

# A NEOCOLONIAL PLASTICS SCANDAL

THE NETHERLANDS PLAYS A LEADING ROLE IN  
THE INTERNATIONAL TRADE IN PLASTIC WASTE



**PLASTIC**  
**SOUP** FOUNDATION

# FOREWORD

*'Do you know what happens to your plastic waste after you have thrown it away?' This is how 14 year old Aeshnina Azzahra Aqilani – known as Nina – from Indonesia started her speech at the Plastic Health Summit in Amsterdam in 2021. 'It is very likely that some of it is being dumped and incinerated in the front gardens of my fellow villagers in East Java.'*<sup>1</sup>

During her presentation, Nina explains that there is not enough capacity in Indonesia to process all that imported plastic waste and that very few people realise the risks associated with plastic pollution and plastic incineration. The consequences are serious. The Brantas River, on which six million people depend for

water and food, is heavily polluted with plastic waste and microplastics. Microplastics are found in more than 80% of the fish in this river. The waste that does not end up in the river is often incinerated. This releases hazardous substances that is inhaled, falls onto fields, and becomes part of the food chain.

Despite all these problems, Western countries continue to export their plastic waste to Indonesia. Nina shows all sorts of packaging litter lying around that do not come from Indonesia. They are Western brands with labels in French, German, English and, unfortunately, Dutch. Nina's call is clear: *'Stop sending your plastic waste to my village. The children of Indonesia have the right to a safe and healthy future free of dangerous plastic pollution. So I ask you, ban the export of plastic waste to Indonesia.'*

<sup>1</sup> Watch Nina's whole speech here: [www.youtube.com/watch?v=RHbk8acijlQ](https://www.youtube.com/watch?v=RHbk8acijlQ)







Her moving speech was the reason for this research. What is the situation of the Western plastic waste that Nina finds in her village and what is the Netherlands' role? Using data from the United Nations, we have listed the main plastic waste exporters in the world in this report.

<sup>2</sup> Revision of the EU's Waste Shipment Regulation: [www.europarl.europa.eu/RegData/etudes/BRIE/2022/729330/EPRS\\_BRI\(2022\)729330\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2022/729330/EPRS_BRI(2022)729330_EN.pdf)

And what does it show? That the Netherlands is a major player in the international trade in plastic waste. According to UN information, the Netherlands is one of the top five biggest exporters of plastic waste and the export of plastic waste to non-Western countries more than doubled in 2021. Indonesia is a popular export destination.

The findings of this investigation confirm Nina's concerns. Despite the Netherlands' large role, there is still little attention for the trade in plastic waste. It is the plastic elephant in the room. In this report we call on the Dutch Government to put an end to this.

The time has come. The European Commission is currently working on updating the EU Waste Shipment Regulation.<sup>2</sup> This legislation covers the international trade in waste products, including plastics. The EU would do well to listen to Nina's call and ban the export of plastic waste to countries outside the EU. The Netherlands – as one of the biggest exporters of plastic waste – has a major responsibility in this and should support Nina by supporting a ban and thus dealing with the problem at source.

# RESEARCH

The role of the Netherlands in the international plastic waste trade in this research was assessed using information from the UN COMTRADE database.<sup>3</sup> This database contains detailed import and export information that is supplied by almost 200 states and/or regions of the world. UN COMTRADE is viewed as the most comprehensive trade data bank there is. It contains more than one billion data points of almost all traded goods in the world. The data bank is continuously updated. After standardisation, the UN's Statistics Department adds the received trade information to the UN COMTRADE database.

For this investigation, the nett weight of plastic waste was analysed in line with the 3915 trade score, the general code for all the different types of plastic waste streams, used by the UN COMTRADE database.<sup>4</sup> This data allows the import and export of plastic waste to be assessed for every country.

The focus of this investigation is the role of the Netherlands.

<sup>3</sup> [comtrade.un.org/Data](http://comtrade.un.org/Data)

<sup>4</sup> [www.dripcapital.com/hsn-code/3915](http://www.dripcapital.com/hsn-code/3915)

# FINDINGS

The most important conclusions that can be drawn from our analysis are:

- in 2021, the EU was the largest exporter of plastic waste in the world, followed by the United States and Japan;
- in 2021, the Netherlands was the largest exporter of plastic waste to non-Western countries in the EU;
- despite international legislation, the export of plastic waste from the Netherlands to non-Western countries rose significantly in 2021 compared to 2020;
- after China banned the import of plastic waste in 2018, the export of waste to Indonesia, Vietnam and Malaysia increased dramatically; and,
- in 2021, the Netherlands was the largest exporter of plastic waste to Indonesia.

