environmental investigation agency

Ocean

Dirty Deals - Part Two

Evidencing illegalities in the global plastic waste trade

November 2024

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SVENSKA POSTKODLOTTERIETS STIFTELSE

ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduces the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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Front cover:
A growing mountain of plastic and other waste in a landfill, a stark symbol of the unchecked global waste trade crisis, with millions of tonnes accumulating annually, polluting the environment and burdening local communities.
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Above:
Recycled plastic flakes — without clear labelling and tracking, these materials often contain hidden toxins, underscoring the urgent need for transparency to ensure safety in products made from recycled material.
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Executive summary

The global plastic waste trade is an environmental disaster hiding in plain sight, fuelling organised crime, working conditions that amount to human rights violations and devastation to human health and the environment.

The Environmental Investigation Agency's (EIA's) second instalment of our two-part *Dirty Deals* report pulls back the curtain on a system where misdeclared plastic waste, murky supply chains and shadowy brokers thrive, enabling millions of tonnes of waste to be dumped in countries unequipped to handle such huge volumes.

Despite the Basel Convention, which regulates the transboundary movement of hazardous and other wastes, including plastic waste, these illicit operations exploit loopholes and weak enforcement, creating a facade of 'recycling' while wreaking havoc on the local communities on which the Global North dumps its waste.

Unscrupulous traders in Europe are using fake documents, complex transshipment routes and weak enforcement to flood places such as Türkiye with plastic waste.

Our review of freedom of information (FOI) requests for Dutch illegal shipments of plastic waste revealed that 41 per cent of shipments were misdeclared, 56 per cent lacked proper notification or failed to receive consent from the importing country, and 67 per cent involved intermediaries, reflecting ongoing trends.

From the UK to Türkiye, EIA's investigation uncovered the disturbing reality: that companies such as Rushden-based recycler Monoworld would ship plastic waste to facilities that are unable to manage it. Türkiye's plastics recycling sector is riddled with worker exploitation, including child labour and dangerous conditions for refugees.[1] Brokers weave a tangled web of deceit, using fake documentation and transshipment routes to dodge accountability.

This report is a call to action. EIA demands a total ban on plastic waste exports from the UK, ambitious inclusion of the transboundary movement of plastic waste in the international legally binding instrument on plastic pollution (the Global Plastics Treaty), mandatory corporate due diligence and cutting-edge digital tracking systems to stop these crimes in their tracks.

The plastic waste crisis is spiralling beyond control – the time to act is now.

Above: Vast volumes of plastic waste are shipped across borders, often times going unchecked before passage, allowing illegal trade to slip through regulatory checks and evade enforcement.


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Introduction

Companies in the Global North are reaping significant profits by exporting their plastic waste to other countries, fuelling a growing industry worth tens of billions of dollars.[2]

EIA's latest investigation reveals that some of these companies are complicit in corrupt practices, including bribery and human rights violations.

Facilitating this illicit trade is a shadowy network of international brokers who employ sophisticated methods to evade law enforcement and control authorities. The global plastic waste trade operates without transparency or accountability, exploiting regulatory loopholes, legal frameworks and weak enforcement – and generating big profits at the expense of people and the planet.

In this second instalment of our two-part *Dirty Deals* investigation, we reveal how legal and illegal plastic waste trade pathways drive environmental harm, human rights abuses and organised crime.

While precise volumes of plastic waste are difficult to determine due to widespread misdeclaration, concealment, a lack of transparency and opaque supply chains, it is estimated that hundreds of thousands of tonnes of plastic waste are trafficked annually, right under the noses of authorities who are ill-equipped to stop it.[3]

This situation is further exacerbated by political choices to not prioritise prevention, exemplified by the recent cuts to funding for the UK's Environment Agency (EA), hindering its ability to effectively regulate and combat illegal waste trade.[4]

Expanding on the findings from *Dirty Deals – Part One*, which exposed fraud within the UK and India's extended producer responsibility (EPR) schemes for plastic recycling and the urgent need for domestic reform, this second part delves into the mechanisms that allow plastic waste to be exported with little assurance it is destined for environmentally sound management (ESM),[5] exposing the manipulation of trade routes, misdeclared shipments and the central role of intermediaries and brokers beyond borders.

Our investigation reveals how strategic mislabelling, falsified documentation and complex transshipment networks obscure the true origins and destinations of plastic waste, creating a facade of legitimacy.

Countries in the Global North play a significant role in this issue, with Europe, the US, Japan and Australia accounting for the majority of plastic waste exports to

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countries which are not members of the Organisation for Economic Co-operation and Development (OECD) and to other OECD countries such as Türkiye and Poland.[6]

Despite international agreements and domestic legislation in place to regulate plastic waste trade and ensure proper end-of-life treatment, plastic waste continues to flow from the Global North to the Global South, often under false pretences in violation of the law. This practice, known as 'waste colonialism', perpetuates cycles of environmental injustice and places an undue burden on communities least equipped to manage the harmful impacts.

While the investigation focuses on the illegal and unethical trade of plastic waste, it is essential to recognise that tackling this issue requires more than stricter enforcement and adequate waste trade policy. A reduction in virgin plastic production is necessary to decrease the overall generation of plastic waste and relieve pressure on global waste management systems.

Stricter controls on plastic waste trade and increased transparency are also urgently needed, but long-term solutions must focus on reducing the production of plastics globally. Without addressing overproduction, efforts to combat waste trade and improve waste management systems will be undermined by the sheer volume of waste generated, which continues to exponentially increase.[7]

The opportunity to secure ambitious production reductions is within reach in the negotiations for the UN Global Plastics Treaty, but it is at a pivotal moment ahead of the final round of negotiations in Busan, Korea this November.[8] Setting limits on plastic production is widely recognised as essential to tackling plastic pollution at its source and ensuring sustainable production and consumption, as agreed upon by countries in the UN Environment Assembly (UNEA) Resolution 5/14.[9] Reports have also highlighted the urgent need to reduce plastic production to meet the 1.5°C climate target.[10]

Despite significant cross-regional support for control measures on primary plastic polymers, political complexities and limited negotiating time threaten their inclusion in the final treaty.[11] However, country support has kept these discussions moving forward and this is a critical moment to push for binding global measures that will ensure a meaningful reduction in plastic production, addressing both environmental and climate impacts.

Our investigation shines light on the opaque nature of this trade, where high profit margins incentivise exportation and attract criminal involvement, which is becoming increasingly sophisticated. The sheer scale of the trade and complexity of enforcement makes plastic waste trade fertile ground for illegal activities.

We uncover specific instances where waste was shipped without consent, recipient details were falsified and shipments were routed through transshipment networks that obscure their origins. Transshipment refers to the practice of transferring goods from one mode of transport to another, or from one ship to another, while en route to their final destination.[12] Brokers and intermediaries play a critical role in these deceptive practices, adding layers of complexity that hinder enforcement.

By exposing these illegal pathways, we highlight the urgent need for stricter controls, greater transparency and stronger international collaboration to combat the deep-rooted harmful impacts of the global plastic waste trade.

Only through these efforts can we dismantle the networks profiting from this illicit trade and move toward a future where plastic waste is managed equitably.

Opposite page: Mismanaged waste often comes from countries offloading their plastic burden onto vulnerable communities, perpetuating environmental and social injustice. Improper disposal methods like open burning release harmful toxins and have detrimental impacts on human health and the environment in affected regions.

Above: Rivers serve as major conduits of plastic pollution, transporting plastic waste to the oceans. Mismanaged waste from open dumping can flow directly into waterways, harming ecosystems both locally and far downstream.

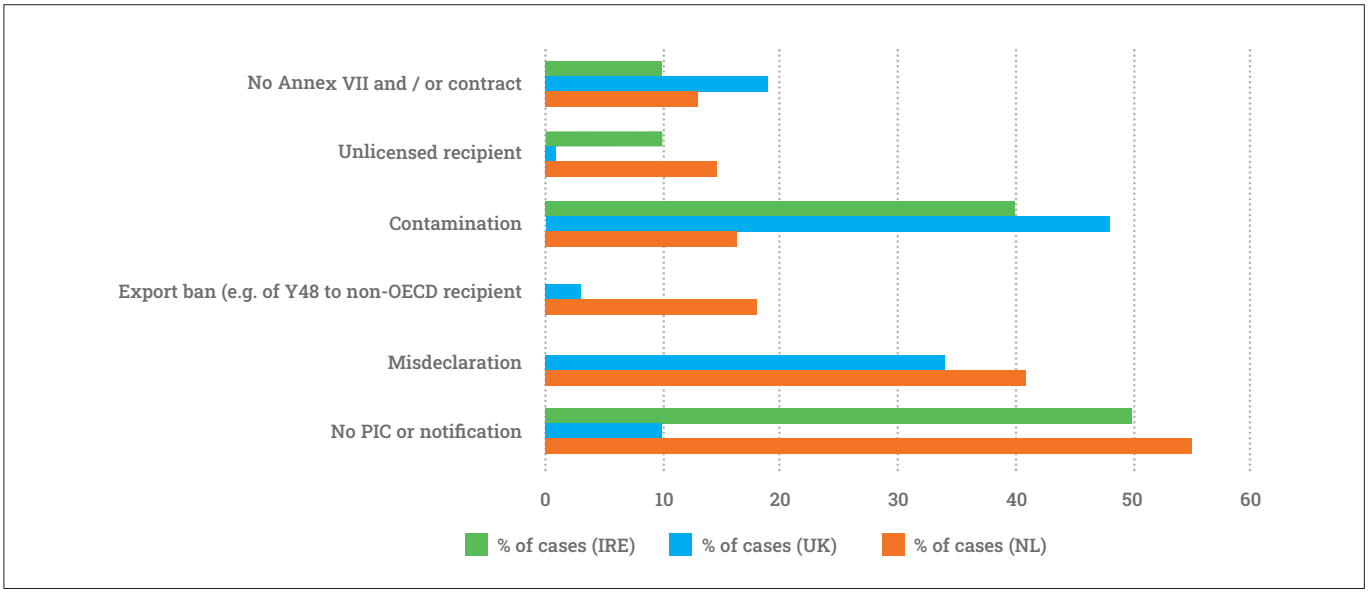
Misdeclarations and non-compliance in plastic waste trade

