

SBC e-waste Africa Project, Component 4

***National Training Workshop on e-Waste Egypt
Alexandria, October 10-12, 2011***



Report by

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and
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List of Abbreviations

BCCC	Basel Convention Coordination Centre [Nigeria]
BCRC Egypt	Basel Convention Regional Centre Egypt
ECA	Egypt Customs Authority
EEAA	Egyptian Environmental Affairs Agency [<u>Focal Point for the Basel Convention</u>]
EEE	Electronic and Electrical Equipment
ECO-FEI	Federation of Egyptian Industries – Environmental Compliance Office (and Sustainable Development)
IMPEL	European Network for the Implementation and Enforcement of Environmental Law
SBC	Secretariat for the Basel Convention
UEEE	Used Electronic and Electrical Equipment
WCO	World Customs Organization



Summary

The fourth African national training workshop of the SBC e-waste Africa Project (Component 4) was held on 10-12 October in Alexandria, Egypt. The workshop was organised by the BCRC Egypt and the Egypt Environmental Affairs Agency (EEAA) with input from Egypt Customs Agency (ECA), IMPEL-TFS, the SBC and the BCCC Nigeria.

The workshop was chaired by *Professor Mostafa Kamel*, Director of BCRC Egypt and *Mr. Ahmed El Sayaad*, Undersecretary of the Egypt Customs Authority (ECA), Alexandria. Co-chair on Day 1 of the workshop was *Dr Adel Osman Elshaffei*, General Director of the Hazardous Chemicals & Waste Department, Egypt Environmental Affairs Agency (EEAA) / National Focal point for the Basel Convention in Egypt.

Participants included *Mrs. Vicky Rockingham* and *Mr. Piet ten Brink* representing IMPEL-TFS, *Ms. Bolanle Ajai* from BCCC Nigeria, and representatives from both Cairo and Alexandria branches of EEAA, ECA, Port Authorities, The Suez Canal Authority, Industry and Police. A full list of participants is attached in annex 2 of this report.

The workshop was **opened** by *Professor Mostafa Kamel* and *Professor Mona Gamal Eldin*, the chair of EEAA, Alexandria regional office, welcomed all participants. Opening statements were also provided by *Dr. Ahmed El Sayad* of the Egyptian Customs Authority, *Ms Bolanle. Ajai* from BCCC Nigeria and by *Mrs Vicky Rockingham* from IMPEL-TFS (on behalf of Mr Gerard Wolters, former Chair of IMPEL).

The **first day** included presentations from Dr Adel Osman El Shafei who underlined the importance of the upcoming workshop and e-waste issues in Egypt. Ms Bolanle Ajai summarised the E-waste Africa Project. Mr Piet ten Brink introduced the Enforcement Manual and Mrs Vicky Rockingham provided a presentation on legislation. Mr Ahmed El Sayad provided a presentation on the current practices of Customs and challenges encountered. Mr Piet ten Brink went through the enforcement structure questionnaire and Mrs Vicky Rockingham introduced the IMPEL-training DVD; participants viewed the chapter on Collaboration. This was followed by an open discussion on current issues that focussed on accumulated wastes held by Customs. Professor Mostafa Kamel closed the proceedings of the first day.

The **second day** started with a visit to Alexandria Port. Mr. Ali Gebril, technical officer at Alexandria Customs welcomed the group, outlined procedures used to identify shipments of WEEE or used EEE, highlighting that Egyptian law prohibited the import of used equipment that was more than 5 years from the date of production. The group was taken to a container filled with used EEE and shown how to identify the age of the equipment; the IMPEL representatives commented on the lack of safety equipment used during inspection. Participants were then taken to the warehouse where items and waste seized by Customs had accumulated over a number of years. Participants returned to the venue and held a discussion about the accumulated wastes.

The **third day** began with a presentation by Vicky Rockingham on Intervention and returning shipments of waste. She then spoke on the importance of Continuity of Evidence referring to the guidance provided in the manual. A simulation exercise followed where participants were divided into two groups and asked to discuss an example of a detained container of WEEE; a lively discussion followed. Participants were then invited by Professor Mostafa



Kamel to identify one key recommendation for improving the control of illegal shipments; there were a number of suggestions. Participants were asked to vote for their top three items which were:

1. To resolve the accumulated wastes issue at Customs;
2. To establish a committee / network of decision makers with representatives from each authority;
3. To improve legislation, instructions and to focus on the enforcement manual.

Piet ten Brink and Vicky Rockingham were then invited to comment on examples of networks established in Europe. Dr Ahmed El Sayad was asked to provide his closing remarks, in which he thanked all participants, especially Mr Piet ten Brink, Mrs Vicky Rockingham and Ms Bolanle Ajai. The workshop was closed by Professor Mostafa Kamel who also thanked all participants stating that their participation had a direct impact on the success of the workshop.

