



INTERPOL

ENVIRONMENTAL SECURITY SUB-DIRECTORATE

## Questionnaire B

To enhance the abilities of the INTERPOL member countries to combat the illegal trade in electronic waste (also known as e-waste or WEEE), INTERPOL and its partners have launched the Countering WEEE Illegal Trade (CWIT) project, which receives funding from the European Community's Seventh Framework Programme. One of the key aims of the CWIT project is to provide a set of recommendations to support law enforcement authorities, including police, customs and environmental agencies, in countering the illegal trade in e-waste within and from Europe. For more information, please visit the CWIT website: [www.cwitproject.eu](http://www.cwitproject.eu).

The INTERPOL Environmental Security Sub-Directorate, in close collaboration with other CWIT project partners, has developed this questionnaire to be completed by law enforcement officials in INTERPOL member countries. The purpose of this questionnaire is to collect information on the *modi operandi* and characteristics of entities involved in the trade of e-waste. The information supplied will remain within the secure domain of the INTERPOL General Secretariat. **Only a composite analysis will be provided to the members of the CWIT project to be used within the context of the project (e.g. for the development of policy and enforcement recommendations).**

We are grateful for your assistance in filling out this questionnaire. Please provide your contact details below.

Name of officer: .....

Title/Role: .....

Agency: .....

Email: .....

Contact Telephone: .....

Country:.....

**For more information please contact:**

Environmental Security Sub-Directorate, E-mail: [environmentalcrime@interpol.int](mailto:environmentalcrime@interpol.int)

## Part 1: Court Decisions on Illegal Trade in Waste and e-Waste

*In this section we would like to gain knowledge on the court decisions/case law related to illegal trade in waste and e-waste in particular, to gain knowledge on the application of the existing legislation and its effectiveness.*

Q1: Have there been court decisions/cases regarding offences related to trade in **waste** in the last 5 years? *Please indicate how many and where possible provide some detail.*

2009:

Number .....

Details .....

- No
- Unknown

2010:

Number .....

Details .....

- No
- Unknown

2011:

Number .....

Details .....

- No
- Unknown

2012:

Number .....

Details .....

- No
- Unknown

2013:

Number .....

Details .....

- Unknown

Q2: How many of these decisions are related to **e-waste** in particular?

*Please indicate how many and where possible provide some detail. **In the details, please provide how many related to individuals and how many related to companies.***

2009:

Number .....

Details .....

- Not applicable
- Unknown

2010:

Number .....

Details .....

- Not applicable
- Unknown

2011:

Number .....

Details .....

- Not applicable
- Unknown

2012:

Number .....

Details .....

- Not applicable
- Unknown

2013:

Number .....

Details .....

- Not applicable
- Unknown

Q3: Is there legislation that covers international trade in waste in your country?  
*Mark only one box. If yes, please provide the Act and Section*

- Yes - Act and Section: .....
- No
- Unknown

Q4: Please explain what constitutes the elements of the offence(s), including physical and mental elements. *For example is there a requirement in the legislation that there must be guilty intent on the part of the offender?* Select all that apply:

- Mens rea – guilty intent to commit a crime
- Actus reus – commitment of an illegal act
- Unknown

Q5: What are the different types of penalties available for offence(s) related to trade in **e-waste** in your country? When are these penalties applied – for what offence?

- Fine (to an individual or a company)

Applied .....

- Probation

Applied .....

- Imprisonment

Applied .....

- Confiscation of property/assets

Applied .....

- Suspension/revocation of licenses

Applied .....

- Requirement to remediate

Applied .....

- Restrictions to future related employment

Applied .....

- Other, please specify

Applied .....

- Unknown

Q6: Where cases of e-waste related offences have been successfully prosecuted in court, please provide details on the level of sentences/fines/other sanctions or penalties imposed by the courts.

2009:

Sentence/s .....

- Not applicable
- Unknown

2010:

Sentence/s .....

- Not applicable
- Unknown

2011:

Sentence/s .....

- Not applicable
- Unknown

2012:

Sentence/s .....

- Not applicable
- Unknown

2013:

Sentence/s .....

