

Report E-waste Africa Project Component Four

September 2012



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1. Introduction

The E-waste Africa Project is a comprehensive programme aiming at enhancing the environmental governance of e-wastes and at creating favorable social and economic conditions for partnerships and small businesses in the recycling sector in Africa. It is being implemented in the framework of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. The project ran from November 2008 to March 2012. The project is implemented by the Basel Convention Coordinating Centre based in Nigeria and the Basel Convention Regional Centre based in Senegal, in cooperation with partners including the Swiss Federal Laboratories for Materials Science and Technology (EMPA), the Institute for Applied Ecology (the Okö-Institute), the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL), the United Nations Educational, Scientific and Cultural Organization (UNESCO), and the Partnership for Action on Computing Equipment (PACE). The Secretariat of the Basel Convention (SBC) is responsible for the overall project coordination.

Overall, the project goal is to enhance the capacity of West Africa and other African countries to tackle the growing problem of e-waste. Specifically, the project aims to:

- I. Improve the level of information on flows of e-products and e-waste imported to West African countries and other African countries to enhance decision-making;
- II. Increase the capacity of partner countries to manage end-of-life e-equipment and e-waste at the national level;
- III. Investigate the feasibility of establishing environmentally sound materials recovery operations; and
- IV. Enhance the capacity to monitor and control transboundary movements of e-waste and to prevent illegal traffic.

The objective of the last and fourth project component, which this report refers to, aims to implement an enforcement programme in five importing states in Africa on the monitoring and control of transboundary movements of used and end-of-life e-equipment and the prevention of illegal traffic. IMPEL, together with the BCCC Nigeria and the SBC are responsible for implementing this fourth component.

The activities that are undertaken under this part of the project are to train various authorities that are responsible for monitoring and screening legal trade of used equipments and detecting and preventing illegal movements of e-waste.

A kick-off meeting was held in Accra, Ghana in November 2009, with the theme “Clamping Down on Illegal Waste Shipments to Africa”; IMPEL provided technical support for this meeting. The meeting provided a platform for a ‘needs assessment’ on the control of illegal traffic of used and end of life e-products in the West African sub-region. This was followed by a two week training of 19 African regulatory and enforcement officers in Europe. These 19 officers represented four of the five participating countries.



The fifth country, Tunisia, unfortunately was not represented.

In 2011 supplementary training at national level in the remaining four participating African countries took place. These trainings were staged at the main points of entry of UEEE and e-waste in the hosting countries; the ports of Tema (Ghana), Cotonou (Benin), Lagos (Nigeria) and Alexandria (Egypt).

The year 2012 has been used to finalize the different tools, such as the 'E-waste Inspection and Enforcement Manual, for reporting and to prepare a possible follow up of project activities.

This report describes the outcomes and experiences of the activities that have been organized as part of the fourth component of the E-waste Africa Project.



2. Train-the-trainer programme in Europe

As part of the E-waste Africa Project, component four, IMPEL hosted a train-the-trainer event on e-waste inspections and enforcement. The event took place between 13 and 24 September 2010 in the Netherlands and Belgium. In total 19 officers from competent authorities in Ghana, Benin, Egypt and Nigeria and the Directors of the Basel Convention Regional Centres in Egypt and Senegal and the Basel Convention Coordinating Centre in Nigeria were trained.

The aim of the exchange programme was firstly to familiarize the participants on the enforcement of provisions of the Basel Convention, European waste of electrical and electronic equipment (WEEE) systems, both EU and global classification systems and regulatory regimes that are applicable to WEEE.

Secondly, as the training was developed according to the train-the-trainer concept, the programme contained elements focussing on training skills.

Thirdly the training should also generate input for the other deliverables under component four, namely the training curriculum for the trainings in the African countries, the toolkit and the enforcement network.



Classification exercise at an e-waste collection company in Amsterdam (Netherlands)

The training was created around six modules: A: Knowledge and awareness, B: Legislation, C: Port procedures, D: Communication and Collaboration, E: Inspection Methods and F: Train-the-trainer path. The programme consisted of a combination of theoretical sessions, practical exercises and field trips to the ports of Amsterdam, Rotterdam and Antwerp and e-waste collection and treatment sites.

