



eia environmental
investigation
agency

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CRIMES THAT AFFECT THE ENVIRONMENT

STILL a critical threat to our future

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ABOUT EIA

The Environmental Investigation Agency (EIA) investigates and campaigns against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops. We work to avert climate catastrophe by investigating the criminal trade in refrigerant gases, strengthening and enforcing regional and international agreements that tackle fossil fuels and climate super-pollutants, including ozone-depleting substances, hydrofluorocarbons and methane, and promoting sustainable cooling. We seek to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises.

EIA UK

62-63 Upper Street,
London N1 0NY UK
T: +44 (0) 20 7354 7960
E: ukinfo@eia-international.org
eia-international.org

Environmental Investigation Agency UK

UK Charity Number: 1182208
Company Number: 07752350
Registered in England and Wales



CONTENTS



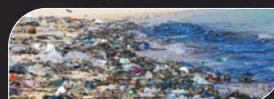
Glossary
PAGE 4



Executive Summary
PAGE 6



Recommendations
PAGE 8



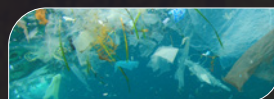
Introduction and Context
PAGE 10



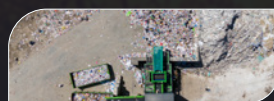
The landscape of crimes that affect the environment
PAGE 12



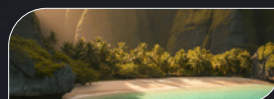
Crimes that affect the environment and UNTOC
PAGE 28



Impediments and challenges
PAGE 32



Conclusion
PAGE 38



References
PAGE 40



**CRIMES THAT
AFFECT THE
ENVIRONMENT
ARE PUSHING
EARTH
BEYOND ITS
PLANETARY
LIMITS.**



GLOSSARY

CAE Crimes that Affect the Environment	EUTR EU Timber Regulation
CCPCJ UN Commission on Crime Prevention and Criminal Justice	EUROPOL European Union Agency for Law Enforcement Cooperation
CITES Convention on International Trade in Endangered Species of Wild Fauna and Flora	F-gas Fluorinated gas
COVID-19 Coronavirus disease 2019	FAO Food and Agriculture Organisation (United Nations)
DNA Deoxyribonucleic acid	FIU Financial Intelligence Unit
EIA Environmental Investigation Agency (UK)	FPIC Free, Prior and Informed Consent
EPR Extended Producer Responsibility	GI-TOC Global Initiative Against Transnational Organized Crime
ETIS Elephant Trade Information System	HFC(s) Hydrofluorocarbons
EU European Union	HFC-23 A specific potent hydrofluorocarbon byproduct gas



IEG
Open-ended Intergovernmental Expert Group (on CAE and UNTOC)

INTERPOL
International Criminal Police Organisation

IUU
Illegal, Unreported and Unregulated (fishing)

MLA
Mutual Legal Assistance

MTE
Myanmar Timber Enterprise

NGO
Non-governmental organisation

ODS
Ozone-depleting substances

REDD+
Reducing Emissions from Deforestation and Forest Degradation (and the role of conservation, sustainable management of forests and enhancement of carbon stocks)

Rio+20
UN Conference on Sustainable Development (2012)

SDG
Sustainable Development Goal

tCO₂e
Tonnes of carbon dioxide equivalent

UN
United Nations

UNCAC
UN Convention Against Corruption

UNEA
UN Environment Assembly

UNGA
UN General Assembly

UNODC
United Nations Office on Drugs and Crime

UNTOC UN
Convention against Transnational Organized Crime

VAT
Value Added Tax

WCO
World Customs Organization

EXECUTIVE SUMMARY

As an organisation that has spent more than four decades investigating and combating environmental crime and abuse across all three pillars of the triple planetary crisis – climate, biodiversity and pollution – the Environmental Investigation Agency (EIA) is uniquely positioned to speak to both the scale of the threat and the response required to address it.

This report revisits our seminal 2008 publication, *Environmental Crime – A Threat to Our Future*, the first to draw together the combined impact of multiple environmental crime types and the coordinated global response they demanded.

Nearly two decades on, that call for urgent action has gone substantially unheeded. Environmental crime has grown more sophisticated, more lucrative and more damaging. Many of the structural weaknesses identified in 2008 – fragmented legislation, weak deterrence, limited cross-border cooperation and insufficient political will – persist today, even as the consequences of inaction have become progressively harder and, in some cases, impossible to reverse.

In the last decade, but substantially since 2020, governments and international institutions have increasingly recognised the scale and complexity of “environmental crimes”, noting that a wide range of acts have negative, harmful impacts on the environment, economies, security and human health. Furthermore, many related offences extend beyond traditional environmental law and include crimes such as corruption, fraud, violence and financial crimes. Consequently, at meetings of INTERPOL, UNEA, UNGA, and UNTOC, the term “Crimes that Affect the Environment (CAE)” is now broadly accepted and will be used in this report.

In this report, we aim to capture the breadth of environmental issues and argue they must be treated holistically, not as isolated regulatory failures, but as interconnected expressions of transnational organised crime driving the triple planetary crisis.

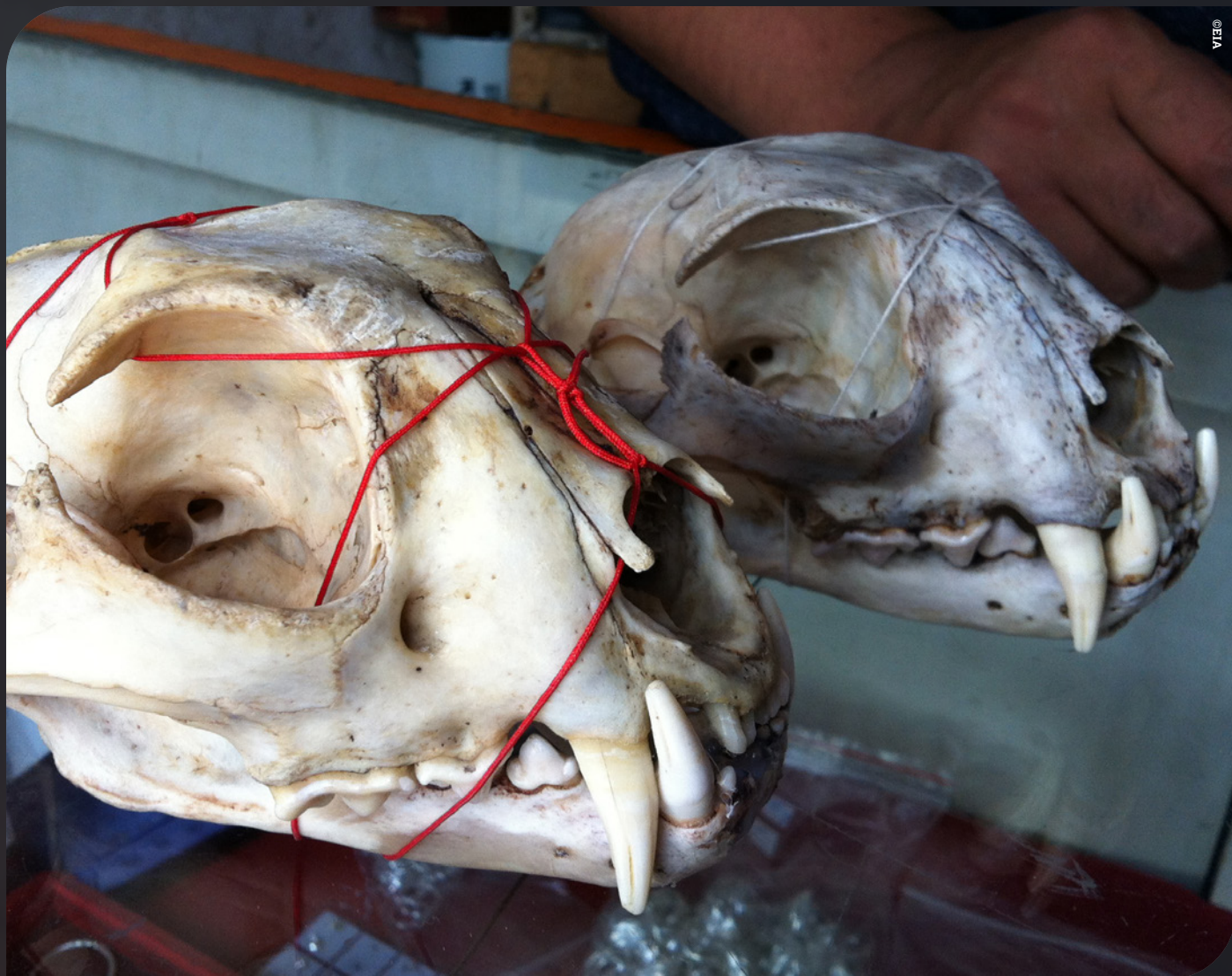
Climate crime has emerged as a category of growing urgency. The illegal trade in hydrofluorocarbon (HFC) refrigerant gases involves sophisticated criminal



networks evading customs duties and VAT across Europe and beyond, with estimated fiscal losses of approximately €77 million per year. Carbon markets, meanwhile, have been systematically exploited through fraudulent credit schemes and perverse incentives – including billion-euro frauds documented by EIA – which undermine the very climate frameworks they are meant to support.

Pollution crime – encompassing the unlawful release of contaminants into air, water and land – is increasingly recognised, not as minor regulatory non-compliance but as serious criminality with irreversible consequences for ecosystems and public health. It frequently flows from other CAE categories, as illegal dumping, uncontrolled discharges, and emissions evasion are often the downstream consequence of criminal activity elsewhere in the supply chain.

Waste crime is among the fastest-growing categories of CAE, characterised by enforcement bodies as low-risk and high-profit. It ranges from domestic fraudulent recycling schemes worth an estimated £50 million per year in the UK for plastic packaging recovery note fraud alone, to transnational shipments of plastic waste falsely labelled as recyclable and openly dumped, burned or otherwise mismanaged in countries all over the world.



Illicit mining and forest crime are increasingly inseparable. Across the Amazon, Congo Basin and South-East Asia, illegal mineral extraction is now among the fastest-growing drivers of deforestation, mercury contamination and violence against forest-dependent communities. Shared criminal infrastructure, documentation fraud and corruption bind these crime types together, while the revenues can directly fund armed conflict, as the case of Myanmar's military junta illustrates starkly.

