

### **Priorities for action**

Environmental crime relies on corruption to thrive and flourishes in places where individuals or groups exploit positions of authority for personal gain. To effectively combat corruption and environmental crime, the following priorities should therefore be established:

- 1. **Enhance transparency -** make information on anti-corruption efforts and environmental crime publicly available
- 2. Strengthen enforcement establish dedicated task forces and improve the use of anti-corruption and anti-money laundering laws and implement proportionate and dissuasive penalties to prevent repeat offences
- **3. Support civil society -** protect the role of civil society organisations (CSOs) and the media in exposing corruption and hold officials accountable
- **4. International cooperation -** promote cross-border collaboration to tackle grand corruption, recover assets linked to environmental crime
- **5. Public awareness -** increase public awareness of the impact of corruption on environmental crime and the importance of transparency and accountability.

These measures, if implemented effectively, can significantly reduce corruption and its facilitation of environmental crime, thereby protecting ecosystems and promoting sustainable development.

# Defining environmental crime

Environmental crime encompasses illegal activities which harm the environment and communities, leading to habitat destruction and biodiversity loss. EIA focuses on crimes such as illegal logging, wildlife trade, waste disposal and the trade in climate super pollutants.

These crimes are highly profitable, generating up to \$281 billion annually, owing largely to evasion tactics used by criminals and insufficient penalties implemented by prosecutors to dissuade repeat offenders. Often, a lack of political will to adequately resource law enforcement and customs authorities can hamper investigative capabilities to detect and prosecute criminals. As a result, the widespread nature of environmental crime significantly impacts our climate and ecosystems.

# **Corruption and environmental crime**

Corruption is a critical enabler of environmental crime, undermining law enforcement and justice. In the past 40 years of conducting investigations, EIA has consistently uncovered corruption. Corruption is particularly prevalent in illegal timber<sup>2</sup> and wildlife trades<sup>3</sup>, driven by the high value of certain species and international demand, and includes border officials turning a blind eye to the direct involvement of government officials in these crimes.

Forest crimes, of which corruption is a core enabler, leads to violence, arbitrary arrests and even murder. It affects indigenous peoples and local communities (IPLCs) who rely on forests for their homes, livelihoods, and medicines. They can be the subject to criminalisation for simply existing in forests that have been targeted for conversion, for example when logging permits are obtained through corrupt practices on land where IPLC rights had not yet been recognised.<sup>4</sup>

More broadly, corruption of this nature can lead to the destabilisation of governments, cause conflicts over natural resources, or exacerbate pre-existing conflicts, through the illegal trade of natural resources such as Burmese teak from Myanmar.<sup>5</sup>

# How corruption enables environmental crime

- · Bribery of officials to obtain land and forest access permits
- Bribery of wildlife and forest protection officials for access to protected species
- · Bribery of port, airport and customs officials to bypass security
- Bribery of border officials to smuggle illegal goods across borders
- Corruption within police and investigative units to avoid arrests and prosecution
- Collusion with financial institutions to facilitate large unflagged transactions

EIA urges governments to address environmental crime in conjunction with corruption, enhancing accountability and transparency to better protect the environment.

# EIA investigations: Case studies highlighting corruption

# 1. Corrupt customs officials assist Malaysian wildlife trafficker<sup>6</sup>

In September 2023, Malaysian national Teo Boon Ching was sentenced to 18 months in prison by a New York court for trafficking rhinoceros horns.

EIA's investigations revealed Teo's involvement in large-scale international trafficking and smuggling of rhinoceros horns, ivory and pangolin scales across Malaysia and Thailand.

Teo provided concealment and packing services to multiple criminal networks, facilitating the smuggling of illegal wildlife goods into Asia via Malaysian ports.

His operations benefitted significantly from his strong connections with customs officials at Johor Port. These officials allowed his clients to access the Customs Clearance Warehouse to verify goods upon arrival in Malaysia.

Teo's extensive operations, spanning more than two decades, illustrate how corruption can perpetuate illegal wildlife trafficking. Without the complicity of corrupt officials, his operations would have faced significant hurdles, highlighting the critical need for robust anticorruption measures to combat wildlife crime effectively.

#### 2. The 'Shadow President of Teak'7

EIA's investigations have consistently revealed pervasive corruption within the timber processing sector, from forest concession awards to the cross-border smuggling of luxury timbers.

A notable example is the case of Cheng Pui Chee, known as the 'Burmese teak kingpin' and the 'Shadow President of Teak'.

