

Financial Crime Risks in the Plastic Waste Trade

Overview of illegality in the plastic waste trade

The global plastic waste trade has become a conduit for financial crime, with criminals and organised crime groups exploiting regulatory loopholes to engage in fraud, bribery and money laundering under the guise of recycling.

Many high-income countries export plastic waste to lower-income nations, citing high domestic processing costs driven by underinvestment in waste management infrastructure. However, weak enforcement capacity in both exporting and recipient countries enables systemic fraud, including misdeclaration of waste, document forgery and abuse of recycling credit schemes. Brokers and intermediaries deliberately obscure supply chains, facilitating tax evasion, bribery and large-scale waste trafficking.

As a result, millions of tonnes of plastic waste are illegally exported and mismanaged each year, contributing to environmental destruction, public health crises and human rights abuses.^{5,6,7,8}

Despite international governance such as the Basel Convention, which regulates the transboundary movement of plastics waste, corruption and weak oversight allow criminal networks to operate with impunity. Fuelled by the exponential growth of plastics waste generated, authorities predict a corresponding growth of sophisticated illegal waste trading practices, with criminals exploiting financial institutions to launder illicit proceeds. 10

As INTERPOL highlighted in 2022, pollution crimes — especially those involving organised crime groups — are often tied to document fraud, tax evasion and money laundering. Corruption remains a key enabler, allowing the manipulation of waste shipment records to facilitate illicit trade.

While much of the global plastic waste trade is legitimate, distinguishing lawful transactions from criminal abuse presents a significant challenge for financial institutions. Illicit actors often mimic legal trade flows and the lack of reliable supporting data makes detection difficult.

This briefing outlines key risk indicators, red flags and financial typologies to help institutions enhance due diligence, strengthen transaction monitoring and identify suspicious activity.

By recognising these warning signs, financial entities can better assess potential risks and take appropriate action, including filing reports to national investigative agencies.

The plastic waste trade chain

The trade in plastics waste is complex and made up of many interconnected systems, individuals and processes. It can be summarised through the following eight steps:¹³

- 1. waste generation
- 2. collection
- sorting in source country
- 4. domestic reprocessing

- 5. export from source country (if not domestically reprocessed)
- 6. transboundary shipments (including transhipments)
- 7. import to destination country
- 8. reprocessing in destination country.

Illegal activity commonly occurs at:

- step 4: Fraudulent domestic recycling claims
- steps 5 to 7: Export fraud, misdeclaration of waste types or shipments, corruption and false authorisations and documentation
- throughout: financial crime schemes such as money laundering, trade-based money laundering, use of shell companies and bribery.

Key financial crime risks

The financial crime risks of the plastic waste trade can be categorised into three main areas: fraud, money laundering and bribery/corruption.

Fraud in the plastic waste trade

Fraud is one of the most widespread financial crimes in this trade, with schemes designed to generate illicit profits while evading environmental regulations. Common fraud types include:

- recycling credit fraud
 - companies falsely claim credits for waste never recycled
 - fraudulent issuance of recycling credits that can be traded in a market to satisfy domestic legislation (see Case Study: UK PRN/PERN Fraud, below)
 - under-reporting actual waste volumes to reduce financial obligations
- misdeclaration and document fraud
 - exporters falsely classify contaminated or mixed waste as 'high-quality' recyclable material to bypass controls
 - waste shipments misdeclared as raw plastic material to evade tariffs and regulations
 - double-counting recycling credits across multiple jurisdictions (carousel fraud)
- fake recycling facilities & fraudulent brokers
 - shell companies registered as recycling businesses with no operational capacity
 - fraudulent brokers 'sell' waste for processing but divert it for illegal dumping or incineration.