Illegal fishing — estimated at 15-30 per cent of global annual catches and worth up to \$23.5 billion a year — undermines fisheries management, deprives coastal states of revenue and fuels wider criminal networks linked to labour exploitation and human trafficking. Bycatch from illegal operations continues to drive species, including the vaquita, the world's most critically endangered marine mammal, towards extinction.

Wildlife crime remains a thriving global industry, with approximately 4,000 species recorded in trafficking data between 2015-21. Beyond the ecological harm it carries serious public health risks, with more than 70 per cent of emerging zoonotic diseases linked to wildlife. Corruption and the persistent failure to pursue high-level prosecutions continue to make it a high-reward, low-risk enterprise.

Across all of these crime types, common threads emerge: profit incentives that dwarf enforcement risks; corruption as a structural enabler; opaque supply chains allowing illegal commodities to enter legitimate markets; and a systematic failure to treat CAE with the seriousness required under existing frameworks, including the UN Convention against Transnational Organised Crime (UNTOC).

This is not a failure of available tools — the legal frameworks and cooperation mechanisms needed to act already exist. The failure has been one of political will, resourcing and coordination.

Lastly, this report makes recommendations to address the problem, focused on operationalising UNTOC more effectively, strengthening cross-border enforcement and building the political commitment to treat CAE as the global security threat they have always been.



Above: The lucrative trade in Asian big cat parts and derivatives generates profits for transnational organised criminal networks



Above, left: Global wildlife populations have been decimated by poaching and trafficking



RECOMMENDATIONS STRENGTHENING THE GLOBAL RESPONSE

- **Recognise CAE as serious organised crimes – in law and in practice.** Countries should unequivocally classify CAE as serious crimes, with determinations guided by environmental, economic and social harm rather than domestic sentencing thresholds alone. National legislation should be aligned with international standards to enable effective investigation, prosecution and cross-border cooperation, closing the gaps that allow criminal networks to treat CAE as low-risk, high-reward activities.
- **Operationalise UNTOC fully in relation to CAE.** The tools required to tackle organised CAE already exist under the UN Convention against Transnational Organised Crime. Countries should translate existing UNTOC commitments into concrete legislative, institutional and enforcement action – including through mutual legal assistance, joint investigations and extradition – ensuring that networks committing CAE cannot exploit jurisdictional gaps between source, transit and destination countries.
- **Strengthen whole-of-government coordination and international enforcement cooperation.** Effective responses require environmental authorities, organised crime units, financial intelligence units and anti-corruption bodies to work collaboratively, share intelligence and pursue cases jointly. At the international level, countries should make full use of established mechanisms – including INTERPOL and World Customs Organization channels – to support coordinated cross-border enforcement action.
- **Integrate financial investigation and asset recovery into every serious case.** CAE are profit-driven and enforcement must be too. Countries should make systematic use of asset-seizure, confiscation and proceeds-of-crime frameworks to disrupt financial incentives and pursue the organisers and beneficiaries who too often evade accountability while low-level actors are prosecuted. Financial intelligence units should be integrated into CAE responses as a matter of course, not exception.
- **Treat corruption as a structural priority, not a side issue.** Corruption is the connective tissue of organised CAE, enabling illegal access to resources, suppressing enforcement and laundering illegal commodities into legitimate markets. Countries should strengthen transparency, oversight and accountability in permitting, licensing and trade systems and robustly implement existing anti-corruption frameworks, including the UN Convention against Corruption (UNCAC), in the context of CAE.
- **Build accountability into international commitments, including through an additional protocol to UNTOC.** Implementation, monitoring and compliance mechanisms must be strengthened to ensure political commitments translate into measurable outcomes. EIA is supportive of an additional protocol to UNTOC dedicated to CAE, but with clear conditions. Any such protocol must cover the full spectrum of crimes driving climate change, biodiversity loss and pollution, rather than a narrow subset, and should include robust accountability mechanisms. A protocol which is weakly enforced risks legitimising inaction rather than driving it. The case for a protocol is strong and the conditions for its success must be built in from the outset.





Mismanaged plastic waste has the potential to leak into the environment and impact ecosystems, local communities and fisheries sustainability

CHAPTER 1

INTRODUCTION AND CONTEXT

In 2008, EIA released its seminal report *Environmental Crime – A Threat to Our Future*,¹ the first to draw together the combined impact of several environmental crime types, the threats they posed and what needed to be done to address them.

We were determined to direct the spotlight of organised crime towards a crime type that had long been neglected. The conclusion to that report was unequivocal – without urgent, coordinated global action, environmental crime would continue to flourish, threatening ecosystems, wild species and communities worldwide.

Nearly two decades on, the focus on some CAE have changed beyond recognition, yet our analysis of the problem is disturbing and indicates we still have far to go to reduce this threat to the future of life on Earth.



can inadvertently provide cover for illegal activity, particularly where supply chain transparency and traceability mechanisms are weak.

Together, these enabling conditions create a permissive environment in which CAE can flourish and evolve.

CAE have always been one of the few truly time-critical forms of organised crime and the lack of pace from countries has only intensified the need for a more urgent response.

Growing global competition for natural resources, population pressures, climate change and geopolitical instability are increasing both the value of environmental commodities and the incentives to exploit them. As legitimate supply struggles to meet demand, criminal networks are increasingly well-positioned to fill the gap, often with fewer costs and lower risks than lawful operators.

CAE intersect with broader socio-economic and security challenges. As EIA highlighted in 2008, it continues to undermine sustainable development, weakens governance, fuels corruption, deprives states of revenue, exacerbates inequality and threatens the livelihoods of vulnerable communities.

In some regions, proceeds from CAE contribute to armed conflict and the diversification of organised crime, further destabilising already fragile structures.

Given the scale of environmental degradation and biodiversity loss experienced globally, the consequences of inaction to date are in many cases irreversible and we now enter a period of damage limitation.

If CAE are indeed the most serious transnational threats facing the international community, then the response must be proportionate. This requires stronger political commitment, coordinated international enforcement, improved legislation and sustained investment in prevention and capacity-building.

Without such a commensurate response, CAE will continue to expand, undermining global security and human wellbeing.

This report revisits the warnings set out in 2008, assessing how CAE have evolved and, critically, how far government and international responses have fallen short. It underscores that CAE remain a serious and escalating threat to biodiversity, ecosystems and human wellbeing, including several crime types that continue to receive insufficient political and enforcement attention.

We argue that CAE must now be treated unequivocally as a priority form of organised crime and call on governments to move beyond recognition of the problem towards sustained commitment, stronger enforcement and coordinated international action.

The following chapters examine key CAE trends, persistent gaps in response and the urgent steps required if the international community is to avert further irreversible harm.

For decades, environmentalists, scientists and policy-makers have been highlighting the need to protect natural habitats, prevent deforestation, tackle climate change and preserve biodiversity – and for 20 years or more, many have recognised the role of criminality as a driver of these crimes.

CAE at their most serious are forms of transnational organised crime perpetrated by diverse networks. These crimes are inextricably linked to each other and to other forms and characteristics of organised crime such as trafficking in people and narcotics, violence, corruption, illicit financial flows and money laundering.

CAE do not occur in isolation but are facilitated by a complex combination of economic incentives, governance weaknesses and global market dynamics. Both 'push' and 'pull' factors shape these crimes. On the supply side, poverty, limited livelihood opportunities, weak land tenure arrangements and political instability can push individuals and communities towards CAE, while on the demand side, high global demand for natural resources, wildlife, timber, minerals and waste disposal creates lucrative markets attracting organised criminal networks.

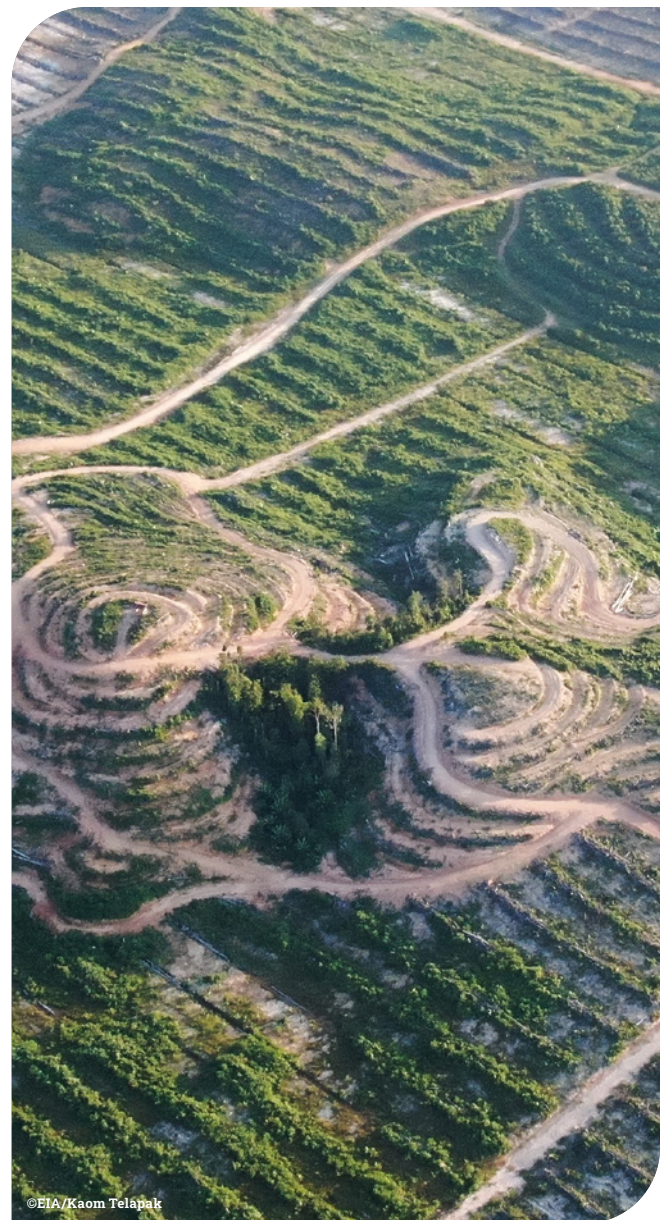
Weak regulatory frameworks and inconsistent enforcement further enable these activities. In many jurisdictions, environmental legislation remains fragmented, penalties are insufficient to deter offenders and many enforcement agencies still lack the resources, training or specialist expertise needed to investigate sophisticated criminal networks. Corruption – whether in permitting, the implementation of import or export regulations, law enforcement or criminal justice processes – continues to act as a powerful facilitator, allowing illegal commodities to enter legitimate supply chains with relative ease.²

Globalisation has also lowered barriers to CAE. Advances in transport, communication technologies and financial systems allow criminal groups to operate transnationally, diversify their activities and conceal illicit profits through complex financial flows. At the same time, legal markets



CHAPTER 2

THE LANDSCAPE OF CRIMES THAT AFFECT THE ENVIRONMENT



Crimes that Affect the Environment are invariably a global convergence of crime-types linked by profit and corruption, and perpetrated by organised criminal networks.

