



# GLOBAL INITIATIVE

AGAINST TRANSNATIONAL  
ORGANIZED CRIME



# UNDERCURRENTS

## BLUE CRIME ON THE DANUBE

Walter Kemp | Ruggero Scaturro

JUNE 2024





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*Blue crime on the Danube*

WALTER KEMP | RUGGERO SCATURRO

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## ACKNOWLEDGEMENTS

In carrying out research for this report, the authors were grateful for the cooperation and expertise of Adam Kalmar, Deputy Head of Borders and Aliens Policing Division of the Hungarian Police in Baranya County. The authors would also like to thank Robert Lichtner for opening doors and connecting people. The engagement of Andrada-Mihaela Bocea, Iulia Cozacenco, Giulia D'Amico, Saša Đorđević, Kosyo Ivanov and Fedir (Fred) Sydoruk is acknowledged with gratitude.

This publication was produced with the financial support of the United Kingdom's Integrated Security Fund. Its contents are the sole responsibility of the GI-TOC and do not necessarily reflect the views of the United Kingdom.



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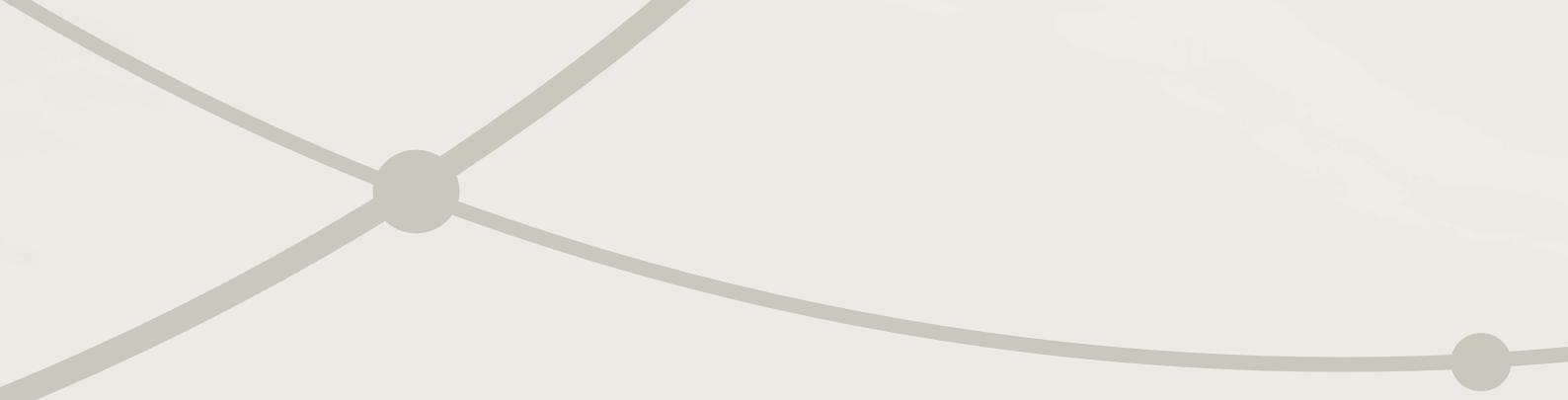
## FROM VISION TO ACTION: A DECADE OF ANALYSIS, DISRUPTION AND RESILIENCE

The Global Initiative Against Transnational Organized Crime was founded in 2013. Its vision was to mobilize a global strategic approach to tackling organized crime by strengthening political commitment to address the challenge, building the analytical evidence base on organized crime, disrupting criminal economies and developing networks of resilience in affected communities. Ten years on, the threat of organized crime is greater than ever before and it is critical that we continue to take action by building a coordinated global response to meet the challenge.



# EXECUTIVE SUMMARY

A cargo ship anchored on the Danube river close to the port of Izmil, south-western Ukraine, during the Russian invasion of Ukraine. © STRINGER/AFP via Getty Images



**T**he Danube is Europe's second longest river, flowing through 10 countries between Germany and Ukraine, from the Black Forest to the Black Sea. Throughout history, it has been the belt of *Mittleuropa*, linking the countries of western, central and eastern Europe. The Danube took on new strategic importance after Russia's full-scale invasion of Ukraine in February 2022. Danube ports in Romania, Moldova and Ukraine became a lifeline for the trans-shipment of key exports such as grain and fertilizers. Major investment in the infrastructure of ports (such as cranes and warehouses) was made during this period to support increased trade flows. However, experience shows that a rapid increase in licit activity without corresponding improvements in security can increase the risks of illicit activity.

Nevertheless, the Danube's vulnerability to organized crime has received little attention from policymakers or researchers. This may be for good reason: evidence of the risk is scarce. The last organized crime threat assessment (carried out by Europol) dates from 2011. There have been few seizures of contraband along the Danube in the past decade and, although a 2022 Global Initiative Against Transnational Organized Crime (GI-TOC) report on trafficking through ports in south-eastern Europe<sup>1</sup> flagged isolated cases of organized crime on the Danube, these fell outside the scope of that study. Is the current lack of reported criminal activity an indication of a low-risk inland waterway, or is it a reflection of limited attention and resources? After all, as the saying goes, 'you do not find what you do not seek'.

The GI-TOC, which has been monitoring the impact of the war in Ukraine on illicit economies, is well positioned to investigate this question. In September 2023, the United Kingdom commissioned this study to examine the vulnerability of the Danube to trafficking.

One of the main findings of this report is a concerning lack of law enforcement cooperation among the Danube riparian states even though most of them are co-members or partners of the European Union. This study found little evidence of trafficking on the river, due in part to a lack of data on seizures, which points to a potential security gap. However, it did discover several vulnerabilities that create a permissive environment for different kinds of illicit activity on some sections of the river.

Furthermore, the increased relevance of Danube ports – particularly in Romania, Moldova and Ukraine – because of Russia's aggression against Ukraine creates new opportunities and relevance for the river but also new challenges, including a heightened risk of organized crime. As a result, part of this report is devoted to assessing the potential risk of organized crime in the tri-border region along the lower Danube. The report concludes with a number of recommendations to reduce vulnerabilities to illicit flows of fuel, cigarettes, smuggling of migrants and other forms of organized crime along the river, and to improve cooperation between law enforcement bodies in different countries.

## Methodology

Given the lack of secondary data on illicit activity in the Danube region, most of the research in this report is drawn from fieldwork and interviews. These were conducted in Mohacs (Hungary), Chisinau and Giurgiulesti (Moldova), and Bucharest and Galați (Romania), as well as the ports of Reni and Izmail in Ukraine. Between October 2023 and March 2024, interviews were held with a range of interlocutors: from truck drivers in Ukraine to water police in Austria and Hungary, from experts on fuel smuggling in Serbia to the river administration of the lower Danube in Romania.

On 25 March 2024, an expert meeting was convened in Vienna. The meeting brought together law enforcement experts from several of the Danube border states, representatives from the Austrian Ministry of the Interior and Ministry of European and International Affairs – as President of the EU Strategy for the Danube Region (EUSDR) – as well as members of the EUSDR secretariat. Here, the authors were able to test their assumptions and findings, learn from previous experience and receive feedback on draft recommendations.





# THE RIVER

© Photo supplied

## History and relevance of one of Europe's key waterways

The Danube is a defining feature of several European capitals, including Vienna, Bratislava, Budapest and Belgrade. Stretching over 2 900 kilometres, the river has 96 ports, which cater mostly to barges and passenger boats,<sup>2</sup> making it a vital artery for trade and travel, and a popular destination for tourist cruises. Although the extensive network of ports make the Danube vulnerable to trafficking, little is known about illicit activities along the river. An overview of the recent history and trade activity along the river can help in understanding the Danube's vulnerability.



**FIGURE 1** Main ports along the Danube River.

## A corridor of trade

During the Cold War, most of the states along the Danube were under Communist rule. In the 1970s and 80s, there was major investment in locks, dams and hydroelectric power stations along the river, such as the Iron Gate dam in Romania and the Gabickovo dam in Slovakia. But while the river ran through the Iron Curtain, many ports on the Danube turned to rust.