## THE SHADY INTERNATIONAL TRADE IN PLASTIC WASTE

The international trade in plastic waste is a complex web of regulations and middlemen. If plastic waste is not processed in the country itself, it must be issued with a specific trade code before it can be exported. The waste may then be traded in compliance with international agreements (see the Legislation and Regulations paragraph) and be transported to various countries through waste brokers before ultimately arriving in the destination country. Money can be made in the plastic waste trade by selling plastic waste to recycling plants.

Government regulations and subsidies can make it attractive for plastic waste to be processed in other countries. This has created a lively and complex international market for plastic waste in which huge quantities of plastic waste are transported all over the world. This makes it hard to oversee the trade.



Exporting plastic waste for wealthy countries that produce and consume a lot of plastic is one way to get rid of excess plastic waste, much of which is hard to recycle<sup>5</sup>. For a long time, China was the largest importer until, in the face of large-scale pollution, it closed its borders for almost all imports of plastic waste in 2018.<sup>6</sup>

One major problem is that on paper, the export of this plastic is that it should be recycled, but for exporting countries it is impossible to check if this really happens.

<sup>5</sup> [www.cbs.nl/en-gb/news/2019/11/less-recyclable-plastic-waste-sent-to-china](https://www.cbs.nl/en-gb/news/2019/11/less-recyclable-plastic-waste-sent-to-china)

<sup>6</sup> [resource-recycling.com/resourcerecycling/wp-content/uploads/2017/07/CHN1211.pdf](https://resource-recycling.com/resourcerecycling/wp-content/uploads/2017/07/CHN1211.pdf)





# LEGISLATION AND REGULATION

## THE BASEL CONVENTION

The most important rules governing the international trade in waste products are laid down in the Basel Convention (1989). This agreement was passed to regulate the international transport and processing of hazardous waste. In May 2019, a number of changes were introduced to the Basel Convention to make the trade in plastic waste more transparent and enforceable. This took effect on 1 January 2021.

One of the most important changes was the introduction of a so-called 'Prior Informed Consent' (PIC) for mixed plastic waste.<sup>7</sup> This means that the export of plastic waste is easier to monitor and that countries may reject shipments. However, in the case of plastic waste that is separated according to type (e.g. Polyethylene, PVC or PET) and that is 'almost free from contamination', no permission is needed. Unfortunately, the Convention does not define what falls under this description so that there is room to also transport polluted plastic.

The Basel Convention specifies separate trade codes for various plastic waste streams that must be used by the relevant entities and which should make it clear whether the PIC is needed. This is a different coding system than that used for the UN COMTRADE database. All the codes in the Basel Convention fall under the umbrella of UN COMTRADE trade code 3915, but have not been made public. If this would be the case, more accurate analyses of the trade in plastic waste could be done. We cannot see what Indonesia has given or not given permission for.

As of 2021, the countries that have ratified the Convention may only export contaminated or mixed plastic waste (unseparated) to another country if that country has signed the Convention and in doing so has given permission. Countries that have not ratified the Convention, such as the United States, may make separate agreements with the receiving convention about the import and export of plastic and other waste.

<sup>7</sup> [www.basel.int/Implementation/Plasticwaste/PlasticWasteAmendments/FAQs/tabid/8427/Default.aspx](http://www.basel.int/Implementation/Plasticwaste/PlasticWasteAmendments/FAQs/tabid/8427/Default.aspx)

<sup>8</sup> [www.basel.int/Implementation/Plasticwaste/Amendments/Overview/tabid/8426/Default.aspx](http://www.basel.int/Implementation/Plasticwaste/Amendments/Overview/tabid/8426/Default.aspx)

## EU WASTE SHIPMENT DIRECTIVE

As an addition to the Basel Convention, the European Union has implemented its own legislation and regulations. The transport of waste must meet the terms of the 'Directive on shipments of waste' (1013/2006) (EU, 2006). This Directive also covers the trade in plastic waste. The export of waste that will end up in landfill in countries outside the EU is banned. Permission must be obtained from the relevant authority in the receiving country for some, not polluted, specified waste streams. For the export to countries outside the EU, 2% of the waste may be contaminated, and for export to countries within the EU, 6% may be contaminated.<sup>9</sup> 'In this case, 'contaminated' means irregular plastic waste or plastic waste that is of low quality and cannot be recycled.

