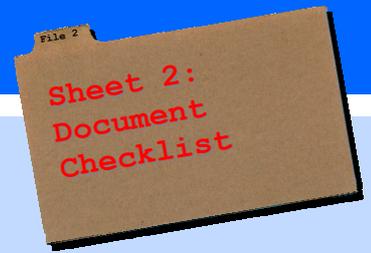


Checking of Documentation



Introduction

Careful checking of documentation of imported shipments is one of the most important tasks of officers on the front line in the battle against the ODS smugglers and can yield many valuable clues to help determine whether the shipment is legitimate or suspicious. As there are no common international standards for the labelling, naming and packaging of ODS there are a number of systems customs officers need to be familiar with. In many cases close scrutiny of papers has revealed anomalies and directly led to successful seizures. Such checking of paperwork should include the following:

✓ Check the HS code, ASHRAE & UN numbers, trade names and chemical names

Shipping documents need to be carefully checked to ensure that the classification of the consignment is consistent between the different documents such as the shipping manifest, Bill of Lading and customs declaration form. Checks should be made to ensure the trade name, chemical name, HS code, ASHRAE, CAS and UN numbers match. More details on these classification systems can be found in the UNEP Training Manual for Customs Officers. The UNEP database of the commercial trade names is also a useful resource: www.unep.ie.org/ozonaction/library/tradenames/main.asp

Above: Example of an incorrectly completed form - note the chemical formula for tetrafluoroethane (R-134a) is given as 'gas'

✓ Check the invoice, packing list and Bill of Lading

The invoice, packing list and Bill of Lading need to be checked to see that they are consistent, and that this matches with the shipping manifest.

✓ Check the country of origin is consistent with the markings on the container

It is important to check that the country of origin is consistent in the paperwork. Verify that the country of origin is a Party to the Montreal Protocol and its amendments. It is also important to check that the paperwork matches with the markings on the container.

✓ Verify the container number exists

Check the actual container number matches the documents and that this is a genuine container number. This can be verified with the shipping line or owner of the container.

✓ Check importers address, licence and history in the trade

It is common for smugglers to use fictitious company information and false addresses on the documentation, so checks should be made that the importer and business premises actually exist. The authorised licensing agency (usually the National Ozone Unit) can help to verify if the



Right: Many illegal CFC traders use residential addresses – this should arouse suspicion

importer has a valid licence to import that specific chemical. If the importer is new to the trade and has not imported this type of chemical previously, this should be treated with suspicion and may warrant further investigation.

- ✓ **If 'recycled', does the exporting country have a recycling capacity?**
Virgin CFCs can also be declared as 'used', 'recovered', 'reclaimed' or 'recycled' in an attempt to smuggle them into a country. When faced with material described in this way, the first check to make is to ensure that the exporting country has a recycling capacity. A list of recycling and reclamation capacities can be obtained from the Ozone Secretariat. Information should be requested from the importer on the source of the ODS and the name and details of the recycling facility. A sample of the chemical may need to be analysed to verify whether the ODS is recycled or not.

- ✓ **Is the shipping route viable?**
In some cases paperwork indicates shipping routes that are not logistically or economically viable. Is there a legal ODS producer in the exporting country? Has the shipment passed through one or more transshipment harbours? Has the consignment taken an elaborate route? If the shipping route does not seem to make economic sense, the consignment should be scrutinised.

- ✓ **Is the price realistic?**
A basic check should be made to determine if the value stated on the paperwork for the quantity of ODS declared is in line with international prices for CFCs. Many of the alternative chemicals to CFCs have a higher value, so if the price is not consistent with the declared commodity, this may indicate mislabelling or mis-declaration of the shipment. In some cases shipments are undervalued to avoid tax.



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