CAE are not a single entity. Few collective terms in the field of international law and policy encompass so many distinct and disparate offences, from the poaching of wildlife and industrial-scale trafficking of timber to the illegal dumping of hazardous waste and the plunder of precious minerals.

This breadth reflects the true scale of harm inflicted on the natural world, but also make CAE uniquely difficult to define, legislate against and enforce. In this chapter, we examine several of the principal forms of CAE, exploring how each contributes to the widely acknowledged triple planetary crisis of climate change, biodiversity loss and pollution and why tackling them demands both specificity and a joined-up global response.



2.1 CLIMATE CRIME

ILLEGAL TRADE IN REFRIGERANT GASES

Hydrofluorocarbons (HFCs) belong to a group of synthetic fluorinated gases (F-gases) widely used in refrigeration and air-conditioning. Although they do not damage the ozone layer, HFCs are extremely potent greenhouse gases and their use is being phased down globally under the Montreal Protocol.

Experience from earlier phase-outs of ozone-depleting substances (ODS), as well as from the early HFC phase-out in Europe, shows these transitions can unintentionally create opportunities for large-scale illegal trade – when legal supply is restricted more quickly in some countries than others, market distortions emerge that can be exploited by criminals.

Under the Montreal Protocol, industrialised countries are required to reduce HFC consumption more rapidly than developing countries. As a result, while demand in industrialised markets remains high, legal supply is sharply curtailed. At the same time, production in developing countries has continued to grow, creating a surplus of cheaper HFCs. These conditions have led to significant price differences between markets.

Such regional price disparities create strong incentives for illegal trade. Driven by high profit margins and uneven enforcement, organised criminal networks have become increasingly involved in the illicit trade of HFCs. Online marketplaces, which provide access to large audiences and efficient distribution channels, have further facilitated the sale of illegal refrigerant gases.

In the European Union, ambitious HFC-reduction measures were introduced from 2015 onwards through a quota system progressively restricting the amount of HFCs that could be placed on the market. Following these reductions, a wave of illegal refrigerant trade emerged with smugglers adopting a variety of methods, including misdeclaration of goods, concealment, abuse of transit procedures and false labelling of HFCs as legal alternatives.

EIA's unique ongoing investigations have highlighted both the sophistication of these methods and the scale of the profits involved. Illegal F-gas trade in Europe is commonly carried out by organised criminal networks which also systematically evade the payment of taxes and customs duties. In 2025, EUROPOL highlighted the role of criminal F-gas smuggling networks in its EU Serious and Organised Crime threat assessment.³

According to EIA estimates, illegal trade in HFCs across Europe between 2018-20 may have resulted in losses of approximately €77 million per year in unpaid Value Added Tax (VAT) and customs duties.⁴ Recent enforcement actions illustrate both the scale of these fiscal losses and the importance of financial investigations in addressing them.

In March 2025, Romania's Directorate General for Anti-Fiscal Fraud prosecuted two companies for damages of approximately €2 million arising from the sale of F-gases without proper taxation.⁵

Similarly, in October 2025 an investigation by the Spanish tax agency led to the seizure of 53 tonnes of refrigerant and nearly €1 million in cash.⁶



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CARBON MARKET FRAUDS AND ABUSES

Carbon markets are intended to reduce greenhouse gas emissions through trade in carbon credits, with each credit representing one tonne of carbon dioxide equivalent (tCO₂e) avoided or removed from the atmosphere.

Both compliance markets (which are legally mandated) and voluntary markets (which are largely unregulated) allow entities to 'offset' their emissions by purchasing credits that represent an equivalent quantity of emissions claimed to be mitigated elsewhere.

But during the past decade, many carbon market projects have been exposed for failing to deliver the emissions reductions they promised. Indeed, a 2023 study found that more than 90 per cent of rainforest-based credits issued by Verra, the world's largest carbon market registry, were likely based on exaggerated deforestation threats.⁷

Compounding this issue, forest-based credits have also been identified as a threat to Indigenous Peoples and local communities, with several cases citing human rights violations, even under UN-endorsed programmes such as REDD+.⁸

With very limited oversight, significant cases of fraud have also emerged. The Beijing Karbon scam, exposed in 2024, is one such example. Beijing Karbon purported to fund the building of new methane-capture and gas-flare-reduction installations, many of which in fact predated the crediting programme. At least 16 projects were suspected of fraud, with the total value of credits issued by 2024 estimated to have reached as much as €1billion.⁹

Beyond fraudulent activity, carbon markets also risk creating perverse incentives which can serve to undermine otherwise effective climate mitigation efforts. For example, the HFC-23 scandal under the Clean Development Mechanism saw chemical firms in China and India overproduce byproduct HFC-23 (a potent greenhouse gas) simply to destroy it and so profit from carbon credits without achieving any real emissions cuts.¹⁰

EIA's concerns about how these and other F-gas credits could undermine the Montreal Protocol, the world's most successful environmental treaty, are explored in detail in our 2024 briefing.¹¹



Above: Palm oil plantation in East Kalimantan, Indonesia



Plastic waste from an adjacent fruit and veg agriplastic site dumped on the coast and in the ocean in Murcia, Spain

2.2 POLLUTION CRIME

Pollution crime is widely recognised as a core category of CAE, encompassing the unlawful release of substances into air, water or land in violation of environmental law.¹²

International organisations and enforcement bodies increasingly treat pollution crime not as minor regulatory non-compliance but as serious environmental criminality capable of inflicting significant and sometimes irreversible harm in breach of the regulatory limits designed to protect ecosystems and human health.¹³

Pollution crimes may arise from deliberate acts, reckless disregard of environmental obligations or systematic evasion of regulatory controls and include illegal industrial discharges into waterways, unlawful emissions exceeding permitted air quality limits, deliberate dumping of toxic substances and bypassing pollution-control equipment to reduce operating costs.

In some cases, pollution offences are committed through falsified monitoring data, manipulation of reporting systems or concealment of emissions from regulatory authorities.

Pollution crimes are often financially motivated, particularly where operators seek to avoid the costs associated with lawful treatment, emission control technologies or environmental compliance.¹⁴

A range of environmental offences, such as waste trafficking, illegal mining, unlawful logging and illicit trade in climate gases, can generate pollution as a direct or downstream consequence. In many cases, what begins as one category of CAE evolves into an additional pollution offence when contaminants enter soil or water or where uncontrolled emissions breach pollution laws.

These overlaps demonstrate that CAE are legally distinct but functionally interconnected. The same conduct may engage multiple legal regimes and environmental harm often emerges as the cumulative outcome of governance failures across resource-extraction, production, waste management and emissions-control systems.

Recognising this convergence is essential for enforcement strategies to move beyond isolated offence types and instead address the broader criminal markets and systemic vulnerabilities allowing environmental harm to occur.

At the international level, pollution control is governed through a combination of multilateral environmental agreements addressing specific media or substances, such as marine pollution conventions, transboundary air pollution regimes and hazardous chemicals treaties.¹⁵ While these instruments vary in scope, they share a common objective – preventing or minimising releases of harmful substances and requiring countries to implement domestic enforcement measures.



The impacts of environmental harms are often transboundary in nature and can reach far beyond the initial point of harm.

Unlike the Basel Convention, which explicitly requires the criminalisation of illegal waste trafficking, many pollution treaties defer to domestic legal systems to determine the nature of sanctions. Nevertheless, the harmful consequences of pollution offences have led many countries to treat serious breaches as criminal under national law.

Pollution crime frequently intersects with corporate misconduct. Large-scale industrial facilities may engage in unlawful discharges to reduce operational costs, particularly where regulatory oversight is weak or inspection capacity is limited. Enforcement bodies have documented cases involving deliberate bypassing of wastewater treatment systems, manipulation of emissions-monitoring equipment and unlawful disposal of hazardous effluents. These offences may be embedded within otherwise legitimate business operations, illustrating how CAE can coexist with formal economic activity.

Law enforcement agencies increasingly recognise pollution crime as part of a broader CAE market. EUROPOL categorises waste and pollution crimes as a major environmental threat area, noting that regulatory complexity and uneven enforcement create opportunities for exploitation.¹⁶ INTERPOL has similarly highlighted industrial pollution, illegal dumping of hazardous substances and unlawful discharges as forms of CAE linked to financial gain and corporate misconduct.¹⁷

In this sense, pollution crime shares structural characteristics with other CAE, including profit incentives, regulatory fragmentation and cross-border implications as pollutants move through shared ecosystems such as rivers, seas or air basins.

Pollution crime also raises acute public health concerns, with unlawful emissions and discharges contaminating drinking water, degrading air quality and exposing communities to toxic substances. Unlike offences where illegality may be evident through documentation discrepancies, pollution crime often requires technical monitoring, scientific evidence and regulatory inspection to establish breaches.

This technical dimension can create evidentiary challenges which complicate enforcement.

Despite these challenges, many jurisdictions criminalise serious pollution offences, particularly where conduct is intentional, reckless or results in substantial harm. Criminal sanctions may include fines, imprisonment, corporate liability and, in some systems, director disqualification.¹⁸

Pollution crime is a systemic governance challenge linked to industrial activity, corporate compliance failures and regulatory oversight gaps. Effective responses require coordination between environmental regulators, criminal justice authorities and, in cross-border contexts, international enforcement cooperation.

2.3 WASTE CRIME

Waste crime is widely recognised as a significant and growing form of CAE, encompassing the illegal generation, handling, transport, trade and disposal of waste in breach of environmental law.

International organisations and enforcement bodies increasingly treat waste crime not as isolated regulatory non-compliance but as a profit-driven form of criminality exploiting structural weaknesses.