The final exercise requested the participants to develop the e-waste chain as applicable in their own country and list possible intervention moments and strategies. Furthermore a preliminary discussion took place concerning the national trainings that were foreseen to be organised in 2011 in the participating African countries. Also the development of a toolkit to support the trainings and the establishment of a European – African enforcement network were considered.



Field visit to an e-waste collection and recycling company in Liege (Belgium)

3. National workshops

Between July and October 2011 training workshops were organized to train representatives from environmental authorities, inspectorates, customs, police and port authorities and others in four selected African countries, namely Ghana, Benin, Nigeria and Egypt. The training workshops focused, inter alia, on the legislative framework on e-waste, inspection and investigation methods, classification of used equipment and e-waste and procedures on how to deal with illegal imports of e-waste. The workshops also included practical and simulation exercises and a visit to the port where the participants were expected to discuss port procedures, inspections, safety matters and the identification of e-waste.

Although the MOU stated that in five African countries training needed to be given, four have been carried out. The fifth country, Tunisia, was non-responsive to requests to get involved in this fourth component of the E-waste Africa Project.

Besides acquiring better knowledge on how to monitor and control imports of UEEE and e-waste, the participants discussed the further development of an enforcement network supported by a communication and information exchange tool. Key staff from the authorities involved was identified to become a part of the enforcement network. **For contact details please refer to annex II.**

The following workshops took place:

1. 25-27 July 2011 in Tema, Ghana
2. 5-7 September 2011 in Cotonou, Benin
3. 13-15 September 2011 in Lagos, Nigeria
4. 10-12 October 2011 in Alexandria, Egypt

3.1 Preparations

All the workshops were organized by the host organization and other relevant national authorities together with the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL), the two Regional Centers for the Basel Convention (BCRC's) in Senegal and Cairo, the Basel Convention Coordinating Centre (BCCC) for the African Region in Nigeria and the Secretariat of the Basel Convention (SBC).



Inspection exercise at Tema Port (Ghana)

The IMPEL experts had a preparatory meeting in January 2011 in Faro (Portugal) and an evaluation meeting, together with representatives from the SBC and BCCC in November 2011 in Rotterdam (Netherlands). Material developed before the workshops included a format for the workshop's agenda, power point presentations, the IMPEL training DVD, the draft e-waste enforcement manual, a questionnaire about the national enforcement structure and simulation exercises.

Also a time schedule for a port visit was developed, including the inspection of (a) container(s) and an explanation of the port procedures concerning imports of goods and administrative requirements.

It has to be noted that the planning and organization of the workshops was quite challenging and some of the decisions were taken last-minute, which for a long time created doubt at both sides; the IMPEL experts and the African officials, concerning the actual execution and quality of the workshops. The preparation phase showed that for future activities clear commitment from all partners is required and that the work should be done jointly.

3.2 Participation

Overall the workshops were well attended by representatives of various organizations, such as environmental ministries and inspectorates, Customs, port authorities and police.

3.3 Set up

The format and the set up of the workshops were similar as suggested by IMPEL.

The **first day** included an opening ceremony and good will messages, followed by technical sessions. These technical sessions dealt with relevant legislation concerning e-waste and transboundary movements of waste at international, regional and national level. It also included an introduction about the E-waste Africa Project, the national interagency collaboration and the health and environmental impacts of e-waste. In some countries, IMPEL showed parts of its training DVD and a short movie about some of the sources and the impacts of e-waste.



Testing of used equipment Cotonou Port (Benin)

For the **second day**, a field trip to the port was organized. During all port visits, the participants were able to inspect one out of several containers loaded with UEEE and e-waste. This was a good opportunity for the participants to practice the classification of / distinction between waste and non-waste.

In Egypt, the age of the equipment is an important criterion. The participants were shown how to identify this. Another important issue for Egypt is the accumulation of wastes seized and stored by Customs in the port.

In Ghana, a case of mislabeling with stickers indicating the coolants was discovered. The stickers mentioned that CFC-free coolants were used, but in fact the equipments contained ozone depleting substances.

During the port inspection in Benin, the participants found equipment that should be classified as hazardous waste, such as broken and non-functional television screens.