Each year, significant amounts of legal and illegal plastic waste move across international borders. The Basel Convention establishes a legally binding framework that creates conditions which determine how plastic waste can occur.[13]

Under the Convention, the trade of plastic waste should only take place if:

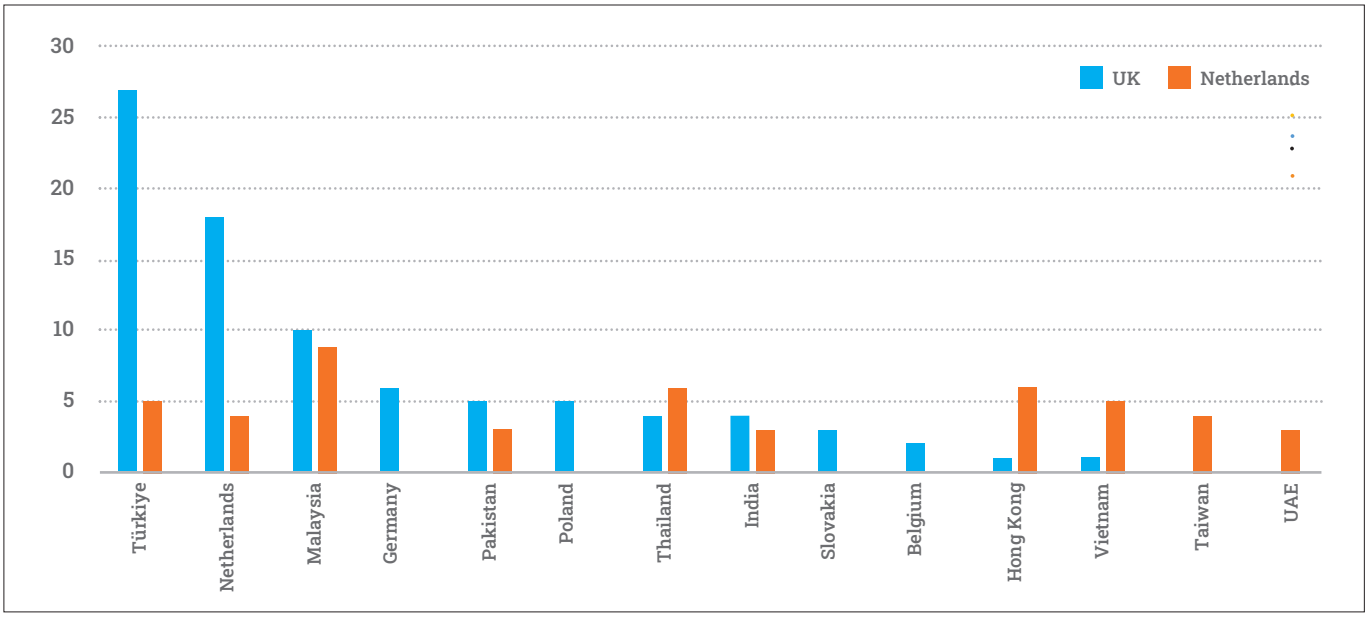
1. the exporting country lacks the technical capacity, necessary facilities or appropriate disposal sites to manage the waste in an environmentally sound manner
2. the plastic waste is needed as raw material for recycling or recovery industries in the importing country
3. the movement complies with other criteria agreed upon by the parties, provided these align with the objectives of the convention.[14]

Figure 1: *Reasons for illegal plastic waste shipments.*



Source: Data received in response to Freedom of Information requests to the Environment Agency (UK), ILT (the Netherlands) and Dublin City Council (IRL).

Figure 2: *Top destinations for illegal shipments.*



Source: Data received in response to Freedom of Information requests to the Environment Agency (UK) and ILT (the Netherlands).

Our investigation found that criminals use a range of various deceptive practices to exploit weaknesses in plastic waste trade regulations and illegally traffic waste across borders. These tactics include misdeclaring and mislabelling waste, using false or incomplete records and concealing contaminated waste in shipments.

As a result, shipments easily evade the necessary environmental checks to ensure the waste is destined for environmentally sound management (ESM) and for contaminated and hazardous waste, without the requisite prior informed consent (PIC). This leads to non-compliance, mismanagement and damage to communities in the importing country and the environment.

For example, we found more than 60 cases brought between 2018-23 in which where the Human Environment and Transport Inspectorate of the Netherlands (ILT) found that plastic waste management companies deliberately used these tactics to evade regulations from the Netherlands alone.

While plastic waste trade is often framed as part of a legitimate recycling system, the reality is there is overwhelming evidence that waste ends up mismanaged, improperly disposed of or displacing locally generated plastic waste from being recycled. This systemic exploitation perpetuates the ongoing illegal flow of plastic waste, often to countries without the capacity for recycling.

1. Misdeclaration of waste

Misdeclaration is a core tactic used to misrepresent the true nature of the waste being exported, allowing traders to bypass legal and regulatory controls. This includes not only misclassifying waste but also concealing contaminated or other waste or by falsely declaring the destination or nature of the shipment.

The international trade of waste, including plastic, is regulated by Harmonised System (HS) codes, a standardised classification system used primarily for customs and trade purposes.[15] However, these codes lack specificity regarding the contamination or hazardous nature of plastic waste. The Basel Convention's Plastic Waste Amendments now require all plastic waste crossing borders – whether clean or contaminated – to also be classified under the relevant Basel codes.

In practice, HS and Basel codes should be used together for proper documentation accompanying plastic waste shipments. While HS codes offer a general trade classification – commonly HS 3915 for plastic waste, parings and scrap – the Basel code provides more granular details on waste characteristics, including its composition and contamination levels.

Below: Plastic waste mixed with household waste, intercepted en route to another country by the EA—an example of misdeclaration tactics used to evade regulations, perpetuating illegal waste trade and burdening importing nations with hazardous waste.

The Basel Convention distinguishes three types of plastic waste through the codes B3011, A3210 and Y48: B3011 for clean, sorted and recyclable plastic, A3210 for hazardous plastic waste and Y48 for all other difficult-to-recycle or contaminated plastic.[16] Each code carries specific legal obligations.

Criminal networks and unscrupulous traders exploit this dual code system by deliberately misdeclaring and then mislabelling and concealing waste. This involves falsifying documents by using incorrect HS or Basel codes to obscure the waste constituents or misrepresent its origin.

Such practices can involve concealing other types of waste in plastic waste shipments, hiding hazardous or contaminated plastic within uncontaminated easier to recycle plastic to evade stricter regulations and offshore waste or hiding plastic in other waste materials like paper.

Examples of misdeclaration:

- **non-recyclable waste concealed as recyclable:** Traders may mix uncontaminated recyclable plastic with non-recyclable or contaminated materials. By declaring the shipment as fully recyclable, they avoid stricter regulations meant for hazardous or non-recyclable waste
- **misrepresentation of composition:** Underreporting or omitting the presence of hazardous chemical additives such as phthalates or heavy metals. These additives can classify the waste as hazardous, but by misdeclaring traders bypass tighter controls
- **concealment of other waste types in plastic:** In some cases, electronic waste, industrial waste or even municipal solid waste is declared as plastic. Since plastic may face fewer export restrictions or enforcement attention, this tactic enables the illegal movement of hazardous materials
- **concealment of plastic materials within other waste types:** Plastic waste is sometimes concealed within paper bales, making detection by authorities difficult as superficial inspections may not reveal hidden contaminants. Furthermore, some plastic waste which should be listed as HS 3915 is misdeclared as other HS codes.

Misdeclaration enables traders to evade the stricter controls imposed by the Basel Convention and other international frameworks, leading to the illegal cross-border movement of waste. A review of Dutch ILT data revealed that 25 out of 61 cases (41 per cent) involved deliberate misdeclaration of waste in the shipment

Below: Plastic regrind from packaging, flagged by enforcement during visual inspections before export—underscoring the crucial role of these checks in preventing mismanagement and ensuring waste is what it purports to be.

documentation, where incorrect HS codes or missing Basel codes allowed hazardous waste to bypass customs checks. Inconsistent application of the rules across borders, insufficient resources for inspections and the complexity of international logistics systems mean that not all plastic waste trade adheres to all the regulatory frameworks.

