

## KARA PARA AKLAMADA ATIK TCARETİNİN ROLÜ

The Role of Waste Trade Method on Money Laundering

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## **Kara Para Aklamada Atık Ticareti Yönteminin Rolü**

### **Öz**

Atık ticareti aracılığı ile değer transferi yöntemi resmi finansal kurumlar kullanılmadan atığın içinde değer aktarımı için kullanılmaktadır. Atık ticareti yöntemi bankacılık sisteminde yüksek işlem maliyetlerinden kurtulmak, denetimden kaçınma ve transfer risklerinden kaçınma gibi çeşitli amaçlarla tercih edilmektedir. Ayrıca, tersine para aklamaya imkân sağlayan ve evrak gerektirmeyen gayri resmi bir değer aktarım mekanizması olan atık ticareti yöntemi, gizlilik ve personel güvenliği ön planda olduğu için terör örgütleri ve organize suç grupları tarafından istismar olasılığı ile çevrilidir. Küreselleşme ve toksikomani sömürgeciliği çağında değer tipik olarak atık ticaret ağı aracılığıyla gelişmiş ülkelere aktarılır ve atık ticareti yöntemi yoluyla yapılan değer transferi, hükümetin başarısızlığına neden olabilir, ekonomi güvenliğini tehdit edebilir, hatta gelişmekte olan ekonomiler için daha yüksek sosyal maliyetler oluşturabilir. Bu fenomenin kara para aklama doğası şimdiye kadar mevcut araştırmalarda ihmal edilmiştir. Çalışmada atık ticareti yöntemine, zehirli sömürgecilik ve atık ticareti yönetiminin kara para aklama üzerindeki rolüne ve bu bağlamda organize suç gruplarının istismarını önlemeye yönelik geliştirilebilecek stratejilere dikkat çekilmektedir.

**Anahtar Kelimeler:** Atık Ticareti Yöntemi, Değer Transferi, Kara Para Aklama, Toksikomani Sömürgeciliği, Organize Suç

## **The Role of Waste Trade Method on Money Laundering**

### **Abstract**

The waste trade method is used to transfer value inside the waste without the use of formal financial institutions. It can be used for different reasons, such as reducing high transaction costs in the banking system, minimizing auditing and transfer risks. Also, the waste trade method as an informal value transfer mechanism, which offers reverse money laundering and requires no paperwork, is surrounded by the possibility of abuse by terrorist organizations and organized crime groups, since secrecy and personal security are at the foreground. In an era of globalization and toxic colonialism, the value is typically transferred from developed countries to emerging or undeveloped countries through a waste trade network and the value transfer by waste trade can cause government failure, threaten economic security and even higher social costs for emerging economies. To date, the essence of money laundering of this phenomenon has been neglected in current research. This study will highlight the method of waste trade, the role of toxic colonialism and waste trade in third party money laundering. And, in this sense, strategies that can be established to mitigate the violence of terrorist organizations and organized crime groups.

**Keywords:** Waste Trade Method, Value Transfer, Money Laundering, Toxic Colonialism, Organized Crime

## **Introduction**

This article starts from an observation that contemporary reflection on the literature of value transfer, its theoretical debates and knowledge practices does not accommodate questions about the sociopolitical context. Even research on money laundering and terrorism financing tends to overlook the complex milieu of value transfer and production in different locales around the world. In addition to the positive trend of looking beyond the familiar perspectives, terrorism financing (TF) / anti money laundering (AML) research has incrementally opened up to the idea that a variety of factors shapes the value transfer process and its outcomes.

This is despite the fact that the promise of a professional TF/AML – one that is more diverse, embraces viewpoints and knowledge from different parts of the globe, and is ready to provincialize dominant perspectives on international money transfers– has animated scholarly endeavors for some time. The universe in which organized crime is emerging is continually changing, so the effectiveness of methods to combat threats such as TF/ML should be challenged. This article is an important testament to this embrace of value transferred and produced outside of the mainstream TF/AML research.

Value transactions and remittances are considered economic and security-wise, critical and important issues in the world. The failure to monitor the source and destination of these transactions makes it difficult to define their presence in the receiving and transmitting country's economies, as well as their function in funding illicit activity, criminal networks and terrorist organizations.

