

Tackling illegal exports not without collaboration

Collectors meeting
Public conference
11 December 2019

Catherine VAN NIEUWENHOVE

HEAD OF WASTE SERVICE

DIVISION INSPECTORATE, POLLUTED SOILS AND ANIMAL WELFARE



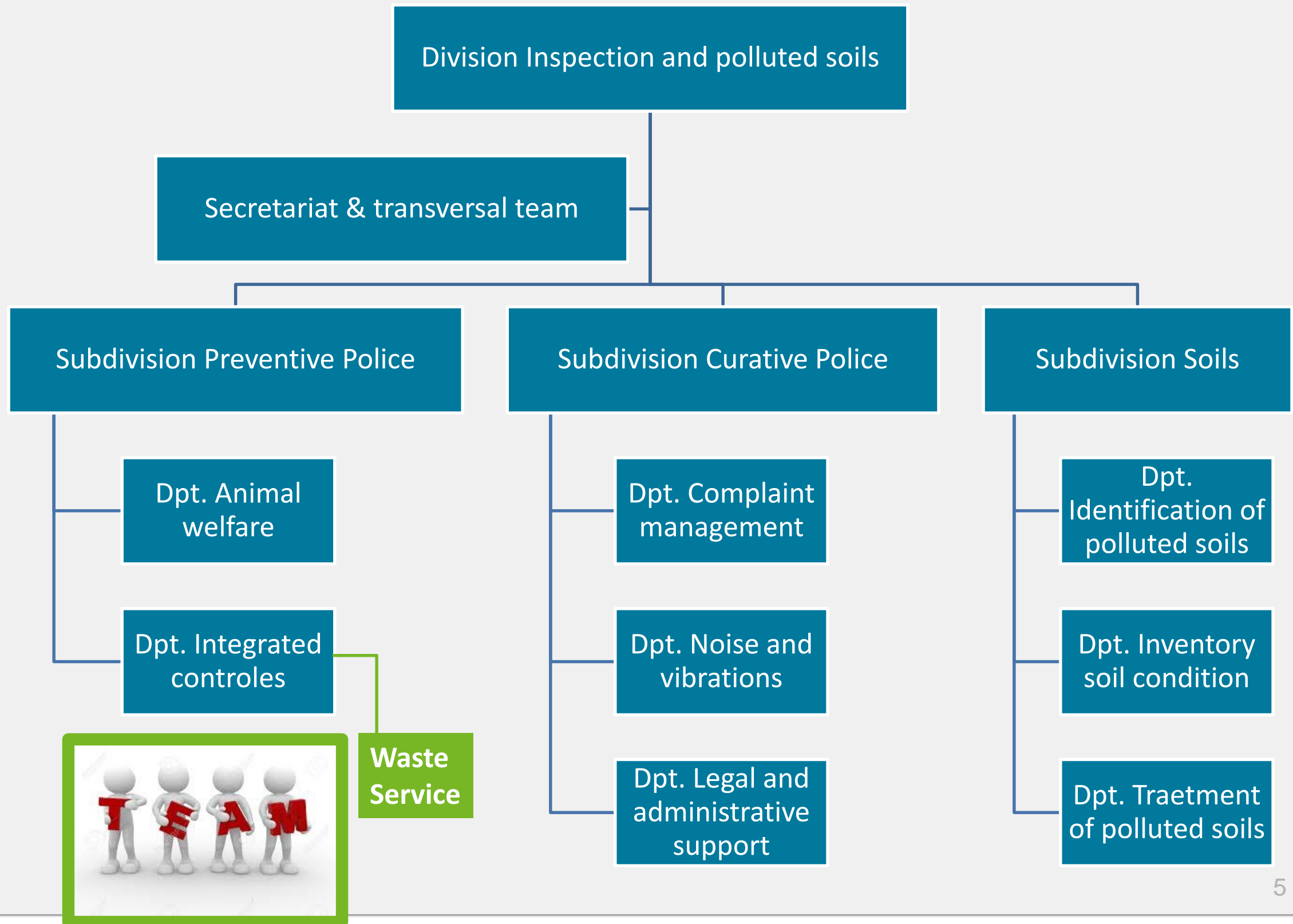


Bruxelles Environnement Leefmilieu Brussel Brussels Environment

A player on the move



OUR DIVISION

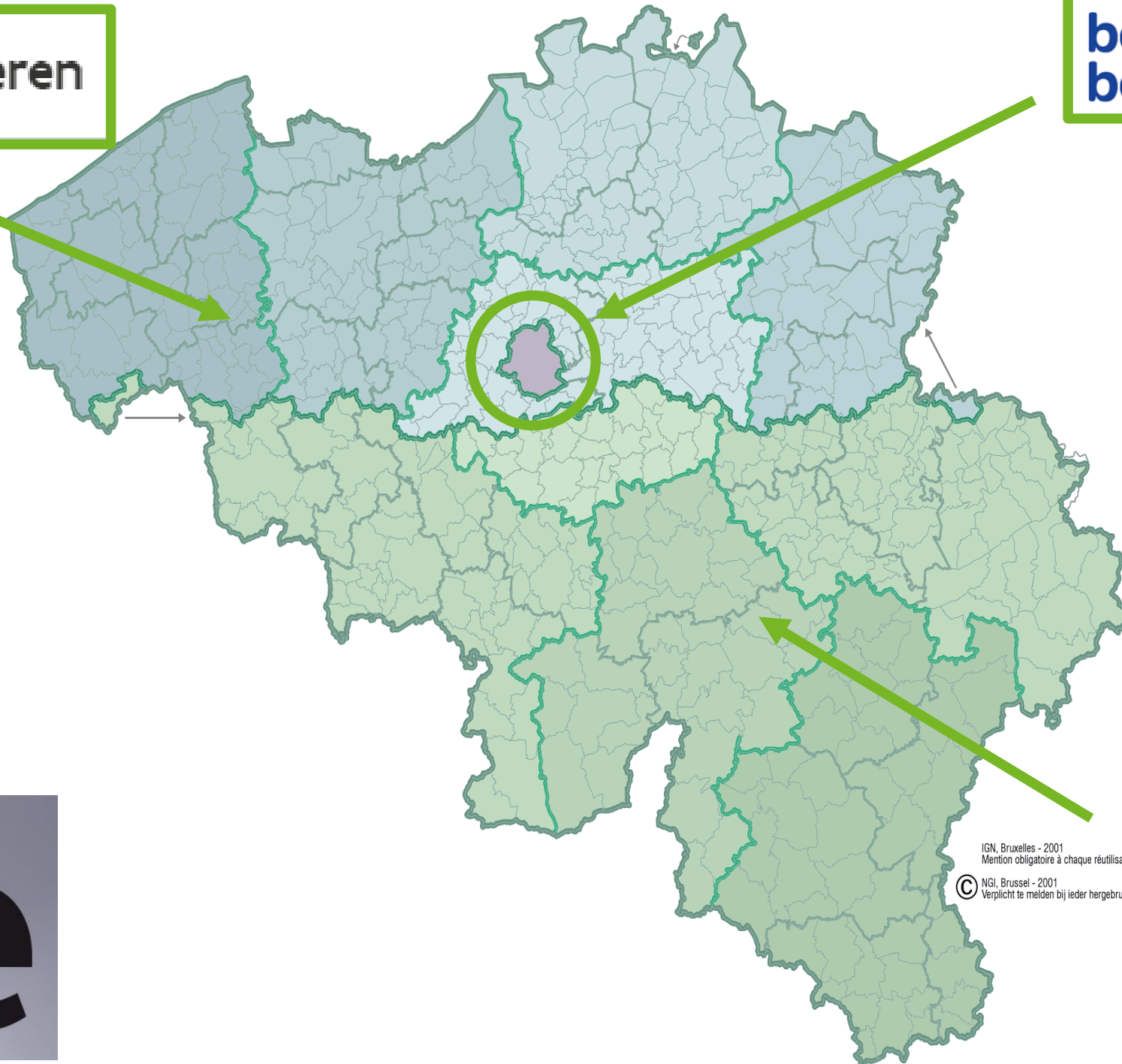




COLLABORATION IN BELGIUM



Vlaanderen



IGN, Bruxelles - 2001
Mention obligatoire à chaque réutilisation
© NGI, Brussel - 2001
Verplicht te melden bij ieder hergebruik



COLLABORATION IN BELGIUM

Cooperation agreement – parties

- Three regions
 - ❖ Brussels Capital Region
 - ❖ Flemish Region
 - ❖ Walloon Region
- Federal government
 - ❖ Internal affairs (Police)
 - ❖ Justice & Prosecution
 - ❖ Finances (Customs))
- Competent authority for transit of waste



CoWSR – consultative body

- Regular consultation meetings
- Special cases = > a joint approach
- Echange « *best practices* »
- Reporting
- Preparation of positions



COLLABORATION WITH EUROPE/WORLD





COLLABORATION WITH EUROPE/WORLD

Correspondent meetings

- European level (correspondent guidelines)



