

THIRD SECURITY AND DEVELOPMENT DIALOGUE ON ENVIRONMENTAL CRIME

**ADVANCING MULTILATERAL AND
MULTI-STAKEHOLDER RESPONSES**

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The conference benefited from a diversity of participants, and was honoured to have been addressed by His Excellency, Thani Mohamed-Soilihi, Minister Delegate for Francophonie and International Partnerships for France, and a range of senior officials from the French government. The European Union was represented by Maria Rosa Sabbatelli, Head of Unit, Global and Transregional Threats and Challenges, Service for Foreign Policy Instruments, European Commission.

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SUMMARY

This international conference was convened in recognition of environmental crimes as threat multipliers to an increasingly fractured and vulnerable planet. They pose threats to not only the environment, but also public health, security, political stability, the rule of law, human rights, sustainable development, food security, livelihoods, habitats, cultural heritage, and the global economy and integrity of the international financial system. Coalescing a more coherent and effective international response was a daunting, but necessary common objective of the government of France and the GI-TOC, who invited a diverse set of participants in Paris for the third security and development dialogue on environmental crime in Paris in April 2025, with the financial support of the European Union through the ECO-SOLVE project. The event is part of a series aimed at building political will and momentum for a more ambitious global response to environmental crime through the multilateral system.

The dialogue series aims to determine shared priorities for action and to prepare for collective engagement ahead of important multilateral processes taking place in 2025 and 2026, with an agenda focused on ways of prioritizing environmental crimes for urgent and collective action at global, regional and national levels to protect both people and planet. As such, it enables participants to:

- discuss strategies to draw attention to the environmental crimes in upcoming multilateral processes;
- debate ways to advocate for and work towards the adoption of the most ambitious and effective measures (at global, regional and national levels) to deter environmental criminality and end impunity, while ensuring sustainable alternative livelihoods for affected communities and individuals;



- reaffirm the critical role, expertise and contributions of civil society in supporting states in their efforts to prevent, detect, investigate, prosecute and adjudicate environmental crimes, and related corruption and financial crimes; and
- commit to further develop multistakeholder cooperation and partnerships against environmental crimes and support the active participation and engagement of members of civil society in multilateral discussions.

More than 100 participants from across government, civil society, academia, law enforcement and criminal justice gathered, under the Chatham House Rule, to discuss these issues and make recommendations for the international system.

This report reflects the common priority issues identified, and considers what can be done to enhance international action. It highlights the key takeaways from the discussions, and lays out a set of the conclusions and recommendations put forward by speakers. These are packaged to support upcoming multilateral processes, and delegates who attend them.

DESPITE PROGRESS, THE STATUS QUO IS NOT WORKING

Environmental crime poses major challenges to security and socio-economic development, causing lasting ecological damage and exacerbating climate insecurity. Despite progress in some areas, enforcement efforts and global agreements remain inadequate to address this rapidly escalating threat to ecosystems, climate, people, global security and the integrity of the international financial system.

Participants identified some of the reasons why the challenge is now so immense, among them a notable increase in the scope and scale of environmental crime and its connections to other forms of organized crime.

- **Diversity and interlinkages:** The scope and scale of activities, sectors and actors involved in environmental crime is greater than ever. The range and diversity of species and environments targeted, and the variety of trafficking methods (including unprecedented levels of online trafficking, even on the open web) have all expanded inexorably. At the same time, the actors involved in environmental crime are often involved in other criminal ecosystems, facilitated by intermediaries from the spheres of business and politics.
- **Irreversible harms:** Illegal environmental markets cause widespread, irreversible damage. These harms are not limited to the habitats and species involved, or to a few 'charismatic' species that have attracted attention in the past. Rather, they cause permanent damage to wider ecosystems and contribute to the poisoning of water systems. Environmental crimes also exacerbate the climate crisis through the criminal exploitation of scarcity markets and the damage caused to carbon sinks and biodiversity hotspots. They endanger

human health, lives, food security and livelihoods, thereby increasing inequalities and vulnerabilities for affected communities and individuals, as well as for future generations. The financial aspects of these activities put pressure on international financial systems and transparency mechanisms.

- **Pace:** Environmental criminal markets develop and evolve rapidly and beyond the pace of current law enforcement and judicial capacities can handle, necessitating faster and innovative responses to address these issues effectively and highlighting the need for greater engagement, cooperation, involvement with civil society, and greater transparency and accountability.

