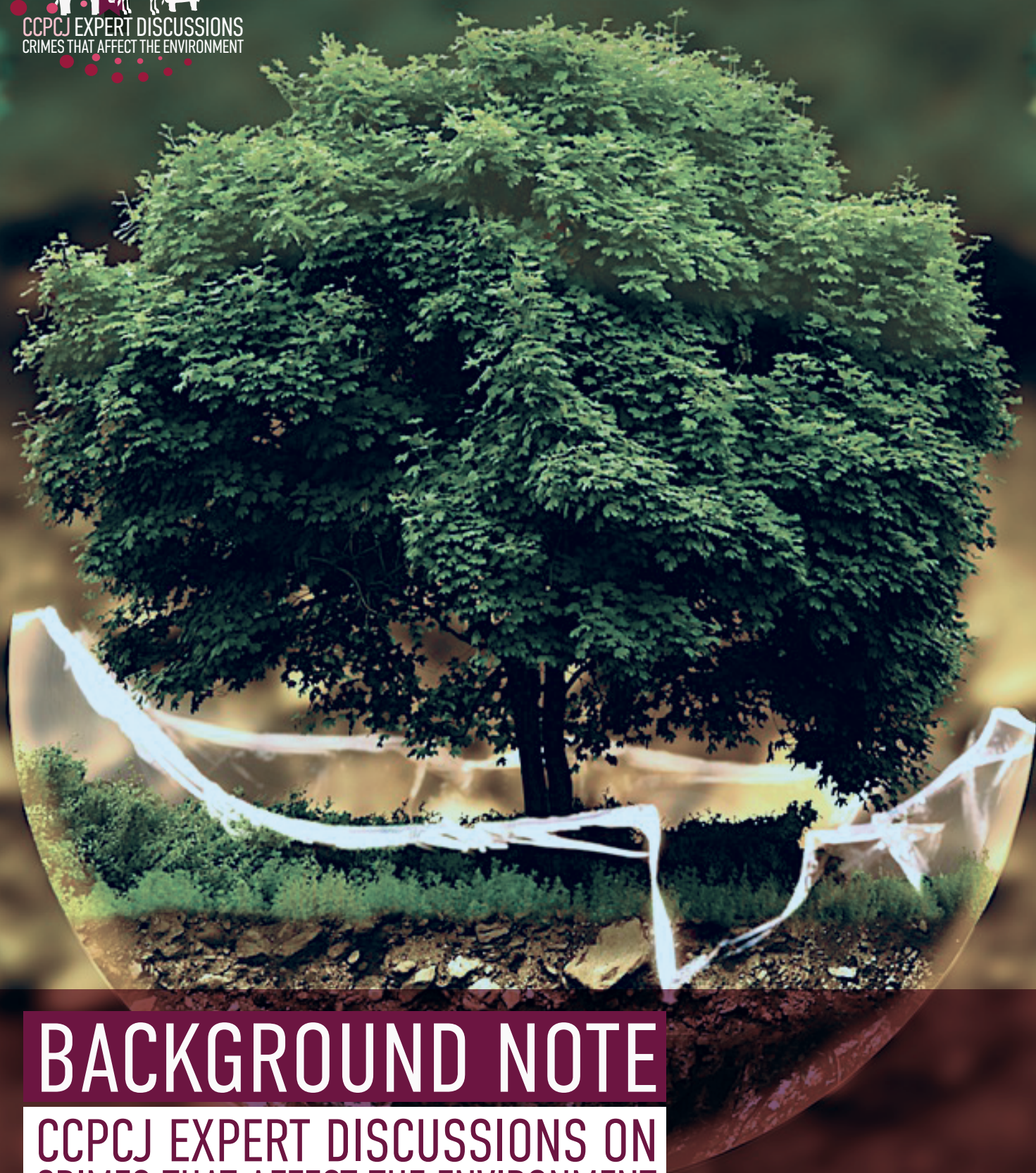




CCPCJ EXPERT DISCUSSIONS  
CRIMES THAT AFFECT THE ENVIRONMENT



# BACKGROUND NOTE

CCPCJ EXPERT DISCUSSIONS ON  
CRIMES THAT AFFECT THE ENVIRONMENT

14-16 FEBRUARY 2022

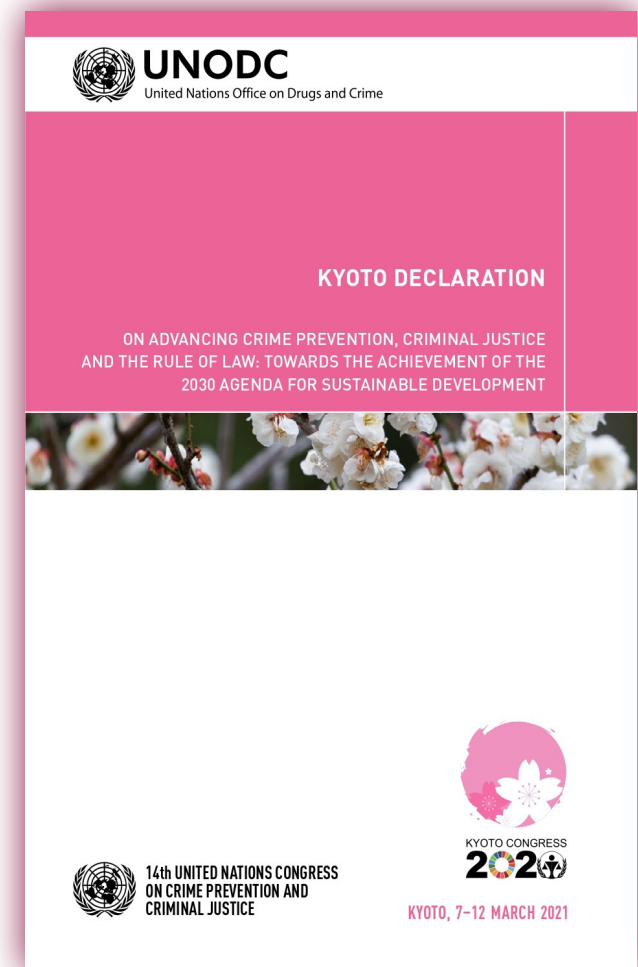
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## Background Information

On 7 March 2021, the Fourteenth United Nations Congress on Crime Prevention and Criminal Justice adopted by consensus the Kyoto Declaration on Advancing crime prevention, criminal justice and the rule of law: Towards the achievement of the 2030 agenda for sustainable development<sup>1</sup>, calling upon the Commission on Crime Prevention and Criminal Justice (CCPCJ) to adopt the appropriate policy and operational measures for the follow-up to the declaration and to identify innovative ways to make use of information on progress made in the implementation of the declaration. The Commission approved the Kyoto Declaration during its thirtieth session in May 2021 and recommended its endorsement through the Economic and Social Council (ECOSOC) to the General Assembly. Operative paragraph 87 of the Kyoto declaration refers to the commitment of Member States to adopt effective measures to prevent and combat crimes that affect the environment, such as illicit trafficking in wildlife, including, inter alia, flora and fauna as protected by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), in timber and timber products, in hazardous wastes and other wastes and in precious metals, stones and other minerals, as well as, inter alia, poaching.<sup>2</sup>

During the thirtieth session in May 2021, the CCPCJ approved the resolution, entitled “Preventing and combating crimes that affect the environment”<sup>3</sup>, which has meanwhile been adopted by the Third Committee of the General Assembly. The resolution welcomed the Kyoto Declaration, reaffirmed the central role of the CCPCJ as the main policymaking body of the United Nations in the field of crime prevention and criminal justice, and reiterated the call made in the Kyoto Declaration to adopt the appropriate policy and operational measures for the follow-up to the Declaration. Operative paragraph 15 of the resolution called upon the CCPCJ to hold, during the intersessional period, expert discussions on preventing and combating



crimes that affect the environment with a view to discussing concrete ways to improve strategies and responses to effectively prevent and combat these crimes and to strengthen international cooperation at the operational level on this matter.<sup>4</sup>

The expert discussions are scheduled as follows:

- (a) 14 February 2022 - Preventing crimes that affect the environment
- (b) 15 February 2022 - Combating crimes that affect the environment
- (c) 16 February 2022 - Strengthening international cooperation to address crimes that affect the environment

Environmental issues are dealt with in different intergovernmental fora, including the conferences of the parties to numerous multilateral environmental agreements, and are addressed by various international

organizations. The CCPCJ focuses on the aspects falling within its specific mandate, namely crime prevention and criminal justice. The expert discussions aim to raise awareness for crimes that affect the environment, particularly for the elements highlighted in the resolution, as well as to bring together the relevant stakeholders to share their expertise, with the CCPCJ acting as the convening forum for dialogue.

For the work of intergovernmental bodies on the specific crime-related issue of the application of the United Nations Convention against Transnational Organized Crime in the field of preventing and combating transnational organized crimes that affect the environment, see below.

The present background note by the Secretariat, while not comprehensively addressing all aspects of crimes that affect the environment, has been prepared to facilitate dialogue and an active exchange during the Commission's expert discussions. The background note draws upon, among others, reports of the United Nations Office on Drugs and Crime (UNODC), other UN entities, international and regional organizations, including but not limited to the United Nations Environment Programme (UNEP), the United Nations Interregional Crime and Justice Research Institute (UNICRI), the International Criminal Police Organization (INTERPOL), the World Customs Organization (WCO), the World Bank and the Secretariats of multilateral environmental conventions and agreements.

### Structure of the Background Note

The background note is structured along the three main themes under discussion, with a view to providing food for thought regarding elements participants could address during the respective sessions. The background note also includes a set of discussion questions for each of these three themes.

1

#### **Thematic session 1:** Preventing crimes that affect the environment (14 February 2022)

When discussing the prevention of crimes that affect the environment, participants may wish to discuss elements such as the root causes of crimes that affect the environment; the importance of, and good practices in, raising awareness and reducing the demand; as well as the need to enhance the integrity of legal supply chains; and address linkages with other forms of crime.

2

#### **Thematic session 2:** Combating crimes that affect the environment (15 February 2022)

When addressing efforts to combat crimes that affect the environment, participants may wish to, among others, discuss the different *modus operandi* of criminals involved in crimes that affect the environment, and share good practices in detecting, investigating and prosecuting crimes that affect the environment. In addition, participants may wish to share good practices and challenges in addressing corruption and economic crimes, particularly the illicit financial flows derived from crimes that affect the environment and the confiscation of the proceeds of crimes, as well as other considerations, including related to victim and witness protection or compensation for damage caused.

3

#### **Thematic session 3:** Strengthening international cooperation to address crimes that affect the environment (16 February 2022)

When discussing international cooperation to address crimes that affect the environment, participants may wish to discuss how the international community can make the best use of existing international instruments and strengthen regional and international cooperation among Member States, including through cooperation networks. In addition, participants may wish to discuss efforts to strengthen and expand technical assistance and capacity building to enhance inter-agency cooperation and coordination.



