



Operation 30 Days of Action

Final report



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ACRONYMS

ENS	INTERPOL's Environmental Security Programme
IMPEL	European Union Network for the Implementation and Enforcement of Environmental Law
NCB	National Central Bureau
NOC	National Operational Coordinator
NOP	National Operational Planning
ORT	Operational Reporting Template
PCWG	Pollution Crime Working Group
RIACM	Regional Investigative and Analytical Case Meeting
RILO-AP	Regional Intelligence Liaison Office in the Asia-Pacific region
UN-REN	Regional Enforcement Network on Chemicals and Waste Project of the United Nations Environmental Programme
WCO	World Customs Organization

1. INTRODUCTION

Operation 30 Days of Action was a globally-coordinated, country-led enforcement operation tackling illegal disposal of and illicit trade in hazardous waste, running from 1-30 June 2017. With police, customs, border and environmental agencies from 43 countries worldwide, the Operation was the largest global enforcement action ever led against waste crime. This operation widened the scope of previous INTERPOL's interventions to address all types of illegal waste, such as industrial, construction, household and medical waste.

The focus of the operation included, but was not limited to, the following unlawful activities:

- Illegal shipments of hazardous waste;
- Illegal disposal of hazardous waste and other wastes, including chemicals;
- Illegal landfill activities and dumping sites;
- Unlawful recycling operations (for example the mixing or misclassification of wastes in order to disguise hazardous content).

The action was coordinated by INTERPOL's Environmental Security Programme (ENS) with the support of the INTERPOL Pollution Crime Working Group (PCWG). It comprised of numerous sub-projects that were conducted in cooperation with international, national, and regional organizations or agencies. The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL), as the organizer of planned inspections on waste shipments in Europe, partnered with INTERPOL during the operation for the European region. Further to this, the United Nations Environment's project Regional Enforcement Network for Chemicals and Waste (UN-REN) partnered with INTERPOL on the operation for the Asian region.

2. BACKGROUND AND JUSTIFICATION

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. In an effort to reduce costs, waste criminals exploit regional inequalities such as labour laws, weak environmental legislation and law enforcement capacity to displace their criminal activities where the risk of detection is lower. These loopholes create illicit markets where hazardous waste is illegally trafficked between countries and illegally disposed of on either land or out at sea.

Hazardous waste crime has not previously been a focus of sustained law enforcement attention in most countries of the world. Nevertheless, countries increasingly recognize significant indicators of serious non-compliance and commercial criminality in the waste business.

Recent research conducted on behalf of PCWG has discussed the huge potential for criminal networks to profit from disposing of waste cheaply and illegally, including on behalf of legitimate firms that avoid taking the environmentally responsible but more expensive option

of full recycling to remove and neutralise toxic materials (INTERPOL 2009)¹. The potential gain from this business is huge. The value of the global waste sector - from collection to recycling - is estimated to be USD 410 billion a year, but this excludes a very large informal sector (UNEP and GRID-A, 2015)². With rising global population and consumption, the amount of waste being generated and discarded is increasing.

Waste is trafficked for improper re-use or disposal both domestically and transnationally, locally, regionally and internationally, which requires an international coordinated enforcement response.

The growing problem of waste trafficking and the lack of a coordinated global response were highlighted during PCWG's 2016 Meeting in Glasgow, resulting in the proposal for a global operation coordinated by INTERPOL. As a result, the PCWG Board decided to carry out an operation to encourage more frequent communication between PCWG member countries in the effort to tackle illegal disposal and trafficking of hazardous waste. The Operation, entitled 30 Days of Action, was coordinated by INTERPOL in June 2017. It led to the discovery of 1.5 million tonnes of illicit waste worldwide.

3. AIMS AND OBJECTIVES

The Operation aimed to be an “umbrella project” including regular operational activities and specially targeted operations at the preference of the participating agencies. Each participating country determined and led its own self-funded operational activities based on the existing intelligence and reported the results back to INTERPOL during the Operation.

The objectives of the operation were as follows:

- Identify criminals, companies and criminal organizations involved in the illegal disposal and illegal shipment of hazardous waste;
- Strengthen law enforcement capacity to combat waste crime at both the national and the international level;
- Enhance cross-agency cooperation to detect and deter waste crimes;
- Improve communication, cooperation, and coordination between illegal waste exporting countries and waste destination countries;
- Conduct investigative follow up on the inspections, where appropriate.

¹ INTERPOL, 2009. *Electronic Waste and Organized Crime, Assessing the links*. Phase II report for the INTERPOL POLLUTION CRIME WORKING GROUP, May 2009.

² Rucevska I., Nellemann C., Isarin N., Yang W., Liu N., Yu K., Sandnæs S., Olley K., McCann H., Devia L., Bisschop L., Soesilo D., Schoolmeester T., Henriksen, R., Nilsen, R., 2015. *Waste Crime – Waste Risks: Gaps in Meeting the Global Waste Challenge. A UNEP Rapid Response Assessment*. United Nations Environment Programme and GRID-Arendal, Nairobi and Arendal. Accessed at:

http://gridarendal-website.s3.amazonaws.com/production/documents/:s_document/27/original/RRA_WasteCrime_screen.pdf?1483646300

5.1 Pre-Operational Phase (February-May 2017)

5.1.1 National Operational Coordinators

INTERPOL extended an invitation to participate in the Operation to all member countries through their National Central Bureau (NCBs). All those willing to participate nominated two National Operational Coordinators (NOCs) to oversee the execution of the operation within their respective country. The National Operational Coordinators were the primary point of contact between INTERPOL and all other national agencies participating in the operation.

5.1.2 Pre-Operational Meeting in Singapore

INTERPOL hosted, together with UN Environment's project REN (Regional Enforcement Network for Chemicals and Waste), a pre-operational meeting in Singapore attended by Asian countries and by the World Customs Organization's Regional Intelligence Liaison Office in Asia and Pacific (WCO RILO-AP). This meeting was the occasion to discuss Asian countries' priorities and needs in terms of indicators and profiling. Attention was raised on metal, paper, and plastic scraps, in addition to electronic waste.

5.1.3 Annual PCWG Meeting

The Annual PCWG meeting was held in Rome, Italy, on 15-17 May 2017. Over 80 officials from 34 countries attended the conference, as well as representatives from the Basel Convention secretariat, UN-REN and IMPEL.



PCWG's 22nd meeting in Rome, May 15-17 2017

This meeting was a continuation of the operational planning process and was an opportunity to exchange best practices and to develop operational planning.

5.1.4 National Operational Plan (NOP)

The National Operational Plans (NOPs) provided to INTERPOL by participating countries included the list of agencies involved in the operation and the appropriate contacts within these agencies; identification of national operational priorities; and details on how the Operation will be carried out. National agencies were encouraged to schedule regular meetings or telephone calls to align their efforts.

5.1.5 Operational Reporting Template (ORT)

INTERPOL distributed an Operational Reporting Template (ORT) in May 2017. This standardized reporting tool ensured the collection of disaggregated and comparable data and information from participating countries. In particular, the template broke down into sections concerning the type of violation; the detection of the illegal activity; the description of the detected goods; details of the modus operandi, on the illicit trade route and on the alleged offenders; as well as case-management cooperation among countries involved. Countries were requested to submit a completed ORT on a weekly basis during the operational phase through their respective NCBS.

5.1.6 Teleconference Calls

INTERPOL held six pre-operational teleconference calls with the NOCs, corresponding to two calls for each of the three time zones participating in the Operation (Europe-Africa; North-Central-South-America; Asia-Pacific). These calls provided participating countries with the opportunity to discuss the execution of the operation, ask questions and adjust the ORT.

5.2 Operational Phase (June 2017)

Operational activities were carried out between 1 and 30 June 2017. As Operation 30 Days of Action was a country-led initiative, countries were responsible for identifying and carrying out their respective enforcement activities throughout the operation. As the coordinating entity, INTERPOL was responsible for managing countries participation and communication, the collection and analysis of criminal information, and the drafting of the analytical report.

5.2.1 Country Activities

The Operation was carried out simultaneously by law enforcement authorities in various countries worldwide according to independent NOPs. Some countries' activities would mobilise different relevant agencies, focusing on waste sites and/or on waste shipments, at the domestic or transnational level. Other countries rather decided to focus on gathering intelligence to take a snapshot overview that they could use to direct future investigations and additional operational activity. Some initiatives included searches and visits reviewing existing intelligence.

Much of these activities resulted in seizures, export prohibitions, fines, and returned shipments to the exporting company. Countries having intelligence-led investigations identified more violations on average. However, targeted investigations were a minority compared to operations based on random checks (66%³).

5.2.2 INTERPOL's Coordinating Role

INTERPOL managed countries' participation through regular communication with their NCBS and NOCs. INTERPOL also supported countries' operational efforts in various ways, including facilitating the exchange of information between countries via I-24/7. Furthermore,

³ Data based on a response rate of 73% (national reports providing details on detection methods).

INTERPOL's role consisted of collecting and elaborating data contained in the ORTs with a view to undertaking criminal analysis.

5.2.3 Reporting

Most participating countries reported their operational results back to INTERPOL on a weekly basis, according to the ORT. Some countries, however, faced challenges in completing and delivering the ORT in a timely and accurate manner. Challenges included language barriers and the need to translate reporting templates; limited or no access to computers and software in two countries; and the consolidated use of a different template for reporting waste crimes among European Union countries. The final dataset included reports from 35 participating countries.

5.3 Post-Operational Phase (July – November 2017)

5.3.1 Data Analysis and Report Drafting

The information and data provided by participating countries via the ORT were compiled in a single dataset with a view to analyzing prevalent trends in waste crimes and related needs in law enforcement capacity.

5.3.2 Communication Campaign

A communication campaign revolved around INTERPOL's media release published internationally and a Twitter campaign held in parallel to raise awareness on waste trafficking among the general public. The campaign resulted in good media coverage with at least 30 press articles relaying information about operational results.

5.3.3 Seeking Feedback from Participating Countries

Participating countries provided additional feedback through a post-operational questionnaire. It allowed INTERPOL to have a deeper insight into countries' views on success factors, lessons learned, and countries' key needs and recommendations. This included specific requests for training, technical assistance and capacity building.

6. RESULTS

6.1 Key Results

Operation 30 Days of Action is the largest global law enforcement operation ever conducted against waste crimes, in terms of scope, international participation and outcomes.

43 countries from every region of the world participated in this Operation, which resulted in the detection of 664 cases, of which 238 were cases of illegal waste sites and 423 were illicit waste trade cases (3 cases were unspecified). Hazardous waste was detected in 30% of all cases. As a result of the Operation, 483 individuals and 264 companies were reported for

waste crimes and violations by national authorities and over 1.5 million tons of illicit waste was detected.

Operational findings indicate that the illicit waste sector is a transnational business involving all regions of the world. Waste crimes and administrative violations were detected in 84 countries and territories worldwide⁴. 62% of illicit waste trade cases occurred along transboundary routes. Alleged offenders from different countries and regions of the world were sometimes involved in the same case. Given the complexity of shipping operations (requiring a certain degree of organization both at departure and destination) reflected in the number of offenders identified in the same waste trafficking cases (up to 88 individual in a single case), as well as the transboundary nature of most movements with criminal implications, it appears that transnational organized crime could play a role in a number of cases.

The Operation confirmed some known waste crime streams but revealed also some emerging trends.

Developed countries, particularly in Europe, appeared at the core of the illicit waste management business. The overwhelming majority of illegal waste disposal sites were detected in Europe. Participating authorities identified 134 routes of transboundary illicit waste trade, of which 60% were interregional movements. The vast majority of these interregional movements corresponded to exports from Europe towards developing countries and countries with economies in transition. Europe was also the region where most intraregional and domestic illicit trade took place. However, these findings should be analysed bearing in mind that more than 50% of countries participating in the Operation were European countries with consolidated waste crime-related legislations and law enforcement capacities.

Emerging trends included the rise of the Middle East and Latin America both as import and export regions, as well as the incidence of intraregional waste trafficking and of illegal hazardous waste disposal within Latin America.

Effective interagency cooperation at the national level and good communication between INTERPOL and participating countries were key success factors of the operation. The holistic approach to waste crime enabled countries' participation according to their specific priorities and capacities. However, follow up interventions should address narrower crime areas through targeted measures. In order to improve the effect of future efforts the planning stage and information sharing among countries needs to develop further. Emphasis should be put on the development of intelligence-led investigations on criminal networks and how to reach successful prosecutions. The awareness and knowledge of waste regulations and waste crimes needs to increase among law enforcers and the broader community.