- Not applicable
- Unknown

Q7: Is it possible, under the national legislation, to detain waste in transit in your country?

*If yes, please explain the circumstances where this might occur and relevant regulation/legislation.*

- Yes .....
- No
- Unknown

Q8: We are interested in exploring the involvement of criminal groups in the illegal trade in waste. Of those individuals identified as being involved in the illegal trade in waste or e-waste, how many were part of a criminal network/group involved in these violations over the last 5 years?

*If possible, please provide details on the criminal network/group, including: how many members are known to be part of this network/group and are they known to be involved in other crime areas*

- None
- Unknown

Q9. Did any court decisions/case law related to illegal trade in waste also involve any elements of organized crime? *UN Convention against Transnational Organised Crime 2000 definition, "A structured group of three or more persons existing over a period of time and acting in concert with the aim of committing one or more serious crimes or offences [...] in order to obtain, directly or indirectly, a financial or other material benefit"* .

- Yes
  
- None
- Unknown

Q10: Are there provisions in the national legislation related to the prosecution of individuals involved indirectly in the crime (such as conspiracy to commit and/or aiding, abetting or facilitating the commission of said offence)?

- Yes
  
  
  
  
  
  
  
  
  
  
- No
- Unknown

Q11: Who initiated the investigation which resulted in the successful prosecution of such case(s)? Which agencies were involved? *e.g. customs, law enforcement, environmental inspectorate etc.*

- Unknown

Q12: Are there any court decisions/case law relating to the seizure or confiscation of the profits (assets, funds, properties, etc.) deriving from offences related to trade in e-waste/e-waste components? *Mark only one oval.*

- Yes
  
  
  
  
  
  
  
  
  
  
- No
- Unknown

Q13: Could you provide an estimate of the percentage of all containers physically inspected at the borders of your country annually?

- Not applicable
- Unknown

Q114: If available, kindly provide any other statistics from the last 5 years that you deem appropriate and important.

## Part 2: Modalities used in illegal trade of e-waste

*In this section we would like to gain more knowledge on the modes of transport used for the illegal trade of e-waste and related activities and on the profile of persons involved in these activities. Please, answer on the basis of the cases investigated/prosecuted.*

Q1: How does illegal e-waste mostly enter your country?

*Check all that apply and provide detail where possible.*

- Air .....
- Road .....
- Train .....
- Maritime Transport .....
- Inland Waterways .....
- Other, please specify.....
- Unknown
- Not applicable



Q2: How is illegal e-waste mostly transported or distributed within your country?

*Check all that apply.*

- Air .....
- Road .....
- Train .....
- Maritime Transport .....
- Inland Waterways .....
- Other, please specify.....
- Unknown
- Not applicable

Q3: Are there any local or regional “hubs or hotspots” for such illicit activities, for example, border-crossing points, major ports of entry and exit, etc. ? Please provide details.

- Yes
  
  
  
  
  
  
  
  
  
  
- No
- Unknown

Q4: What criteria are used to distinguish used electrical and electronic equipment (second-hand equipment) from waste electrical and electronic equipment (e-waste)?

- Unknown

## **Section 2A - Import**

Q5: How many **legal imports** of e-waste have occurred in your country? What was the total quantity, volume and value of the imports (please provide the volume number in tonnes)?

*Please explain how the volume / value was determined.*

### **2009**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

### **2010**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

### **2011**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2012**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2013**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

Q6: What was the total quantity, volume and value of e-waste shipments detected as they were being **illegally imported** into your country (please provide the volume number in tonnes)?

*Please explain how the volume / value was determined.*

**2009**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2010**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2011**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2012**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2013**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

Q7: Of the illegal shipments detected, please indicate the percentage of e-waste that was destined for your country and the percentage of e-waste that was in transit?

2009: .....

- Not applicable
- Unknown

2010: .....

- Not applicable
- Unknown

2011: .....

- Not applicable
- Unknown

2012: .....

- Not applicable
- Unknown

2013: .....

- Not applicable
- Unknown

Q8: In cases where your country was listed as the final destination, identify the origin of e-waste shipments detected during import.

