



EUROPEAN

# POLICY BRIEF



European Union Action to  
**Fight Environmental Crime**

**EUROPEAN UNION ACTION TO FIGHT  
ENVIRONMENTAL CRIME (EFFACE)**

**Policy Brief 2: Organised Environmental Crime**

The need for combating environmental crime as a serious and organised category of offense

**November 2014**

## INTRODUCTION

Environmental crimes are serious offenses and frequently result from the coordinated activity of organised criminal networks. Such crimes can be difficult to identify in overall crime statistics and in their impacts on victims, but the results of this type of illegal activity have consequences for economies, human health, biodiversity and good governance.

The following examples of environmental crimes have impacts concerning Europe and beyond. The EFFACE project is researching environmental crime as a concern that can be elevated at the EU level for more effective coordination in enforcing environmental laws and limiting the harmful impacts of this complex criminal activity.

### **Trans-national, sophisticated and serious**

Many environmental crimes are transnational in that actors operate in supply countries, transit zones, and consumer destinations – and such activity may also constitute organised crime. Concerted cooperation of actors in various countries is needed to combat a range of offenses that include the following:

- Electronic waste transported from Europe to West Africa
- Ivory trafficked from Africa – through EU ports – to China and the United States
- Logs felled in Malaysia and transported under false documents to the EU
- Buying and selling of arms by groups to kill animals and murder rivals
- Bribing customs officials and issuers of permits and certifications
- Employing lawyers, notaries, casino owners and bankers to launder criminal funds.

Topics such as these will be dealt with in the series of EFFACE case studies.

Evidence is mounting that wildlife crime is a source of financing of terrorist groups, especially in the Horn of Africa, Central and West Africa. Also, illegal logging and selling of timber provide that function, e.g. the Taliban have deforested large parts of Northern Pakistan to finance their operations.<sup>1</sup>

Especially in the cases of the transnational criminal activities mentioned, operations may be run by Organised Crime Groups (OCGs), which are often involved in several types of illegal activities, such as combining illegal fishing with human trafficking, and exporting (illegal) logs with smuggling of cocaine (Colombia, Suriname).

The question needs to be addressed: Why, if these crimes are indeed so serious and organised, is so little attention received from politicians, policy-makers and actors within the criminal justice systems in general, especially in the EU? This is one focus that the EFFACE research project has taken to fight environmental crime. On the basis of the research results, recommendations will be formulated to help promote methods of national, EU-level and international cooperation to address these serious challenges.

### **Why define organised crime?**

There is a lack of consensus on a precise, international definition of organised crime, but the motive of financial gain is a common point. The UN Convention against Transnational Organised Crime defines an “organised criminal group as a structured group of three or more persons, existing for a period of time and acting in concert with the aim of committing one or more serious crimes or offences established in accordance with this Convention, in order to obtain, directly or indirectly, a financial or other material benefit”.<sup>2</sup> Similarly, the U.S. Federal Bureau of Investigation (FBI) defines an organised criminal group as “any group having some manner of a formalised structure and whose primary objective is to obtain money through illegal activities. Such groups maintain their position through the use of actual or threatened violence, corrupt public officials, graft, or extortion, and generally have a significant impact on the people in their locales, region or the country as a whole”.

A 2013 briefing from the European Parliament Library states that to define organised crime is problematic and provides one insight on the value and challenges of defining organised criminal activity. “The definition of the conduct to be criminalised is both an essential element of anti-organised crime instruments and a formidable challenge for legislators. The difficulty lies in the diversity of activities carried out by criminal groups, and in differences in their structure (while some of them are highly hierarchical, others are very loose and flexible)”.