Money laundering in the plastic waste trade

Criminal networks potentially use the plastic waste trade for trade-based money laundering, exploiting the complexity of transnational supply chains. According to the UN Office on Drugs and Crime, the methods below are common in waste trafficking cases, including cases identified in South-East Asia and the EU:14,15,16

- over- and under-invoicing of waste shipments
 - criminals inflate or deflate invoice values to move illicit funds between jurisdictions
 - waste shipments serve as a front for shifting money between shell companies
- use of shell companies & third-party payments

- payments routed through intermediary companies to obscure illicit fund flows
- waste brokers with no physical presence act as conduits for moving money internationally
- integration with other illicit markets
 - waste trading used to launder proceeds from drug trafficking, human trafficking and corruption
 - criminals funnel illicit proceeds into the plastics waste supply chain to create the appearance of legitimate income.

Bribery and corruption in the plastic waste trade

Bribery and corruption can enable illegal waste shipments by manipulating enforcement agencies and regulatory processes:

- bribery of customs officials and regulators¹⁷
 - illegal payments to municipal officials to award waste contracts to certain companies
 - payments made to customs officials to allow illegal waste shipments
 - fraudulent permits granted in exchange for bribes to facilitate hazardous waste exports
- corrupt licensing and fraudulent accreditation
 - waste processing facilities bribing regulators to obtain licenses despite lacking capacity
 - fraudulent accreditation of facilities that do not meet regulatory standards
- political corruption and regulatory capture
 - politically exposed persons involved in waste management firms in countries with a poor record of treating waste in an environmentally sound manner 18
 - waste trading companies lobbying for weaker environmental controls to facilitate illicit profits.

Key actors in the trade

The plastic waste trade involves multiple actors, some of whom exploit regulatory gaps for financial crime. Below are the key players and the risks they can pose.

1. Brokers and intermediaries

- · Act as middlemen, often obscuring financial flows and disguising ownership
- misdeclare waste shipments or sell fraudulent recycling credits
- high use of offshore entities and shell companies raises money laundering risks.

2. Waste management and recycling companies

- Some companies falsely claim to recycle waste, issuing fake plastic recycling credits
- · lack of audits allows for fraudulent waste declarations and illegal exports
- front companies are sometimes used by organised crime groups to launder illicit proceeds.

3. Exporters and importers

- Mislabel shipments to bypass restrictions or claim financial incentives
- bribe customs officials to allow illicit shipments through

· waste may be dumped illegally or processed at unlicensed facilities.

4. Companies failing due diligence

• many waste exporters, processors and brokers do not conduct proper due diligence on their business partners or waste shipments. This creates opportunities for fraud, illegal waste trafficking, and money laundering to flourish unchecked.

5. Common due diligence failures include:

- exporters and brokers fail to verify recipient facilities or conduct proper compliance checks
- directors/shareholders may have past involvement in fraudulent schemes
- companies operating in high-risk countries without clear licensing or regulatory compliance pose financial crime risks

Geographic risk areas in the plastic waste trade

Global trade shifts and emerging high-risk jurisdictions

For decades, China was the dominant global importer of plastics waste, receiving the majority of waste exports from high-income countries. However, in 2017 the country's National Sword policy effectively banned plastic waste imports, citing severe environmental and public health concerns.¹⁹

This policy shift disrupted global trade flows, leading to a redirection of plastic waste exports to other jurisdictions, many of which have weaker enforcement mechanisms and high corruption risks.

These new trade routes have created opportunities for criminal actors to exploit regulatory gaps, engage in fraud and facilitate illicit financial flows.

High-risk jurisdictions in the plastic waste trade

These new trade routes have created opportunities for criminal actors to exploit regulatory gaps, engage in fraud and facilitate illicit financial flows.

- 1. source jurisdictions high-income countries that generate and export plastics waste
- 2. transit jurisdictions trade hubs or stopover locations where shipments may be re-routed, re-labelled or manipulated to obscure their true origin and contents
- 3. destination jurisdictions countries that import and process plastic waste, often with limited infrastructure or capacity to manage large volumes of imported waste, increasing the risks of under-resourced enforcement agencies, illegal dumping, bribery and environmental crime.