Strategies of organized crime organizations in many post-war countries for reconstruction and development rely on the value transfer of money, illicit goods, valuable minerals etc. Such high-value resources are thought to have the potential to participate a vital role in the economic recovery of their informal system. The literature on value transfer tends not to be focused on post-war contexts specifically, but post-war contexts deserve our consideration because of their particular challenges and opportunities. On the other hand, the government institutions involved in regulating the flow of funds and ensuring an equal distribution of resources were weak in the immediate transition from war. In that situation, the urgent need to generate income and value transfers will lead to inclusive consultation with organized crime organizations.

The expansion of the waste trade method in the world, after the outbreak of the post war globalization, can be attributed to the almost total absence of formal financial transaction in illegal activities, and their relatively high costs when available. In addition, strict regulation on hawala have increased the demand for waste trade market, which is a quasi-formal market. The impact of waste trade market on the world economy cannot be predicted, given the lack of figures on the outflow and movement of values.

As a result of globalization ‘the retreat of the state’(Strange, 1996) along with the spread of technology and lower transport and communication costs have enabled the building of global waste trade networks through toxic waste colonialism. Toxic waste colonialism is a phenomenon wherein waste from industrialized economies is transported to emerging regions as a cheap option for disposal or recycling.

Over the last quarter of the 20th century, the global output of toxic waste has risen significantly at the global level, creating a range of global issues. Also the some regulations and increased waste management costs have led waste producers in industrialized countries to pursue sending abroad cheaper because it has a lower cost(European Environment Agency, 2012, 20-24).

With the spread of war, anarchy, poverty and terrorism around the world, particularly in the Middle East, value transfer — often done informally through the waste trade and hawala method — has become more important.

Understanding the ties between the toxic colonialism and money laundering, as well as the role of third-party actors has paramount importance if we are to understand the true nature and complexity of global money laundering relations. This paper is intended to help to explain the ties involved in the waste trade between developed and emerging or undeveloped countries. It is clear that global economic ties have decided to flow of waste from rich to poor countries. Economic globalization has increased and supported the waste transfer for recycling and disposal to developing countries in need of foreign exchange.

However, the impact of these waste trade network can adversely affect beyond the environment money laundering relations and economic security over the longer term. As money moves outside traditional financial institutions, it is not taxed and has the potential to impact government revenues and the balance of supply and demand in foreign currencies. Also, with the advances in transport, finance and communications that have

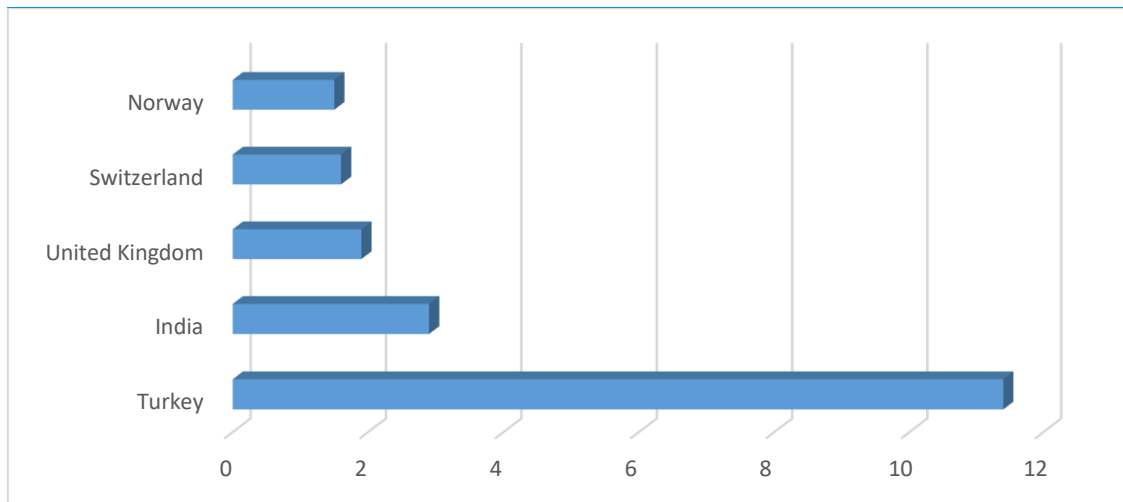
resulted from globalization process, transnational organized crime organizations are able to develop better networks needed to optimize their profits(Agnew, 2018: 258). More dramatically, globalization has provided effective management in transnational illegal activities; it has allowed these organizations to classify, monitor and regulate their value transfer and revenue, which is very important for their work nature.