Furthermore, misdeclaration leaves the onus on enforcement authorities to catch the misdeclared waste. Even state-of-the-art ports with scanners have difficulty in assessing whether the plastic is what it purports to be. Visual inspections are the primary method used by enforcement authorities, which limits their ability to distinguish between different types of plastics and waste concealed through deceptive practices such as frontloading containers, mislabelling and layering materials.[17] Visual checks make it difficult to distinguish between similar-looking plastics or to detect hidden waste.

Contamination in plastic waste

Contamination plays a central role in distinguishing how plastic waste should be classified. Concealment allows traders to obscure the true nature of waste and bypass stricter environmental regulations for contaminated waste. When the waste is contaminated — either with hazardous substances, non-recyclable materials or other types of waste — its proper classification would subject it to more rigorous controls, including PIC procedure under the Basel Convention (see next section for more on PIC). However, by misdeclaring the waste as uncontaminated or recyclable, traders exploit regulatory loopholes and enable the illegal shipment of waste across borders without consent.

Contamination in plastic waste can occur in several forms:

- **chemical contamination:** The presence of harmful additives such as phthalates, heavy metals or flame retardants, which turn plastic waste into a hazardous category.[18]
- **organic contamination:** Residues from food, medical waste or other biodegradable materials mixed with the plastic, making it unsuitable for recycling but falsely declared as clean plastic
- **physical contamination:** The inclusion of non-plastic materials, such as paper, metal or glass, mixed with the plastic bales, which complicates the recycling process and results in the entire load being effectively non-recyclable.

Properly declared contaminated plastic waste would require verification that the receiving country has infrastructure for ESM of hazardous or difficult to recycle materials, which many plastic waste importers lack. Traders therefore misdeclare contaminated shipments as clean, classifying them under the B3011 code to avoid regulatory penalties or shipment rejection.

Extract from notes by EA inspector on a UK shipment to the Netherlands in March 2021.

"Load listed on annex vii as Plastic Recyclate. Load was predominantly PP Pots and Trays with some HDPE bottles and LDPE film. On initial visible inspection the load appeared to have a relatively high level of contamination; there was also a discernible organic type smell coming from the load. Upon closer examination, a dirty face mask could be seen in the lower right bale. A nappy and dirty face mask could also be seen on the upper left bale. All these items were on the outside of the bales and were clearly visible. There was also food packaging present which was clearly signed not for recycling. Some of the packaging also contained remnants of the original fillings/foods and I suspect this was where the organic smell was emanating from. Load not almost free from contamination or other waste types. The level of contamination from other waste types was greater than would be expected for a load to be exported as Green List. PP Plastic builder bags contaminated." [19]

Exporter's notification	The exporter or the exporting country must notify the competent authorities of the importing country and any transit countries about the intended shipment. This notification includes detailed information about the waste, its origin, route and the intended disposal or recycling process.
Importer's consent	The importing country and any transit countries review the notification and either consent, conditionally consent or deny the shipment. They may impose specific conditions to ensure that the handling, recycling, or disposal of the waste is environmentally sound.
Movement documentation	Proper documentation is required throughout the shipment process, including the waste movement document, which must accompany the shipment to ensure transparency and traceability.
Proper enforcement	Both the exporting and importing countries have responsibilities to enforce the PIC procedure. Importer countries should ensure they not only receive consent, but that the waste is what it purports to be. The importing country should not only consent to the shipment but also confirm its receipt and proper disposal. Both countries authorities must ensure that illegal traffic of plastic waste is prevented and that violations are penalised.

2. Non-compliance with PIC procedure or trade prohibitions

Hazardous, contaminated or difficult-to-recycle plastic waste shipment (Basel A3210 or Y48) has stricter control measures to help ensure such materials are destined for ESM, thus minimising harm.

First, the Basel Convention's Ban Amendment prohibits the export of hazardous plastic waste – A3210 – from members of the OECD, Liechtenstein and the EU to other states.[20] The second safeguard is the Basel Convention's PIC procedure, a regulatory mechanism aimed to ensure prior consent of the importing and transit countries.[21] The PIC procedure requires:[22]

The procedure is designed to minimise the harmful impact of plastic waste trade, particularly contaminated waste, by ensuring that the waste is managed in an environmentally sound manner and that countries have the capacity to handle the waste they receive.

While the PIC procedure is a crucial tool, 34 out of 61 of the ILT cases (56 per cent) involved exporters failing to obtain PIC or properly notifying the importing country. Traders exploit regulatory inconsistencies and insufficient enforcement capacity across borders to circumvent these crucial procedures.

Non-compliance with PIC with regards to European exports

The 2024 revision of the European Union (EU) Waste Shipment Regulation (WSR) introduces stricter controls on the export plastic waste, in response to growing concerns about the environmental and human health impacts of waste shipments such as pollution, toxic emissions and mismanagement of plastic waste in recipient countries.[23]

Mismanagement is the largest source of pollution and, once in the environment, plastic pollution can fragment into smaller pieces of plastic, such as microplastics. Studies have detected microplastics in humans, in our blood, brains, stomachs, lungs, placentas, penile tissue, livers, kidneys, knee and elbow joints and bone marrow.[24] Studies also show that more than 1,500 species in marine and terrestrial environments are known to ingest plastics.[25] Further, poor waste management practices are linked to toxic emissions and the further pollution of air, soil and water.[26]

The new provisions strengthen the 2021 ban on Y48 and A3210 plastic waste exports to non-OECD countries, with a complete ban on all plastic waste exports to these countries starting in 2026. There is also increased scrutiny of exports to OECD countries, with mechanisms to suspend shipments if ESM standards are not met. Additionally, the regulation enhances reporting requirements, mandating the use of an electronic exchange platform for waste shipment data and imposes stricter contamination thresholds (two per cent) for B3011 plastic waste exports. Importantly, the EU now requires PIC procedure for all plastic waste exports, regardless of their composition.

Previously, B3011 plastic waste traded between the EU, UK and European Free Trade Association (EFTA) countries or exported to OECD countries only required an Annex VII form.[27] This form tracked the transboundary movement of "green-listed" plastic waste – waste that is clean, sorted and easy to recycle – to ensure proper ESM, without requiring formal consent from the importing country's authorities.

Unlike hazardous, contaminated and difficult to recycle plastic waste, under Basel B3011 does not require PIC from the importing or transit countries.[28] Thus, the Annex VII form served as a simplified control mechanism, detailing the waste's composition, origin and intended recovery process without requiring prior consent.

Criminals have exploited the Annex VII forms by falsely declaring hazardous, contaminated or difficult to recycle waste as green-listed using an Annex VII form, bypassing the need PIC. This allowed for the illegal movement of hazardous waste disguised as easier-to-recycle waste. Although the EU now mandates PIC for all plastic waste exports, this method of misdeclaration remains relevant in the UK, where the Annex VII system is still used, making the UK vulnerable to continued abuse of these simplified forms post-Brexit.

Conclusion on misdeclarations and non-compliance

The misdeclaration of contaminated plastic waste and non-compliance of PIC procedure has significant human health, environmental and economic consequence including harm to the environment, through mismanagement that can lead to air, water and soil pollution.[29]

The costs for receiving countries dealing with contaminated waste increases the burden on already-stretched waste management systems. It also undermines legitimate recycling markets as the contaminated materials reduce the quality of recyclate and create inefficiencies in recycling processes in addition to increasing risk of mismanagement, through dumping in the open environment and burning.

Overall, contamination is not only a byproduct of mismanaged plastic waste, but a deliberate tool used in misdeclaration to evade legal and environmental responsibilities. Efforts to combat this issue require stricter enforcement, better monitoring systems and enhanced international cooperation to ensure the correct classification and responsible handling of plastic waste globally.

Below: Shipping containers stacked at Felixstowe port, where the EA relies on intelligence-led inspections to flag containers for scrutiny—leaving many shipments unchecked and highlighting the challenges in curbing illegal waste exports.

A lack of traceability

At the heart of the global plastic waste trade is a critical lack of transparency, obscuring the volume and types of waste involved and, as such, underestimates the scale of its environmental and social impacts, which is well-documented.

Inadequate paper-based reporting, no centralised database or global monitoring system, weak regulatory oversight compounded by the widespread use of brokers and intermediaries create a murky supply chain. The complexity makes it nearly impossible to accurately track the nature of the amount of waste traded, where waste ends up or how it is processed.

This opacity not only leads to the mismanagement of plastic waste, which has devastating effects on the planet, but also hampers efforts to determine the ESM of plastic waste, with severe consequences for human health and the environment, even in cases where waste is reprocessed.