In addition to the expert discussions in the framework of the CCPCJ, a number of other intergovernmental meetings organized by UNODC focus on crimes that affect the environment. For example, in line with resolution 10/6 of the Conference of the Parties to the United Nations Convention against Transnational Organized Crime (COP-UNTOC), two working groups of the Conference, namely the Working Group of Government Experts on Technical Assistance and the Working Group on International Cooperation, will hold a joint thematic discussion on the application of the United Nations Convention against Transnational Organized Crime for preventing and combating transnational organized crimes that affect the environment in the week of 23 May 2022, the week following the 31<sup>st</sup> session of the CCPCJ. In this joint thematic discussion, the working groups of the COP-UNTOC will focus more specifically on issues relating to criminalization and international cooperation, with a focus on the pertinent provisions of the UNTOC.



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# Introduction to Crimes that Affect the Environment

**“Our environment and our planet are critical global commons that must be protected for all people, now and in the future” .**

**Secretary-General Report 2021 “Our Common Agenda”**

In the report “Our Common Agenda”, the UN Secretary-General underscored that addressing risks to our planet needs to be part of every decision, every policy, every investment, and every budget.<sup>5</sup> Crimes that affect the environment are among the most profitable crimes with manifold negative impacts, including on sustainable development, the rule of law and good governance.<sup>6</sup> Crimes that affect the environment present a challenge to the international community’s efforts to attain

the 2030 Agenda for Sustainable Development, directly impacting the achievement of several of the seventeen Sustainable Development Goals, including those related to the Food–Water–Health Nexus (SDGs 2, 3 and 6), energy and climate (SDGs 7 and 13), poverty and inequality (SDGs 1 and 10), environmental conservation (SDGs 14 and 15), as well as effective, accountable, and inclusive institutions at all levels (SDG 16).



## **Box 1: UNODC’s Global Programme for Combating Wildlife and Forest Crime and the SDGs**

UNODC’s efforts to address wildlife crime directly contribute to the achievement of SDGs 3, 13, 14, 15 and 16. Protecting fauna and flora is a crucial component to mitigate the risks posed by zoonotic diseases, contributing to SDG 3 focused on good health and well-being. Efforts to achieve the targets of SDG 13 on climate action are also directly linked to addressing wildlife crime, as these crimes drive deforestation and the loss of multiple species of wild fauna and flora and marine resources, affecting whole ecosystems and contributing to climate change. UNODC’s efforts to address unlawful activities that threaten the health of the oceans, such as serious offences committed along the fisheries value chain, support the achievement of SDG 14 focused on life below water. In addressing trafficking and transnational organized crimes that affect the environment, UNODC’s Global Programme for Combating Wildlife and Forest Crime contributes to the attainment of SDG 15, in particular target 15.7 on taking urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products. With the recognition that effective and accountable justice systems are key to upholding the rule of law, UNODC’s efforts to support Member States in improving the effectiveness of criminal justice systems to address crimes that affect the environment and to prevent and counter corruption that facilitates such crimes, are directly linked to the achievement of SDG 16, ensuring peace, justice, and strong institutions.<sup>7</sup>



Crimes that affect the environment include a wide range of illegal activities committed by different perpetrators, ranging from individuals to companies and transnational organized criminal groups. Such crimes are not committed in isolation but are increasingly interlinked with other forms of organized crime, representing a lucrative component in the criminal portfolio of transnational organized criminal groups. To commit wildlife crime, organized criminal groups tend to use the same trafficking routes and modus operandi as they do for other illicit commodities.<sup>8</sup> Crimes that affect the environment are also linked to other forms of serious crimes.

While there is no commonly accepted definition of crimes that affect the environment, numerous discussions and resolutions in the United Nations system have recognized these crimes as a growing threat to peace and sustainable development. Addressed are crimes ranging from illicit trafficking in wildlife, wildlife parts and/or their derivatives, in timber and timber products, in hazardous wastes and other wastes and in precious metals, to poaching, illegal logging, or mining. UNEP and INTERPOL offer a broad description in the absence of a universally agreed definition of the terminology “environmental crime”, namely as “a collective term to describe illegal activities harming the environment and aimed at benefiting individuals or groups or companies from the exploitation of, damage to, trade or theft of natural resources, including, but not limited to serious crime and transnational organized crime”.<sup>9</sup>

Crimes that affect the environment are complex and have been the focus of resolutions adopted by the General Assembly, the ECOSOC, the CCPCJ, as well as other intergovernmental fora such as the Conference of the States Parties to the United Nations Convention against Corruption (COSP-UNCAC), and the Conference of Parties to the United Nations Convention against Transnational Organized Crime (COP-UNTOC).

At its 22nd regular session in 2013, the CCPCJ held its annual thematic discussion on the topic “the challenge posed by emerging forms of crime that have a significant impact on the environment and ways to deal with it effectively”, pursuant to the ECOSOC decision 2010/243.

The CCPCJ first addressed the issue of crimes that affect the environment during its third session in 1994 and recommended for adoption by the Economic and Social Council a draft resolution on the role of criminal law in the protection of the environment. In resolution 1994/15, the Council urged Member States to consider acknowledging the most serious forms of environmental crimes in an international convention.<sup>10</sup>

The consideration by the CCPCJ follows the attention given to crimes that affect the environment by the United Nations Crime Congresses, for which the CCPCJ not only acts as the preparatory body but also as the follow-up body. Crimes that affect the environment have been addressed in various outcome documents of the United Nations Congresses on Crime Prevention and Criminal Justice (Crime Congress) that have been held over the course of the last 65 years. Crimes that affect the environment have been discussed during the Eighth Congress held in 1990 in Havana, Cuba, and a resolution, entitled “the role of criminal law in the protection of nature and the environment”, was adopted by the Crime Congress at that time.<sup>11</sup> The Ninth Congress, held in 1995 in Cairo, Egypt, was the first to examine the issue of environmental crime in-depth and also touched upon issues as crimes against cultural heritage, the illegal disposal of and trafficking in hazardous wastes, and illegal trafficking in wild and endangered species, which would be taken up at several subsequent UN Crime Congresses and sessions of the UN Crime Commission.<sup>12</sup> Crimes that affect the environment also found prominent mention in the 2010 Salvador Declaration on Comprehensive Strategies for Global Challenges: Crime Prevention and Criminal Justice Systems and Their Development in a Changing World. In the outcome document of the Twelfth Crime Congress, the challenge posed by emerging forms of crime that have a significant impact on the environment was highlighted and the CCPCJ was invited to study, in coordination with the relevant United Nations bodies, the nature of the challenge and ways to deal with it effectively.<sup>13</sup> With the 2015 Doha Declaration on integrating crime prevention and criminal justice into the wider United Nations agenda to address social and economic challenges and to promote the rule of law at the national and international levels,



and public participation, the outcome of the Thirteenth Crime Congress, Member States committed to strengthening legislation, international cooperation, capacity-building, criminal justice responses and law enforcement efforts aimed at, inter alia, dealing with transnational organized crime, corruption and money-laundering linked to crimes that affect the environment.<sup>14</sup> Most recently, in the outcome of the Fourteenth Crime Congress, namely the 2021 Kyoto Declaration, Member States expressed deep concern about the negative impact of crime on the environment and committed to adopting effective measures to prevent and combat crimes that affect the environment. For more information on the outcome documents of the Crime Congresses, kindly visit: <https://www.unodc.org/congress/en/previous-congresses.html>.





# Day 1: Preventing Crimes that Affect the Environment

## Root Causes and Drivers

In the Kyoto Declaration, Member States committed to developing, implementing, and evaluating crime prevention strategies, including their effectiveness, that address the causes, including the root causes, and risk factors that make different segments of society more vulnerable to crime.<sup>15</sup> Preventing crime requires an understanding of its causes. The root causes and drivers of crimes that affect the environment include a variety of factors that need to be taken into consideration when designing, implementing, and evaluating responses. With the most common crimes that affect the environment connected with the unlawful exploitation of fauna and flora, pollution or waste disposal, these crimes are often considered to be low-risk and highly profitable, a fact that has also not gone unnoticed among organized criminal groups.<sup>16</sup> A growing demand for natural products, coupled with a poor understanding of the impact on the environment

can be considered as drivers for such crimes.<sup>17</sup> In addition, conspicuous consumption can be observed, particularly for ivory and rhino horn used for decorative and traditional medicinal purposes in some regions.<sup>18</sup> Also, poverty can be considered a driver for such crimes, facilitating the recruitment of low-level perpetrators on the frontlines, for example, in the case of illegal poaching. According to the UNODC World Wildlife Report 2020<sup>19</sup>, the root causes of crimes that affect the environment include among others poor governance and widespread corruption, minimal budgets to police, prosecution and courts, and very low volume of proceeds from sustainable and managed use of natural resources going back into communities. The role of conservancies and tourism operations could also be discussed, focused on the responsibility to ensure that local communities benefit from such operations.

## Demand Reduction and Awareness Raising

With crimes that affect the environment on the rise, it is important to implement effective crime prevention and demand reduction strategies, including addressing elements such as poverty reduction, providing legal income opportunities, as well as implementing awareness-raising strategies on the impact of crimes that affect the environment.<sup>20</sup> In General Assembly resolution 69/314, Member States were urged to engage actively in efforts to raise awareness about and address the problems and risks associated with the supply and transit of, and demand for, illegal wildlife products, and to reduce the demand using targeted strategies

in order to influence consumer behavior.<sup>21</sup> The General Assembly adopted resolution 68/205, designating 3 March as World Wildlife Day, and invited all Member States, organizations of the United Nations system and other global, regional and subregional organizations, as well as other relevant stakeholders, including civil society, non-governmental organizations and individuals, to observe and raise awareness for World Wildlife Day in an appropriate manner, in accordance with national priorities.<sup>22</sup> Numerous awareness-raising campaigns have been launched since the adoption of the resolution.