Organisation committee

Professor Mostafa Kamel BCRC Egypt
Dr Adel Osman El Shafei

IMPEL members

Mr Piet ten Brink, VROM Inspectorate (NL)
Mrs Vicky Rockingham, Environment Agency (UK)



Daily reporting

Day 1: Monday, October 10

Opening

The workshop was opened by Professor Mostafa Kamel who welcomed all participants and apologised for the absence of Professor Oladele Osibanjo, Executive Director BCCC-Nigeria.



Word of welcome

Professor Mona Gamal Eldin, the chair of EEAA, Alexandria regional office, welcomed all participants, outlined the activities of her agency and pledged commitment to tackling illegal shipments of e-waste.

Opening statement Egypt Customs

Dr. Ahmed El Sayad of the Egyptian Customs Authority highlighted the difficulties encountered by Customs in Alexandria in tackling illegal shipments of e-waste. He emphasized that Customs welcomed the opportunity to participate in the workshop, the benefits this would provide to his organization and their willingness to co-operate with other enforcement authorities. He stated that 80% of used electrical electronic equipment (EEE) was imported through the Alexandria port and so recognized the important role Customs have in combating illegal imports. He recommended the establishment of local task forces consisting of representatives from Customs, government and local enforcement agencies.



Goodwill message of BCCC Nigeria

Ms. Bolanle Ajai delivered the goodwill message on behalf of Professor Oladele Osibanjo. She apologized on the behalf of the Executive Secretariat of the Basel Convention (SBC), Ms. Katarina M. Kummer, who was unable to attend. She welcomed all participants to the workshop and informed them of the objectives and progress of the SBC E-Waste Africa project. She referred to the training provided in Europe in 2010 and urged participants to refer to the Enforcement Manual during the workshop. She concluded by urging all relevant organisations represented at the workshop, to cooperate with each other to prevent illegal imports of e-waste and to consider replicating the IMPEL model within Africa.

Goodwill message by IMPEL

Mrs Vicky Rockingham provided the goodwill message on behalf of the chairman of IMPEL, Mr. Gerard Wolters, highlighting that the illegal trade in e-waste is an issue of international concern and that combating this issue required international co-operation. She outlined that IMPEL is keen to share their experiences and examples of best practice and to support the Egyptian enforcement authorities in detecting illegal shipments. She stated that the workshop provides the opportunity to improve understanding and to build networks nationally and internationally between the different enforcement authorities.

Individual introductions

Participants then introduced themselves and a group photograph was taken.

Keynote speech

Dr Adel Osman El Shafei delivered the key note speech. He underlined the importance of the upcoming workshop, while relating the workshop to the actual e-waste issue in Egypt.

E-waste Africa project

Ms Bolanle Ajai provided a presentation on the E-waste Africa Project highlighting that the national workshop was part of component 4 of the SBC e-waste project that was being delivered by IMPEL. She emphasised the importance of setting up a group to look at the draft enforcement manual to provide comments from the Egyptian perspective. She concluded that participants must think globally and act locally. Mr Ahmed Sayaad, Alexandria Customs commented that Egypt needed to be very clear in what was acceptable for import and what was not.

Inspection and Enforcement Manual

Mr Piet ten Brink introduced the Enforcement Manual highlighting that a translation into Arabic had been provided by Professor Mostafa Kamel, BCRC – Egypt. He asked participants to open their manual and he summarised the main contents of each chapter. He asked participants what they required from the manual and invited comments on the manual to be provided both during and/or after the workshop. He also emphasised the importance of participants completing the feedback form.

Legislation

Mrs Vicky Rockingham provided a presentation on International and Regional legislation, covering the Basel Convention, the Bamako Convention, the Montreal Protocol and the European Waste Shipments Regulation. Dr Adel Shafei (EEAA) highlighted that Egypt has domestic legislation that prohibits the import of used EEE that is more than 5 years from the date of production. There was a debate about how Customs can reclaim costs if detained shipments are returned; current practice is to auction off seized items once a court has declared that Customs were right to detain the shipment. Mrs. Vicky Rockingham explained that the Basel Convention obliges signees (country of origin of the waste) to collaborate with a return shipment procedure in case of illegal shipment. This collaboration may go as far as organizing and financing the return shipment, the cost of which would then be reclaimed from the original exporter. The financial involvement of the authorities in the country of origin will however not cover the payment of customs clearances / customs fines in the country of destination. Thus still leaving a problem to be solved among the authorities involved in the country of destination.

Working procedure Egypt Customs Authority

Mr Ahmed El Sayad provided a presentation on the current practices of Customs and the challenges they encounter. He highlighted that Customs had evidence of used EEE that was greater than 5 years from the date of production and waste paper contaminated with medical equipment; both containers are believed to have originated from Europe and these would be available for viewing on the following day during the visit to Alexandria Port. The presentation of Mr. El Sayad gave reason for interruptions and discussions, especially between the speaker and Dr Adel Elshaffe, Basel National Focal Point. Although most of the discussion remained un-translated, the essence seemed to be that a discrepancy between the text of the Basel Convention, Egyptian Environmental law and the Egypt Customs Regulations exists. This discrepancy would hamper the involvement of EEAA representatives in the case of the detection of an illegal waste-shipment and the adaptation of follow-up procedures in line with the provisions of the Basel Convention.