The most noticeable negative effect of the waste trade market on emerging or underdeveloped economies could be seen in its contribution to fostering the smuggling of funds for illegal transactions and purposes, such as arms trafficking and the smuggling of antiques and oil. Economically, the growth of the waste trading market is disruptive to production-based business practices, as it encourages non-productive commercial and financial services, creates a network of powerful intermediaries generating significant economic benefits through the smuggling of cash abroad, and diverts investment away from productive sectors.

Developed economies are sending their waste to emerging or undeveloped regions for recycling or disposal instead of disposing of it themselves, making large payments to waste trade companies in underdeveloped countries. As a result, waste traders are able to move value inside the waste from industrialized countries to underdeveloped regions with the help of toxic colonialism.

In this sense, the value is typically transferred from Europe to other countries through waste trade network. According to Eurostat data(EUROSTAT, 2020); the EU waste exports increased and imports have fallen in long term. Turkey and China were the main destinations for the EU's waste until 2018 China's ban(Semuels, 5 March 2019) on the import of various types of plastic waste; so, it has fallen suddenly to 1.2 million tonnes in 2019. Also, in 2019 Turkey with a quantity of about 11,4 million tonnes was the main destination for EU waste.

**Table 1. Main Destinations for EU's Waste in 2019 (million tonnes)**



Source: (EUROSTAT, 2020)

The emphasis of this article is on money laundering threats rather than vulnerabilities, and it addresses criminal entities, including organized crime groups specialized in the provision of money laundering services and accomplices who are deliberately negligent, or unintentionally complicit in the process of money laundering using a combination of value transfer systems. In this regard, the goal is to identify the roles and characteristics that characterize the transfer of value through waste trade, namely those persons, organizations and networks involved in the transfer of value to third parties for a fee or to escape fees. Waste trade method service providers are rarely personally involved in the development of criminal activities, as the primary priority is often to facilitate money laundering. The waste trade method could provide the network system for nuanced money laundering or create a unique framework targeted to the special requirements of the customer seeking to reverse launder the dirty money.

### **1. The Waste Trade Method**

Alternative remittance systems are trust-based mechanisms that allow illegal and sometimes unlicensed transfer of money to another geographic area (Vittori, 2011, 45). Organized crime groups are aggressively striving to create more innovative and advanced strategies. On the depth of alternative value transfer systems and money laundering, there are very few empirical results, due to its nature.

Characteristics of alternative value transfer systems are to be blamed; the convenience it offers, the standard of confidentiality and speed (Pohoapã - Caunic, 2007: 4; FATF, 2008,

24). Thus, unregistered transactions in the waste trade method makes it attractive to organized crime groups. In this sense it can be said that waste trade method is special and highly effective for the activities of criminal associations networks.

In theory, waste trade method is very simple. The waste trade method refers to a customary informal channel for transferring funds from one person to another via an independent person. It provides expertise to cover up the ownership, source, origin, location, destination, existence and control of the funds in order in order not to get caught. The waste trade method connects and enables the criminal operations of such organizations and their trafficking in natural resources, guns, narcotics, cash, antiques and etc. This money transfer and laundering structure remains off the radar of the international media as well as national and international law enforcement.

Trade-based money laundering is known as “the process of disguising the proceeds of crime and the transfer of value through the use of trade transactions in an attempt to legitimize their illicit origin”(FATF, 2006, 3). Thus, by using its structure and function outside the regulated financial system, the waste trading method is used to override the regulated financial market and to create a parallel mechanism for transferring and maintaining records of transactions and accounting.

According to Michael Freeman's terrorism financing theory; there are six parameters for terrorist groups: quantity, legitimacy, security, reliability, quantity, simplicity and control (Freeman, 2011, 463-464). Organized crime organizations would attempt to remove the connection between crime and assets and to avoid a correlation between assets and the new owner. They would also tend to use independent sources of funding (Thony, 2002, 3; Williams, 2008, 128).

In this manner, the waste trade method offers a secure source of transfer and funding for valid purposes that is safe and easy to follow for organized crime organizations. The most striking feature of this method is that it needs fewer workers and, in the case of a transfer with a high level of privacy, a value transfer can be made only with one person. In addition, waste trade method offers both domestic and international value transfers in a safe, low cost and quick way, independently on a legal mechanism.