At the international level, the search for a common denominator is further complicated by differences in national criminal law. In the EU there are basically three types of approaches to addressing organised crime: 1) Civil law criminalising participation in a criminal association 2) Common law based on conspiracy to commit crime 3) Scandinavian approach that relies on criminal law content, while rejecting the “criminal organisation” element.<sup>3</sup>

A loose crime description has the advantage in that new elements of crime can easily be incorporated into working definitions as insights progress. However, in combating

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<sup>1</sup> “PAKISTAN: Forests fall victim to the Taliban” (News Article, *Inter Press Service*, 17 January 2012), Ashfaq Yusufzai, accessed 5 October 2014, <http://www.ipsnews.net/2012/01/pakistan-forests-fall-victim-to-the-taliban/>

<sup>2</sup> “Organized Crime” (UNODC website) accessed 5 October 2014, <https://www.unodc.org/unodc/it/organized-crime/index.html>

<sup>3</sup> “The EU response to organised crime” (EU Parliament Library Briefing, 6 September 2013), Piotr Bąkowski, [http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2013/130625/LDM\\_BRI\(2013\)130625\\_REV1\\_EN.pdf](http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2013/130625/LDM_BRI(2013)130625_REV1_EN.pdf)

environmental crimes that are transnational, enforcement requires the coordinated operation of actors in various countries. Within the EU, the cooperation of the criminal justice systems of EU Member States or with outside jurisdictions may be required if there is an EU dimension involved in the criminal activity. If investigators, prosecutors and judges have to cope with vague or inconsistent definitions of the crimes they are addressing, there could be a considerable difference in how investigations and prosecutions are applied. In such scenarios, the effectiveness of enforcement and judicial efforts is substantially reduced and OCGs have a greater advantage.

Regarding the growth of EU-wide and international criminal activities, there is a greater need for a harmonised and clear definition of organised crime, as it relates to environmental offenses.

## EVIDENCE AND ANALYSIS

The 2013 EUROPOL SOCTA (Serious and Organised Threat Assessment) estimates that 3,600 international criminal organisations are operating in the EU and that, of those “70% have a geographically heterogeneous composition and range of action, and more than 30% are poly-crime groups”. Both Belgium and Portugal reported criminal groups consisting of more than 60 nationalities. And the 2013 SOCTA notably lists environmental crime as an emerging threat, especially in the field of waste.<sup>4</sup>

### **Illegal disposal of hazardous waste**

This is one of the most widely-recognised forms of environmental crime. Disposal of hazardous forms of waste in compliance with environmental regulations can be nearly cost-prohibitive for some companies. This is an attractive area for criminals in that the illegal dumping of hazardous waste, including e-waste, creates lucrative opportunities. An estimated 1.5 million containers with illegal waste are shipped each year, with a market value thought to be between USD 10-12 billion.<sup>5</sup>

The “Triangle of Death” in the Naples region, is an area in which the Camorra organised crime group has operated for decades. Their continued existence can be attributed to political influence in the area and their ability to bribe or threaten officials to gain access to landfill sites and to ward off inspections. Illegal dumping in this area seriously compromises human health, and through the contamination of the soil and groundwater, has long-term effects on all life.

Italy is just one country that is affected. “In Scotland authorities are liaising with INTERPOL to crack down on Mafia-style gangs which have muscled in on the country’s lucrative illegal waste industry, estimated to be worth about £ 27 million in 2013. About 20% of all criminal gangs, including some of the ‘top tier criminals’ in Scotland are linked to waste firms, according to the Scottish Environment Protection Agency. Gangs use violence to secure waste disposal contracts, cut corners and fiddle taxes using similar tactics to Mafia clans in

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<sup>4</sup> EUROPOL; *EU Serious and Organised Crime Threat Assessment (SOCTA)*; 2013; <https://www.europol.europa.eu/sites/default/files/publications/socta2013.pdf>

<sup>5</sup> “Environmental crimes, research”, (UNICRI website), accessed 7 October 2014, <http://www.unicri.it/topics/environmental/research/>

southern Italy”.<sup>6</sup> The use of violence and/or the threat of violence is typical for the illegal waste business and is an essential element of organised crime.

A fast-growing problem in illegal waste is the trafficking and dumping of electronic waste (e-waste) that may originate from consumer countries in Europe and then be shipped to destinations in Africa. The e-waste consists of discarded computers, televisions, mobile phones and other devices. The effect of illegal e-waste shipments can be seen in countries like Ghana where children are “employed” to strip this waste to harvest its valuable materials such as gold, copper and palladium. This type of work brings them in contact with hazardous substances also in the devices such as mercury and cadmium.