The river found new life during the war in Yugoslavia in the early 1990s. To circumvent sanctions, fuel was smuggled on barges from Ukraine to what is now Serbia. This was big business for armed groups, criminals and their political protectors.<sup>3</sup> Unofficial estimates suggest that the total sum of illicitly laundered money from the oil trade that left Yugoslavia between 1992 and 1995 ranges from US\$5 billion to US\$11 billion.<sup>4</sup>

After the wars in Yugoslavia, and with EU expansion, efforts were made to rejuvenate the river. By 2007, when Romania and Bulgaria joined the EU, the lion's share of the river flowed through EU member states. Since Croatia (which became an EU member in 2013) joined the Schengen zone on 1 January 2023, almost half of the length of the river falls within the Schengen area. Thus, the Danube has become a means of European integration through the Trans-European Transport Network. For example, the river is part of the Rhine-Main-Danube Corridor, which will serve as the primary east-west link between continental European countries, connecting France, Germany, Austria, the Czech Republic, Slovakia, Hungary, Romania and Bulgaria. The corridor will enhance high-speed rail and inland waterway interconnections along the Main and Danube rivers, extending to the Black Sea.<sup>5</sup>

The river has gained increased relevance and attention as a result of Russia's invasion of Ukraine. The blockading of many Black Sea ports has caused distributors to seek alternative routes to get grain, fertilizers and other key exports to market. As a result, since 2022, the volume of trade through Danube ports in Moldova and Ukraine has increased, as has investment in infrastructure such as trans-shipment terminals and storage facilities. The volume of cargo shipped through the Sulina Canal doubled between 2021 and 2022, from 5 070 to 10 568 tonnes,<sup>6</sup> while the total volume of cargo in Ukrainian ports more than tripled from 5 505 to 16 505 tonnes, mostly as a result of increased grain cargoes.<sup>7</sup> The trend continued in the first two quarters of 2023.<sup>8</sup>

However, the risks have also increased, as demonstrated by Russian attacks on the Ukrainian ports of Reni and Izmail. Immediately after withdrawing from the Black Sea grain deal, Russia launched attacks on Ukraine's ports, including along the Danube, damaging port infrastructure facilities, civilian vessels and grain storage facilities.<sup>9</sup>



**Bulk carrier cargo ships navigate the Sulina Canal, a river channel between the Danube River and the Black Sea, July 2023.**

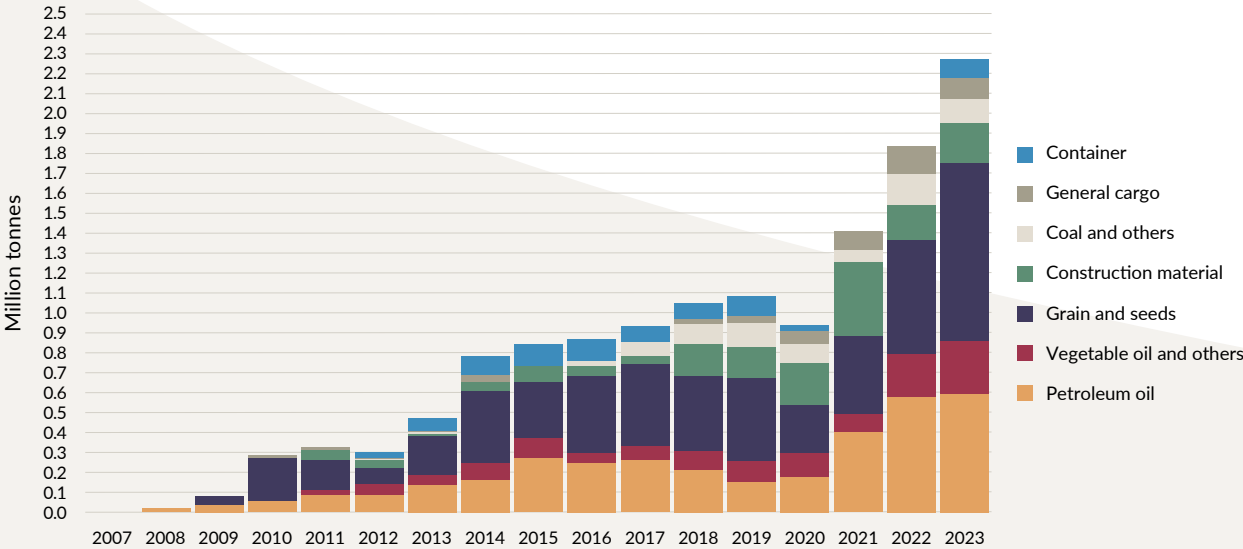
© Andrei Pungovschi/Bloomberg via Getty Images

## Regional cooperation

States bordering the river have long cooperated to ensure safety and free navigation of the river. A European Danube Commission was established in 1856, making it one of the earliest forms of multilateral cooperation in Europe. After World War II, although Europe was divided, a new Danube Commission was established in 1948 to maintain and improve the navigation conditions of the river. The resulting 'Convention regarding the regime of navigation on the Danube'<sup>10</sup> provides equal access to nationals, commercial vessels and goods from all states, ensuring equitable treatment in terms of port and navigation charges, as well as conditions for merchant shipping. However, the convention does not cover security or law enforcement cooperation. Furthermore, in the commission's work and recommendations, security is usually interpreted in the context of safety of navigation and security of ports, rather than criminal infiltration.<sup>11</sup>

A major step forward in cooperation came in December 2010 when the European Commission adopted the EUSDR.<sup>12</sup> The strategy consists of 11 priorities for addressing common challenges in the areas of connectivity, environment protection, prosperity and security for EU member states and non-EU countries.<sup>13</sup> However, thus far, the EUSDR has not resulted in significant operational responses, nor is the strategy legally binding in the same way as the convention.

Since the beginning of the 21st century, various EU programmes and funding initiatives have been directed toward modernizing navigation infrastructure, promoting environmental sustainability and ensuring compliance with international standards. Governments, foreign investors and private companies have also poured money into improving infrastructure in Danube ports. A good example is the port of Giurgiulesti in Moldova. Until 1999, Moldova (which became independent in 1991) did not have a shoreline with the Danube. This changed with a land swap agreement with Ukraine, which was completed in 1999.<sup>14</sup> As a result, Moldova received a short strip of shoreline on the Danube of less than one kilometre. Today, the port, which is owned by the European Bank for Reconstruction and Development, and operated by the Danube Logistics Company, boasts an oil terminal, two grain terminals, storage facilities and a state-of-the-art seed crushing plant (for vegetable oil). As shown in Figure 2, the trans-shipment volume through this port rose from almost zero to 1 million tonnes between 2008 and 2019, and has more than doubled since then, reaching a volume of just below 2.3 million tonnes in 2023.<sup>15</sup>



**FIGURE 2** Trans-shipment volumes at Giurgiulesti International Free Port (2007–2023).

SOURCE: Danube Logistics, Giurgiulesti International Free Port, International Logistics Hub and Business Park, May 2024, [https://gifp.md/en/wp-content/files\\_mf/17151797872024MayGIFPOverview.pdf](https://gifp.md/en/wp-content/files_mf/17151797872024MayGIFPOverview.pdf)

## Trade modalities, volumes and characteristics

Approximately 3 000 cargo vessels and 300 cruise ships actively operate on the Danube River.<sup>16</sup> Around the delta region near the Black Sea, an area of more than 4 000 square kilometres mostly located in Romania with a small portion in Ukraine, the river is deep and wide enough to accommodate maritime cargo ships arriving from the Black Sea (see Figure 3). Most vessels operating on the river are barges that carry bulk goods or fuel rather than containers, although ports along the Danube in Ukraine, Romania and Moldova have been adjusting their operations to accommodate increased container traffic since 2022.



Sling bags being offloaded from a barge in the port of Giurgiulesti, Moldova. © Photo supplied

Bulk capacity and low transport costs make the river a cost-effective means of transport for commodities such as construction materials, forestry and agricultural products (such as wheat, grains, vegetable oil and wood), scrap metal, coal, fuel, fertilizers, iron ore and steel. There are several major steel mills along the Danube in Linz, Austria; Dunaújváros, Hungary; and Galați, Romania.<sup>17</sup> From a law enforcement perspective, such cargoes are challenging to control. Smuggled items can be hidden under shipments of steel or wood transported by barge, in cargo sling bags used to carry fertilizer or salt, or in consignments of gravel or grain in addition to empty spaces in the structure of the barge itself. Doing a thorough check would require completely unloading the cargo, which is neither cost- nor time-effective.