Below are some of the most notable export, transit and import jurisdictions.^{20,21}

* Source countries	Transit countries	Destination countries
Germany Japan United Kingdom (UK) Netherlands United States (US) Belgium France Italy Canada Austria	The Netherlands Belgium United Arab Emirates (UAE) (UAE) Malaysia Hong Kong	Türkiye Netherlands Vietnam Indonesia Malaysia Thailand India Pakistan Bangladesh Poland Romania Czech Republic

High-risk fraud schemes: plastic recycling credit scams

Plastics recycling credit schemes are intended to incentivise responsible waste management and shift responsibility to waste generators, but criminals and complicit businesses have exploited these systems for fraudulent financial gain.

These schemes are highly vulnerable to fraud due to self-reporting mechanisms, poor oversight and regulatory blind spots.²²

Global trade shifts and emerging high-risk jurisdictions

Many countries operate plastic recycling credit systems whereby companies responsible for generating plastic waste purchase credits to fulfil their legal obligations. These schemes include:

- **UK PRN/PERN System** companies buy Packaging Recovery Notes (PRNs) or Packaging Export Recovery Notes (PERNs) from accredited recyclers.
- **Extended Producer Responsibility (EPR) Schemes** companies must prove they recycle a certain amount of waste, often using tradeable credits to meet targets.

In theory, these credits ensure proper recycling and waste management, but in practice fraud is rampant.

Common fraud methods

Criminals exploit weaknesses in recycling credit systems in several ways:

- issuing fake credits fraudsters sell credits representing recycled plastic for waste that was never processed
- **double-counting credits** the same plastic is fraudulently counted multiple times across jurisdictions (carousel fraud)
- **misdeclaring material** companies issue credits for waste that does not meet recycling requirements, for example, contaminated waste or non-packaging plastics
- false export claims waste never reaches its declared destination, but credits are still issued
- **shell companies and money laundering** fraudulent recyclers use shell companies to launder money through fake credit sales.

Case Study: UK PRN/PERN Fraud

Global trade shifts and emerging high-risk jurisdictions

The UK operates a system called the PRN and PERN, designed to ensure that companies generating large volumes of plastics waste contribute financially to recycling efforts. Obligated companies (those handling more than 50 tonnes of plastic packaging per year and with a turnover exceeding £2 million) must purchase PRNs/PERNs or prove that they are recycling the required amount of plastic waste.

Criminal networks and complicit waste companies have exploited weaknesses in this system, issuing fraudulent PRNs for waste that was never recycled or misdeclaring waste to claim illegitimate credits. Fraudulent activity in the PRN market is widespread, with estimates suggesting that in 2023 alone, between £30 million and £50 million (10-15 per cent of the total PRN market) was lost to fraud.²³

Fraud methods identified:

- **fake PRNs/PERNs for non-existent waste** criminal groups and complicit recyclers sell PRNs for waste that was never processed
- **mislabelling waste materials** brokers falsely declare low-value materials (such as contaminated plastics) as higher-grade recyclable plastic to claim credits

• **double counting** – the same plastic waste is fraudulently counted twice, either within the UK or across jurisdictions.

Case examples

Brokerage mislabelling low-quality waste

• an undercover investigator approached a UK-based waste brokerage, which offered to mislabel low-quality plastic regrind from refuse bins as plastic crates to illegally qualify for PRNs. The broker further suggested moving the waste to another site to make the claim appear more credible.²⁴

Fraudulent PRNs on mixed waste

Industry insiders reported that shipments labelled as PET bottles (which qualify for PRNs) were frequently stuffed with PET reels (which do not) and PRNs were fraudulently claimed on the full tonnage.²⁵

Organised crime group running fake waste operations

• an OCG set up multiple fake waste companies, obtaining waste processing licenses and brokering plastic shipments. In reality, the group never processed the waste — instead, it was illegally dumped or falsely labelled as bioplastic for recycling. The same OCG later pivoted to a crypto-based energy business, laundering proceeds from waste fraud.²⁶

Financial crime risks and red flags for banks

- sudden spikes in PRN/PERN transactions without corresponding physical waste movements
- newly registered waste brokers with unclear company structures receiving large payments
- high-risk trade routes the top 10 destinations for illegal UK plastic waste include Türkiye, Malaysia, Netherlands, Pakistan and Thailand
- unusual payment structures money moving through multiple accounts or offshore entities linked to waste brokers.