The World Bank Office in Ghana stated that “the health risk associated with unregulated and informal recycling of electronic waste and use of mercury in artisanal and small-scale gold mining (ASGM) is creating a legacy of severe adverse and irreversible environmental health, economic and social impacts”.<sup>7</sup>

Here there is a link with the EU policy on mercury – banning all exports of mercury and preventing the uses of mercury where it may enter the environment. This is an objective of the UN Minamata Convention, signed and to be ratified by all Member States and the EU.

INTERPOL launched a major initiative to target the illegal trade of e-waste. More than 240 tonnes of electronic equipment and electrical goods were seized and the launch took place of criminal investigations against some 40 companies involved in all aspects of the illicit trade.

Held in November and December 2012, Operation Enigma saw the participation of police, customs, port authorities and environmental and maritime law enforcement agencies in seven European and African countries. The operation was aimed to identify and disrupt the illegal collection, recycling and export of electronic devices before being dumped in landfills or other sites where they could cause severe environmental harm.<sup>8</sup>

The impact of illegal waste trafficking on health and the environment – including related organised crime groups destabilising societies – is a situation which calls for a European-wide approach. The previous European Parliament adopted a resolution to pool efforts on a European scale for a more effective joint action to prevent and combat “ecomafias”.<sup>9</sup>

In further discussing solutions to counter the illegal disposal of hazardous waste – besides deterrence by criminal sanctions – one may also consider positive incentives such as providing for recycling facilities and creating markets for recycled (strategic) materials.

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<sup>6</sup> “Crackdown on Scottish Mafia’s illegal waste racket” (News article, *The Scotsman*, 12 August 2014), Mark McLaughlin, accessed 7 October 2014, <http://www.scotsman.com/news/environment/crack-down-on-scottish-mafia-s-illegal-waste-racket-1-3507167>

<sup>7</sup> “Ghanaian minister urges collaboration among African countries to reduce pollution levels” (News Article, *Coastweek.com*, undated), Francis Tandoh, accessed 8 October 2014, <http://www.coastweek.com/3718-africa-05.htm>

<sup>8</sup> Countering WEEE Illegal Trade (Website), Accessed 5 October 2014, <http://www.cwitproject.eu/>

<sup>9</sup> “On organised crime, corruption and money laundering: recommendations on action and initiatives to be taken”, (EU Parliament report, 3 July 2013), Salvatore Iacolino, accessed 1 October 2014, <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A7-2013-0307+0+DOC+PDF+V0//EN>

## Illegal fishing

Illegal fishing activities – often referred to as IUU (illegal, unreported and unregulated fishing) – has immediate negative impacts on marine life populations and habitats in EU waters, and on the economic well-being of lawful fishermen operating in the same areas. IUU is also a clear example of an environmental crime that is linked to other serious and organised crimes, notably human trafficking.

The 2011 UNODC study *Transnational Organised Crime in the Fishing Industry* found that “the fishing industry is associated with human trafficking in two distinct contexts. First migrant labourers and fishers fall prey to human traffickers for the purpose of forced labour on board of fishing vessels...Second, women and children in fishing ports are vulnerable to organised exploitation of their prostitution by fishers”.

Furthermore, the UNODC study found that “fishing vessels are used for the purpose of smuggling of migrants, illicit traffic in drugs (primarily cocaine), illicit traffic in weapons, and acts of terrorism. Fishing vessels are used as mother ships, i.e. vessels that serve as base stations from which criminal activities take place, as supply vessels for other vessels engaged in criminal activities, or simply as cover for clandestine activities at sea and in port”.<sup>10</sup>

Regarding IUU environmental concerns, another example is found in Scotland. Divers working for organised crime gangs are “electrifying the seabed of the coast of Argyll and making up to £65,000 a day selling the illegally harvested razor clams on the black market. They may take away 500-600 kg of razor clams a day, which are shipped away within 24 hours with ‘legal papers’ from Glasgow to Asian markets via Singapore. A legal boat might recover only one or two kilos a day”.<sup>11</sup>

Of course, bribing customs and laundering the financial proceeds of this trade are inherent in the illegal fishing trade, making it a prominent manifestation of organised crime. With the EU being a major supplier and consumer of fish products, it has a key global responsibility to combat IUU Fishing. The EU has already developed a formidable list of policies and tools to do this.<sup>12</sup>

## Illegal wildlife poaching and trafficking

Wildlife crime threatens the survival of numerous species – some of them iconic ones as elephants, rhinos, and tigers – as well as disrupting ecological balances and stealing sources of income of local communities. Although the habitats of many trafficked species is in Africa and Asia, the concern of wildlife trafficking reaches into the EU because it is a consumer destination and transport hub in this illegal international trade.