Enforcement Structures (and questionnaire)

Mr Piet ten Brink went through the enforcement structure questionnaire, combining this with the IMPEL presentation on enforcement structures. He highlighted that one obstacle that the authorities appeared to face is a lack of previous inter-agency co-operation. He asked if Customs used risk profiling to select containers to inspect and they responded that they do, based upon country of origin, type of goods and importer/exporter. Mr Ahmed El Sayad stated that 50% of containers in Alexandria were inspected. Collaboration with National Security, Police and Ministries of Health & Agriculture may take place as needed. Port Authorities have a local environment department that is supposed to link to the local branch of the Environmental Ministry department but only Customs has the power to inspect containers.

Mr. Piet ten Brink repeated the invitation to all agencies present to fill in the Enforcement Structures questionnaire, in order to get a more precise picture of actual procedures, tasks and competencies in relation to illegal (E-) waste shipments. This picture might make a good starting point for further discussions, aiming to address the issue more effectively.

[Please see page 14: 'outcome of the questionnaire on enforcement structures'.]

IMPEL-TFS training DVD

Mrs Vicky Rockingham introduced the IMPEL-TFS Training DVD and participants viewed the chapter on collaboration; a translator summarised the key points. Mrs Elham Refaat Sayed stated that it is important to collaborate nationally and internationally to avoid the issues of the illegal shipment of e-waste spreading to surrounding regions.

Open discussion

There then followed an open discussion. Mr Ahmed El Sayad highlighted that Customs had an issue with 'accumulated wastes' that were currently stored in their warehouse. These included items that were waste when seized, those that had become waste whilst detained by customs and items abandoned when the owners refused to pay the duty owed.

Dr Adel Elshaffei, following the discussions earlier in the day, stated that Customs must modify their procedures to prevent further accumulation and that a full inventory of the wastes accumulated must be undertaken. He proposed that a committee consisting of representatives from Customs, EEAA and relevant Ministry offices be set up to address this specific issue. Professor Mostafa Kamel noted that BCRC could play an initiating role in preparing a paper to be presented to the Secretariat of the Basel Convention.

Closure Day 1

Professor Mostafa Kamel closed the proceedings of the first day by emphasising the importance of making decisions at this workshop for how the different organisations would co-operate in the future.



Day 2: Tuesday, October 11

Introduction in Customs Office

Mr. Ali Gebril, technical officer at Alexandria Customs welcomed the group and gave an explanation of the general inspection procedure of shipments, containing E-waste or UEEE. Following his introduction, a discussion was had on the procedures and problems



encountered by Customs. Mrs Vicky Rockingham outlined that information can often be obtained from shipping lines if the original destination of a container is unclear. Mr. Piet ten Brink inquired whether a shipment, apparently containing 'expired UEEE' could be declared illegal as a whole. This is not the case. Only individual items, found to be older than 5 years of age, are held for further investigation. Other items within the same shipment can be cleared by customs, as long as the importer

fulfils Customs duties.

Container inspection(1)

The group was taken to view a container of used EEE and shown how to identify the year of production indented on the plastic moulding of a computer monitor to identify the age of the equipment; Mr. Gebril stated that stickers detailing the manufacturing date were often falsified. He also highlighted that they use internet searches on the make and model of equipment to determine the correct year of production.



There was no evidence of safety equipment in use at the port and photographic evidence was not recorded when containers were opened. Mr Piet ten Brink recommended that safety chains and gas sensors were purchased and implemented to prevent the risk of injury to inspectors; other safety equipment should also be considered. Mrs Vicky Rockingham recommended that photographic evidence also be recorded and details of each inspection documented.

Container inspection(2)

Unfortunately the container of waste contaminated with medical equipment could not be accessed and so was not viewed.



Storage of accumulated waste

The group was then taken to the warehouse where the 'accumulated wastes' are stored. This included items seized by Customs in Alexandria as well as items seized by Customs at the local airports as well as abandoned items. For seized items, the process is that the matter will be referred to a special port court where the judge will determine if the items should be released or held. Any items that are not released are put up for auction by customs on four occasions. If the item is not sold it remains in the warehouse.



Mrs Vicky Rockingham highlighted that there is a risk that the seized e-waste may then be put on the internal Egyptian market or that it is re-exported in the wrong direction, for example to Nigeria, Ghana or Benin rather than being returned to the country of destination. Mr Piet ten Brink highlighted that this had already occurred when waste seized by Customs had been illegally re-exported to Hamburg where it was detained.

The group was also shown bottles of pesticides. Mrs Elham Refaat Sayed suggested that these could be included in a UNEP programme that she is working on to remove redundant pesticides. Dr Adel Taha also suggested that there were a number of facilities within Egypt that would be able to assist in the recycling or disposal of the accumulated wastes.

