China ban. The following graph shows how imports into the ASEAN region have drastically increased, from almost 6 million Mt in 2017 to more than 13 million Mt in 2021.

Paper and cardboard waste imports in ASEAN 2017-2021 by quantity (Tons)



Viet Nam and Indonesia are the most affected countries: Viet Nam more than doubled the quantity of imported paper and paperboard, from 1.8 kt in 2017 to more than 4 kt in 2021. Indonesia increased from 2.2 kt in 2017 to 3.4 kt in 2021.

Source: Trade Map
*aggregated data for ASEAN not available for 2018

PLASTIC – IMPACTS OF PLASTIC WASTE AMENDMENT... OR NOT?

The challenges related to imports and exports and the environmentally sound management of plastics are well known. In general, there is a level of uncertainty about what happens with plastic waste once it reaches the destination countries, as there is no traceability system in place. Concerns are that a big portion of unrecyclable, mixed or hard-to-recycle plastics end up in dumpsites and landfills or are burned in the open. The ASEAN region has been particularly affected since the China Ban took effect in 2018. The trends are also showing how regulatory measures are impacting the waste flows.

The following graph illustrates the increase in imports in 2018, immediately after the new regulations came into force in China. Overall in the ASEAN region, the import of plastics from the rest of the world almost doubled in one year, jumping from 1 million Mt in 2017 to more than 1.9 million Mt in 2018. Following the regulatory and enforcement measures put in place by countries of destination, the overall amount started to decrease in 2019.

Quarterly bulletins

- Research core team
- Monitoring media & policy developments
- Case studies
- Basel Convention developments
- Publication: quarterly basis
- [LINK](#)





Tackling waste trafficking to support a circular economy



Thailand



Indonesia



Vietnam

National dialogues

- Identify adequate cooperation mechanisms between regulatory agencies, enforcement and criminal justice institutions.
- Examine existing policies on import, export, and management of waste and provide recommendations for reforms or development of new country strategies.
- Suggestions to enhance domestic & intra/inter-regional cooperation.
- Review and provide guidance for project's annual work plan.



Malaysia



Basel Convention-related challenges

- Failure to apply the **Prior Informed Consent (PIC) procedure** by some exporting countries - prevent importing countries from accessing information that they need to control and screen the importation of potentially hazardous or illegal waste
- **National regulations** in the destination countries are not known or applied by exporters in the countries of origin
- **Take-back procedure** – long, costly, challenging, and in some cases the countries of origin do not take back the waste
- Cost of unclaimed containers' storage, demurrage, destruction, and/or repatriation is very high

Governments in SEA countries put in place deposit schemes and additional approval measures for companies exporting waste to their country
e.g.: Viet Nam's "environmental protection deposit" in 2022



Efficient implementation of the Basel Convention

- Structured take-back process
- Exporting countries should strengthen their compliance with the Prior Informed Consent procedure and import permit requirements as required by the destination countries
- Facilitate information exchange, coordinate efforts, and ensure compliance with the Basel Convention's requirements, dedicated communication platforms should be established/improved/used more efficiently
- Deposit policies should be introduced to cover the costs of storage and demurrage when suspicious shipments are stuck at ports.



Challenges Due to Insufficient Data & Information Sharing

Delays prompt responses to illegal activities

- prevents authorities from understanding routes used by traffickers and modus operandi employed

Lack of detailed information on exporting companies complicates:

- Background checks
- Legal proceedings
- Repatriation efforts
- Companies / entities involved often become untraceable

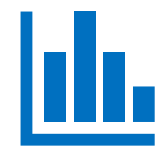
Data sharing is essential for establishing waste trafficking trends and tailoring anti-trafficking policies



Data: recommendations



- Collaborative data-sharing between importing and exporting countries - the origins, destination, transit points, types of infringements and methods used to traffic waste across borders



- Harmonizing data, definitions and the categorization of relevant commodities among different agencies and countries



- Comprehensive data management systems and monitoring mechanisms to track the outcomes and effectiveness of waste crime cases need to be increased





Genoa port



Brussels

Study tour – Oct 2022



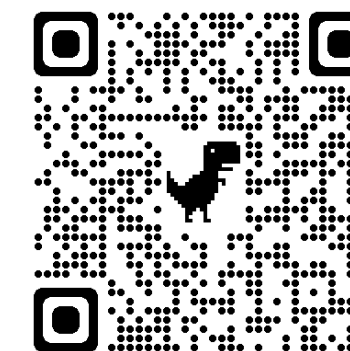
Objectives

- Discuss with the relevant EU stakeholders the existing challenges and constraints related to waste trafficking
- Propose collective measures and make recommendations
- Start building a transparent partnership among all parties
- Identify gaps and opportunities for improvement in policies/strategies that *Unwaste* can contribute to addressing.





Unwaste WEB PAGE



WEB PLATFORM

[Waste Enforcement Asia community](#)



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