The surge of this inhumane crime has been well-documented in the media in recent years. From February to April 2014, the European Commission held a call for recommendations and a conference to see how wildlife crime can be best dealt with on EU and global levels. The following is a result of the Commission’s outreach.

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<sup>10</sup> UNODC; *Transnational Organized Crime in the Fishing Industry: Focus on Trafficking in Persons, Smuggling of Migrants, Illicit Drugs Trafficking*; 2011; [http://www.unodc.org/documents/human-trafficking/Issue\\_Paper\\_-\\_TOC\\_in\\_the\\_Fishing\\_Industry.pdf](http://www.unodc.org/documents/human-trafficking/Issue_Paper_-_TOC_in_the_Fishing_Industry.pdf)

<sup>11</sup> “Criminal gangs making more from illegal fishing than drugs” (News article, *Herald Scotland*, 11 September 2014), Courtney Cameron, Accessed 1 October 2014, <http://www.heraldscotland.com/news/home-news/criminal-gangs-making-more-from-illegal-fishing-than-drugs.25297637>

<sup>12</sup> “The EU rules to combat illegal fishing (IUU)” (European Commission website report menu, undated), Accessed 30 September 2014, [http://ec.europa.eu/fisheries/cfp/illegal\\_fishing/info/index\\_en.htm](http://ec.europa.eu/fisheries/cfp/illegal_fishing/info/index_en.htm)

“Wildlife trafficking - a serious organized crime”

“Wildlife trafficking has become one of the most profitable criminal activities globally, driven by a massive and growing demand for wildlife products, notably in Asia. It is now a multi-billion Euro business, which attracts **transnational organised crime networks** and which resembles in character and scale other types of global criminal activities, such as trafficking in drugs, human beings, firearms and counterfeit goods. Low levels of awareness about the problem, a low risk of detection and low sanction levels make it particularly lucrative for criminals.

In addition, the income generated by this environmental crime is reported to be used to finance terrorism. This holds especially for the ivory trade e.g. from poached elephants in Kenya financing weapons for the Al-Shabaab groups in neighbouring Somalia, from elephants in the DRC Congo financing the militias in the eastern part of the country, the Lord's Resistance Army in the border triangle of South Sudan, Central African Republic and DRC Congo. Also in Mali, the unique elephant population is falling victim to the terrorist groups in that part of Africa”.<sup>13</sup>

### **Illegal logging**

Illegal logging contributes to deforestation, a major cause of climate change, threatening the survival and well-being of the global community of life, as is reported frequently in media sources. Illegal logging also deprives local, often indigenous, communities of their livelihoods.

“Forest crime, such as illegal logging, has previously been estimated to represent a value of 30–100 billion USD annually or 10–30% of the total global timber trade. An estimated 50–90% of the wood in some individual tropical countries is suspected to come from illegal sources or has been logged illegally”. Some technology-based monitoring initiatives have yielded results, such as satellite monitoring and the use of mobile phones, but large-scale illegal logging operations remain largely profitable, and in some cases, violent”.<sup>14</sup>

One case is found in a media report from Peru (a logging source country potentially for the EU and other areas). *The Guardian* reported that “Illegal loggers are being blamed for the murder of four natives including a prominent anti-logging campaigner near the Peruvian frontier with Brazil. A leader with Peru’s largest indigenous federation called on the Peruvian state to do more to protect indigenous people from criminal mafias. ‘There’s so much corruption in the regional governments that these logging mafias can kill our brothers with impunity.’”<sup>15</sup>

The international community has shown signs of recognising the scale of illegal logging activity as a serious and organised operation. “Improved intelligence sharing among agencies has also enabled INTERPOL to support countries in larger and more effective

