

Ways to fight against illegal sites and illegal activities of end-of life vehicles

**French ministry of
Environment, Energy and
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General directorate for risk prevention



Ministère
de l'Environnement,
de l'Énergie
et de la Mer

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Agenda

- ❑ **Fight against illegal dismantling : a strong commitment by the French government**
- ❑ **National action plan against illegal sites & activities : organisation, measures**
- ❑ **Evaluation and feedback**

Fight against illegal dismantling : a strong commitment by the French government

Issues at stake

Local environmental issues : impacts on air / soil / water / waste treatment ; illegal exports to European or third countries with less binding requirements around environmental protection...

Economic issues : distortions of competition between economic operators ; obstacles to the development of legal facilities and the achievement of European targets (reuse, recycling & recovery)

Fiscal, social ...issues : development of various illegal traffics, « black economy »...

National action plan against illegal sites & activities

2012 : Launch of the joint national action control in pilot areas (*interministerial note of November 2012*)

Joint actions organised between environmental inspection services and police forces with the support of OCLAESP (Central service fighting against infringements on environment and public health)

<http://www.gendarmerie.interieur.gouv.fr/Notre-Institution/Nos-missions/Police-judiciaire/Environnement-et-sante-publique-OCLAESP>

2013 : Extension of the joint national action control in all areas, to WEEE illegal sites and reinforcement of the organization between the competent authorities (*interministerial note of April 2015*)

2015 : Bill of energy transition for green growth

- ✓ « *The fight against illegal waste of sorting & treatment facilities as well as against associated activities, in particular illegal exports, are intensified* »
- ✓ Strengthening the powers of the mayors to evacuate « abandoned » vehicles (criminal penalties, 2 years of imprisonment & 75,000 € fine, for the abandonment of vehicles as a result of damage to fights on public or private state or local authorities)

National action plan against illegal sites & activities

- Setting up of a joint organization of interministerial control operations **at national level**
 - coordination, exchange on practices,...

- Setting up of a joint organization of interministerial control operations **at local level** : committees under the joint authority of the Prefets and procecutors (« CODAF »)

Objectives to :

- integrate in the strategic program for local environment inspection forces
- maximize the action by integrating all points of irregularity (environmental, fiscal, social related to hidden work...)
- promote synergies between administrative and penal actions

- Creation of a centralized national unit to implement the waste shipments Regulation (EC) No 1013/2006 (former it was in local unit)
 - national expert service : better efficiency in instruction and control in association with custom services, harmonization of practices...

Evaluation and feedback

	National balance on ELV		
	2012 / 2013	2014	2015
Inspections	480	461	534
Noted irregular situations	309	263	300
Formal notices	238	196	161
Deletion of sites	27	28	42
Total on 2012-2015 1 475 inspections - nearly 100 sites deleted			

Qualitative assessment

the most ...

- ✓ significant mobilization of the inspectors : capitalization of intervention, methodology
- ✓ integrate better ecology issues in local crime-dealing committees
- ✓ links created and developed between ecology and police services
- ✓ an « awareness » to the enforcement of environmental regulations for police and gendarmerie services

the least...

- ✓ long and complex procedures (follow up, running...) which can explain that « results on the ground » can be estimated insufficient (strong attempts by economic operators and professional federations)
- ✓ « burden » on state means and not on producers of waste

Key points

Actions of each Member State :

- ✓ « *Get to the root of the problem* » : when the waste shipment crosses the border : it's already almost too late »
- ✓ Means and methodologies must fall within national competence (inspection is a matter of subsidiarity)

Important input at European level

Regulation (EU) No 660/2014, amending Regulation (EC) No 1013/2006 on shipments of waste

- ✓ By January 1, 2017, a national inspection plan will be established in each Member State
- ✓ Possibility for the competent authority in Member State to require evidence from suspected illegal waste exporters in order to check the legality of shipments

Needs for improving the traceability/definition of ELV at european level

Responsibility of producers ?

Need to harmonize the EU market regarding to the purchase of metallic scrap (*make Europe metal recycling activities « cashless »*)

Thank you for attention



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