Crimes in the waste sector are both CAE and forms of white-collar crime, facilitated by the complexity of waste collection and management systems and the opportunities these systems create for concealment and fraud.¹⁹ Waste crimes are often a 'low-risk, high-profit' crime area with a growing number of violations.²⁰

Waste crime can manifest across the entire lifecycle of waste. In practice, it includes illegal dumping and uncontrolled disposal, unauthorised treatment or storage, operation of unlicensed waste facilities and the deliberate evasion of waste management obligations. It also commonly involves falsification of documentation, misclassification of hazardous waste as non-hazardous, sham recovery operations and concealment of illegal movements within legitimate commercial flows.²¹

INTERPOL has similarly highlighted the broader pattern that CAE, including waste trafficking, are increasingly linked to organised criminal networks and associated offences such as fraud and corruption.²²

At the international level, the core legal framework shaping the definition and governance of transboundary waste crime is the Basel Convention,²³ which controls the movement of hazardous wastes and certain other controlled wastes across borders to ensure its environmentally sound management.²⁴ "Illegal traffic" is defined as any transboundary movement carried out without notification, without consent, with falsified documentation or in a manner that results in deliberate disposal contrary to the Convention's provisions.²⁵ Importantly, parties are required to treat such illegal traffic as criminal under national law.

The Basel regime has become increasingly relevant to contemporary waste crime as controlled waste streams have grown. Plastic waste has been a prominent focus due to persistent evidence of misdeclaration, contamination and environmentally harmful disposal in importing countries, with enforcement bodies documenting shifts in illegal plastic waste trade and associated criminal methods.²⁶

The broader point for a CAE analysis is that the Basel Convention does not treat transboundary waste movements as a purely administrative matter but instead explicitly recognises that unlawful shipments can constitute a criminal problem requiring preventive and punitive measures by states.

While transboundary trafficking is a central concern, waste crime also encompasses domestic criminality.



At Felixstowe Port, the Environment Agency conducts an inspection of a container of plastic waste for export



©Caner Özkan / Greenpeace



UK supermarket plastic found being burned at a waste dump in Türkiye



Many countries prohibit illegal dumping, unauthorised waste treatment and operation of unlicensed facilities, with sanctions that may include criminal penalties. At the domestic level, waste offences commonly relate to illegal storage, illegal dumping or fly-tipping and deliberate breaches at waste sites²⁷ such as uncontrolled burning and evasion of environmental safeguards.

This dual nature of waste crime, spanning both domestic and transboundary conduct, is reflected in regional approaches that embed waste-related offences within environmental criminal law while connecting them to technical regulatory frameworks.

The EU's recently revised Environmental Crime Directive explicitly recognises serious violations of waste law as criminal offences,²⁸ while the revised Waste Shipment Regulation provides detailed operational obligations around classifications of waste, traceability and lawful movement.²⁹ The combined effect is to treat serious breaches as a recognised category of CAE requiring criminal law tools alongside regulatory oversight.

Waste crime also intersects with, but is distinct from, pollution offences. Pollution crime typically focuses on the unlawful release of contaminants into air, water or land and on harm measured through environmental quality and emissions standards (see section 2.2 for more).

Waste crime focuses on the unlawful handling, movement and management of materials classified as waste and often targets the conduct which creates conditions for pollution. The two converge in practice because illegal dumping, burning or improper disposal frequently results in environmental contamination. However, waste offences can also be pursued on the basis of breaching waste governance controls which exist precisely to prevent downstream pollution and harm. This distinction between the two still has a linked threat area, which nonetheless treats waste as a specific criminal market characterised by high profit and comparatively low risk.

Across operational assessments and enforcement practice, waste crime is therefore understood as a systemic governance challenge at the intersection of environmental protection, trade regulation and criminal law.

The lucrative market and associated broader criminal methods support the view that waste crime merits specific recognition and targeted responses in international CAE frameworks, including within UNODC workstreams on crimes that affect the environment.



Above: Textile waste in Dandora landfill next to a river in Nairobi, Kenya



CASE STUDY: PLASTIC WASTE AS A FORM OF WASTE CRIME

Plastic waste illustrates how waste crime operates not as isolated illegality but as a market shaped by profit incentives, regulatory gaps and enforcement weaknesses.

EIA investigations have documented criminal conduct occurring at multiple points along the plastic waste value chain, from collection and sorting to export and final disposal.³⁰

Plastic waste crime is not confined to international shipments; in the UK, EIA found that domestic EPR are subject to about £50 million worth of fraud a year.³¹ This is through the misuse of recycling evidence notes and false reporting of recycling activities to generate financial gain, which distorts legitimate markets and undermines trust in compliance systems. At the same time, illegal fly-tipping and unauthorised waste handling remain persistent domestic offences, with plastic packaging and mixed plastic waste frequently appearing in illegal dumps to avoid costs associated with lawful treatment and disposal.

At the transnational level, plastic waste exports declared as recyclable material have repeatedly been found to be contaminated, misclassified or falsely described.³² EIA investigations have shown that shipments labelled for recycling were, in some cases,

processed in unlicensed facilities, openly burnt or dumped. These operations have involved networks of brokers, exporters, transport operators and local intermediaries, demonstrating organised and multi-actor dimensions.

In some contexts, informal processing sectors have relied on exploitative labour conditions, including child workers, while contaminated residues were discarded into local environments.

Common enabling factors are evident across all stages. First, plastic waste generates economic opportunity through cost differentials between lawful and unlawful disposal. Second, fragmented oversight and limited inspection capacity create space for misdeclaration and concealment. Third, inadequate transparency and traceability systems allow waste to move through complex supply chains with limited verification of final outcomes.

In both domestic and export contexts, a lack of resources for inspection, data-sharing and enforcement has facilitated persistent non-compliance.

Plastic waste crime demonstrates how illegality can occur at multiple points within a formally regulated system – fraud within compliance schemes, illegal collection and dumping, falsified export documentation and unlawful disposal abroad – and how environmental harm is often the downstream result of upstream governance failures.



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2.4 ILLEGAL FISHING

ILLEGAL, UNREPORTED AND UNREGULATED FISHING

Illegal, unreported and unregulated (IUU) fishing encompasses a wide variety of activities and is found in all types of fisheries, occurring both on the high seas and in national waters.³³

IUU fishing is widely recognised as a form of CAE because it involves the deliberate exploitation of marine wildlife in violation of national and international laws. It undermines the conservation of fish populations, the integrity of responsible fisheries management and legitimate fishing activities, jeopardises food and economic security, benefits transnational crime and causes loss of economic value for coastal states.³⁴

Furthermore, it contributes directly to overfishing and non-target biodiversity loss and fuels wider criminal networks, including those linked to labour and human rights abuses.

Due to the illicit nature of IUU fishing, the size of this problem can only be roughly estimated. According to the UN Food and Agriculture Organization (FAO), it represents 15-30 per cent of global annual catches, with an estimated value of \$10-23.5 billion a year.³⁵

Illicit practices often associated with IUU include transshipments, the use of flags of convenience or non-compliance, the use of ports of convenience, the deactivation of vessel monitoring or automatic vessel identification and tracking systems, the use of complex ownership networks, fraudulent vessel documents and human rights violations on board.³⁶

The range of crimes is not limited to the falsification of fishing licences, tax evasion or money laundering, but also includes serious crimes such as human trafficking, arms trafficking and piracy.³⁷

Above: A group of trawlers fishing illegally in a marine protected area

Above, right: Bottlenose dolphin entangled in a fishing net

FISHERIES BYCATCH

With regards to marine conservation, IUU fishing acts as a catalyst for biodiversity loss, allowing populations to be fished beyond sustainable limits to the risk of collapse and having significant impacts on non-target species, including endangered, threatened and protected species.

Specific examples of IUU fishing in relation to bycatch of whales, dolphins and porpoises (collectively 'cetaceans') exist around the world. In Europe, IUU fishing is a problem throughout the Mediterranean³⁸ and north-east Atlantic.³⁹

A significant amount of cetacean bycatch in the Black Sea and the Sea of Azov occurs in IUU fishing operations during the closed turbot fishing season, where the months of highest bycatch also coincide with the porpoise reproductive season.⁴⁰ Cetacean carcasses in early stages of decomposition with evidence of bycatch were observed on the Bulgarian coastline when the turbot fishing ban was effective, indicating the existence of illegal fishing operations.⁴¹ Porpoise bycatch coincides with IUU fishing for sturgeon, shad and turbot.⁴²

The use of illegal drift nets is well described since the ban on them was implemented in 2002,⁴³ particularly in the Mediterranean.^{44,45,46} Evidence also exists of sperm whales being bycaught in pelagic driftnets in Algeria, Italy, Morocco and Turkey.^{47,48}

Given the scale of IUU fishing around the world, bycatch levels are likely to be considerably higher than predicted when using data from legal fishing operations.

IUU does not just threaten the welfare and conservation of marine species, it contributes directly to the overexploitation of commercially important fish populations and marine resources upon which coastal communities rely, with long-term impacts on livelihoods, human rights and tourism.

By agreeing to the UN's Sustainable Development Goal 14.4 to end IUU fishing and overfishing by 2020, countries acknowledged the importance of this issue. However, the three main drivers – economic incentives which make IUU fishing a low-risk, high-profit activity, weak governance and barriers to enforcement caused by lack of political will, lack of enforcement capacity and sometimes corruption⁴⁹ – have thus far limited tangible progress towards this goal.

CASE STUDY: TOTOABA AND VAQUITA

Illegal fishing of protected totoaba in Mexico's Gulf of California and the species' subsequent trafficking and retail as part of transnational organised crime are responsible for the rapid decline of vaquita porpoises, the world's most endangered marine mammal.

Vaquitas are ensnared in illegal gillnets set to catch totoaba and it is estimated as few as 10 individuals remain after a decade of relentless totoaba poaching and trade.

The illegal market in China for dried totoaba swim bladders, or maw, remains active, with a thriving opportunistic network of traders and consumers willing to participate. Increasingly, the international trade in the maws of other fish species, particularly croakers, is problematic for both the fish populations involved, which are largely unmanaged, and for non-target species, including cetaceans, many populations of which are already facing a high risk of extinction.

EIA has conducted investigations into the illegal totoaba trade in Hong Kong and China, revealing that the wholesale centre of the totoaba maw trade is Shantou, in China's Guangdong Province.

From Shantou, totoaba maws are distributed to key retail centres where consumers are affluent and can afford the high prices. We identified several shops openly selling totoaba maws and one trader claimed to have as many as 700 in stock.