⁴ Austria, Belgium, Benin, Bosnia Herzegovina, Botswana, Brazil, Bulgaria, Burkina Faso, Cameroon, Canada, China, Croatia, Cyprus, Czech Republic, Democratic Republic of Congo, Denmark, Dominican Republic, Egypt, El Salvador, Estonia, Finland, France, French Guyana, Gabon, Gambia, Germany, Ghana, Gibraltar (United Kingdom), Greece, Guinea, Hong Kong (China), Hungary, India, Indonesia, Ireland, Italy, Ivory Coast, Jamaica, Jordan, Kenya, Kuwait, Latvia, Lithuania, Luxembourg, Madagascar, Malaysia, Malta, Mauritania, Mexico, Morocco, Myanmar, the Netherlands, New Caledonia (France), Nigeria, Norway, Oman, Pakistan, Peru, the Philippines, Poland, Portugal, Republic of the Congo, Reunion (France), Romania, Senegal, Sierra Leone, Slovakia, Slovenia, South Korea, Spain, Sri Lanka, Sweden, Switzerland, Taiwan, Tanzania, Togo, Tunisia, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States of America, Vietnam, and Zambia.

6.2 Detection

The majority of all violations (66%) were detected through random checks⁵. This percentage was even higher with regard to waste shipments, with 72% of these cases detected through random checks. Detections resulting from investigative and intelligence-based activities occurred only in Europe and the Americas. This information suggests the need for enhanced intelligence-led investigation capacities among law enforcement agencies worldwide, especially in Asian and African countries.

National authorities detected illegal waste in a great variety of objects and locations. Illegal waste disposal sites were found mainly in industrial parks and unspecified open areas. Trucks and containers were by far the most frequent means to traffic waste.

Illegal waste was detected thanks to the concerted efforts of several government agencies, mainly police, customs and environmental authorities, but also coastguards, waste management and energy authorities, ministries of health, and local administrations.

6.3 Illicit waste detected⁶

Over 1.5 million ton of illicit waste was detected during the Operation and over 70% of this material was labelled as hazardous. However, results on waste quantity were provided only in 45% of cases. Therefore, illegal activities dismantled by the Operation likely involved a bigger amount of waste.

Construction and demolition waste and waste from the car industry accounted for the largest share of waste in illegal dumping sites. Biological and chemical waste types also accounted for a significant share of waste illegally disposed, especially in Latin America; this waste type has not been typically associated with illegal disposal so far.

Electronic waste (e-waste) was prevalent in illicit shipments, followed by metal waste and waste from the car industry. For example, e-waste was detected in 60% of all illegal waste shipments from Europe to Africa, which was the most prevalent transnational trafficking flow detected.

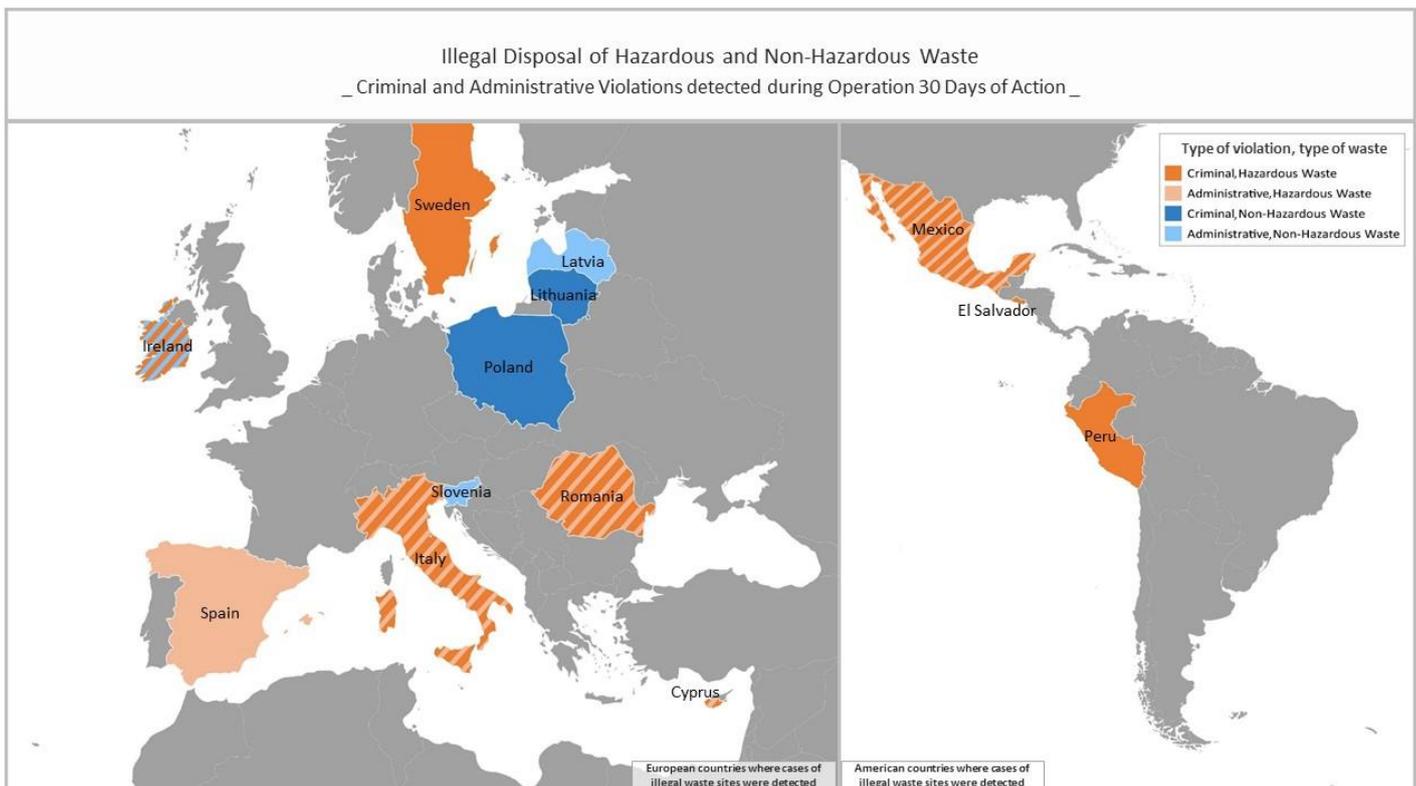
The estimated monetary value of waste detected was provided in 15% of the reported cases, amounting to 5 million USD. Given that this sample was representative of a wide variety of cases and the consistency in waste types detected, it is possible to estimate that the overall value of all waste involved in 664 operational reports at around USD 33 million.

⁵ Data based on a response rate of 73% (national reports providing details on detection methods).

⁶ Annex 2 details the eleven-category typology of wastes detected during the Operation and used for the following data description.

6.4 Illicit Waste Disposal

As highlighted in Map 2, illicit waste sites were detected most frequently across Europe (94% of all cases) and occasionally in Latin America. The two regions combined reported 238 cases in 13 countries. Administrative violations outnumbered criminal offences (146 and 95 cases respectively).



Map 2: Countries where cases of illegal disposal were detected during Operation 30 Days of Action

Illegal waste disposal is highly prevalent in Southern Europe

Ten European countries⁷ dismantled illegal waste sites during the Operation, although the most significant results were presented by Italy (101 cases), Spain (66 cases) and Cyprus (26 cases). Construction and demolition waste accounted for the largest share of commodities illegally disposed in Europe, followed by waste from the car industry (end-of-life-vehicles, vehicle oil, tyres, and car batteries). Biological and chemical waste was also significant, expired medicines, sludge, paint, pesticides and tanned leather. Moreover, some metal waste was found illegally disposed, which could be surprising as profit can be commonly generated from trading them instead of disposing them. Finally, illegally disposed e-waste was commonly mixed with other materials. Proportions of waste types found on illicit waste sites in Europe are detailed in Annex 3.

⁷ Cyprus, Ireland, Italy, Latvia, Lithuania, Poland, Romania, Slovenia, Spain, and Sweden.

Biological and chemical waste dumping sites discovered in Latin America

Three Latin American countries (El Salvador, Mexico and Peru) dismantled 14 illegal waste sites, all of them involving biological and chemical waste. An interesting case of crimes convergence was found in El Salvador, where the illegal disposal of 10 tonnes of expired medicines was combined with the illegal collection, re-packaging and subsequent trade in such expired pharmaceutical products. Proportions of waste types found on illicit waste sites in Latin America are detailed in Annex 4Annex 3.

6.5 Illicit Waste Trade Routes

423 cases of illicit waste trade were reported by national authorities participating in the Operation, highlighting the prevalence of transnational flows (62% or 262 cases) against domestic trade (36% or 153 cases). Transcontinental flows accounted for the majority of transboundary movements (152 cases). Intra-continental trafficking was less pronounced but still significant (96 cases).

Transnational waste trafficking affected 81 countries worldwide as shown in

Map 3 and

Map 4 : 36 export countries, 62 import countries and 14 transit countries (with many of them falling simultaneously under two or three categories).

The complete list of countries and their classification is contained in Annex 5. Domestic traffic emerged only in eight countries⁸.

This Operation found Europe involved in the overwhelming majority of cases of all types of trafficking, confirming the key role played by this region in the illicit waste business. Almost all transcontinental movements originated in developed countries (in Europe, North America and East Asia). Developing countries and countries with economies in transition were primary recipients of waste shipments trafficked across regions; however, intra-continental flows exist within Africa and Latin America. Key trafficking routes are detailed below.

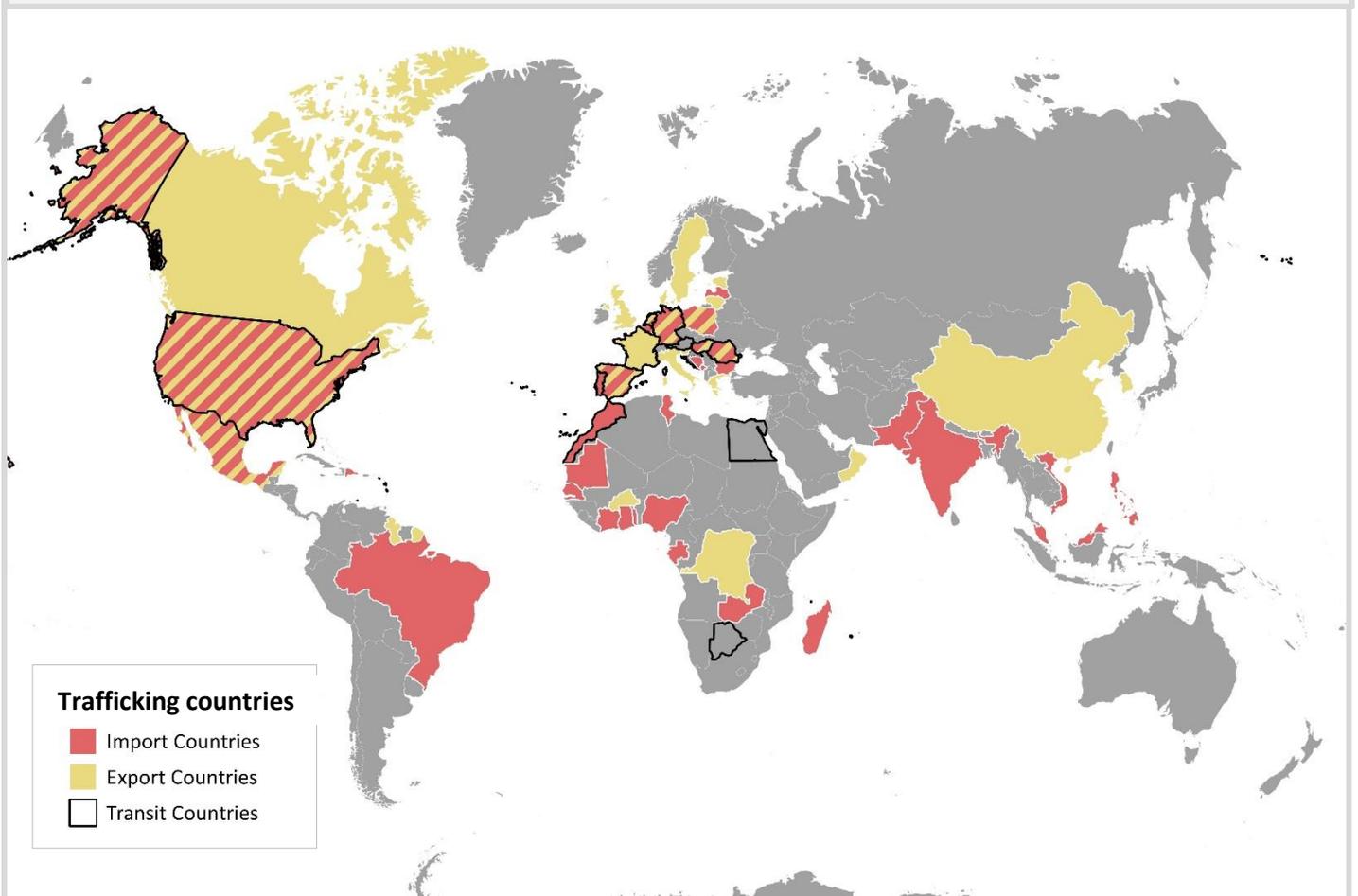
Among all cases of illicit waste trade, 160 were reported as criminal offences (

Map 3) and 258 as administrative violations (Map 4) (5 were unspecified).

