



European waste trade impacts on Malaysia's zero waste future

Case study

January 2021 – Zero Waste Europe

Introduction

The landscape of global plastic waste trade has evolved rapidly in recent years. Since China closed its doors to plastic waste imports in the beginning of 2018, the global plastic recycling industry has been facing several issues, revealing the true cost of our rampant plastic production and consumption, as well as the problems and limitations of relying on global recycling as a solution to a world suffocating in its own plastic waste.

Since then, plastic waste from one of the top biggest exporting regions – the European Union (EU) – has been diverted from China to other shores, further stressing existing infrastructure and amplifying the problems of plastic pollution in lower-income countries like Malaysia, The Philippines, Indonesia, Thailand and Vietnam, which have been receiving waste that is not safely or economically recyclable, under the pretext of "recycling".¹ This is typically a mix of recyclable and non-recyclable plastic waste and composite materials, often significantly contaminated and containing toxic additives which make safe recycling extremely difficult. Often, those shipments can be illegal as they are operated under a label misleadingly saying that the waste is recyclable and of good quality.

In an attempt to protect vulnerable countries from the social and environmental problems related to plastic waste trade, the Basel Convention², was amended in May 2019 to include new rules. These new rules require exporters to secure Prior Informed Consent (PIC)³ from importing countries for all shipments but a narrow set of non-hazardous plastic wastes. Prior Informed Consent is a consent system used in UN global policy; in the case of the Basel Convention it makes it obligatory for plastic waste exporters to inform the receiving country and obtain from them an explicit permission before sending their plastic waste. Yet, there may be exemptions from this requirement. The plastic waste exempted from requiring such explicit permission to be exported must be mostly sorted, halogen-free, free from contamination, and destined for environmentally-sound recycling. Additionally the EU Waste Shipment Regulation⁴ goes beyond and for the waste subject to PIC under the Basel Convention for other countries, EU countries are prohibited to send any of those shipments outside of the OECD countries.

These new international rules come into force in January 2021 for all shipments involving countries that are parties and have ratified the Basel Convention – that is currently 186 states and the European Union, while Haiti and the United States have signed the convention but not ratified it and thus they are not bound by it. Moreover, the Basel Ban Amendment⁵ prohibits OECD countries, the EU and Lichtenstein from exporting hazardous waste, including hazardous plastic waste, to other countries.

However, despite these rules, it's been reported that since 2018, when China introduced import restrictions on plastic waste, there has been a considerable increase in illegal waste shipments from Europe and the United States.⁶ Furthermore, momentum is growing internationally to create a global treaty on plastic pollution, signaling an important appetite from governments, business and civil society to remedy a situation that is still out of control.

The impact of waste that is generated in Europe continues to be felt in countries and communities thousands of miles away. Communities are having to deal with the effects of non-recyclable waste from Europe that is increasingly dumped

¹ INTERPOL STRATEGIC ANALYSIS REPORT: Emerging criminal trends in the global plastic waste market since January 2018.

www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime

² The Basel Convention is an international agreement ratified by 198 countries that regulates the trade of toxic waste – www.basel.int

³ www.pic.int/TheConvention/Overview/Howitworks/tabid/1046/language/en-US/Default.aspx

⁴ ec.europa.eu/environment/waste/shipments/legis.htm

⁵ ipen.org/documents/basel-ban-amendment-guide

⁶ INTERPOL STRATEGIC ANALYSIS REPORT: Emerging criminal trends in the global plastic waste market since January 2018.

www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime

or burnt. This case study illustrates the impacts inflicted by international waste trade upon South East Asia countries, specifically Malaysia, and shows how this country has responded.

In May 2020, Malaysian authorities began the process of returning more than 4,000 tonnes of contaminated, mixed plastic waste that had been illegally shipped from 20 countries, a sign of Malaysia's determination to tackle the illegal trade in plastic waste.

Most importantly, illegal plastic waste exports to Malaysia do not only impact the environment and public health, but also it undermines the truly sustainable zero waste solutions that recyclers' cooperatives, social entrepreneurs, visionary policy-makers, and innovative practitioners are showing is a viable strategy to prevent and minimise waste.

Today in Malaysia, zero waste solutions create sustainable livelihoods, save money, and protect the environment and public health.⁷ This is an innovative and effective approach to waste management that must be supported, not undermined, by the EU and the global community.