Competent authorities of European MS

- Exchange of information
- Return shipments



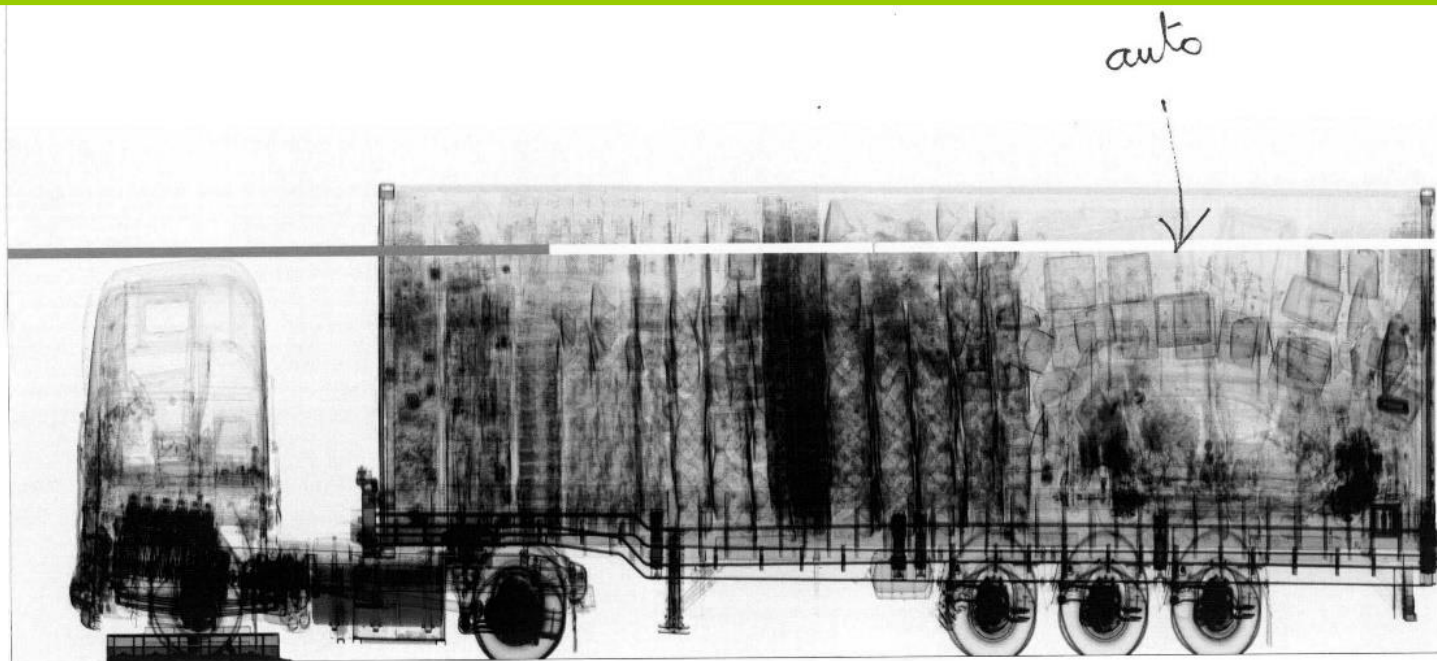
IMPEL TFS-WASTE

- Interpretation
- Training and manuals
- Network of inspectors





EXPORT OF WEEE



- Selection of container by
- Customs
 - Police
 - Colleagues inspectors

The exporter has to proof : USED EEE and not WEEE₈ !



USED EEE => PREPARED FOR REUSE

- **General requirements**

- ▶ Existing market
- ▶ Functionality & electrical security
- ▶ Testing

- **Specific requirements for certain used EEE**

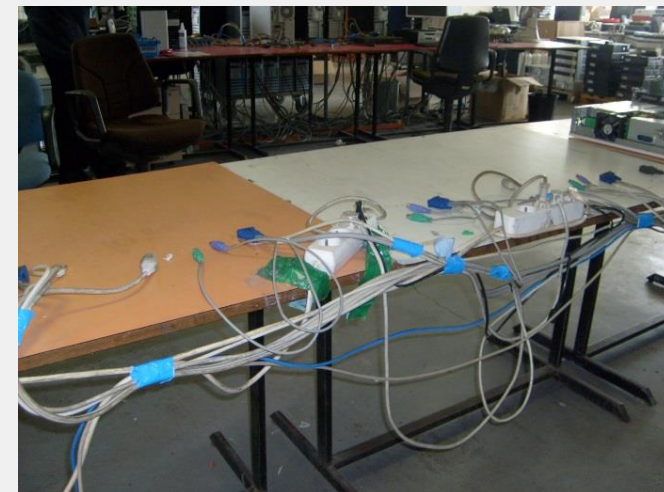
- ▶ Refrigerator/freezer/airco
- ▶ Washing machine/dish washer/dryer
- ▶ IT / Mobile phone
- ▶ ...