During two years of undercover investigation, EIA exposed how Cheng engaged in high-level corruption, colluding with senior Myanmar officials to defraud the state of timber revenues. His corrupt activities included multi-million dollar bribes and financing the foreign education of regime officials' children in exchange for preferential access to premium teak sold on international markets.

Cheng's actions, characterised by systematic and substantial bribery, highlight the extensive corruption within the timber industry and its far-reaching implications.

This case demonstrates how corruption at the highest levels can facilitate large-scale environmental crimes, emphasising the need for comprehensive anti-corruption strategies to protect natural resources and ensure fair economic practices.





#### 3. EIA exposes corruption in illegal HFC gas trade8

EIA has exposed how corruption appears to play a significant role in the illegal import of hydrofluorocarbon (HFC) gases into the EU.

HFCs are used widely in refrigeration and airconditioning and the illegal trade in them is generating huge profits for criminals smuggling non-quota HFCs into the EU.

EIA's investigative report *Europe's Most Chilling Crime* in 2021 and subsequent report *More Chilling Than Ever* in April 2024 revealed significant levels of trafficking of HFC gases, despite the worsening climate emergency.

The illegal trade in HFCs is often linked to financial crime, is regularly enabled by corruption and is often conducted in a manner resembling organised crime. The investigations found bribery and corruption played a significant role in the illegal import of HFCs in the EU, particularly in EU border countries such as Romania.

The investigations exposed how illegal traders are opportunistic and move to exploit markets with weak enforcement, which highlights how corruption in the form of accepting bribes by border customs agents can amplify illegal trade and organised criminal activities.



## Conclusion

These case studies demonstrate the intricate link between corruption and environmental crime. Whether through wildlife trafficking, illegal timber trade or illegal trade in climate super pollutants, corrupt practices enable and perpetuate these illicit activities, undermining conservation efforts and economic stability.

EIA continues to call for stronger anti-corruption measures and greater accountability to combat environmental crimes effectively. Addressing corruption is essential for disrupting criminal networks, protecting biodiversity and promoting sustainable development.

EIA's work highlights the urgent need for global cooperation and stringent enforcement to tackle both environmental crime and the corruption that facilitates it.

# Read more about EIA's work on corruption:

Rotten to the Core - How to tackle the corrupt networks facilitating wildlife and forest crime

State of Corruption - The top-level conspiracy behind the global trade in Myanmar's stolen teak

More Chilling Than Ever - Tackling Europe's ongoing illegal trade in HFC climate super pollutants

Europe's Most Chilling Crime - The illegal trade in HFC refrigerant gases

### References

- https://www.fatf-gafi.org/en/publications/Environmentalcrime/ Environmental-crime.html#:~:text=These%20activities%20 can%20have%20far,and%20how%20they%20are%20laundered
- Opening the Rosewood Pandora's Box EIA (eia-international. org)
- 3 Another day and another major elephant ivory trafficking incident – this shouldn't still be happening - EIA (eiainternational.org)
- 4 Why has it taken the killing of a Dayak villager for these palm oil sourcing companies to act? EIA (eia-international.org)
- US timber traders help support Myanmar's brutal junta by skirting laws to import illicit teak - EIA (eia-international.org)

- Jailing of international wildlife crime kingpin Teo Boon Ching is a body-blow to illegal trade - EIA (eia-international.org)
- 7. State of Corruption EIA (eia-international.org)
- 8. More Chilling Than Ever Tackling Europe's ongoing illegal trade in HFC climate super pollutants - EIA (eia-international. org)
- 9. Europe's Most Chilling Crime The illegal trade in HFC refrigerant gases EIA (eia-international.org)
- 10. More Chilling Than Ever Tackling Europe's ongoing illegal trade in HFC climate super pollutants - EİA (eia-international. org)

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### **About the EIA**

Since 1984, the Environmental Investigation Agency (EIA) has led efforts to combat environmental crime. Through undercover investigations, EIA exposes transnational wildlife, forest and climate crimes, particularly targeting elephants, pangolins, tigers, illegal logging for commodities and illegal trade in refrigerant gases. Additionally, EIA works to protect marine ecosystems by tackling plastic pollution, bycatch and the exploitation of marine mammals. To address climate change, EIA works to help enforce agreements on pollutants such as ozone-depleting substances, hydrofluorocarbons and methane, while promoting sustainable cooling and alternatives to fossil fuels.

This publication is made possible by the support of the American People through the United States Agency for International Development (USAID). The contents of this publication do not necessarily reflect the views of USAID or the United States Government. Resources were provided through the Countering Nature Crime program.