Throughout the dialogue, organized crime was identified as a major driver of environmental degradation, enabled by corruption, weak institutions and consumer demand. Corruption also plays a role in facilitating environmental crime, often by undermining or hampering effective responses. The particular impact on environmental defenders and Indigenous peoples and local communities, who are often at the forefront of the struggle and disproportionately affected, was also highlighted.

Overall, there is a strong need for better-equipped law enforcement and judicial systems, stronger international coordination, and greater political prioritization of environmental crime, which should also be treated as an intergenerational justice and equity issue. Greater political will is needed to drive this action.

Despite the evolution of responses to environmental crime in recent decades, and clear successes in mobilizing action – for example, to protect ‘charismatic’ species – the current range of policies, legislation, capacity and coordination is not sufficient to address developments in organized environmental crime. Doing ‘more of the same’ or continuing with ‘business as usual’ is not enough now and will certainly not be enough when faced with a more challenging future. It is important that the solutions are concrete, context-sensitive, multilateral, innovative, and inclusive of diverse stakeholders.

CHANGING THE NARRATIVE – AND BROADENING THE FRAME

The lack of an effective set of responses is partly a result of the absence of a clear narrative – both for political prioritization and public recognition of the issue.

In terms of political prioritization, participants noted the confusion and limited awareness among key constituencies. Environment ministries show different levels of engagement across countries, and there is also inconsistency in terms of which departments should be leading action on the issue – foreign ministries often take the lead, but not necessarily in coordination with other essential government sectors. While regional organizations such as the EU have begun

prioritizing environmental crime, this focus is not guaranteed in the long term – especially as other security and development challenges emerge in today’s volatile geopolitical landscape.

Public awareness of environmental crime is notably lower than for broader environmental concerns, including the climate crisis. Addressing this is vital, as only broader societal understanding of the issue can help to underpin political commitment to tackling it.

The dialogue advocated for better linking of environmental crimes to global and regional security and stability, migration flows and current priorities on the global environmental policy agenda (such as climate, biodiversity, water, land degradation and pollution). Participants also emphasized the importance of conveying the impact of these crimes on people (including women and youth), communities and sustainable development, and crucially, on the global economy. Environmental crime needs to be valued not just in terms of the street value of environmental commodities, but also in terms of the long-term damage caused by their illegal extraction from or addition to ecosystems – a cost estimated to be at least US\$1 trillion per year.¹

The case for raising the profile of the issue would be strengthened by the incorporation of all current major forms of environmental crime into the framework for discussion at the multi-lateral level, including:

- wildlife trafficking, with species disappearing, not limited to those that are supposed to be protected under CITES or national legislation;
- illegal logging and timber trafficking;
- illegal fishing, marine species trafficking and other crimes that affect the marine environment;
- illegal mining and trafficking in minerals and precious metals, particularly gold and critical minerals, driving environmental damage; and
- trafficking in waste, chemicals and other pollutants.

Of course, this is not an exhaustive list. Indeed, environmental crime and related illegal markets are evolving and opportunistic, with growing evidence of illegal water abstraction and trafficking by organized criminal groups, the increasing risk of criminal misuse of climate and biodiversity finance, and the high vulnerability of the clean energy transition sectors to criminal exploitation.

Opportunities to shape the debate

Negotiations on policies and frameworks to address the climate crisis are one ‘centre of gravity’ for multilateral activities related to environmental protection. The next Climate COP, and the events leading up to it in Brazil later in 2025, were identified as key opportunities for governments to make relevant commitments to combat environmental crime. At present, the international community is insufficiently aware of the nexus between environmental crime and the triple planetary crisis of climate change, biodiversity loss and pollution. Crucially, speakers underlined the need to focus on addressing the climate, biodiversity and pollution crises in a coordinated manner, in line with the approach taken under the Kunming-Montréal

¹ This estimate covers illegal wildlife trade, illegal logging and illegal fishing only. See World Bank Group, Illegal logging, fishing, and wildlife trade: the costs and how to combat it, October 2019, <https://openknowledge.worldbank.org/entities/publication/1462c00a-6ef5-5964-9805-f31a9b1463ab>.