⁷ zerowasteworld.org/wp-content/uploads/Penang.pdf

Waste trade in Europe

For a long time, the EU's circular economy had been relying on waste trade. However, growing evidence of waste trade exports negatively impacting receiving countries has revealed up to what point plastic waste trade is in fact a rather cheap and unsustainable escape to EU inconsistencies regarding their sustainability claims. Ultimately, it has too often been seen as an easy way out of the waste problem rather than focusing on long-term, fair and environmentally-friendly solutions.

Up to 31 December 2020, the EU Waste Shipment Regulation⁸ left post-consumer plastic waste (waste that has been used and discarded, as opposed to waste from the process of manufacturing plastics) largely unregulated. Plastic waste destined for recycling could be exported to all countries, provided destination countries did not prohibit its import; it could also be sent for energy recovery (Waste-to-Energy incineration) in OECD countries, provided it was not hazardous. Exports for disposal were also prohibited to non-OECD countries. Each EU Member State implements the rules on penalties applicable for infringement of the provisions of the Regulation. So far, these regulations have proven to be insufficient to prevent the EU countries from exporting unsorted plastic and residual waste throughout the years. However, as of the 1st of January 2021, the transposition of the Basel Convention plastic amendments⁹, among other measures, prohibits the shipment of unsorted plastic waste from EU countries to non-OECD countries and changes can be expected.

In theory, a perfectly-managed and transparent waste trade system could potentially be part of a circular economy by ensuring that only ready-to-recycle waste of sufficient quality is shipped. However, it is important to consider the principle of proximity, enshrined in the Basel Convention and also included in the EU Waste Framework Directive¹⁰. According to this principle, a waste must be managed in the country where it is generated unless exporting it is essential to ensure it is managed in an environmentally-sound manner¹¹ (i.e. minimizing harm to human health and the environment). These are critical principles that need to be prioritised.

In fact, evidence shows us that such an ideal global waste trade system may be impossible to reach, due to a number of factors.¹² Often, plastic waste exports do not find the most environmentally-sound option to treat it, but rather to escape the cost of adequate treatment in the country where the waste was generated. Plastic waste leakage or mismanagement of such waste in receiving countries, multiplicity of actors involved in the trade including actors from organised crime, misdeclaration of the type, destination and treatment make it even more blatant there are many various loopholes in all steps of the waste's journey.

A critical blindspot refers to the quality of the materials exported and the treatment it will receive in its destination. Green-listed waste – subject to general information requirements – exported for recycling is managed by the relevant customs authorities.¹³ Customs data is available publicly through the UN COMTRADE Database¹⁴ on the type of plastic waste that is exported, including its country of origin and country of destination. However, at no point throughout this monitoring system, there is any information available on the quality of the materials exported, and neither on what actually happens to the material once it reaches its destination.

⁸ ec.europa.eu/environment/waste/shipments/legis.htm

⁹ ec.europa.eu/environment/news/plastic-waste-shipments-new-eu-rules-importing-and-exporting-plastic-waste-2020-12-22_en

¹⁰ ec.europa.eu/environment/waste/legislation/a.htm

¹¹ www.oecd.org/env/waste/environmentallysoundmanagementofwaste.htm

¹² INTERPOL STRATEGIC ANALYSIS REPORT: Emerging criminal trends in the global plastic waste market since January 2018.

www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime

¹³ See more here about green listed waste:

www.sweap.eu/wp-content/uploads/2020/08/LIFE-SWEAP-Factsheet-Green-Listed-Waste-March-2020.pdf

¹⁴ comtrade.un.org

In the context of the recent plastic waste trade restrictions (China's import ban, and the Basel Convention' amendments, as well as import restrictions adopted by South East Asian countries) there has been an increase in illegal plastic waste trade and treatment across Europe.