A study by the International Pollutants Elimination Network (IPEN) found that toxic chemicals, including brominated flame retardants and dioxins, were present in recycled plastic products such as children's toys and kitchen utensils.[30] These harmful substances, which originate from plastic waste streams, can contaminate the recyclate, posing serious risks to both human health and ecosystems.[31] These urgent ethical and health concerns demand immediate global action.

Middlemen of mismanagement: the role of brokers and intermediaries in the plastic waste trade

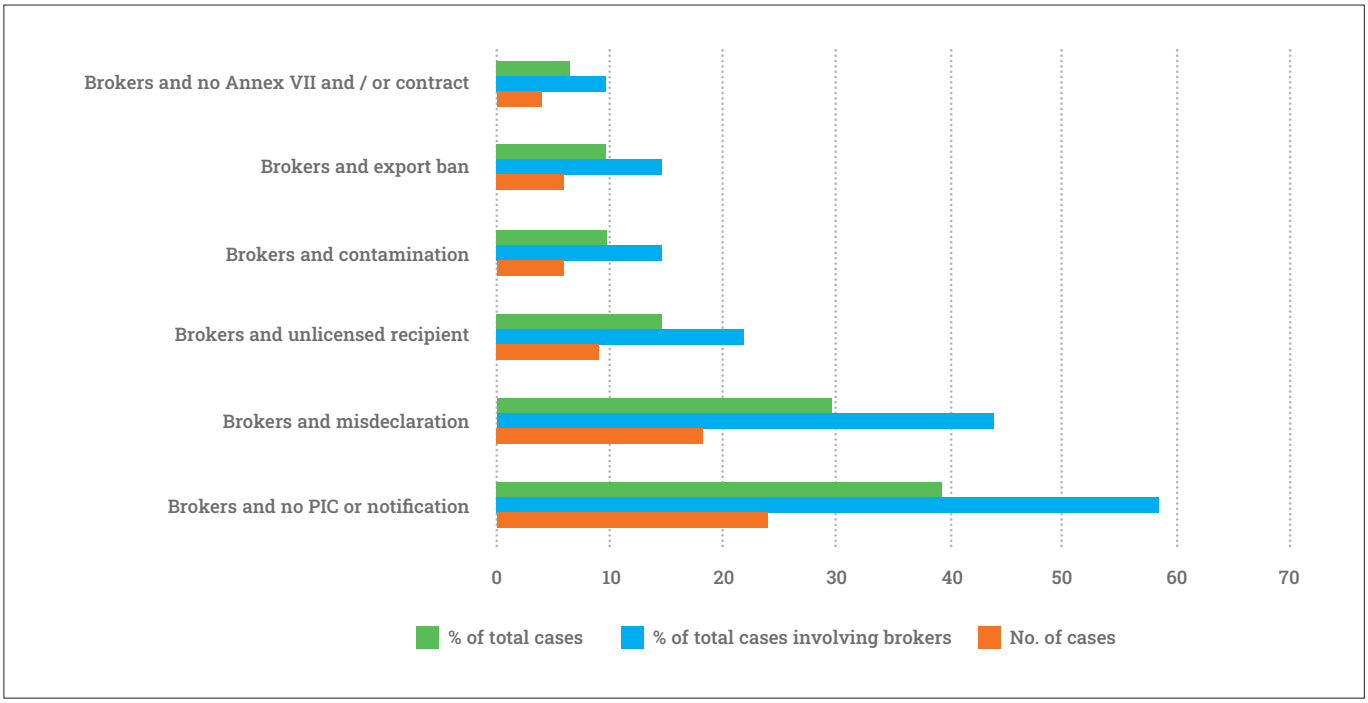
The global plastic waste trade is driven by brokers and intermediaries who profit by buying and selling plastic waste to processors. However, this profit comes at the expense of human health and the planet, exacerbating management challenges.

Problematic practices include the export of low-quality or non-recyclable waste, misdeclaring shipments and avoiding regulations. In our review of Dutch ILT data, 41 of the 61 cases (67 per cent) involved these middlemen. This pattern is not isolated; these intermediaries were linked to misdeclaration in 40 per cent of cases and non-compliance with PIC procedures in 30 per cent of cases.

A tangled web of intermediaries: the case of polyethylene terephthalate (PET) shipments from Europe to India

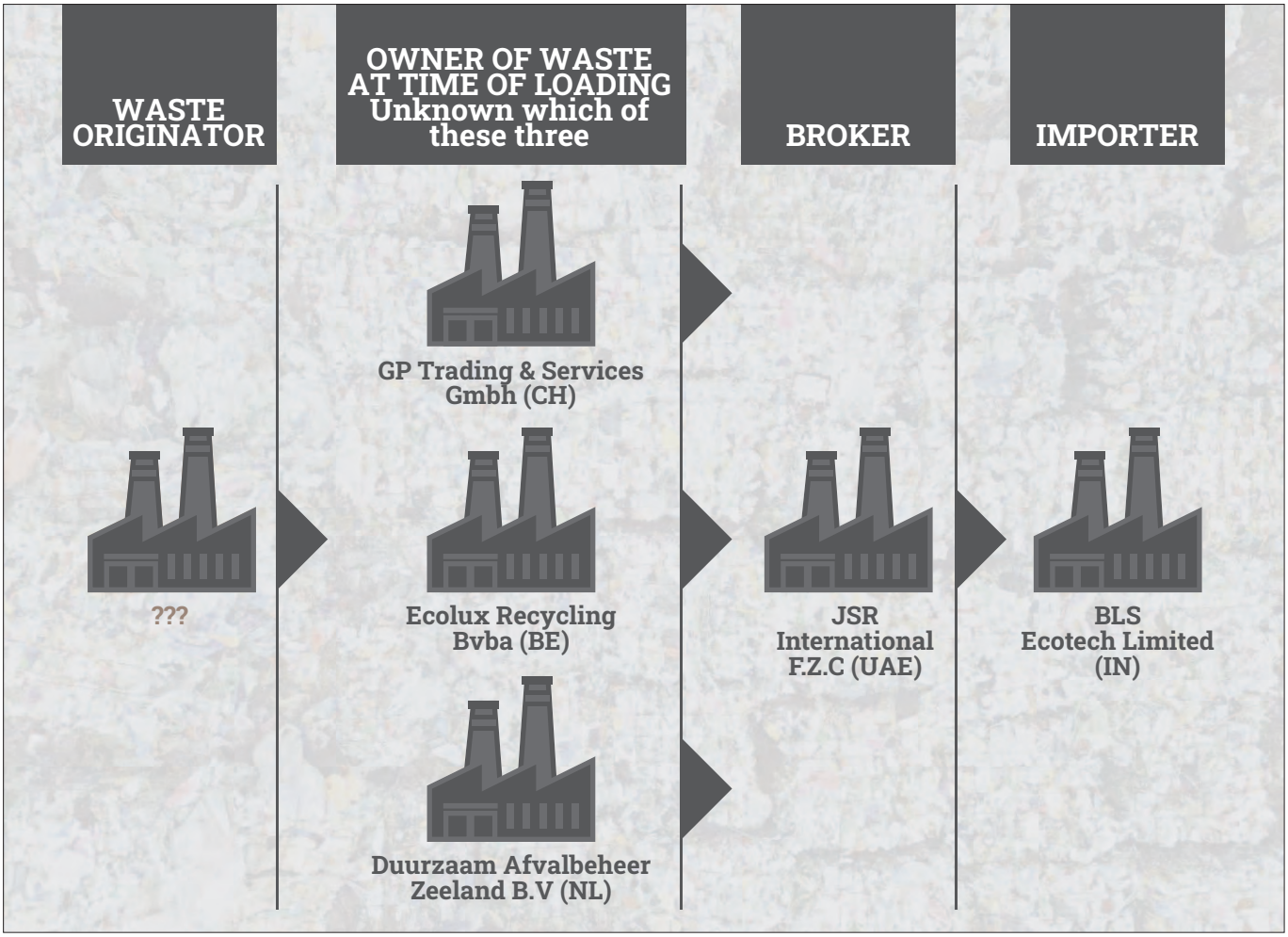
A case from our Dutch FOI request to ILT that involved the illegal shipment of PET lumps, a by-product from the production of PET, from the Netherlands to India

Figure 3: *Breakdown of cases involving brokers.*



Source: FOI data

Figure 4: *Companies involved in an investigation by ILT as authorities worked to trace the origin of an illegal shipment of PET lumps, highlighting the complexity of tracking plastic waste in global trade.*



Source: FOI data

via Belgium in 2022 illustrates the challenges in holding parties accountable when intermediaries are involved. Dutch investigators deemed the shipment to be illegal because the exporter had not sought PIC from Indian authorities and had failed to provide any evidence to prove its origins or that the material was not waste.

The shipment's Annex VII form listed JSR International F.Z.C., a United Arab Emirates (UAE) based broker, as the arranger, BLS Ecotech Ltd (India) as a recycling facility importer and Duurzaam Afvalbeheer Zeeland B.V. (DAZ) (Netherlands), a waste collector and reprocessor specialising in industrial waste, as the waste generator. However, the Dutch investigation revealed two additional intermediaries not mentioned in the official documentation.