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<sup>13</sup> “The EU approach to combat wildlife trafficking”, (European Commission website, undated), Accessed 30 September 2014, ([http://ec.europa.eu/environment/cites/trafficking\\_en.htm](http://ec.europa.eu/environment/cites/trafficking_en.htm))

<sup>14</sup> UNEP/INTERPOL; *The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources*. A UNEP Rapid Response Assessment; 2014; <http://www.unep.org/unea/docs/rrcrimecrisis.pdf>

<sup>15</sup> “Illegal loggers blamed for murder of Peru forest campaigner” (News Article, *The Guardian*, 9 September 2014), Dan Collyns, Accessed 28 September 2014, <http://www.theguardian.com/world/2014/sep/09/illegal-loggers-blamed-for-of-peru-forest-campaigner>

police operations, leading to larger seizures of illegal timber and wildlife products. In 2013, Operation Lead, under INTERPOL's project LEAF, was conducted in Costa Rica and Venezuela. It resulted in 292,000 cubic meters of wood and wood products seized – equivalent to 19,500 truckloads and worth about USD 40 million".<sup>16</sup>

### **Analysis: Serious and organised**

Environmental crimes described in the previous section have been shown to be forms of **serious, transnational organised crimes** perpetrated frequently by transnational organised crime networks or Organised Crime Groups (OCGs) that switch between and combine crimes, respecting no national borders.

Against these criminal threats stands a relatively small number of hard-working enforcement officials, who are often hampered by a lack of resources as they work in and across an EU divided by 28 national jurisdictions. Organisations such as EUROPOL and Eurojust continue their efforts with relatively small environmental crime departments and budgets compared to some national and European enforcement agencies working in other crime areas.

According to interviews with enforcement officials, a contributing factor to the ongoing presence of varied criminal activities in the areas of environmental crime is the lack of political priority given to addressing crimes against nature. Environmental crimes may seem "victimless". The children in Ghana are far away and so are the indigenous communities driven from their lands by illegal logging. Similarly, waste dumped in the sea or in a landfill has disappeared from sight and the impacts on health only become evident later when the point of prevention has passed.

In considering environmental crimes against other singular offenses such as murder and drug-trafficking, allocation of adequate resources for the enforcement of environmental laws could be viewed as a sort of "luxury" to be put on a wish-list of activities that could be done if more resources were available.

However, the crimes described here would all fit under or be closely linked to the list of "Euro Crimes" mentioned in Art 83 (1) of the Treaty on the Functioning of the EU (TFEU):

- Terrorism
- Trafficking in human beings and sexual exploitation of women and children
- Illicit drug and arms trafficking
- Money laundering and corruption
- Counterfeiting of means of payment
- Computer crime
- Organised crime

The EU could further analyse setting definition criteria and levels of sanctions regarding environmental crimes and the connection with other offenses. If there is an evident and close connection established, environmental crime could be elevated to a "serious" level. There could then be given the political priority and resources for criminal justice systems at the Member State and EU levels to more adequately deal with this form of organised crime.

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<sup>16</sup> UNEP/INTERPOL; *The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources*. A UNEP Rapid Response Assessment; 2014; <http://www.unep.org/unea/docs/rracrimecrisis.pdf>

Moreover, it can be difficult for prosecutors to obtain a conviction for activities linked to environmental crimes. Criminal charges such as fraud or forgery are pursued against environmental offenders in some court cases rather than under environmental criminal provisions. This occurs because the burden of proof and criminal guidelines may be clearer for non-environmental offenses. As a result, it can be difficult to obtain statistics on the actual number of environmental crimes taking place. This may have an impact on resources given to enforcement agencies, because environmental crimes convictions may become more “invisible” in public records.

One case example is from June 2014 in Belgium in which four defendants involved in an organised criminal network were initially arrested on CITES violations and then convicted of charges linked to fraud and money laundering. A court press release stated, “The defendants took advantage of the lack of political priority and thus enforcement of the CITES-regulations”. The defendants were also found guilty of participating in a criminal organisation “with international branches in Spain, the United Kingdom, Austria, Germany, France and The Netherlands”. The press release further indicated that the group had obtained forged CITES-certificates and marketed the protected birds.