⁸ Belgium, Cyprus, Italy, Mexico, Peru, Slovenia, Spain, and Sweden.

Import and Export countries in Waste Trafficking

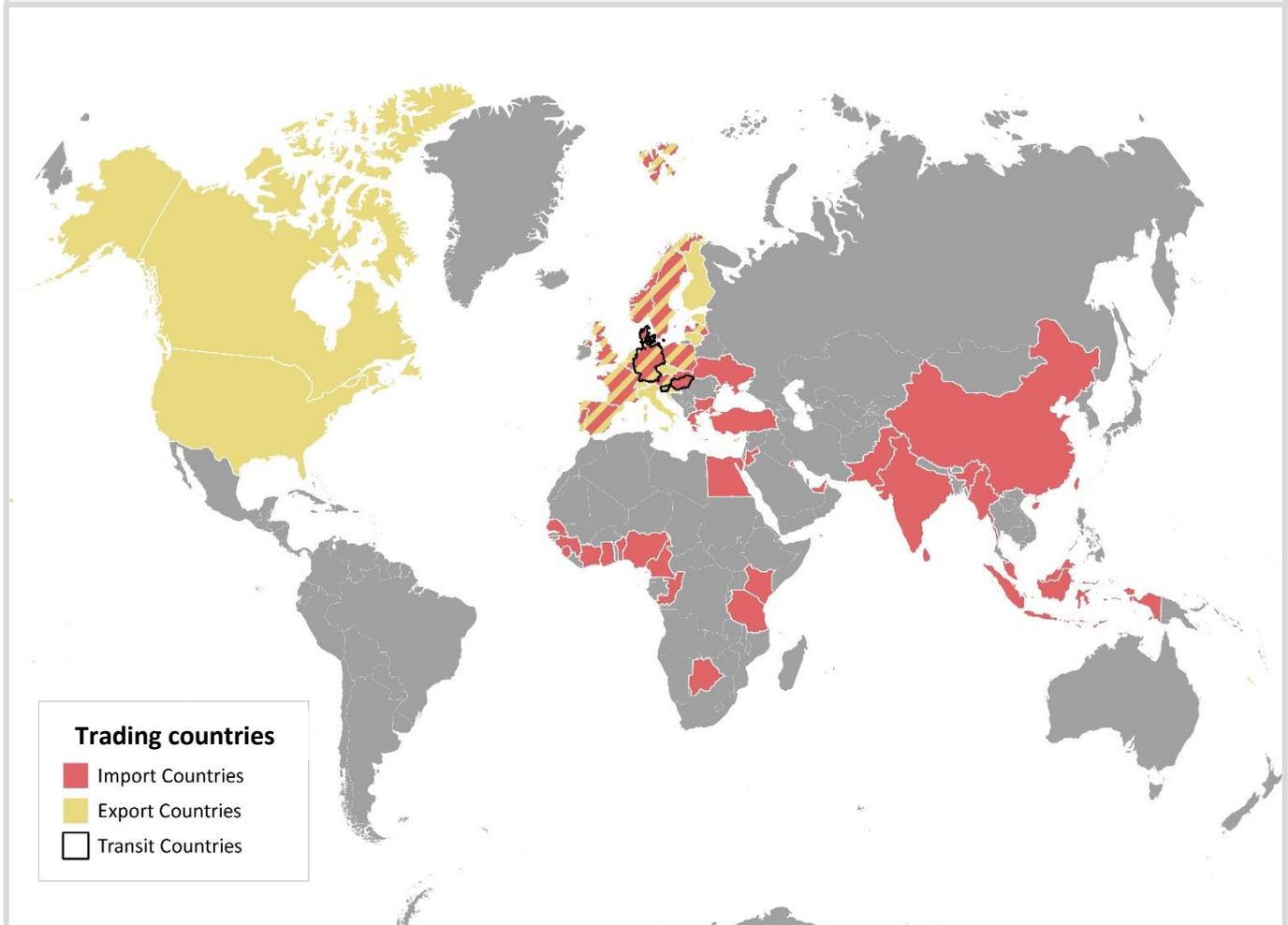
Criminal Violations detected during Operation 30 Days of Action



Map 3: Countries detected during the Operation as involved in criminal violations on waste shipments, at the export, transit and/or import level

Import and Export countries in Illicit Waste Trade

Administrative Violations detected during Operation 30 Days of Action



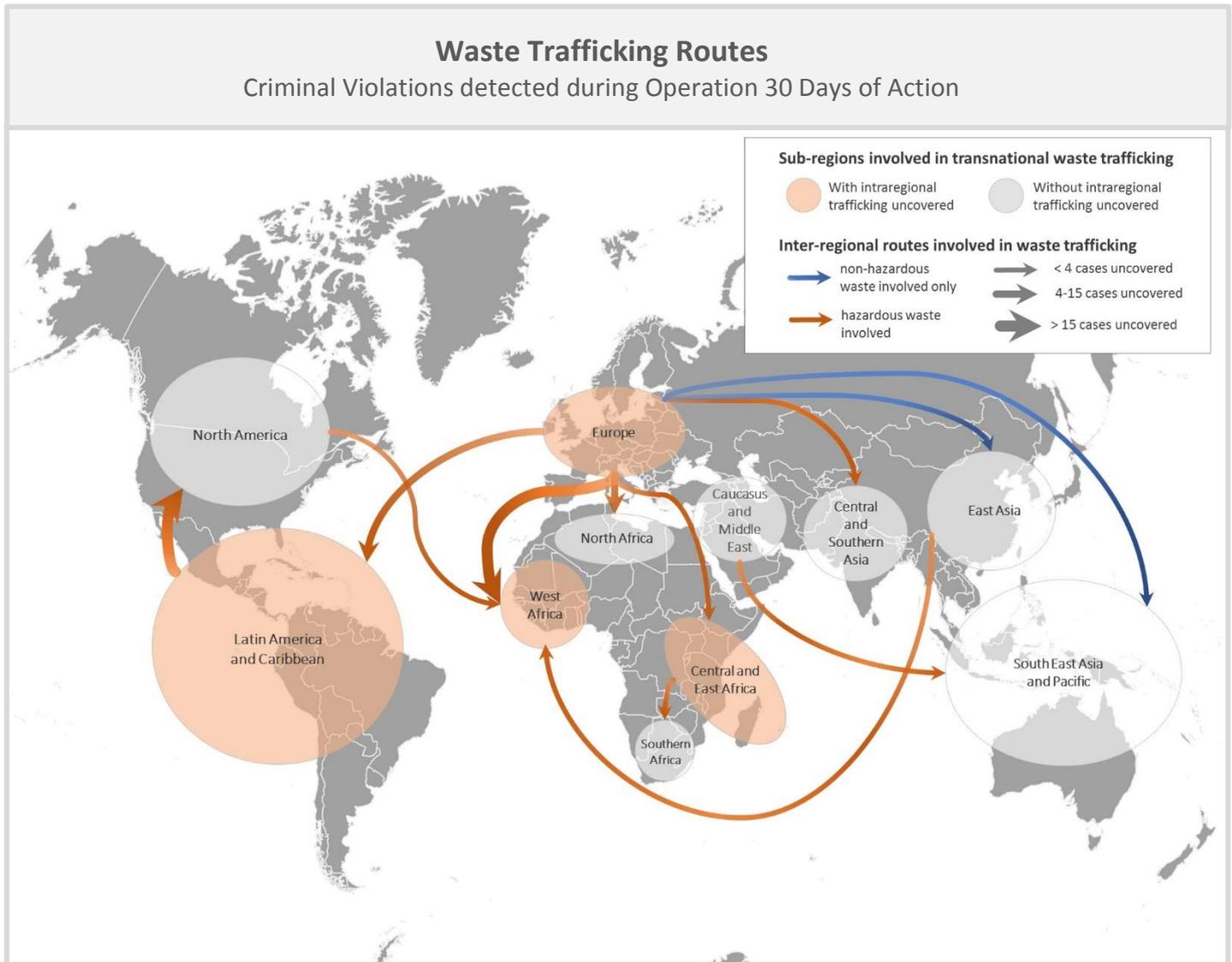
Map 4: Countries detected during the Operation as involved in administrative violations on waste shipments, at the export, transit and/or import level

6.5.1 Transcontinental Flows

Europe emerged as the main export region worldwide, while Africa and Asia were the main import regions. Exports from Europe to Africa were the main trafficking flow detected during the Operation (68% of all transcontinental trafficking cases), followed by exports from Europe to other regions of the world. North America was the second largest waste exporter, with shipments sent to Asia and Africa.

European exports to Africa are the most prevalent

The breakdown of the “Europe to Africa” flows indicates the main destination to be West Africa (74 cases), followed by North Africa (9 cases), Central-Eastern Africa (5 cases) and Southern Africa (1 case). Most cases involved hazardous waste (88%). Waste types detected were essentially e-waste falsely declared as used electrical goods (43%) and waste from the car industry (32%) which mostly included used tyres (20%) in addition to vehicle components and oil – or a mixture of both e-waste and tyres (see Annex 7).



Map 5: Transcontinental waste trafficking routes detected during Operation 30 Days of Action

European exports to Asia are significant

Two main waste streams were identified along this cross-regional flow. On the one hand, significant exports of paper waste from Cyprus to India, Pakistan, China, and Indonesia (1065 tons). On the other hand, trafficking in metal waste from Sweden to Pakistan (730 tons).

Additional illicit trades with a lower incidence included almost 100 tons of plastic waste exported from Portugal to Hong Kong, Malaysia and Myanmar; 75 tons of cable waste (e-waste) exported from Sweden to Taiwan, transiting through Denmark; and 25 tons of compressors waste exported from Cyprus to Pakistan. The United Kingdom was also identified as an export country to China, Hong-Kong, India, and Sri Lanka.

and Jordan. One particular investigation also featured the Middle East as the exporter, with mixed hazardous waste trafficked from Oman to the Philippines.

Africa and Asia are the main import regions

Operational results confirmed that Asia and Africa are the main dumping regions for the illicit waste business. In addition to waste shipments imported primarily from Europe, Africa and Asia received imports also from North America and in one case from East Asia. Waste types involved in those shipments converged with those coming from Europe. It consisted mainly of used car tyres exported from North America and East Asia to West Africa and mix of hazardous plastic scraps, metal scraps and e-waste going from North America to East and South Asia.

Europe also receives waste imports

Two European countries reported waste imports from other regions. One concerned aeroplane wreck pieces transported from New Caledonia to France in kit form destined to an aviation museum without any permit or labelling, though no trace of asbestos or other hazardous material were found. The other case concerned metal waste (copper, bimetals, and mercury) shipped from the United States of America to Belgium. However, this anecdotal evidence is too limited to classify Europe as a significant import region. Further research and investigation is required.

6.5.2 Intra-continental flows

96 intraregional cases of illicit waste trade were found in Europe (the largest number of cases). Intra-continental trade within Africa and Latin America was also identified (see regional maps with intraregional trafficking routes in Annex 6).

Illicit trade within Europe

Intra-European trade involved most countries. However, the highest number of cases occurred between Western and Northern European countries, with Germany, Belgium and the Netherlands playing a key role. A smaller amount of violations were detected from Western-Northern Europe to Central-Eastern Europe and vice versa, as well as between Central and Eastern European countries.

All types of waste were detected in intra-European illicit trade (see Annex 8). Cases involving hazardous waste involved chemical waste sometimes mixed with oil waste or vehicle waste, as well as industrial oil, car oil, car batteries and car parts, electronic waste, household waste, hospital waste, pharmaceutical and chemical contaminated objects, salt slag from secondary aluminium industry, and combustible waste. In addition, 18 cases of administrative violations revealed a potential trafficking in metal waste going to and from Belgium. It included all sorts of metals, ferrous and non-ferrous, the majority of which was aluminium and shredded steel scraps.