- **No reuse for**

- ▶ CRT-screens
- ▶ Cooling equipment with CFCs or HCFCs

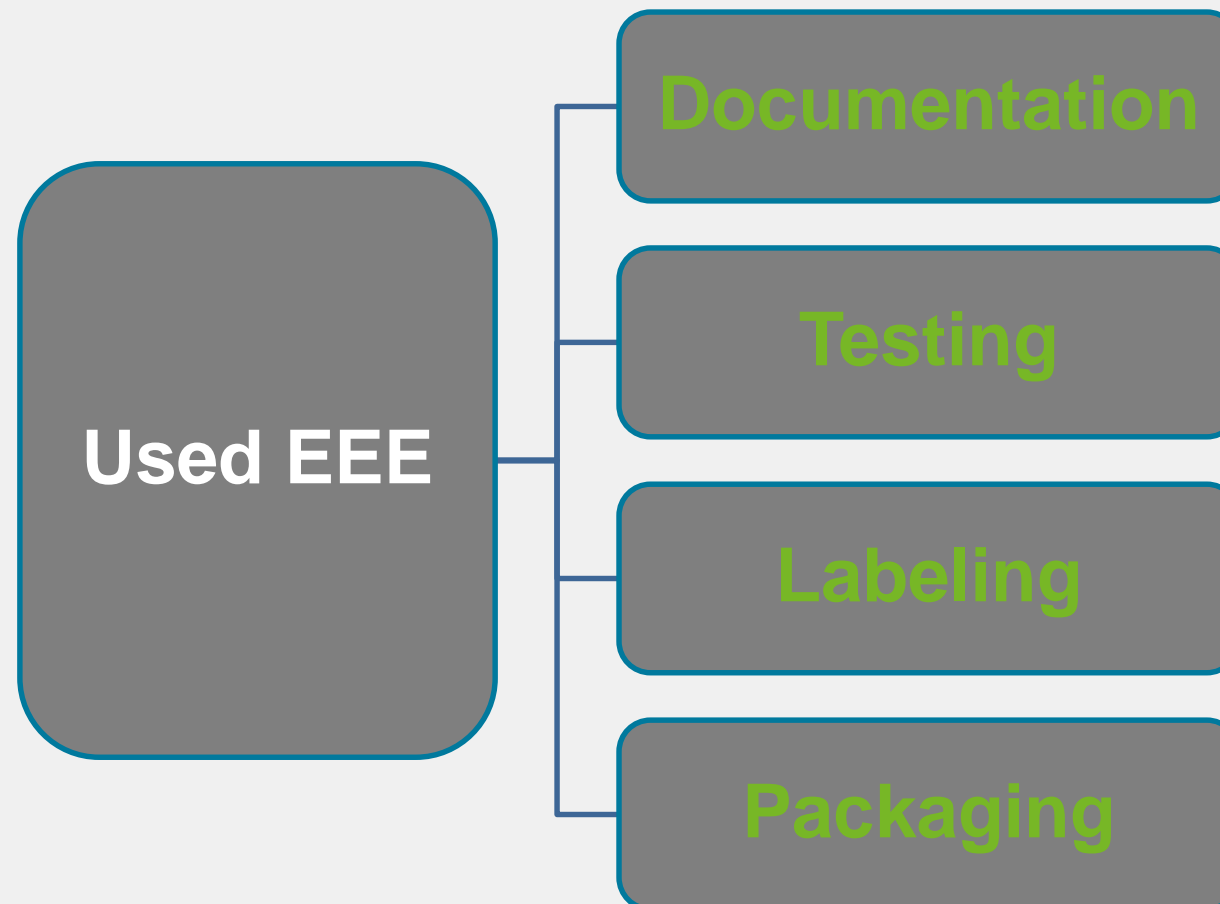
- **Authorised facility**

- ▶ Environmental permit « preparing for reuse »
- ▶ Professionnel competence
- ▶ Quality assurance system

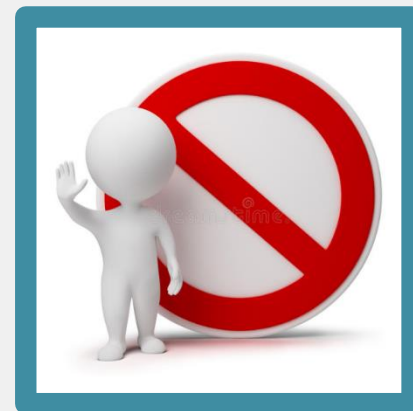




USED EEE *VERSUS* WEEE FOR EXPORT



**IF 1 CONDITION NOT FULFILLED →
WEEE → ILLEGAL SHIPMENT**





BURDEN OF PROOF FOR EXPORTER



Brussels Capital Region

France

expéditeur • Exemplaar voor afzender • Exemplar für Absender

VOITURE • VRACHTBRIEF • FRACHTBRIEF (CMR) B N° FEB 152008934

es, nonobstant toute clause contraire, à la Convention CMR.
 icht enig tegenstrijdig beding, onderworpen aan het CMR-Verdrag.
 gnachung unterliegt diese Beförderung den Bestimmungen des CMR-Übereinkommens.

missionnaire (nom, adresse, Etat) • Afzender of commissiionair (naam, adres, Staat)
 onder of Spediteur (Name, Anschrift, Staat)

BAL TRADING
 E DU ROET 108
 BRUSSEL

adresse, Etat) • Geadresseerde (naam, adres, Staat)
 (Anschrift, Staat)