Inspection demonstration at Tincan Island Port, Apapa, Lagos (Nigeria)

In Nigeria, the teams could not carry out proper examination of the containers as the available containers had already been opened and there were no facilities to unload the containers to physically examine the goods. A demonstration of the examination procedure was conducted instead. In one of the three containers a TV set was found with a voluntary sticker as an indication of a positive EEE-Test result of a British recycling facility.

The **third day** continued with presentations and discussions. Main items for this day were: the intervention methods in case of an illegal import, the procedure to return the illegally shipped waste to the country of export, the set up of the future European – African enforcement network and a simulation exercise.

At the end of each workshop conclusions and recommendations were agreed upon. All participants, except in Ghana, received a certificate for their participation in the workshop, followed by a closing ceremony.

3.4 Deliberations

The discussions at the four trainings in some cases showed overlap, but in other cases dealt with national specific issues.

The common discussions

Participants **shared their views** on recent developments in progress made to tackle the e-waste menace following the inception workshop of component four of the E-waste Africa Project in Ghana in November 2009.

Participants recognized the need to **work in partnership** with stakeholder institutions to facilitate the development of guidelines, policies and legislation to address the e-waste problem both at national and international level.

Participants deplored the **lack of capacity, infrastructure and institutional mechanisms** to support the process. In addition, the lack of inspection and safety equipment was highlighted.

In most countries, provisions of the Basel Convention have **not yet been implemented**, as they are yet to be domesticated into a national legislative framework. This situation makes the enforcement of the rules concerning transboundary movements of waste a challenge.

Participants noted that crude e-waste management occurs in the informal sector of the economy involving **people who may be ignorant** of the hazards of exposure to toxins in e-waste, with children and women being the most vulnerable group.

Participants observed that there is **inadequate public education and awareness** on the problems associated with the uncontrolled importation of near-end-of-life and end-of-life EEE into the country, and the lack of a clear distinction method between e-waste and used EEE.

Country specific points

In **Ghana**, participants welcomed efforts made on information exchange on the transboundary movement of e-waste and the outcome of the collaboration between Ghana and its sub-regional neighbors as well as international partners in Europe, the USA and Canada. The EPA is also undertaking various efforts to improve the management of e-waste, such as registering e-waste dealers, establishing cooperation with the scrap yard dealers and implementing import restrictions. Otherwise the hazardous waste bill, where the e-waste regulation is included, should be passed by the parliament soon. It is also considering establishing pilot projects on e-waste collection and treatment centers.

In **Benin**, **no draft legislation on e-waste exists so far. Furthermore**, the basics to perform visual inspections at the port are not in place: there is no equipment to measure gasses or radiation inside the containers and there is no container scanner available. Benin showed high interest in further collaboration and exchange of experts.

In **Nigeria**, the effort of the Nigerian Government was applauded for being the first country in Africa to have a specific legislation on electrical and electronic sector. Participants welcomed the ongoing process of registration of importers of UEEE by NESREA and noted the need to put in place a take back system by producers and manufacturers for UEEE. Further, the need for a more formal way of collaboration between the relevant authorities was recognized.



Technical session on storage of e-waste in Alexandria (Egypt)

In **Egypt**, the participants were more concerned about the waste that has accumulated in the port over the past years. It was decided to establish a committee that will deal with this issue. This committee should also develop a strategy on how to prevent future accumulation of imported wastes at the ports.

E-waste enforcement manual

As part of the training toolkit, IMPEL developed an e-waste inspection and enforcement manual. The workshops were used to introduce the manual to the participants and improve the content, based on the discussions during the workshops. The training manual consists of six chapters dealing with e-waste issue as a matter of global importance, the importance of communication and collaboration between the involved enforcement agencies, general trade procedures and

those related to the trade in UEEE and e-waste, typical procedure for the inspection of a shipment of UEEE, the distinction between waste and non-waste and the aftermath of a confirmed case of illegal trade.

Due to incomplete translation, late distribution of the manual to the participants and/or a tight schedule the discussions did not in all cases provide all the required information to complete the manual. At the Egyptian workshop, a request was made to simplify the manual and to develop an easier to handle booklet. At the training in Benin, it was recommended to develop separate country specific training manuals. It was agreed that the national established committees would discuss the manual and provide feedback to the IMPEL team. Overall the manual was viewed as a useful capacity building tool.