Illicit trade within Africa

Four cases of illegal hazardous waste shipments were detected between African countries, with limited common features. One shipment of outer/inner tubes falsely declared as used

electrical waste was detected during an illegal import into Ghana from Burkina Faso. 11 tonnes of waste including 4 tonnes of hazardous waste batteries, falsely declared as furniture, were prevented from being exported from Reunion Island to Madagascar. Two shipments of 30 and 4 tonnes of used oil were traded from the Democratic Republic of Congo to Zambia without any permit, the former shipment transiting through Botswana.

Illicit trade within Latin America

One case concerned hazardous batteries waste prevented from being illegally exported from French Guyana into Brazil. This single case deserves attention as, prior to this Operation, no information on waste crime Latin America was available. Further investigations should be considered to uncover potential illicit markets.

6.5.3 Domestic Flows

Domestic waste trafficking (153 cases reported) was found almost exclusively in a few European countries, with outstanding results in Belgium (86 cases) and Slovenia (43 cases). Administrative violations were particularly common in relation to shipments containing every type of waste that were detected domestically.

6.6 Modus Operandi in Waste Crime and Violations

Details on the modus operandi were provided in 66% of all cases reported, representative of almost all violations on waste sites (95%) and half of the violations on waste shipments. Such details describe major offending trends in waste crimes and common concealment methods, along with the convergence with other forms of crime.

6.6.1 Features and Trends in Illicit Waste Disposal

Violations identified in waste sites consisted of the lack of authorization to undertake a waste activity or to set up a waste site.

Unauthorized waste activities

The following unauthorized waste activities were identified in 50% of the total number of cases (73% of these resulted in criminal violations):

1. Storage of waste without authorisation;
2. Dumping and disposal of waste without authorisation;
3. Burial of waste without authorisation;
4. Waste management without authorisation;
5. Mismanagement of waste⁹;
6. Commercial activity with waste without authorisation.

Unauthorized storage, and dumping and disposal of waste were the most common activities, with both criminal and administrative implications. Cases involving illegal burial and

⁹ Mismanagement of waste consists of unlawful waste treatments including illegal combustion of certain waste, illegal mixing of certain waste, etc.

mismanagement of waste were a minority; however they showed consistent trends. Illegal burial concerned significant quantity of waste (from 1,500 to 1,000,000 tonnes) and were only detected in Europe. Mismanagement mostly concerned hazardous waste, such as disassembled metals and vehicles, combusted oil, household waste, e-waste and illegally mixed waste.

7% of illegal cases were identified on legal waste sites where mismanagement was detected, sometimes in combination with illegal burial and illegal disposal.

Unauthorized waste sites

Unauthorized waste site were reported for 61% of cases, with an equal proportion of criminal and administrative violations. Eight types of unauthorized sites were identified:

1. Unauthorized waste treatment facility;
2. Unauthorized landfill;
3. Abandoned site or opened area;
4. Road side;
5. Agricultural land;
6. Private property;
7. Company or commercial site;
8. Discharge in water.

Most sites were found within the premises of the company or the commercial area under investigation, or in abandoned sites and open areas. It was particularly the case for administrative violations. Some criminal cases occurred also in private properties such as private houses, stores and lands.

Details and percentages for all cases of illicit waste sites with identified modus operandi are given in Annex 9.

6.6.2 Features and Trends in Illicit Waste Trade

Investigations on waste shipments identified three key trends.

Modes of transportation

As shown in Table 1, most criminal and transnational violations were detected on maritime routes, while most domestic and administrative violations were detected on roads.

	Transportation mode	
	At sea (maritime)	On road (land)
Transnational shipments	57%	49%
Domestic shipments	32%	68%
Illegal shipments (criminal cases)	63%	43%
Unauthorised shipments (administrative cases)	36%	65%
All shipments	46%	56%

Table 1: Transportation mode used in violations on waste shipments detected during Operation 30 Days of Action¹⁰

Irregular documentation

A common trend observed across all types of shipments concerned declaration and paper work irregularities, including:

1. Missing document or permit (30% of cases);
2. Incomplete paper work and administrative errors;
3. False declaration of waste types (including misclassification and partial declaration);
4. False declaration of waste as non-waste or not declared at all;
5. Fraudulent or falsified document.

Incomplete paper work and administrative errors were particularly a feature of administrative violations on transcontinental waste movements from Europe (71% of these movements). This was reflected in the high rates of noncompliance with waste shipments regulations reported by some participating countries¹¹. This might indicate deliberate non-compliance, negligence or a lack of awareness regarding regulatory requirements by waste operators. In all cases, this indicates lax paperwork checks by operators. It also calls for a greater visibility of different regulatory requirements imposed on waste shipments by international Conventions and domestic laws of both export and import countries.

70% of the criminal violations detected on transnational shipments involved false declaration of waste as non-waste (declared as goods). It particularly concerned 92% of the detected shipments of waste exported from Europe to Africa, particularly those containing e-waste, vehicle waste and tyres (sometimes mixed and concealed) going to West Africa.

Import and export bans

The remaining waste shipments were seized on the basis of a ban on the export or import of certain hazardous wastes, such as e-waste, chemicals, oil and medical wastes. These were mostly considered as criminal violations.

Only a few cases of domestic shipments detailed the modus operandi, but most of them qualify as unauthorized or illegal transport of waste.

Details and percentages for all cases of illicit waste shipments with identified modus operandi are given in Annex 10.

6.6.3 Concealment Methods

Methods of concealment in waste shipments were described in a few cases, pointing to two key analytical considerations.

¹⁰ Note that both maritime and land transportation modes were used in some waste shipment cases. It explains that the sum of the percentages of the two transportation modes sometimes exceeds 100%.

¹¹ Slovenia reported minor infractions found in 31% of waste shipments inspected (137); The region of Quebec indicated a noncompliance rate of 30% among all inspected export movements; United Kingdom reported that 84% of the 113 inspected containers did not meet all declaration requirements.

In approximately half the cases, the authorities reported that no concealment method was used. In other words, it seems that many waste traders felt confident in trading waste illegally without needing to hide it. This leads to some assumptions, such as the traders may be familiar with the ports of embarkation and disembarkation, and did not expect to face strict inspections. Or, traders were confident in the lack of waste identification capacity among law enforcers. Moreover, such confidence may also arise from corruption of public officials. Although these options shall be treated as assumptions, all of them, if proven correct, would indicate a certain degree of repetition or routine in the exploitation of certain trading routes, and therefore organization behind illicit waste trade.

In many of the other cases, traders mostly chose unsophisticated concealment methods, such as rudimentary mixing or covering. For example, illegally transported hazardous waste was sometimes hidden behind car tyres (this was a relatively common trend among European exports to Africa). Textiles, soil and vegetation served as coverage in other case. Concealment on shipments was consistently correlated with transportation of hazardous material requiring specific and costly treatment, as well as with the false declaration of such waste.

6.6.4 Convergence with Other Crimes

A few cases indicated that waste crime was often committed together with document fraud and making false declarations to government officials for financial gain. The use of fake documents to conceal the illegal trade in waste is an additional crime (fraud). Other crimes were also committed at the same time as the waste crime, including drugs trafficking, fraud, assault, theft and other illegal types of site exploitation such as illegal construction and violation of national park territory. In one particularly interesting case, waste crime overlapped with the illegal trade in substandard and falsified medicine, with ten tonnes of dumped expired medicines being re-packed and sold abroad as new pharmaceutical products.

6.7 Alleged Offenders

483 individuals and 264 companies were reported in the course of the Operation due to their involvement in illicit waste activities, mainly administrative violations. Still, criminal offences were attributed to a large share of the individuals (44%) and companies (30%) reported.

Details on the alleged offenders and offending companies were provided by 19 participating countries in relation to only 41% of all cases detected. Such information, although fragmented and partially representative, allowed INTERPOL to profile two key indicators.

First, indicators of organized crime. National authorities usually reported only one or two people associated to each case. However, in 42 cases at least three alleged offenders (up to 140) were identified, which qualifies as an “organized criminal group” based on internationally agreed definitions¹². Ten of these cases involved criminal offences. Investigations were still ongoing at the time of reporting, thus it is difficult to estimate the extent to which these individuals acted in concert in a structured manner, and for how long. Still, the information available allow to consider that elements of organized crime emerged in at least ten cases uncovered by the Operation.

¹² United Nations Convention against Transnational Organized Crime, article 2 (a).

One country that focused its operational efforts on intelligence gathering, reported that preliminary intelligence indicates that small networks, comprised of linked individuals and small businesses with oversea contacts, are likely to present the primary criminal threat of illicit export. Such networks would function opportunistically and flexibly in response to gaps in regulatory systems.

Second, some indicators of transnational networks emerged in the framework of a broader correlation between offenders' nationality and offending location. In the overwhelming majority of cases (80%) the nationality of the alleged offenders and/or offending companies was the same as the country where the violation took place (for illegal waste sites) or where the illicit shipment originated (all trading routes combined); therefore European citizens were overrepresented in this sample. In fewer instances, individual offenders and offending companies belonged to the country of import or to third countries not involved in the case. Interestingly, a small share of cases (17) featured the combination of offenders (individuals and companies) of different nationalities, usually corresponding to the countries of export and import of the illegal waste shipments considered in the case, but sometimes also citizens of third countries. This indicates elements of transnationality in the planning and/or execution of the offence that may reflect the existence of transnational networks.

6.8 Communication and Law Enforcement Cooperation

Communication between INTERPOL and national agencies of participating countries took place through NCBs and NOCs. Regular contacts via email and/or phone calls were maintained throughout the Operation and after its completion for the purpose of following up with the results. Communication was generally timely and effective. Building personal relationships in the planning phase of the Operation greatly facilitated smooth communication.

Participating countries investigating transnational waste crimes showed strong willingness to communicate, cooperate and engage with each other. Foreign authorities from the import, export and transit countries were contacted in 62 investigations on illegal waste shipments (during the 30-day Operation only). They were responsive in the overwhelming majority of cases, with only three requests not receiving a reply. One country specifically reported that its key operational result was the establishment of new contacts with several countries worldwide, which resulted in effective information sharing. Still, it is important to further facilitate communication among law enforcement agencies internationally, especially between import and export countries, in order to disrupt criminal supply chains at different stages.

The Operation featured effective law enforcement cooperation both internationally and domestically. Two neighbouring countries undertook a joint operation along a highly sensitive segment of the common border in the framework of "30 Days of Action", resulting in the detection of 15 waste trafficking cases. A major transcontinental waste shipment was tackled along a previously unrevealed route thanks to the active law enforcement cooperation between the import and the export countries. Most participating countries ranked their domestic interagency cooperation at a high level of effectiveness, commenting that the complementary expertise of police, custom and environmental agencies was a key factor to achieve successful results.

7. EVALUATION AND WAYS FORWARD

7.1 Success Factors

- *Country-led enforcement activities.* Participating countries identified their own priorities as reflected in the implementation of their respective enforcement activities. As such, the Operation was context-specific and tailored to meet local challenges.
- *Strong engagement.* Countries showcased strong, independent initiative, and high levels of engagement to implement operational activities within their borders, despite the short timeframe for preparation.
- *Effective communication.* Teleconferences calls facilitated by INTERPOL prior to the Operation enabled participating countries to share operational plans and ask questions. The nomination of two National Operational Coordinators (NOCs) in each country allowed for streamlined communication between INTERPOL and participating countries, as well as between national authorities.
- *Holistic approach to waste crimes.* The Operation targeted the full logistical chain of the selected crime area, ranging from dumping sites to unauthorized recycling activities, shipments, transportation, concealment and illegal trade. This enabled authorities to fit their normal activities into the focus of the Operation. Different authorities are normally responsible for different parts of the logistical chain. However, the Operation's wider focus on "waste crime" enabled the inclusion of many relevant authorities and their cooperation, as reflected in the impressive number of countries and authorities participating in this initiative.
- *Interagency cooperation at the national level.* Multi-agency collaboration and joint planning occurred prior and during the Operation, providing for higher operational efficiency. At the same time, the Operation provided an opportunity to strengthen cross-agency coordination in this crime area.
- *Information sharing.* The Operation provided a platform to share criminal intelligence on waste crimes among participating countries, resulting in new and enhanced contacts and information exchange. Countries demonstrated a strong willingness to collaborate on transnational investigations identified throughout the Operation.