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### Box 2: World Wildlife Day 2020

The theme of World Wildlife Day 2020, “Sustaining all life on Earth”, encompassed all wild animal and plant species as a component of biodiversity and shined a light on the livelihoods of people, especially those who live closest to nature.<sup>23</sup> One of the World Wildlife Day activities was co-organized with Jackson Wild and featured a film showcase<sup>24</sup> based on the theme. Attracting nearly 350 entries, the competition saw a wide array of filmmakers with a passion for wildlife bring to the screen some gripping stories centered on biodiversity and the interaction between people and wildlife.<sup>25</sup> Another artistic highlight was the second international World Wildlife Day youth art contest<sup>26</sup>, calling on school-age and youth artists to illustrate the day’s theme through their art.<sup>27</sup>

During that day, UNODC organized together with UNRIC a screening of Richard Ladkani’s award-winning documentary ‘Sea of Shadows’ in Brussels, together with Member of European Parliament Grace O’Sullivan and the director of the film himself.<sup>28</sup>

In addition, States, organizations, and civil society groups celebrated the day through their own events around the world. Photographic competitions in Accra, Ghana; a symposium in Bhopal, India; a forum on crocodile conservation in the Philippines; reforestation days in Nicaragua; giant billboards promoting World Wildlife Day across the United States; and the lighting of the Empire State Building in New York, all together honored the day.<sup>29</sup>

The International Consortium on Combating Wildlife Crime (ICCWC) works to raise awareness of the seriousness of wildlife crime, sharing knowledge, research, and good practices with stakeholders to prevent and combat such crimes. For example, in West and Central Africa, ICCWC supported Member States to better understand the threats of wildlife crime by undertaking the West and Central Africa Wildlife Crime Threat Assessment. More than 30 agencies have been made aware of the Threat Assessment’s key findings and recommendations and were encouraged to incorporate these into their own working programmes.<sup>30</sup> According to the Secretariat of Convention on Biological Diversity (CBD), the lack of public awareness on the importance of biodiversity is considered as one of the most serious barriers to achieving the objectives of the Convention and other biodiversity-related conventions.<sup>31</sup> A number

of initiatives have been implemented to raise awareness in this field, such as the CBD’s Communication, Education and Public Awareness Programme,<sup>32</sup> the establishment of the United Nations Decade on Biodiversity,<sup>33</sup> or the International Day for Biodiversity.<sup>34</sup>

In an effort to enhance demand reduction strategies for crimes that affect the environment, the Conference of the Parties to CITES highlighted in its resolution Conf 17.4 the need for well-targeted, evidence-based, species-specific demand reduction campaigns to more effectively bring about behavior changes.<sup>35</sup> In the Draft Guidance for CITES Parties to Develop and Implement Demand Reduction Strategies to Combat Illegal Trade in CITES-listed Species of 2021, a five-step process to demand reduction for crimes that affect the environment was introduced.<sup>36</sup>



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### Enhancing the Integrity of Legal Supply Chains

Another challenge in preventing crimes that affect the environment is that illicit markets are often intertwined with legal supply chains. According to a report by the Financial Action Task Force (FATF) of 2021, criminals frequently mix legal and illegal goods early in the resource supply chains to conceal their illicit source (e.g., mixing illegal logs, precious metals and stones, and waste products with their legal counterparts).<sup>37</sup> Protecting the legitimate supply chain, especially from the infiltration of organized crime, is a complex issue that requires a multi-faceted response.<sup>38</sup> UNICRI underscored the importance of identifying the threats to the supply chain of different products and of understanding that certain categories of products may present unique issues in terms of supply chain complexity, product authentication and vulnerability to criminal operations.<sup>39</sup>

#### Box 3: Wildlife Crime

UNODC, in its 2020 World Wildlife Crime Report, stressed the importance of collecting information on the linkages between licit and illicit trade with a view to targeting interventions and responses to specifically address the vulnerabilities of the licit trade and to strengthen the global regulatory system. In studying different case studies, UNODC found that in some cases, the markets are entirely illegal, while in other cases, a large share of the illegally acquired wildlife is processed and sold in a legal market, which allows criminals to access a larger market and broader pool of potential buyers.<sup>40</sup> UNODC in its World Wildlife Report 2020 recommended for example that DNA tests could be used at various points in the supply chain to ensure that species are accurately declared. Regular audits could also be conducted to monitor sources of supply, and there are clear benefits to reducing the gaps in collaboration between actors at all stages of the supply chain, including the private sector.<sup>41</sup> Another example of the opportunities offered by new technologies is the automation of CITES permit procedures and electronic information exchange for improved control of international trade in endangered species (eCITES), which aims to help government agencies to better target their inspections and identify criminal actors.<sup>42,43</sup>

#### Box 4: Precious Metals

The ECOSOC resolution 2019/23, negotiated by the CCPCJ, recognized that the vulnerability of the supply chain facilitated illicit trafficking in precious metals and contributed to the creation of a significant revenue base for organized criminal groups, thereby potentially contributing to the expansion of the criminal enterprise, facilitating corruption, and undermining the rule of law through corruption.<sup>44</sup> UNICRI in 2016 focused on assessing the vulnerabilities of the precious metals supply chain, highlighting the involvement of transnational organized crime and presenting other criminal activities associated with the illicit trafficking in precious metals.<sup>45</sup> The report identified concrete gaps, including jurisdictional loopholes along the supply chain, general supply chain weaknesses, gaps in law enforcement capacity, a lack of information-sharing amongst national agencies and international organizations, and lack of knowledge and training.<sup>46</sup> Supply chain integrity could benefit from making some parts of the trade transaction process electronic, thereby reducing opportunities for corruption, which may also include exploring new technologies like blockchain.<sup>47</sup> In May 2021, UNICRI published the report “Technology and Security: Countering Criminal Infiltrations in the Legitimate Supply Chain”, analyzing how technology can improve the security of the supply chain in five areas, namely: food frauds; illegal unreported and unregulated fishing, illicit pesticides; trafficking in precious metals and fuel frauds.<sup>48</sup>



### Linkages between Crimes that Affect the Environment and Other Forms of Crimes

Crimes that affect the environment are often treated in isolation from efforts to address other types of crime. At the national level, this can be reflected, among others, in the separation of agencies responsible for the protection and conservation of the environment and crimes that affect them, from law enforcement agencies.<sup>49</sup> For example, in relation to wildlife crimes, UNODC found in its World Wildlife Crime Report 2020 that the means of transportation, the routes used, as well as the concealment methods and the logistics involved, are often interlinked with other forms of organized crime.<sup>50</sup> In its report “Convergence of wildlife crime with other forms of organised crime”, the Wildlife Justice Commission suggested that intelligence analysis and analytical techniques such as organised crime group mapping, crime pattern analysis, flow of commodities, and more, would provide greater insight of where and how wildlife crime may be converging with other crimes.<sup>51</sup> In addition, the case studies conducted found that criminal groups may have different motivations

to diversify their activities and engage in wildlife and other types of crime.<sup>52</sup>

According to a survey conducted by INTERPOL in 2015, new crimes or new modus operandi were reported by 60% of respondent countries, indicating growing sophistication and adaptation by transnational organized crime groups. 84% of the respondent countries reported a convergence between crimes that affect the environment and other serious crimes. Among such crimes, corruption was accounted for the largest percentage, followed by counterfeiting, drug trafficking, cybercrime, and financial crimes.<sup>53</sup> INTERPOL’s report “Uncovering the Risks of Corruption in the Forestry Sector” observed that bribery was reported as the most common form of corruption in the forestry sector, followed by fraud, abuse of office, extortion, cronyism and nepotism.<sup>54</sup> For example, criminal networks use corruption and the bribery of officials to establish “safe passage” for the illegal movement of timber.<sup>55</sup>



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### Box 5: Corruption

The management of natural resources is often governed by complex regulations that may be vulnerable to acts of corruption. Incentives to corrupt behaviour could be the high profit and low risk of being caught, together with the absence of effective sanctions. In addition, lack of transparency in the public administration and other agencies, unclear accountability structures or a lack of public disclosure of key documents can be considered conducive to corruption.<sup>56</sup> Chapter II of UNCAC on preventive measures sets global standards on corruption prevention. The full and effective implementation of these general standards also contributes to the prevention of corruption that specifically enables crimes that affect the environment. Lessons and trends can be drawn from the ongoing review of the implementation of Chapter II of the Convention. More specifically, in addressing the links between corruption and crimes that affect the environment, the Conference of the States Parties to the UNCAC, adopted at its eighth session in 2019 resolution 8/12, entitled “Preventing and combating corruption as it relates to crimes that have an impact on the environment”, calling upon States parties to strengthen anti-corruption frameworks, and promote ethical practices, integrity and transparency, and to endeavour to prevent conflicts of interest, with the aim of preventing corruption as it relates to crimes that have an impact on the environment.



Photo Credit: Pixabay Shutterbug75

### Box 6: Cultivation and Processing of Controlled Substances

The environmental impacts of illicit cultivation and processing of controlled substances have been studied and monitored by UNODC, including through its Illicit Crop Monitoring Programme. UNODC analyzed, for example in its report “Coca Cultivation in the Andean Region A Survey of Bolivia, Colombia and Peru” the impacts of coca cultivation on forests, rivers, and underground, as well as on protected areas and biodiversity in the region,<sup>57</sup> and found that the most obvious environmental effect of coca and opium poppy cultivation was deforestation, some of which attributable to illicit crop-cultivation.<sup>58</sup> The deforestation caused by illicit crop-cultivation is not limited to the area planted with illicitly cultivated plants, as the forest is also cleared for housing, and for example, for airstrips.<sup>59</sup>



### Box 7: Human Trafficking

Crimes that affect the environment are also closely intertwined with trafficking in persons. The International Labour Organization (ILO) examined forced labour and human trafficking in the fisheries sector. In the report “Caught at sea – Forced Labour and Trafficking in Fisheries”, ILO observed that labour and human trafficking take place on board fishing vessels because of the isolation of the workplace, strong competition within the industry and the ready supply of vulnerable workers.<sup>60</sup> INTERPOL further found that in light of the difficult working conditions of illegal mining, miners often tend to be illegal migrants, who were smuggled into the country and who entered the circle of slavery, sexual exploitation, and forced labour.<sup>61</sup>

## Data Collection

In the absence of a common definition and comprehensive approach that account for the different forms of crimes that affect the environment, knowledge about the drivers, the dynamics and the impact of these crimes remains scarce. Reliable information is needed to support a comprehensive approach to combating crimes that affect the environment, as there is still much that is unknown about the activities, their linkages to other crime categories, and the impacts. Data on environmental crimes are collected only when a clear and separate definition of the legal offence exists in national criminal law. In many countries, for instance, actions that have a significant negative impact on the environment fall primarily under administrative offences or environmental or health

regulations and are therefore not reflected in crime statistics. Even where a clear definition exists, data on police-recorded crimes generally represent only those crimes that are brought to the attention of the authorities.<sup>62</sup> To better understand wildlife crime, for example, UNODC introduced the World Wildlife Seizure database (WorldWISE), a global database of seizure incidents. Being partners in the International Consortium on Combating Wildlife Crime (ICWC), UNODC’s World WISE database also profits from the wildlife seizure data reported through the Annual and Biennial Reports submitted by CITES parties, and the WCO-CEN database from the World Customs Organization.