The Danube is appealing to the transport industry for several reasons. Firstly, it offers lower shipment costs than alternative modes such as road or railway transport. Additionally, water transport enables the movement of large volumes of goods, particularly bulk cargo,

*Increased investment and efforts to enhance cooperation could make the Danube more attractive for organized crime.*

surpassing the capacity of other modes of transport. For example, it is common for a self-propelled 'push boat' to push a convoy of four to six barges. The safety of navigation is considered high, especially when compared to dangerous roads in, for example, Romania and Ukraine. Furthermore, investments in recent years – partly as a result of EU enlargement and the displacement of trade caused by Russia's invasion – have led to improvements in the infrastructure of several Danube ports and the hinterland. For example, links to road and rail networks have integrated the river more tightly into regional transport networks and corridors.<sup>18</sup>

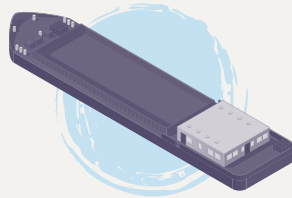
However, transport along the Danube is not without its weaknesses. One is the slowness of moving goods, which affects the timeliness of deliveries. There are 18 locks on the river and some ports have a limited number of mooring sites. The process of crossing borders can be time-consuming.<sup>19</sup>

The EUSDR has taken steps to simplify and harmonize administrative processes by introducing Danube Navigation Standard Forms (also known as DAVID forms). As a result, arrival and departure reports, the crew list and the passenger list are now standardized and accessible on a common website. A Central and Eastern European Reporting Information System (CEERIS) has also been developed to simplify reporting requirements about the ships, their contents and journeys. CEERIS reduces bureaucratic burdens for ship operators while increasing transparency for border police and customs agents. However, it is not obligatory on all sections of the river and because countries have differing data protection laws, they do not share complete information.

There are also complaints of insufficient infrastructure and equipment, both in the ports and at the interface between ports and the interior, for example road and rail links. A glaring example is the long queues at borders in the tri-border region of Romania, Moldova and Ukraine since February 2022. What were supposed to have been EU-Ukraine Solidarity Lanes have become traffic jams. Because of the limited number of roads and crossings, plus increased traffic, it can take trucks days to move just a few kilometres to cross borders, a process that can reportedly be speeded up with small bribes to border forces.<sup>20</sup> On the one hand, small port towns in the tri-border region do not have the necessary infrastructure, such as bridges and roundabouts, to cope with the increased volume of trade. On the other hand, low-paid border forces are not incentivized to make an extra effort to deal with the congestion, fuelling exposure to bribery.<sup>21</sup>

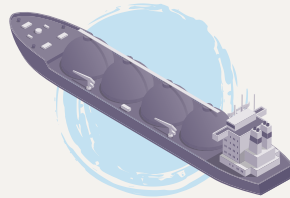
Another limitation is the low density of waterways compared to alternative transport modes, which may restrict accessibility to some regions. In some Danube states, insufficient maintenance of the river poses navigational challenges, hindering the smooth operation of water transport systems. Furthermore, some parts of the river are highly affected by hydrological and meteorological conditions such as low water levels, freezing and natural changes in fairway depth. Bridge heights limit the amount of container layers that can be stacked onto ships. Modernization of fleets is expensive, which helps to explain why many of the barges in service date from the 1960s and 1970s and use diesel-guzzling engines.

Depending on the combination of their propulsion systems and cargo holds, five types of cargo vessels are used on the Danube and its navigable tributaries. The visual below illustrates them.



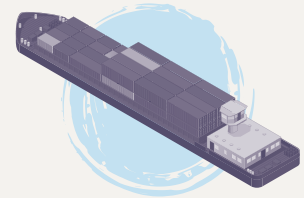
### Dry cargo ships

Transportation of a wide variety of goods including log wood, steel coils, grain and ore. These vessels can generally carry between 1 000 and 2 000 tonnes of goods and are often used on the Danube in coupled formations or pushed-coupled convoys.



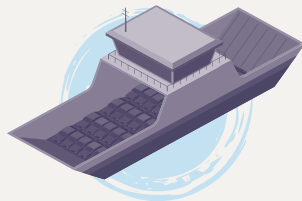
### Tankers

Transportation of mineral oil and derivatives (petrol, diesel, heating oil), chemical products or liquid gas.



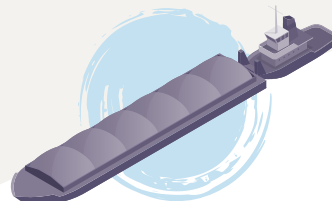
### Container ships

In the Danube region, container convoys with four 'pushers' are regarded as the best way to increase capacity. Such a pushed convoy has a total loading capacity of up to 576 TEU.



### Ro-ro ships

The most important types of goods transported in this way include passenger cars, construction and agricultural machinery, articulated vehicles and semi-trailers ('floating road') as well as heavy cargo and oversized goods.



### Pushed convoys

They consist of a motorized vessel used for pushing, and one or more non-motorized 'pushers' that are firmly attached to the pushing unit.

**FIGURE 3** Types of cargo vessels commonly used on the Danube.

The predominant method for cargo shipping on the Danube involves the use of convoys, including pushed convoys, coupled formations and pushed-coupled convoys, with individual motor cargo vessels representing a minor portion of the total. The fundamental principle guiding convoy formation is to group vessel units in pushed convoys in a manner that minimizes water resistance during motion or ensures sufficient stopping and manoeuvring capabilities, particularly when navigating downstream. To reduce resistance, the lighters are arranged in a staggered configuration towards the rear.<sup>22</sup>

While low security levels and limited police attention might attract criminal activity, some of the characteristics that make the Danube less attractive for trade also make it less appealing for criminals. To ensure smooth illicit trade, criminals seek efficiency and low risk. The Danube may be low risk, but the poor links to transport connections, such as roads and logistics services, also make it less efficient than shipping illicit goods through seaports. And land borders are more plentiful and faster to cross than the borders along river.

In summary, while the Danube has taken on new significance due to EU enlargement, the trend towards a greener economy and the war in Ukraine, since 2019 there has not been a significant increase in the volume of cargo turnover in most Danube ports, with the notable exception of Ukraine and, to a lesser extent, Bulgaria and Serbia.

Nevertheless, increased investment in infrastructure and greater efforts to enhance cooperation could unlock the potential of the river. At the same time, these factors could make the Danube more attractive for organized crime.

Ports (tonnes)	2019	2020	2021	2022	2022 Q1+Q2	2023 Q1+Q2
Germany	3 274	3 511	2 999	2 410	1 370	1 047
Austria	6 452	6 050	6 356	5 363	3 252	2 506
Slovakia	1 664	1 553	1 846	1 934	952*	810*
Hungary	6 064	6 742	5 715	4 063	1 356	1 746
Croatia	814	948	697	582	338.8	186.4
Serbia	9 735	8 164	13 610	12 023	6 366	6 628
Bulgaria	5 385	5 431	7 111	7 104	3 751	4 004
Romania	28 474	27 307	28 457	24 355	12 976	13 053
Republic of Moldova	1 299	1 185	1 819	2 144	1 140	1 238
Ukraine	5 629	4 055	5 505	16 505	5 102	15 146

**FIGURE 4** Cargo turnover of the Danube ports, 2019–2023.

NOTE: \*Denotes the ports of Bratislava and Komarno.