Countries:

- Not applicable
- Unknown

Q9: In cases where your country was listed as a transit country, identify the origin of e-waste shipments detected during import.

Countries:

- Not applicable
- Unknown

Q10: What types of e-waste have been intercepted for illegal import in your country? *Please select all that apply.*

- Large household appliances (for example: washing machine, dishwasher, microwave, cooker)
- Cooling and freezing equipment (for example: refrigerators, freezers, air conditioning)
- Small household appliances (for example: toaster, vacuum cleaners, kitchen appliances, etc...)
- IT Equipment (for example: computers, laptops, telephones)
- Lamps (compact fluorescent lamps)
- Screens (LCD and Cathode Ray Tube televisions, monitors)
- Professional Equipment (non-household such as photocopiers, computer servers, etc...)

Of those selected which is the commodity most commonly detected?

Q11: Have illegal shipments arrived as a combination of the above categories or as mixed waste?

- Yes .....
- No
- Unknown

Q12: What types of e-waste **fractions** have been intercepted for illegal import? *Please check all that apply.*

- Printed circuit boards
- Compressors
- Batteries
- Plastic
- Cables
- Other, please explain: .....

Q13: Typically, how does e-waste illegally enter the country?

*Check all that apply and provide any available detail*

- Non-declaration .....
- Misclassification (i.e. wrong HS code) .....
- False import permit .....
- Hidden behind cover load (as a concealment technique) .....
- Other, please explain .....
- Unknown

Q14: How are shipments generally inspected?

- Non-intrusive inspection (NII), e.g. X-ray
- Manual and visual, e.g. opening containers
- Cargo tracking
- Satellite imaging
- Other, please explain

Q15: If items are imported declared as used electrical and electronic equipment intended for re-use, what percentage is tested to determine if it is functional? (% in number of shipments)

- Unknown

## **Section 2B - Export**

Q16: How many **legal exports** of e-waste have occurred in your country? What was the total quantity, volume and value of the exports (please provide the volume number in tonnes)?

*Please explain how the volume / value was determined.*

**2009**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown



**2010**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2011**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2012**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2013**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

Q17: What was the total quantity, volume and value of e-waste shipments detected as they were being **illegally exported** from your country (please provide the volume number in tonnes)?

*Please explain how the volume / value was determined.*

**2009**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2010**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2011**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2012**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

**2013**

Quantity: .....

Volume: .....

Value: .....

Details: .....

- Not applicable
- Unknown

Q18: If items are exported declared as used electrical and electronic equipment intended for re-use, what percentage is tested to determine if it is functional? (% in number of shipments)

- Not applicable
- Unknown

Q19: What were the declared destinations of illegal e-waste shipments?  
Countries (additional details, if available):

- Not applicable
- Unknown

Q20: What types of e-waste have been intercepted in your country that were intended for illegal export?  
*that apply.*

- Large household appliances (for example: washing machine, dishwasher, microwave, cooker)
- Cooling and freezing equipment (for example: refrigerators, freezers, air conditioning)
- Small household appliances (for example: toaster, vacuum cleaners, kitchen appliances, etc...)
- IT Equipment (for example: computers, laptops, telephones)
- Lamps (compact fluorescent lamps)
- Screens (LCD and Cathode Ray Tube televisions, monitors)
- Professional Equipment (non-household such as photocopiers, computer servers, etc...)

Of those selected which is the commodity most commonly detected?

Q21: Have illegal shipments arrived as a combination of the above categories or as mixed waste?

- Yes .....
- No
- Unknown

Q22: What types of e-waste **fractions** have been intercepted for illegal import? *Please check all that apply.*

- Printed circuit boards
- Compressors
- Batteries
- Plastic
- Cables
- Other, please explain: .....

Q23: Typically, how is e-waste illegally exported from the country? *Check all that apply.*

- Non-declaration .....
- Misclassification (i.e. wrong HS code) .....
- False import permit .....
- Hidden behind cover load (as a concealment technique) .....
- Other, please explain .....
- Unknown

## Section 2C - Entities and offenders involved

Q24: Please provide details on the type of individual offenders or groups involved in illegal activities around e-waste. Please also list countries involved if known. Please select all that apply.