## Discussion Questions

1

What forms of crime that affect the environment are being observed, reported and/or addressed in your country? What are the root causes for the different forms of crime that affect the environment in your country? What are the main drivers for such crimes in your country?

2

Which preventive measures, such as awareness-raising campaigns and demand reduction strategies, have been implemented in your country? What are the benefits of such preventive measures? What are some good practices you can share? How do you measure the impact of such campaigns and strategies?

3

What mechanisms have been put in place to prevent crimes that affect the environment through enhancing the integrity of legal supply chains in your country? What are the advantages for and challenges in implementing such mechanisms?

4

What linkages between crimes that affect the environment and other forms of crime have you observed at the national level? How do you ensure that crimes that affect the environment are not addressed in isolation?

5

What kind of data and information gathering exist to measure the prevalence of crimes that affect the environment in your country? Are those data disaggregated according to certain categories? How can data collection be improved at the international level? How can crime statistics be used to understand patterns, profiles of perpetrators, crimes, and trends?

## Day 2: Combating Crimes that Affect the Environment

### Staying One Step Ahead - Understanding the Modus Operandi and Developing Holistic Responses

Crimes that affect the environment do not stop at borders, and therefore demand reduction and prevention strategies need to be supplemented by coordinated efforts at the national, regional, and global levels to combat the scale and sophistication of criminal activity that harms the environment. Combating these crimes requires a holistic approach across the criminal justice chain, a better understanding of how these criminals operate, and a strong political commitment to work collectively, including through the sharing

of information and intelligence. In turn, this will allow to keep up with the ingenuity of criminals and have the adequate means in place to bring the perpetrators to justice. Modus operandi of criminals as well as the responses thereto differ in light of the different forms of crimes that affect the environment. Boxes 8, 9 and 10 provide examples of modus operandi in the fishery sector, in relation to hazardous wastes and other wastes, and illegal mining.



Photo Credit: UNODC

#### Box 8: Fisheries Crime

Conducted by UNODC's Global Programme for Combating Wildlife and Forest Crime, the first step in providing technical assistance to address crimes in the fisheries sector is to conduct a value chain analysis, which identifies the country-specific value chain stages, government agencies involved, and possible entry points for different types of crime. The purpose of the value chain approach is two-fold: firstly, it allows for the identification of the numerous points along the chain at which different types of criminal offences typically occur. Secondly, it allows for the highlighting of potential entry points for law enforcement interventions in identifying, investigating and prosecuting crime throughout the sector. This approach facilitates understanding of all the various stakeholders involved in the value chain and enables better coordination amongst agencies involved. Further, it provides an overview of the potential gaps that make the fisheries sector lucrative for organized criminal groups. The value chain analysis is the starting point for more targeted technical assistance. For example, it forms the basis for the corruption risk assessment by identifying potential vulnerabilities to corruption within the value chain and opportunities for proactive intervention. The value chain analysis also allows for the identification of other potential technical assistance needs; for example, capacity building requirements to address gaps in the criminal justice approach to this issue.

According to an INTERPOL study in the West African Coastal Region in 2014, the six most widespread modus operandi of crimes in the fisheries sector were surveillance avoidance, transshipment, abuse of vessel registries, licensing abuses, interactions with artisanal vessels and sisterships.<sup>63</sup> For example, vessels engaged in illegal fishing employ different techniques to avoid surveillance and detection by law enforcement, which include interfering with electronic monitoring systems, and intentionally obscuring vessel markings and identity.<sup>64</sup> The study further found that the absence of transparency in fishing license regimes makes the identification and investigation of possible violations exceedingly difficult.<sup>65</sup>



### Box 9: Hazardous waste and other waste<sup>66</sup>

Due to the high costs of treating and disposing hazardous and other wastes, illegal transboundary movements of hazardous wastes and other wastes have become an increasing global concern.<sup>67</sup> INTERPOL analyzed the criminal trends and threats in the plastic waste market since 2018, observing large re-routing of, for example, plastic waste exports.<sup>68</sup> According to INTERPOL, difficulties in treating and monitoring the plastic waste surplus in both export and import countries have opened doors for opportunistic crime in the plastic waste sector, both in terms of illegal trade and illegal waste treatment.<sup>69</sup> The use of transit countries to disguise the origin of the waste shipment has been observed as modus operandi for such illegal shipments.<sup>70</sup> INTERPOL further found that there has been an increase in the illegal treatment of plastic waste, e.g., illegal landfills and irregular waste fire, and an increase in fraudulent documents and misdeclaration of plastic waste.<sup>71</sup> In 2021, the Conference of the Parties to the Basel Convention adopted the Basel Convention Plastic Waste Amendments to increase the control of the plastic waste stream, which has been effective since 1 January 2021.<sup>72</sup>

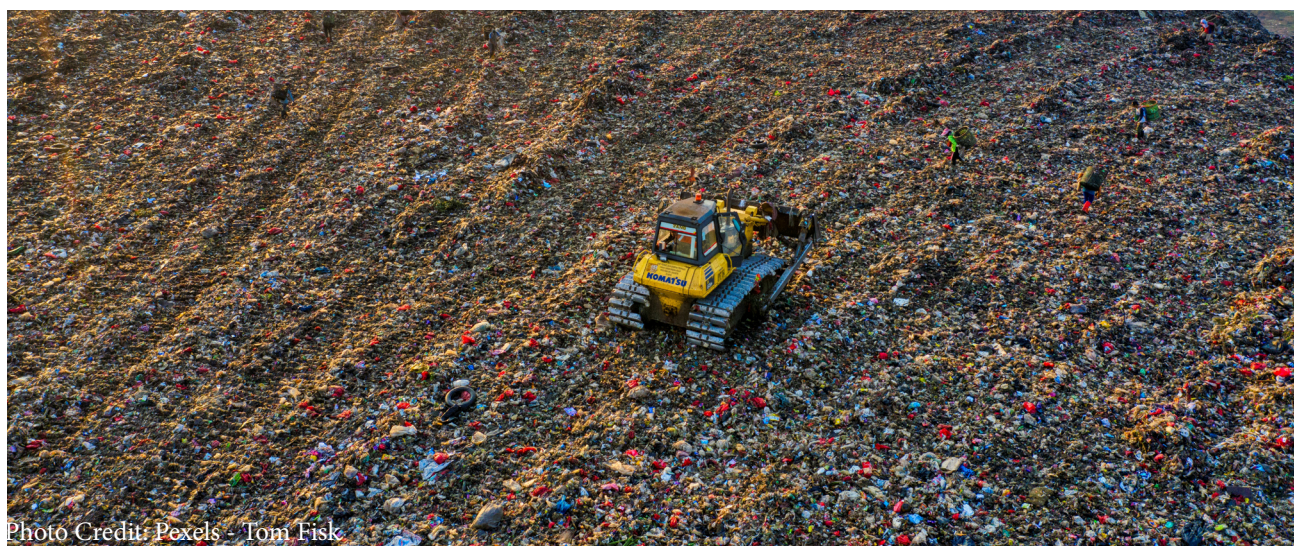


Photo Credit: Pexels - Tom Fisk

### Box 10: Illegal Mining

Illegal mining and illicit trafficking of precious metals constitute a growing threat and a profitable transnational criminal industry that has lasting impacts on the livelihoods of communities and the environment. Organized criminal groups which engage in illicit mining and trafficking in precious metals take advantage of the vulnerability of the supply chain,<sup>73</sup> corruption, loopholes in national and international legislation, and weak law enforcement.<sup>74</sup> For example, according to a recent INTERPOL report analysing the illegal gold mining in Central Africa in 2021, the modus operandi entails smuggling the gold within or out of the region both overland and by air. By land, the organized criminal groups exploit many of the cross-border routes and use concealment methods, while by air, they hire associates (gold-mules) to carry the gold in hand luggage via commercial airlines, taking advantage of low screening airports. Private planes are also used to move larger quantities across borders. The study also notes that the Central Africa elite nationals, who have been granted mining licenses, team up with foreign companies to exploit gold illegally. For example, to gain access to the land, these individuals and companies use associates to obtain photocopies of the villagers ID cards on the pretext that a mining company needs the ID to implement water and electricity facilities in the village. The ID are in turn used to fraudulently obtain artisanal mining authorisations, thus gaining access to the land.<sup>75</sup>

A better understanding of the modus operandi will also help identify comprehensive responses to such crimes, developing strategies to effectively detect, investigate and prosecute crimes that affect the environment. With the criminal actors getting more sophisticated in avoiding surveillance and detection when committing crimes that affect the environment, it is key to ensure that the responses thereto also become more sophisticated. It is key to keep pace with the latest technological developments, and implement special investigation techniques to facilitate the detection, and investigation of crimes that affect the environment. UNEP highlighted several types of technologies, in addition to drones, that wildlife and law enforcement agencies are deploying in response to the increasing numbers of crimes that affect the environment.<sup>76</sup> Acoustic traps, for example, are increasingly used to augment traditional anti-poaching patrols and monitor sound waves for sharp disturbances such as gunshots, chain saws, truck engines, blasts or airplane engines.<sup>77</sup> Technology can also be used

to empower the public to report crimes that affect the environment. For example, the Spatial Monitoring and Reporting Tool is an open-source software programme that was created by and for the conservation community to engage those on the frontline of fighting wildlife crime.<sup>78</sup> Other technologies in this field include microcopters, radio frequency identification tags, military-style digital networks, camera traps, radio collars, illegal trade databases, metal scanners, satellite imaging, or DNA testing.<sup>79</sup>

Joint operations, bringing together international partners and Member States, have been successfully conducted to combat crimes that affect the environment. For example, INTERPOL has been leading with the World Customs Organizations since 2017 a series of “Thunder” operations, resulting in significant seizures and the arrest of thousands of suspects engaged in the illegal trade of wildlife and timber species (see box 11).

#### **Box 11: Operation Thunder Coordinated by INTERPOL and the World Customs Organization (WCO), Operation Thunder 2020 Rallied 103 Countries against Environmental Crime**

Focusing on pre-identified routes and hotspots, Operation Thunder 2020, held from 14 September to 11 October 2020, resulted in more than 2,000 seizures of wildlife and forestry products. In total, 699 offenders were apprehended, and at least one INTERPOL Red Notice has already been requested based on information gained during the operation. Further arrests and prosecutions are anticipated as ongoing global investigations progress. Participating countries focused on particularly vulnerable species protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), an international agreement aimed at ensuring the international trade in wild animals and plants does not threaten their survival. The total seized contraband included: over 1.3 tonnes of ivory, over 1 tonne of pangolin scales, representing approximately 1,700 killed pangolins, 56,200 kg of marine products, 87 truckloads of timber (950 tonnes), 15,878 kg of plants. During the operation, more than 45,500 live animal and plant specimens were recovered, including 1,400 turtles and tortoises and 6,000 turtle or tortoise eggs, 1,160 birds and 1,800 reptiles.<sup>80</sup>

To curb the crimes that affect the environment, it is critical to holistically support actors throughout the criminal justice chain, “from crime scene to court”, in order to ensure that detections and interceptions lead to investigations, prosecutions and adjudications. UNODC’s Global Programme for Combating Wildlife and Forest Crime, which leads UNODC’s work on crimes that affect the environment, has pioneered such an approach and has seen considerable increases in successful adjudications stemming from support to investigators and prosecutors, and sensitization of judges. From training on crime scene management and forensics through to providing bench books for judges, every step is critical towards creating a deterrent and ensuring justice. Success is possible. For example, following the development of a “rapid reference guide/points to provide guide” that was developed by the Global



Programme together with investigators and prosecutors, a marked increase was seen in successful cases brought through court in Kenya and Tanzania.