Global Biodiversity Framework, paying attention to the particular role of environmental crime in all of these crises and noting the steps made at the 2024 UN Biodiversity Conference in Cali, Colombia.

The upcoming intergovernmental expert group on environmental crimes under the UN Convention against Transnational Organized Crime (UNTOC) was also identified as a potential avenue to translating political will into action through the multilateral system, including through discussions on the shape of a potential new protocol to the UNTOC (see below). Despite the different perspectives, this forum represents a clear opportunity for states to drive substantial change on this issue and to strengthen multistakeholder collaboration under the UNTOC more generally. The next UN Crime Congress in Abu Dhabi in 2026 serves as another critical moment to advance political action and attention on environmental crimes, as part of the same multilateral ecosystem as the UNTOC working group.

Participants flagged several other opportunities in 2025:

- The UN Ocean Conference in Nice in June, which may also address crimes that affect the marine environment.
- The IUCN World Conservation Congress in Abu Dhabi in October, which will consider several draft motions on environmental crime.
- The 7th UN Environment Assembly in Nairobi in December, under the theme ‘Advancing sustainable solutions for a resilient planet’, could adopt a new resolution on minerals that may pave the way for negotiations on a new international legal instrument to improve traceability, sustainability and due diligence for minerals.

WHAT IS NOT WORKING

The range of responses that are needed to more effectively address environmental crimes are diverse, and participants came to the meeting with different priorities and concerns. There was nevertheless remarkable consensus that the status quo is not working, with some key concerns identified for the different stakeholder constituencies.

For civil society and Indigenous peoples

Civil society actors – particularly women, youth, Indigenous peoples, journalists, NGOs and investigators working with law enforcement – are at the front line of the fight against environmental crime. Civil society also plays an essential role in supporting law enforcement and holding states accountable to their responsibilities under wildlife trade instruments – a role that is more pronounced in regard to environmental crime than with other forms of crime. This role is enhanced as civil society is frequently trying to fill the gap left by states in addressing environmental crime threats.

Environmental defenders, especially local communities and Indigenous peoples, face substantial risks in trying to protect ecosystems and environmental resources from criminal

exploitation backed by political elites. In this fight, they are often poorly protected, especially when powerful interests are being challenged – as evidenced by the many cases where environmental defenders have been killed despite previously calling attention to threats against them.

Environmental defenders have a comprehensive understanding of the underlying causes of their vulnerability – from poor state and police presence, weak land rights and corruption, to uncontrolled and non-consultative development of remote areas. Effective strategies to combat environmental crime must recognize this knowledge as well as the threats to civil society by incorporating respectful local sustainable development and concrete and effective protection mechanisms – rather than just support mechanisms that are activated when it is too late.

While NGOs have a long track record of working with law enforcement to carry out investigations, and provide evidence and support prosecutions, the challenges they face in doing so should not be underestimated. Although the positive role contributions of civil society in supporting law enforcement are widely recognized, more widespread support for their work is urgently needed.

Given these realities, there is a vital role for people with expertise in this area to provide input into the upcoming processes in the multilateral system where decisions on these issues will be taken. Their contributions will help ensure that the resulting policies and actions are relevant, comprehensive, adapted to the realities on the ground, impactful and implemented effectively at all levels.

For states

Countries with substantial environmental resources – often in the Global South – are increasingly struggling with various forms of criminal predation. This criminality frequently infiltrates the public sector, through corruption and regulatory capture, weakening governance structures and diverting resources from essential public services. This leaves these countries simultaneously tackling environmental degradation and organized crime alongside other development challenges, including governance failures.

Participants noted that people in the Global South are disproportionately impacted by the adverse effects of environmental crimes. This is especially true for small island states, where marine-related crimes such as illegal fishing and ocean pollution directly threaten livelihoods and food security. Similarly, crimes that affect carbon sinks (such as illegal logging and pollution) intensify worse the effects of climate change on vulnerable communities. For these states and their citizens, countering environmental crime is therefore a matter of survival.

These states consider environmental crime a priority security and development. Yet this level of prioritization is not matched by the current range of international responses, which primarily expect countries to strengthen their domestic legislation without adequate harmonization or cooperation. Furthermore, affected nations often lack automatic access to the necessary resources required to fulfill their obligations. In critical sectors such as forestry, fish, mineral and water extraction, and chemical management, there are no universal legal instruments that could provide a basis for harmonized domestic criminalization of environmental crimes. This regulatory vacuum leaves countries feeling isolated and powerless against sophisticated transnational criminal networks.