7.2 Lessons Learned and Recommendations

Operational coordination and cooperation

- *Narrowing down on priorities.* The broad scope of the Operation, addressing all types of waste crimes, provided for an inclusive platform to build interagency and international cooperation, and identify major trends and related needs in waste crimes globally. Consequently, participating agencies handled an impressive amount of data and information, which sometimes had an impact on the accuracy of reporting and

data analysis. It is therefore recommended that follow up interventions narrow down on specific crime areas in order to draw efforts towards priority actions through targeted measures.

- *Developing regional approaches.* Results of the Operation outlined some region-specific trends. Future Operations and interventions may consider adopting a regional approach in the framework of global coordination, by breaking the global strategy down into regional sub-strategies to achieve greater context-specificity and regional cooperation.
- *Extending the pre-operational phase.* Participating countries underlined the importance of the pre-operational phase to gather relevant stakeholders at the national level and to trigger international discussions to prepare cooperation on transitional criminal cases. On future occasions, the pre-operational phase should be extended in order to enable adequate planning at the national level and coordination among national authorities. An extended pre-operational phase should also include more international/regional preparatory meetings and teleconferences to enable greater discussion on priority actions, capacity building, international coordination, information and sharing of best practices, and targeted approaches.
- *Increasing cross-border intelligence sharing.* Countries reported many violations with links to other countries. However, case-related communication among the countries involved was not frequent enough compared with the number of transnational cases reported, leading to intelligence gaps. Means to exchange information were not clear for some participating countries. Therefore, it is recommended to raise awareness among relevant agencies on how to exchange criminal intelligence internationally and to increase the use of existing platforms provided by INTERPOL. INTERPOL can act as a facilitator in this regard.
- *Streamlining communication lines.* The majority of countries shared their reports via their NCB, but on certain occasions, delays were experienced in transmitting this information. Joint efforts are required to strengthen the communication lines between relevant national agencies, NCBs and INTERPOL. Streamlining the reporting template may also contribute to greater timeliness.

Law enforcement capacity

- *Delivering investigative training.* Complex waste crime streams make it difficult for law enforcers to identify the applicable waste regulations, especially when waste is mixed. Participating investigators reported this challenge and their need for more expertise, asking for specialized investigative training. To meet this need, INTERPOL may facilitate the dissemination of evidence-based reports. Opportunities shall be identified to strengthen cooperation between prosecution and police authorities.
- *Tightening links between police and environmental authorities.* Law enforcers are challenged by increasingly complex waste crimes and they often lack specialized understanding of waste and environmental issues. Some countries made progress by establishing police departments specializing in environmental crimes. Police

authorities from around the world are recommended to build closer relationship with subject matter experts.

- *Disseminating knowledge of waste regulations.* Waste regulations vary across countries, especially those concerning bans on import and export of certain types of waste. Law enforcement officers investigating waste shipments often lacked adequate information on the types of waste that are regulated and controlled in other countries. An information sharing platform on waste regulations across the globe could support international collaboration to detect illegal waste shipments and a better enforcement of waste regulations. A better dissemination of waste regulations among waste operators could also reduce the amount of minor infractions due to non-deliberate non-compliance.
- *Targeting criminal networks.* Participating countries gathered and shared limited information concerning the involvement of organized crime in waste crimes, as well as on the potential convergence of waste crimes with other types of (organized) criminal activities. Greater focus should be placed on this aspect in order to better understand waste crime streams, detect offenders, disrupt criminal enterprises and prosecute them for more severe criminal laws.
- *Identifying and addressing intelligence gaps.* Awareness of waste crimes and generation of related criminal intelligence is still at an initial development stage in many countries. Such intelligence gaps need to be addressed through enhanced intelligence gathering, analysis and sharing in order to tackle these crimes in a more systematic and effective manner.
- *Developing intelligence-led policing capacities.* The predominance of random checks over intelligence-led detections confirmed the need to develop intelligence-led policing capacities. To acquire such expertise, law enforcers should benefit from training on criminal intelligence analysis and how to apply this knowledge in planning for their operations.
- *Supporting countries with limited resources and expertise.* Shortage of financial resources and expertise hindered some countries to prepare and implement operational activities. Some countries withdrew from the Operation because of this lack of capabilities. INTERPOL should look for ways to foster participation of those countries in need of support, especially coastal developing countries in Africa, South and South-East Asia and Latin America, which are at the forefront of illegal waste imports. Capacity building and technical assistance initiatives should be considered.

ANNEX DOCUMENTS

Annex 1: List of participating countries in Operation 30 Days of Action

1. ALBANIA
2. ARGENTINA
3. AUSTRALIA
4. AUSTRIA
5. BELGIUM
6. BRAZIL
7. CANADA
8. CENTRAL AFRICAN REPUBLIC
9. CHINA
10. CYPRUS
11. ECUADOR
12. EL SALVADOR
13. ESTONIA
14. FINLAND
15. FRANCE
16. GERMANY
17. GHANA
18. HUNGARY
19. INDIA
20. IRELAND
21. ITALY
22. LATVIA
23. LEBANON
24. LITHUANIA
25. LUXEMBOURG
26. FYR MACEDONIA
27. MEXICO
28. NETHERLANDS
29. NIGERIA
30. PERU
31. PHILIPPINES
32. POLAND
33. PORTUGAL
34. ROMANIA
35. SLOVENIA
36. SOUTH AFRICA
37. SPAIN
38. SWEDEN
39. THAILAND
40. TOGO
41. UNITED KINGDOM
42. UNITED STATES OF AMERICA
43. ZAMBIA

Annex 2: Categories used in this report for data description on waste types

Colour code used in the data description	Types of waste	Description	Examples of waste reported during the Operation
	Biological and Chemical waste	Waste containing mostly natural organic materials (remains of plants, animal excrement, biological sludge from waste-water treatment plants and so forth) ¹³ and industrial chemicals.	Tanned leather, medical waste, sludges, waste water, paint, pesticides, etc.
	Construction and demolition waste	Waste generated from the construction industry	demolition waste and excavated earth and rock, asbestos, stone-cutting waste, buildings residues, wood waste, soil mass
	E-waste	Electronic waste that are not vehicle related (otherwise, classified as “waste related to the car industry”)	Computers, waste crtvs, fans, printers, monitors, batteries, speakers, wires, etc
	Glass waste	material or waste composed of glass	glass packaging
	Household waste	Waste generated from domestic and municipal sources	Cooking oil, used clothes, Hazardous household waste, vegetable waste, organic waste, refuse derived fuel, etc.
	Metal waste	material or waste composed of metal	ferrous waste, non-ferrous waste, iron, copper, wires, metal scraps
	Oil waste	All oil waste that is not clearly identified as related to the car industry (otherwise, categorised under “waste from the car industry”) or household uses (otherwise, it is categorised under “household waste”)	Used oil, combustible waste, etc.
	Paper waste	material or waste composed of paper	Paper, cardboard, etc.
	Plastic waste	material or waste composed of plastic	Plastic bottles, plastic packaging, plastic bags, etc.
	Waste from the car industry	Waste generated by used vehicles. It includes end of life vehicles (ELV), car parts, and vehicle oil	Car dismantling, ELV, motors, lead acid batteries, motor filters, accumulators, end of life tyres, tyres, wheel waste, tyres oil, motor oil, vehicle used oil, diesel, etc.
	Mixed materials	Shipments, load or site containing different types of waste listed above	“Several wastes”, “end of life vehicles, clothes, batteries, furniture, tractor, fridge, refrigerators”, “Mixed Dry Recyclables”, “Mixtures of waste”, “bulky refuse, electro waste”, etc.

¹³ OECD, Glossary of Environment Statistics, Studies in Methods, Series F, No. 67, United Nations, New York, 1997 (updated in 2001). Accessed at: <https://stats.oecd.org/glossary/detail.asp?ID=3097>

Annex 3: Types of waste found in illicit waste sites in Europe¹⁴

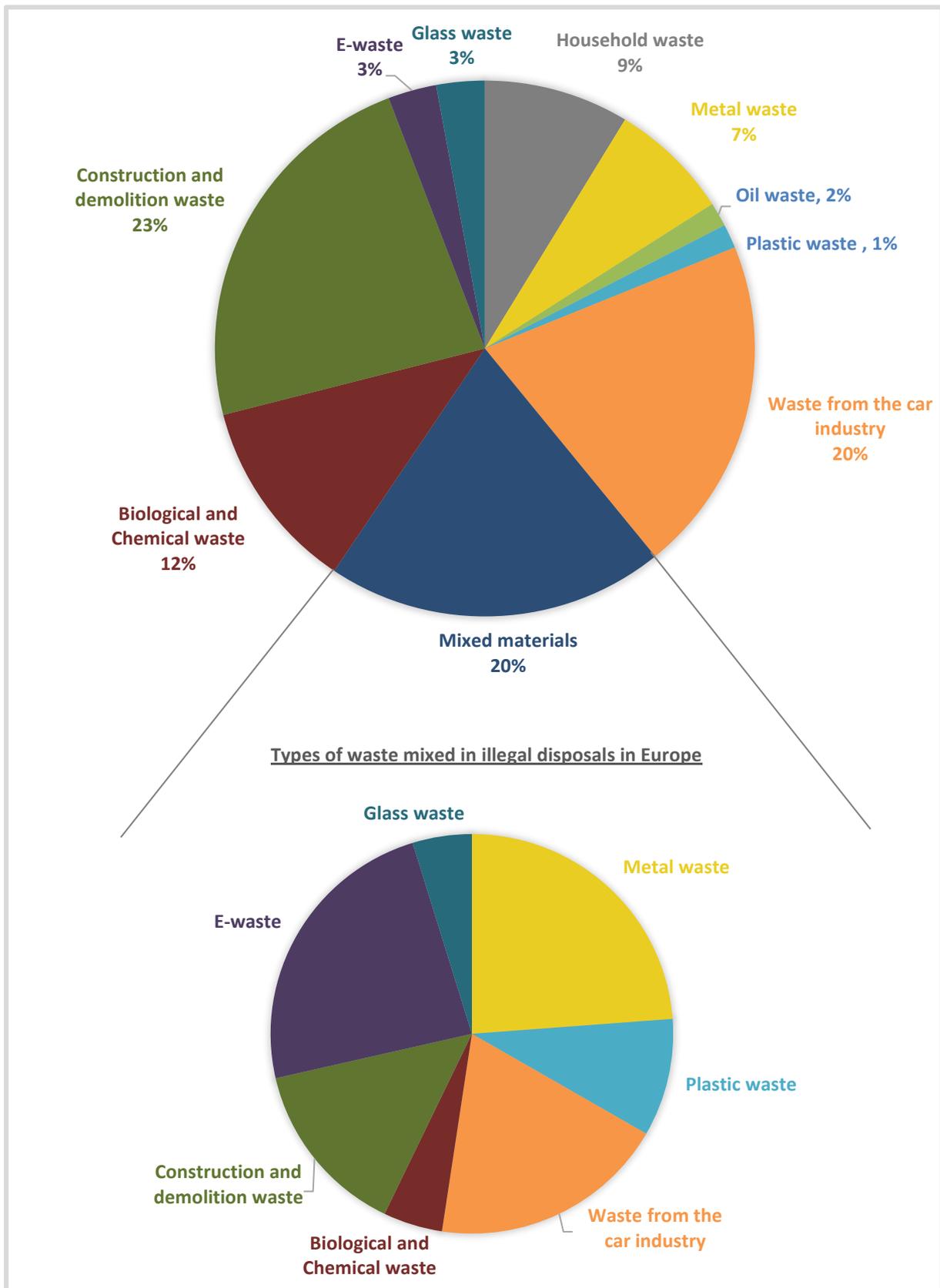


Figure 1: Types of waste found in waste sites violating criminal laws detected in eight (8) European participating countries in Operation 30 Days of Action

¹⁴ Data based on a response rate of 80% (national reports from European countries providing description of waste found in waste sites): 69 cases of criminal violations and 108 cases of administrative violations