Based on the leads we provided, Chinese authorities in 2018 arrested 16 individuals for the transnational smuggling of totoaba maws and seized more than 2,500 pieces of maw. Eleven of the suspects were brought to court for trial in 2019. The gang leader was suspected of smuggling nearly 16,000 pieces of totoaba maw since 2015, equating to more than \$100 million.

Research conducted by EIA on social media platforms and online, presented in our 2024 report, revealed that the market in China for dried totoaba maws on popular social media channels remains active and is increasing on some platforms, particularly in China.⁵⁰



2.5 FOREST CRIME

Forests are critical for sustaining a healthy planet, yet the misuse of forests continues at an alarming rate.⁵¹ As forests are lost and critical ecological tipping points are breached, cascading impacts will emerge, threatening food security, disrupting climate regulation and triggering national and international security threats on a scale not seen before.⁵² Consequently, conflicts may increase as nations or illegal groups vie for dwindling natural resources.⁵³

Globally, between 1990-2020, 178 million hectares of forests were lost.⁵⁴ Deforestation and land conversion are key drivers of global forest loss, with the tropical rainforests of the Amazon, Central Africa and South-East Asia regions the worst affected.⁵⁵ A significant proportion of this loss can be attributed to forest crimes, such as illegal logging, and the enablers of forest crime, such as corruption, fraud and money laundering.⁵⁶

Forests, in particular old growth, are a target for illegal actors as they possess lucrative natural resources such as high value timber species, land speculation and conversion for agricultural commodities,⁵⁷ as well as opportunities for illegal mining. For example, illegally felled timber may be laundered into legal supply chains⁵⁸

and thus evade law enforcement detection. This enables criminal syndicates to generate vast illicit profits, making timber trafficking attractive to transnational organised crime.

Forest crimes frequently converge with other forms of enabling crimes, such as bribery, corruption and money laundering. For example, timber traffickers bribe customs officials or armed groups to ensure safe passage of goods along timber smuggling routes.⁵⁹ Corruption facilitates the acquisition of permits for mining sites and land clearing to produce and trade forest risk commodities.⁶⁰ Weak financial oversight enables financial backers to bankroll illegal forest conversion, either intentionally or inadvertently, such as when companies clear forests beyond authorised concession limits.⁶¹

Finance for illegal deforestation may also be sourced from other criminal activities, such as drugs or human trafficking, to help criminal networks to expand their influence.⁶² These actors also use shell companies and complex supply chains to launder illegal gains from minerals and timber.⁶³



Above: Log trucks smuggling illegal timber along the Myanmar-China border

The exploitation and trade of illicit timber, minerals and other forest based commodities generate income that can both trigger and sustain conflicts. Following the 2021 military coup in Myanmar, timber exports to international markets increased markedly, with revenues flowing directly to the military junta despite international sanctions;⁶⁴ rare earth mining in forest areas has also expanded, driven by armed groups and cross border commercial networks.⁶⁵ In the Amazon and eastern Democratic Republic of Congo, illegal mine sites and trade routes are sometimes controlled by armed groups or corrupt security forces, helping to finance conflicts which take a devastating toll on forest communities.⁶⁶ These extractive activities overwhelmingly benefit a narrow group of illegal actors while entrenching conflict and instability, leaving the wider population to bear the costs through lost public revenues, weakened governance, degraded ecosystems and long term impacts on livelihoods.⁶⁷

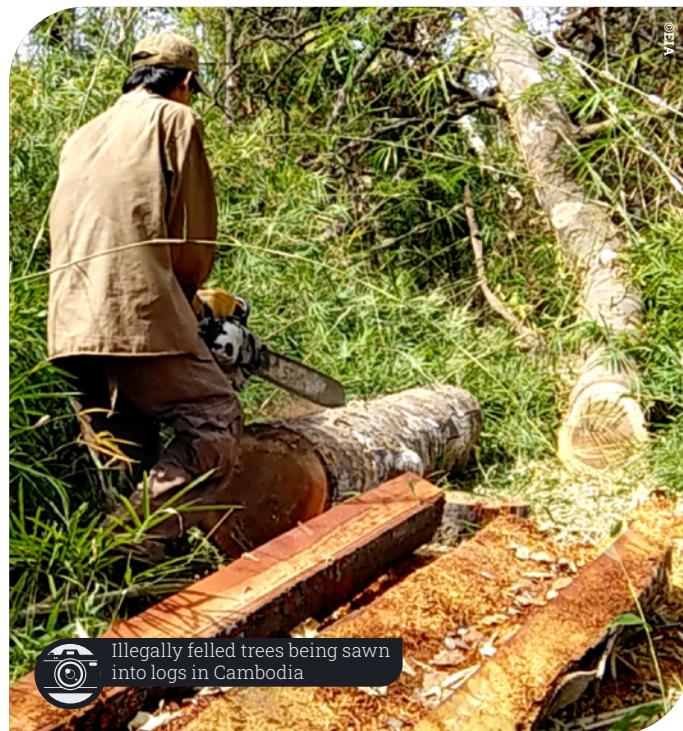
Forests with the highest levels of integrity, i.e. the lowest deforestation and degradation, are those that fall within areas traditionally owned, managed, used or occupied by Indigenous Peoples.⁶⁸ Indigenous Peoples are known to better protect forests across the tropics than protected areas alone. Indigenous Peoples and local communities' (IPLCs) detailed knowledge of sustainable forest use and management of forest ecosystems span time immemorial, making IPLCs essential for safeguarding forest integrity. These forests provide livelihoods, cultural identity and security for such groups.⁶⁹ And yet IPLCs are disproportionately affected by forest crimes. They face land dispossession, pollution and human rights abuses. For example, illegal logging operations may target IPLCs by trapping them in forced labour through debt bondage by issuing chainsaw loans linked to fictitious logging quotas.⁷⁰ Illegal mining, particularly for gold, often goes hand-in-hand with deforestation and pollution of rivers with mercury and other chemicals, destroying ecosystems IPLCs depend upon.

Weak enforcement at both national and international levels allows forest crime to proliferate. Time and again these crimes are viewed as victimless crimes, treated as low harm or regulatory offences rather than serious crimes under national laws; the absence of political will to act against these issues results in weak governance. Further, forest crimes are criminalised inconsistently across jurisdictions.

Addressing transboundary forest crime requires internationally recognised legal definitions and effective international cooperation to hold perpetrators to account. In their absence, enforcement is undermined by a lack of dual criminality and constraints on mutual legal assistance, allowing criminals to exploit legal loopholes with impunity.⁷¹ Even where sufficient evidence exists, judiciaries often lack the specialised knowledge and experience needed to prosecute CAE effectively, weakening sentencing outcomes.⁷² This dynamic fosters repeat offending, as perpetrators internalise low penalties and weak enforcement as an inevitable cost of doing business in pursuit of illicit profits.

Forest crimes still pose as a critical threat to our future. Healthy, intact forests are essential for biodiversity,

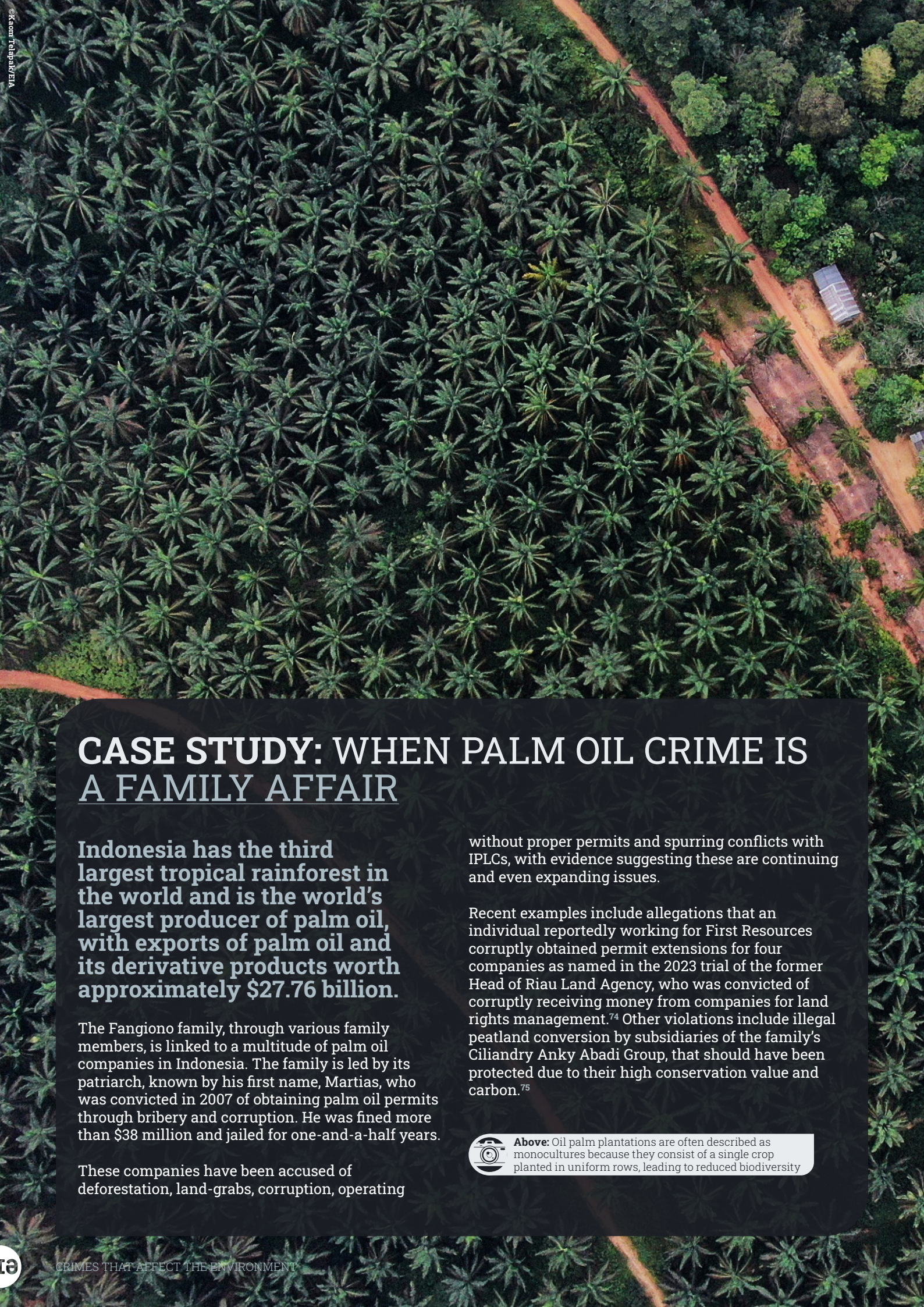
climate stability, social security and sustainable livelihoods.⁷³ Addressing forest crime therefore requires a fundamental shift in how these offences are understood and treated, recognising them as serious crimes intrinsically linked to organised crime, financial crime and human rights abuses. Without decisive political will, robust regulation and enforcement, forest crime will continue to dismantle the planet's remaining forests, imposing irreversible harms on people today and on generations to come.



