



Enforcement of EU Waste Shipment Regulation

Coordinated audit in eight countries

Jerneja Vrabcic
The Court of Audit
of the Republic of Slovenia



Content

- Coordinated audit by 8 SAIs
- Audit approach
- Audit process
- Conclusions
- Recommendation
- Lessons learned





Coordinated audit by 8 SAIs

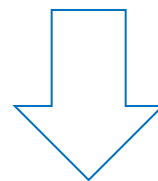


- Bulgaria (2012)
- Greece (2012)
- Hungary (2012)
- Ireland (2013)
- Norway (2012)
- The Netherlands (2012)
- Poland (2013)
- Slovenia (2013)



Coordinated audit by 8 SAIs

The main aim of the European waste shipment regulation (EWSR): preventing waste from being transported to facilities abroad that do not offer a sufficient degree of environmental protection



Audit objective: Providing insight into the enforcement strategies and performance of the participating countries and thereby contributing to improving the enforcement of the EWSR



Audit approach

- Covered period: 2008 – 2011
- Common audit approach (design matrix)
- Analysis of waste shipment flows, enforcement strategies, inspections and offences
- 8 national reports (4 reports available in English)
- Joint findings presented to various institutions (European Commission, IMPEL)
- Joint report published and presented to the Contact Committee of Heads of SAIS (11 October 2013)



Audit process

- All SAIs used a design matrix with audit questions
- Meetings:
 - The Hague (2011)
 - Warsaw (2012)
- Writing session by four SAIs in Budapest (2012)



Conclusions

Main conclusion: eight countries have implemented the EWSR, generally comply with its formal requirements, but there are wide discrepancies in the enforcement of the EWSR (e.g. number of inspections, interpretation of regulation and the way in which infringements are dealt with).

Differences in enforcement of the EWSR are not in line with the basic principle of a level playing field. Fewer inspections and milder sanctions in some countries increase risk of waste being shipped illegally and may result in improper treatment of waste.



Conclusions

- EWSR **implemented** in all 8 countries
- **Wide differences** in enforcement
- Enforcement policy **lacks underpinning by risk assessment**
- **Differences in resources and priorities**
- **Lack of coordination and cooperation** in enforcement network in some countries
- Problems with **classification of waste**
- Diverse enforcement instruments and **benefits from cooperation**



Conclusions

- Inadequate information management
- Little or no information on the effects of enforcement measures
- Wide discrepancies among 8 countries in the way in which infringements are penalized
- **Positive effects of national audits:** the authorities are taking steps to strengthen the enforcement of the EWSR



Recommendations

To countries:

- develop strategic planning to improve enforcement policy
- appoint adequate staff, allocate adequate resources, adopt proper training schemes and promote cooperation between authorities
- address and solve differences in the interpretation and classification of waste, prepare guidance for front line officers, produce conversion tables for converting Basel codes to customs codes



Recommendations

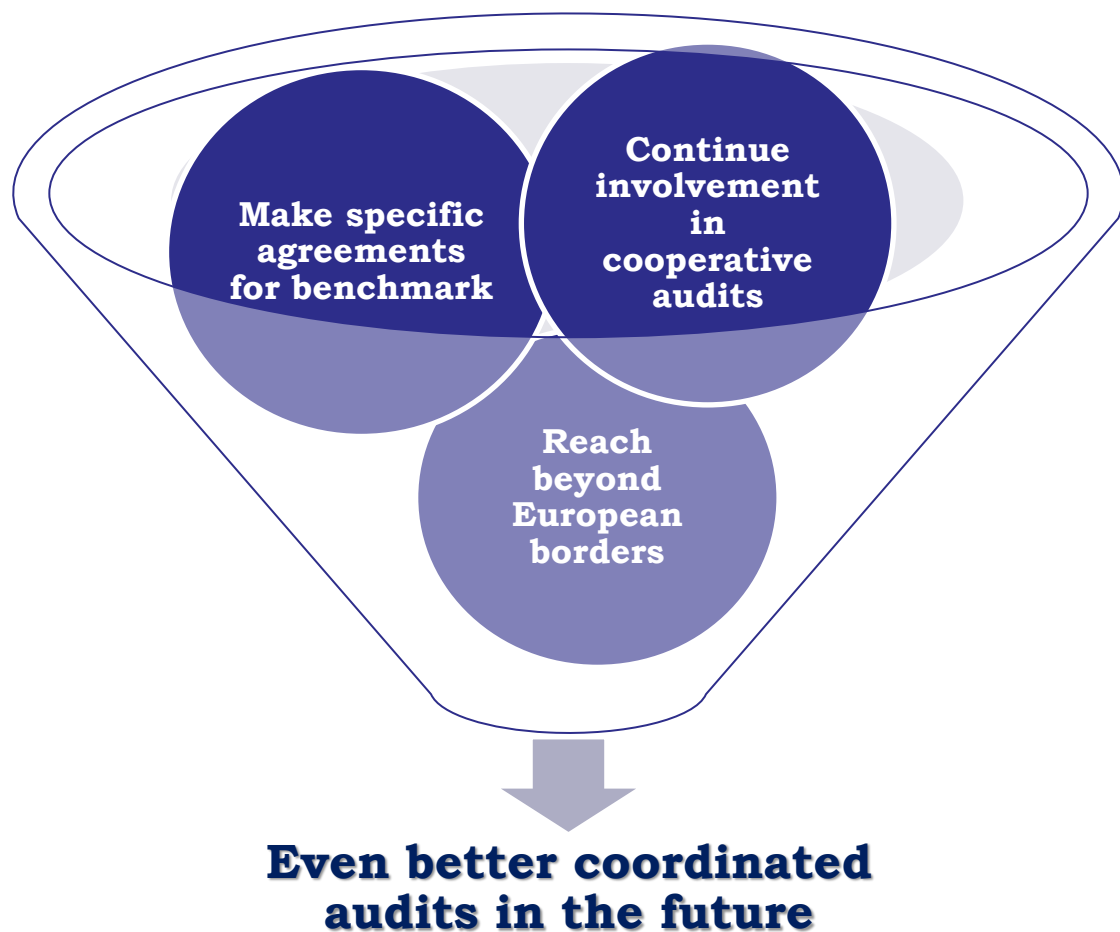
- intensify international cooperation and exchange of information and improve information management
- assess if sanction policy is proportionate and dissuasive

To the European Commission:

- facilitate the development of proper guidelines for identifying and classifying waste, implementation of conversion table and development of an European information stem for notifications and protocol for gathering statistical data



Lessons learned





Thank you for your attention

Information on coordinated audit on the
enforcement of the European Waste Shipment
Regulation:

www.rekenkamer.nl

J.vandeWardt@rekenkamer.nl