It is also vital to strengthen customs operations and equip law enforcement authorities with the necessary knowledge to detect and investigate such crimes. The UNODC-WCO Container Control Programme (CCP), for example, supports Member States in the creation of container profiling inter-agency port control units (PCUs) at selected container terminals in seaports or dry ports to minimize the exploitation of high-risk containers for the illicit trafficking of drugs and other transnational organized crime activities.<sup>81</sup> The Container Control Programme is committed to improving Member States' capacity to achieve environmental justice and conservation goals, in line with the CITES and the Sustainable Development Goals.<sup>82</sup> In 2018 an inspection conducted by the PCU in Vietnam discovered 528 kg of pangolin scales, 129 lion teeth, 93 animal claws, three leopard

skins and assorted timber.<sup>83</sup> CCP also works in the fields of crimes in the fisheries sector, illicit timber, plastic and hazardous waste. On 15 June 2021, WCO and UNODC launched the "CCP Project on Countering Illegal Hazardous Waste Trafficking", aiming to improve the capacity of customs administrations and other enforcement agencies to counter illegal shipments of plastic and hazardous waste, specifically in the cargo supply chain.<sup>84</sup> In addition, the Container Control Programme launched specialized training programmes focusing on the fishing sector or the trafficking in timber.<sup>85</sup> In addition, through partnerships such as LEAP, the Law Enforcement Assistance Programme to Reduce Tropical Deforestation, UNODC teams up with international partners seeking to share expertise and build global networks to fight illegal deforestation and related crimes. Within the framework of LEAP, CCP provides specialized technical training on timber identification, risk indicators, modus operandi and international communication for Customs and other relevant port-based law enforcement.<sup>86</sup>

## The impact of COVID-19 pandemic on the modus operandi of criminals involved in wildlife crime

The COVID-19 pandemic, related global travel restrictions and other factors influence the scale, transportation methods and overall mode of operations of organized criminal groups involved with crimes that affect the environment. While the COVID-19 pandemic might have brought short-term disruptions, buyers and sellers seem to reorganize and increase their focus on online trade channels and related mechanisms. UNODC further found, in relation to wildlife crime, evidence that there is increased

poaching if there are declines in tourism and its associated revenue and, hence, increases in subsistence poaching are realistic probabilities to emerge from the pandemic. Park and protected area closures and a decrease in patrols by rangers have already contributed to increased poaching activities in some countries. Further, UNODC found evidence that wildlife products may be sold as 'cures' for COVID-19, notably bear bile and various plant species used in traditional medicine.<sup>87</sup>

## Following the money - Combating illicit financial flows derived from crimes that affect the environment and confiscating the proceeds of crimes

Combating crimes that affect the environment also requires "following the money" to make sure that these highly lucrative crimes do not pay. When looking at the investigation of crimes that affect the environment, it is crucial to address the illicit financial flows derived from these crimes and confiscate the proceeds of crimes. The importance of countering illicit financial

flows has been recognized in the Sustainable Development Goals under target 16.4: "[b]y 2030, significantly reduce illicit financial flows and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime." In Resolution 10/6 of the Conference of the Parties to the UNTOC, it is emphasized that crimes that affect the environment have become

some of the most lucrative transnational criminal activities, and that money-laundering and the illicit financial flows derived from them may contribute to the financing of other transnational organized crimes and terrorism.<sup>88</sup>

Despite the significant proceeds involved, the focus on crimes that affect the environment in relevant risk assessments and financial investigations has been limited to date.<sup>89</sup> In response to a survey by the Financial Action Task Force (FATF) conducted in 2021, less than half of respondent countries had considered crimes that affect the environment in their national or sectoral money laundering risk assessments,

while underlining that actions to detect and disrupt financial flows related to crimes that affect the environment have not been proportionate to the scale of this issue.<sup>90</sup> Challenges identified by FATF include (i) limited coordination between authorities, such as financial investigators and supervisors, and actors implementing environmental crime and protection policies, and (ii) a lack of powers or resources for law enforcement to investigate and trace the proceeds from environmental crime, as well as in some cases (iii) insufficient societal awareness and political commitment.

### Box 12: Illicit Financial Flows and Wildlife Criminal Cases

According to the 2020 World Wildlife Crime Report of UNODC, wildlife criminal cases very often start and end with the seizure, with the limited investigation into the wider criminal network beyond the poacher or courier. UNODC also found that financial investigation and anti-money-laundering techniques are rarely used in the fight against wildlife crime. As a result, there are major gaps in the understanding of the financial flows behind wildlife crime, which means that inadequate measures are being undertaken to mitigate the risks of wildlife crime and associated money-laundering.<sup>91</sup> The report “Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime”<sup>92</sup>, prepared by UNODC and the Asia/Pacific Group on Money Laundering, identifies risks and vulnerabilities of money laundering related to wildlife crimes, and provides guidance and recommendations to enhance the financial aspect of wildlife crime investigations in the Asia-Pacific region. The report concluded that only 26% of responded jurisdictions<sup>93</sup> conducted financial investigations into wildlife crimes, including financial investigations related to the predicate offence, asset forfeiture, or in pursuit of money laundering charges.

## Holding Perpetrators Accountable and Restoring Justice for Victims

Despite the damage caused, crimes that affect the environment are still too often wrongly perceived as being victimless and incidental and are, hence, not always considered a high priority.<sup>94</sup> Legislation and policies in place often do not reflect the serious nature of the crimes, or fail to take into account the sheer scale of loss of resources resulting from such crimes.<sup>95</sup> In a review of 131 States in 2015, only 26 per cent of these States punished violations of CITES with a maximum deprivation of liberty of four years or more; 31 per cent of States punished violations through the use of fines only,<sup>96</sup> thereby excluding these conducts from the enhanced investigative powers that many legal systems provide to law enforcement in the cases of serious crime and, in many cases, from the scope of application of UNTOC and the related international cooperation under this

instrument (Art. 3). As mentioned above, in line with resolution 10/6 of the COP-UNTOC, two working groups of the COP-UNTOC, namely the Working Group of Government Experts on Technical Assistance and the Working Group on International Cooperation will in more detail explore criminalisation approaches in considering ways to address crimes that affect the environment, during the joint thematic discussion on the application of the Convention for preventing and combating transnational organized crimes that affect the environment in May 2022.

With a view to holding perpetrators accountable for crimes that are committed against the environment, it also is important to consider the liability for the harms and



compensation for damage caused by such crimes. ECOSOC resolution 1994/15 listed in an annex to the resolution a number of recommendations concerning the role of criminal law in protecting the environment to be considered by Member States.<sup>97</sup> For example, paragraph (a) states that generally recognized principles, such as the “polluter pays” principle described in principle 16 of the Rio Declaration on Environment and Development, should be considered when establishing environmental legislations.<sup>98</sup> Paragraph (g) of the same resolution provides that the idea of imposing criminal or non-criminal fines or other measures on corporations in jurisdictions in which corporate criminal

liability is not currently recognized in the legal systems, should be further considered.<sup>99</sup> Member States also discussed criminal responsibility during the deliberations of the Ninth UN Crime Congress in 1995, where the Congress touched upon the models of criminal responsibility of corporations and analyzed the responsibilities of large-scale enterprises, small-scale enterprises and individual polluters.<sup>100</sup> Applicable provisions on establishing the liability of legal persons for the participation in crimes can also be found in the UNTOC and the UNCAC.<sup>101</sup> UNODC’s “Guide on Drafting Legislation to Combat Wildlife Crime”, introduces model provisions for the liability of legal persons.<sup>102</sup>

### Box 13: Legislative Guides

To facilitate the implementation of the Organized Crime Convention and the adoption by States of consistent policies, strategies and plans to respond to the challenges in transnational organized crime, UNODC is developing a series of legislative guides on: (1) waste trafficking; (2) crimes in the fisheries sector; and (3) illegal mining. This work will complement the existing Guide on Drafting legislation to Combat Wildlife Crime, launched by UNODC in 2018.<sup>103</sup> The development of such legislative guides is part of a larger effort initiated by UNODC focused on the operational implementation of the Organized Crime Convention to prevent and combat crimes that affect the environment. The Legislative Guides are intended to support States in enacting or strengthening domestic legislation in these three areas of focus. States will be able to use these legislative guides as a practical tool as they draft, amend, or review national legislation within their constitutional and legislative frameworks. The legislative guides will not be a model law as such and will not provide a “one-size-fits-all” model ready to be introduced into a State’s legal system. Rather, UNODC recognizes that legislation must be tailored to each State’s legal tradition and social, economic, cultural, and geographical conditions.

## Victims of Crimes that Harm the Environment are not Widely Recognized as Victims of “Crime”

Victims of crimes that harm the environment are not widely recognized as victims of “crime” and are hence often excluded from the traditional victimology. At the 22<sup>nd</sup> regular session of the CCPCJ in 2013, the topic of victims was discussed during the PNI workshop on “Emerging forms of crime that have an impact on the environment: lessons learned”, e.g., the scope of victims of environmental crime.<sup>104</sup> There are several international standards and norms relevant to victims of environmental crime. For example, access to justice in environmental matters, access to information and public participation in decision making are enshrined under Implementing Principle 10 of the Rio Declaration on Environment and Development,

the Aarhus Convention<sup>105</sup> and the Escazu Agreement.<sup>106</sup> UNEP prepared the Guidelines for the Development of National Legislation on Access to Information, Public Participation and Access to Justice in Environmental Matters.<sup>107</sup> UNODC provides technical assistance and has developed a series of tools e.g., the Criminal Justice Assessment Toolkit,<sup>108</sup> a standardized and cross-referenced set of tools on the planning for technical assistance with a specific tool dedicated to victims and witnesses.

As crimes that affect the environment do not stop at borders and are increasingly more complex, there is urgency in greater information-sharing and cooperation at the national, regional, and international level in order to detect, investigate

## Day 2: Combating Crimes that Affect the Environment

and prosecute such crimes in a more holistic and effective manner and to develop best practices on how to combat these crimes. UNODC has developed SHERLOC, a knowledge management portal which contains a plethora of information on national legislation and international instruments, case law, national and regional strategies.