SOURCE: Pyotr Semyonovich Suvorov, Market observation for Danube navigation, results in 2022, Danube Commission, 2023, p.2, <https://www.danubecommission.org/dc/en/danube-navigation/market-observation-for-danube-navigation/market-observation-for-danube-navigation-results-in-2022/>





# VULNERABILITIES OF THE DANUBE TO ORGANIZED CRIME

A Hungarian customs official checks a grain cargo in the port of Mohacs. © Photo supplied

## How big is the problem?

There is little evidence of trafficking along the Danube River. There have been few seizures, for example, of drugs, cigarettes and fuel, and most discoveries of illicit activity have been by accident. For example, in March 2019, Romanian authorities seized more than one tonne of cocaine, but only after the ship that was transporting it capsized in the Danube Delta.<sup>23</sup> In October 2021, almost 3 million packages of untaxed cigarettes were found in bags of salt on a barge in Paks, Hungary, when one of the straps of the sling bag that they were hidden in snapped when being unloaded.<sup>24</sup> In July 2018, Serbian police seized 575 tonnes of undeclared oil; in August 2019, 200 tonnes of contraband diesel; and in November 2021, 50 tonnes of untaxed petroleum products.<sup>25</sup> Although these are rare cases, the size of the loads suggests that this was not the first time that criminals had used these routes or modalities. In particular, in the case of the discovery of cigarettes in Hungary, investigators concluded that it could not be ruled out that there had been four previous similar shipments between February and July 2021.<sup>26</sup>

The difficulty of carrying out controls on barges is a major vulnerability. Another is the fact that both ends of the river are linked to seaports where there are few controls of trans-shipped goods before they enter the Danube. For example, the cocaine that was seized in the Danube Delta in 2019 was shipped from Brazil via the port of Constanta in Romania.<sup>27</sup>

The low number of seizures could be the result of inattention to trafficking on the Danube. There is no dedicated trans-Danubian law enforcement network, the last serious organized crime threat assessment of the river (by Europol) seems to be from 2011 (but is not publicly available), and there is almost no research on the topic. When it comes to fighting crime, attention and resources of the riparian states are devoted to other priorities such as cocaine smuggling through western European ports, smuggling of migrants across land borders and, to a lesser extent, organized crime in the Western Balkans or shifts in illicit economies in the Black Sea region. An annual joint operation of riparian states, known as DARIF, which takes place over several days and involves hundreds of law enforcement personnel from 10 countries, usually results in just a few arrests and fines, but has found little evidence of serious organized crime.

Nevertheless, as a number of experts observed in interviews for this report, 'the fact that almost nothing is being found does not mean that there is nothing to find'.<sup>28</sup> Furthermore, if organized crime is not a serious problem along the Danube, it would be good to keep it that way. Therefore, rather than focusing on a number of law enforcement operations or major seizures, this section assesses vulnerabilities to organized crime and explores the indications of the types of illicit activity that takes place on the river.



A security motorboat patrols the Reni river port in the Odesa region of Ukraine, July 2022. © Sergii Kharchenko/NurPhoto via Getty Images

## Types of crime

Following the example of the International Commission for the Protection of the Danube River, which divides the Danube into three sub-regions based on its gradients, it is helpful to divide the river into three sections to better analyze different criminal markets.<sup>29</sup> The first section, section A, stretches from the Rhine-Main-Danube Canal in Germany and the Netherlands to the Schengen border around Mohacs, Hungary, or Vukovar, Croatia. Section B goes from the tri-border region of Hungary, Croatia, and Serbia to Braila in Romania. Section C covers the tri-border area of Romania, Moldova and Ukraine.

### Drug trafficking

Section A is arguably the least analyzed section of the river because it is considered safe, but also because there are few controls. There have been some seizures of cannabis in containers in the past (by accident), as well as problems with theft of motor boats. While there are seldom seizures of cocaine or synthetic drugs, this may be because so few checks are performed on containers moving from North Sea ports to the Danube via the Rhine-Main-Danube Canal, allowing drugs to easily move through. Furthermore, boats moving down the upper part of the Danube do not face any border controls until they reach the Schengen border at Mohacs or Vukovar, but even here they are seldom checked on the way out of the EU. In other words, unless police have a tip-off, there is little reason to check loads moving between the

Netherlands, Germany and the Schengen border. This makes the upper part of the river vulnerable to trafficking of synthetic drugs and precursors from west to east. For example, a considerable quantity of synthetic drugs come to Serbia and Bulgaria from the Netherlands. Some of this trade may move via the Danube.

This upper part of the river, particularly between Bavaria and Hungary (via Slovakia) has a high volume of cruise ships. Water police have indicated some concerns with wanted persons on board, forged travel documents (for example of crew members), as well as possession of small quantities of drugs.<sup>30</sup> There is a relatively high turnover of hospitality staff on cruise ships, few checks, and relatively low salaries, which create some vulnerability to criminal influence. But the risk is assessed as relatively low.

### Smuggling

Section B, the middle section of the river, faces different challenges, namely smuggling of fuel and migrants. Relatively high fuel prices in Serbia make it vulnerable to smuggled fuel usually originating from Ukraine, Moldova or Croatia. According to a 2024 GI-TOC study, there are almost 40 locations along the 588 kilometres of the Danube River that pass through Serbia at risk of fuel smuggling.<sup>31</sup> Customs officers at the port of Ruse, Bulgaria, near the border with Serbia, made 35 fuel seizures in 2021 and 39 in 2022, confiscating more than 74 tonnes of illicit petroleum

products during that period.<sup>32</sup> Between 2018 and 2022, Serbian police seized 1 861 tonnes of petroleum products in 410 cases of fuel smuggling.<sup>33</sup> Some of the smuggling is small-scale, for example selling small amounts of fuel in canisters to local drivers or fishermen. But others are industrial-scale operations: ships (often turning off their transponders) illegally carry excess fuel, which they transfer to barges that then dock in pre-arranged locations along the Danube and sell the fuel to tanker trucks that take it to local petrol stations.<sup>34</sup> As of 2025, when an EU exemption expires, Bulgaria is expected to stop exporting crude oil from Russia. This could create new incentives for smuggling fuel along the Danube.



A crew member inspects a barge carrying oil at the port of Mohacs, January 2024. © Photo supplied

The middle section of the Danube is also vulnerable to the smuggling of migrants, usually from Romania and Bulgaria to Serbia, or from Serbia to Croatia and Hungary. For example, in March 2024, a Europol operation led to the arrest of several smugglers who were trying to move migrants from Bulgaria across the Danube by boat to Romania, and from there to Hungary.<sup>35</sup> Smugglers also try to move in the opposite direction, across the Serbian border (around Kladovo or Tekija) into Romania.<sup>36</sup> Another active area is the triangular border region between Bosnia and Herzegovina, Serbia and Croatia. Migrants try to cross the border from Serbia to Croatia (particularly around Batina and Dalj) or across the Sava River.<sup>37</sup> Some refugees and migrants have died attempting the crossing.<sup>38</sup> Bilateral cooperation between Croatia and Serbia is complicated in this area because the border region along the Danube is still disputed.

## Other crimes

Section C, with the lower reaches of the river around the delta, is the most dynamic and the most vulnerable to organized crime. Ukraine's Danube ports are in a relatively remote region of the country, below Moldova and south-west of Odesa, that has been somewhat neglected since Ukraine gained independence in 1991. The region has been described as 'a smuggler's paradise of sprawling wetlands and loosely policed borders'.<sup>39</sup> The cities of Reni and Izmail are only accessible to the rest of Ukraine by two roads to the east, and a cumbersome border crossing by Moldova to the west.

This ethnically diverse region, known historically as Bessarabia, has its own ecosystem of economic survival and governance under the control of local business and political elites. In exchange for loyalty to the central government, these elites have been more or less left alone<sup>40</sup> to control businesses in the area, including the ports on the Danube. There have also been accusations of corruption by local officials.<sup>41</sup> As a result, one of the biggest risks in the region is corruption as well as smuggling of a wide range of goods either into or out of the ports. The proximity to the break-away region of Transnistria is also a risk factor.

The dramatic increase in licit trade through ports in the tri-border region of Romania, Moldova and Ukraine brings with it risks for an increase in illicit trade. For example, since 2022, there have been accusations that fuel from Russia has been imported to Romania and Moldova and then resold by those countries to Ukraine.<sup>42</sup> Although there have been few seizures of any illicit goods in the region in the past few years, law enforcement is weak and corruption is rampant. The major risks in this region include the smuggling of cigarettes (including those illegally produced in Moldova and Ukraine), synthetic drugs (which is a growing market in Ukraine), as well as weapons. There have also been reports of cannabis cultivation in the Danube Delta.<sup>43</sup>

## Security gaps

When authorities discuss security on the Danube, they usually refer to navigational safety. There is little attention to security in terms of illicit trade and organized crime.

