



# Unwaste

## TRENDSPOTTING ALERT



*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.

### The many challenges faced by some destination countries regarding the waste trade make some nations an easy destination for illegal waste traders:



**Inadequate traceability due to limited inspection capacities and lack of traceability after the waste reaches the destination**



**Concealment, mislabelling or misdeclaration of shipments**



**Insufficient capacity for enforcement**



**Lack of adequate sanctions for illegal waste trade activities**



**The involvement of organized crime groups**

## 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:



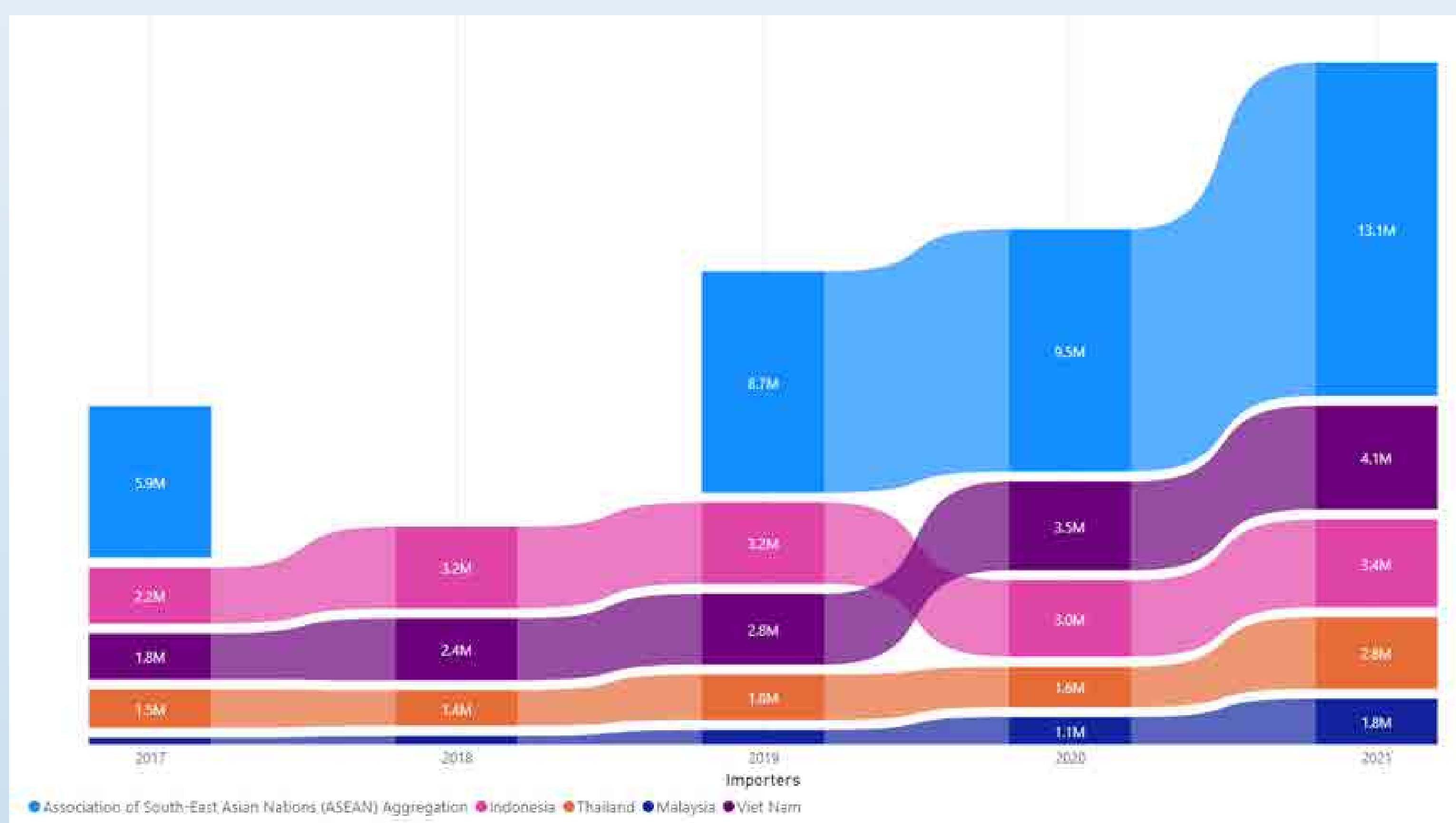
### Legal and illegal waste flows

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

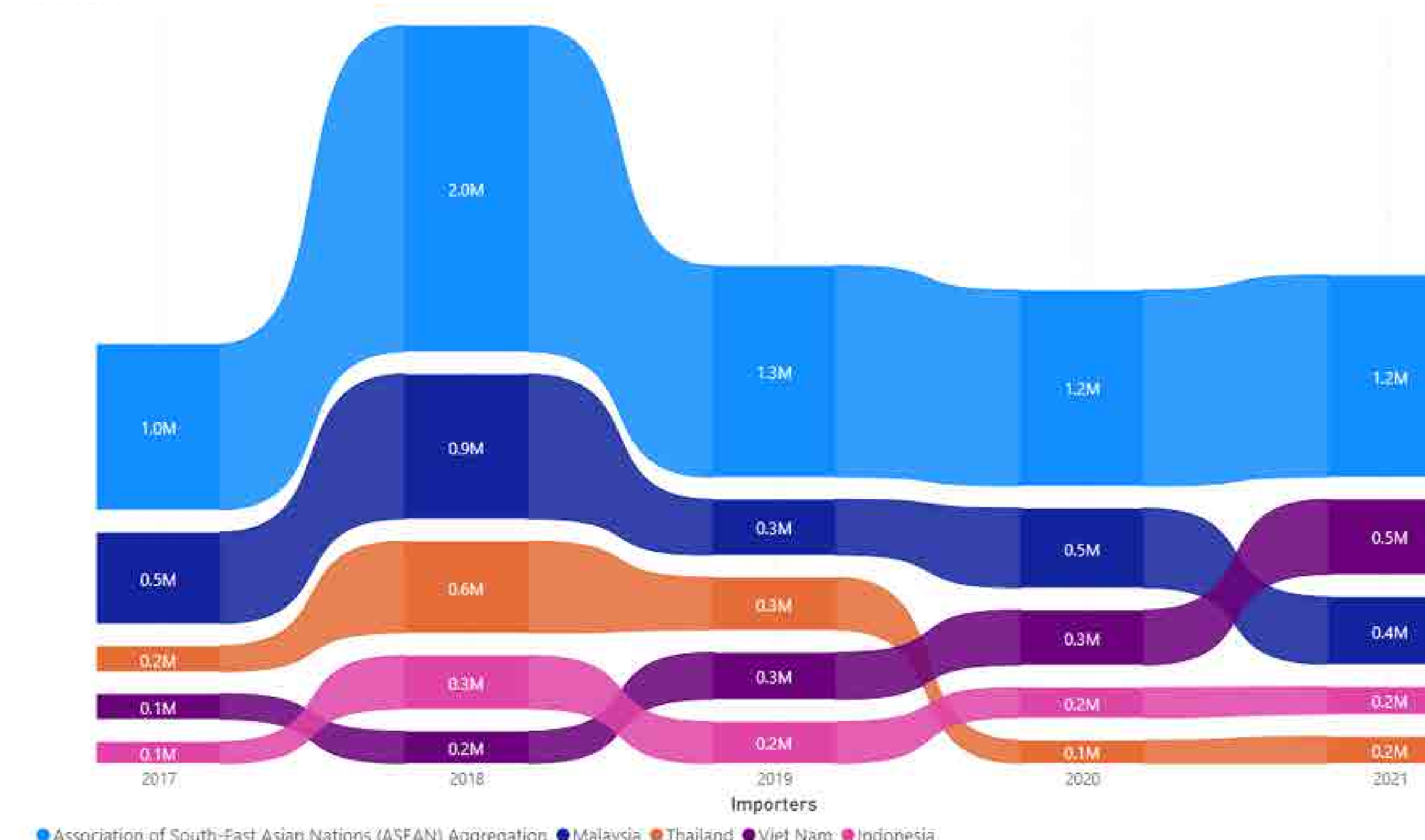
## PLASTIC – IMPACTS OF PLASTIC WASTE AMENDMENT... OR NOT?

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.