Enforcement structure questionnaire

To gain more insight in the enforcement structure in the participating countries, IMPEL prepared a questionnaire. The questionnaire includes the following topics: 1. port facts, 2. legal framework, 3. involved organizations and collaboration, 4. legal powers and competences, 5. inspections, 6. material available for inspections, 7. difficulties in enforcement of gaps in the structure, 8. any other relevant information.

The preliminary outcomes of the questionnaire show that various organizations have different views on the enforcement and legal structure in their country or port.

Not all countries have domesticated the provisions of the Basel Convention into national legislation, but in principle the import of hazardous waste is prohibited in all countries involved. Import restrictions on second hand goods and equipment exist in most cases for specific streams. Specific e-waste legislation is still being developed in most countries.

In terms of collaboration amongst involved authorities, it can be concluded that there are links, but these could be further strengthened and/or formalized. Collaboration with other countries is limited.

Legal powers and competence are often lacking or they are scattered among the various authorities. Efficient and effective inspection and enforcement actions are therefore complicated to implement. Coordination amongst the involved authorities is therefore crucial.

The focus of inspections, if carried out, is mainly on the importer of the goods or waste due to import duties and taxes they have to pay.

In most countries, training and information materials exist, but in many cases the participants were not aware of these materials.

Enforcement network

The set up of a practical enforcement network between African and European inspectors was also included in the programme. All participants supported the idea of the network; there were however doubts about the (financial) support for the network and its sustainability.



4. Common conclusions Recommendations

The national training workshops led to a number of recommendations at the national level. However, throughout the four workshops, common conclusions and recommendations can be seen.

The workshops brought all relevant authorities together and facilitated a discussion about the issue of illegal e-waste imports and e-waste management. This led to the recommendation to **establish national committees** that will deal with this issue and develop strategies regarding how to combat illegal e-waste imports, storage and management.

In addition to the recognition that collaboration at the national level should be further intensified, the recommendation **to link up with international networks and organizations** was also made. Besides the EU-African enforcement network that was established during the E-waste Africa Project, authorities are encouraged to get involved in other international or regional initiatives such as the INECE network and regional enforcement networks set up under the INECE umbrella.

Due to lack of national legislation on the transboundary movements of hazardous waste, including e-waste, and lack of or weak enforcement powers, countries are recommended to **treat the domestication of international laws and treaties with high priority.**

The training workshops were considered very fruitful and successful, but there is a **continued need for capacity building.** It is therefore recommended to continue with workshops and training on preventing and combating illegal trade in UEEE and e-waste. Further support on distinguishing UEEE from e-waste was indicated as a need.

The training and capacity building activities should preferably link with the Stockholm and Rotterdam conventions that deal with the sound management of chemical substances.

Another important aspect of capacity building is the **availability of safety and screening equipment.** Inspectors should be able to carry out visual examinations in a safe way, by making use of personal protection equipment (PPE). Also equipment to scan containers for gasses, radiation and loading methods should be made available.

Furthermore, it was recommended to **promote sustainable e-waste collection and recycling facilities.** This statement is closely linked to the other components of the E-waste Africa Project, but was again underlined during the training sessions.

Institutions should **continue to raise awareness** amongst the communities involved in the import and management of UEEE and e-waste. Furthermore relevant governmental agencies should be made further aware of the detrimental risks of illegal waste imports and management on human health and the environment.



It was recognized that stricter regulatory controls are only one part of the solution, but nevertheless it was strongly recommended **that governments commit more to monitoring and enforcement resources** in order to combat illegal imports of e-waste.



5. Recommendations for follow-up

Most countries expressed their intention to **continue with inspections** at the port. IMPEL is willing to provide support for the inspections by sharing knowledge and tools developed by the IMPEL network. If funding would be available, **inspectors exchange programmes** could also be considered.

The finalized **toolkit**, including the developed **E-waste Inspection and Enforcement Manual**, will be distributed and made available to all relevant partners.

To maintain and further build up the established contacts between the two regions, an **EU-Africa Enforcement Network** should be set up. This network should aim to encourage the implementation and enforcement of international, regional and national legal frameworks pertaining to the control of transboundary movements of wastes/hazardous wastes/e-waste and facilitate the cooperation and coordination between the involved countries/authorities to detect, deter and deal with illegal shipments of waste. See annex I for the draft terms of reference. As of September 2012 the Terms of Reference have not yet been agreed upon by the intended participants. The Network is therefore not yet operational.