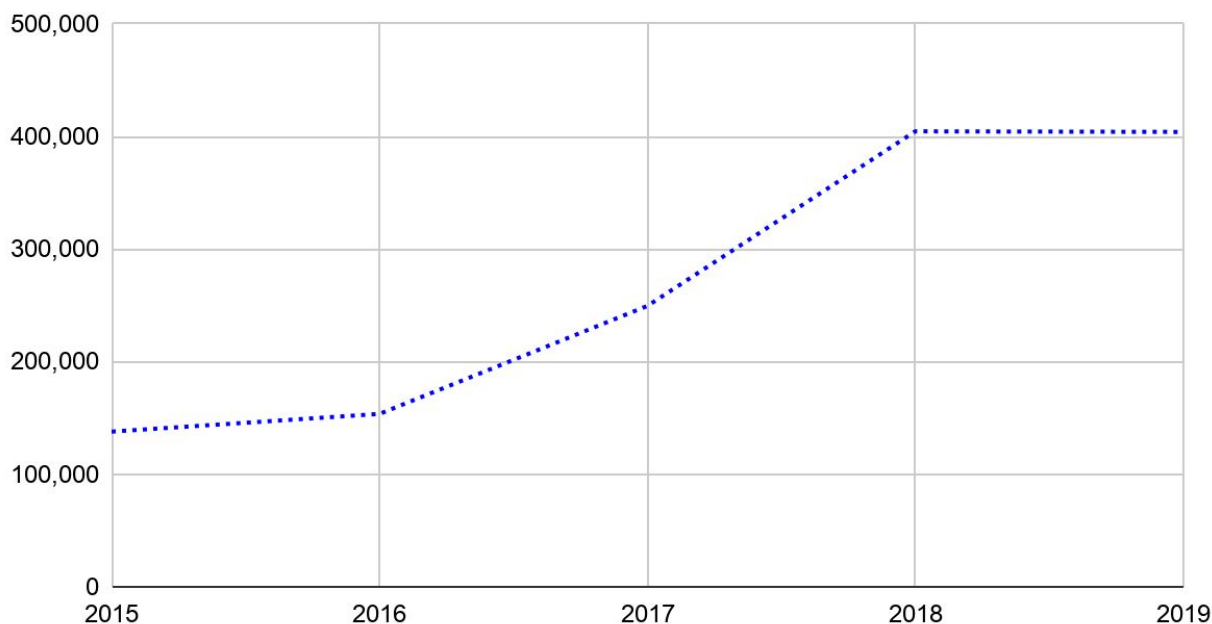
The illegal exporting of plastic waste is mostly motivated by the economic profit earned by escaping the legal and administrative road and the necessary safety compliances. Recyclable plastic can sometimes have significant value, yet, this value is often diminished by the cost of sorting and dealing with contamination and problematic additives, as well as the need to comply with strict environmental and health standards. Illegal waste dumping or exporting offers the possibility to avoid those costs, and sometimes to even avoid compliance with regulations in importing countries, when such countries have weak law-enforcement capacity. Ultimately, the low cost for virgin plastic is a clear competition to recyclable plastic, which disincentives the demand and drive to overcome the complexities of plastic recycling.

It is also to be noted that illegal waste trade mostly follows the road of the green-listed plastic waste, e.i. waste for which consent from the receiving country is not needed. Since there is no specific confirmation procedure with the receiving country, controls procedures are much lighter and thus easier to escape. Given the recent trade limitations already mentioned above we expect the motivation for these illegal practices to increase even more in the coming years, placing greater importance on the need for robust legislation and enforcement.

The impact of European waste trade in Malaysia

Besides grappling with its own plastic waste, Malaysia became the world's plastic waste dumping ground in 2018. Countries from Europe and the United States exported their plastic problems to South East Asia, after China imposed its import ban in January 2018.¹⁵ From January to November 2018, Malaysia was the number one destination for plastic waste, receiving 15.7% of the total plastic exports from the top exporting countries.¹⁶

EU28 Plastic waste exports to Malaysia (in tonnes)



Figure

Figure 1: EU plastic waste exports to Malaysia – UN COMTRADE DATA

Since then, the impacts of plastic waste trade have gained increased public attention, particularly after several local communities have been badly impacted. The Malaysian government cracked down on illegal recycling operations, and in October 2018, it announced a permanent ban that would be imposed on plastic waste imports by 2021 (with the exception of imports with specific permits that meet a number of requirements on cleanliness and homogeneity). Following this announcement, imports to Malaysia dropped steeply, but illegal shipments have continued to be sent avoiding controls. On several occasions during 2019 and 2020, the Malaysian government has returned shipping containers filled with illegal imports, e.i. mixed non recyclable waste, to exporting countries.¹⁷