Illegally felled trees being sawn into logs in Cambodia



Seized teak logs in Myanmar, May 2020



CASE STUDY: WHEN PALM OIL CRIME IS A FAMILY AFFAIR

Indonesia has the third largest tropical rainforest in the world and is the world's largest producer of palm oil, with exports of palm oil and its derivative products worth approximately \$27.76 billion.

The Fangiono family, through various family members, is linked to a multitude of palm oil companies in Indonesia. The family is led by its patriarch, known by his first name, Martias, who was convicted in 2007 of obtaining palm oil permits through bribery and corruption. He was fined more than \$38 million and jailed for one-and-a-half years.

These companies have been accused of deforestation, land-grabs, corruption, operating

without proper permits and spurring conflicts with IPLCs, with evidence suggesting these are continuing and even expanding issues.

Recent examples include allegations that an individual reportedly working for First Resources corruptly obtained permit extensions for four companies as named in the 2023 trial of the former Head of Riau Land Agency, who was convicted of corruptly receiving money from companies for land rights management.⁷⁴ Other violations include illegal peatland conversion by subsidiaries of the family's Ciliandry Anky Abadi Group, that should have been protected due to their high conservation value and carbon.⁷⁵



Above: Oil palm plantations are often described as monocultures because they consist of a single crop planted in uniform rows, leading to reduced biodiversity



2.6 WILDLIFE CRIME

Despite the lack of a universally agreed definition, the UNODC defines wildlife crime as the illegal exploitation of the world's wild fauna and flora⁷⁶ and the illegal destruction or alteration of habitats.⁷⁷ The pre-amble of the UNTOC, adopted in 2000, explicitly recognises its relevance in countering illicit trafficking in endangered species.⁷⁸

At the international level, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides a framework to regulate trade in listed species and enables cooperation between its 185 member countries. While CITES requires minimum standards, many countries have adopted broader national legislation covering additional species and activities. National frameworks also provide for the creation of protected areas to safeguard habitats, with specific criminal offences applicable to these areas.

Other international agreements such as the Convention on the Conservation of Migratory Species of Wild Animals, the Convention on Biological Diversity, the Ramsar Convention and the International Convention for the Regulation of Whaling also influence national laws on wildlife.

Additionally, recent resolutions of the UN General Assembly⁷⁹ and the UN Environment Assembly⁸⁰ urge countries to take serious consideration of, and measures to address, wildlife crime.

But despite decades of concerted efforts, wildlife crime continues to thrive as a lucrative business driven by sophisticated transnational criminal networks.

WHAT IS THE IMPACT OF WILDLIFE CRIME?

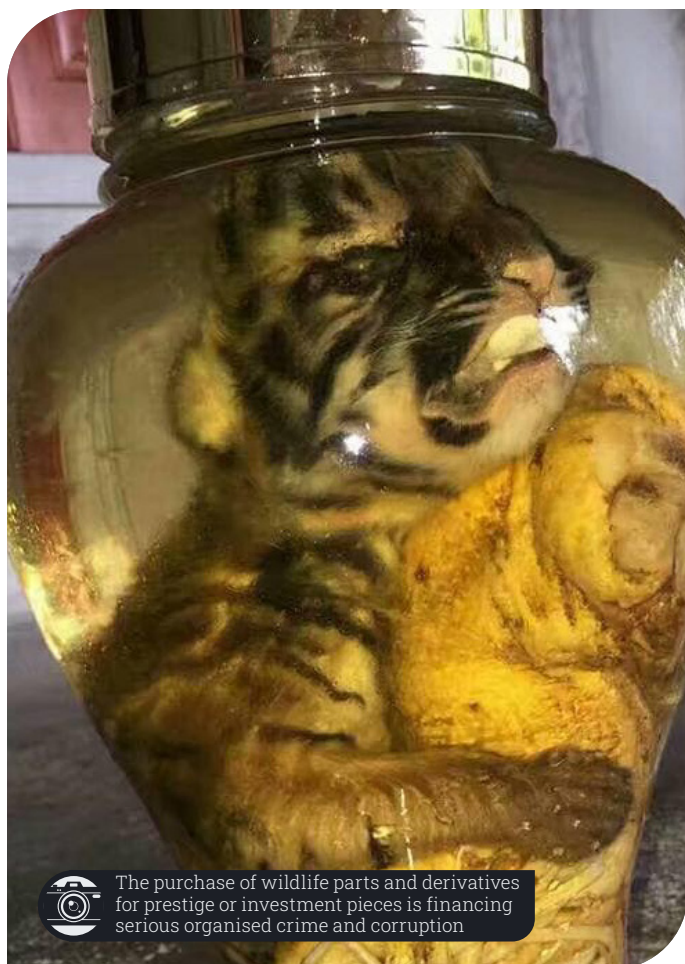
According to UNODC's World Wildlife Crime Report 2024, between 2015-21 approximately 4,000 wildlife species were recorded in global wildlife trafficking data, of which about 3,250 were listed in CITES Appendices.⁸¹ The poaching and trafficking of these species have contributed to local extinctions, disrupting ecological balance and diminishing ecosystems' capacity for carbon storage and regulation.

Beyond environmental impacts, wildlife crime also has serious social and economic consequences, undermining local livelihoods and exacerbating inequality and insecurity in regions heavily dependent on natural resources. It also affects the private sector, including legal wildlife traders and tourism operators through resource depletion, reputational risks and increased costs related to compliance and traceability requirements.⁸² For example, a 2016 Africa-wide study estimated that the illegal killing of elephants resulted in tourism losses of approximately \$25 million a year.⁸³

Wildlife crime additionally poses serious public health risks. The illegal wildlife trade increases the likelihood of zoonotic disease transmission, an issue which received heightened attention due to the COVID-19 pandemic. Research indicates that more than 60 per cent of emerging infectious diseases in humans are zoonotic, with approximately 71.8 per cent of these linked to wildlife.⁸⁴



Above: In addition to ivory, elephants in both Africa and Asia are also targeted for their skin and meat



The purchase of wildlife parts and derivatives for prestige or investment pieces is financing serious organised crime and corruption

KEY REMAINING CHALLENGES TO ADDRESS WILDLIFE CRIME

According to the World Bank, an average of \$269 million was spent annually between 2010-23 to combat wildlife crime.⁸⁸ Despite such investment and commitment by governments, the current enforcement responses remain inadequate, leaving wildlife crime far from being resolved.

A major challenge is the failure of post-incident investigations to collect robust evidence capable of supporting successful prosecutions. While enforcement success is often measured by seizures and arrests reported, for example, through INTERPOL or WCO-led operations or CITES mechanisms such as the Elephant Trade Information System, data on prosecutions and convictions is rarely available. This limits understanding of the true effectiveness of enforcement efforts.

The persistent failure to prosecute wildlife crime suspects continues to undermine accountability and justice. Few high-level cases reach the courts, while poachers and low-ranking members of criminal syndicates often plead guilty, allowing leaders and financiers to evade responsibility. Moreover, sentencing practices vary widely across jurisdictions and are frequently disproportionate to the impact of the crimes.

Corruption further undermines enforcement. Although UN Convention Against Corruption (UNCAC) Resolution 8/12⁸⁹ and other instruments such as CITES Resolution Conf. 17.6 (Rev. CoP19)⁹⁰ call on countries to assess, mitigate and counter corruption along value chains, robust, comprehensive and practice-based approaches to addressing corruption associated with wildlife crime remain woefully inadequate.

Effectively addressing wildlife crime requires strengthening criminal justice and moving beyond the seizure of contraband and arrests towards dismantling the organised networks. This includes tackling systemic weaknesses such as corruption, limited investigative capacity and inadequate legal frameworks to achieve sustained, long-term impact.

WHAT ARE THE ENABLERS OF WILDLIFE CRIME?

Strong demand for exotic pets, traditional medicines and luxury goods fuels illegal trade.

The US is one of the largest markets for exotic pets.⁸⁵ Between 2009-18, approximately 1,356 wild-caught species such as amphibians, birds, mammals and reptiles were imported to the US, 11 times greater than the number of CITES listed species.⁸⁶ The EU is also a central hub for the exotic pet trade.⁸⁷

Meanwhile, demand for wildlife products in Asia creates a powerful incentive for the poaching and trafficking of endangered species. In East and South-East Asia, this demand is largely driven by the use of animal parts in traditional medicine, with some consumers believing rhino horn, pangolin scales or tiger bone can cure serious health conditions. In addition, products such as ivory, big cat skins, teeth and claws are valued as status symbols and investment assets.

Corruption also plays a foundational role in enabling wildlife crime. Bribery of government officials facilitates smuggling, the issuance of fraudulent CITES permits, advance warning of enforcement actions and the safe passage of contraband through key transit points.

Weak governance and law enforcement further exacerbate the problem, creating a gap between law and practice that signals wildlife crime remains a low-risk, high-reward activity.



©National Parks Board of Singapore



The demand for wildlife parts such as pangolin scales for traditional medicine in East and South East Asia drives the global poaching and trafficking of many species



 HCFC refrigerant, smuggled in disposable cylinders labelled as HFC-134a, seized by Thailand customs, Bangkok, 2012.

CHAPTER 3

CRIMES THAT AFFECT THE ENVIRONMENT AND UNTOC



The transnational nature of CAE places them squarely within the scope of the UNTOC, which aims to facilitate cooperation in addressing crimes that individual states cannot effectively prevent, investigate or prosecute alone.

EIA identified and called out the threat of environmental crime in 2008 when we first advocated for the issue to be recognised and treated as serious, transnational organised crime.

UNTOC has always obliged parties to criminalise organised criminal activity, cooperate on extradition and mutual legal assistance and confiscate criminal proceeds – commitments which apply fully where CAE are perpetrated by organised criminal networks. EIA expects governments to honour these existing obligations and to ensure CAE are treated as a priority.

