

5. TRANSBOUNDARY MOVEMENT OF E-WASTE

A. Overview of E-waste Import and Export Laws

Western Balkan countries are all party to the Basel Convention, but national reporting on transboundary movement of e-waste is still limited.

All countries signed the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal between 1997 and 2006 and have since become parts of multiple conventions. Therefore, all countries have legislations in place regarding the import, export, and transit of hazardous waste in the Western Balkans. Nevertheless, reporting on the e-waste exported quantities is limited, making it difficult to obtain a comprehensive overview on the transboundary movements in the region.

Most of the countries have implemented specific e-waste import bans, while e-waste export and transit are allowed.

Specifically, the import of e-waste and hazardous waste is explicitly banned in most of the countries in the Western Balkans. North Macedonia has introduced an import ban that refers to general waste used as energy source as opposed to e-waste, specifically. In some countries (e.g., Bosnia and Herzegovina), there is flexibility about waste import if it is imported for material or energy recovery according to the national waste management legislation. Exporting and transit of hazardous waste are allowed, and in fact hazardous waste, including e-waste, is often exported for final treatment abroad, especially in the western and eastern parts of Europe.

The import and export of UEEE are not legislated in most of the countries in the region, and the flows of UEEE are not restricted.

The high demand for UEEE generates a thriving market in the Western Balkans. Legislation regarding the import and export of EEE for reuse are not in place, but in some countries (e.g., Bosnia and Herzegovina and Montenegro, though in the latter the system is not implemented) importers and distributors of UEEE are mandated to join a PRO and fulfil their legal obligations. However, there are no monitoring and reporting systems on UEEE import and export, so information on these flows and on the real size of this market in the region is limited.

B. Overview of E-waste Import and Export Quantities

Four of the five countries report statistics to the Basel convention, though this does not provide the full picture of e-waste export in the Western Balkans.

Four of the five countries in the region have transmitted national reports to the Basel Convention between 2016 and 2020, though yearly reports are not always available for all of them. For Montenegro, the latest available report is from 2019, and no reports are available for North Macedonia.

Despite providing annual reports to the Basel Convention, not all countries show annual data in import and export flows of hazardous waste. For instance, Albania has not reported any statistics on hazardous waste since 2018. Bosnia and Herzegovina is the only country in the region that annually reports statistics. Thus, the reported quantities cannot be considered representative for all importing or exporting of e-waste occurring in the region. This is attributable to the minimal implementation of annual reporting statistics to the Basel Convention and possibly to the fact that the reporting obligation exists only for hazardous waste, thus excluding non-hazardous parts of e-waste from waste reporting.

All five countries are parties to the Basel Convention, and based on the reporting 14.6 kt of e-waste was exported abroad for treatment over the two years 2019 and 2020.



According to the Basel Convention, Bosnia and Herzegovina, Montenegro, and Serbia have exported 14.6 kt of e-waste over two years (2019-2020) for treatment and recycling abroad.

Bosnia and Herzegovina, Montenegro, and Serbia have reported e-waste statistics to the Basel Convention. Approximately 0.03 kt was exported in Bosnia and Herzegovina, which consisted mainly of refrigerators, printed circuit board (PCB), and fluorescent tubes exported to France, Slovenia, and Bulgaria. As well, 0.4 kt of PCB waste exports were reported in 2019 from Montenegro to France. In Serbia, 2.3 kt of e-waste import of CRTs from Bulgaria is reported, and 14.1 kt of e-waste is exported to e.g., Germany, the Netherlands, and Bulgaria. Based on the reporting, all e-waste is exported to EU countries, where e-waste is treated with all valuable parts recovered.

The results of the analysis of the TBM of e-waste in the Western Balkan region are presented in Table 5.