The EU is currently working on modifying the legislation. The proposed new regulations on the transport of waste, including plastic, are stricter, but not strict enough. They should ensure that the European Union:

- no longer exports waste that is too difficult or expensive to recycle oneself;
- tackles the illegal export of waste more effectively; and,
- only exports what is permitted when the receiving countries can guarantee that the waste will be processed responsibly.

Despite the call of environmental organisations, up to now the proposed regulations do not impose a general ban of the export of plastic waste to countries outside the EU.

<sup>9</sup> [environment.ec.europa.eu/topics/waste-and-recycling/waste-shipments/waste-shipments-correspondents-guidelines\\_en](https://environment.ec.europa.eu/topics/waste-and-recycling/waste-shipments/waste-shipments-correspondents-guidelines_en)



## ILLEGAL EXPORT

Apart from legal waste streams, such as those included in the UN COMTRADE database, there is also a sizeable illegal trade in plastic waste. In a report<sup>10</sup> issued in 2020, Interpol noted a strong rise in criminality connected to the trade in plastic waste. In recent years, under the name of 'recycling', ever more plastic has been dumped. Criminals take advantage of the highly complicated legislation, irregular control in the export countries and the lack of control in countries that receive illegal container freight. One of the ways in which plastic waste is illegally traded is by hiding it behind bales of old paper for export. This was picked up by the TV programme 'Pointer' in the Netherlands (in Dutch) in 2021.<sup>11</sup>

<sup>10</sup> [www.interpol.int/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime](https://www.interpol.int/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime)

<sup>11</sup> [pointer.kro-ncrv.nl/zo-verdien-je-geld-aan-plastic-afval-de-zee-over-sturen](https://pointer.kro-ncrv.nl/zo-verdien-je-geld-aan-plastic-afval-de-zee-over-sturen)

## INVESTIGATION OUTCOMES:

# THE NETHERLANDS IS A POWERHOUSE IN THE TRADE IN PLASTIC WASTE

The analysis was done on the basis of the export data under the trade code 3915 (Waste, pairings and scrap of plastics) of all countries in 2021. The export of plastic waste from countries that are members of the Organisation for Economic Co-operation and Development (OECD) to non-members was then examined. This filter allows the mapping of the export from high-income countries to non-Western countries.

Table 1 shows the largest exporters in the world to non-OECD countries in 2021. As a trading block, the EU tops the list, which is unsurprising given that it comprises 27 member states. If we look at individual countries, Japan heads the list, followed by the United States. The Netherlands is in third place. It is followed at a distance by Germany and Australia. That the Netherlands is so high on the list is surprising given that the Netherlands has a much smaller population than the other countries on the list.

TABLE 1

	YEAR	COUNTRY	COUNTRY CODE	NETWEIGHT (KG) TO Niet-OESO
<b>Top exporters to non-OECD</b>	2021	European Union (all 27 member states)	EU	887.452.255
<b>Top-5 exporters to non-OECD</b>	2021	Japan	JPN	462.639.933
	2021	USA	USA	249.944.634
	2021	Netherlands	NLD	211.489.172
	2021	Germany	DEU	94.613.101
	2021	Australia	AUS	84.469.222

TABLE 2

	YEAR	COUNTRY	COUNTRY CODE	NETWEIGHT (KG) TO Niet-OESO
<b>2017-2021 NLD exports</b>	2017	Netherlands	NLD	122.187.908
	2018	Netherlands	NLD	80.787.311
	2019	Netherlands	NLD	68.031.333
	2020	Netherlands	NLD	98.214.939
	2021	Germany	DEU	94.613.101
	2021	Netherlands	NLD	211.489.172