The international community's engagement with CAE has undergone a significant transformation in the past two decades. In 2012, the UN Conference on Sustainable Development (Rio+20) acknowledged illegal wildlife trade as a threat to sustainable development and reaffirmed the environmental rule of law as foundational to sustainable governance.⁹¹ The newly established UN Environment Assembly (UNEA) placed CAE on the global governance agenda from its inaugural session in 2014, adopting a dedicated resolution on the illegal trade in wildlife.⁹² The UN General Assembly followed in 2015 with its first-ever resolution specifically addressing illicit wildlife trafficking, explicitly recognising it as a form of transnational organised crime and invoking the framework of the UN Convention against Transnational Organised Crime (UNTOC).^{93,94} Successive resolutions in 2016, 2017, 2019 and 2021 progressively broadened this framing to encompass 'Crimes that Affect the Environment' (CAE) more widely, including trafficking in timber, hazardous waste and minerals.⁹⁵

The Conference of the Parties to UNTOC and the UN Commission on Crime Prevention and Criminal Justice (CCPCJ) have similarly adopted resolutions affirming that CAE demand a criminal justice response commensurate with other serious transnational crimes.⁹⁶ This significant level of intergovernmental attention reflects a belated but meaningful recognition that the threat is not merely an environmental concern but a security, governance and planetary crisis.

Discussions around strengthening UNTOC to more specifically address CAE began when EIA catalysed the first discussion on the matter at the 4th Session of the Parties to UNTOC,⁹⁷ when then-UNODC Secretary General Antonia Maria Costa chaired an EIA side event and floated the provocative idea of a 'fourth protocol', and we have continued to be an active participant in deliberations.⁹⁸

The debate continues today with the formation of an open-ended intergovernmental expert group (IEG), which concluded its second meeting in February 2026 without agreeing a single recommendation that could have furthered the process.

Such a protocol will not be an easy task to administer or finance, let alone implement and enforce. Nevertheless, we are supportive of an additional protocol covering the full spectrum of crimes driving climate change, biodiversity loss and pollution, from the poaching of wildlife and trafficking of timber to the illegal dumping of hazardous waste and the plunder of precious minerals.

Any additions to UNTOC must also include robust, binding accountability mechanisms to ensure governments are held to effective implementation, not merely formal ratification. A protocol which is weakly enforced could risk legitimising inaction.

IMPACT

CAE are not victimless offences – it causes serious environmental damage, undermines governance and inflicts significant social and economic harm.^{99,100} These impacts disproportionately affect low-income

countries, Indigenous Peoples and local communities whose livelihoods, food security and cultural identity rely directly on healthy ecosystems.¹⁰¹

EIA's investigations consistently show that crimes such as illegal logging and wildlife trafficking do far more than damage the environment – they undermine community resilience, contribute to corruption and deprive states and communities of critical resources.^{102,103,104,105}

Under UNTOC, 'serious crime' is defined by reference to sentencing thresholds. At the same time, the Convention's broader purpose is to address organised criminal activity posing serious threats to societies and economies. When evaluating the seriousness of CAE, it is therefore important to consider the impacts rather than relying solely on domestic sentencing standards or short-term enforcement outcomes.

This perspective aligns with UNTOC's emphasis on crimes warranting enhanced international cooperation, regardless of differences in national legal definitions or penalties.

The GI-TOC Global Organized Crime Index 2025¹⁰⁶ is one of few comprehensive studies that scores criminal markets on pervasiveness and impact. On this non-financial measure, CAE markets sit in the middle of the distribution – a strikingly different picture from the extreme inequality of the financial league table.

When a multi-dimensional harm framework is applied – assessing crimes across direct victims, geographic reach, irreversibility, temporal horizon, cascade/systemic effects and ecological/planetary impact – CAE dominate the dimensions that existing indices fail to capture. It scores at or near maximum on irreversibility, temporal horizon and ecological impact, dimensions on which all other crime types score near to zero.

PERPETRATORS – TRANSNATIONAL ORGANISED CRIMINAL NETWORKS

CAE often involves activities which cross multiple jurisdictions.^{107,108} For example, sourcing or extraction of resources may occur in one area or country while transportation, processing, financing and consumption happen elsewhere.

This cross-border structure reflects the complexities of global supply chains, creating inherent connections between source, transit and destination countries. The transnational nature of CAE places them squarely within the scope of the UNTOC, which aims to facilitate cooperation in addressing crimes that individual states cannot effectively prevent, investigate or prosecute alone.

CAE involve networks of actors operating across the supply chain, with different roles performed at different stages.^{109,110} These may include organising or coordinating activities, providing financing, arranging transport or logistics and concealing or legitimising criminal activity through business processes.^{111,112}



©Igor Paszkiewicz/iStock

Local actors are typically visible at the extraction point, while profit accumulation tends to be concentrated further along the chain.¹¹³ These organised structures enable CAE to be carried out on a large scale and to persist over time.

The presence of coordinated roles, ongoing activities and shared benefits is consistent with the elements used under UNTOC to identify organised criminal groups. This highlights the importance of focusing on criminal structures rather than addressing isolated offenders.

FINANCIAL FLOWS, PROFIT-DRIVERS AND MONEY LAUNDERING

CAE are primarily driven by economic incentives, leading to illicit profits which can be transferred, concealed or reinvested across borders.^{114,115} Financial flows play a crucial role in CAE, connecting criminal activities to both domestic and international markets.^{116,117}

Profits can be funnelled through commercial entities, trade transactions or other financial arrangements associated with legitimate business activities.¹¹⁸ These dynamics illustrate how CAE extend beyond physical harm to natural resources and can also involve financial conduct commonly associated with organised crime.

The emphasis on profit and financial gain underscores the relevance of UNTOC's focus on organised criminal activity undertaken for financial or material benefit, including conduct related to the proceeds of crime.

CORRUPTION AND ENABLING CONDITIONS

CAE frequently occur in contexts with institutional and structural vulnerabilities, creating opportunities for illegal activities to persist. Corruption continues to be a significant enabler, facilitating crime and protecting criminal networks from scrutiny and accountability.^{119,120,121}

The convergence of CAE with other forms of serious and organised crime has long been recognised, whether in the context of the flow of multiple commodity types or the role of physical convergence venues where multiple crime types occur; for example, at casino-dominated locations such as the Golden Triangle Special Economic Zone.^{122,123,124,125,126}

CAE are also enabled by wider structural conditions, including uneven legal and regulatory systems across countries, complex and opaque supply chains and the use of intermediaries to obscure responsibility and the origin of goods.¹²⁷

When combined, these factors lower risks and boost profitability for organised criminal networks. Recognising corruption alongside broader enabling conditions is consistent with UNTOC's focus on organised criminal activity and its treatment of corruption as conduct that facilitates such activity, rather than addressing offences in isolation.



CHAPTER 4

IMPEDIMENTS AND CHALLENGES



FRAGMENTED LEGISLATION

CAE and related offences are addressed through multiple areas of law, including environmental, forestry, fisheries, wildlife, customs and criminal law. In many countries, these legal frameworks operate in parallel and are not always aligned, resulting in fragmented approaches.^{128,129}

As a result, environmental offences may be pursued primarily as administrative or regulatory matters, including in cases with indicators of organised criminal activity. This can limit the use of criminal law tools and reduce the ability of authorities to address such conduct consistently.^{130,131}

Differences in how environmental offences are framed in law, as well as in applicable penalties and sanctions across jurisdictions, can also create challenges for cross-border cooperation.¹³² Where legal frameworks are not aligned, mutual legal assistance, extradition and joint investigations may be more difficult to pursue.¹³³

Improving coherence between legal frameworks can therefore help support more consistent responses and facilitate more effective international cooperation, including under UNTOC.



Above: Combating the illegal trade in ivory and other wildlife products requires robust policy and enforcement measures

Weak enforcement, fragmented laws and limited political commitment continue to make Crimes that Affect the Environment a low-risk, high-reward enterprise.



Log trucks waiting to cross the Myanmar-China border with illegal felled teak

WEAK DETERRENCE

Despite the scale and impacts of CAE, enforcement responses in many jurisdictions continue to generate weak deterrence.¹³⁴ This is driven in part by an ongoing focus on low-level visible offenders rather than on transnational organised crime networks.¹³⁵

Enforcement actions frequently prioritise seizures, administrative penalties and arrests, which may demonstrate activity but does little to disrupt criminal structures or reduce the profitability of CAE.¹³⁶ As a result, organisers and beneficiaries may remain largely shielded from accountability.¹³⁷

Successful prosecutions in more complex CAE cases remain limited, particularly where organised criminal activity, financial complexity or cross-border conduct is involved. Where cases do reach court, outcomes often involve fines or suspended sentences, which may be absorbed as a cost of doing business rather than acting as a meaningful deterrent.

The combination of few successful prosecutions, modest penalties and a focus on more visible actors can contribute to perceptions of CAE as high-reward, low-risk activities.¹³⁸ Where enforcement strategies do not prioritise organised crime networks or apply appropriate penalties, deterrent effects are weakened.

LIMITED CROSS-BORDER INVESTIGATION AND INTELLIGENCE-SHARING

Effective responses to CAE depend on cooperation between authorities across jurisdictions. However, cross-

border investigations and intelligence-sharing remain limited in practice.^{139,140}

Cooperation among authorities in source, transit and destination countries can be affected by differences in legal frameworks, institutional mandates and information-sharing arrangements.¹⁴¹ Information relevant to CAE is not always fully shared nor jointly analysed across jurisdictions, including through established channels such as INTERPOL and the World Customs Organization.¹⁴² This can make it more difficult to identify links between cases, routes, actors and financial flows.

International cooperation tools and platforms are available, but their application in CAE cases remains uneven.¹⁴³

Strengthening the use of existing international law enforcement cooperation mechanisms is therefore important to support more effective cross-border investigations and the coordinated responses envisaged under UNTOC.¹⁴⁴

INSUFFICIENT INTEGRATION OF ANTI-CORRUPTION AND FINANCIAL APPROACHES

CAE include corruption and acts related to significant illicit financial gain,¹⁴⁵ yet responses to these issues are often led by environmental or customs authorities, with anti-corruption and financial approaches applied in a more limited or case-specific manner.^{146,147}

While anti-corruption frameworks and anti-money laundering mechanisms are in place in many jurisdictions, they are not consistently integrated into



CAE responses.^{148,149,150} Financial investigations and corruption inquiries are not always pursued alongside environmental cases, even where indicators of bribery, abuse of office or illicit profit are present.¹⁵¹

This separation can limit enforcement agencies' ability to identify facilitators, organisers and beneficiaries and to trace and recover the proceeds of crime. As a result, enforcement efforts may address individual offences without fully engaging the financial and corruption-related dimensions that can underpin organised CAE.