The adoption of the Basel [Plastic Waste Amendment](#), which became fully effective in January 2021, may result in changes in plastic waste flows in the coming months or years for the countries that are part of the Basel Convention. But there is no noticeable impact at the moment in the four focus countries.

**Plastic waste imports in ASEAN 2017-2021 by quantity (Tons)**



However, data trends for 2022 [4] reveal a slight increase in overall plastic waste imports in some countries in the region in the first quarter, when compared with the first quarter of 2021. This trend needs to be monitored. Additionally, in some destination countries, the waste management capacity has yet to align with the actual amount of waste received. This aspect will be further explored in a forthcoming *Unwaste* Trendspotting Alert.

Data Source: Trade Map

In 2019, the world generated 53.6 Mt of e-waste – an average of 7.3 kg per capita, which is an increase of almost 1 kg per capita from 2014. E-waste generation is expected to further increase globally, to 74.7 Mt in 2030 and to 110 Mt in 2050 [5]. In 2019 [6], the Southeast Asia region imported **1,139 kt** of e-waste and UEEE (based on 54-UNU keys classification), of which:

**713 kt** were hazardous e-waste imported under the Prior Informed Consent (PIC) procedure

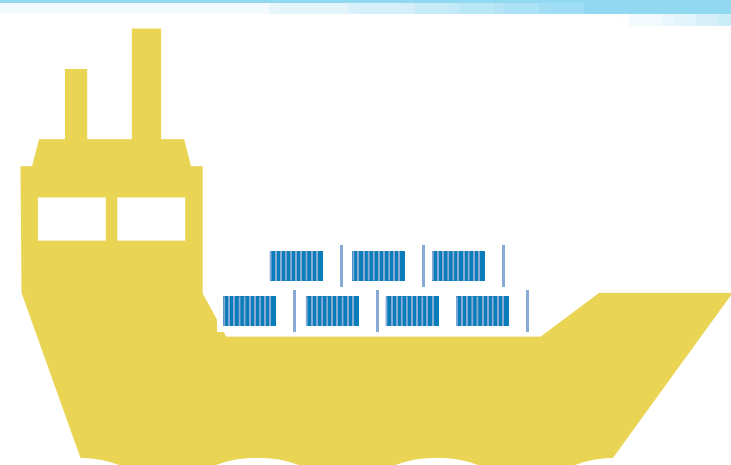
**180 kt** were undocumented e-waste or used-EEE

**118 kt** were high-value components, such as printed circuit board waste



The imported e-waste and used EEE correspond to **32 per cent of the e-waste generated** in the region. [7]

## METALS



From an initial assessment, **metal scrap** is among the main categories of hazardous waste reported by the four focus countries under the Basel Convention national reports, from 2017 to 2019 (*UNITAR elaboration of Basel Convention national reports under development*).

There are multiple HS codes for different types of metal scrap. A more in-depth analysis, including industrial waste and precious metals, will be presented in upcoming bulletins and in a future publication.

## IN-FOCUS: INDONESIA, MALAYSIA, THAILAND, VIET NAM

The *Unwaste* project will collect data and analyse transboundary movements of certain problematic waste streams in the four focus countries. The following section reports on the actions taken by these countries to tighten the flows of (legal and illegal) waste since the China Ban.

### INDONESIA

In 2019, the Ministry of Trade issued the [Minister Regulation Number 84 of 2019](#) to **update its waste import regulation**, stipulating the criteria of waste that is allowed to be imported, introducing the Registered Exporter terms and limiting the port of destination. The regulation has been amended several times, including a legal obligation for exporters to apply for the Certificate of Export, to provide a statement of willingness to be held responsible for the re-export of non-compliant waste and to update the procedure for export permit application. In 2020, the Government established an interagency [task force](#) consisting of several ministries and law enforcement agencies to monitor the importation of non-hazardous waste, including enforcement related to the illicit trade. It issued a [Joint Decree](#) to limit contaminants in imported waste to 2 per cent. In 2021, the Government issued the Minister of Trade Regulation No. 20 of 2021 that simplified the import provisions of various types of goods, including non-hazardous waste as a raw industrial material.