This explains why the idea of establishing a new protocol or protocols to the UNTOC appeals to certain countries. The proposed benefits of a new protocol included offering a uniform set of minimum rules and standards for criminalization worldwide, which would theoretically eliminate safe havens for criminals targeting the environment. Additionally, a dedicated environmental crime protocol would promote comprehensive investigations – including financial ones – while enhancing coordination in investigation, prosecution and the application of other UNTOC tools, including protection mechanisms for victims and witnesses.

These institutional gaps have also led states to call for specific instruments to support their responses and facilitate more effective international cooperation. The establishment of a special commission on public security under the Amazon Cooperation Treaty Organization (ACTO), following a summit in Belém in 2023, was also welcomed as an important regional development. Similarly, at the 2024 Convention on Biological Diversity COP16 in Cali, Colombia, a new treaty addressing the traceability and sustainability in mineral supply chains was proposed. This initiative aims to address the severe criminal crisis affecting gold-producing forests regions around the world, anticipate the growing demand for critical minerals in the context of clean energy transitions, and address existing vulnerabilities in this sector.

Afflicted states have invested in legislative, technological and political measures to address environmental crimes. One country representative outlined a best practice example of combining different legal frameworks – such as forestry, environmental, mining and anti-corruption laws – to ensure a more comprehensive toolkit for enforcement and justice. They have also leveraged technology to improve inter-institutional coordination and cooperation, while establishing clear, measurable environmental restoration goals. These integrated approaches are needed in more jurisdictions to address the vast imbalance in which certain regions bear the burden of response.

Despite the major legislation developments in some countries, implementation remains a problem globally. While capacity constraints impede progress in the Global South, a different challenge exists in the Global North, where environmental crime legislation that threatens private sector or political interests is often deliberately weakened or inadequately enforced. This creates a clear accountability gap in implementation, even in regions with the most advanced legislation and international cooperation regimes.

THE ROLE OF MULTILATERAL AGENCIES AND REGIONAL ORGANIZATIONS

Multilateral collaboration, particularly through institutions such as the EU, UNODC and INTERPOL, was deemed essential for addressing transnational environmental crime. However, speakers emphasized that existing international cooperation regimes face substantial challenges. The UNTOC in particular was identified as suffering major implementation gaps; despite extensive awareness-raising and training efforts, practitioners underutilized it as a tool for international cooperation, mutual legal assistance or even information sharing.

Speakers noted that multilateral system has tended to address environmental crimes in siloes, as reflected in the approach taken through the various multilateral environmental agreements and other instruments – or in disconnected and disparate ways. They emphasized the urgent need to move towards more integrated and accountable responses.

THE VALUE AND LIMITS OF A NEW UNTOC PROTOCOL

Conference participants expressed diverse perspectives on the need for a new protocol, or protocols, to the UNTOC (or even a new standalone instrument). They also held differing views regarding what a new protocol should look like, how it should be monitored, and even what its added value could or should be. Nonetheless, participants recognized that while a new protocol would not serve as a panacea but would rather form part of a broader toolbox. This requires governments and other stakeholders to seriously consider their positions and bring concrete proposals to upcoming discussions on the matter.

The discussion examined the perceived trade-offs between trying to strengthen the enforcement of existing frameworks versus improving the frameworks themselves. Many countries struggle with weak law enforcement and judicial institutions, limiting their ability to effectively combat any form of organized crime. Law enforcement personnel dedicated to fighting environmental crime are often seized with the urgency and difficulty of their work, for which many feel they already have the right legal tools, but lack the resources, specialized training or political support to make best use of them. In this context, some view new international negotiations as a distraction. While meeting participants agreed that negotiations on a new protocol should not take priority over operational capacity development, some felt that this was not a false dichotomy, especially as raising the profile of environmental crime internationally could help raise political attention and prioritization in both immediately and in the long term, and thereby drawing more resources to this critical area.

