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**Date:** Tuesday, November 30, 2021 at 8:48 PM  
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**Subject:** URGENT / ACTION NEEDED / ILLEGAL EXPORT OF GERMAN PLASTIC WASTE / NOW LOADING IN PIRAEUS

Dear Ms. Fontina Boura:

Thank you much for your continued assistance in the earlier case with Liberia. This situation is even more urgent and serious. Please help.

Jim Puckett

**ACTION NEEDED TO HALT SHIP LOADING NOW // Illegal waste shipments from Germany currently being loaded onto Ship in Piraeus en route to Vietnam**

The Basel Action Network wishes to alert Greek Authorities of the likely immediate loading and departure (Today) of 37 containers of German plastic waste which have been rejected from importation by the government of Turkey and failing to have German authorities take responsibility for them, have rebooked their departure to third countries. Already these 37 containers (in red in attached spreadsheet) have been sent part-way along their journey to the Container Port in Piraeus, Greece.

We believe that most, if not all of these 37 containers are now being loaded onto the COSCO PRIDE and are destined for Vietnam perhaps via Singapore. We have evidence that already 16 similarly rejected containers all made their way from Turkey to Vietnam via Piraeus earlier this year.

-- These containers are being loaded now as the COSCO PRIDE moored in Piraeus at 11/20 23:30 UTC. Its departure may be imminent.

-- These containers must be removed from the ship as these shipments of German plastic waste cannot legally be exported from the EU (Greece as Transit State).

We will be sending letters also to the German Government, tomorrow. But as time is of the essence as the containers are being loaded today, we have written you first as it is clear Greece must take immediate action.

Legal matters

1. If Greece perceives these shipments as originating from Germany as exporting state (as we do) and moving via Turkey through Greece to Vietnam then these are illegal as it is not legal to export these types of waste (Y46 and Y48 in Basel Annex II) from Germany to Vietnam. Under the Waste

Shipment Regulation (Article 36) such exports are illegal.

2. If Greece perceives these shipments as originating in Turkey, such exports would be illegal because Turkey has failed to duly notify the Basel Convention Competent Authority of Greece of the export to Vietnam. As a transit state under the Basel Convention (Article 6 paragraph 4) the shipment cannot proceed unless the state of Greece has transmitted to Turkey its consent to allow the shipment to move through Greece. Greece is likewise under an obligation to prevent transboundary movement of listed wastes Y48 and Y46 if it has reason to believe these will not be managed in an environmentally sound manner (Basel Article 4.2.e). Because the EU has banned the export of Y48 and Y48 by virtue of the belief that non-OECD countries should not receive wastes due to the likelihood of them not being managed in an environmentally sound manner, Greece must not consent to the transit.

Furthermore the case is clearly, beyond a legal obligation -- a moral obligation. German waste was the source of the problem, German exporters tried to export the problem, and now the German waste is on its way to Vietnam with the complicity or not of Greece, without having ever been removed from the containers loaded in Germany. Such an export of German waste to Vietnam would never be allowed had it been done directly and it must not be allowed via Greece.

#### Conclusion -- Greece Authorities must Act Now

Because of the urgency of the situation, we will be contacting the global media and others about this letter within 24 hours after we have transmitted it via email to you. It is imperative that Greece act to ensure that the containers in the attached spreadsheet not be allowed to be shipped onward from Greece. It is imperative that these containers not leave Europe. Please be assured that we stand ready to assist the Greek government as we can to facilitate the immediate apprehension, stoppage, and eventual repatriation to Germany of these 37 containers.

We are copying here the European Commission Basel Delegates as well as the European Anti-Fraud Office.

Below is a news story about the case.

<https://www.wiwo.de/unternehmen/dienstleister/plastikabfaelle-auf-irrfahrt-von-deutschland-in-die-tuerkei-und-nach-vietnam/27800828.html>

The data on COSCO PRIDE and the database of the 37 containers now in Piraeus.

Please let me know that Greece has well received this notification. And when possible please indicate the action taken.

Sincerely yours,

Jim Puckett  
Basel Action Network



**Jim Puckett**  
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**Basel Action Network**

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