### MALAYSIA

The Malaysian Government issued a temporary halt on plastic waste imports in October 2018 and announced a permanent ban to be imposed in the future. The country tightened requirements for issuing permits, reinforced controls of containers and set up a dedicated task force in April 2019 to combat illegal waste imports and clamp down on recycling facilities operating without valid licenses and employing disposal methods harmful to the environment. Malaysia [shut down 170 illegal recycling factories](#) from January to November 2019. In December 2019, the country [ratified](#) the Basel ban amendment. More recently, the Malaysian Ministry of International Trade and Industry (MITI) published [Guidelines for the Importation and Inspection of Metal Scrap and Paper Waste](#), which came into force in January 2022. The MITI also [announced](#) the implementation of a two-year moratorium, effective 15 March 2022, for manufacturing license issuance.

### THAILAND

In July 2018, the Government [phased down](#) the import of plastic waste and e-waste by [halting](#) the issuance of new import permits for plastic waste. The Subcommittee for Integrative and Systematic Management of E-waste and Plastic Imports [announced](#), also in 2018, its intent to ban foreign plastic waste imports within the next two years. The Government has increased the number of controls on waste import and recycling companies. In early 2020, the new [Subcommittee](#) on Plastic and E-Waste Management, headed by the Minister of Natural Resource and Environment, was set up to advise, monitor and tackle plastic and electronic waste situation in Thailand. **Effective on 15 September 2020, Thailand issued a ban on 428 types of e-waste.** The plastic scraps ban, initially aimed for 2020, was postponed for five years. The subcommittee decided in 2021 to phase out plastic scraps imports, allowing up to 50 per cent of the production capacity, or no more than 250,000 tons in 2021, which will be reduced by 20 per cent each year until reaching the full ban as of 1 January 2026.

### VIET NAM

Viet Nam differentiates waste (cannot be recovered or re-used) from scrap (can be recovered for use as material) [8]. The Government stopped issuing licences for the import of paper, plastic, metal and other waste in 2018. In April 2019, the country declared its intention to ban plastic scrap imports by the end of 2025. The Ministry of Natural Resource and Environment set up an [inspection department](#) responsible for verifying scrap imports and authorized to revoke business licenses and permits in case of non-compliance. Viet Nam issued Decree No. 69/2018/ND-CP on guidelines for the Law on Foreign Trade Management, that list the used electronic goods banned from exporting or importing. Circular No. 11/2018/TT-BTTTT contains the detailed list of used information technology products prohibited from importing, with their HS codes. The [Law on Environmental Protection 2020](#) strictly forbids the “import, temporary import, re-export or transit waste from abroad in any form” and specifies requirements for scrap imports.



## EUROPEAN UNION - PROPOSED REGULATION ON WASTE SHIPMENTS

The European Commission proposed new rules in November 2021 for EU waste shipments to ensure that the EU Member States do not export their waste problem to third countries, to facilitate the transport of waste for recycling and to better tackle illegal waste shipments within the EU and between third countries and the EU. [9]

More information [here](#).



## HIGHLIGHTS FROM THE 15TH CONFERENCE OF PARTIES OF THE BASEL CONVENTION

The face-to-face segment of the meetings of the Conferences of the Parties to the Basel, Rotterdam and Stockholm Conventions (**BRS COPs**) took place from 6 to 17 June 2022. This concluded the marathon proceedings that started with an online segment in 2021. The COPs hosted a **Plastics Forum** dedicated to promoting the environmentally sound management of plastic waste.

### All e-waste – hazardous and non-hazardous – now subject to PIC procedure

Parties adopted landmark amendments to Annexes II, VIII and IX, which ensure that all transboundary movements of e-wastes, whether hazardous or not, are subject to the Prior Informed Consent (PIC) of the importing State and any State of transit. Find more information [here](#).

### Adoption of a set of new Technical Guidelines

The BC COP-15 also adopted technical guidelines on mercury wastes, as well as three updated technical guidelines on the environmentally sound management of wastes from Persistent Organic Pollutants (POPs).

### Unwaste side event

On 14 June 2022, UNODC and UNITAR organized the side event **Combating Illicit Waste Flows from the EU to Southeast Asia: Contributions to Sound Management of Waste and to the Implementation of the Basel Convention**, during which the *Unwaste* project was presented, in addition to experiences from Indonesia, Thailand and Italy and the role of international cooperation in combating waste trafficking. Key issues affecting receiving countries, such as challenges regarding identifying the origin of waste or containers, repatriation costs and the involvement of criminal networks in the exporting countries were highlighted by country representatives.