DAZ claimed the waste belonged to another intermediary, GP Trading & Services GmbH (Switzerland), which allegedly assured DAZ the material was not waste. However, when questioned by the Dutch authorities, GP Trading denied ownership, pointing instead to a third trader, Ecolux Recycling Bvba (Belgium). Ecolux also denied ownership.

The convoluted trail made it impossible to establish clear ownership or responsibility, highlighting the challenges faced by regulators in tracing illegal waste shipments.

The Dutch investigation into the PET shipment uncovered several contradictions in DAZ's claims that the material was not waste. The documents, which include a poorly completed Annex VII form, described the shipment as waste. GP Trading also attempted to explain the discrepancies by stating that the Annex VII form had been mistakenly filled out and no contracts or invoices were available to support the shipment. Neither GP Trading nor DAZ provided evidence to clarify the shipment's origin or prove it wasn't waste, illustrating a lack of transparency and accountability.

Ecolux Recycling is linked to Yulin Wang, a Belgium-based Chinese businessman whose companies have been involved in several illegal waste trade activities in other jurisdictions.

His UK-based company, 3R Technology Ltd, was issued Enforcement Notices relating to breaches of the Transfrontier Shipment of Waste Regulations in

November 2020 and June 2022.[32] Furthermore, a fire at a recycling plant owned by Ecolux Recycling SEE DOO, a Serbian company which was at least 49 per cent beneficially owned by Wang, broke out on the same day as local authorities had found irregularities and illegalities in the operations of the company.[33]

This case highlights the complex network of entities and jurisdictions involved in waste shipments, demonstrating how brokers can even obscure the involvement of certain entities to avoid regulatory scrutiny or increased inspections for problematic companies, thereby complicating efforts to enforce regulations and prevent illegal waste trade.

Veiled voyages: the murky path of waste through transshipment

Transshipments – where waste passes through multiple countries and brokers before reaching its final destination – are a common practice in the illegal plastic waste trade.[34]

These shipments often take convoluted routes, using various ports and carriers to obscure the true origin, the shipper, the consignee and the final destination. During transit, documents such as the bill of lading and movement documentation may be altered or reissued, further complicating efforts by customs authorities to trace the initial exporter and the final importer.[35]

This practice is frequently used to evade risk profiling and searches by enforcement authorities.

The complex network of illegal plastic waste transshipments in Europe

Between 2019-23, 61 plastic waste enforcement cases were handled by the Dutch ILT. Of these, 31 (51 per cent) likely included transshipments, characterised by multiple countries, ports and transport methods in each trade chain. Brokers played a role in all but two of these cases.[36]

The Netherlands has emerged as a key transshipment hub for plastic waste exports, including those from the UK, particularly after China's plastic waste import ban and other countries' domestic regulations have shifted trade routes, with the Netherlands increasingly exporting plastic waste.[37]

According to United Nations (UN) Comtrade data, the UK's plastic waste exports to the Netherlands doubled between 2019-23, from 59,000 tonnes in 2019 to 116,000 tonnes in 2023.[38]

In the same period, Dutch exports of plastic waste to Latin America, Asia and Africa also surged, positioning the Netherlands as a key intermediary in the global waste trade.[39]

These trends show that although the Netherlands has a high capacity to handle plastic waste, the plastic waste entering it is not intended for domestic processing but instead is transshipped to other countries, taking advantage of the Netherlands' logistical infrastructure to obscure the waste's true origin and destination.[40] This complicates tracking and regulatory oversight as it blurs the lines of accountability and facilitates the movement of waste through less scrutinised channels.

Transshipments between the UK and Netherlands raise significant concerns, exemplified by three cases EIA uncovered via FOI requests dating from April 2018, October 2019 and September 2021. In April 2018, DTS Trading Ltd, a waste trading company in Solihull, UK, attempted to send a shipment to an Indonesian reprocessor via the Netherlands. The shipment, intercepted by the ILT, involved Cumbria Waste Group

Above: Fire at Ecolux Serbia plant that occurred on the same day as local authorities had found irregularities and illegalities in the operations of the company. Fires have suspiciously coincided with enforcement actions, raising questions about intentional acts to cover up illegal activities.

and O'Brien Waste, a subsidiary of Biffa, and included a company incorporated in the Marshall Islands, a known secrecy haven, which added a layer of complexity to the investigation.

DTS Trading has faced multiple enforcement actions since 2018, including the cancellation of its plastic packaging export accreditation in 2023 for providing false information.[41] Additionally, its former director, Tianyong Wang, was prosecuted in 2022 for illegally exporting household waste misdeclared as plastic to Indonesia via Berry Polymer Ltd. Despite this, Wang continues to operate another company, Evergreen Polymers Ltd, while DTS Trading still operates under new management.[42] This systemic flaw in the UK system is highlighted in *Dirty Deals – Part One*.[43]

Further transshipments, identified in October 2019 and September 2021, involved UK shipments supposedly destined for treatment in the Netherlands but more likely intended for Poland, a common destination for problematic UK waste within the EU. References to Polish transport companies were included in the documentation in those cases.

UK Trade Data reveals that plastic waste exports from the UK to Poland surged from 37,000 tonnes in 2019 to 52,000 tonnes in 2021 before sharply dropping to 3,800 in 2023.[44] This decline is likely due to increased scrutiny by the UK's Joint Unit for Waste Crime, according to cases outlined in a June 2022 Interpol report.[45] While shipments to Poland have decreased by 90 per cent, exports to other Eastern European countries, such as Romania, have nearly doubled, reflecting a shift in destination points within the EU.[46]

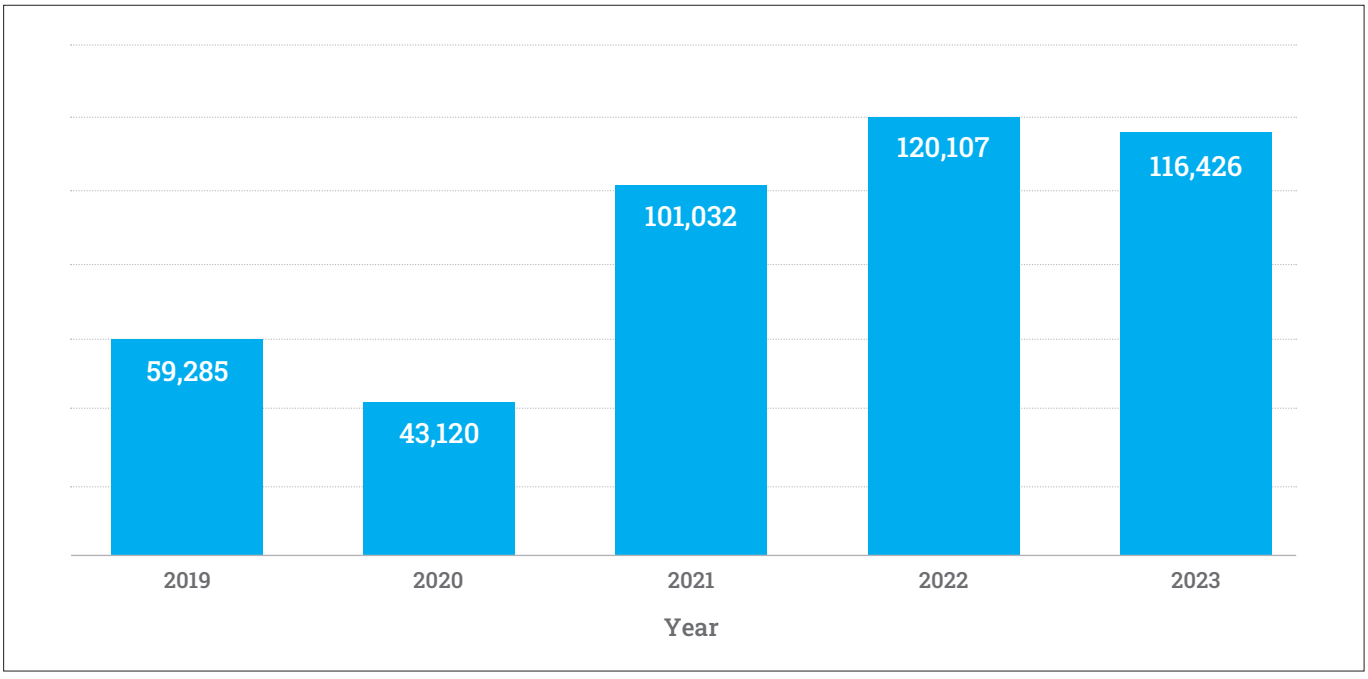
While it is unclear whether this increase in exports to countries such as Romania is fuelled primarily by illegal shipments, recent investigations have documented British waste being dumped there.[47]

Illegal waste trafficking is a growing concern across Europe, affecting both EU and non-EU countries. EU member states such as Bosnia and Herzegovina, Romania, Poland, the Czech Republic and Bulgaria have seen a significant rise in waste imports after China's 2017 plastic waste import ban and stricter EU regulations aimed at curbing waste colonialism, sources warn this could lead to more illegal traffic.[48] Poland is currently taking legal action against Germany over illegal waste shipments, illustrating the severity of the issue within the EU.[49]