¹⁵ Top 5 exporting countries/regions between January and November 2018 were: USA (16.5% of total export), Japan (15.3%), Germany (12.6%), UK (9.4%) and Belgium (6.9%). Greenpeace.org. (2019). Data from the global plastics waste trade 2016-2018 and the offshore impact of China's foreign waste import ban. [Online, accessed 15th January 2021] Available at:

www.greenpeace.org/static/planet4-eastasia-stateless/2020/06/9858a41c-gpea-plastic-waste-trade-research-briefing-v2.pdf

¹⁶ Top 5 importing countries/regions between January and November 2018 were: Malaysia (15.7% of total import), Thailand (8.1%), Vietnam (7.6%), Hong Kong (6.8%), and USA (6.1%). Data from the global plastics waste trade 2016-2018 and the offshore impact of China's foreign waste import ban. [Online, accessed 15th January 2021] Available at:

www.greenpeace.org/static/planet4-eastasia-stateless/2020/06/9858a41c-gpea-plastic-waste-trade-research-briefing-v2.pdf

¹⁷ www.businessinsider.com/malaysia-sending-back-trash-to-countries-2019-5?r=US&IR=T

www.bernama.com/en/general/news.php?id=1862070

www.bbc.com/news/uk-51176312

The challenge with plastic waste is that much of it cannot be recycled, because shipments are often highly contaminated with non-recyclable plastic, dirty waste or plastic that is of low value and too expensive to recycle, requiring infrastructure that is sometimes not even present in the country of import. These consignments therefore require labour-intensive sorting. Poorly-regulated recycling operations can release toxic volatile organic compounds and toxic wastewater, while residual waste is often mismanaged and environmentally destructive.¹⁸

The story of Jenjarom¹⁹

Jenjarom is a town located in the Selangor state in Malaysia, 25 kilometers south of Port Klang. In early 2018, Jenjarom was thrown into the global spotlight as the dumping of plastic waste in the surrounding area made locals sick as they were burdened with respiratory problems, skin rashes, eye irritation and an unbearable smell in the air.

Tan Ching Hin, a prominent local activist, noticed increasing complaints from community members about the new factories that were being illegally opened by private operators from China at the end of 2017. Since then, Tan has seen how the fruit harvest had been ruined and how wild animals in the river had disappeared, chased away by the toxic runoff from the plastic recycling factories. The health of his neighbours had also been badly impacted.

Tan started to investigate the illegal factories, all hidden in remote fields around Jenjarom. He interrogated the local property agents who helped the Chinese businessmen find lots to rent. In his first report, Tan identified 20 factories operating without licenses. When he presented his findings to the district council, his findings were dismissed.

As the support for his quest grew, more volunteers joined his cause. By July 2018, he had formed a group called Kuala Langat Environmental Protection Action Group, dedicated to trying to shut down illegal, unregulated plastic recycling factories. They held a fundraiser and began flying drones over the illegal factories to record evidence of their activities, identifying a further 38 plastic waste factories operating in the district, only one of which was licensed. They wrote letters to the authorities to take action, held meetings with the government, and also highlighted the issue in local and international media. These actions gained a lot of attention and also prompted the Malaysian government to take action.

On August 2nd, 2018, after receiving a letter from the group with their findings, an enforcement team consisting of officials from the local government, immigration, the environment department, the fire brigade, and police raided eight illegal factories, cutting off their water and electricity supplies and arresting 13 workers.

It was a moment of victory for Tan Ching Hin and the Kuala Langat Environmental Protection Action Group. Tan said that within two weeks, the factories had closed and left the area. For nearly a year, they had endured the daily smell of burning plastic, and that raid was the first of several that would sharply curb illegal plastic recycling factories in their district.

However, the residual waste from the plastics recycling industry and illegal dumping is still a severe problem. Some of it is burned illegally or sent to cement kilns, causing a new set of problems, increasing toxic emissions to the air and also through the ashes of burnt waste. A recent investigation has shown the contribution of plastic additives to toxic pollution

¹⁸ He, Z., Li, G., Chen, J., Huang, Y., An, T. and Zhang, C., 2015. Pollution characteristics and health risk assessment of volatile organic compounds emitted from different plastic solid waste recycling workshops. *Environment international*, 77, pp.85-94.