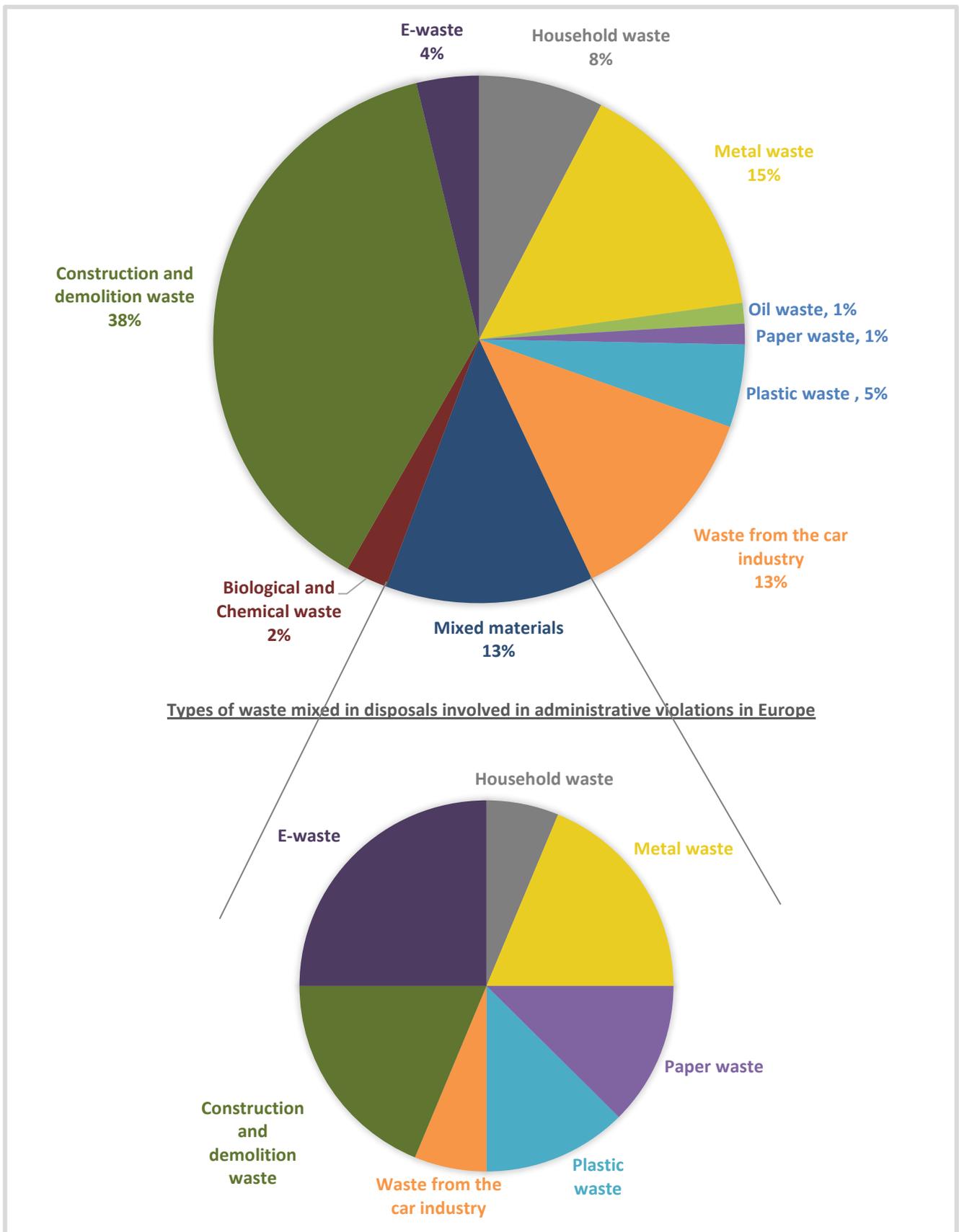


Figure 2: Types of waste found in waste sites detected in violation of administrative regulations, in seven (7) European participating countries in Operation 30 Days of Action

Annex 4: Types of waste found in illicit waste sites in Latin America¹⁵

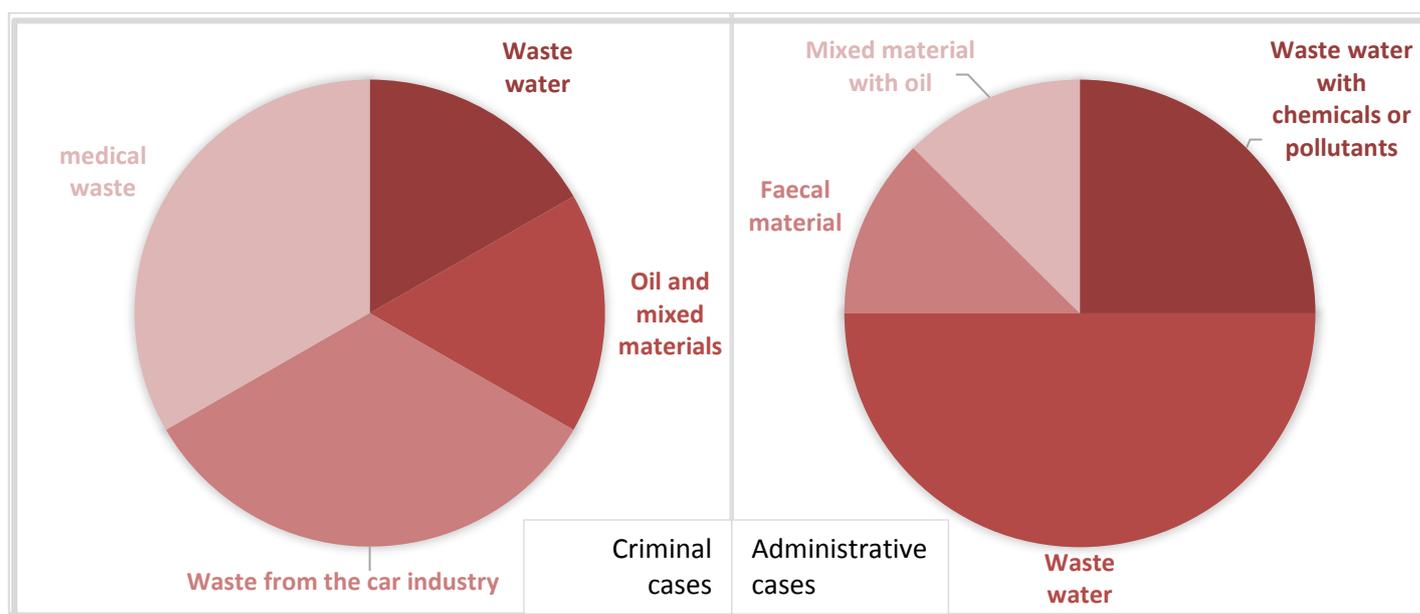


Figure 3: Types of waste found in illicit waste sites in three Latin American countries

Annex 5: List of countries and territories detected as involved in cases of transnational illicit waste trade during Operation 30 Days of Action, at the export, transit and/or import level

Table 2: List of countries and territories detected as involved in waste trafficking during the Operation (criminal violations only)

COUNTRIES AND TERRITORIES INVOLVED IN WASTE TRAFFICKING	EXPORT COUNTRIES	IMPORT COUNTRIES	TRANSIT COUNTRIES
AUSTRIA			X
BELGIUM	X	X	
BOSNIA AND HERZEGOVINA		X	
BOTSWANA			X
BRASIL		X	
BULGARIA		X	
BURKINA FASO	X		
CANADA	X		
CHINA	X		
CROATIA			X
CYPRUS	X		
DEMOCRATIC REPUBLIC OF CONGO	X		
DENMARK	X		
DOMINICAN REPUBLIC		X	
EGYPT			X
ESTONIA	X		
FRANCE	X	X	X
FRENCH GUYANA	X		
GABON		X	

¹⁵ Data based on a response rate of 100%.

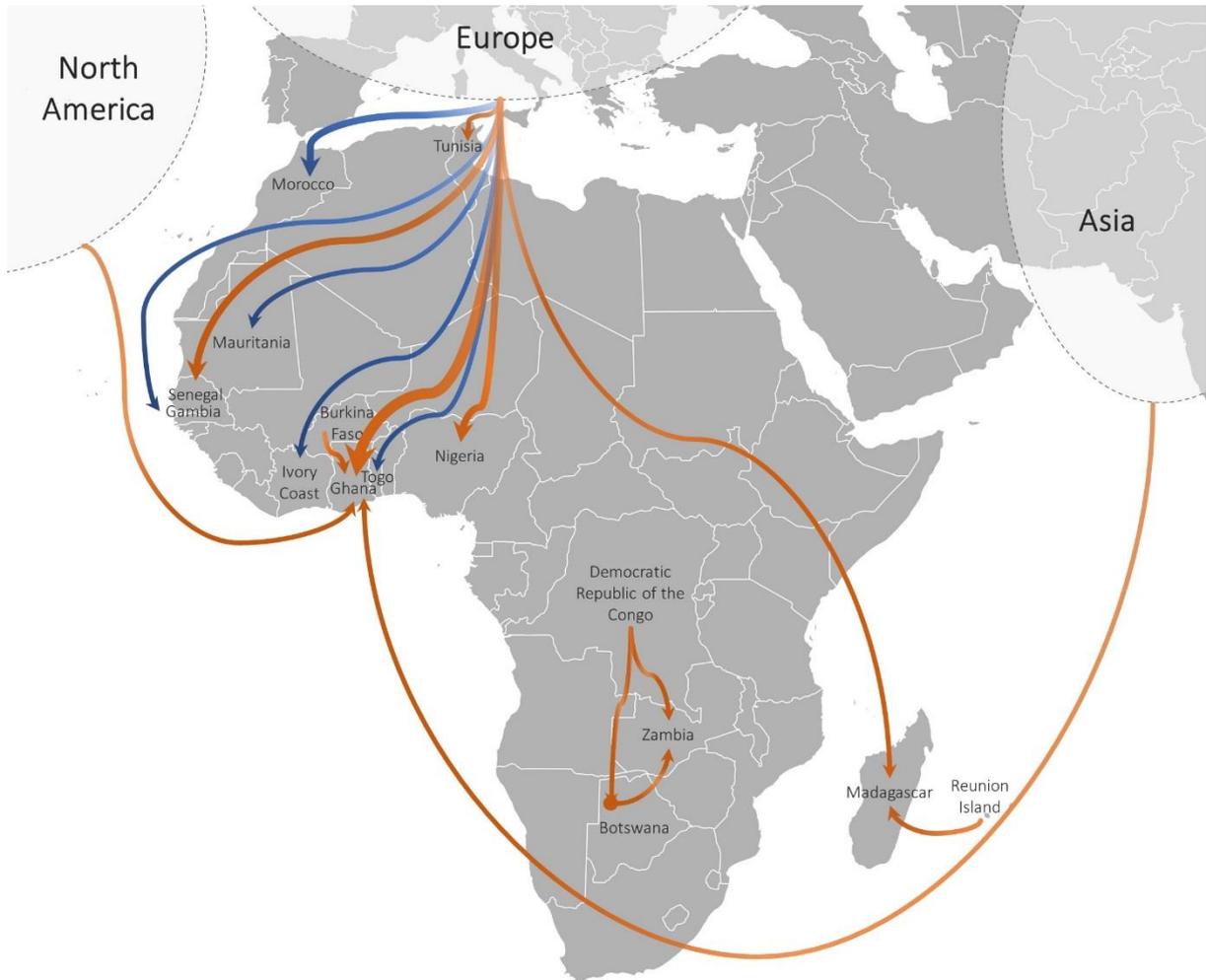
GAMBIA		X	
GERMANY	X	X	X
GHANA		X	
GIBRALTAR (UNITED KINGDOM)	X		
GREECE	X		
HONG KONG (CHINA)		X	
HUNGARY	X	X	X
INDIA		X	
ITALY	X		
IVORY COAST		X	
JAMAICA		X	
LATVIA		X	
LITHUANIA	X		
MADAGASCAR		X	
MALAYSIA		X	
MALTA			X
MAURITANIA		X	
MEXICO	X	X	
MONTENEGRO		X	
MOROCCO		X	X
NETHERLANDS	X	X	X
NIGERIA		X	
OMAN	X		
PAKISTAN		X	
PHILIPPINES		X	
POLAND	X	X	
PORTUGAL		X	X
REUNION (FRANCE)	X		
ROMANIA	X	X	X
SENEGAL		X	
SLOVENIA	X		
SOUTH KOREA	X		
SPAIN	X	X	X
SWEDEN	X		
SWITZERLAND	X		
TOGO		X	
TUNISIA		X	
UNITED KINGDOM	X		
UNITED STATES OF AMERICA	X	X	X
VIETNAM		X	
ZAMBIA		X	

Table 3: List of countries and territories detected as involved in illicit waste trade during the Operation (administrative violations only)