A new protocol could address low awareness of the UNTOC and insufficient political will to address environmental crimes more effectively (and to use the UNTOC in doing so), and potentially direct resources towards enforcement and cooperation. More specifically, a new protocol would tackle the evident gaps and patchwork in legislation identified most notably by the UNODC's own analysis on the topic.²

Harmonized legislation, if done well, would create favourable conditions for enhanced international cooperation. Participants emphasized that a new protocol to the UNTOC should enable parties to access the convention's international cooperation mechanisms, despite their current

2 UNODC, New UNODC analysis highlights complex 'patchwork' of environmental protection laws globally, offers recommendations to prevent criminal exploitation, 17 May 2024, <https://www.unodc.org/unodc/en/press/releases/2024/May/new-unodc-analysis-highlights-complex-patchwork-of-environmental-protection-laws-globally--offers-recommendations-to-prevent-criminal-exploitation.html>.

underutilization. The electronic evidence exchange mechanisms established under the new UN Convention on Cybercrime were also highlighted as valuable tools that could be replicated through a new protocol.

However, organized crime is widely regarded as having outpaced the implementation of the UNTOC, despite the convention's comprehensive provisions and built-in flexibility. To address environmental crime more effectively using the UNTOC, a new protocol would need to include a list of offences while establishing a way to address crimes that resist easy definition.

A new protocol to the UNTOC was also discussed as a way to address several critical needs:

- The lack of sustainable funding for capacity building, interagency coordination and research, not limited to specific UN agencies or types of environmental crime.
- Enhancing criminalization and closing legal gaps (including for legal persons) while incorporating measures to improve transparency and integrity in criminal justice responses that target the key enablers of these crimes – such as corruption, private sector malpractice and negligence – and ensure effective law enforcement throughout the entire supply chain.
- Fostering multi-stakeholder partnerships – including with civil society, academia and the private sector – currently insufficiently recognized by existing mechanisms.
- Strengthening the role of civil society, particularly in the design and implementation of prevention strategies – including education, training of law enforcement and judicial personnel, demand reduction, and alternative livelihoods measures – and connecting reliable law enforcement actors in different countries with each other and with key actors in international organizations and civil society, and supporting information sharing, data collection and capacity-building initiatives.

Participants reflected on the importance of learning from implementation of the UNTOC and other international instruments to avoid repeating mistakes that have permitted ineffective and flawed implementation processes. They made a compelling case for the need to ensure that a new UNTOC protocol, or similar international agreement, includes a strong accountability system that will:

- ensure transparency (enabling states, civil society organizations, academia and the media to monitor performance and identify gaps in implementation);
- provide an oversight mechanism (through an independent or peer review process to help ensure objectivity, reduce self-reporting bias, and build trust in reported progress);
- include a complaint mechanism (allowing states, civil society organizations and other stakeholders to raise concerns about non-compliance); and
- ensure enforcement (with dissuasive consequences for non-compliance).

Overall, participants recognized that existing UNTOC implementation and review systems, as well as international environmental law and related compliance mechanisms, are not doing enough to ensure an effective global response to environmental crime (both to prevent it and end its impunity). The international community needs new approaches to improve the implementation of the UNTOC on environmental crimes – approaches that build on existing international and regional legal instruments and other tools while incorporating critical evaluation and scrutiny.³

³ Existing international and regional legal instruments could include multilateral environmental agreements and other conventions and protocols, the UN Convention against Corruption (UNCAC), UNTOC protocols and the EU directive on environmental crime. Other tools could include UNODC legislative guides, and Financial Action Task Force and Organisation for Economic Co-operation and Development standards.

RATIONALIZING EFFORTS ACROSS THE MULTILATERAL SYSTEM

Multilateral activity has tended to operate in silos – fragmented across different sectors and processes. In this context, important international agreements and treaties exist covering various issues that need to be assessed to avoid duplication and to extract valuable lessons. For fisheries crime in particular, a substantial challenge lies in the under-enforcement of existing laws – including those addressing interconnected serious crime types such as human trafficking and money laundering.

Speakers encouraged governments to enhance synergies between multilateral environmental agreements, other relevant international and regional legal instruments,⁴ and the UNTOC to close the gaps between environmental governance, trade and criminal law approaches. They also urged that synergies be created between these regimes and human rights instruments⁵ to facilitate access to environmental justice and ensure corporate transparency, due diligence and accountability.