Photo Credit: Pixabay - pixundfertig

### Box 14: UNODC SHERLOC Knowledge Management Portal

To meet the urgency of greater information-sharing and cooperation, UNODC launched in 2012 SHERLOC for Sharing Electronic Resources and Laws on Crimes and disseminating information on how States implement the Organized Crime Convention and the three Protocols thereto as well as the international legal framework against terrorism. SHERLOC is a global, multilingual, comprehensive, and multidisciplinary portal, being developed with a wide user base in mind: policy makers, legislative drafters, law enforcement officers, other government officials, international civil servants, officials of national authorities responsible for international cooperation, prosecutors, lawyers, judges, academics, students, members of non-governmental organization and civil society. It includes information on a range of criminal activities, including crimes affecting the environment, in its five databases (national legislation, case law, national and regional strategies, international instruments, bibliography database) as well as information on designated competent national authorities in its directory of central and competent authorities. SHERLOC is a powerful tool catering to the needs of the broad spectrum of users.

## Discussion Questions

- 1 What challenges do law enforcement officers face and which good practices have been developed in adapting to such challenges?
- 2 Can you share effective techniques employed in your country to combat crimes that affect the environment?
- 3 How has the COVID-19 pandemic impacted the modus operandi of criminals involved in crimes that affect the environment?
- 4 Are there laws and regulations in place in your country that specifically address the protection of victims and witnesses of crimes that affect the environment? What are some good practices in restoring the damages caused by criminals?
- 5 What methods of money-laundering have been observed in your country regarding the proceeds of crimes that affect the environment? What do you see as the challenges in and good practices for addressing money laundering in this context?
- 6 What are the main challenges with the confiscation of proceeds of crimes that affect the environment? Do you have good practices to share?



## Day 3: Strengthening International Cooperation to Address Crimes that Affect the Environment

Crimes that affect the environment are transnational, and it is crucial that the responses to these multi-faceted crimes are comprehensive and global in nature. Cooperation must take place at all levels, bilateral, regional, and international, and must include all relevant stakeholders that can help to curb crimes that affect the environment.

Since the adoption of the UNTOC and the UNCAC, Member States have increasingly considered how those Conventions could be applied as tools to combat emerging forms of crime, including those that have a significant impact on the environment. In the 2021 Kyoto Declaration, Member States committed to strengthening effective international cooperation in criminal matters, including in the areas of extradition and mutual legal assistance, facilitating the use of existing regional and international instruments, including the Convention against Corruption and the Organized Crime Convention, as a legal basis for extradition and mutual legal assistance cooperation, and implementing and concluding, as necessary, agreements or arrangements to enhance international cooperation in this regard.<sup>109</sup> One of the means to strengthen cooperation among Member States in addressing crimes that affect the environment is to facilitate mutual legal assistance and extradition, including through the application of the provisions of the UNTOC and UNCAC in the absence of bilateral agreements.

As noted above, in line with resolution 10/6 of the COP-UNTOC, two working groups of the COP-UNTOC, namely the Working Group of Government Experts on Technical Assistance and the Working Group on International Cooperation, will in more detail explore issues relating to international cooperation to combat crimes that affect the environment, including the

practical application of the relevant provisions of the UNTOC, during the joint thematic discussion on the application of the Convention for preventing and combating transnational organized crimes that affect the environment in May 2022.

Another effective means of facilitating international cooperation is through regional and international cooperation and coordination mechanisms and networks. At the operational level, regional cooperation arrangements may include the designation of international cooperation focal points, communication of national requirements and procedures for cooperation, creation of secure communication channels or platforms, and mechanisms for handling cases and sharing experiences between authorities of participating States. Such activities may focus on the facilitation of formal judicial cooperation and informal or formal law enforcement cooperation and intelligence-sharing.<sup>110</sup> At the regional level, UNODC has continued to support Member States in setting up informal networks of prosecutors and central authorities to facilitate international cooperation, including - the Central American Network of Prosecutors against Organized Crime, the West African Network of Central Authorities and Prosecutors against Organized Crime (WACAP), the Judicial Cooperation Network for Central Asia and Southern Caucasus (CASC Networking), the Great Lakes Judicial Cooperation Network (GLJC), the South East Asia Justice Network (SEAJust Network) as well as the informal asset confiscation networks, including those following the model of the Camden Asset Recovery Inter-Agency Network (CARIN) (ARIN-AP, ARIN-CARIB, ARIN-EA, ARIN-SA, ARIN-WA, ARIN-WCA and RRAG).<sup>111</sup>

**Box 15: Wildlife Enforcement Networks (WENs)**, for example, seek to achieve bilateral, regional and international cooperation, including through intelligence-sharing, joint operations and cross-border cooperation. Critically, WENs are tailored to the specific needs and issues within targeted regions. WENs are an effective tool to promote collective efforts to combat these crimes, and there are currently ten WENs at various stages of implementation around the world.

### Enhancing international inter-agency cooperation and the provision of technical assistance and capacity building

All actors of the environmental enforcement chain (including inspectorate and environmental agencies, police, customs, prosecutor, and judiciary) have to be trained on the legal and technical aspects of crimes that affect the environment and regularly updated about the new trends related to the issue.<sup>112</sup> In this regard, UNODC, provides technical assistance and capacity building to improve knowledge of these crimes and raise awareness of their impact; support information sharing for cross-border investigations; and improve coordination among national, regional and international stakeholders.<sup>113</sup>

Inter-agency cooperation is another key element in the international community's joint efforts to address crimes that affect the environment. In this context, special reference should be made to the International Consortium on Combating Wildlife Crime (ICCWC). Established in 2010, the ICCWC is

the collaborative effort of the CITES Secretariat, INTERPOL, UNODC, the World Bank and the WCO, working to bring coordinated support to the national wildlife law enforcement agencies and to the subregional and regional networks that, on a daily basis, act in defense of natural resources.<sup>114</sup> The ICCWC Strategic Programme 2016-2020 identifies improving the use of knowledge and innovation to inform contemporary approaches to wildlife and forest crime as a focus area for ICCWC activities.<sup>115</sup> In 2020, ICCWC celebrated its first decade of action, working with wildlife law enforcement along the entire criminal justice chain to deter, detect, detain, and dismantle criminal networks involved in wildlife crime.<sup>116</sup> In June 2021, the ICCWC launched the 2020 Annual Report, showcasing ICCWC's collective resolve and providing examples of ICCWC assessments, technical assistance and operational support provided to law enforcement authorities responsible for wildlife law enforcement.<sup>117</sup>

As mentioned above, the following organizations are members of ICCWC:

i

The CITES Secretariat assists CITES Parties to implement the Convention and offers a variety of tools, expertise, documents, and training. Apart from the work that has been mentioned in the previous parts of the background note, the CITES Secretariat has developed a template for a model law on international trade in wild fauna and flora that can be used by States Parties in order to develop new, and analyze existing, legislation to support the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora.<sup>118</sup> The Secretariat has also issued a legislation checklist to review domestic CITES laws.<sup>119</sup> The CITES Secretariat also hosts the CITES Virtual College, the Directory of enforcement focal points, and the CITES – International Tropical Timber Organization (ITTO).<sup>120</sup>

ii

UNODC, through its Global Programme for Combating Wildlife and Forest Crime, provides its expertise “from crime scene to court,” as it has the mandate and expertise to support national agencies across the entire criminal justice chain, from legal reforms to technical support on forensics and anti-corruption, from capacity building and data analysis to informing policy, from developing tools and guides for the enforcement community to supporting interregional cooperation. UNODC undertakes, on behalf of ICCWC, the foundational assessments of the ICCWC Analytic Toolkit on Wildlife and Forest Crime, as well as the Indicator Framework, which provide an understanding of the needs related to addressing wildlife and forest crime in the countries concerned.



iii

The Environmental Security Programme of INTERPOL is responsible for addressing environmental crimes, and aims to assist member countries in the effective enforcement of national and international environmental laws, including environmental treaties.<sup>121</sup> Its Law Enforcement Assistance for Forests (Project LEAF), already referred to above, focuses on forestry crime; Project Predator mainly focuses on the poaching of Asian big cats and the trafficking of their parts and derivatives; Project Scale addresses illegal fishing and associated criminal or administrative violations; Project Wisdom aims to tackle the poaching of elephants and rhinos, as well as the subsequent trafficking of ivory and rhino horns; and the Environmental Compliance and Enforcement Committee (ECEC) provides strategic advice on relevant issues and global support.<sup>122</sup>

iv

The World Bank's Global Wildlife Program is a global partnership that promotes wildlife conservation and sustainable development by combating illicit trafficking in wildlife.<sup>123</sup>

v

The World Customs Organization (WCO) launched its Environmental Programme in 2012 to contribute to the combating of environmental crime, in particular, illegal wildlife trade, illegal trade in hazardous and other waste, ozone-depleting substances and illegal trade in timber.<sup>124</sup>

### Box 16: Operation DEMETER VI: 131 Seizures in Illegal Transboundary Waste & Ozone Depleting Substances Trade<sup>125</sup>

Seventy-three customs administrations, in partnership with the World Customs Organization, successfully implemented Operation DEMETER VI with a focus on transboundary shipments of illegal waste and ozone-depleting substances (ODS). The operation resulted in 131 seizures, including nearly 99,000 tonnes of waste and an additional 78,000 pieces of waste materials, as well as 42 tonnes of substances controlled by the Montreal Protocol on Substances that Deplete the Ozone Layer.

About 92% of the seized waste commodities were metal waste (90,872 tonnes), and about 7% consisted of various types of plastic waste (6,859 tonnes). Other commodities seized included machines and electric/electronic waste, waste from production and manufacturing, other industrial waste, contaminated used clothing, municipal waste, used tyres, waste solar panels, paper waste, textile waste, and mixed wood waste. Nearly 75% of ODS seized were HFCs (over 31 tonnes), which are mostly used in refrigeration and air conditioning systems, in the manufacture of foams and insulating materials, as well as fire extinguishing agents.

Operation DEMETER IV is a successor to several DEMETER operations dating back to 2009. The operation was led by the WCO secretariat, the Regional Intelligence Liaison Offices (RILOs) for Asia/Pacific and Western Europe, as well as China Customs. It was supported by other partners, including UNODC, UNEP, INTERPOL, EUROPL, the European Anti-Fraud Office, the EU Network for Implementation and Enforcement of Environmental Law (IMPEL), and Secretariat of the Basel Convention.

