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**Thirty-Third Meeting of the Parties to  
the Montreal Protocol on Substances  
that Deplete the Ozone Layer**  
Online, 23–29 October 2021

**Information reported by the parties on illegal trade in  
ozone-depleting substances pursuant to paragraph 7 of  
decision XIV/7 and on significant cases of illegal production,  
consumption and trade in controlled substances pursuant to  
paragraph 5 (d) of decision XXXI/3**

**Note by the Secretariat**

1. In paragraph 7 of decision XIV/7, the Fourteenth Meeting of the Parties to the Montreal Protocol on Substances that Deplete the Ozone Layer requested the Secretariat to collect any information on illegal trade received from the parties and to disseminate it to all parties. Pursuant to that decision, and consistent with the Secretariat's usual practice, annex I to the present note sets out a summary of the information reported to the Secretariat since the previous note by the Secretariat on the matter (UNEP/OzL.Pro.32/INF/7).
2. In paragraph 5 (d) of decision XXXI/3, the Thirty-First Meeting of the Parties also encouraged parties to report on how significant cases of illegal production, import, export or consumption of controlled substances have been addressed and to their best knowledge what were the causes, in order to facilitate an exchange of information. Pursuant to that decision, annex II to the present note sets out a summary of the information reported to the Secretariat on the matter.
3. The annexes, containing information submitted by Angola, Bulgaria, the Netherlands and Poland, are presented without formal editing. Information on cases of illegal trade reported to the Secretariat is available on the Secretariat's website.<sup>1</sup>

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<sup>1</sup> <https://ozone.unep.org/countries/additional-reported-information/illegal-trade>.

## Annex I

**Summary of information on illegal trade in ozone-depleting substances reported by parties pursuant to paragraph 7 of decision XIV/7**

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Angola	22 Jun 2020	CFC-11	58 kg	from China to Angola	The trader imported without the knowledge and environmental authorization the prohibited gas. This gas was learned from the General Tax Administration (AGT).		
Angola	05 Jul 2020	CFC-12	1.606 5 kg	from China to Angola	In response to a complaint made by the General Tax Administration (AGT) on suspicion of importing prohibited refrigerants, the analysis was conducted using Refrigerant Identifier. It confirmed that although the label of the bottle said HFC-134a gas, inside the cylinder contained CFC-12		
Angola	31 May 2020	CFC-12	4.320 kg	from China to Angola	In response to a complaint made by the General Tax Administration (AGT) on the suspicion of importing prohibited refrigerants, NOU convened a working work involving the tax police and the criminal investigation service. The analyzes were made with the Refrigerant Identifier. It was confirmed that although the label of the bottle said HFC-134a gas, inside it contained CFC-12		

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Bulgaria	7 January, 2020	HFC-134a, R-404A, R-410A, HFC-32	240.9 kg (7 cylinders x 13.6 kg of HFC-134a; 10 cylinders x 10.9 kg of R-404A; 2 cylinders x 11.35 kg of R-410A; 2 cylinders x 7 kg of HFC-32)	From France to Bulgaria	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	14 January, 2020	HFC-134a	12,977 kg (966 cylinders)	From Turkey to Hungary	Disposable cylinders concealed between goods declared as auto parts in a heavy duty vehicle were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo).	Both the smuggled goods and the truck were seized. Pre-trial proceedings have been initiated against the smuggler. No further information can be given at this stage.	
Bulgaria	28 March, 2020	R-410A	22.6 kg (2 cylinders x 11.3 kg)	From Turkey to Bulgaria	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	05 May, 2020	R-404A	196kg (20 cylinders x 9.8 kg)	From Turkey to Bulgaria	Disposable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	06 May, 2020	HFC-134a and R-404A	490kg (20 cylinders x 13.6 kg of HFC-134a, 20 cylinders x 10.9 kg of R-404A)	From Turkey to Bulgaria	Disposable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	

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Bulgaria	11 May, 2020	HFC-134a	340kg (25 cylinders x 13.6 kg)	From Turkey to Germany	Disposable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	24 May, 2020	R-404A	32.7 kg (3 cylinders x 10.9 kg)	From Turkey to Bulgaria	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	24 May, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Bulgaria	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	25 May, 2020	R-452A	20 kg (2 cylinders x 10 kg)	From Turkey to Hungary	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	8 June, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Germany	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Bulgaria	8 June, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Germany	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	15 June, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Germany	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a light duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	20 June, 2020	R-448A	50 kg (5 cylinders x 10 kg)	From Turkey to Austria	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	05 September, 2020	HFC-134a and R-404A	24.5 kg (1 cylinder x 13.6 kg of HFC-134a; 1 cylinder x 10.9 kg of R-404A)	From Turkey to Germany	Disposable cylinders hidden in a light duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	06 September, 2020	R-410A and R-404A	19.6 kg (1 cylinder x 9.8 kg of R-410A; 1 cylinder x 9.8 kg of R-404A)	From Turkey to Bulgaria	Disposable cylinders hidden in a light duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was issued a sanction in correspondence with the law. The seizure and the sanction have not been confirmed by the court.	