Currently, there is a lack of standardized definitions and data, including on how to use the UNTOC to address corporate crime as organized crime.

The negotiations of the new EU directive 2024/1203 on the protection of environment through criminal law also provided useful lessons. The directive is intended to approach environmental crime in a holistic and dynamic way, taking into account its impacts on human health and lives alongside environmental damage, while addressing the need for criminal law instruments to be evolve continuously in response to constantly shifting illegal markets and criminal strategies.

Lessons from its implementation include the need to invest in measures and resources that ensure effective implementation on the ground, encompassing specialized training for enforcement officials and emphasizing the importance of data collection for intelligence and trend analysis. Speakers underlined the importance of beginning negotiations for new instruments with the highest possible level of ambition, recognizing that initial ambitions typically narrow throughout the negotiation process.

References were made to Opinion No.17 (2022) of the Consultative Council of European Prosecutors on the role of prosecutors in the protection of the environment, as well as the new Council of Europe convention on the protection of the environment through criminal law, both of which could also serve as sources of inspiration for how the international community might comprehensively approach crimes that affect the environment within a single

4 Including the United Nations Convention on the Law of the Sea (UNCLOS), the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ treaty), and instruments adopted under Food and Agriculture Organization (FAO) and the International Maritime Organization (IMO).

5 Such as the Escazú Agreement, International Labour Organization (ILO) instruments and the UN Guiding Principles on Business and Human Rights.

additional protocol to the UNTOC. Ultimately, participants identified the need for technical capacity-building to effectively implement all of these agreements – whether focusing on enforcement, judicial processes or international cooperation.

CORRUPTION AS A KEY ENABLER

Progress in tackling environmental crime depends on addressing the role of corruption as a critical enabler and a force that undermines legal and environmental protections. The discussion highlighted corruption's multifaceted nature, which extends beyond political protection emboldening criminal actors to break the law. Corruption permeates environmental agencies, law enforcement and judicial institutions, creating systemic barriers to effective intervention.

Corruption is also frequently a force behind the criminal persecution of environmental defenders. Speakers emphasized the need to protect environmental defenders and civil society, not only for their own safety, but also to enable them to fulfil their vital role in exposing corruption and fighting environmental crime.

Financial investigations were identified as an essential strategy in confronting environmental crime, and should systemically be conducted every time an environmental offence is investigated. This will ensure a fair and effective judicial response in which the real organizers and beneficiaries of the crime are targeted, instead of just low-level criminal actors.

Countries with major financial centres need to do more to contribute to cross-border cooperation, including assessing the revenue lost through crime. By more effectively tracking and disrupting illicit financial flows, these countries can also play a role in helping convict environmental criminals. Criminal asset confiscation is another possible approach, particularly when recovered revenue can be redirected back to affected communities, and is useful for mobilizing both political actors and the public.

THE COMPLEX QUESTION OF THE PRIVATE SECTOR

The different ways in which the private sector is involved in both environmental crime and the fight against it recurred throughout the dialogue. The discussions spanned the lack of effective tools to hold 'legal persons' accountable when companies cause serious environmental damage, and the necessity of engaging the private sector to address its role in protecting value chains from criminal infiltration while ensuring that it does not facilitate environmental crime.

In this regard, international legal frameworks could provide better guidance on criminalizing legal persons, while international processes could do more to include the input and perspectives of private sector actors regarding corporate responsibility to crime-proof economic infrastructure.

This discussion also touched on another strategic consideration: the importance of engaging (whether collaboratively or through, legislation, incentives and sanctions) the private sector in efforts to address money laundering and criminalized supply chains.

Speakers acknowledged the private sector's growing awareness of environmental crime risks alongside the challenges companies face in identifying risks and vulnerability points throughout their value chains. They urged the integration of businesses into vigilance efforts, especially in sectors with substantial transnational criminal markets that are difficult for law enforcement officers to uncover and investigate, such as trade in minerals, precious metals and waste.

Experience in promoting corporate transparency and due diligence has revealed the difficulty of imposing a results-based obligation on companies due to the complexity involved. Nevertheless, obligations related to means, reporting and controls were deemed necessary to provide proper incentives to economic actors and prevent them from circumventing regulations and shirking their responsibilities.