Police and customs officers carrying out border controls generally check the paperwork of the ship and its crew, but these checks are not very effective due to the limitations of the information-sharing platforms and challenging dynamics of the barges themselves. The fact that not all countries or ships use the CEERIS system means that border police often receive information about an approaching ship just a few hours before it arrives, which limits their ability to conduct a proper risk assessment and background checks of the vessel, its cargo and crew. This also violates the Schengen border code, which says information should be received at least 24 hours ahead of time. This customs risk may be reduced with the roll-out of the EU's new Import Control System 2, which is a pre-arrival security and safety programme that will enable more effective information-sharing.<sup>44</sup> However, the challenge will be to harmonize national laws and procedures with this system.

Unlike containers, barges cannot be x-rayed, which means controls must be performed manually or with the assistance of a sniffer dog. The average search of a barge, for example in Mohacs, is around 40 minutes. This includes physical checks of cabins

*'A smuggler's paradise of sprawling wetlands and loosely policed borders.'*

and storage spaces and inspecting cargoes of, for example, wheat and gravel with an avalanche pole. More sophisticated instruments include hand-held x-rays and endoscopes, as well as dosimeters to measure radioactive levels.<sup>45</sup> Sniffer dogs are effective, but the noise and smells of a barge can be overwhelming after a period of time and the dogs need to rest.<sup>46</sup> Furthermore, smugglers are adept at hiding contraband in ways that make it difficult for dogs to detect, as in the case of cigarettes stashed in cargo sling bags (often referred to as 'big bags') of salt. Sniffer dogs are also expensive to train and maintain, and in short supply among border police along the Danube.



A Hungarian customs officer performs an inspection of the engine room of a barge docked at the port of Mohacs, January 2024. © Photo supplied

Visual surveillance is limited along the Danube. More surveillance equipment would reduce the risk of piracy and theft from ships, the smuggling of migrants (either onto boats or crossing the river) and illicit docking,

especially for fuel smuggling. While covering the entire stretch of river is unnecessary, unrealistic and prohibitively expensive, more effective use of cameras – for example, in known hotspots for fuel smuggling – could shine light on the activities of ships that turn off their transponders.

In some Danube states, customs and border police are regularly rotated: they may spend some weeks monitoring land borders, and others controlling the river. This system is intended to reduce the risks of exposure to corruption, but it also reduces the likelihood that officials develop specific skills to search barges and gather intelligence. For example, in Moldova – which has a shoreline of less than one kilometre – border police and customs officers do not seem to have received specialized training in searching ships.<sup>47</sup> In several countries along the river it was noted that police and customs officials have received standard training for dealing with containerized cargo, but not specialized training on inland waterway security, such as how to search a barge.<sup>48</sup>

Concerns have also been expressed about varying standards of border control. For example, since Croatia joined the Schengen zone on 1 January 2023, border controls in Vukovar are considered more superficial than those carried out in Mohacs.<sup>49</sup>

Spot controls at other points along the river are rare, partly because law enforcement has few suspicions of illicit activity and partly because water police have few boats. For example, Serbia has only three functional patrol boats to monitor almost 600 kilometres of river.<sup>50</sup> This is risky because while security is focused on ports and border crossings, it is quite easy for small boats to transport contraband from larger vessels at almost any point along the river.

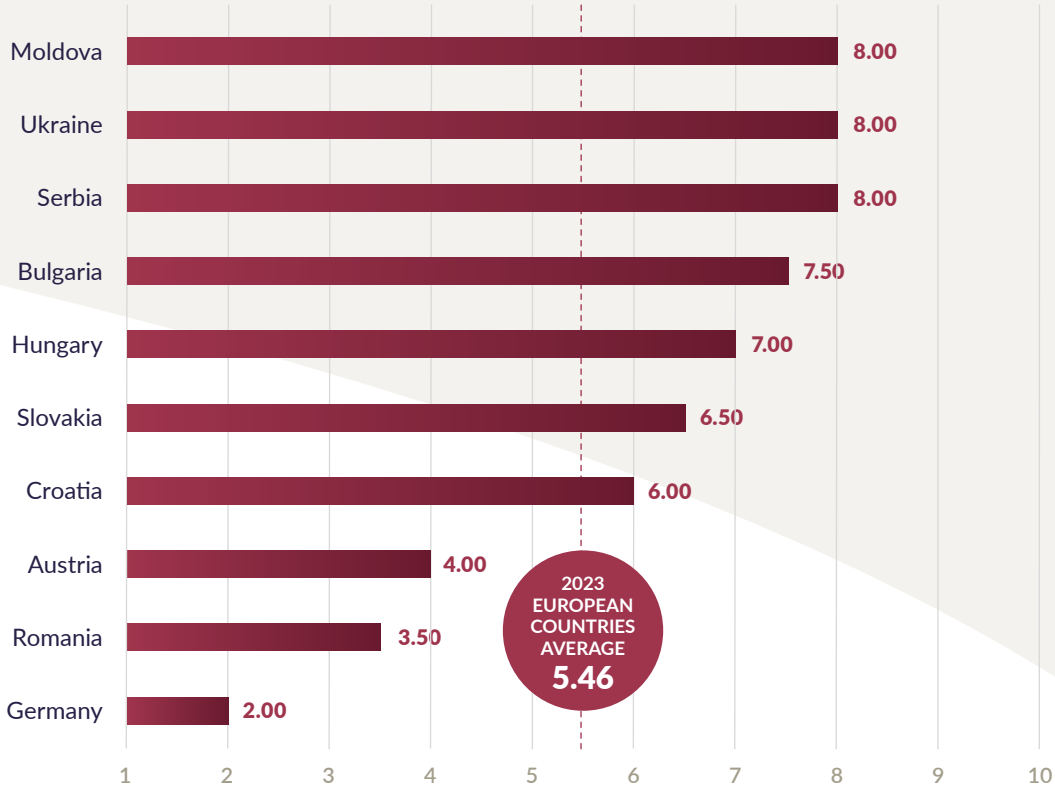
## Ships in the night: Intelligence gaps

The lack of attention to trafficking on the Danube is compounded by a lack of data. There is little national data about seizures, and no common database or coordination centre for compiling and analyzing information about illicit activity on the river. There also seems to be little sharing of criminal intelligence.

Most Danube states have access to Europol's Secure Information Exchange Network Application.<sup>51</sup> However, experience shows that Danube states mostly use the system to follow investigative leads and request

information from partner countries. It is seldom used, for example, to exchange information on criminal modalities, trends, or suspicious ships or enablers. For example, in the case of 2.8 million boxes of smuggled cigarettes discovered in Paks, Hungary, in October 2021, it later emerged that Romanian investigators had been aware of the methods used by the smugglers (namely hiding the cigarettes in bags of salt) as a result of a case where they seized a similar cargo on two barges being pushed from Reni, Ukraine, to the ports of Braila and Galați in Romania. However, the information was not shared.<sup>52</sup>

Lack of trust is a concern when it comes to sharing intelligence. Some of the countries most vulnerable to trafficking are also seen as the most corrupt or prone to criminal infiltration. For example, Moldova, Serbia and Ukraine score an 8 out of 10 for state-embedded actors according to the Global Organized Crime Index 2023. As one law enforcement official observed, 'It is counter-productive to share information if people are corrupt.'<sup>153</sup> The counter-argument is that security can be jeopardized if there is no information sharing at all.



**FIGURE 5** Country scores for state-embedded actors.

SOURCE: Global Organized Crime Index 2023, GI-TOC, September 2023, ocindex.net.

## Law enforcement cooperation: Many plans, little action

Law enforcement along the Danube is predominantly treated as a national issue. However, such national responses are insufficient since a significant proportion of crime committed on the river is cross-border. One customs official observed: 'This is a transnational issue because it involves commodities moving along a river that flows across borders, but the responses are strictly national.'<sup>154</sup>

As noted, law enforcement is not one of the topics covered by the Danube Commission. Therefore, cooperation tends to be bilateral and ad hoc, usually relating to border management rather than intelligence sharing or joint operations. For example, there seems to be good cooperation between border and customs officials in Hungary and Croatia. In contrast, there is scope for better cooperation between Romania, Moldova and Ukraine in the tri-border region, not least because the ports of Galați, Giurgiulesti, Reni and Izmail are closely situated and face similar challenges. More generally, while some countries along the Danube have good law enforcement cooperation at land

borders, including the bilateral exchange of liaison officers, there is less cooperation on the river. A 2022 survey involving around 200 law enforcement officials responsible for policing the Danube concluded that there are almost no joint investigations, risk analysis, or training and exchange programmes.<sup>55</sup>

Several Danube states are part of Europol and those that are not (such as Moldova, Serbia and Ukraine) have operational agreements. Most are also part of Aquapol, which is a network of water police, but its activities are not well known nor do they seem to be very operational. Furthermore, all Danube states, except for Ukraine, are parties to the Police Cooperation Convention for Southeast Europe (signed in 2006).