Waste trade networks can survive the prosecution of law enforcement against any of their clients of criminal or organized crime groups. Successful dismantling of the waste trading

process includes a concentrated intelligence collection and inspection of the transfer activities. Providing services to criminals and organized crime organizations, money-launderers using waste trade are criminal organizations that benefit from these money-laundering activities. The volume of the waste trade method is not very widely stated in the literature and cannot be estimated precisely due to the extreme illegal nature of the subject. Nothing can be stated explicitly, but it is expected to be about billions of dollars. The most sophisticated characteristic of the waste trading method is on the background. The idea behind the waste trade approach is very clear. As the simplest and among the first real informal value transfer services ever provided, no one should be surprised by its lack of sophistication. The main problem at stake with the waste trade method is not so much that the archaic financial service still competes with more progressive alternatives, but that it skirts the laws of the state. It is a easy system of value transfer without associated brokers using a variety of means of communication.

According to an Afghan irregular immigrant based in Ayvalık, Balıkesir, Turkey; the waste trade method is based on two interrelated elements: reliability and a network of contacts (Beitollah Zaffarukhan, personal interview, 19 July 2020).

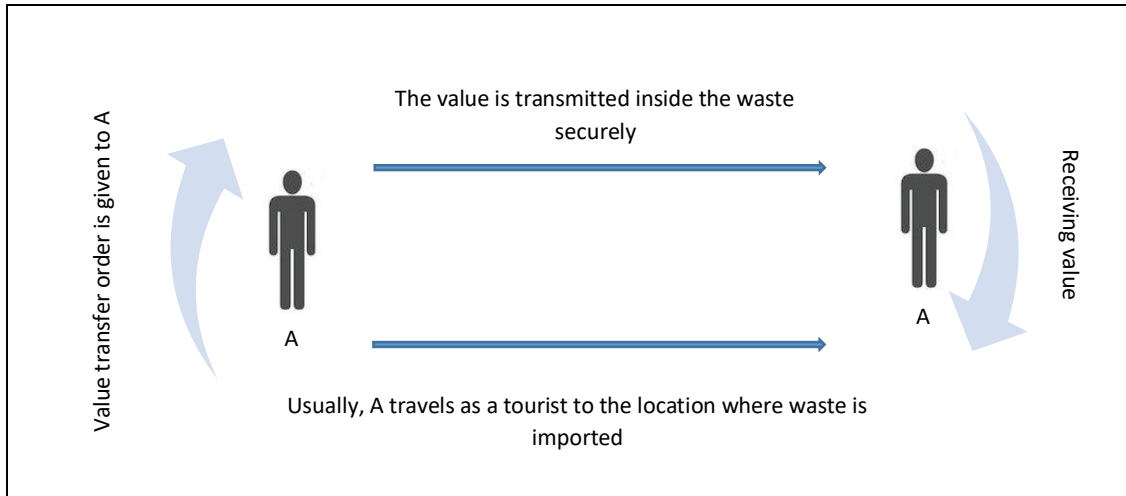
Those who use waste trading method can transfer billions of dollar worth values everywhere. In addition, by collecting legal revenue in return for this waste transaction. In addition, it offers an excellent mechanism for initiating bogus transactions that seem to be legitimate barring extensive investigation. Perhaps that is why the waste trade method is not well recognized among counter-terrorism practitioners.

We can list the reasons why waste trade is preferred as follows;

- Being generally cost-free and getting large payments for the transfer to be made,
- Suitable to be mixed with other alternative value transfer systems like hawala,
- Work with minimum interference from legal authority,
- Being anonymous, flexible and not bureaucratic,
- High transfer and personal security; it is the most convenient, safe, reliable and inexpensive way for value transfer,
- Strict foreign trading arrangements,
- Criminal purposes accepted by criminal networks such as money laundering, terrorism financing, tax evasion.



**Figure 1: Value Transfer Through Waste Trade**



Source: Author's own figure.

### **1.1. The 'Nuts and Bolts' of a Waste Trade Method**

The waste trade method allows criminal groups to participate in a wide variety of illicit activity and maximizes opportunities for organizations to make a profit. Moreover, this method not only provide redundancies in what can be smuggled, trafficked, sold or laundered, but also provide several means of getting illicit goods onto the market. Since value travels with waste trade method around the world on a regular basis, it is anonymous and leaves no audit trail.