Evaluation and discussion

Back in the conference room, accompanied by a boxed lunch, many lively discussions were carried out in small groups. For most EEA representatives, both from Cairo and from Alexandria, today had been the first time to visit a Port site and to observe an actual shipment of e-Waste / UEEE. Also the sight of the 'accumulated waste' brought the related problems to the close attention of all.

Professor Mostafa used the occasion to invite each participant, or at least each represented organization, to prepare a set of conclusions and recommendations for the final day of the Workshop. He asked the participants to consider the need for more structural collaboration. Each participant was to think about the benefit that such collaboration could bring and about the contribution that each represented organisation could make towards it.

Day 3: Wednesday, October 12

The number of participants increased during the first hours of the day.

Intervention

Mrs Vicky Rockingham presented the subject of Intervention (in case of a detected illegal shipment). As an introduction to her presentation, Mrs Rockingham underlined the importance of:

- national (Egyptian) legislation to implement the Basel Convention and
- frequent communication amongst the authorities, both nationally and internationally.

The presentation detailed all relevant steps in the inspection / intervention process, following the same sequence as used in chapter 6 of the Inspection and Enforcement Manual. For each step, Mrs. Rockingham gave additional points of attention. Examples mentioned:

- When collecting the complete set of documents, belonging to one shipment, do keep the possibility in mind to use the involved Shipping line as an additional source of information. One comment heard from Alexandria Customs was that the Shipping lines could not always be trusted, especially in the case of UEEE;
- When identifying the origin of the waste, be sure not to stop your search after identifying the waste-broker. The real origin of the waste, whether it is a facility or a private person, lies often one or two steps further back in the chain. It is very usual that only the authorities in the country of origin will be able to identify the real place of origin and therefore the first responsible party for the illegal shipment;
- When contacting the authorities in the country of origin (directly or via your National Focal point for the Basel Convention), be sure to share a complete set of information, resulting from your own well documented observations.



Continuity of evidence

Following the subject of Intervention, Mrs. Rockingham continued on the subject of “Continuity of evidence”, while referring to the Manual. The main message to the inspecting officer involved is to follow a clear sequence of steps and to document them in detail. This is advised to be the best way in which evidence of a possible offence can be secured. The collection of evidence in the country of destination is of key importance, especially when prosecution is to take place in the country of origin

A general observation during the presentation is that participants, although very willing to understand the message, seem to have difficulties connecting to the subject. Most participants are not involved in the inspection of shipments. Those that are, especially the Alexandria Customs officers, object to the idea of focussing the attention at any party but the importer. According to Egyptian practise and legislation, only the importer is to be prosecuted, thus reducing the need for communication with foreign authorities.

Presentation from Industry

Mr Essam Hashem, provided a presentation on the activities undertaken by his company Spearink which recycle toner cartridges.

Customs

Mr Ali Gebril presented details of the issues facing Customs, focussing on the container that the participants had been invited to view the previous day, which contained used EEE that was prohibited for import into Egypt as the equipment was older than 5 years from the date of production. Piet ten Brink stated that it was important that Customs seek information and evidence regarding the exporter of the waste.

Simulation exercise

After a brief feedback by Mr. Ali Gebril of Alexandria Customs on the follow up of the first inspected container during the port visit, Mr. Abdel Hakim Ahmed asked everyone's attention for the following simulation exercise.

Two groups of about 10 persons were formed. Each group was supplied with three sets of documentation belonging to three shipments of UEEE / E-waste. The invitation was to analyze the documents, identify the character of the goods, the place of origin and the place of destination. Also to indicate how the shipments would be classified according to Egyptian legislation and what actions would be taken if the shipment were to be imported into Egypt.

As the documentation was in different languages, none of them Arabic, people had difficulties to reach conclusions.

During the exercise, different objections were raised, such as:

- "The documentation is not complete. We would not accept this. We would hold the shipment for a maximum of four weeks until complete documentation would be received."
- Egyptian legislation regarding the import of UEEE is too loose.
- Egyptian legislation regarding the import of UEEE is too tight.



In both groups, lively discussions emerged. Professor Mostafa then proposed that we continue with the Agenda.

International collaboration and networking / Communication tool and Enforcement Network

Due to a lack of time and due to the actual procedures of Egyptian import controls, following a discussion and agreement by Mr Piet ten Brink, the chairman proposed to cancel the remaining two IMPEL presentations. The subjects of international collaboration and the (international) exchange of enforcement did not seem to be a priority for Egypt yet but more important was to improve collaboration amongst the enforcement authorities within Egypt.

Conclusions and recommendations

Professor Mostafa Kamel invited all to state briefly, one key lesson learned and/or one recommendation on the subject of effective control of illegal shipments.

As many participants faced a journey back to Cairo or elsewhere in Egypt, the intention was to finalize the discussion and to delay lunch. However, most participants, if not all, had so many contributions, that the discussion continued all afternoon.