“Typical of the criminal organisation was a clear hierarchy and division of tasks, the use of (police) officials and the creation of an animal zoo to obtain credibility and access to the market”. And in recognition of the growing seriousness of environmental crime, it was noted that “international trade in endangered plant and animal species has approached a scale and lucrativity comparable to international drugs and arms trafficking”.<sup>17</sup>

### **Follow the money**

There is consensus that the prime motive for environmental crime as a form of organised crime is for financial gain, and the Euro crimes listed in Art. 83 TFEU are also mostly committed to indeed make money. Because of the core financial motives when environmental crimes are committed as a form of organised crime, it is of great relevance that the Financial Action Task Force (FATF) has included this crime in its list of designated categories of offences.<sup>18</sup>

Arresting and penalising individual members of organised crime groups may have limited effect in the longer-term, as these groups can be designed in their structure for the “occupational hazard” of incarceration. However, disrupting the flow of money and methods of laundering can have a more substantial impact on limiting the activities of these types of organisations.

The FATF is an intergovernmental body, established in 1989 and based in Paris, on the premises of the OECD. Some of the tasks assigned to the FATF are:

- Identify and analyse money laundering and terrorist financing.
- Set standards for the combat of these threats to the integrity of the financial system.
- Deal with high-risk, non-cooperative jurisdictions.
- Respond to new threats as identified by the UN Security Council (e.g. the financial aspects of non-proliferation resolutions) and the G-20.

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<sup>17</sup> (Press release, Court of First Instance East-Flanders – Ghent division, 27 June 2014) Accessed 8 October 2014, <http://cites.org/sites/default/files/eng/news/sundry/2014/COURT%20OF%20FIRST%20INSTANCE%20EAST%20FLANDERS%20PRESS%20RELEASE%2027%20June%202014.pdf>

<sup>18</sup> Designated categories of offenses (FATF website) Accessed 2 October 2014, <http://www.fatf-gafi.org/pages/glossary/d-i/>



FATF has 36 Members, including the European Commission, Regional Associate Members, and Observers such as EUROPOL, Eurojust, INTERPOL, the UNODC and the World Customs Organisation.<sup>19</sup> As environmental crime is one of the offences listed by the FATF, the organisation can play a key role in focusing on scenarios like the financial trails in the supporting of terrorist organisations by the ivory trade.<sup>20</sup>

FATF may provide important insights on how to best address environmental crime and to possibly identify ways how investigation and prosecution of such crimes may be assisted by looking at them from for example the money laundering perspective. Such an approach could entail much higher sanctions than if only the environmental crime as such would be considered.

## POLICY IMPLICATIONS AND RECOMMENDATIONS

The crimes discussed here and addressed by the EFFACE research project are manifestations of serious, transnational organised crime and should be treated as such. At the present stage of its research, EFFACE can provide only preliminary and tentative recommendations. As more outputs of the EFFACE project become available – for example on costs and impacts of environmental crime – more detailed recommendations will be formulated on how the EU should deal with environmental crimes committed by organised networks.

It is already clear now that these crimes should also be considered by the Standing Committee on Operational Cooperation on Internal Security (COSI), a body of the EU Council which considers organised crime (particularly regarding illegal waste) as a serious threat to the security of the EU. The dismantling of organised crime networks is indicated as a priority. EUROPOL and Eurojust play major roles in the implementation of the EU Internal Security Strategy, for which COSI is responsible. The environmental dimension of this Strategy may need to be further developed.<sup>21</sup>

Suggestions related to environmental crime were mentioned in the 2011 Communication from the European Commission on effective implementation of EU policies through criminal law in coherence.