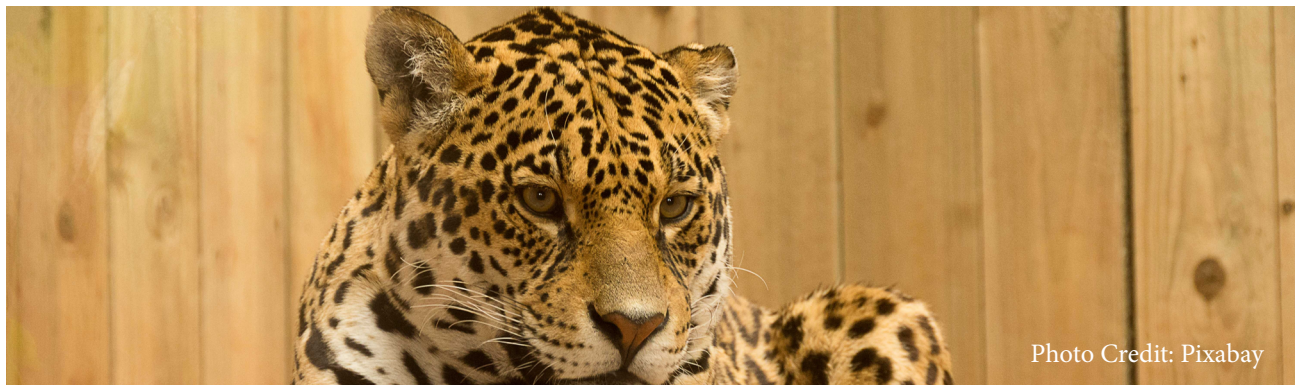


Photo Credit: Pixabay

Worth mentioning is also the International Union for Conservation of Nature (IUCN), which is the oldest and largest global environmental organization, with more than 1,400 member organizations. It assesses the extinction risk of species and leads conservation projects aimed at the sustainable management of biodiversity and natural resources.<sup>126</sup>

Apart from ICCWC, there are many other international inter-agency initiatives. For example, the Green Customs Initiative (GCI)<sup>127</sup>,

launched in 2004, is a partnership of international entities cooperating to prevent the illegal trade in environmentally sensitive commodities and substances and to facilitate their legal trade. Its objective is to enhance the capacity of customs and other relevant border control officers to monitor and facilitate the legal trade and to detect and prevent illegal trade in environmentally sensitive commodities covered by relevant trade-related Multilateral Environmental Agreements and international conventions.

### Box 17: Fifteen Years of a Strong Partnership for Green Customs<sup>128</sup>

In December 2020, thirteen GCI partners, including, among others, UNODC, UNEP, WCO, INTERPOL and CITES, came together virtually to reflect on their 2019-2020 activities, which supported national action and international cooperation on environmental crime prevention. This meeting marked fifteen years of sustained and successful collaboration between the GCI partners, including United Nations entities, secretariats to major multilateral environmental agreements and international organizations involved in biodiversity governance, chemicals management, international customs and trade, and their enforcement. In a special session on the COVID-19 pandemic, partners had an honest discussion regarding the impact of the pandemic on their day-to-day work (for example, training now delivered virtually), but most importantly on their respective areas of competence, as the pandemic has shown the potentially adverse consequences of trade in environmentally sensitive commodities, especially wildlife and healthcare waste. In light of these consequences, the partners committed to strengthening their coordination to ensure that customs and border control officers are properly equipped to safeguard their countries' environmental and human health.

## Discussion Questions

1

What is necessary to ensure closer cooperation among Member States in the region and at the international level, and how can informal information exchange, parallel and joint investigations be simplified and facilitated?

2

How can the existing cooperation networks in your region be fully utilized to address crimes that affect the environment in a prompt and effective manner?

3

What are the key areas (of preventing and combating crimes that affect the environment) that require technical assistance and capacity building in your country? Which technical assistance do you offer to partners, bilaterally or in the context of multilateral initiatives, to address crimes that affect the environment?

4

What do you see as the effective approaches to enhance international inter-agency cooperation, considering a large number of stakeholders and their different mandates in the various forms of crimes that affect the environment?



# References

- 1 Kyoto Declaration on Advancing Crime Prevention, Criminal Justice, and the Rule of Law: towards the Achievement of the 2030 Agenda for Sustainable Development, UNODC, 2021. All resources were accessed in September and October 2021.
- 2 Kyoto Declaration, p.16, para 87, *ibid*.
- 3 CCPCJ, E/CN.15/2021/L.4/Rev.1, Preventing and combating crimes that affect the environment.
- 4 *Ibid*.
- 5 United Nations, Our Common Agenda, Report by the Secretary General, 2021, [https://www.un.org/en/content/common-agenda-report/assets/pdf/Common\\_Agenda\\_Report\\_English.pdf](https://www.un.org/en/content/common-agenda-report/assets/pdf/Common_Agenda_Report_English.pdf)
- 6 UNEP, The State of Knowledge of Crimes that have Serious Impacts on the Environment, 2018, p.VIII, [https://wedocs.unep.org/bitstream/handle/20.500.11822/25713/knowledge\\_crime\\_envImpacts.pdf?isAllowed=y&sequence=1](https://wedocs.unep.org/bitstream/handle/20.500.11822/25713/knowledge_crime_envImpacts.pdf?isAllowed=y&sequence=1).
- 7 UNODC, Global Programme for Combating Wildlife and Forest Crime: Annual Report 2020, p.9ff
- 8 UNODC, Global Programme for Combating Wildlife and Forest Crime: Annual Report 2020, p.8, [https://www.unodc.org/documents/Wildlife/Annual\\_Report\\_GPWLFC2020.pdf](https://www.unodc.org/documents/Wildlife/Annual_Report_GPWLFC2020.pdf).
- 9 UNEP, The State of Knowledge of Crimes that have Serious Impacts on the Environment, 2018, p.XIV.
- 10 ECOSOCO Resolution 1994/15.
- 11 A/CONF.144/28/REV.1, Report of the Eighth United Nations Congress on the Prevention of Crime and Treatment of Offenders, p.130, [https://www.unodc.org/documents/congress/Previous\\_Congresses/8th\\_Congress\\_1990/028\\_ACONF.144.28.Rev.1\\_Report\\_Eighth\\_United\\_Nations\\_Congress\\_on\\_the\\_Prevention\\_of\\_Crime\\_and\\_the\\_Treatment\\_of\\_Offenders.pdf](https://www.unodc.org/documents/congress/Previous_Congresses/8th_Congress_1990/028_ACONF.144.28.Rev.1_Report_Eighth_United_Nations_Congress_on_the_Prevention_of_Crime_and_the_Treatment_of_Offenders.pdf).
- 12 Report of the Ninth UN Crime Congress, para.360. Matti Joutsen, the Evolution of the United Nations Congresses on Crime Prevention and Criminal Justice.
- 13 UNODC, Salvador Declaration, 2010, OP 14.
- 14 UNODC, Doha Declaration, 2015, OP 9 (e).
- 15 UNODC, the Kyoto Declaration, OP21.
- 16 UNODC, Annual Report 2020 of the Global Programme for Combating Wildlife and Forest Crime, 2020, p.8.
- 17 UNODC, E/CN.15/2013/2, Discussion guide for the thematic discussion on the challenge posed by emerging forms of crime that have a significant impact on the environment and ways to deal with it effectively, CCPCJ, 2013, para. 37.
- 18 UNEP & INTERPOL, the rise of environmental crime, 2016, p.9,
- 19 UNODC, World Wildlife Report, 2020..
- 20 UNODC, E/CN.15/2013/2, para. 37, *supra* note 12,
- 21 [A/RES/69/314](#).
- 22 [A/RES/68/205](#).
- 23 UN NEWS, World Wildlife Day: UN Chief urges “more caring” relationship with nature, 3 March 2020, <https://news.un.org/en/story/2020/03/1058491>.
- 24 Film showcase of the World Wildlife Day, <https://www.wildlifeday.org/content/competitions>.
- 25 UNEP, World Wildlife Day highlights importance of sustainable use of wildlife in “biodiversity super year”, 3 March 2020, <https://www.unep.org/es/node/27269>.
- 26 CITES, in support of World Wildlife Day 2020: IFAW joins CITES and UNDP to sponsor Global Youth Art Contest,
- 27 UNEP, World Wildlife Day highlights importance of sustainable use of wildlife in “biodiversity super year”.
- 28 UNODC, Annual Report 2020 of the Global Programme for Combating Wildlife and Forest Crime, p.18.
- 29 UNEP, World Wildlife Day highlights importance of sustainable use of wildlife in “biodiversity super year”.
- 30 ICCWC, Annual Report 2020, June 2021, p.23, [https://cites.org/sites/default/files/EST/ICCWC\\_AnnRep\\_2020.pdf](https://cites.org/sites/default/files/EST/ICCWC_AnnRep_2020.pdf).
- 31 CBD, Communication, Education and Public awareness, <https://www.cbd.int/cepa/>.
- 32 CBD, UNESOC, Commission on Education and Communication, the World Conservation Union, Mainstreaming Biological Diversity the role of communication, education and public awareness, [https://www.iucn.org/downloads/cec\\_mainstreaming\\_biological\\_diversity\\_cepa\\_eng.pdf](https://www.iucn.org/downloads/cec_mainstreaming_biological_diversity_cepa_eng.pdf).
- 33 United Nations Decade on Biodiversity, <https://www.cbd.int/2011-2020/>.
- 34 International Day for Biological Diversity – 22 May, <https://www.cbd.int/idb/>.
- 35 [CITES Conf. 17.4](#)
- 36 CITES, DRAFT Guidance for CITES Parties to Develop and Implement Demand Reduction Strategies to Combat Illegal Trade in CITES-listed Species, 2021.
- 37 FATF, FATF Report on Money Laundering from Environmental Crime, 2021, p.3, <https://www.fatf-gafi.org/media/fatf/documents/reports/Money-Laundering-from-Environmental-Crime.pdf>.
- 38 UNICRI, Protecting the supply chain security: a briefing by UNICRI and IAEA on new technologies, November 2021, <http://213.254.5.198/index.php/News/UNICRI-IAEA-Workshop-Technology-Supply-Chain-Security>.
- 39 *Ibid*.
- 40 UNODC, World Wildlife Report 2020, p, 12.
- 41 UNODC, World Wildlife Report 2020, p, 26.
- 42 CITES Secretariat, Policy brief on eCITES, [https://cites.org/sites/default/files/eng/prog/e/eCITES\\_policy\\_brief.pdf](https://cites.org/sites/default/files/eng/prog/e/eCITES_policy_brief.pdf).
- 43 eCITES website: <https://cites.org/eng/prog/eCITES>.
- 44 [E/RES/2019/23](#)
- 45 UNICRI, Strengthening the Security and Integrity of the Precious Metals Supply Chain, 2016 [http://www.unicri.it/sites/default/files/2019-11/Strengthening%20the%20Security%20and%20Integrity%20of%20the%20Precious%20Metals%20Supply%20Chain\\_0.pdf](http://www.unicri.it/sites/default/files/2019-11/Strengthening%20the%20Security%20and%20Integrity%20of%20the%20Precious%20Metals%20Supply%20Chain_0.pdf).
- 46 *Ibid*.
- 47 UNODC, World Wildlife Report 2020, p, 26.
- 48 Technology and Security: Countering Criminal Infiltrations in the Legitimate Supply Chain, May 2021, UNICRI, <http://213.254.5.198/Publications/Technology--Security-Countering-Criminal-Infiltrations-Legitimate-Supply-Chain>.
- 49 INTERPOL, [Environmental Crime and its Convergence with other Serious Crimes](#), 2015, P.8.
- 50 UNODC, World Wildlife Crime Report 2020, p.122.
- 51 Wildlife Justice Commission, Convergence of wildlife crime with other forms of organised crime, p.50.