1813
 2020

la marchandise (lieu, Etat, date, heure) • Inontvangstneming van de
 Staat, datum, uur) • Warenabnahme (Ort, Staat, Datum, Uhr)

13/08/2018

date, heure) • Aflevering (plaats, Staat, datum, uur)
 at, Datum, Uhr)

2020

transport • Transportgebonden kosten • Transportgebundene Kosten

nte • Wachtijden • Wartezeiten

LOSSEN

5 Transporteur principal (nom, adresse, Etat, n° de licence, plaque(s) d'immatriculation)
 Hoofdvervoerder (naam, adres, Staat, vergunningsnr., plaatnummer(s))
 Hauptfrachtführer (Name, Anschrift, Staat, Genehmigungsnr., amtliche(s) Kennzeichen)

JOHNNY & FREDDY CARTRANSPORT BVBA V44262
 Kegelstraat 3
 B - 2580 PUTTE - BEERZEL
 ☎ 0478 254 895
 ☎ 015 17 29 34
 BTW BE 0478.524.457

1-ASW-226

6 Transporteur sous-traitant (nom, adresse, Etat, n° de licence, plaque(s) d'immatriculation)
 Ondervervoerder (naam, adres, Staat, vergunningsnr., plaatnummer(s))
 Unterfrachtführer (Name, Anschrift, Staat, Genehmigungsnr., amtliche(s) Kennzeichen)

7 Transporteur succésail (nom, adresse, Etat, n° de licence, plaque(s) d'immatriculation)
 Opvolgende vervoerder (naam, adres, Staat, vergunningsnr., plaatnummer(s))
 Nachfolgender Frachtführer (Name, Anschrift, Staat, Genehmigungsnr., amtliche(s) Kennzeichen)

9 Réserves du transporteur lors de la prise en charge de la marchandise • Voorbehoud van de vervoerder
 bij de inontvangstneming van de goederen • Vorbehalte des Frachtführers bei der Warenabnahme

GM 244/2-BL-U

2.i. ST.-ROCH
 F 52340 BIESLES

2 Destinataire (nom, adresse, Etat) • Geadresseerde (naam, adres, Staat)
 Empfänger (Name, Anschrift, Staat)

BE
 Rue de
 sprit Le
 Tél: +3
 info@b

Flemish region

Ecuyer Computer Trading BVBA
 Kortrijkstraat 498, 8930 Menen
 BE 0832.262.869
 RPR Gent, afdeling Kortrijk

Ninoofsesteenweg, 637

1.700 DILBEEK
 BELGIQUE

Tél : +32(0)488/365.965

Tel.: 02 363 28 11 - Fax: 02 363 29 11
 RPR BRUSSEL / RPM BRUXELLES
 BTW/TVA BE 0415.962.823
 www.inp...

Germany

An der Fuchshöhle 9
 66740 Saarlouis
 Tel.: +33 607 50 67 09
 Email: frottini.us@gmail.com