The vision for a coherent and consistent EU Criminal Policy by 2020 includes a concern for “notably the protection of the functioning of the financial markets, the protection of the financial interests of the EU, the protection of the euro against counterfeiting, serious infringements of road transport rules, serious breaches of data protection rules, customs offences, **environmental protection, fisheries policy** and internal market policies to fight illegal practices such as counterfeiting and corruption or undeclared conflict of interests in the context of public procurement. There should be a common understanding on the guiding principles underlying EU criminal law legislation, such as the interpretation of basic legal

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<sup>19</sup> *Financial Action Task Force Mandate (2012-2020)*, (FATF website) Accessed 2 October 2014, <http://www.fatf-gafi.org/media/fatf/documents/FINAL%20FATF%20MANDATE%202012-2020.pdf>

<sup>20</sup> “End Wildlife Poaching – and its financial benefit to terrorists”, (News Article, *The Cutting Edge*, 27 March 2014), Avi Jorisch, Accessed 30 September 2014, <http://www.thecuttingedgenews.com/index.php?article=82970>

<sup>21</sup> Standing Committee on Operational Cooperation on Internal Security (COSI) (European Commission website) Accessed 8 October 2014, [http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/internal-security/cosi/index\\_en.htm](http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/internal-security/cosi/index_en.htm)

concepts used in EU criminal law; and how criminal law sanctions can provide most added value at EU level”.<sup>22</sup>

Both at the EU and at national level, the value of using and extending criminal law need to be thoroughly considered in comparison to other policies and instruments the EU has at its disposal to contribute to a truly sustainable world. Officially recognising at the EU level the seriousness and organised elements of environmental crime needs to take place in order to allocate sufficient resources to fighting environmental crimes that have impacts far beyond forests and seas.

## RESEARCH PARAMETERS

The research project “European Union Action to Fight Environmental Crime” (EFFACE) is aimed at providing policy recommendations to the EU on how to better fight environmental crime. Drawing on a combination of quantitative and qualitative approaches of different types of environmental crime and engaging in interdisciplinary research, EFFACE will provide the following:

- An assessment of the main costs, impacts and causes of environmental crime in the EU, including those linked to the EU, but occurring outside its territory,
- An analysis of the status quo in terms of existing instruments, actors and institutions
- A number of case studies on various types of environmental crime of relevance to the EU
- An analysis of the strengths, weaknesses, threats and opportunities (SWOT) associated with the EU’s current efforts to combat environmental crime

These research efforts will feed into overall policy recommendations. Stakeholder involvement in EFFACE promotes mutual learning with and among a broad range of stakeholders.

## PROJECT IDENTITY

<b>PROJECT NAME</b>	European Union Action to Fight Environmental Crime (EFFACE)
<b>COORDINATOR</b>	Scientific coordinator: Christoph Stefes, Senior Fellow, Ecologic Institute, Berlin, Germany  General coordinator: Christiane Gerstetter, Senior Fellow, Ecologic Institute, Berlin, Germany, envcrime@ecologic.eu
<b>CONSORTIUM</b>	Chatham House – London, UK Ecologic Institute – Berlin, Germany

<sup>22</sup> *Towards an EU Criminal Policy: Ensuring the effective implementation of EU policies through criminal law*, (European Commission website, 20 September 2011) Accessed 5 October 2014, [http://ec.europa.eu/justice/criminal/files/act\\_en.pdf](http://ec.europa.eu/justice/criminal/files/act_en.pdf),

Institute for Environmental Security – The Hague, the Netherlands  
Institute for European Environmental Policy – London/Brussels, UK/Belgium  
Maastricht University – Netherlands  
Sapienza - University of Rome – Italy  
School of Law, Queen Mary, University of London –UK  
University of Catania – Italy  
University of Granada – Spain  
University of Oslo – Norway  
University of South Wales – Treforest, UK

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**FUNDING SCHEME**

FP7 Framework Programme for Research of the European Union – Collaborative project, SSH.2012.2.2-3, New types of offence in a globalised world: the case of environmental crime

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**DURATION**

December 2012 – March 2016 (40 months)

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**BUDGET**

EU contribution: EUR 2,318,600

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**WEBSITE**

<http://www.efface.eu>

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Follow us on twitter: <https://twitter.com/EnvCrime>

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**FURTHER READING**

*Wildlife and Forest Crime Analytic Toolkit*, UNODC, January 2013  
*EU Serious and Organised Crime Threat Assessment*, EUROPOL, 2013  
*Transnational Organised Crime in the Fishing Industry*, UNODC, 2011

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