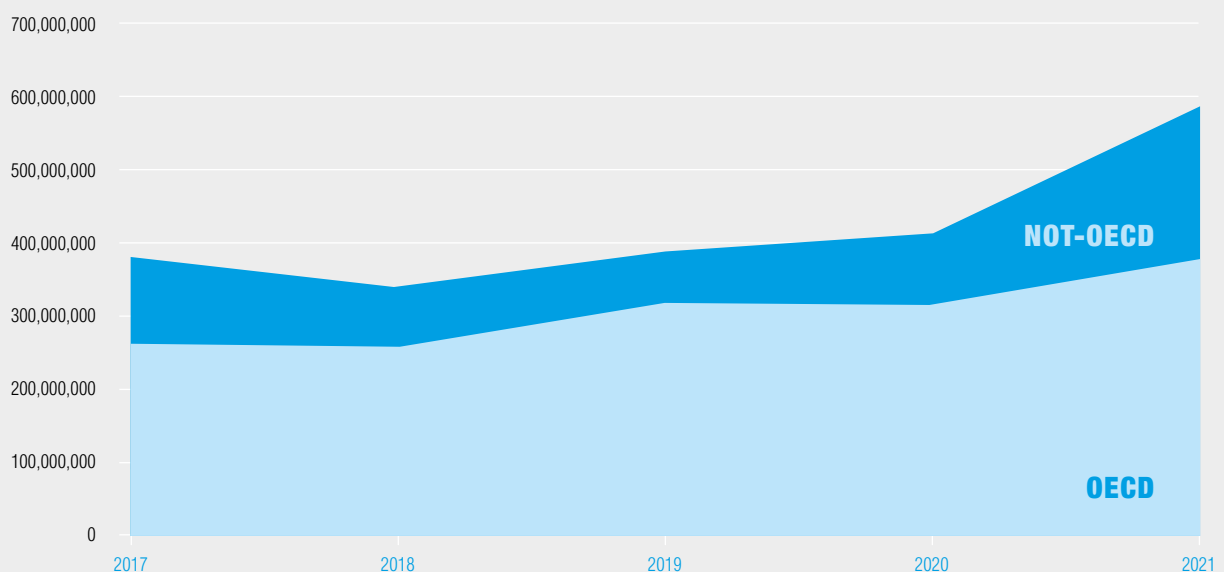
Table 2 zooms in on the Netherlands. It looks at the export to non-OECD countries over the last five years. What stands out is that, after a drop in 2018 and 2019 due to China's import ban on plastic waste, the export has grown strongly in the last two years. In 2021, it even doubled compared to 2020.

The increase stands out because, as shown in Table 1, the export to OECD countries grew much more slowly. This is especially striking because the stricter rules in the Basel Convention took effect in 2021. This should have reduced the export, but for the Netherlands this was not the case.

Table 2 shows the recipient non-OECD countries that received most of the Netherlands' plastic waste. After China's import ban, the export to non-OECD countries from the Netherlands seemed to have decreased, but it then shot up again in 2020 and 2021. Indonesia, Vietnam and Malaysia were the main destinations for plastic waste in 2021.