Type	Size	INTERNAL NUMBER	SERIAL NUMBER	MERK	MODEL	STAND	emo	REMARKS
LED	13	TV14983/343	HKC13M4X20171200083	HKC	13M4	YES	YES	
LCD	13	TV14983/224	UNKNOWN	VD TECH	TQT-01310	YES	YES	
LCD	14	TV14983/417	DC1A0444108991	PHILIPS	14PF6826/01	YES	NO	
LCD	15	TV14983/387	BZ1A0740584473	PHILIPS	15PFL4122/10	YES	YES	
LCD	15	TV14983/404	HKC02103010001433	QMEDIA	Q15A2D	YES	NO	
LED	15	TV14983/333	1410161777	GRANDING	SV-156A5HD	YES	YES	
LCD	15	TV14983/388	BAN06107110002629	VIDEOSONIC	VLE156L8HA-TL	YES	YES	
LCD	15	TV14983/184	502MAQQ0A612	LG	RZ-15LA70	YES	YES	
LCD	15	TV14983/246	BZ1A0737481804	PHILIPS	15PFL4122/10	YES	YES	
LCD	15	TV14983/446	05456502001567	KEYSMART	TFT15L05	YES	YES	
LCD	15	TV14983/444	VN2B0608002944	PHILIPS	15PF4121/01	YES	YES	
LCD	17	TV14983/129	BZ000411586148	PHILIPS	170M4FS/00	YES	YES	
LCD	17	TV14983/447	V1023KFWB50417	SAMSUNG	LW17E34C	YES	YES	
LCD	19	TV14983/81	6331162	SONY	KDL-19BX200	YES	YES	
LCD	19	TV14983/94	6,45274E+12	MEDION	MD30190BE	YES	YES	
LCD	19	TV14983/136	FL33750123685	PROVIEW	JQ1930-XPD	YES	YES	
LCD	19	TV14983/82	57203HGP102927H	SAMSUNG	LE19R71BX/XEC	YES	YES	
LCD	19	TV14983/402	001MAKR3D885	LG	M19WDL	YES	YES	
LCD	19	TV14983/185	57203HHP304485M	SAMSUNG	LE19R71B	YES	YES	
LCD	19	TV14983/308	LS09083506205	MEDION	MD30289	NO	YES	
LCD	19	TV14983/403	ITIKCE151000737	PROLINE	LD1973D	YES	NO	
LED	19	TV14983/154	4,33011E+12	TRIS	LED TV 1904	YES	YES	
LCD	19	TV14983/461	803195.38508	D-VISION	LCD1901TNDVD	YES	NO	
LCD	19	TV14983/454	FZ1A1018001013	PHILIPS	19PFL3405H/12	YES	YES	
LCD	19	TV14983/416	100613820901	MEDION	MD 30190 BE-A	YES	YES	
LCD	19	TV14983/251	A0609239663	AKAI	ALD1930X	YES	YES	
LCD	19	TV14983/194	4020845	SONY	KLV-S19A10E	YES	YES	
LCD	19	TV14983/278	061224A3572	OPERA	TL19D061221	YES	YES	
LCD	20	TV14983/179	1,0063E+11	MEDION	MD20121BE	YES	NO	
LCD	20	TV14983/183	706300671	AQUOS	LC-20S5E-BK	YES	YES	
LCD	20	TV14983/311	606MADH2F890	SAMSUNG	20LC1R	YES	YES	
LCD	20	TV14983/298	AA083SDY503051E	SAMSUNG	LW20M21C	YES	YES	

Testreport



BURDEN OF PROOF FOR EXPORTER

When container is suspicious



1. Verification of place of loading
2. Identification of all the parties involved
3. **Required information to be provided by exporters**
4. If not **ALL** used **EEE** => **WEEE**
5. Unloading of the container in authorized facility
6. Destruction of the WEEE
7. Reloading of the container
8. Liberating the container
9. Legal report
10. Administrative fine



ILLEGAL SHIPMENT



❖ GENERAL RULE

- **Illegal shipment = Criminal offence**

❖ LEGAL REPORT

- Proces-verbal of infringement
- Administrative fine (50 EUR – 62500 EUR) (if no prosecution)

❖ EXTRA COST FOR OPERATOR/EXPORTER

- Cost of harbor (fee quay)
- Cost of storage
- Cost of unloading
- Cost of destruction



ILLEGAL SHIPMENT



POSITIVE

- proof is to be delivered by the exporting parties
- better legal framework for actions by inspectors
- inspection upstream : facilities « preparing for reuse »

NEGATIVE

- high number of parties involved
- rules not identical in all member states
- need to contact other competent authorities (IMPEL !)
- facilities not know
- time consuming
- « good » equipment is destroyed



NO COLLABORATION



NO RESULTS

Special thanks to colleagues

Jonas Eylenbosh

Nathalie Tacquenier