There is greater scope for cooperation, especially among riparian states that are EU members. After all, European Integrated Border Management (EIBM) is designed to enhance coordination and cooperation among all relevant authorities and agencies involved in border security and trade facilitation to establish effective, efficient and coordinated border management at the EU's external borders.<sup>56</sup> EIBM is based on three pillars, all of which can be applied to closer law enforcement cooperation along the Danube: intra-service, inter-agency and international cooperation.<sup>57</sup> For example, inter-agency cooperation could be improved by making more effective use of Police and Customs Cooperation Centres (PCCCs) along the river. At the moment, most PCCCs are located along land borders, so they rarely deal with offences committed on rivers. Furthermore, chain requests cannot be launched through them, so non-adjacent Danube countries cannot be contacted directly. More PCCCs on the Danube and a network of Danube-based PCCCs, as well as bilateral or trilateral common contact offices at key nodes, could enhance law enforcement cooperation. International cooperation could be improved by EU members working with non-EU countries, such as Serbia, Moldova and Ukraine, to harmonize their legislation and practices relevant to EIBM.

Proposals have been made in the past to enhance law enforcement cooperation along the river. Between 2013 and 2015, Hungary – with support from the European Commission and in cooperation with Bulgaria and Germany – carried out a project on 'Setting up the Structure of a Danube River Forum', referred to as DARIF.<sup>58</sup> The proposal, based on extensive consultations in working groups, suggested the creation of a consultative Forum System for sharing information, risk assessments and good practices, and a Danube Law Enforcement Coordination Centre (in Mohacs). Hungary even signed an


agreement with Croatia in October 2012 on the operation of the Danube Law Enforcement Coordination Centre.<sup>59</sup> However, no other states took up the offer to accede to the agreement. One of the few legacies of this initiative is the annual DARIF joint operation days organized by the Ministry of the Interior of Hungary.

More recently, in 2019 the EUSDR developed targets to help achieve priority actions of the 2010 action plan, namely 'to work together to promote security and tackle organised and serious crime'.<sup>60</sup> Among the objectives are: enhancing police cooperation with the aim of improving security and tackling serious and organized crime in the EUSDR countries; developing strategic long-term cooperation between law enforcement actors along the Danube River by strengthening networks for cooperation by 2020; improving the systems of border control, document inspection management and cooperation on consular related issues in the Danube region; and promoting the rule of law and the fight against corruption.

Several action items in the updated plan include: enhancing cooperation between police units on an operational and ministerial level to combat cross-border crime in the Danube Region; intensifying police cooperation in information security and combating cybercrime and hybrid threats; exchanging experience, networking and cooperation in the field of smuggling, and addressing trafficking of humans, drugs, excise goods and firearms. There are even specific recommendations to promote strategic long-term cooperation between law enforcement actors along the Danube River by enhanced networking, including by establishing a network of contact and coordination centres along the Danube River, and enhancing cooperation between water police units in the Danube region.<sup>61</sup> However, as with the Hungarian proposal in 2015, this objective has not been achieved.

The problem seems to stem in large part from a lack of political will. It is revealing that according to a survey, law enforcement officials regard 'slow political decision-making' as the main obstacle to enhancing law enforcement cooperation on the Danube.<sup>62</sup> This creates a vicious circle: devoting few resources to trafficking along the Danube results in few seizures, and few seizures mean that trafficking is de-prioritized, with little political or public attention given to the Danube's vulnerability. Lack of attention increases the risk of the river becoming a blind spot for law enforcement and a low-risk artery for traffickers. However, the war in Ukraine could be a game-changer, drawing attention to increased risks on the Danube.





# TRI-BORDER REGION: ROMANIA-MOLDOVA- UKRAINE

A queue of trucks en route to Ukraine at the Isaccea-Orlivka border crossing in Romania, July 2023. © Andrei Pungovschi/Bloomberg via Getty Images

## An ecosystem conducive to smuggling

The most dynamic section of the Danube – and the stretch most likely to be exposed to criminal activity since the Russian invasion in February 2022 – is the lower part of the river that flows through eastern Romania, Moldova and Ukraine. In this region, instances of corruption have arisen within the grain corridor and ports of Reni and Izmail. After the invasion, these ports experienced an increase in reports of smuggling and drug trafficking activities, as well as a significant increase in cargo volumes and port calls because of the blockade of Odesa's port.<sup>63</sup>

The area was already notorious for smuggling prior to the war. Criminals from a number of different ethnic groups are active, with Bulgarian and Gagauz gangs especially prominent. The region is affected by illicit economies from the Odesa region as well as Moldova – particularly smuggling from Gagauzia and the break-away region of Transnistria – as well as the schemes of local strongmen. The EU was concerned enough about illicit activity in the region to deploy a Border Assistance Mission to Moldova and Ukraine (EUBAM) starting in 2005.



**FIGURE 6** The most vulnerable section of the Danube is the one that flows through the tri-border region of Romania, Moldova and Ukraine.

One of the biggest problems is the smuggling of cigarettes, including those illegally produced in the region. It has been reported that out of the 3.3 billion cigarettes imported to Moldova (population 2.6 million) in 2020, about 1.45 billion – almost half – went to the Transnistrian region, which only has some 300 000–350 000 inhabitants.<sup>64</sup> From August until October 2021, Moldovan, Ukrainian and Romanian law enforcement agencies working with EUBAM and the European Anti-Fraud Office seized 8 544 780 cigarettes, many near the Transnistrian region.<sup>65</sup> Those involved in this illicit trade seem to have portable skills. For example, in October 2023, a joint operation by Czech, Moldovan and Romanian law enforcement officials busted a transnational organized criminal group that was clandestinely producing cigarettes in the Czech Republic; almost 18 million

cigarettes were seized and 22 foreign nationals (mostly Moldovans and Ukrainians) were detained.<sup>66</sup>

In the past, some businesses have smuggled goods into and out of Moldova via Transnistria to avoid customs duties. In one scam in 2006, EUBAM took down a ring of businesses smuggling tonnes of frozen chicken meat into Moldova to be resold in Ukraine.<sup>67</sup>

The Palanca and Tudora border crossings are known as a hub for human trafficking, a risk that has increased as a result of the war, in particular due to Ukrainian men being smuggled across the border to avoid conscription.<sup>68</sup> There have also been accusations that, since 2022, factories in Transnistria have tried to sell dual-use products to the Russian military-industrial complex.<sup>69</sup>

## Transnistria: 'black hole' or 'opportunity space'?

Much of the economy of the break-away region of Transnistria is controlled by the Sheriff company. The company, started by two former policemen, controls supermarkets, gas stations, construction companies, hotels, a mobile phone network, bakeries, a distillery, as well as a mini media empire of radio and TV stations. Sheriff even sponsors a football team that once qualified for the Champions League. Sheriff is closely connected to the ruling Obnovlenie party. In the words of one expert: 'As a result of their subsequent state capture and monopolization of the consumer sector, what was once viewed as contraband now forms an integral part of Transnistria's economy.'<sup>70</sup>

Others take a different view of the governance in Transnistria. In a 2021 interview, former Transnistrian 'foreign minister' Valery Litskaï quipped, 'It's better to have a corporation of police than a corporation of bandits.'<sup>71</sup> In the shadow world of Transnistria, however, it is often hard

to tell the difference. And yet, while officials in Chisinau often like to depict Transnistria as a black hole of criminality, according to an EU official, in the past the region was more like a 'comfort zone that served the interests of key players in Chisinau, Tiraspol and Ukraine'.<sup>72</sup> For example, former Moldovan government official Vladimir Plahotniuc has been accused of engaging in state capture 'by exerting control over and manipulating key sectors of Moldova's government, including the law enforcement, electoral and judicial sectors'.<sup>73</sup> One such scheme enabled the opening of duty-free stores in Transnistria. Between December 2015 and November 2016, these shops introduced 1.32 billion cigarettes yet registered sales of only 639.5 million.<sup>74</sup> There were concerns that the surplus was being traded on the black market and smuggled into the EU. Yet fines for smuggling were very low. As a former EUBAM official points out, 'this was like decriminalizing smuggling'.<sup>75</sup>