Moreover, EIA's sources indicate that mixed urban waste is being trafficked into Spain from France, Italy and, possibly, the UK. Although this waste is declared as recyclable, it is reportedly landfilled due to lower landfill costs in Spain or, in some cases, re-exported to countries such as Türkiye or Vietnam. This is problematic as Spain faces significant challenges in tracking illegal waste trade, despite efforts to tighten control.[50]

Interpol flagged illegal landfilling and fires as an emerging trend after China's import ban and, in the same report, Spain reported an increase of fires by 100 per cent to eliminate accumulated waste.[51] Earlier this year, the European Commission acknowledged this issue, referring Spain to the Court of Justice for its failure to apply the waste management requirements, including failure to shut down 200 illegal waste sites.[52]

Figure 5: *UK Plastic Waste Exports to the Netherlands (tonnes).*



Source: UN Comtrade

Opaque networks: closed loop transactions involving affiliated parties around the globe

A growing concern in international plastic waste trade is the use of closed-loop transactions involving affiliated parties, which is when financial transactions occur within a group of connected companies, often through financial transfers between commonly owned entities across different countries.[53]

While such practices might appear legitimate, they introduce a significant degree of opacity into the supply chain, making it difficult for regulators to trace the final destination of plastic waste. This lack of transparency can facilitate financial crimes, such as money laundering, tax evasion and fraudulent financial reporting.

Closed-loop transactions not only obscure the financial trail but also enable companies to manipulate profits and conceal illegal activities, including the mismanagement of waste. By moving waste between affiliated entities, companies can misdeclare the type, volume or destination of plastic waste, bypassing regulatory oversight. This often results in plastic waste being improperly processed, leading to environmental degradation and public health risks, especially in countries in the Global South. In many cases, this waste ends up in landfills or is burnt, contributing to pollution and harming local communities.[54]

The complex web of cross-border transfers makes it challenging for regulators to trace the true path of waste, detect financial crimes and hold companies accountable. As waste moves through multiple jurisdictions, the lack of transparency and coordination among enforcement agencies further complicates investigations, enabling environmental harm and financial misconduct to go unchecked, posing significant challenges for law enforcement and regulators.

The UAE: an emerging gateway in the global plastic waste trade

EIA's investigation into illegal plastic waste shipments to India revealed that shipments coming from Europe and the US are often routed via intermediary companies based in free zones – areas with special regulations and financial incentives to attract foreign businesses – in the UAE.[55]

Our investigation revealed that many UAE-based intermediary companies are closely linked, often through shared ownership, to the Indian companies importing the waste. These closed-loop transactions further reduce transparency and hinder proper due diligence.

A concerning example from May 2022 shows, according to data obtained from ILT, an illegal shipment of plastic packaging and PET reels from A De Vries Jbzn BV in the Netherlands was routed through Four Seasons FZE, a UAE-registered firm, on its way to final destination at TP Polymer Private Ltd in India. Both Four Seasons and TP Polymer companies are closely linked through shared ownership and co-directors.[56]

While intermediaries may register in the UAE for legitimate business reasons, such as tax advantages or financial incentives, the inclusion of a third-party country — particularly one known for limited corporate transparency — between importing and exporting nations significantly complicates both traceability and accountability in the plastic waste trade.

This is particularly concerning when the intermediary country has low levels of traceability or corporate accountability.[57] The UAE's ambition to become a global recycling trade hub raises concerns that international efforts to mitigate the environmental harms of the plastic waste trade could be undermined.[58]

Conclusion on transparency

These urgent ethical and health concerns demand immediate global action to bring transparency to the plastic waste trade.

We need to go beyond the Basel Convention by understanding not just the movement of waste, but also the materials we produce and their downstream impacts. By shedding light on the full lifecycle of plastic products, we can eliminate opportunities for criminals to infiltrate the trade and ensure waste is managed responsibly.

This transparency is crucial for reducing harm to human health and the environment and for creating a sustainable future.

Left: Dutch authorities intercepted an illegal shipment of PET reel plastic waste misdeclared under a different HS Code. The shipment was en route to India, where the recipient lacked the necessary permit, and no consent was granted by Indian authorities.

A failure in due diligence

The export of plastic waste trade should require stringent due diligence from exporters to ensure that their waste will be managed in an environmentally sound manner. Yet even legally exported waste can become illegal if it is not processed under adequate environmental and social safeguards.

Even if there is a lack of requisite PIC procedure for B3011 plastic, the responsibility lies with exporters to ensure their recipient counterparts can handle the green-listed waste responsibly.

The Global North's overproduction and consumption of virgin plastics drive excessive plastic waste generation and fuel both legal and illegal plastic waste trade. Without rigorous oversight, even waste that can currently be legally exported can end up in facilities that violate basic environmental standards, harming local communities.

EIA's investigation revealed that Monoworld, one of the UK's largest recycling companies, did not thoroughly verify credentials before offering to send plastic waste to a non-existent facility lacking the infrastructure to manage it properly.

Monoworld: an investigation into due diligence in the UK's plastic waste trade

Monoworld, a leading UK waste management group based in Rushden, has emerged as one of the UK's top exporters of plastic waste to Türkiye, a market under increasing scrutiny for environmental and human rights violations.[59]

Monoworld shipped approximately 33,000 tonnes of plastic waste to Turkish facilities in the past five years alone.

Despite reporting substantial net profits — £4.6 million in 2022 and £3.67 million in 2023 — Monoworld's practices, including previous fines for illegal shipments, have raised serious concerns with regards to its exports to Turkish facilities. Monoworld and two of its directors were also prosecuted for multiple safety failings in October 2017, with the company receiving penalties of £90,000 and one of its directors receiving a 12-month suspended prison sentence after 15 enforcement notices over two years were ignored.[60]

Above: Open burning is an illegal practice under the Basel Convention, yet it remains common in regions handling mismanaged imported waste—releasing toxins and highlighting gaps in enforcement of responsible and environmentally sound waste treatment.

Our investigation revealed that Monoworld's due diligence process did not detect the fictional information we provided, which raises significant concerns about the potential for illegal waste exports. In one instance, Monoworld provided documentation to our undercover investigator without verifying the legitimacy of our operations, a practice that could facilitate illegal activities. Had they done so they would know we didn't exist

While Monoworld is one of the top 10 exporters to Türkiye, it was also fined more than £7,000 in 2004 for five illegal shipments to India and more than £23,000 in 2015 for illegal shipments to Germany and China, highlighting past compliance issues.[61]

EIA's undercover investigation found that Monoworld did not properly assess whether its Turkish buyer had the necessary infrastructure to process waste safely and it potentially overlooks the use of outdated equipment and hand-sorting techniques at these companies, as well as engaging in other suspicious export practices.

The consequential impacts of the huge quantities of plastic waste shipped to Türkiye have been documented extensively in recent years.[62] For example, improper burning of waste and fires at sites are common, while recycling plants themselves rely on hand-sorting and outdated methods of reprocessing that are harmful to human health.

Between 2021-22, Türkiye was the most common destination for UK plastic waste deemed illegal by the UK's Environment Agency, which regulates waste exports. Through FOI requests, EIA found that the EA discovered widespread misdeclaration of waste, with non-packaging plastics such as road furniture being shipped as packaging waste and contaminated materials mixed with clean bales. Such practices were common in Türkiye-bound shipments flagged by authorities (see fig 2).[63]

EIA, posing as a Turkish importer, deployed an undercover test in which Monoworld readily agreed to sell us various plastic waste, including LDPE film, HDPE drums, OPP film and polymethyl methacrylate (PMMA) bales with no concern about our ability to process these plastics responsibly. Although the company followed UK guidelines by requesting basic documentation, it failed to verify the authenticity of our credentials or assess whether we had the necessary facilities to manage difficult materials such as PMMA. Monoworld replied to this allegation stating that they "had not supplied any product to [our undercover company] nor made any orders with them or, for that matter, supplied any products to them."

According to UK Government guidelines, to export packaging waste and qualify for a Packaging Export Recovery Note (PERN) – which is issued when one tonne of plastic packaging waste is exported to be reprocessed overseas – waste exporters must typically provide evidence that the receiving facility will follow ESM standards. This evidence can include documentation such as a recent inspection report by the competent authority in the importing country, a valid operating licence and a statement of compliance with local environmental standards.[64]

However, this system is problematic in countries such as Türkiye. A Turkish plastic waste trade expert told us that many reprocessing facilities in Türkiye have reportedly violated environmental laws and that inspections by local authorities are often insufficient or inconsistent.

According to the expert, fines for environmental breaches are relatively small and may not act as a significant deterrent, with some companies treating them as part of their operating costs rather than as penalties for serious violations. This statement is further supported by a Human Rights Watch interview with anonymous recycling facility owners over fines for mismanagement in 2022.[65]

Monoworld appeared to follow UK Government guidelines by requesting evidence of our licensing credentials and production process before proceeding with the sale. We provided fictional information, including a video showing rudimentary HDPE flake processing equipment lifted from YouTube, and Monoworld failed to verify our legitimacy. A simple check would have revealed that our company did not in fact exist and that the equipment shown could not process PMMA. Nonetheless, Monoworld proceeded to the stage of sending a contract and their bank details, thus demonstrating a significant lapse in due diligence.