Panel at the *Unwaste* side event

## About the *Unwaste* project

*Unwaste* project aims to fight trafficking in waste between the EU and Southeast Asia by promoting cooperation and partnerships, in support of ongoing efforts towards a circular economy transition, in line with the relevant policy frameworks.

More information [here](#).

## PUBLICATIONS AND MEDIA

The following publications and news items relate to waste in Southeast Asia. They are largely drawn from desk research and information sent by stakeholders involved in the *Unwaste* project.

**UNODC:** *Combating Waste Trafficking – A Guide to Good Legislative Practices* (2022) is primarily intended for policymakers, legislators and the legislative drafters supporting them to enact and strengthen legislation

**OECD:** *Monitoring Trade in Plastic Waste and Scrap* (2022)

**WCO:** *Operation Demeter VII* (October 2021)

**ASEAN Secretariat:** *ASEAN Regional Action Plan for Combating Marine Debris in the ASEAN Member States (2021–2025)* (2021)

**Government of Denmark, UNDP and the Indonesian Government:** *The Economic, Social and Environmental Benefits of a Circular Economy in Indonesia* (2021)

**World Bank Group:** *Market Study for Malaysia: Plastics Circularity Opportunities and Barriers. Marine Plastics Series, East Asia and Pacific Region and Market Study for Thailand: Plastics Circularity Opportunities and Barriers* (2021)

**UN-ESCAP:** *Plastic Waste in Southeast Asia. Urban Case Studies* (2020)

**UNEP:** *The Role of Packaging Regulations and Standards in Driving the Circular Economy* (2019)

**EcoWaste Coalition:** *Waste Trade in Southeast Asia. Legal justifications for regional action. 2021 Report* (2021)

**Basel Action Network:** *Basel Plastic Waste Trade Violations Rampant One Year After Amendments Entry into Force* (2022)

**Webinar: Addressing waste trafficking in Asia-Pacific through regional cooperation - with RILO AP:** *recordings and presentation 1 -2*



## NOTES

**[1]** European Commission, “Questions and Answers on New EU Rules on Waste Shipments”, [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_21\\_5918](https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_5918)

**[2]** INTERPOL, Strategic Analysis Report: Emerging Criminal Trends in the Global Plastic Waste Market Since January 2018, 2020, [www.interpol.int/content/download/16123/file/Public%20INTERPOL%20Report%20criminal%20trends-plastic%20waste.pdf](http://www.interpol.int/content/download/16123/file/Public%20INTERPOL%20Report%20criminal%20trends-plastic%20waste.pdf)

**[3]** Including but not limited to Trade Map, Eurostat, UNITAR internal dataset on e-waste, ASEANstats and Basel Convention national reports

**[4]** Trade Map

**[5]** See [https://ewastemonitor.info/wp-content/uploads/2020/11/GEM\\_2020\\_def\\_july1\\_low.pdf](https://ewastemonitor.info/wp-content/uploads/2020/11/GEM_2020_def_july1_low.pdf)

**[6]** E-waste data for Southeast Asia is only available for 2019.

**[7]** See Global Transboundary E-waste Flows Monitor 2022 <https://ewastemonitor.info/gtf-2022/>

**[8]** Waste is a substance that is discharged from production, business, service, daily life or other activities. Scrap is a material that is recovered, classified and selected from materials and products discarded in the process of production, business, service or consumption to use as materials for another production. See [www.env.go.jp/en/recycle/asian\\_net/Annual\\_Workshops/2021\\_PDF/Presentations/2\\_Country%20update%20and%20response%20to%20plastic%20amendment/Vietnam.pdf](http://www.env.go.jp/en/recycle/asian_net/Annual_Workshops/2021_PDF/Presentations/2_Country%20update%20and%20response%20to%20plastic%20amendment/Vietnam.pdf)

**[9]** European Commission, “Proposal for a New Regulation on Waste Shipments”, 17 November 2021, [https://ec.europa.eu/environment/publications/proposal-new-regulation-waste-shipments\\_en](https://ec.europa.eu/environment/publications/proposal-new-regulation-waste-shipments_en)