A local officer checks bus passengers entering the region. © Daniel Mihailescu/ AFP via Getty Images

The region, including the ports of Izmail and Reni in neighbouring Ukraine, has also been notorious for a shadow economy controlled by local strongmen, in particular Oleg Popescu, also known as 'The Romanian'.<sup>76</sup> According to investigative reporting in the region, Popescu has been implicated in a series of crimes in Bessarabia, including extortion, smuggling of cigarettes and cannabis, and a string of alleged contract killings.<sup>77</sup> After the Russian invasion, Popescu reportedly created two smuggling channels through the ports of Reni and Izmail. The first involved a cigarette channel from Moldova to Ukraine (since many Ukrainian tobacco factories have been lost), and counterfeit cigarettes to Romania and further to the EU via Reni. The second channel saw the export of homemade synthetic drugs into Romania and other EU countries using recruited mules from grain ship sailors at Reni. Popescu was also reportedly in charge of a scheme by which trucks could pay to skip the hours-long line to unload their grain cargo at Reni port.<sup>78</sup>

## An awakening of Danube ports

Russia's full-scale invasion of Ukraine made this neglected and remote region suddenly relevant as Danube ports provided a badly needed outlet for Ukrainian exports, such as wheat and fertilizer. As the head of the Ukrainian sea ports association put it: 'These ports operated in a kind of Soviet version – they had three ships a week, then suddenly there were 30!'<sup>79</sup>

When Odesa and other key Black Sea ports were blockaded as a result of Russia's invasion in February 2022, some trade shifted to Danube ports such as Reni, Izmail and Ust-Dunaysk. Between January and October 2021, Ukraine's Danube ports handled 4.4 million tonnes of cargo compared to 12.6 million tonnes during the same period in 2022 – an almost three-fold increase.<sup>80</sup> This amount doubled again the following year: between January and October 2023, Ukraine's Danube ports handled 27.6 million tonnes of cargo. In short, there was a six-fold increase in trans-shipment through Ukraine's Danube ports in just two years. Most of the cargo handled was grain, followed by iron ore and vegetable oil. The number of vessels handled in Ukraine's Danube ports in the first 11 months of 2023 increased to 13 000, up from 8 944 in the same period in 2022.<sup>81</sup>

There were other knock-on effects. Trans-shipment through the Moldovan port of Giurgiulesti increased significantly, while the number of ships passing through Romania's Sulina Canal, a tributary of the Danube, increased by 50 per cent. Furthermore, 12 new trans-shipment points were opened on the Danube, new grain terminals and warehouses were constructed (for example in Izmail), and upgrades were made at the port of Galați to reduce the impact of the Black Sea blockade. The cost of used river barges went up as companies scrambled for greater capacity.



The port of Galați, Romania, has been upgraded to accommodate increased cargo traffic. © Ioan Cepaliga/Wikipedia

This boom in trade led to traffic jams of barges on the river and of cars and trucks on the roads leading to and from the ports. Some changes were quickly made to address these challenges. More pilots were hired in Romania and Ukraine, the clearing of ships became a 24/7 operation and new storage facilities were built. The withdrawal of Russian troops from Snake Island at the end of June 2022, after a sustained Ukrainian attack, made it safer for ships to enter the Bastroe Canal, which runs between the Black Sea and the Danube.<sup>82</sup> This helped to unblock a logjam and significantly increased the number of port calls along the Danube. In an effort to allow more vessels into the canal, in February 2023 Ukraine announced that it had increased the permissible hull depth of ships passing through the Bastroe Canal from 3.9 to 6.5 metres.<sup>83</sup> It is estimated that this could increase Ukraine's exports via the Danube by another 500 000 tonnes per year.

Prior to the war, sailors were replaced by grain growers, but the rapid increase in trans-shipment through Danube ports led to an influx of workers at the ports. This had a major impact on the affected communities, including an increase in land and rent prices and major congestion along roads.<sup>84</sup>

Traffic jams along borders created a golden opportunity for corruption. Truck drivers interviewed for this report complained of having to pay bribes to customs officers and border police when entering Moldova and Romania.<sup>85</sup> There are also allegations of large-scale corruption concerning the export of grain through shell companies.<sup>86</sup> This is symptomatic of the fact that a major increase in activity in the region was not accompanied by a corresponding increase in border management, law enforcement and anti-corruption measures. For example, while trans-shipment increased significantly in the port of Giurgiulesti in Moldova, there was no major increase in investment in security. The port's status as a free port seems to create some confusion about who is responsible for security within the port. Trucks coming in or out of the port are seldom scanned and customs officials have limited training and resources to carry out controls.<sup>87</sup>

After the Black Sea Grain Initiative collapsed in July 2023, Russia began bombing the Ukrainian Danube ports of Reni and Izmail.<sup>88</sup> More than 30 attacks occurred in the next six months, damaging infrastructure and tens of thousands of tonnes of grain. As a result of increased risks and the costs of repairing the damage of the attacks, freight rates in Reni and Izmail increased.



A grain warehouse damaged by a Russian drone attack in the port of Reni, August 2023. © Press Service of the Operational Command South of the Ukrainian Armed Forces/Handout via Reuters

## Future risks

Since late 2023, Ukraine has managed to push back Russian forces in the Black Sea to the point that it has been able to reopen a safe route along the coast of Turkey, Romania and Bulgaria. As a result, it is expected that the amount of cargo flowing through Danube ports will be reduced.<sup>89</sup> While licit trade through Danube ports may decline after the war, there could be an increased risk of organized crime. As described in a 2024 GI-TOC report, during the war, Ukraine has been a destination for vast amounts of weapons. Thus far, there are few signs of many of these weapons leaving the country since demand is high. However, if one compares the market for small arms and light weapons to a sponge, a reduction in demand in Ukraine could result in the market for guns being squeezed and flowing out in several directions – including down the Danube.<sup>90</sup> It is therefore vital to work with law enforcement and port authorities now to install sufficient security precautions.

The war has also seen a shift in drug trafficking routes.<sup>91</sup> As indicated by the Global Organized Crime Index, Ukraine's synthetic drug market saw the largest increase of any drug market in the world in 2023.<sup>92</sup> Supply or diversion of this market could have an impact on the Danube states. There are also indications of an increase in cigarette trafficking from Moldova<sup>93</sup> and Ukraine,<sup>94</sup> which is flooding the market with cheap cigarettes and depriving these states of tax revenue. Bessarabia is also an important source of cannabis for Ukraine, Moldova and the wider region.<sup>95</sup>

Closer EU accession could help to build capacity among relevant officials in Moldova and Ukraine, harmonizing Moldovan and Ukrainian laws and practices on customs

and border management with the EU *acquis*: for example, the Excise Movement and Control System that records and monitors the movement of excise goods (such as alcohol, tobacco and energy products) as well as a System of Exchange of Excise Data, an online register of economic operators that enables users to verify the validity of a given excise number and what category of goods the operator in question is authorized to trade. This should reduce the risks of fraud and counterfeiting.


When the port of Odesa reopens, criminal groups will return to the region to re-occupy old markets and exploit new opportunities. Increased efficiency and lower risk could make Danube ports attractive for the smuggling of weapons, chemical precursors and drugs. As part of clean-up and reconstruction efforts, there could be an increased market for smuggling of waste, as well as the removal of scrap metal, which is a potential cover load for illicit goods. As a GI-TOC report observed, 'the heightened importance of the Danube ports in 2022 may serve as proof of concept for organized crime: Reni and Izmail are likely to lose their bumper share of licit trade as and when the port of Odesa finally reopens, but may well retain their new-found importance for illicit flows into the heart of Europe'.<sup>96</sup>

Cynics might say that this is Ukraine's problem. But since the Danube is a river that flows through 10 countries in the heart of Europe, as one organized crime expert pointed out, 'every country on the Danube de facto shares a border with Ukraine'.<sup>97</sup> In other words, any increased security risk along the river should be a shared concern of all bordering states.