WEEE/e-waste dealers/brokers Import  Transit  Export

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Transport companies Import  Transit  Export

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Terminal operators (e.g. port terminals) Import  Transit  Export

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Customs brokers Import  Transit  Export

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WEEE/e-waste collection organisations/facilities Import  Transit  Export

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WEEE/e-waste management organisations Import  Transit  Export

(including producer compliance schemes)

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WEEE/e-waste treatment facilities Import  Transit  Export

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Refurbishers Import  Transit  Export

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Other (including private individuals) Import  Transit  Export

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Q25: If private companies are involved in illegal activities around e-waste, please specify their primary legitimate activity, their role in the illegal trade in e-waste, and what country(ies) they are registered in.

- Not applicable
- Unknown

Q26: Have public officials been identified as being involved in illicit activities related to the import or export of waste (prosecuted cases only). Please specify which administration/office they belonged to (e.g. ministry, municipality, police, customs, environmental inspectorate, etc.).

- Yes

- Not applicable
- Unknown

Q27: Are activities linked to the illegal trade in waste/e-waste linked to any other illegal activities?

- Theft of goods and assets (cargo, vehicles etc.)
- Other pollution crimes
- Tax evasion (including duty, excise, VAT, corporate tax etc.)
- Document forgery
- Corruption / bribery / kickbacks (namely business-to-government, or business-to-business, or government-to-government – violating national regulations)
- Use of false companies (in a way which violates national regulations)
- Money laundering
- Exploitation of illicit labour (e.g. children, prisoners or immigrants without work permits)

- Identity theft (person or company)
- Cybercrime
- Narcotics trafficking (e.g. cocaine, heroin, or synthetic illicit drugs)
- Trafficking and/or production of counterfeit products
- Trafficking in endangered species (CITES violations)
- Trafficking of small arms or light weapons
- Trafficking of weapons of mass effect / mass destruction (e.g. chemical, biological, radiation, nuclear, or explosives)
- Sabotage against the supply chain system
- Direct acts of terrorism within the supply chain
- Hijacking of goods and assets (for ransom, e.g. truck hijackings or sea piracy)
- Use of intimidation or violence
- Kidnapping
- Human trafficking or people smuggling
- Any other crime types ?

*Please elaborate*



### **Part 3 - Best Practices**

*In this section we would like to gain more knowledge on best practices that are in place or envisaged in your country for countering illegal trade in e-waste.*

Q1: Is there any specialised training for the detection of illegal trade in waste and related offences in your country?

- Yes
  
- No
- Unknown

Q2: Is there any specialised training for investigating and prosecuting cases of illegal trade in waste and related offences in your country? If Yes, please outline

- Yes
  
- No
- Unknown

Q3: Do you know of any awareness raising campaigns in your country on the dangers of e-waste, targeted for the public and/or for enforcement agencies?

- Yes, please provide examples / web-links etc.
  
- No
- Unknown

Q4: How would you characterize the co-operation between various law enforcement agencies (e.g. police, customs and environmental inspection agencies) in your country to counter the illicit trade in e-waste and related offences?

Q5: Does any regional / national organised crime threat assessment identify environmental crime or specific aspects of environmental crime such as e-waste as an increasing priority?

Q6: Are there any best practices to counter illicit activities involving e-waste that you wish to underline?

### **Any further issues**

*This section of the questionnaire provides an opportunity to make comments on any aspect that has not been covered by previous questions.*

Q1: Please provide any additional information you may deem important in relation to the illegal trade in e-waste.

Q2: Would you like a member of the CWIT Consortium to contact you about obtaining more information on this subject?

- Yes
- No

Q3: Would you like to receive updates, newsletters and publications from the CWIT Project?

- Yes
- No

**Thank you very much for completing this questionnaire**

**Please save and return to your INTERPOL National Central Bureau and request it be forwarded to the  
INTERPOL General Secretariat:**

**[environmentalcrime@interpol.int](mailto:environmentalcrime@interpol.int)**