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Bulgaria	14 September, 2020	HFC-134a	40.8 kg (3 cylinders x 13.6 kg)	From Turkey to France	Disposable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	16 September, 2020	R-404A	10.9 kg (1 cylinder)	From Turkey to Netherlands	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	4 October, 2020	R-448A	12.3 kg (1 cylinder)	From Turkey to Belgium	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	08 October, 2020	R-404A	98 kg (10 cylinders x 9.8 kg)	From Turkey to Germany	Disposable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	15 October, 2020	R-404A	10.9 kg (1 cylinder)	From Turkey to Netherlands	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Bulgaria	15 October, 2020	R-404A	10.9 kg (1 cylinder)	From Turkey to Germany	Disposable cylinder not declared was stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinder was hidden in a heavy duty vehicle.	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	03 November, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Bulgaria	Disposable cylinder hidden in a heavy duty vehicle was stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kapitan Andreevo).	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	23 December, 2020	R-410A	40 kg (4 cylinders x 10 kg)	From Turkey to Montenegro	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	23 December, 2020	R-410A	40 kg (4 cylinders x 10 kg)	From Turkey to Montenegro	Disposable cylinders not declared were stopped at the Bulgarian-Turkish border (at Kapitan Andreevo). The cylinders were hidden in a heavy duty vehicle.	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	07 January, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Bulgaria	Disposable cylinder hidden in the luggage compartment of a light duty vehicle was stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Malko Tarnovo).	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Bulgaria	07 January, 2020	HFC-134a	13.6 kg (1 cylinder)	From Turkey to Bulgaria	Disposable cylinder hidden in the luggage compartment of a light duty vehicle was stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Malko Tarnovo).	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	30 January, 2020	HFC-134a	27.2 kg (2 cylinders x 13.6 kg)	From Turkey to Romania	Disposable cylinders hidden in the luggage compartment of an autobus were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Lesovo).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	15 September, 2020	HFC-134a	22.6 kg 2 cylinders x 11.3 kg	From Serbia to Bulgaria	Reusable cylinders hidden in a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kalotina).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	29 December, 2020	HFC-134a, R-404A, HFC-32	90.7 kg (2 cylinders x 13.6 kg of HFC-134a; 5 cylinders x 10.9 kg of R-404A; 1 cylinder x 9 kg of HFC-32)	From Serbia to Bulgaria	Disposable cylinders hidden in the driver's cabin of a heavy duty vehicle were stopped by the Bulgarian customs at the Bulgarian-Turkish border (at Kalotina).	The cylinders were seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	
Bulgaria	08 July, 2019	HFC-134a	13.6 kg (1 cylinder)	From North Macedonia to Bulgaria	Disposable cylinder hidden in the luggage compartment of an automobile was stopped by the Bulgarian customs at the Bulgarian-North Macedonian border (at Blagoevgrad).	The cylinder was seized by the customs authorities and planned to be destroyed in the facilities recommended by the law or dealt with in another lawful manner. The driver was sanctioned in correspondence with the law.	The sanction was imposed in 2020 following decision by a court.