52 Ibid, p. 43.

53 UNEP & INTERPOL, [Strategic Report Environment, Peace and Security, a Convergence of Threats](#), December 2016.

54 INTERPOL, Uncovering the risks of Corruption in the forestry sector, December 2016, p.1.

55 Ibid.

56 CCPCJ, E/CN.15/2021/L.4/Rev.1 para. 29.

57 UNODC, Coca Cultivation in the Andean Region A Survey of Bolivia, Colombia and Peru, Chapter 2, June 2006, [https://www.unodc.org/pdf/andean/Andean\\_full\\_report.pdf](https://www.unodc.org/pdf/andean/Andean_full_report.pdf).

58 Ibid, p.21.

59 Ibid.

60 ILO, Caught at sea – Forced Labour and Trafficking in Fisheries, 2013, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_214472.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_214472.pdf).

61 UNEP & INTERPOL, Strategic Report Environment, Peace and Security, a Convergence of Threats, p.51, December 2016.

62 UNODC, E/CN.15/2013/2, Discussion guide for the thematic discussion on the challenge posed by emerging forms of crime that have a significant impact on the environment and ways to deal with it effectively, para. 23, CCPCJ, 2013.

63 INTERPOL, Study on Fisheries Crime in the West African Coastal Region, September 2014, p.13,

64 Ibid.

65 P.20, ibid.

66 Basel Convention, Article 4, para.3, <https://www.basel.int/Portals/4/Basel%20Convention/docs/text/BaselConventionText-e.pdf>.

67 UNEP, Waste crime – waste risks gaps in meeting the global waste challenge, 2015.

68 INTERPOL, INTERPOL Strategic Analysis Report Emerging criminal trends in the global plastic waste market since January 2018, p.5.

69 Ibid.

70 Ibid.

71 Ibid.

72 Decision BC-14/12, Conference of Parties to the Basel Convention, <http://www.basel.int/Implementation/Plasticwaste/PlasticWasteAmendments/FAQs/tabid/8427/Default.aspx>.

73 See UNICRI, Strengthening the Security and Integrity of the Precious Metals Supply Chain, May 2016, [http://www.unicri.it/in\\_focus/on/precious\\_metals\\_supply\\_chain\\_report](http://www.unicri.it/in_focus/on/precious_metals_supply_chain_report)

74 E/RES/2019/23

75 INTERPOL, Illegal gold mining in Central Africa, May 2021, <https://www.interpol.int/en/News-and-Events/News/2021/Central-Africa-Criminals-are-cashing-in-on-COVID-19-surge-in-gold-prices>

76 UNEP, Emerging Technologies: Smarter ways to fight wildlife crime, June 2014, [https://na.unep.net/geas/getUNEPPageWithArticleID-Script.php?article\\_id=113](https://na.unep.net/geas/getUNEPPageWithArticleID-Script.php?article_id=113).

77 Wrege, P., Rowland, E., Thompson, B., Batruch, N., Use of Acoustic Tools to Reveal Otherwise Cryptic Responses of Forest Elephants to Oil Exploration. Conservation Biology, 2010.

78 SMART, 2014. SMART conservation tools. SMART, <https://smartconservationtools.org/>.

79 UNEP, Emerging Technologies: Smarter ways to fight wildlife crime, supra note 83.

80 Interpol, <https://www.interpol.int/News-and-Events/News/2020/Wildlife-and-forestry-crime-Worldwide-seizures-in-global-INTERPOL-WCO-operation>

81 UNODC, Best Practice Guide for Forensic Timber Identification, the International Consortium on Combating Wildlife Crime, p.99.

82 UNODC, Key activities of CCP, <https://www.unodc.org/unodc/en/ccp/ccp-key-activities.html>.

83 Ibid.

84 WCO and UNODC launch new Project to enhance capacity for detecting illegal shipments of plastic and hazardous waste, Green Customs Initiative, July 12 2021, <https://www.greencustoms.org/news/wco-and-unodc-launch-new-project-enhance-capacity-detecting-illegal-shipments-plastic-and>.

85 UNODC, <https://www.unodc.org/unodc/en/ccp/ccp-key-activities.html>

86 UNODC, <https://www.unodc.org/unodc/en/press/releases/2018/june/norway-steps-up-the-fight-against-illegal-deforestation-with-un-and-interpol.html>

87 UNODC, World Wildlife Crime Report 2020, p.34.

88 The Conference of the Parties to the United Nations Convention against Transnational Organized Crime, Resolution 10/6, [https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION\\_10/Resolutions/Resolution\\_10\\_6\\_-\\_English.pdf](https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION_10/Resolutions/Resolution_10_6_-_English.pdf).

89 FATF, Money Laundering from Environmental Crime, July 2021, p.1.

90 Ibid.

91 UNODC, 2020 World Wildlife Crime Report of UNODC, p.107.

92 UNODC and the Asia/Pacific Group on Money Laundering, Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime, 2017.

93 45 jurisdictions in total, including 12 jurisdictions from Asia-Pacific, 9 from Africa, 21 from Europe, 3 from Americas.

94 UNEP, The State of Knowledge of Crimes that have Serious Impacts on the Environment, 2018.

95 UNEP, INTERPOL, A Rapid Response Assessment: The Environmental Crime Crisis, 2014, p.17

96 Elliott, Lorraine, 'Cooperation on Transnational Environmental Crime: Institutional Complexity Matters' (2017) 26(2) Review of European Community and International Environmental Law 107.

97 ECOSCO resolution [1994/15](#).

98 Ibid.

99 Ibid.

100 [A/CONF.169/12](#).

101 Article 10 of UNTOC and Article 26 of UNCAC.

102 UNODC, Guide on Drafting Legislation to Combat Wildlife Crime, 2018, p.12 [https://sherloc.unodc.org/cld/uploads/res/guide-on-drafting-legislation-to-combat-wildlife-crime.html/Wildlife\\_Crime\\_ebook.pdf](https://sherloc.unodc.org/cld/uploads/res/guide-on-drafting-legislation-to-combat-wildlife-crime.html/Wildlife_Crime_ebook.pdf).

103 The first guide of this series on [drafting legislation to combat wildlife crime](#), was launched in 2018.

104 The International Centre for Criminal Reform and Criminal Justice Policy (ICCLR), Victims of Environmental Crime – Mapping the Issues, 2011.

105 United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Deci-



sion-making and Access to Justice in Environmental Matters, 25 June 1998.

106 Regional Agreement on Access to Information, Public Participation and Justice in Environmental Matters in Latin America and the Caribbean, March 2018.

107 UNEP, [Guidelines for the Development of National Legislation on Access to Information, Public Participation and Access to Justice in Environmental Matters](#), 2010.

108 UNODC, the Criminal Justice Assessment Toolkit, [https://www.unodc.org/documents/justice-and-prison-reform/cjat\\_eng/CJAT\\_Toolkit\\_full\\_version23Mar10all.pdf](https://www.unodc.org/documents/justice-and-prison-reform/cjat_eng/CJAT_Toolkit_full_version23Mar10all.pdf).

109 Kyoto Declaration p.12, OP 62.

110 UNODC, Best Practice Guide for Forensic Timber Identification, the International Consortium on Combating Wildlife Crime, 2016, p.92.

111 UNODC, p.99, *ibid*.

112 UNEP, the State of Knowledge of Crimes that have Serious Impacts on the Environment, p.42.

113 Statement of Ms. Ghada Waly, Executive Director of UNODC, at the COP10 side event, entitled “Enhancing International Cooperation to Prevent and Combat Environmental Crime”, October 2020, <https://www.unodc.org/unodc/en/speeches/2020/cop10seenvironment-131020.html>.

114 What is ICCWC? ICCWC website, [https://cites.org/eng/prog/iccwc\\_new.php](https://cites.org/eng/prog/iccwc_new.php).

115 ICCWC, The ICCWC Strategic Programme 2016-2020, <https://www.interpol.int/en/content/download/5078/file/ICCWC%20Strategic%20Mission%202014-2016.pdf>.

116 ICCWC Annual Report 2020, June 2021, p.19.

117 ICCWC, Annual Report 2020, [https://cites.org/sites/default/files/EST/ICCWC\\_AnnRep\\_2020.pdf](https://cites.org/sites/default/files/EST/ICCWC_AnnRep_2020.pdf)

118 CITES Secretariat, MODEL LAW on International Trade in Wild Fauna and Flora, <https://cites.org/sites/default/files/eng/prog/Legislation/E-Model%20law-updated-clean.pdf>.

119 CITES Secretariat, A Checklist for Reviewing CITES Legislation, <https://cites.org/sites/default/files/eng/prog/Legislation/ChecklistEN.pdf>.

120 UNODC, Best Practice Guide for Forensic Timber Identification, the International Consortium on Combating Wildlife Crime, p.95.

121 UNEP & INTERPOL, Strategic Report Environment, Peace and Security a Convergence of threats, 2016, p.15.

122 p.18-19, *ibid*.

123 World Bank, Overview of the Global Wildlife Programme, <https://www.worldbank.org/en/programs/global-wildlife-program/overview>.

124 Environmental Crime, WCO, <http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/environment-programme.aspx>.

125 Green Customs Initiative, Operation DEMETER VI: 131 Seizures in Illegal Transboundary Waste & Ozone Depleting Substances Trade, October 2020, <https://www.greencustoms.org/news/operation-demeter-vi-131-seizures-illegal-transboundary-waste-ozone-depleting-substances-trade>.

126 IUCN, About IUCN, <https://www.iucn.org/about>.

127 Green Customs Initiative, Who we are, <https://www.greencustoms.org/who-we-are>.

128 GCI, Fifteen Years of a Strong Partnership for Green Customs, December 2020, <https://www.greencustoms.org/news/fifteen-years-strong-partnership-green-customs>.