An impression of the remarks made:

- ‘We need more control of the Shipping lines, regarding the completeness of information supply’ (Alexandria Customs) ;
- ‘We need more awareness of the general public’ (Red Sea Ports Authority) ;
- ‘The inventory, carried out so far, of the accumulated waste in Customs warehouses and in many other places, gives a lot of obstacles due to missing documentation’ (EEAA Alexandria) ;
- ‘We need to create an EEAA representative within the Alexandria Port area and strengthen import control procedures’ (EEAA Alexandria) ;
- ‘An obligatory deposit should be made by importers to ensure compliance with import legislation’ (EEAA Alexandria) ;
- ‘Design a booklet to inform the public about the do’s and don’ts in UEEE-import. [comment by EEAA-Cairo: We have one brochure explaining e-waste categories, including their constituents and their possible adverse effects on human health] ;
- ‘An international network is needed to inform us about the arrival of ships carrying suspect shipments’ (Suez Canal Authority – note that such information obligation exists and functions well for ships passing the Suez Canal) ;
- ‘What are the minimal qualifications for our Customs officers?’ and ‘We need higher qualified Customs staff’ (Consultant) ;
[Mr. Piet ten Brink highlighted the example of The Netherlands where for each 100 controlling Custom Officers, a certain number – say 3- are trained in the field of Waste Shipment. These specialized Custom officers assist their colleagues on demand. If they cannot reach a solution, the assistance of the Environmental Inspectorate is called for, who then send an inspector to the Port];
- ‘We need higher fines’ (Egypt Customs Authority - vice-chair Alexandria) ;
- ‘Create a waste-oil collection point within the Alexandria Port area’ (consultant) ;
- ‘We have a clear rule for Port procedures and Customs controls. This falls under the Import and Export ministry. It does not give a particular role to the EEAA during import or export situations.;
- ‘We have many rules from different authorities but they are not implemented within the Port procedures. The environmental responsibilities are not taken’ (Red Sea Port Authorities) ;



- ‘We do have a communication structure that involves contacting Interpol’ (Police Officer, under the Ministry of the Interior) ;
- ‘The interior ministry can/should give more support to the Fire brigade in the Port and to the issue of ‘Health Protection’ (Police officer) ;
- ‘BCRC should organize a meeting with different countries to fight the problems together’ (Police officer) ;
[Professor Mostafa Kamel replied that BCRC and EEAA take part in the upcoming COP10 and that they do organize regional workshops.]
- ‘How about providing more clear waste codes?’ (Police officer) ;
- ‘EU should impose deposits on exporters of suspect goods.’ (Egypt Industrial Council)
- ‘Why do we not cooperate better on the issue of accumulated waste?’;
- ‘EEAA offers assistance to other agencies regarding training and information materials’ (EEAA Cairo) ;
- Input for the E-waste Africa manual: ‘We need more simplified guidelines, check lists. For example a concise Field Manual. BCRC’s should be involved to collect example cases from individual countries’ (EEAA Cairo) ;

Following the individual contributions, Professor Mostafa Kamel grouped and in some instances re-phrased the conclusions and recommendations. He presented them both in English and Arabic. Thus, for English speakers, the list showed a number of new entries.

Remarks, grouped, rephrased and added:

- Simplify the E-waste Africa Manual so it is easier to handle;
- Shipment documents to be provided before shipment received (as required by Basel);
- The process of release / clearance of goods by Customs should be simplified ;
- All ministers should help each other and strengthen the relevant laws;
- Co-operation between all authorities involved in imports and exports resulting in a safe system for all imports;
- Custom officers to be provided with better safety tools to ensure that containers can be safely inspected ;
- Translate into Arabic: the Green Customs guide [SBC-publication] ;
- Consider public announcement [in the media] of Environmental criminals ;
- Establish a national committee for all E-waste related activities mentioned during this Workshop. The committee should gather frequently and it should be headed by a person with clear executive powers, whose statutory responsibility is in the area of environmental management. The committee could be extended to look into other environmental management issues ;
- Strengthen the law of the Environment ;
- Organize a specific, technical workshop within the domains of Stockholm, Rotterdam and Basel conventions for 22 Arab speaking countries ;
- Organize a workshop for members of the Egypt Industrial Council. However be very specific about subject and target group ;
- Include a *green working group* in the Workshop in the Global Harmonised System ;
- Cancel the import of used goods’;
- Establish a committee to organize the proper dismantling / recycling of the accumulated waste;



- Design and present materials for awareness raising, especially for schools, universities and traders ;
- Choose a representative from amongst the members of the (to be established) committee on accumulated waste, to contact foreign parties (donors / e.g. Finland) to help solve this problem ;
- IMPEL representatives requested documents relating to two recent shipments [Note IMPEL: documents not provided] ;
- As performed elsewhere in Egypt, organize a workshop on secure landfills in the Suez region ;
- Oblige Shipping lines to give more complete listings of cargo ;
- All shipments that involve risks should be moved under a procedure of Prior Informed Consent (PIC-procedure) ;
- Apply for assistance ‘in kind’ to obtain better safety tools, related to hazardous waste and personal health ;

Finally, an attempt was made to list a ‘Top 3’ of conclusions and recommendations. Key persons of BCRC, EEAA and Egypt Customs were invited to give their three main subjects. All present were invited to vote on the final ranking.