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Netherlands	16 June, 2020	HFC-134a; R-404A, R-410A, and HFC-32	Cylinders: 550 x 13, 6 kg of HFC-134a; 300 x 10, 9 kg of R-404A; 150 x 11, 3 kg of R-410A; 150 x 10 kg of HFC-32	from China to Lithuania	Following a signal from the European Anti-Fraud Office (OLAF) and in collaboration with the Dutch Customs, we intercepted a truck with refrigerants in non-refillable cylinders.	On the instructions of the F-gas authority, the non-refillable cylinders with refrigerants were taken by the importer for destruction at a recognized waste collector in the Netherlands. In addition, the importer has been fined.	
Netherlands	20 August, 2020	HFC-134a	Aerosol can: 300x130 ml	from China to Germany	We were notified of this shipment by the customs agent. After having analyzed these aerosol cans, it appeared that contrary to the label identifying HFC-227ea, they were filled with HFC-134a.	On the instructions of the F-gas authority, the refillable cylinders with refrigerants were taken by the importer for destruction at a recognized waste collector in the Netherlands.	
Netherlands	7 September, 2020	R-404A	Cylinders: 1.034 x 10 kg	from Turkey to Belgium	Following a signal from the European Anti-Fraud Office (OLAF) and in collaboration with the Dutch Customs, we intercepted a truck with refrigerants in nonrefillable cylinders. The importer did not have an allocated quota to market these refrigerants.	The refrigerants were offered for destruction by the F-gas authority at a recognized waste collector in the Netherlands at the expense of the importer	
Netherlands	22 October, 2020	HFC-134a and R-410A,	Cylinders: 35 x 13, 62 of HCF-134a and 7 x 13, 62 of R-410A	not known	During an inspection at a car parts company, we found a shipment of non-refillable cylinders. Investigation is ongoing to determine importing and exporting country	The refrigerants were offered for destruction by the F-gas authority at a recognized waste collector in the Netherlands at the expense of the importer	
Poland	05 January, 2020	HCFC-22	16 kg	From Ukraine	Smuggling	Re-export	a fine imposed
Poland	28 February, 2020	HCFC-22	27.2 kg	From Ukraine	Smuggling	Seizure	a court case, the court ruled forfeiture of the HCFCs to the State, the HCFCs to be destroyed

<i>Party</i>	<i>Date of seizure</i>	<i>Substances traded</i>	<i>Volume</i>	<i>Exporting/importing country</i>	<i>Illegal trade details</i>	<i>Action taken</i>	<i>Remark</i>
Poland	28 February, 2020	HCFC-22	27.2 kg	From Ukraine	Smuggling	Seizure	a court case, the court ruled forfeiture of the HCFCs to the State, the HCFCs to be destroyed
Poland	04 March, 2020	HCFC-22	13.6 kg	From Ukraine	Smuggling	Seizure	a court case, the court ruled forfeiture of the HCFCs to the State, the HCFCs to be destroyed
	04 March, 2020	HCFC-22	13.6 kg	From Ukraine	Smuggling	Seizure	a court case, the court ruled forfeiture of the HCFCs to the State, the HCFCs to be destroyed
	04 March, 2020	HCFC-22	4 kg (4 cylinders 1000 g each)	From Ukraine	Smuggling	Seizure	a court case, the court ruled forfeiture of the HCFCs to the State, the HCFCs to be destroyed
Poland	2020	R-404A	109 kg (11 seizures of 11 cylinders)	Shipments mainly from Ukraine, Belarus and Russia to Poland	Smuggling of non-refillable cylinders without customs declaration	Seizure, re-export of the HFCs, in one case HFCs (239 kg of HFC-134a) seized for a penal case	
		R-410A	33.9 kg (1 seizure of 3 cylinders)				
		R-507A	11.3 kg (1 seizure of 1 cylinder)				
		HFC-134a	366.9 kg (12 seizures of 23 cylinders)				
		HFC-23	37 kg (2 seizures of 4 cylinders)				

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Poland	2020	R-407C	5 726 kg (3 seizures of 491 cylinders)	from China to Poland	Import without compliant labelling	Seizure	The HFCs were released for free circulation following labelling of the cylinders and equipment as required by the EU F-gas legislation
		R-410A	1 123 kg (3 seizures of 26 items of equipment and 104 cylinders)				
		HFC-134a	10 446 kg (6 seizures of 16 pieces of equipment and 606 cylinders)				
		HFC-32	4 249 kg (11 seizures of 4 990 items of equipment)				
		HFC-227ea	1 660 kg (1 seizure of 1 cylinder)				

## Annex II

### Summary of information on significant cases of illegal production, import, export or consumption of controlled substances pursuant to paragraph 5 (d) of decision XXXI/3

<i>Party</i>	<i>Date of incident</i>	<i>Nature of incident i.e. illegal production, import, export or consumption</i>	<i>Description of the case</i>	<i>Action taken to address the case</i>	<i>Cause(s), if known</i>
Bulgaria	14 January 2020	Illegal import	966 disposable cylinders filled with HFC-134a (12 977 kg) and concealed in a heavy duty vehicle, between goods declared as auto parts, were stopped at the Bulgarian-Turkish border (at the Kapitan Andreevo customs post). The goods were exported from Turkey, transiting the territory of Bulgaria and as their final destination of import was pointed Hungary.	Both the smuggled goods and the truck were seized. Pre-trial proceedings have been initiated against the smuggler. No further information can be given at this stage.	