¹⁹ Adapted from DISCARDED COMMUNITIES ON THE FRONTLINES OF THE GLOBAL PLASTIC CRISIS. GAIA, APRIL, 2019. wastetradestories.org/wp-content/uploads/2019/04/Discarded-Report-April-22.pdf

Mageswari Sangaralingam, Malaysia Case Study "Breaking the Plastics Cycle in Asia". Sahabat Alam Malaysia, Friends of the Earth, Malaysia

from imported plastic wastes in Malaysia, where another tragedy related to illegal plastic waste dumping and burning in Kedah, Malaysia²⁰ has taken place.²¹

Toxic substances including lead, cadmium, molybdenum, phthalates, brominated and chlorinated flame-retardants, and polycyclic aromatic hydrocarbons were found in soil, sediment and water samples from areas of Malaysia where there is frequent foreign plastic waste dumping, recycling and open-burning. Burning of plastic waste has severe impacts on the environment and public health, producing air pollution with chemicals like dioxins and phthalates that increase the risk of cancer, fertility issues, neonatal impacts on babies, allergies and respiratory issues such as asthma and emphysema, rashes, nausea or headaches, and damages the nervous system.²²

Seeing toxic fumes rise and disperse over the sky, many residents of that region report suffering from respiratory diseases because of the organic pollutants emitted by plastic waste.²³ Companies have exploited loopholes in environmental regulations and border control of these Asian countries, often disguising hazardous waste as sorted recyclable waste, making illegal waste trade more problematic and harmful for the communities where this waste ends up.

The Malaysian government is also looking into the possibility of incineration and turning plastic trash as an alternative fuel and source for producing cement. Sahabat Alam Malaysia²⁴ (Friends of the Earth Malaysia) has been protesting, stating that the Malaysian government must not be deluded with these false solutions.²⁵

In July 2018, the Malaysian Government imposed a temporary ban on plastic waste imports. By October, the Malaysian government had announced a permanent ban on importing plastic waste by 2021. Nevertheless, imports with approved permits are still allowed, but with stricter conditions imposed on importers and exporters. The restrictions require that the waste is clean and homogenous waste from industrial and post-consumer sources, with transparency about the materials being recycled and proper factory conditions for its recycling.²⁶ After steep drops following Malaysia's crackdown, data in

²⁰ www.youtube.com/watch?v=38KNEHTm-Ds

²¹ Greenpeace malaysia case study: www.greenpeace.org/malaysia/publication/3349/the-recycling-myth-2-0

²² Verma, R., Vinoda, K. S., Papireddy, M., & Gowda, A. N. S. (2016). Toxic pollutants from plastic waste—a review. *Procedia Environ. Sci.* 35, 701-708.

²³ www.freemalaysiatoday.com/category/nation/2019/06/12/group-claims-very-unhealthy-air-quality-levels-in-kedah-town

²⁴ foe-malaysia.org/

²⁵ trashhero.org/wp-content/uploads/2019/11/False-solutions_Nov-9-2020.pdf

²⁶ Malaysia: Conditions of Import of Plastic Wastes H.S Code 3915. Enforcement date: 26 October 2018

Complete list of conditions for accepted imports are:

1. Submit clear actual pictures and categories of imported plastic waste;
2. Obtain premise compliance information from the Department of Environment through the National Solid Waste Management Department;
3. Submit the exporter (supplier)'s approval letter alongwith ISO 14000 certificate of the exporter and importer;
4. Submit a valid business licence issued by the local authority ;
5. Submit stamped and signed invoices;
6. Practice good housekeeping in the factory;
7. Have proper storage areas in the factory such as roofing and concrete floor;
8. Obtained approval from the Department of Occupational Safety and Health (DOSH) for installation and operation of machinery.;
9. Submit confirmation of actual capacity of the processing machine that is certified by an accredited body (SIRIM);
10. Set the import source ratio of 70% based on factory capacity to encourage the use of domestic plastic waste;
11. Only plastic wastes generated from industrial facilities / post consumer wastes that are homogenous and clean are allowed;
12. Submit location of disposal site of waste generated from the factory.
13. Submit list of buyers of end-product (resin);
14. Submit list of factories owned by the company;
15. Restriction of import of plastic waste from developing countries;
16. Ensure waste recycling premise is in a suitable location i.e. industrial zone;
17. Pay import levy.

the last quarter of 2018 suggested that imports began to tick up again. Throughout 2019, the quantity of imports was maintained, but much lower than in 2018.²⁷ While data from 2020 is not available through the UN Comtrade Database, reports from the United Kingdom have shown this country to have increased significantly its plastic waste exports to Malaysia in the first seven months of 2020, with 33,098 tonnes of plastic waste sent to the country, a rise of 81% on the same period last year.²⁸ Today, Tan is still worried that if they don't stay vigilant, the illegal plastic factories will come back.