The three items are:

- 1 **To install a committee** that will solve the issue of the **accumulated waste**. For this committee, well qualified decision makers from each relevant authority need to be nominated. Different aspects of this problem involve an inventory of the wastes, the appointment of financial responsibility, a proposed environmentally sound handling of the waste and the logistical planning of the removal. Such a committee could be installed for Egypt as a whole, or for a specific port, e.g. Alexandria, as a pilot;
- 2 The same **committee / network** will be established to consider future issues to prevent the accumulation problems at Customs being repeated. Therefore, it should aim for **better collaboration** within Egypt, **better regulation** and **better communication** of Egyptian standards with foreign authorities;
- 3 **Capacity building**, better **instruction materials** and better **working conditions** (safety tools) are needed. This subject is to be addressed by each agency individually, however both BCRC and EEAA indicated that they are able to provide training and training materials to Ports and Customs Authorities.

The chairman asked IMPEL to provide examples of multi-agency collaboration, in the form of a committee or under a MOU. Mr. Piet ten Brink answered that examples are indeed available, be it that the examples refer to different levels of collaboration.

For example the IMPEL-TFS network provides a structural platform to exchange information on transboundary waste shipments and it also works through specific collaboration projects. An example at national level is the existence of MOUs between the Dutch VROM Inspectorate and various national enforcement bodies, such as Customs, National Police and others. An example at local level is the special ‘Rainbow team’ in the Rotterdam Port, in which all relevant authorities are represented. It operates on a case by case, or frequent meeting basis.



In relation to the instalment of a special committee or task force, the importance of the Enforcement Structures Questionnaire was underlined once more. The questions in this questionnaire may assist the different parties to identify the gaps or the contradictions in their respective regulatory and enforcement competencies. It could provide a good starting point for better collaboration.

In the near future, the Egyptian authorities represented in the Workshop, will need to identify the level and the scope of the committee.

IMPEL will provide relevant examples of well functioning collaboration structures and their underlying MOUs where applicable.

Round up and certificates

At the end of the afternoon, following words of thanks by Professor Mostafa Kamel of BCRC, by Mr. Elsayaad of Alexandria Customs and by Mrs. Vicky Rockingham of IMPEL, all present received a Certificate, acknowledging their attendance and/or contribution to this successful Workshop.

Outcomes of the questionnaire on enforcements structures

Please note: Due to the process of translation, the questionnaire has not been answered before or during the national training workshop. After the training workshop, unfortunately, we did not receive the completed the questionnaire either.

Still, the information provided during the Training Workshop, both in presentations and in discussions, gives some insight into the actual E-waste import enforcement structure.

Therefore, the answers below are given by the authors of this report.

Legal framework

In Egypt, no used computer equipment is allowed to be imported if its age is over 5 years. This is stated in Decree 603/2007 of the Minister of Commerce and Industry, amending the Law 118/1975 regulating import and export.

Involved organisations and collaborations issues

The Egyptian Customs Authority (ECA) is the only organisation involved in the enforcement of the import of E-waste and UEEE.

The Egyptian Environmental Affairs Agency (EEAA) is involved in the implementation of structures for collection and recycling of E-waste. The EEAA is also involved in activities such as awareness raising to the general public, providing knowledge and information to other authorities (such as the environmental department of Port Authorities) and in collaboration with the recycling sector.

One specific issue that could become an area of collaboration for various Egyptian organizations is the issue of *accumulated waste*. In several storage areas throughout Egypt, serious amounts of hazardous waste, amongst which is also E-waste, are being stored by the ECA. These wastes have been lost by the owner or seized by either Police or Customs. To reach a lasting solution for this accumulated waste would require collaboration between



authorities (clearing the wastes), private parties (transporting and recycling the wastes) and possibly also international organizations (providing funding and/or advice).

Legal powers and competences

ECA appear to have the powers to seize illegal shipments of waste. In such cases, the matter is referred to a specialist court, which determines whether or not the seizure was lawful. Where the decision is that the seizure was lawful, a penalty will be served upon the importer and the waste will be put up for auction (hence the accumulated waste issue for items which fail to sell at auction). The ECA indicated that they do not have the powers to return illegal shipments of waste, even where the court determines that the seizure was lawful because the waste effectively 'sits' in 'no-man's land'.

Inspections

The ECA carries out container inspections in the Port (of Alexandria) on a regular basis. They inspect both shipping documentation and the actual goods. In the case of E-waste and UEEE, the ECA is very effective in the determination of the age of the imported goods.