Governments have consistently strived to regulate and monitor cash transfers, setting up mechanisms to control them, and collect data about the direction of value flow, especially as informal transfers, known as hawala, expanded. Thus, the waste trade market gained importance due to several factors, including the disruption of the hawala banking system as a result of the expansion of the strict control capacity of state institutions. The waste trade market became more prominent as state regulations increased. It also became coveted due to its low financial, administrative, legal, and time costs.

According to a Somalian irregular immigrant based in Ayvalık, Balıkesir, Turkey; in their case; licensing, regulation attempts and strict controls on hawala forced their hawaladar to use waste trade network, by paying a percentage of their income to waste trading firm (Mmame Hassan, personal interview, 24 July 2020)

The market for waste trade is also seen as promising and lucrative due to the broad and increasing demand for value transfers as a result of the impossibility of follow-up. Generally, the use of the waste trade method was a reflection of the inadequacy of hawala

services and their costs. Inversely, the waste trade method was characterized by a fast speed and almost no expense.

In fact, the waste trade method has some common characteristics with hawala. Both are motivated by the objective of anonymity. And they both use the benefits of globalization. The drawbacks of the hawala system are the risks associated with the value transfer by the sender and they may not have financial ability to give the value to its owner or may make deductions from the sum to be transferred to the recipient. Also, hawala offices are subject to robbery and theft while sending or receiving large sums of money. Hawaladars charge higher fees to those who use the method to circumvent barriers of trade, capital controls, authorities or administrative obstacles. Typically, large quantities of cash are faced with different risks during a hawala transfer, and security risks can be high. On the contrary, transfer through waste trade is a safe way of exchanging value in high-risk countries because only one person knows where the transaction is and there is no loss.

Similar value transfer methods, such as the hawala system; as long as there is a sender with some value for a distant receiver, the trader would possibly be able to locate another trader in areas close to the latter and complete the transaction. For example, hawala, relies heavily on confidence, and it may take time to find someone to give a voucher to another hawaladar with whom he has no previous relationship. And four people are needed in the traditional hawala process; the value sender, the value buyer, and two hawaladars. But there is no need for another trader with the waste trade method.

On the other hand, the most significant feature of the hawala network is the magnitude of the personal relationship between the hawaladars, and the hawaladars communicates by fax, e-mail or phone with the other hawaladar in the city or country of the recipient. This person is usually someone he or she knows from a personal or business network, which means it can be monitored by the governments, and exposes the failure of the hawala system in terms of potential safety risks and the reasons for the existence of waste trade method, and lead to its emergence as a realistic alternative value transfer system.

In contrast to hawala, waste trade method is more rational for criminals. Since organized crime organizations are anxious that any hawaladar would betray or any government official who could identify value traffic would use the hawala system as a client. In addition, the hawaladars are responsible for small units within the organization which is

responsible for its own funding, and the funds given would progress to decentralization and decreased control over these funds, which may end with radicalization.

## **2. The Role of Waste Trade in Money Laundering**

The International Criminal Police Organization (Interpol) described money laundering process as; “*any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources*”(Stamler et al., 2014, 121). And Financial Action Task Force (FATF) described money laundering schemes as (Stamler et al., 2014, 121-122);

*“In the initial—or placement—stage of money laundering, the launderer introduces his illegal profits into the financial system. This might be done by breaking up large amounts of cash into less conspicuous smaller sums that are then deposited directly into a bank account, or by purchasing a series of monetary instruments (checks, money orders, etc.) that are then collected and deposited into accounts at another location.*

*After the funds have entered the financial system, the second—or layering—stage takes place. In this phase, the launderer engages in a series of conversions or movements of the funds to distance them from their source. The funds might be channeled through the purchase and sales of investment instruments, or the launderer might simply wire the funds through a series of accounts at various banks across the globe. This use of widely scattered accounts for laundering is especially prevalent in those jurisdictions that do not cooperate in anti- money laundering investigations. In some instances, the launderer might disguise the transfers as payments for goods or services, thus giving them a legitimate appearance.*

*Having successfully processed his criminal profits through the first two phases the launderer then moves them to the third stage— integration—in which the funds re- enter the legitimate economy. The launderer might choose to invest the funds into real estate, luxury assets, or business ventures.”*

Waste trade method offers efficient placement, layering, and integration. Waste trader can make payments for transactions related to the legitimate business in the costs related to his foreign trade business in order to place the crime income. It is useful to distinguish criminal income from the waste trade system by allowing a transfer with time intervals.