LIMITED POLITICAL WILL

Tools to combat organised crime, including those outlined under UNTOC, are already available but their application to CAE remains uneven.^{152,153,154}

CAE are often addressed through sector-specific regulations or administrative measures, while broader tools for combating organised crime are applied less consistently. Where CAE are not viewed as a priority, resources may not be allocated for complex investigations, cross-border cooperation or the sustained use of criminal justice mechanisms.¹⁵⁵

While a new UNTOC protocol could elevate the status of CAE and enhance cooperation, by itself it would not ensure effective action. Without political prioritisation and a willingness to implement both existing and new tools, additional legal instruments may have limited practical impact. Examples of national responses can be seen in several jurisdictions, such as the increased response of China's Anti-Smuggling Bureau to tackling organised crime networks and the development of Nigeria's national strategy on wildlife crime, which has led to the formation of a multi-agency task force and major overhauls to legislation.¹⁵⁶

Addressing CAE therefore requires not only appropriate legal frameworks, but also clear political commitment to treat it, where appropriate, as serious organised crime and to act accordingly at national and international levels.

LACK OF COMPLIANCE MECHANISM UNDER UNTOC

UNTOC provides a framework for international cooperation against organised crime, but it lacks a formal compliance mechanism to assess how its provisions are implemented in practice. As a result, implementation approaches can differ across countries.

Existing review and dialogue processes support information exchange, but are limited in their ability to systematically track implementation or follow up on challenges over time.¹⁵⁷ This can make it difficult to assess how UNTOC tools are applied in specific contexts.

In the absence of a compliance mechanism, efforts to strengthen the role of UNTOC in addressing CAE, including through the possible development of a fourth protocol, would rely largely on voluntary implementation. Consideration of how implementation could be monitored and supported may therefore be relevant to future discussions.



Above, left: Trucks queue up in Timure near Nepal/Tibet border to get clearance from Nepal security force



Above: Enforcement against environmental crimes helps dismantle organised criminal networks



CASE STUDIES: EFFECTIVE ENFORCEMENT IS POSSIBLE

Targeted enforcement operations, often underpinned by investigative intelligence from organisations such as EIA, demonstrate that co-ordinated, multi-agency responses can achieve concrete results against CAE.

Illegal HFC refrigerant gases: Spain has emerged as a notable model for enforcement against the illegal HFC refrigerant trade. Identified as a significant hotspot in EIA's *More Chilling Than Ever* investigation (2024), Spain's Guardia Civil took a deliberate organised crime approach to the problem, with 2022 raids seizing about 121 tonnes of illegal gases worth more than \$11 million. A subsequent joint operation between the Spanish Tax Agency and National Police in December 2025 seized a further 48,515kg of illegal F-gases across nine linked companies, resulting in five arrests.

The Shuidong syndicate: EIA's 2017 report *The Shuidong Connection* exposed a Chinese criminal syndicate responsible for trafficking up to 80 per cent of all poached ivory from Africa through the town of Shuidong, in Guangdong province, China. Acting on

EIA intelligence, China's ASB disrupted the syndicate leading to multiple arrests and convictions, with custodial sentences ranging between three and 15 years.

Tanzania: EIA's *Vanishing Point* report (2014) catalysed enforcement in Tanzania, where the establishment of a National Task Force Anti-Poaching and improved inter-agency co-operation contributed to what we described as Tanzania being "no longer seen as a major exit for ivory." This shift was underscored by the 2016 sentencing of two Chinese traffickers to 30 years' imprisonment – then the highest penalty ever imposed for ivory trafficking in Africa.

Myanmar teak in Europe: EIA's *The Croatian Connection Exposed* (2020) revealed that European companies were routing illicit Myanmar teak through a Croatian importer to circumvent the EU Timber Regulation (EUTR), while a companion investigation, *State of Corruption* (2019), documented how a Thailand-based teak kingpin had systematically bribed senior Myanmar military and Government officials to sustain a fraudulent parallel trade.³ Together, these reports triggered investigations by Croatian, Dutch and German enforcement authorities, culminating in penalties issued against a number of companies for illegal timber imports into the EU.



The contents of refrigerant cylinders being tested by customs officials



Tanzania lost approximately 60 per cent of its elephant populations due to poaching for the illegal trade in ivory in only five years between 2009-2014

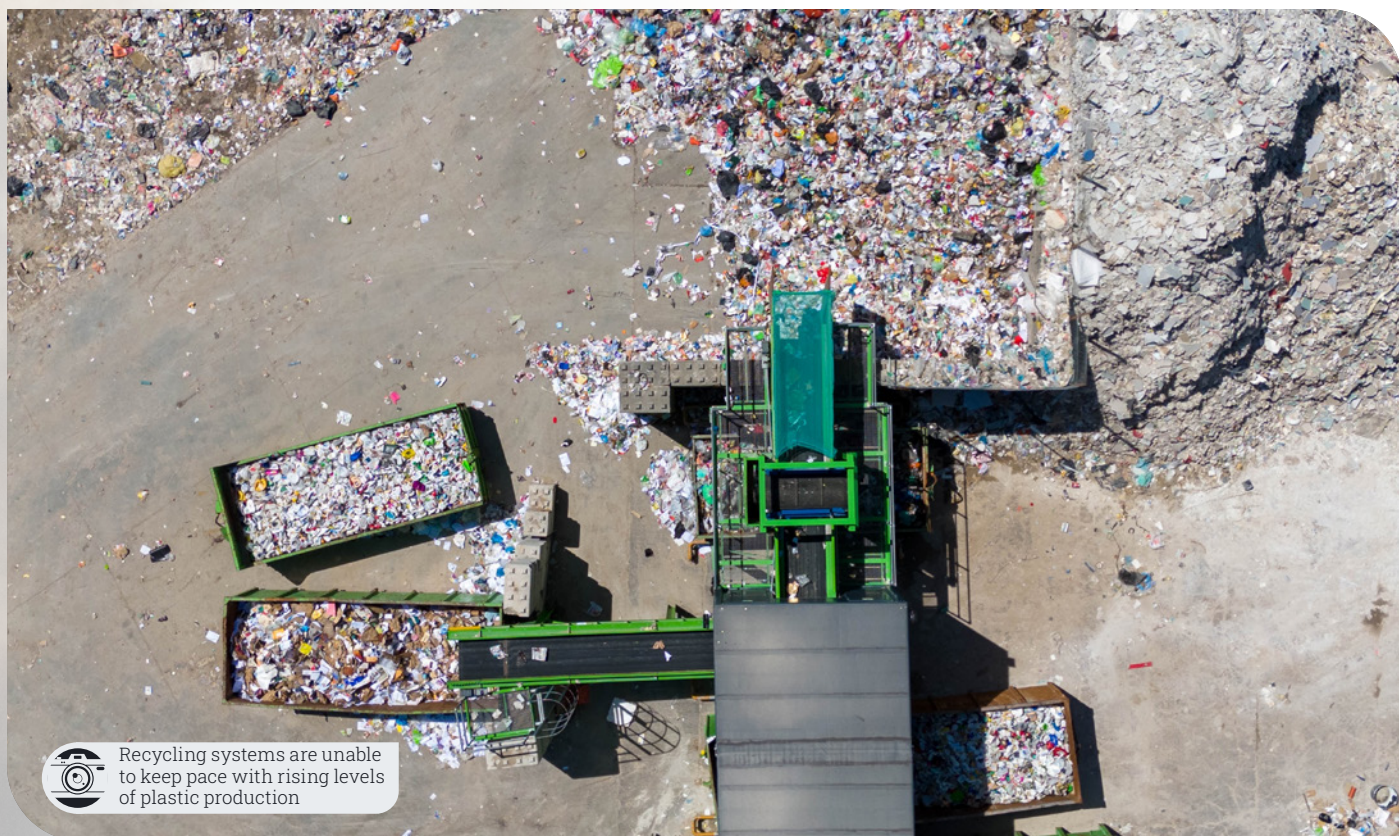


Several individuals were arrested and convicted for their involvement in the Shuidong case with penalties ranging from three to 15 years' imprisonment and asset forfeiture



Illegally felled teak entering China market from Myanmar

**FAILURE TO
ADDRESS
ENVIRONMENTAL
CRIME EMPOWERS
ORGANISED CRIME,
ACCELERATES
ENVIRONMENTAL
DEGRADATION AND
RISKS IRREVERSIBLE
HARM TO
ECOSYSTEMS,
ECONOMIES AND
COMMUNITIES
WORLDWIDE**



CHAPTER 5

CONCLUSION

Nearly two decades ago, EIA warned that CAE were an emerging organised crime threat requiring urgent, coordinated global action.

That warning was not made lightly, nor was it intended as a one-off intervention.

But, as this report shows, many of the same weaknesses identified in 2008 persist today – CAE continue to be underestimated, under-prioritised and inconsistently addressed, even as their scale, sophistication and impacts have grown.

In many respects, this report is reiterating a message that should already have been acted upon.

The consequences of CAE extend beyond immediate criminal harm, contributing to biodiversity loss, climate instability, economic insecurity and social disruption.

Continued failure to respond proportionately allows organised criminal groups to consolidate their operations while environmental harm becomes progressively harder and, in some cases, impossible to reverse.

Importantly, the international community is not starting from scratch. The legal frameworks, enforcement tools and cooperation mechanisms required to tackle organised CAE already exist, including those provided under the UNTOC. What has too often been lacking is sustained political attention, adequate resourcing, effective coordination and the willingness to treat CAE with the seriousness they demand.

This report serves both as an updated assessment and a renewed call to action. The evidence is clear, the risks are escalating and the solutions are known. Countries can no longer afford incremental or rhetorical responses – CAE must be recognised unequivocally as a priority organised crime threat and addressed through strengthened legislation, coordinated enforcement, financial investigation, anti-corruption measures and sustained international cooperation.

We have said this before. The analysis remains valid, but the urgency has only increased. The question is no longer whether CAE pose a serious threat – they do – nor whether the tools exist to address it – they do.

The question now is whether countries will finally listen and act with the commitment, coordination and urgency this global challenge demands.



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62-63 Upper Street, London, N1 0NY, UK
eia-international.org
+44 (0)20 7354 7960