It is not known in detail to the authors, to which extent the ECA communicates with foreign Customs authorities regarding the place of origin of the goods.

It is clear however, that the ECA focuses primarily on the receiver of the goods, as the subject of further investigation. The importer is usually held responsible for the goods imported and for the duties that need to be paid. In the case of seizure of goods, the follow-up investigation will be rather down-stream than up-stream. For this reason, the ECA may not seek assistance of the Customs authorities in the country of origin of the goods.

The EEAA carries out inspections of facilities. The inspections are carried out, both by the regional branches of the EEAA, such as the Alexandria branch, and by its national office in Cairo. It is not known to the authors, in detail, which installations and facilities are inspected by the regional branches and which by the central office.

Material available for inspections

Not known in detail to the authors of this report.

The EEAA has developed leaflets and other information material, in collaboration with an international Twinning Project with Germany. It is not known in detail what is the content of this material and for whom it has been developed.

One item involves a 'Manual on inspection, including classification and shipment of hazardous wastes'. The content of this manual is not known to the authors of this report.



Next steps / Recommendations

The top three recommendations that the participants committed to enact are:

- **To install a committee** that will solve the issue of the **accumulated waste**. For this committee, well qualified decision makers from each relevant authority need to be nominated. Different aspects of this problem involve an inventory of the wastes, the appointment of financial responsibility, a proposed environmentally sound handling of the waste and the logistical planning of the removal. Such a committee could be installed for Egypt as a whole, or for a specific port, e.g. Alexandria, as a pilot. ;
- The same **committee / network** will be established to consider future issues to prevent the accumulation problems at Customs being repeated. Therefore, it should aim for **better collaboration** within Egypt, **better regulation** and **better communication** of Egyptian standards with foreign authorities;
- **Capacity building**, better **instruction materials** and better **working conditions** (safety tools) are needed. This subject is to be addressed by each agency individually, however both BCRC and EEAA indicated that they are able to provide training and training materials to Ports and Customs Authorities.

IMPEL observations

Enforcement:

The IMPEL representatives see possibilities for the Egypt Customs Agency (ECA) to connect strongly to the network and the activities of the WCO, especially in the field of combating illegal transboundary waste movements. Via the WCO network, ECA may be familiarized with situations of different kind, where Environmental Enforcement Authorities and Customs Authorities have developed a successful model of collaboration. Such models include technical, legal and safety aspects of E-waste inspection procedures.

Awareness raising

EEAA can play an important role in developing educational materials for both students and the general public promoting awareness of the e-waste issue in Egypt.

Promotion of sound environmental management of E-waste

EEAA, together with representatives of the Egyptian Industry sector, appear to be developing a collaboration structure. This was partly reflected in the variety of representatives of the private sector during the Egypt E-waste Workshop and also in the accounts that were given of ongoing collaboration on other environmental subjects, such as 'REACH'.

Lessons learnt

Translator:

- It would have been beneficial to have a translator available for some of the discussions that were conducted in Arabic. Professor Mostafa Kamel did provide a summary of most Arabic presentations.



- It would be useful to have an English translation of those presentations provided in Arabic.

European Training:

- There was no evidence of lessons learnt nor was a presentation provided on the European Training during the workshop.

Presentations by IMPEL:

- The following IMPEL presentations were not used for the national workshop in Egypt: International collaboration and Networking and Communication Tools and Enforcement Network.
- All the other presentations have been used.

Questionnaire:

- Participants were asked to complete the questionnaire and the importance of this was emphasised during the workshop. The questionnaire was not completed during the workshop.

Port exercise / simulation exercise:

- The port exercise did not involve testing of equipment; this was instead a port visit.
- The second container of waste contaminated with medical equipment could not be accessed. The Impel representatives offered to assist with this case and the container of used equipment if documents were forwarded to them but nothing has been received by the Impel representatives to date.
- The documents for the simulation exercise had not been translated into Arabic (they had not been provided to the organisation committee in advance) so this had made the exercise more difficult for some participants.
- Some discussions during the simulation exercise had been conducted in Arabic so it was not possible to fully understand all the issues being debated.

Enforcement Manual:

- The manual had been translated into Arabic with input by Professor Mostafa Kamel so it was judged to be a good translation.
- The page numbers in the Arabic version did not match the English version which made reference to the manual difficult at first; once this issue had been resolved (by reflecting the relevant page number of the Arabic version on the English version) it was possible to refer to the manual during presentations and discussions.

Name badges & presentation pack:

- Each participant received a name badge and each participant had an assigned place setting which was also labelled.
- Each participant received a document holder containing information relevant to the workshop, including a copy of the Enforcement Manual (in Arabic for the Egyptian participants and in English for the other participants) and a CD containing the presentations and participants list.

Press:

- Although a member of the press was present on the third day of the workshop, there has been no evidence of the Workshop appearing in the press; this may be due to the political situation at the time in Egypt taking precedence.