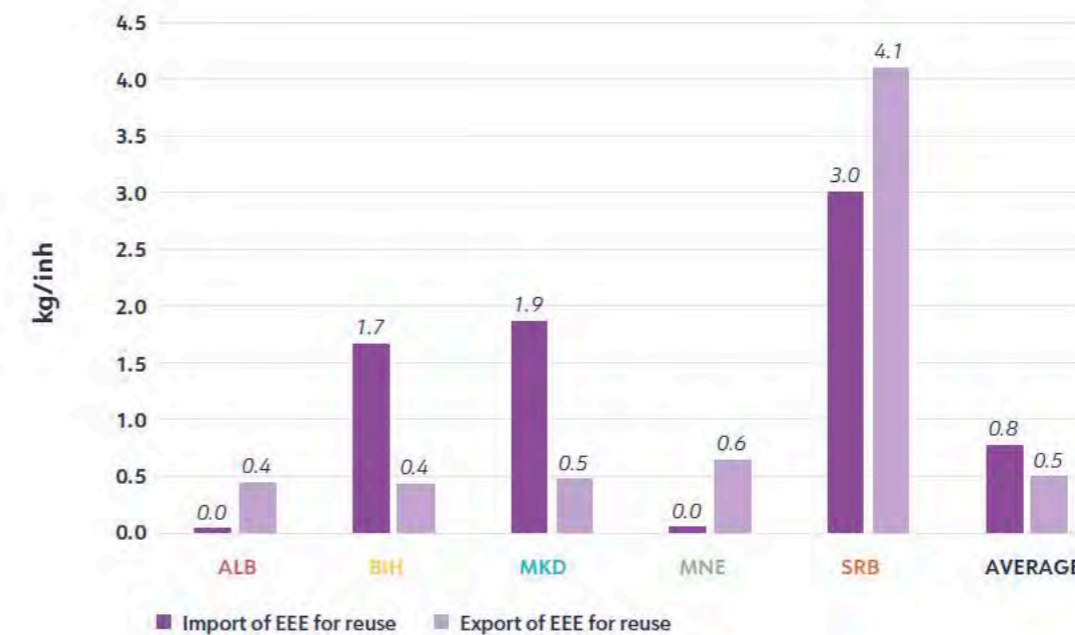
Table 5. Overview of the TBM of e-waste in the region

Country	National report available 2016 - 2020	Statistics available on hazardous waste	Estimate on e-waste reported under Basel Convention (2019 - 2020)	
			Import (kt)	Export (kt)
Albania	Yes	No	-	-
Bosnia and Herzegovina	Yes	Yes	-	0.03
North Macedonia	No	No	-	-
Montenegro	Yes, 2016 - 2019	Yes	-	0.40
Serbia	Yes, 2016, 2018 - 2020	Yes	2.32	14.12
Total	4 of 5	3 of 5	2.32	14.55

Importing and exporting of used EEE takes place in all countries in the Western Balkans-especially Serbia, North Macedonia, and Bosnia and Herzegovina.

Importing and exporting of UEEE is occurring in all five analysed countries of the Western Balkans. Serbia, specifically, imported 3.0 kg/inh and exported 4.1 kg/inh of UEEE in 2019, while North Macedonia imported 1.9 kg/inh of UEEE and exported 0.5 kg/inh. Importing and exporting of UEEE appears to be less frequent for Albania, with 0.03 kg/inh imported and 0.04 kg/inh exported, respectively. The importing and exporting of EEE for reuse in the Western Balkans for 2019 is shown in Figure 11.

Figure 11. Estimates of EEE imported and exported for reuse in 2019 (kg/inh)



C. Issues and Impacts of Imports/Exports of E-waste

Hazardous waste management laws are in place, but proper reporting and monitoring of e-waste TBM is not fully enforced in the region.

Despite being a member of the Basel Convention and applying the national legal framework and bans, reporting of e-waste TBM is limited. Consequently, the mapping and monitoring of e-waste TBM remains difficult. Official data on e-waste export from the Basel Convention is available in Bosnia and Herzegovina, Montenegro, and Serbia, but not in the two remaining Western Balkan countries. A consequence of scarce reporting is the uncertainty of whether e-waste is being exported from countries where ESM cannot be assured to countries where treatment using the best-available technology is guaranteed. As a result, TBM can directly result in a rise in illegal e-waste shipments. A particular example is the one of PCBs TBM, which can be traced back by analysing the average prices in national trade statistics. Through this analysis, it was possible to quantify PCBs TBM occurring in the region, which, per the Basel Convention reports, is mentioned only for Montenegro and Serbia, while, per the average prices analysis, it also involves Albania, Bosnia and Herzegovina, and North Macedonia.

There is TBM of UEEE in this region, and the reporting limitations don't allow differentiation between new EEE and UEEE, nor do they ensure that UEEE is not already e-waste.

Importing and exporting of UEEE is happening in all countries in the region. However, guidelines and legislations regarding these products are limited, as is the implementation of such regulations. This implies that the actual size of the UEEE market in the Western Balkans and the quantities of these flows are difficult to quantify. Furthermore, the distinction between UEEE and EEE is not shown in the HS codes, which makes it impossible to distinguish between new and used equipment, thus minimising the monitoring of these items. As a result, it is difficult to track whether the UEEE are used after importation or whether it can be considered as e-waste in the region. Also, the lack of restriction gives no indication of mentioning the UEEE's lifespan, which could help pertinent individuals understand whether the materials are worth importing as opposed to being considered undesirable importing of e-waste.