Monoworld responded that they "requested all [their] check documents which [they] are obliged to take [and they] have received all of [our undercover operation's] documents, together with their recycling production videos of recycling plants."

The preferred method for recycling PMMA involves depolymerisation as this process allows for the recovery of high-quality material. In contrast, simpler mechanical recycling found in the video, typically used for HDPE and LDPE, is less effective for PMMA due to potential degradation and loss of material properties.[66]

After agreeing to sell our front company the materials, Monoworld also informed us that they would substitute 20 per cent of the HDPE packaging drums we ordered with non-packaging HDPE road barriers as "back door material" due to a "logistics constraint" – such substitutions are commonly associated with practices that could enable inconsistencies in PERN reporting.[67] Our review of EA FOI data revealed at

least one instance in which an illegal UK shipment bound for Türkiye was found to contain unspecified road furniture misdescribed as packaging waste.[68]

As discussed in the misdeclaration section of this report, the practice of mixing compliant and non-compliant materials is common in the waste trade, often making it easier to misdeclare shipments and pass visual inspections by concealing non-compliant waste within compliant material. Monoworld provided our investigator a blank bill of lading instruction, leaving us to complete it ourselves — a practice that raises a red flag around concerns regarding potential misdeclaration of goods.

The bill of lading is usually filled out by the seller with details about the cargo, such as its quantity, description and destination.[69] The master or shipowner is responsible for verifying the information before shipment, thus allowing the buyer to fill out the material details of a blank bill of lading instruction could be misused to misrepresent or conceal the actual contents, quantity or nature of the cargo.

Since the seller is responsible for providing accurate information to the shipping line for the bill of lading, allowing the buyer to fill out a blank bill of lading instruction can open the door to misdeclaration. This practice could lead to tariff evasion, bypassing import restrictions or avoiding regulatory scrutiny around illegal waste shipments.

When asked about this practice, Monoworld said, "[w]e are obliged to provide a bill of lading instruction to the shipping line and in order to do this, on occasion we may send a blank form requesting details from our customers, which they can complete with the relevant details; [w]here this occurs, they will send that document to us in order that we can get the correct information and in order to finalise the paperwork to be sent on to the shipping lines for a bill of lading."

While this response may align with shipping procedures, these findings highlight the need for robust regulatory oversight and scrutiny in the plastic waste trade as allowing anyone outside the carrier and exporter to complete this document undermines the document's reliability.

In this instance, the company's failure to assess its Turkish counterparts' ability to handle waste safely highlights concerns regarding waste management practices and underscoring the need for regulatory oversight in high-risk markets like Türkiye.

The UK Government must ensure companies are held accountable and that stringent checks are enforced to prevent further harm. Transparency, accountability

Below: A truck loaded with plastic waste arrives at a Turkish recycling facility. Much of the UK's plastic waste ends up here, straining Türkiye's recycling systems and highlighting the urgent need for stronger UK domestic recycling solutions.

and strict oversight are needed to safeguard communities affected by the waste trade.

Monoworld also responded that they are a "responsible and environmentally conscious company specialising in recycling operations and significant investments made in UK recycling infrastructure and takes its responsibilities and obligations very seriously."

European companies risk bribery and corruption by exporting to politically connected firms

Our investigation found that UK plastic waste companies are likely failing to conduct adequate due diligence on their Turkish partners to verify they are not engaging with politically exposed persons (PEPs), increasing the risk of involvement in bribery and corruption.

The UK Bribery Act of 2010 contains criminal offences of bribery, including bribery of foreign public officials, and of failing to prevent bribery. To reduce the risks of bribery, UK businesses are expected to perform due diligence on counterparties, which includes background checks, risk assessments and ensuring compliance with anti-bribery policies. Ignoring these political red flags could place UK companies in violation of this law.[70]

Monoworld claims to uphold strict anti-bribery and corruption policies on its website, but our investigation shows it did not attempt to verify the ownership of its Turkish buyer.[71]

Monoworld has exported thousands of tonnes of plastic waste to Turkish firms with close ties to political actors, including Akbulut Plastik Geri Dönüşüm. In conversations with our undercover investigators posing as a Turkish company, Monoworld did not verify basic "know your customer" information, such as the ownership and directorship of the fake company.

Open source intelligence suggests that many Turkish plastic waste companies, including key partners of UK exporters, maintain strong political connections with President Recep Tayyip Erdoğan's ruling AK Party.

These political ties allow companies to influence legislation and evade scrutiny by regulatory authorities. For example, a brief ban on LDPE and HDPE waste imports in May 2021 was reversed after just seven days following industry lobbying. Additionally, the one per cent contamination rate allowance was diluted to favour the industry, replaced by a subjective 99 per cent recyclability measure.

At least one major Turkish recycling company is owned by a sitting parliamentarian, while many others have leadership with Türkiye's ruling AK Party affiliations or local council roles. Mustafa Akbulut, the chairman of Akbulut Plastik Geri Dönüşüm, a significant importer of European plastic waste, publicly promoted his candidacy for a municipal council seat in March 2024, despite an ultimately unsuccessful campaign.[72]

Similarly, the Tanriklulu Group's owner, commonly known as an "AK Party businessman," accompanied President Erdoğan on an official overseas visit in 2023.[73] Tanriklulu had previously secured a controversial municipal waste contract in 2019.[74]

European exports linked to child labour, refugee exploitation and hazardous conditions in recycling plants in Türkiye

We do not have evidence that Monoworld is linked to any Turkish facilities linked to issues outlined in this section; however, it is generally concerning that UK plastic waste companies continue to export to facilities with reported human rights violations, indicating potential due diligence gaps in addressing labour issues.

There has been evidence that Turkish recycling facilities often subject workers — many of them refugees and asylum-seekers from Syria and Afghanistan — to appalling working conditions, without safety measures, fair wages or compensation for workplace accidents.

In 2022, Human Rights Watch reported severe health impacts at Turkish recycling facilities, where toxic air pollutants from the recycling of plastic waste were harming workers, including children, as well as local residents in the surrounding communities.[75] Many of these facilities operate with minimal safety protocols and workers, especially refugee labourers, face constant exposure to hazardous chemicals.

Migrant workers are commonly employed under informal conditions, with no legal protections or compensation for injuries. They are forced to work in

dangerous environments, with reports suggesting their employers frequently exploit their vulnerable status.

Investigative journalist Adnan Khan revealed the tragic death of Arifullah Fazli, a young Afghan man working in a Turkish recycling facility who was tragically killed in a shredder due to unsafe working conditions.[76] According to other refugee workers, the facility owner tried to throw Fazli's body in the garbage to cover up his death.[77] This incident underscores the extreme risks faced by workers in the country's recycling industry, which is fuelled by significant amounts of UK and EU plastic waste.

In July 2022, two Turkish journalists were investigating the conditions at Akbulut Plastik Geri Dönüşüm and Akgül Plastik Geri Dönüşüm — facilities which are among the largest recipients of UK plastic waste — when they were assaulted by company officials.[78] After taking photographs of the facility, they were detained, beaten and threatened by managers, who reportedly boasted of their connections to the ruling AK Party. One of the journalists subsequently filed a police report against the company, but no action was taken.

One of the pair later stated: "One of the company officials we spoke to said that he saw the Syrian migrants who took refuge in [Türkiye] as cheap labour and admitted that they were employed unregistered and worked in poor conditions in recycling facilities. The official said that although this was a crime, the Government knew they employed migrants … If they are not committing crimes or employing workers in poor conditions, what are they hiding?"[79]

Despite these revelations and significant reporting on the story across Türkiye, our investigation shows that UK companies continue to send large quantities of plastic waste to these facilities. This continued trade raises significant concerns about the lack of due diligence by UK businesses and their role in perpetuating environmental and human rights abuses in Türkiye.

Insufficient enforcement capacity and challenges in verifying ESM compliance abroad

A major issue in regulating the UK plastic waste trade is the limited capacity of enforcement agencies, both domestically and abroad, to ensure ESM standards are met for exported waste.

The UK Environment Agency is tasked with inspecting waste shipments, but only manages to scrutinise a small fraction of them. Data analysis from 2017-22 suggests the EA inspected just one in 50 waste shipments under notification controls.[80]

This means that a large number of potentially illegal shipments, especially to countries such as Türkiye, are likely slipping through unnoticed.

Türkiye is the largest recipient of UK plastic waste and, given that estimates suggest a significant percentage of waste exports are illegal, it is reasonable to assume that many of these shipments evade detection.[81] With some UK companies already flagged for previous violations continuing to export to Türkiye and the complexity of tracking waste routes across borders, it is highly probable that illegal shipments are escaping scrutiny. The increasing reliance on fraudulent documents and misdeclarations in waste trafficking further supports the likelihood of widespread undetected illegal activity.