ANNEXES

- I Programme of national training workshop Egypt
 - II Participant list
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Annex I : Agenda

Day 1

8:30 – 9:00	0. Registration	
9:00 – 10:00	1. Opening ceremony: Opening statements	Prof. Heba Nassar – Deputy, Cairo University Representative of Ministry of Environment Representative of Alex. Custom Authority
	i. Goodwill message from organizations	Speech by the Executive Secretary of the Basel, Mrs Katharina M. Kummer (Delivered by BCCC-Nigeria) Speech by Mr. Gerard Wolters, IMPEL member Board (Delivered by Mrs. Vicky Rockingham of IMPEL)
	ii. Introduction of Participants	Prof. Mostafa Kamel, Director BCRC-Egypt
	iii. Keynote Address	Mr. Adel Shafei (EEAA)
	iv. Group Photo	
10:00 – 10.30	2. Overview of the E-waste issue in Egypt: - National (W)EEE chain + recent trends in Egypt	Mr. Adel Shafei (EEAA)
10.30 – 11:00	3. Introduction to the E-waste Africa project	Director BCCC-Nigeria -Prof. Oladele Osibanjo
11:00 – 11:30	Tea break	
11.30 – 12.00	4. Introduction to the enforcement manual	Mr. Piet ten Brink (IMPEL)
12:00 – 13:00	5. Legislation: - International and regional - National	Mrs. Vicky Rockingham (IMPEL) Host country delegate
13:00 – 14:00	Lunch	
14.00 – 14.30	6. Port procedures	Mr. Ahmed Sayaad – Undersecretary, Alex. Custom
14:30– 15:00	7. Enforcement structure	Mr. Piet ten Brink (IMPEL)
15.00 – 15.30	8. Results of the Enforcement structure questionnaire.	Host (Dr. Mostafa Kamel ?) + Mr. Piet ten Brink (IMPEL)
15:30 – 16:00	Tea break	
16:00 – 16.30	9. IMPEL TFS Training DVD	Mrs. Vicky Rockingham (IMPEL)
16:30 – 17.00	10. Inter-agency collaboration	Mr. Piet ten Brink (IMPEL)
17:00 – 17:30	11. Open session / Discussion	Prof. Mostafa + Mr. Sayaad
17.30 – 17.45	12. Introduction to day 2 and closing of day one	Prof. Mostafa + Mr. Saayad

Day 2

9:00	Opening day 2 - Introduction of the practical exercise with reference to parts in the enforcement manual	Mr. Sayaad + Mr. Hakeem – Alex. Custom IMPEL
	Transport to the port	Mr. Sayaad + Mr. Hakeem – Alex. Custom
	Exercise in the port (divide into 4 groups): - Inspections and investigations - Safety aspects - Classification - Testing and sampling	Mr. Sayaad + Mr. Hakeem – Alex. Custom + Environmental inspectors.
13:00 – 14:00	Lunch (on site)	
	Continuation of the exercise	Mr. Sayaad + Mr. Hakeem – Alex. Custom



		+ Environmental inspectors.
	Transport back to the venue	Mr. Sayaad + Mr. Hakeem – Alex. Custom
	Reporting back on the outcomes of the exercise	Mr. Sayaad + Mr. Hakeem – Alex. Custom + Environmental inspectors.
	Discussion	Prof. Mostafa Kamel
17:00	Introduction to day 3 and closing day 2	Prof. Mostafa Kamel

Day 3

9:00 – 9.15	Opening day 3	By Prof. Mostafa Kamel
9.15 – 9.40	Interventions	Mrs. Vicky Rockingham (IMPEL)
9.40 – 10.00	Continuity of Evidence	Mrs. Vicky Rockingham (IMPEL)
10.00 - 10.30	Introduction to the Simulation exercise	Mr. Sayaad + Mr. Hakeem
10.30 – 11.00	Tea break	
11.00 – 12.30	Simulation exercises in subgroups	Mr. Sayaad + Mr. Hakeem + Mrs. Vicky Rockingham + Mr. Piet ten Brink
12.30 – 13.00	Feedback from the subgroups	
13.00 – 14.00	Lunch	Delayed until 15.00 due to discussion during conclusion & recommendations
14.00 – 14.15	International collaboration and networking	Mr. Piet ten Brink (IMPEL)- Cancelled
14.15 – 14.30	Communication tool and Enforcement Network	Mr. Piet ten Brink (IMPEL) - Cancelled
13.00 – 16.00	Conclusions and Recommendations	prolonged
16.00 – 16.30	Presentation of Certificates	
16.30 – 17.00	Vote of thanks and closing remarks	
17.00	End	





List of at



BASEL CONVENTION



"Monitoring of transboundary movements of e-wastes and used e-equipment to Africa and the prevention of illegal traffic"

THE EGYPT NATIONAL TRAINING WORKSHOP

ALEXANDRIA, HILTON GREEN PLAZA HOTEL, 10-12 OCTOBER, 2011, EGYPT

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