6. Annexes



Annex I. Terms of Reference EU-Africa Enforcement Network¹

Draft 18 May 2012

1. Background

The establishment of the EU-Africa network is one of the outcomes of the Secretariat of the Basel Convention (SBC) E-waste Africa programme. The overarching goal of the programme is to enhance the capacity of West Africa and other African countries to tackle the growing problem of e-waste and thereby protect the environment as well as the health of citizens, particularly children, while providing economic opportunities. Specifically, the project aims to improve the level of information available on flows of electrical and electronic equipment (EEE) and electrical and electronic waste (e-waste) imported into West African countries; assess the baseline situation in terms of amounts of EEE imports, EEE in use and e-waste in partner countries, as well as environmental impacts of the e-waste sector; study the social-economic aspects of the increasing volumes of used EEE and e-waste; and strengthen national capacities to monitor and control transboundary movements of e-waste and to prevent illegal traffic.

Under this latter activity the European Network for the Implementation and Enforcement of Environmental Law (IMPEL) and the Basel Convention Coordinating Centre (BCCC) in Nigeria are to set up an active and practical network of entities involved in the enforcement of the legal framework pertaining to the control of transboundary movements of e-waste from Europe to Benin, Nigeria, Egypt, Ghana, and Tunisia as well as other countries by making use of already existing structures and platforms, linking and expanding them. The purpose is to establish and strengthen institutional links between regulatory and enforcement authorities in exporting and importing countries in Europe and in Africa respectively.

2. Scope

Initially the scope of the network is limited to the issue of e-waste. Given that several persistent organic pollutants regulated under the Stockholm Convention have been used in the manufacture of components of electrical and electronic equipment, namely those made of plastic, the network will also seek to address e-waste-related issues under the Stockholm Convention, where possible. Once the network is running and operational, the scope can be expanded to other waste streams and chemicals.

3. Benefits

The positive impacts of establishing and participating in the network include:

- Promoting the implementation, compliance with and enforcement of the Basel and Stockholm Conventions and other relevant regional and national legal frameworks related to the control of transboundary movements of e-waste
- Facilitating enforcement cooperation;

¹ Comment about the status of the ToR!



- Enabling information exchange on compliance and enforcement of the Basel and Stockholm Conventions and other relevant regional and national legal frameworks related to the control of transboundary movements of e-waste;
- Promoting capacity building and human resources development;
- Sharing of good practices and motivating the adoption of good environmental practices;
- Contributing to preventing and combating illegal traffic in e-waste, for instance by ensuring that Parties cooperate in achieving the objects of Article 9 of the Basel Convention;
- Creating a level-playing field for the regulated industries within and among countries.

4. Objectives

Encourage the implementation and enforcement of international, regional and national legal frameworks pertaining to the control of transboundary movements of wastes/hazardous wastes/e-waste and facilitate the cooperation and coordination between the involved countries/authorities to detect, deter and deal with illegal shipments of waste.

5. Organisation

The network brings together, as members of the network, representatives of Parties to the Basel Convention from the EU and from Africa (initially Benin, Nigeria, Egypt and Ghana).

Each participating country in the network shall appoint one point of contact (POC) within each one of the national authorities involved in the implementation and/or enforcement of the Basel Convention. The Basel Convention Competent Authority/ies and the Basel Convention Focal Points shall be among the POCs. Other POCs may be, for instance, from Customs, Port Authorities, Police, Prosecutors or Environmental Inspectorates. In addition, each participating country shall appoint one National Contact Point (NCP) from among the POCs to serve as the representative of the country in the network.

IMPEL and the Basel Convention Co-ordinating Centre for the African Region in Nigeria (BCCC) will initially serve as Secretariat to the network².

In addition, organisations or informal networks with a specific mandate to undertake activities aimed at preventing and combating illegal traffic in hazardous wastes may participate as observers in the network, for instance:

- The Basel Convention Regional Centre for Training and Technology Transfer for the Arab States in Egypt
- The Basel Convention Regional Centre for French-speaking countries in Africa in Senegal
- INECE/ WANECE
- UNODC CCP
- INTERPOL and/or regional office
- WCO and/or regional office

² The role of the Secretariat of the Basel Convention in the Network is yet to be defined.