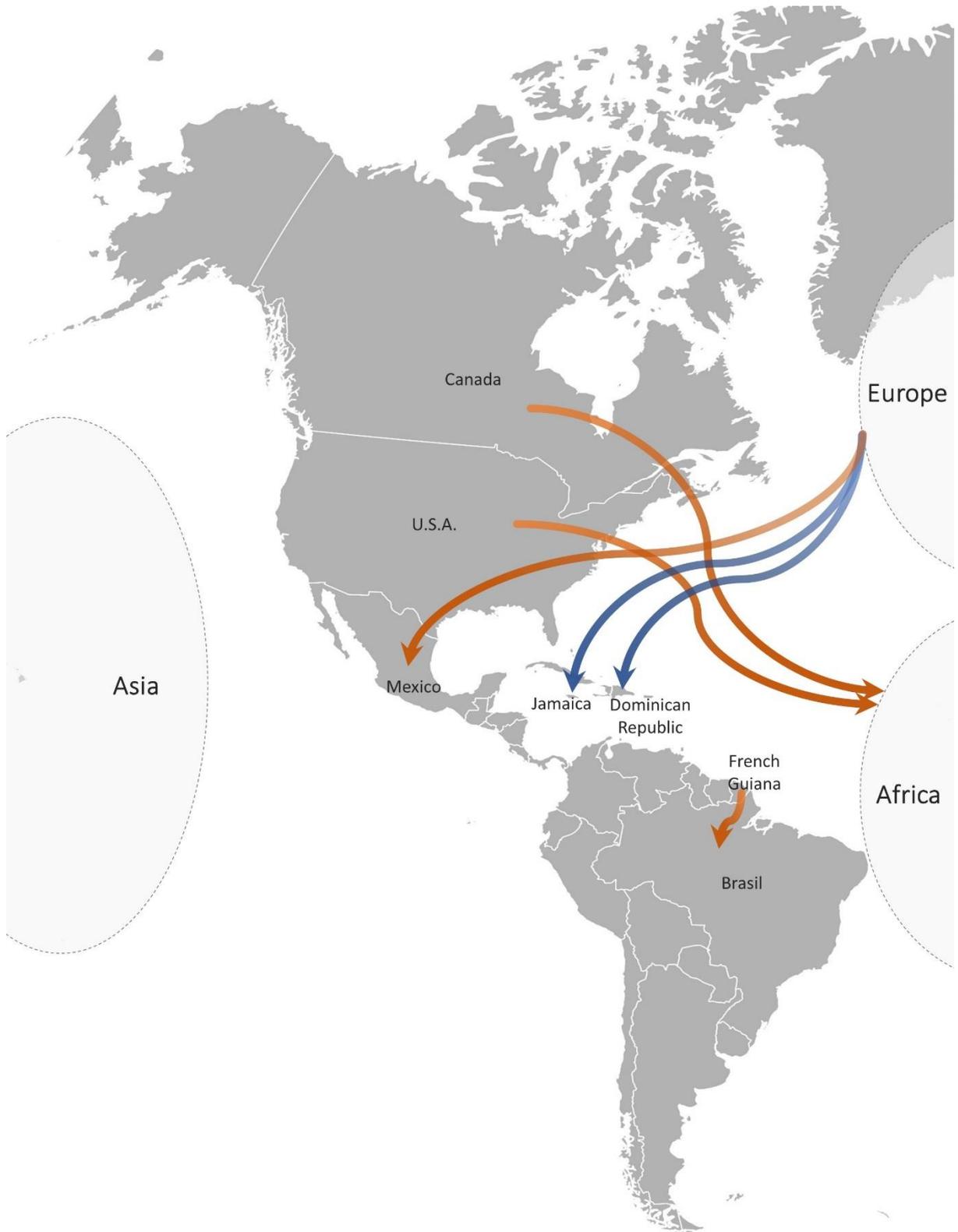
COUNTRIES AND TERRITORIES INVOLVED IN ILLICIT WASTE TRADE	EXPORT COUNTRIES	IMPORT COUNTRIES	TRANSIT COUNTRIES
AUSTRIA	X	X	
BELGIUM	X	X	
BENIN		X	
BOTSWANA		X	
BULGARIA		X	
CAMEROON		X	
CANADA	X		

CHINA		X	
CROATIA	X		
CYPRUS	X	X	
CZECH REPUBLIC	X		
DENMARK	X	X	X
EGYPT		X	
ESTONIA	X		
FINLAND	X		
FRANCE	X	X	
GAMBIA		X	
GERMANY	X	X	X
GHANA		X	
GREECE		X	
GUINEA		X	
HONG KONG (CHINA)		X	
HUNGARY		X	X
INDIA		X	
INDONESIA		X	
ITALY	X		
IVOIRY COAST		X	
JORDAN		X	
KENYA		X	
KUWAIT		X	
LATVIA	X	X	
LITHUANIA	X		
LUXEMBURG		X	
MALAYSIA		X	
MYANMAR		X	
NETHERLANDS	X	X	
NEW CALEDONIA	X		
NIGERIA		X	
NORWAY	X	X	
PAKISTAN		X	
POLAND	X	X	
PORTUGAL	X	X	
REPUBLIC OF THE CONGO		X	
SENEGAL		X	
SIERRA LEONE		X	
SLOVAKIA		X	
SLOVENIA	X		X
SPAIN	X	X	
SRI LANKA		X	
SWEDEN	X	X	
SWITZERLAND	X		
TAIWAN		X	
TANZANIA		X	
TURKEY		X	
UKRAINE		X	
UNITED ARAB EMIRTAES		X	
UNITED KINGDOM	X	X	
UNITED STATES OF AMERICA	X		

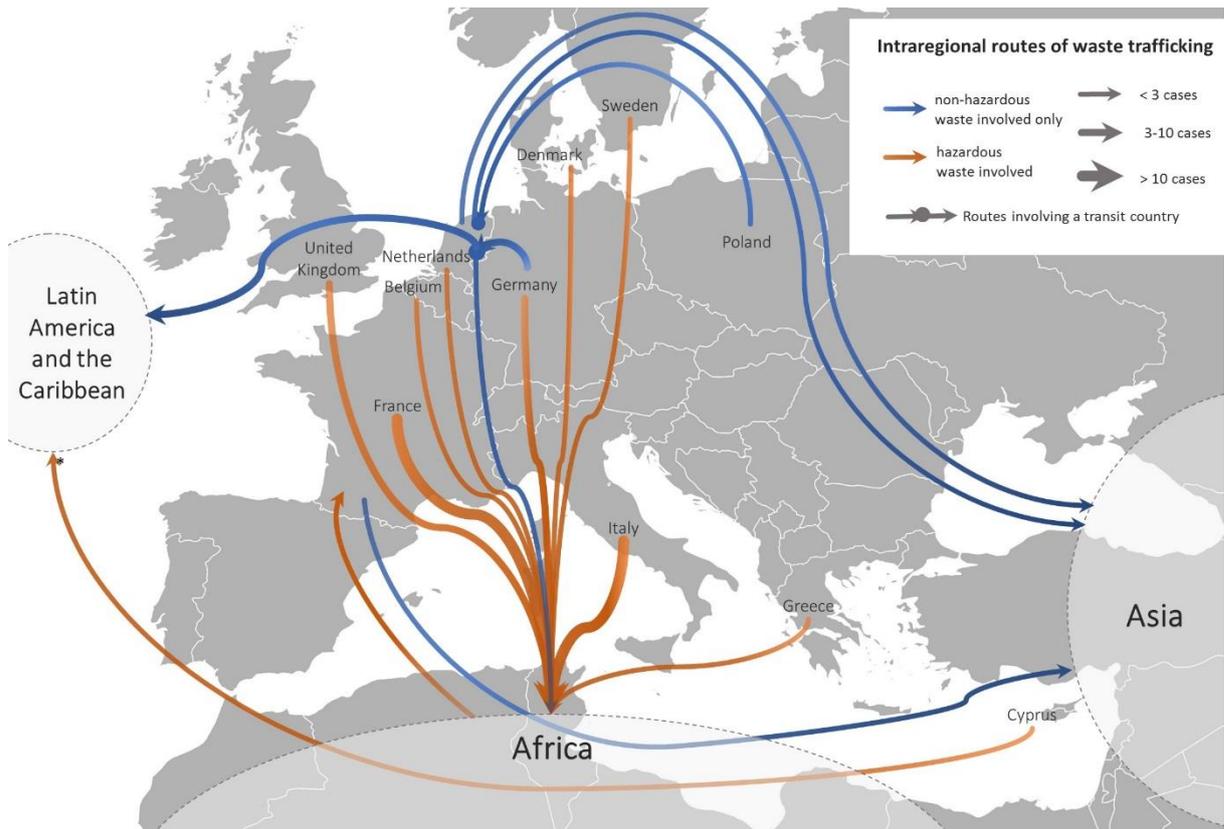
Annex 6: Regional Maps of waste trafficking routes



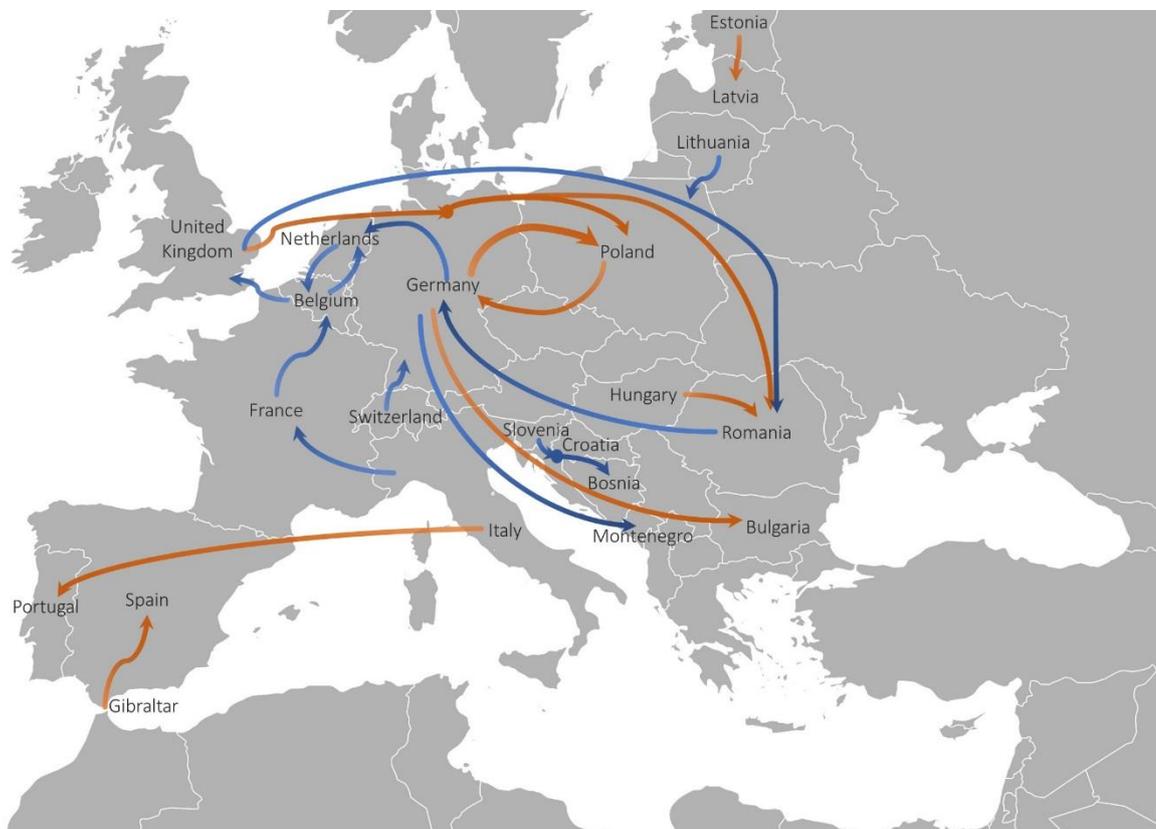
Map 7: Transcontinental and transboundary waste trafficking routes involving African countries



Map 8: Transcontinental and transboundary waste trafficking routes involving North, Central and South American countries and the Caribbean