Case Study 2: India's EPR fraud

How the fraud works

India's Extended Producer Responsibility (EPR) scheme is designed to ensure that Indian companies which generate plastic waste are required to ensure its proper collection and recycling. Instead of handling waste directly, companies can fulfil this legal obligation by purchasing EPR credits from accredited recycling facilities.

However, major loopholes in regulation, weak enforcement and corruption have turned this credit system into a major financial crime risk.

Investigations have uncovered systemic fraud, non-compliance and collusion between waste processors and regulators, allowing companies to falsely claim recycling credits without actually processing waste.

Fraud methods identified

- fake EPR credits recyclers issue credits for plastic waste that was never processed
- **recycling facilities operating on paper only** some facilities issue credits before they are even operational
- **misdeclaration of waste types** companies import non-recyclable plastic waste under false documentation, making it appear eligible for EPR credits.

Case examples

Duplicate EPR credit number on multiple imports

An Indian company imported plastic film rolls from Germany and the US, but investigations found that both shipments used the same EPR credit number on their paperwork — an indicator of potential fraud.²⁷

Fake recycling facility issuing credits before operations began

A waste management company in India was found to have issued 350,000 tonnes of EPR credits before the facility was even operational. Regulatory officials were complicit, granting approval despite the plant lacking basic infrastructure.²⁸

Misdeclared waste shipments via UAE

A Dutch company attempted to ship plastic film rolls to India, falsely declared as plastic packaging, via an intermediary in the UAE. Upon inspection, the shipment was revealed to be non-recyclable plastic waste disguised as eligible material.²⁹

Financial crime risks and red flags for banks

- · companies issuing high volumes of EPR credits before their facilities are operational
- duplicate credit numbers appearing in multiple transactions
- payments to newly established waste brokers operating out of high-risk jurisdictions
- trade routes involving intermediary transit countries (e.g., UAE used to disguise the true origin of waste).

Risk indicators for transaction monitoring teams

Financial institutions play a critical role in detecting suspicious financial activity linked to the plastic waste trade. Due to gaps in regulatory enforcement and opaque supply chains, criminals exploit financial services to facilitate fraud, money laundering and corruption within this sector.

The following risk indicators can help transaction monitoring teams identify potentially illicit transactions and escalate them for further review.