- Others

6. Network support

The network will be supported by the Secretariat and operate under the guidance of a Steering Committee composed of all the NCPs. The Secretariat is responsible for:

- gathering and sharing relevant information and capacity building material;
- facilitating communication between the National Contact Points and Points of Contact where necessary and provide advice, if possible;
- maintaining the communication tool and training toolkit developed in the framework of the SBC E-waste Africa programme ;
- organise (virtual) meetings;
- foster cooperation with other relevant networks
- fundraise for network activities
- supporting the work of the Steering Committee
- other activities as agreed by the Steering Committee of the network

7. Roles and responsibilities

The National Contact Point will represent its country in the network. He/she will primarily have a facilitative role in terms of:

- Communicating generally with other National Contact Points about e-waste issues;
- Transmission of information such as documents of interest (Training manuals for example);
- Acting as a help desk or interface for other National Contact Points in communicating answers to problems or steering persons in the right direction (for example in cases of verifications or take backs);
- Informing other National Contact Points, through the Secretariat about national developments (for instance confirmed cases of illegal traffic or examples of good practice) and interpretations of the Convention.

A Steering Committee composed of all the NCPs and open to the participation of observers will act as the governing body of the network. The Steering Committee will provide an overall strategy to the Secretariat.

8. Activities

The activities of the members of the network should aim to facilitate the exchange of information and mutual support to monitor and tackle the illegal transboundary movements of hazardous and others waste, with an initial focus on e-waste.

Suggestions for activities are:

- Exchanging information on:
 - i. Verification requests
 - ii. Alerts
 - iii. Trends and open alerts
- Fostering cooperation to ensure the implementation of Article 9 of the Convention, for instance the return of illegal shipments of waste



- Facilitate cooperation between the network members for transboundary movements of e-waste from countries in Africa to developed countries as well as between countries within Africa for environmentally sound management of hazardous components in situations no sufficient capacities exist in the country of import.
- Further developing the knowledge and skills of involved officers by, *inter alia*:
 - i. Participating in relevant meetings
 - ii. Facilitating the exchange of inspectors
 - iii. Sharing capacity building tools
 - iv. Undertaking joint enforcement actions
 - v. Organizing physical and online trainings
 - vi. Participating in other capacity-building activities

The observers will be invited to support the network and the activities of its Secretariat and members as they deem appropriate.

9. Funding

Each host of the Secretariat will have direct control over and be responsible for the funding it may have available for the activities of the network, in accordance with its own rules and regulations. Members of the network and observers are invited to provide resources for the activities of the network. The level of activities to be carried out within the network will be directly related to the available funding.

Expected costs for 2012

- *One network meeting in the second half of 2012: costs estimated at 15,000 USD (expected that the IMPEL, BCCC and BCRCs representatives cover their own costs)*
- *At least one inspection action in each participating country: costs for IMPEL experts (4 inspectors covered divided in two inspector exchange programmes)*
- *Costs secretariat: in kind IMPEL and BCCC-Nigeria*

10. Communication procedures/tool

A communication tool would support a better and more streamlined way of communicating. Conditions:

- easy accessible
- safe
- affordable
- easy to manage

It has been suggested to use PopsSocial; a platform aiming to increase the speed of communications and uptake of new ideas and solutions to the POPs chemicals and waste problems, without losing the credibility and authority of working within the established Intergovernmental environment. By increasing the accessibility of information and creating new points of entry for knowledge to enter the decision-making process, POPsSocial promotes the efficient uptake of the chemicals and waste solutions.

Web link: <http://networking.pops.int>



11. Expected outcomes

- An active and practical network of authorities involved in the prevention and combating of illegal transboundary movements of hazardous and other wastes between European and African countries;
- Strengthened cooperation between enforcement authorities in exporting States in Europe and importing States in Africa; and
- Improved implementation and enforcement of the Basel Convention provisions pertaining to preventing and combating illegal traffic of hazardous wastes, in particular e-waste.



Annex II. Contact list

To be checked / completed.

Country	Name	Organisation	Email address	2nd Email	Phone number
Africa					
Benin	Mr. Alao Yekini AKALA	Direction Générale de l'Environnement	aakalao@yahoo.fr		+229-97223574
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