In sum, the permanent ban imposed by the government to curb illegal recycling of plastic waste in Malaysia has been a positive step in the right direction but more action is needed. The illegal recyclers have shifted to other locations once the government clamped down on their activities in certain localities.²⁹ This is the case in Penang, where the proliferation of illegal recycling plants is impacting communities in a region with an excellent track record of reducing waste thanks to a pioneering zero waste journey.³⁰

18. Submit bank guarantee for imported waste.

Note: Amount and mode of payment will be determined by the Ministry of Housing and Local Government of Malaysia. This is an English translation of the conditions imposed by the Malaysian government. Source:

jpspn.kpkt.gov.my/resources/index/user_1/Pelesenan/Pengimportan_Sisa_Plastik accessed on December 9th, 2020

²⁷ Overall, Malaysia's 2018 total import of plastic waste (code HS3915) was 872,530,652 kg with a trade value of US\$183,206,795. In 2019 total import of plastic waste (code HS3915) was 333,499,816 kg with a trade value of US\$109,931,468. Data accessed from UN Comtrade on 16th January 2020.

²⁸ unearthed.greenpeace.org/2020/10/09/plastic-waste-uk-boris-johnson-malaysia

²⁹ www.thestar.com.my/news/nation/2019/06/12/its-just-about-moving-here-to-thereplastic-waste-factories-relocated-from-penang-to-kedah

³⁰ zerowasteworld.org/wp-content/uploads/Penang.pdf

Illegal waste trade jeopardises Penang's zero waste future

Long time stigmatised and unfairly portrayed as being responsible for the plastic waste crisis, South East Asian countries constitute the perfect culprit for northern countries' unsustainable practices and ways of living. Despite the false accusations, these countries are the centre of some sustainable and long-term initiatives.

The story of Penang, a state in northwest Malaysia with a population of 1,767 million, illustrates the potential of zero waste initiatives in the Global South and how illegal plastic waste trade undermines and jeopardises their development. While measures are being taken to reduce locally-generated residual waste, the State of Penang is being plagued with foreign waste that is continually being illegally shipped in.

Unrecyclable illegal exports to Penang end up illegally dumped or burned. In October 2020, Penang saw at least 11 plastic recycling factories operating illegally in Seberang Prai (Penang state).³¹ This was not the first time, as there have been several other of such illegal factories being reported in Penang,³² as well as in neighbouring states.³³

This is happening in a state that is host to various zero waste initiatives that are ready and could easily be scaled up.³⁴ Thanks to the existing zero waste policies in Penang, the state has been performing fairly well in recovering materials from its households and businesses. In 2018, it boasted the highest recycling rate in Malaysia at 43%, more than double than the national average of 21%. Further to these excellent results, the recycling rate increased to 46,61 % in 2019.³⁵

The Consumers' Association of Penang (CAP) has leveraged the existing waste segregation-at-source policy in the state of Penang, which has been enforced since the 1st June 2017. The policy was limited to separation and collection of dry and clean recyclables such as paper, plastic, glass, aluminium cans, and metals, among others. There is still room for much improvement though, as organic waste, is collected twice a week and discarded as general waste.

Therefore, CAP has focused on recovering organic waste from the residual waste by introducing various methods of composting at the household level. Starting in 2017, CAP partnered with schools and residential complexes in Penang to introduce various types of composting methods. CAP also worked closely with several schools to manage garden waste, kitchen waste, and food waste in their schools. Up until today, these activities have been undertaken whenever possible - albeit the restrictions due to the COVID-19 lockdowns in 2020, with schools closures, controls on holding public events and travel restrictions by the government.

CAP has repeatedly urged the state government to stay on course towards its zero waste goals. With Penang achieving a record-high 43% recycling rate in 2018, and 46,61 % in 2019,³³ the state has great potential in reaching even higher waste diversion and reduction targets.