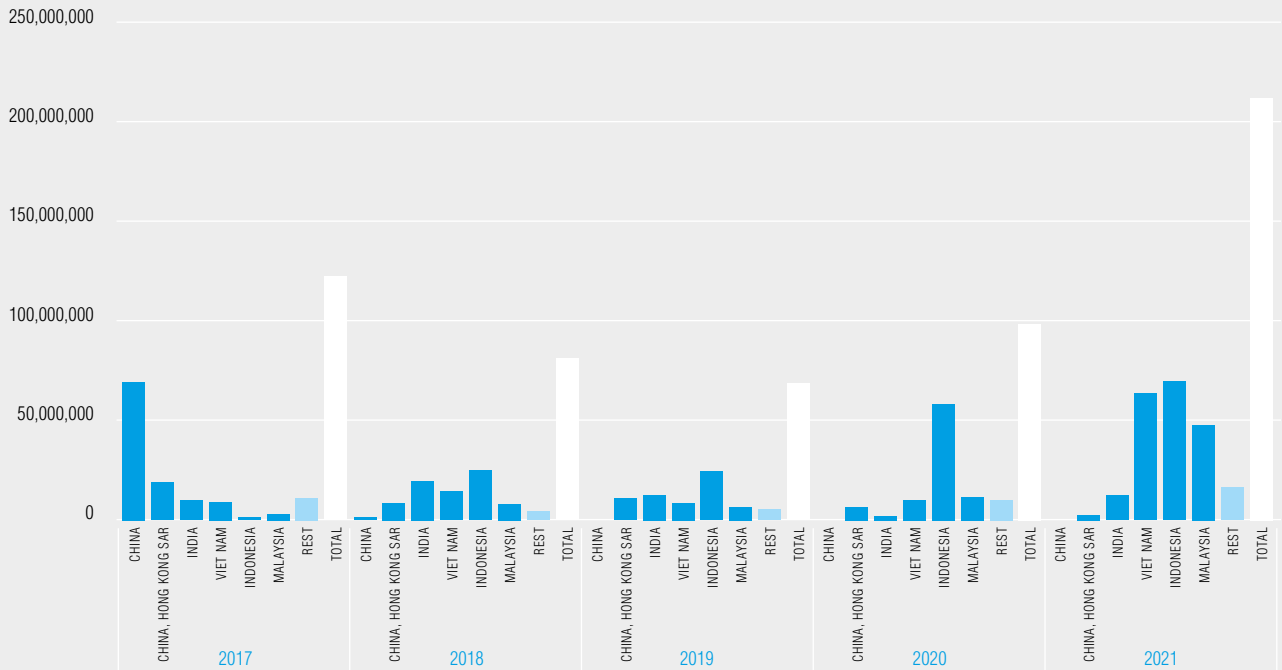
In 2021, Indonesia was the main export country from the Netherlands. If we zoom in on this trade stream, we see that the Netherlands was the biggest exporter of plastic waste to Indonesia over the last five years (see Graph 3). In 2021, the Netherlands exported almost 70 million kg of plastic waste. This made the Netherlands the largest exporter of plastic waste to Indonesia by far, a country that is unable to process so much plastic waste responsibly.