Also, the FATF describes third-party money laundering as money laundering by a person who did not participate in the commission of the correlated crime(FATF, 2019). The key aspect that makes the waste trade method peculiar is the provision of waste trade, in particular, money laundering services in exchange for commission, fee or other form of

benefit. This means that third-party money-launderers are also active in legitimate businesses such as the waste trade. So, we may assume that waste trade is a subset of third-party money laundering. Given that money laundering by waste trade requires third-party laundering, we may claim that they use sophisticated knowledge and expertise to manipulate legal loopholes and allow criminals to conceal and legitimize the proceeds of crime. The waste trade method is used by clients to build a gap between the perpetrators of the crimes and the legitimate revenues they produce as profits. Since criminal clients do have the advantage of money laundering efficiently without the detection of law enforcement.

In general, the organization of the waste trade networks consists of individuals who monitor, manage, collect and distribute illegal funds and who work together as courier to negotiate deals with other organized crime organizations. Criminals that produce large quantities of illicit value also use the services of these international waste trade networks that are capable of obtaining, handing over and distributing dirty money. If an international waste trading network interacts with organized crime organizations operating in various countries, it can easily provide settlement phase for money laundering. Money laundering in the international waste trade network and the criminal value generated in cash involve the physical transport of assets such as bulk cash inside the waste already imported or exported.

Transferring value and laundering funds may be the core activity of the organization, but not necessarily the only activity. “Physical transportation of cash across an international border is one of the oldest and most basic forms of money laundering”(FATF and MENAFATF, 2015, 3). And, as the Europol Financial Intelligence Group has noted, the flow of cash by freight and mail remains a blind spot for law enforcement. It is therefore not surprising that the illegal economy itself is mainly cash-based and that cash couriers have come to play an important role in illegal value transfer. The use of such couriers makes it easier for illegal actors to transfer their money to locations where they have easier access to the placement process(EFIG, 2015, 7, 18-19).

In that sense, we can conclude that the waste trade method makes it easier to move values to pre-determined locations and promote their placement in the financial system. It can be an individual money launderer through waste trade who is specialized in providing money laundering service, which may also be done when acting in a legal profession. Or

for example money laundering organization like waste trading firm, which consists of two or more individuals working as an organized community specializing in the provision of money laundering services to criminals.

They can also serve as informal networks of individuals offering a variety of value transfer or money laundering services to the criminal customers.

Organized crime organizations would also proactively attempt to hire complicit insiders in existing waste trade firms, since these individuals have insider access and may be able to falsify records or facilitate transactions in a manner that bypasses the AML / CFT laws.

There are a multitude ways to move cash across borders and, generally speaking, organized crime groups will make vast sums of payments due to easy move(The Economist, 2016), but through a waste trade method rather than paying, they will obtain extra funding for importing / exporting waste. In that sense, the legal financial resources of organized criminal groups are earnings from the waste trade. If these legal funds are used for obviously illegal activities, they are referred to as "reverse money laundering"(Krieger - Meierrieks, 2011: 16) In this context, if a corporation associated with an organized criminal group imports waste, since, during the import of waste, any transfer of value can be made without being caught in the controls and also receiving a large sum of payment; the waste trade method and mixed use of any other value transfer method with it (hawala etc.), provides a unique environment for reverse money laundering.

### **Conclusion**

In an era of a globalization and toxic waste colonialism, unregulated value transfer through waste trade method can lead a government failure and can affect macroeconomic policy, have an impact on economic security and even higher social costs on emerging economies.

As a result, it is difficult to enforce regulations on waste trade, since the existence of toxic colonialism continues to spread worldwide and is at the forefront of the causes of existence. In addition, we may say that it will continue to be a viable method of transporting funds because of the effective and cost-effective nature of any regulatory environment for waste trade method.

It can be said that progress cannot be made to struggle with waste trade method when we do not understand the complexity, the past, the nature of the system. FATF recommendations on AML focus on key areas such as, detailed review, customer identification, reporting suspicious transactions, record keeping, licensing, checking compliance, sanctions and creating awareness(FATF, 2001: 13) The main goal should be here to encourage local waste trading firms to combat money laundering and terrorism financing. Licensing regimes are more stringent in that waste traders are obliged to demonstrate their ability to comply with comprehensive harmonization and regulation, a clean criminal record, prior management experience, high capital guarantees, and so on. Governments should carry out awareness local waste trade companies and encourage people to report suspicious activity. As a deterrent source, appropriate sanctions should be applied to these locale waste trade companies in case of non-cooperation.