# CONCLUSIONS AND RECOMMENDATIONS

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Information based on seizures would suggest that there is little trafficking along the Danube. However, seizures are an unreliable measure of actual trafficking activity because of under-reporting and other biases, and most of the seizures in the past few years have been opportunistic rather than targeted. Some parts of the river, particularly ports in Moldova and Ukraine, appear vulnerable to criminal activity, and the situation could get worse after the war in Ukraine due to an increased risk of arms trafficking. As one Hungarian customs official warned, ‘the same techniques and compartments used to smuggle cigarettes could be used to smuggle other things’.<sup>98</sup> Or as a Serbian security official pointed out, ‘smugglers are often engaged in polycriminal activity; the routes, ships and modalities used today to smuggle fuel could be a dress rehearsal for carrying out more serious types of crime in the future’.<sup>99</sup>

Limited multilateral law enforcement cooperation along the river is a major handicap, and minimal political and operational attention to trafficking on the Danube means that this internal waterway in the heart of Europe is a relatively low-risk artery for traffickers.

It is revealing that the topic of ‘security’ was the last to be added to the EU Danube Strategy, almost as an afterthought. Inland waterways also do not receive much attention in the European Maritime Security Strategy,<sup>100</sup> the EU Strategy to tackle Organized Crime 2021–2025<sup>101</sup> or the EU roadmap to fight drug trafficking and organized crime.<sup>102</sup> But as the most recent action plan of the EU Danube strategy points out, enhancing security along the river – and not just safety of navigation – is a cross-cutting issue that affects cooperation in many other fields, including tourism, energy, the environment, and fostering competitiveness.<sup>103</sup> It is also a key component of enhancing integrated border management.

There is no need to ‘securitize’ the Danube River, nor is that realistic. It is also unwise and unnecessary to divert resources from higher risk hotspots of organized crime such as seaports. Rather, targeted capacity-building, enhanced information gathering and sharing, and increased cooperation – including intelligence-led policing and joint investigative actions – could enhance crime prevention and improve interoperability along the river.

The example of the Danube also underlines how reducing vulnerability to organized crime depends on more than improved law enforcement networks. It is also vital to engage the private sector. In the case of the Danube, key private entities and advocacy groups include Via Donau, Pro Danube, ship owners and port operators. It is also important to involve the ports (for example, through the Danube Ports Network) as well as the affected municipalities and regions. Furthermore, there is a role for civil society, for example, in raising awareness about the environmental impact of organized crime and corruption, as well as the harms of trafficking, not least to affected communities. Most of all, it is vital to have strong political engagement and leadership to generate the necessary attention and resources to foster greater cooperation and implement



commitments, such as those contained in the EUSDR. In that regard, it is advantageous that Austria has the presidency of the EUSDR until the end of 2024 and has made 'contributing to stability and security' one of its main priorities. Furthermore, Hungary will take over the presidency of the Council of the EU in the second half of 2024. These two countries – together with Bavaria and Bulgaria as coordinators of Priority Action 11 (on security) of the EUSDR – could be the motor for pushing forward some of the recommendations made below.

As pointed out in this report, recommendations have been made in the past to enhance law enforcement cooperation among Danube states, but there has been little follow-up. What would be different this time?

A number of currently pressing factors should focus greater political attention on the strategic significance of the Danube: the war in Ukraine and its impact on the region, the renewed importance of the Danube for trans-shipment and related investments in infrastructure, discussions on lifting controls at internal land borders

between Bulgaria and Romania and countries of the Schengen area,<sup>104</sup> and the EU accession processes of Moldova, Ukraine and Serbia. Improving infrastructure and trade without enhancing anti-corruption measures and law enforcement cooperation will create unintended consequences that could increase the risks of organized crime along the Danube. Therefore, now is the time to get out in front of the issue, rather than reacting to it once the risk has increased.

More generally, the experience of the Danube highlights the need for paying greater attention to illicit flows along rivers and fostering greater law enforcement cooperation among bordering states. Inland waterways are often overlooked in the context of 'blue crime',<sup>105</sup> yet they are key arteries for criminal activity. Increased cooperation in the Danube region could work as a model to promote greater focus on analyzing and counteracting illicit activity along major rivers in other parts of the world, such as the Amazon, Congo and Mekong.<sup>106</sup>

## Recommendations

Most of the recommendations provided build on existing proposals or structures and would require minimal resources. More important are leadership, political will and practical coordination at both the policy and operational levels. The steps proposed would enhance the national security of all Danube states, help to implement the EU Strategy for the Danube Region and improve European integrated border management. It is recommended that all those states with an interest in security and cooperation on the Danube should:

- Carry out a thorough organized crime threat assessment of the Danube.
- Establish national coordination centres (police and customs cooperation centres) and enhance trilateral cooperation between Romania, Moldova and Ukraine, as well as Hungary, Croatia and Serbia.
- Create a network/cooperation platform between all such centres along the Danube, or at least a network of national focal points and link it to a political body with access to resources (such as EUSDR Priority Area 11 on security) that would have a rotating chair (like the presidency of the EUSDR). The Danube law

enforcement network could improve contacts and information sharing, ensure common standards and policies, plan and hold annual meetings and operations (such as DARIF), and develop risk assessments (e.g. through a strategic forum). A secretariat could be based at a dedicated Danube Law Enforcement Centre, drawing on existing resources (such as the Mohacs centre or in other Danube countries willing to take the lead). This could be incubated by a Danube group within Europol or the European Multidisciplinary Platform Against Criminal Threats and drawing on the modalities of cooperation outlined in the Police Cooperation Convention for Southeast Europe.

- Explore the possibility of institutionalizing the Danube law enforcement network, modelled on the Maritime Analysis and Operations Centre (Narcotics)<sup>107</sup> to ensure a more integrated law enforcement system along the Danube and carry out targeted operations.
- Make more effective use of intelligence-led policing and back-tracking investigations to identify illicit cigarette production centres and labs for manufacturing

synthetic drugs and other psychoactive substances in the region. This should reduce the source of the illicit trade and strengthen the implementation of tobacco traceability and security features in line with EU and World Health Organization regulations.

- Encourage closer trilateral cooperation between Romania, Moldova and Ukraine, particularly between the ports of Galați, Giurgiulesti, Reni and Izmail to facilitate customs and border control/management in the tri-border area.
- Explore the feasibility of creating a trilateral contact point or even a regional PCCC, for example in Galați, to improve customs and border cooperation in the tri-border area between Romania, Moldova and Ukraine. Build on existing agreements to this effect.
- Replace traffic jams with solidarity lanes along the tri-border region of Romania, Moldova and Ukraine. Reduce corruption by simplifying and speeding up border flows while maintaining effective border and customs controls, for example through an authorized economic operator programme and simplified transit procedures (such as creating authorized consignors and consignees).
- Scale up the Customs Eastern and South-Eastern Land Border Expert Team to cover all countries

along the Danube in order to enhance customs cooperation.

- Encourage implementation of the CEERIS and common use of the IBISweb for all countries along the Danube.
- Engage more closely with the private sector, including ports, to reduce vulnerability to criminal infiltration and corruption. For example, strengthen synergies between Action Area 11 and the Danube Ports Network. Pay closer attention to enablers of illicit activity in the private sector, and create a 'suspicious vessels' database (and forum system to update it).
- Increase technical surveillance of the Danube, drawing on lessons learned from the Integrated System for Observation, Surveillance and Control of the Traffic at the Black Sea.
- Create more specified trainings and training material for law enforcement on inland waterways (Danube and tributaries), searching of barges and intelligence-led policing.
- Increase funding for resources for law enforcement and border management on the river, such as patrol boats and sniffer dogs.

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# GLOBAL INITIATIVE

AGAINST TRANSNATIONAL  
ORGANIZED CRIME

## ABOUT THE GLOBAL INITIATIVE

The Global Initiative Against Transnational Organized Crime is a global network with over 600 Network Experts around the world. The Global Initiative provides a platform to promote greater debate and innovative approaches as the building blocks to an inclusive global strategy against organized crime.

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