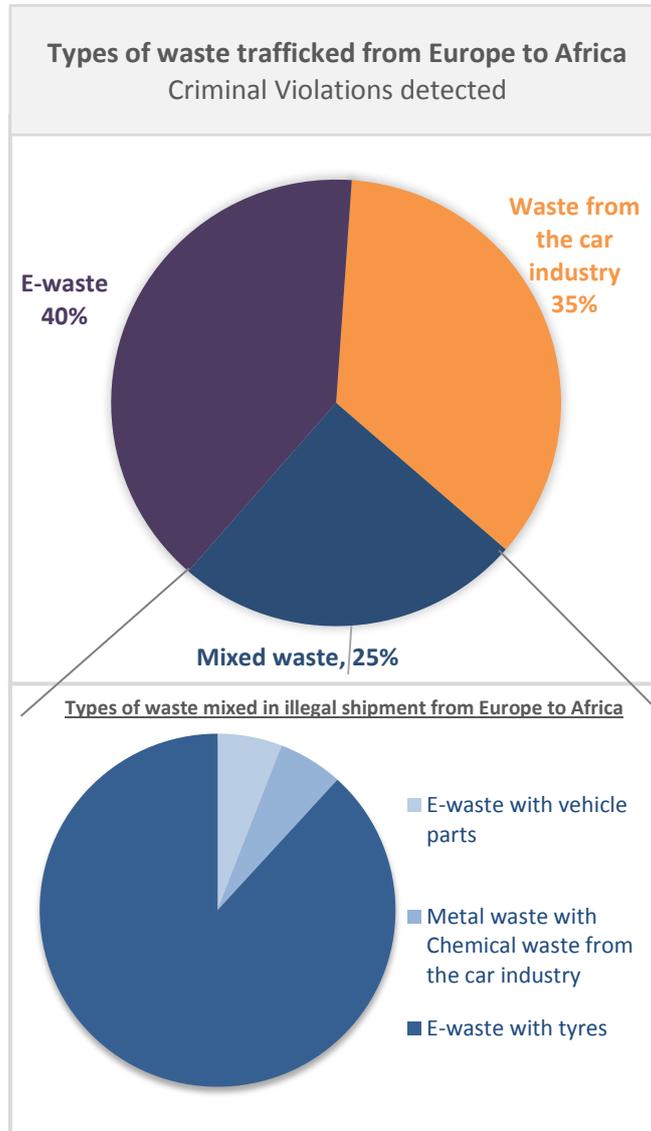


Map 9: Transcontinental waste trafficking routes involving European countries

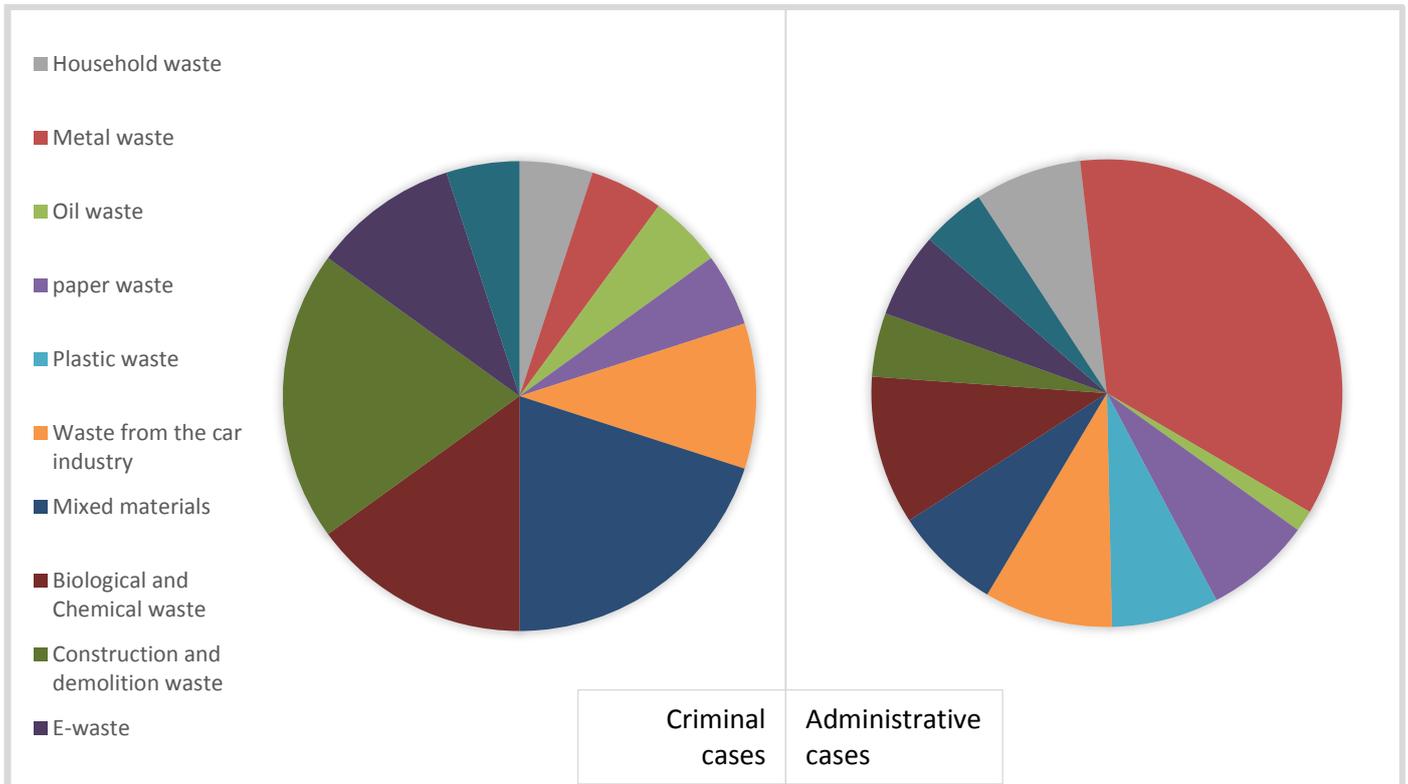


Map 10: Transboundary waste trafficking routes in-between European countries

Annex 7: Types of waste detected in illegal exports from Europe to Africa



Annex 8: Types of waste detected in intra-European illicit waste trade during Operation 30 Days of Action¹⁶



¹⁶ Data based on 21 criminal violations and 68 administrative violations detected during the Operation, with details provided on waste description.

Annex 9: Modus Operandi identified on illicit waste sites during Operation 30 Days of Action

Number of cases	Type of violation	Unspecified (or unconfirmed)	Number of cases with details on modus operandi	Declaration or paper work problem				Number of cases with details on waste activity	Unauthorised waste activity on site								Concealment methods				
				Missing authorization document or permit	Incorrect document	False declaration of waste types	False declaration on waste not declared at all		Fraudulent falsified document	1. Storage of waste without authorisation;	2. Dumping and disposal of waste without authorisation;	3. Burial of waste without authorisation;	4. Waste management without authorisation;	5. Mismanagement of waste without authorisation;	6. Commercial activity with waste without authorisation.	signs of crime converge/organised crime	concealment of waste	cases with additional information			
94	Criminal	8	86	27	0	0	1	3	63	11	24	3	15	4	5	5	6	10			
144	Administrative	4	140	35	2	2	0	0	51	32	22	0	0	12	3	1	5	5			
238		12	226	62	2	2	1	3	114	43	46	3	15	16	8	6	11	15			
94	Criminal	9%	91%	31%	0%	0%	1%	3%	73%	13%	28%	3%	17%	5%	6%	6%	7%	12%			
144	Administrative	3%	97%	25%	1%	1%	0%	0%	36%	23%	16%	0%	0%	9%	2%	1%	4%	4%			
238		5%	95%	27%	1%	1%	0%	1%	50%	19%	20%	1%	7%	7%	4%	3%	5%	7%			
Site of offense																					
Number of cases	Type of violation	Unspecified (or unconfirmed)	Number of cases with details on modus operandi	Declaration or paper work problem								Unauthorised waste activity on site								Concealment methods	
				Missing authorization document or permit	Incorrect document	False declaration of waste types	False declaration on waste not declared at all	Fraudulent falsified document	1. Legal site	2. Unauthorised site	3. Abandoned site or opened area;	4. Road side;	5. Agricultural land; property;	6. Private or commercial site;	7. Company or commercial site;	8. Discharge in water.	signs of crime converge/organised crime	concealment of waste	cases with additional information		
94	Criminal	8	86	6	2	2	12	3	4	3	3	5	8	14	0						
144	Administrative	4	140	86	2	2	0	0	2	32	5	2	4	36	3						
238		12	226	138	8	14	3	6	35	8	7	12	50	3							
94	Criminal	9%	91%	66%	7%	14%	3%	3%	5%	3%	3%	6%	9%	16%	0%						
144	Administrative	3%	97%	62%	1%	1%	0%	0%	1%	23%	4%	1%	3%	26%	2%						
238		5%	95%	64%	4%	6%	1%	3%	15%	4%	3%	5%	22%	1%							

All percentages are based on the number of cases providing details on modus operandi

Annex 10: Modus Operandi identified on illicit waste shipments during Operation 30 Days of Action

Number of cases	Type of violation				Type of route			Transportation mode		Unspecified (or unconfirmed)	Number of cases with details on modus operandi						
	Criminal	Administrative	Unspecified		Intraregional	Interregional	Intraregional	Transnational (unspecified)	Domestic		sea/maritime	road/land	unspecified	1. Missing document or permit	2. Incomplete paper work and administrative errors	3. False declaration of waste types (including misclassification and partial declaration)	4. False declaration of waste as non-waste or not declared at all
2			x						x	0%	100%	0%	0%	0%	0%	0%	0%
50	x	x		x						93%	11%	44%	20%	71%	6%	0%	0%
64	x	x		x						11%	90%	3%	39%	30%	17%	4%	13%
4	x	x							x	67%	33%	25%	0%	33%	0%	0%	0%
2	x	x							x	0%	100%	0%	-	-	-	-	-
120	x	x		x						37%	65%	21%	26%	54%	10%	2%	5%
138	x	x							x	36%	64%	1%	33%	29%	5%	0%	0%
15	x								x	0%	100%	0%	50%	0%	0%	0%	0%
102	x			x						80%	26%	3%	25%	2%	7%	78%	2%
29	x								x	21%	88%	17%	3%	28%	7%	11%	4%
4	x								x	-	100%	0%	0%	0%	0%	0%	0%
10	x								x	90%	10%	0%	0%	0%	0%	100%	0%
144	x	x		x						70%	36%	8%	33%	2%	7%	63%	2%
153	x	x							x	32%	68%	1%	35%	26%	4%	0%	0%
262	x	x		x						57%	49%	14%	31%	20%	8%	43%	3%
160	x			x					x	63%	43%	8%	33%	2%	6%	61%	2%
258	x	x		x					x	36%	65%	10%	28%	48%	9%	1%	4%
423	x	x		x					x	46%	56%	9%	30%	20%	7%	37%	3%

Number of cases	Type of violation				Type of route			Number of cases with details on modus operandi		Illegal activity					Concealment methods		
	Criminal	Administrative	Unspecified		Intraregional	Interregional	Transnational (unspecified)	Domestic	Unspecified	1. Waste unauthorised from authorities (unspecified)	2. Unauthorised waste movement (including import/export bans)	3. Commercial activity with waste without authorisation	4. Transport from/to an unpermitted site	5. Attempt to security rules (including overloading and contamination risks)	Signs of crime converging/organised crime	Mixing illegal waste with non-illegal waste (covered, wrapped, hidden)	
2			x						x	0%	0%	0%	100%	0%	0%	0%	0%
50	x	x		x						6%	9%	0%	0%	3%	0%	3%	3%
64	x	x		x						0%	0%	0%	0%	4%	0%	0%	0%
4	x	x							x	0%	67%	0%	0%	0%	0%	67%	0%
2	x								x	-	-	-	-	-	-	-	-
120	x	x		x						3%	8%	0%	0%	3%	2%	5%	2%
138	x								x	29%	0%	5%	0%	0%	0%	0%	0%
15	x								x	0%	0%	0%	100%	0%	50%	0%	0%
102	x			x						7%	72%	0%	0%	2%	1%	2%	1%
29	x								x	14%	11%	0%	18%	0%	7%	14%	0%
4	x								x	50%	25%	0%	25%	25%	0%	0%	25%
10	x								x	0%	89%	0%	0%	0%	0%	67%	0%
144	x	x		x						10%	59%	0%	5%	2%	1%	8%	5%
153	x	x							x	26%	0%	4%	9%	0%	4%	4%	0%
262	x	x		x						7%	5%	0%	3%	3%	1%	7%	4%
160	x			x					x	10%	6%	0%	6%	2%	2%	9%	5%
258	x	x		x					x	9%	6%	1%	0%	2%	1%	4%	1%
423	x	x		x					x	9%	36%	0%	3%	2%	1%	7%	3%

All percentages are based on the number of cases providing details on modus operandi

ABOUT INTERPOL

INTERPOL is the world's largest police organization. Our role is to assist law enforcement agencies in 192 member countries to combat all forms of transnational crime. We work to help police across the world meet the growing challenge of crime in the 21st century by providing a high-tech infrastructure of technical and operational support. Our services include targeted training, expert investigative support, criminal intelligence analysis, specialized databases and secure police communication channels.



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