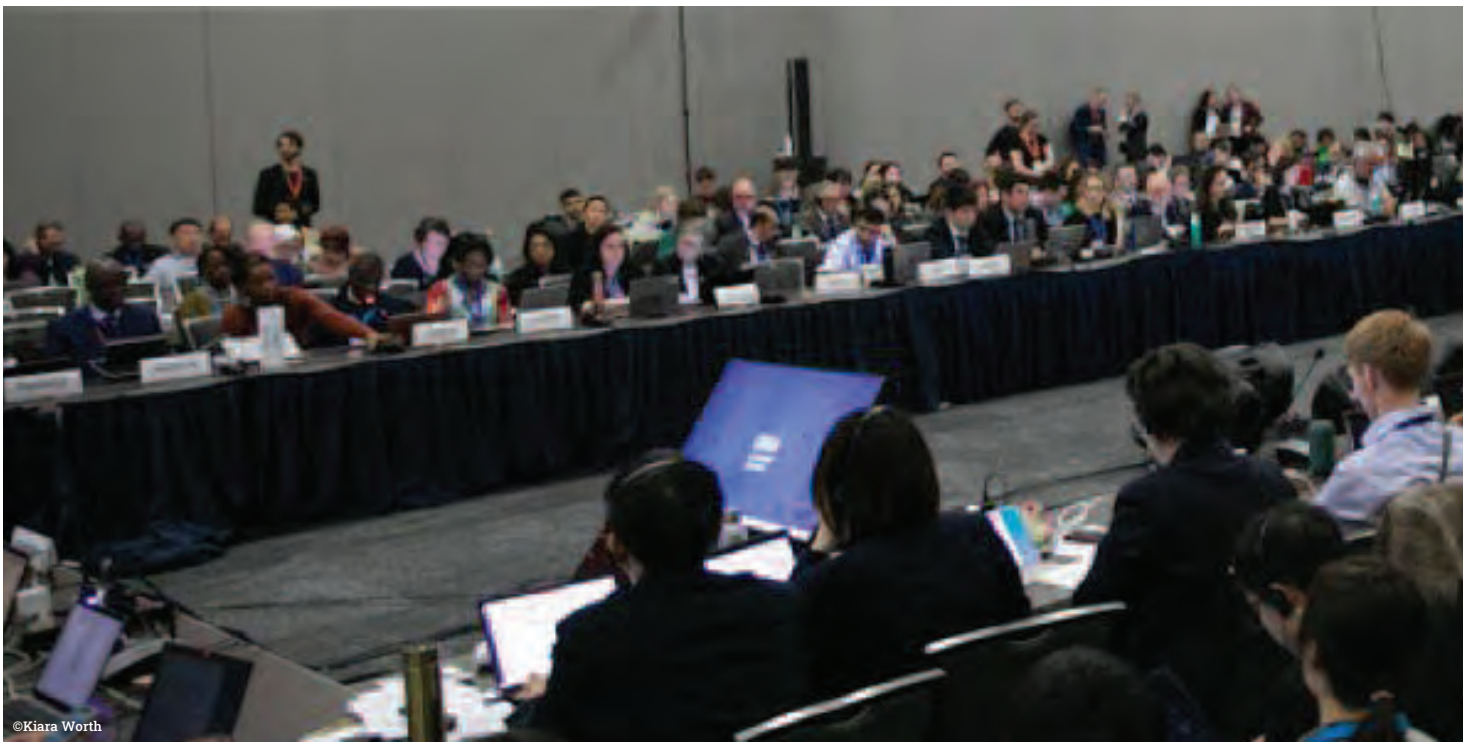
For example, DTS Trading Ltd, a UK company subject to four EA enforcement actions between 2018-22, exported more than 7,634 tonnes of plastic waste to Türkiye in just 2021-22.[82] This raises concerns about the effectiveness of current inspection mechanisms in preventing illegal waste trade.

A UK industry source familiar with waste trade practices informed EIA that larger companies are only caught for illegal exports due to "clumsy" errors. The source claimed that larger companies have become increasingly sophisticated in evading detection, particularly in committing PERN fraud. Some companies have automated systems which create fake evidence of fake source materials and operations staff may be unaware of the fraud happening when they handle bookings.

The source further warned that with significant profits at stake, it is common for certain businesses to devise systems difficult for the EA to detect, something the Agency notes as a difficulty in stopping the crime.[83] Moreover, the EA's limited capacity, which the source claims includes inexperience in waste trade, makes it easy for veteran industry players to deceive inspectors. Within the industry, those aware of illegal activities rarely report them, as the recycling sector is tightly interlinked, with most companies working together making it difficult for whistleblowers.

The issue is compounded by the lack of enforcement capacity in key destination countries for UK waste. Turkish plastics experts have highlighted that Türkiye lacks sufficient customs officials and environmental experts to adequately monitor plastic waste imports.[84] This means that even when importers claim their waste is exported legally and handled according to ESM standards, there is little to no assurance it will be properly managed once it reaches its destination. Therefore, such waste should not be shipped in the first place.

Opposite page: Investigations into UK plastic waste exports to Türkiye reveal that plastic waste, like this pile seen in Burdur, often ends up mismanaged—burned in open pits or buried—causing serious harm.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Conclusion and recommendations

The global plastic waste trade thrives on the exploitation of regulatory gaps, weak enforcement and a lack of transparency.

This investigation exposes the deeply embedded systems of misdeclaration, non-compliance and insufficient traceability which fuel illegal activities and environmental damage.

Current measures, while necessary, are insufficient to address the complexity and scale of the issue. Without a significant reduction in virgin plastic production and stronger international cooperation, the sheer volume of waste will continue to overwhelm waste management systems worldwide.

To combat this issue, we must implement stricter controls on plastic waste trade, enhance traceability mechanisms and build capacity for enforcement at both the national and international levels.

The involvement of intermediaries and the use of transshipment routes further complicate regulatory oversight, underscoring the need for digital tracking systems that allow for real-time monitoring across borders.

Above: Negotiators are working toward a global agreement to end plastic pollution. Countries are urged to consider complementary obligations to strengthen international cooperation, close loopholes and crack down on illegal plastic waste trade.

EIA suggests the following policy recommendations:

1. Include transboundary movement of plastic waste in the Global Plastics Treaty: While the Basel Convention has made significant strides in regulating plastic waste trade, its scope is limited when it comes to addressing upstream solutions, such as hazardous polymers and additives and creating enforceable rules to limit the pollution and health risks associated with plastic waste management.

The Global Plastics Treaty presents a critical opportunity to tackle the entire lifecycle of plastics. It is essential the Treaty does not exclude plastic waste trade, but rather complements and strengthens the Basel Convention's role. A comprehensive and robust transparency framework under the Global Plastics Treaty could mandate full disclosure of the composition and movement of plastic waste and recycled materials. Countries such as the UK and the EU should demonstrate leadership by advocating for ambitious, binding provisions which close regulatory loopholes and ensure the responsible global management of plastic waste.

2. Ban plastic waste exports: The UK should implement an immediate ban on all plastic waste exports, including to OECD countries. EIA's reports join

mounting evidence underscoring how even OECD countries such as Türkiye are grappling with the impacts of UK plastic waste, including environmental violations and worker exploitation. Ending exports would stop waste colonialism and drive the UK to handle its waste domestically to stop its harmful impact overseas..

3. Reduce virgin plastic production globally: Reducing the production of virgin plastics is essential to addressing the root cause of the plastic waste crisis. Limiting single-use plastics, banning problematic and unnecessary products and shifting to sustainable product design is not just a national challenge but a global imperative. The overproduction of plastics is overwhelming waste management systems worldwide, particularly in regions that lack the capacity to handle the growing volume of waste.

Phasing down virgin plastic production would relieve pressure on these systems, prevent pollution and contribute to achieving climate targets by cutting emissions associated with plastic production. The time to act is now — global leaders must commit to ambitious, binding targets to phase out virgin plastic production and transition towards a non-toxic circular economy that prioritises reuse, recycling and sustainable materials.

4. Establish mandatory due diligence and corporate accountability standards: Governments should mandate rigorous due diligence requirements for companies involved in the plastic waste trade. These requirements should include thorough assessments of the environmental and social practices of receiving facilities, verification of compliance with international labour standards and anti-bribery and corruption checks.

Companies should be required to publicly disclose their supply chains and the measures they have taken to ensure their waste is managed in an environmentally sound and socially responsible manner. Penalties for non-compliance should be significant enough to serve as a deterrent, including hefty fines and the revocation of export licenses for repeat offenders.

5. Develop and implement digital tracking and monitoring systems: To address the lack of transparency and traceability in the plastic waste trade, a unified global digital tracking system should be developed and managed collaboratively by the Basel Convention Secretariat and the forthcoming ILBI. Such systems should be designed to track the movement of waste from its point of origin to its final processing or disposal destination in real-time.

This would include digital documentation of all relevant shipping records, photographs of shipments at various stages and geolocation data to ensure waste is not illegally diverted. By making this data accessible to regulatory authorities across borders, it would facilitate better oversight, quicker identification of illegal activities and more effective enforcement actions against non-compliant entities.

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