The waste trading method has remained popular because it generally costs nothing, rather it generates income and poses almost no risk. Although policies and strategies aimed at preventing the abuse of waste trade network that will be shaped around the theory of money laundering can yield effective results in the short term, crime organizations will be the winner in the long term. Government financial institutions may use the methods developed within the framework of the fight against money laundering, but these methods may be insufficient against obtained revenues through reverse money laundering as in the waste trade.

Hence, the most beneficial options in the near term are restricting, controlling or prohibiting the local waste trade market. For instance, waste plastic trade is prohibited in China since 2018. However, the risk of funding the organized criminal organizations in the neighboring countries where the banking system has not developed sufficiently is still a risk.

In the context of waste trade, in the long term, the distorted economic relationships create constituencies with an interest in perpetuating value transfer for illegal purposes. Ending conflict and establishing durable peace therefore requires, in this view, the replacement of toxic colonialism with economic relationships that promote peaceful stability.

As a matter of fact, criminal organizations have a trend of renewing themselves with the constantly evolving environment. It can also be concluded that, in general, criminal organizations will be vigilant in the confrontation against terrorism financing and money

laundering activities of government institutions in all respects, that they can make assumptions about existing policies, take action against them and apply new methods of funding. Therefore, it can be assumed that, in general, criminal organizations will be proactive in the fight against terrorism financing and money laundering activities in all aspects, that they will make predictions on current strategies, take measures against this and apply different financing methods. Under this assumption, it can be argued that the strategies that can be developed at the point of eliminating the main causes of terrorism will be efficient in the long run and perhaps the best sustainable strategy.

This sort of mixing of legitimate and illegitimate businesses potentially ties law-abiding traders to criminals unnecessarily. Thus, waste trade should be avoided in the interests of innocent traders themselves. Thus, would blunt the criminal elements within the industry that has led it being a value transfer system built for terrorism that works in secrecy.

Toxic waste colonialism has made waste trade much more competitive, but also has shown that current regulation paradigm is not enough. The Basel Convention (United Nations Environment Program, 1992) which was adopted regarding the control of transboundary transport and disposal of toxic wastes could not decrease transnational trading volume and the attendant money laundering issues. Many countries cannot sufficiently investigate and prosecute third-party money laundering.

It is important to consider potential remedies capable of fixing key problems affecting the toxic waste colonialism. Waste trade method is required to familiarize itself with potential risks it faces in terms of money laundering and create a set of policies and procedures to limit the abuse of their services by criminals and then to produce a written plan of action. This can include asking questions and investigating about the source and destination of the funds, profiling clients based on the backgrounds depending on the circumstances.

On the other hand, on international perspective given the sui generis nature of value transfer method such as waste trade, it is simply not realistic to expect conformity. Theory might suggest this result is counterintuitive, but rather than relying on the law as a cudgel to compel obedience, to ending toxic waste colonialism and banning international waste trade like China, would better serve the interests of both traders and the governments in combatting organized crime. This may also prove to be a valuable technique for preventing, controlling and compensating toxic waste colonialism.

The existence of legal gaps and uncontrolled areas can promote exchanges between international waste trade companies. Sustainable and flexible regulatory waste trade strategies, along with short-term imperatives, should not disregard the economic and political distinctions that have contributed to make waste trade a conduit for organized criminal groups. Accordingly, as long as these structural factors are not taken into consideration, the regulation of the waste trade system cannot be done efficiently in the long run. At the same time, international efforts need to complement each other.

Global waste management needs to be reassessed in the light of the relationship between money laundering and updated to better solve this issue. Future discussions on global waste trade need to concentrate on ways to enable developing nations to avoid land terrorism financing and money laundering risks, not just from outside their territories but also from within their borders.

The financing needs of organized crime organizations will never end. For this reason, even if efforts are made to prevent the financing of terrorist organizations, they will be looking for new methods; by analyzing the possible methods well; the government systems must be designed accordingly for successful prevention. By analyzing all kinds of money flows, it is important to determine whether there is a possibility of abuse.



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