³¹ www.nst.com.my/news/nation/2020/10/632538/11-plastic-recycling-factories-operating-illegally-seberang-prai

³² www.freemalaysiatoday.com/category/nation/2020/02/12/illegal-penang-plastic-recycling-plant-caught-red-handed

³³ www.freemalaysiatoday.com/category/nation/2019/05/10/now-worlds-rubbish-fouling-up-sungai-petani

³⁴ GAIA, Making a case for zero waste, Laying the Groundwork for Zero Waste. Zero Waste Cities Asia Series, Penang, Malaysia. 2019

³⁵ Solid Waste Management in Penang, Solid Waste Management Unit, Local Government Division. Presentation in the context of the event "Roadmap for Solid Waste Management in Penang". Penang, December 2020. Accessed by Friends of the Earth Malaysia.

Main highlights in Penang's zero waste journey:

- **2010:** Plastic bag levy for all plastic bags distributed by supermarkets and shopping centres. From 1st January 2021, this levy has been upped to RM1 (0.2 EUR) on peak shopping days, Thursdays to Sundays, while no plastic bags would be sold on other days.³⁶ Previously the levy had been RM 0.2 (0.041 EUR).
- **2014:** ban on polystyrene/styrofoam food containers used for take-aways.
- **2016:** Policy for segregation of waste at source is approved.
- **2017:** Segregation of waste at source is enforced and the recycling rate goes up from 39.65% in 2015 to 43.25% in 2018, and further to 46.61 % in 2019. Moreover, waste generation per capita is reduced from 1.6 kg. in 2016 to 1.2 kg in 2017. All these indicate a positive mindset towards recycling.
- **2018:** Segregation of food waste in restaurants, hotels, and factory canteens.
- **October 2018:** 'Roadmap Towards Zero Single-Use Plastics 2018-2030,' launched at federal level.³⁷ The vision of this Roadmap is to take a phased, evidence-based and holistic approach by involving all stakeholders in jointly addressing single-use plastics pollution in Malaysia.
- **November 2020:** all states in Malaysia express support for the implementation of the "No Plastic Bag" campaign in a bid to increase appreciation of the "green lifestyle" among Malaysians.³⁸

The Consumers' Association of Penang co-organised the International Zero Waste Cities Conference in October 2019.³⁹ The conference gathered more than 175 government officials, civil society organisations and zero waste practitioners together in Penang to share zero waste practices, as well as innovations in source separation, organics management, materials recovery, and plastic regulation.

The conference was organized in partnership with the Global Alliance for Incinerator Alternatives (GAIA)⁴⁰ and the Seberang Perai City Council. In addition to the plenary and breakout sessions, participants visited several local zero waste sites in Penang, highlighting successful initiatives in schools, housing estates, composting of food waste from businesses and market waste.

GAIA, in partnership with grassroots organisations and local government authorities, have been supporting cities in pursuing zero waste strategies to promote segregation and reduce waste volumes, specifically problematic plastic, with the aim of eventually eliminating dependence on harmful end-of-pipe waste disposal systems. The conference, among other things, highlighted local and national policy actions aimed at reducing single-use plastic, from material substitution by producers to outright bans in cities. Speakers from different countries in the region but also from Europe and America also spoke about success stories of zero waste initiatives.⁴¹

During the conference, GAIA Asia Pacific and its partners under the Zero Waste Cities Collaboration Project launched a compendium of Zero Waste Cities Asia Series Case Studies and a Zero Waste Cities microsite, www.zerowasteworld.org.

³⁶ www.freemalaysiatoday.com/category/nation/2020/10/16/penang-ups-plastic-bag-charge-from-20-sen-to-rm1-on-shopping-days

³⁷ 2018. Malaysia's Roadmap Towards Zero Single-Use Plastics 2018-2030. MESTECC

www.mestec.gov.my/web/wp-content/uploads/2019/03/Malaysia-Roadmap-Towards-Zero-Single-Use-Plastics-2018-20302.pdf

³⁸ www.malaymail.com/news/malaysia/2020/11/19/all-state-govts-back-implementation-of-no-plastic-bag-campaign-says-envirom/1924319