**GRAPHIC 1 2017-2021 NLD EXPORTS NETWEIGHT (KG)**

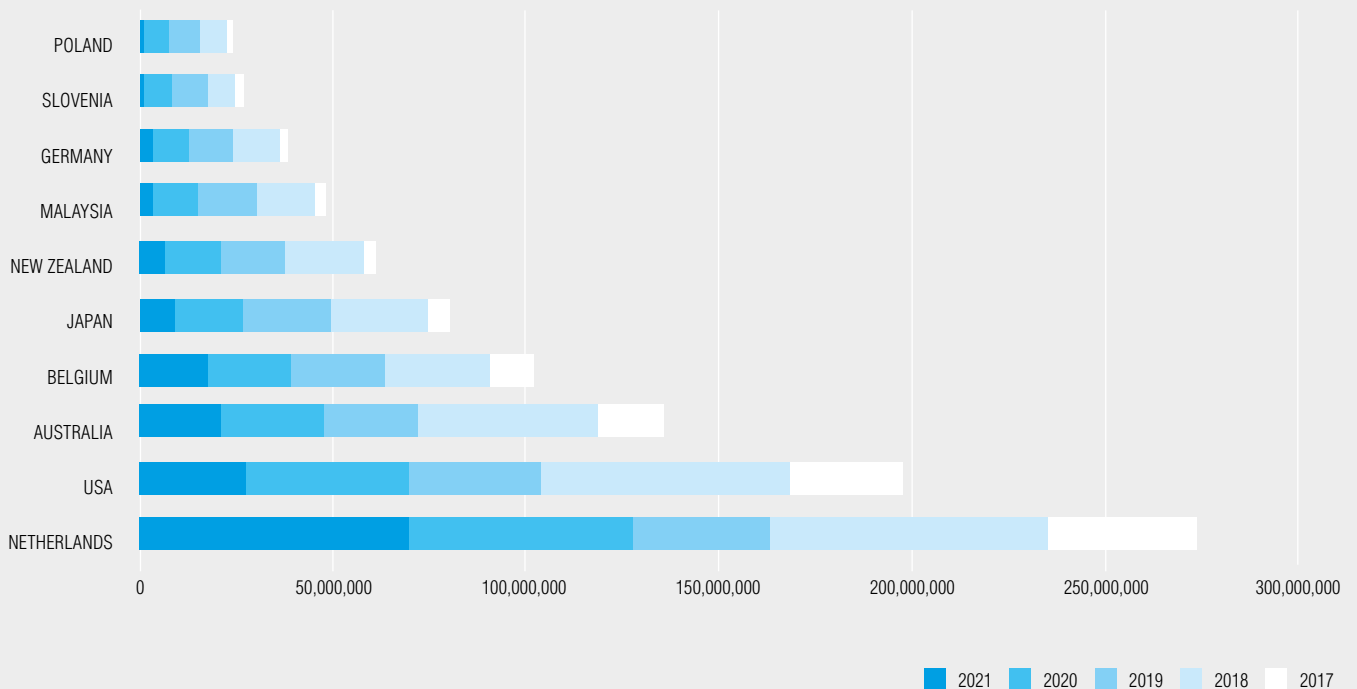




**GRAPHIC 2 NLD EXPORTS TO NON-OECD (KG)**



**GRAPHIC 3 PAST 5 YEARS OF EXPORTS TO INDONESIA NETWEIGHT (KG)**



# WASTE MANAGEMENT IN INDONESIA

When China closed its borders to almost all plastic waste in 2018, it led to a major shift in the international trade in plastic waste. Countries in Southeast Asia became popular destinations for plastic waste. They include Malaysia (57% poorly managed), Thailand (75% poorly managed) and Indonesia where 83% of the waste is not well managed.<sup>12</sup>

This high figure in Indonesia is hardly surprising when the total amount of waste is considered in the light of the processing capacity. The recycling capacity is 730,000 tonnes against 12.24 million tonnes of plastic waste.<sup>13</sup> This discrepancy puts the claim that plastic waste is exported to Indonesia for recycling in serious doubt.



Research by the International Pollutants Elimination Network IPEN in cooperation with Ecoton, an environmental organisation in Indonesia, confirm these concerns. The banks of the Brantas River are strewn with plastic waste from other parts of the world, including the Netherlands. The negative effects on both the environment and on human health are clearly visible.<sup>14</sup>



<sup>12</sup> [slacc.org.uk/wp-content/uploads/2017/12/10.-Jambeck2015.pdf](http://slacc.org.uk/wp-content/uploads/2017/12/10.-Jambeck2015.pdf)

<sup>13</sup> Independent Commodity Intelligence Services (2021). Recycling Supply Tracker – Global: <https://www.icis.com/explore>

<sup>14</sup> Plastic Waste poisons Indonesia's foodchain, november 2019: [ipen.org/sites/default/files/documents/indonesia-egg-report-v1\\_9-web.pdf](http://ipen.org/sites/default/files/documents/indonesia-egg-report-v1_9-web.pdf)

**A DIRE WARNING:**

# STOP THE EXPORT OF PLASTIC WASTE TO COUNTRIES OUTSIDE THE EU

The results of our research show that the Netherlands is a large player in the international trade in plastic waste and that – despite the modifications to the Basel Convention – more waste was exported last year to countries that are not able to process it properly, including Indonesia, Malaysia and Vietnam.

The exact reason for this cannot be drawn from the UN COMTRADE data. Greater transparency, for example by making the agreed trade codes in the Basel Convention public, could give greater clarity of the trade streams from the Netherlands. The data does show that the Netherlands is a major link in the international plastic waste trade and that a growing amount is exported to countries on the other side of the world. Countries where it is common knowledge that the plastic waste is not processed responsibly. Exporting to these countries is highly problematic and must be stopped.

The current process in updating the European Waste Shipment Directive offers opportunities to do something about this. However, the most effective measure – a ban on the export of plastic waste to countries outside the EU – is not included in the proposed changes. A ban would lead to pollution being tackled as close to the source as possible and make the illegal trade in plastic waste much more difficult. The current legislation and regulation is too complicated and leaves too much space for transporting contaminated plastic waste. A stop must be put to this.

The updating process of the EU Waste Shipment Regulation is drawing to an end. A definitive proposal from the European Commission is expected in autumn 2022. At present, it seems highly unlikely that this proposal will include an export ban on plastic waste outside the EU. The highest chance of bringing this about is if it is pushed through by the member states. As a major responsible player in this issue, the Netherlands can and should take the lead and propose a ban without exceptions on the export of plastic waste to countries outside the EU.







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