Key risk indicators for transaction monitoring

Risk Category	Indicators of Suspicious Activity	
Licensing and regulatory red flags	 ▲ Company or directors linked to revoked/suspended licenses (e.g., PRN/PERN or EPR accreditations). ▲ Company lacks proper licensing but continues processing high-value transactions. ▲ Frequent changes in business name or registration details, particularly among waste brokers or exporters. ▲ Sudden changes in business activity, such as a retail or construction company shifting to waste trading. 	
Fraud and trade-based money laundering indicators	 ▲ Discrepancies in trade documents (e.g., mismatch between declared materials and invoice details). ▲ Repeated use of the same PRN/PERN/EPR credit number across multiple transactions. ▲ Payments from companies not authorised to process waste or issue recycling credits. ▲ Inflated or unusually low-value invoices for waste shipments, suggesting over-/under-invoicing. Unusual payment structures, including: multiple intermediary accounts moving funds payments routed through unrelated third-party countries transactions structured to avoid reporting thresholds. 	
Intermediaries, shell companies and ownership obfuscation	 Frequent use of intermediaries, particularly offshore brokers and transit jurisdictions. Opaque ownership structures, including shell companies with little or no reported waste processing activity. Frequent transactions between companies with shared directors or linked shareholders. Closed-loop transactions, where funds cycle between affiliated parties across multiple jurisdictions. 	
Bribery and corruption risks	 Payments to government officials or politically exposed persons linked to waste processing approvals. Large or irregular cash transactions, particularly in high-risk jurisdictions. Payments routed through countries with weak anti-corruption frameworks (e.g., known for customs bribery). Companies registered in transit hubs (e.g., UAE, Belgium) but with no actual processing operations. 	
Geographic risk flags	 Transactions involving high-risk jurisdictions, including: major waste-exporting countries (e.g., UK, Germany, US, Japan) known transit hubs (e.g., UAE, Belgium, Netherlands) high-risk waste-importing destinations (e.g., Malaysia, Indonesia, Pakistan, Türkiye). Maste shipments routed through multiple jurisdictions before reaching their final destination. Payments linked to jurisdictions with recent reports of illegal dumping, corruption or plastic waste-related fraud. 	

Strengthening transaction monitoring

- cross-check clients with environmental agency records to identify revoked licenses
- conduct adverse media screening on companies, directors and shareholders to identify links to fraud, regulatory breaches, and financial crime
- enhance scrutiny of cross-border transactions involving jurisdictions frequently linked to illicit waste trade.

Relationship manager aide-mémoire

Key questions to assess risk when onboarding a waste management company or exporter:

1. Does the business story make sense?

- has the company been operating long before obtaining a crediting accreditation?
- · do the owners or key principals have a relevant background in plastic waste processing?
- is there a mismatch between its stated operations and workforce size or economic activity?

2. Are licenses and accreditations in place?

- is the company's EPR/PRN accreditation valid and up to date?
- for UK companies, is their Environment Agency accreditation current?
- have any directors/shareholders been linked to companies with revoked accreditations?
- for exporters: Can they verify the accreditation of overseas processing facilities? Have any of the facilities been named in corruption-related allegations in the media or available court records?

3. What is the standard of internal compliance?

- does the company audit its issuance of EPR/PRN credits to prevent fraud?
- for exporters, what checks are in place to confirm waste is processed legally at its destination?
- does the company use brokers or intermediaries, and if so, are they vetted?
- how does the company verify the legitimacy of its third-party partners?

Strengthening due diligence in the waste trade

After completing the aide-mémoire checklist, financial institutions should take additional proactive steps to mitigate financial crime risks in the waste trade:

- conduct Enhanced Due Diligence on high-risk waste companies, especially those with large transaction volumes, opaque ownership structures, or weak compliance measures
- use adverse media screening to identify red flags such as past fraud, revoked licenses or directors/shareholders linked to regulatory violations
- verify licensing and accreditation documentation, particularly for exporters working with overseas processing facilities in high-risk jurisdictions.

By incorporating these measures, financial institutions can identify risks earlier, prevent financial crime exposure and ensure compliance with AML regulations.

* Low and middle-income countries are also involved in exports. However, the focus here is upon high-income countries, which export the vast majority of plastics waste.

The Environment Agency publishes its register of accredited reprocessors and exporters online. Information is archived by year. A search for a company in the 2025 register will tell you whether the company is accredited now. If you want to check whether a company's accreditation was suspended or cancelled in a previous year, you have to search the register for the relevant year. Environment Agency, Public Register of Accredited Reprocessors and Exporters, Available here: https://npwd.environment-agency.gov.uk/PublicRegister.aspx

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predominantly

- 15. Corruption of local officials was a common theme in Operation Poubelle, a successful EUROPOL-supported operation focusing on the organized illicit trafficking of waste from France to Spain. See here: https://www.basel.int/Implementation/LegalMatters/lllegalTraffic/Meetings/ENFORCE9/tabid/10127/Default.aspx for a copy of the presentation.
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