³⁹ zerowastecities.eu/the-asia-we-know

⁴⁰ www.no-burn.org

⁴¹ www.no-burn.org/asia-city-officials-showcase-solutions-to-plastic-pollution

The example of the zero waste story in Penang illustrates the enormous potential in supporting the development of zero waste strategies in the Global South. Interestingly, this is not an isolated case: the Zero Waste Cities programme in Europe,⁴² and several other examples from Latin America, US and Asia such as Kerala (India), Kamikatsu (Japan), Bandung (Indonesia) and San Fernando (The Philippines), are testimonies of the many benefits that can be reaped when enough investment and leadership is mobilised to transition towards a zero waste circular economy.⁴³

⁴² zerowastecities.eu

⁴³ zerowasteworld.org

Conclusions and recommendations

While there have been measures to curb the illegal recycling of plastics implemented globally, the case of Malaysia shows that illegal waste shipments and recycling persist. Illegal recyclers are shifting to other locations when the government clamps down on their activities in certain areas. Shipments of plastic waste are also continually being found to be coming through other ports, and the Malaysian government has revealed that the traders are now falsifying declaration forms, bringing in plastic waste by using other codes.

The problems caused by international waste trade cannot be solved by importing countries alone and require global collaboration across the board from a systemic perspective. From the production to the consumption stage, a real transformation is needed to address the issues revealed by the examples in Malaysia and many other examples.

Ultimately, tackling waste trade requires a solid commitment to reducing waste in the first place. This is not an utopia. Today, zero waste initiatives at the local, national and international level are showing that reducing waste is a feasible and successful strategy. Solutions such as product and packaging reutilisation, redesign, composting, anaerobic digestion, extended producer responsibility, refurbishment and repair, consumption habits transformation, community empowerment, and recycling – are practical, bottom-up strategies that provide some of the most effective solutions for reducing waste. Moreover, they present enormous opportunities for developing local economies sustainably.⁴⁴

There are key recommendations for the European Union with regards to the upcoming revision of Regulation (EC) No 1013/2006,⁴⁵ also known as the Waste Shipment Regulation:

- Ban the export of plastic waste outside of the EU.
- Ensure full traceability and transparency of plastic waste shipments, including within the EU. The information should be made public and available at all times. The EU and its member states should develop waste management systems of high public traceability so that the public know where their recyclables and waste are going and whether they are being properly treated.
- Reinforce monitoring and enforcement capacity to tackle illegal waste trade. Based on widely available public data, national authorities, international monitoring organisations should be given the means to control their borders.
- After understanding waste flows, the final step is to turn waste locally into a resource. By improving separate collection and recycling quality, member states would produce recycled raw materials for their economy. At the same time, the EU should continue to phase out materials that cannot be easily recycled in its member states to avoid landfilling and incineration. This step would drive companies to redesign their products.

A comprehensive set of recommendations can be found in the NGOs' briefing regarding the revision of the Waste Shipment Regulation,⁴⁶ and in the Rethink Plastic alliance's set of recommendations to solve the plastic waste trade issue.

⁴⁷

⁴⁴ Zero Waste Europe, Sustainable Finance for a Zero Waste Circular Economy (ZWCE). zerowasteurope.eu/library/sustainable-finance-for-a-zero-waste-circular-economy

⁴⁵ eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006R1013

⁴⁶ zerowasteurope.eu/library/feedback-on-impact-assessment-of-waste-shipment-regulation

⁴⁷ zerowasteurope.eu/wp-content/uploads/2021/01/rpa_waste_shipment_regulation_recommendations.pdf

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Zero Waste Europe is the European network of communities, local leaders, experts, and change agents working towards the elimination of waste in our society. We advocate for sustainable systems and the redesign of our relationship with resources, to accelerate a just transition towards zero waste for the benefit of people and planet.



GAIA is a worldwide alliance of more than 800 grassroots groups, non-governmental organizations, and individuals in over 90 countries. With our work we aim to catalyze a global shift towards environmental justice by strengthening grassroots social movements that advance solutions to waste and pollution. We envision a just, zero waste world built on respect for ecological limits and community rights, where people are free from the burden of toxic pollution, and resources are sustainably conserved, not burned or dumped.



Sahabat Alam Malaysia – Friends' of the Earth Malaysia (SAM), is an independent non-profit national organisation established in 1977 in Malaysia. Their objective is to ensure that our development choices and management of natural resources are sustainable and ecologically sound, guided by the principles of environmental justice.



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