Speakers raised the value of including environmental crimes in countries' national risk assessments under anti money laundering regimes and enhancing the role of financial intelligence units (FIUs) in identifying major criminals, disrupting illicit networks and recovering proceeds of environmental crimes. This 'follow the money' approach aims to target criminals where it hurts most: by eliminating the financial incentive to commit these crimes and brining the heads of criminal networks to justice. Significant progress has been made in the financial sector recently, including through the obligation under the Financial Action Task Force for countries to criminalize environmental crime as a predicate offence in their national money laundering risk assessments. Regulations must now be extended to non-financial sectors.

DATA AND TECHNOLOGY

New data, expert input, innovation and evidence of effectiveness are crucial ingredients for both designing new environmental crime instruments and selling them to key constituencies. More robust and comprehensive data on environmental crime and responses to it would reinforce the importance of the issue, highlighting what can be achieved through international cooperation and providing compelling evidence for action.

Technological innovations offer promising tools for making the response more innovative and adaptive, including by using artificial intelligence for gathering information and tracking illicit financial flows. However, challenges remain in aggregating and utilizing existing data, both at domestic and international levels, with institutional barriers and data protection legislation impeding the process.

WIDENING THE CONVERSATION

A challenge to addressing environmental crime is the limited engagement of certain states and the private sector. While committed nations show significant interest, there is a clear need to expand the conversation and involve countries currently on the periphery of discussions, especially since multilateral processes to make progress on the issue are already underway.

The UN system itself has an uneven approach to environmental crime, with multilateral responses in Vienna focused on the criminal justice side, and surprisingly limited engagement from broader environmental and other processes. This fragmentation underscores the need for a more holistic, integrated strategy.

The meeting concluded with a call for greater collaboration, improved data collection, effective protection of civil society under threat and sustained political commitment to combat environmental crime. Tackling corruption and building political will were identified as the two cornerstones of meaningful progress in combating environmental crime. The path forward demands not just isolated interventions, but an interconnected approach that addresses the complex ecosystem of environmental criminality.



CONCLUSIONS AND RECOMMENDATIONS

This third dialogue has produced a set of common conclusions and recommendations that aims to guide policymakers in addressing environmental crime more effectively through innovative and inclusive solutions.

1. Support strategic leadership through a clearer narrative

The meeting demonstrated a firm commitment to raising the profile of environmental crimes as an international priority for action, and to encourage as many countries and stakeholders as possible to increase their ambition across various UN and other multilateral agendas. The narrative used to achieve this is crucial, and should focus on:

- Understanding environmental crime as one of the most widespread and damaging forms of organized crime, urgently requiring a strong, impactful and well-coordinated global response.
- Identifying it as a priority for action in a time of widespread geopolitical upheaval and increasing risk on many fronts.
- Bringing different strategic constituencies on board to support ambitious and sustained change, through the widespread mobilization of political figures and leadership in key countries.

The first step towards building momentum should be to form a diverse, multistakeholder community committed to taking action to improve the effectiveness of international cooperation in preventing and combating environmental crime. The second step should be to generate much wider participation in this campaign.

2. Close the gaps in existing frameworks

Existing multilateral responses to environmental crime are inconsistent and inadequate. Current frameworks have clear legislative and implementation gaps, which create vulnerabilities that criminal groups can exploit.

The potential addition of a new UNTOC protocol on environmental crime emerged as the focal point in discussions on addressing these systemic weaknesses, with the debate centring on whether a protocol is the correct priority.

Areas of disagreement highlighted the importance that a new protocol address issues around the resources required for law enforcement and criminal justice responses, as well as the track record of implementing existing international agreements. The UNTOC and its existing protocols already face serious implementation challenges, which must inform future approaches. Participants emphasized the need to increase synergies between multilateral environmental

agreements and other relevant international legal instruments and UN conventions,⁶ and to expand and diversify data and analysis regarding the implementation and impacts of legislation and enforcement efforts.

Participants identified the following recommendations for a potential new protocol or instruments addressing environmental crime:

- Recognize that preventing and combating environmental crime is a shared concern and responsibility.
- Harmonize domestic laws and close legal gaps, as legal frameworks are the basis of all law enforcement interventions and judicial proceedings. Central to this effort will be establishing clear definitions and criminalization standards for environmental crimes, while also addressing related offences that present definitional challenges.
- Adopt a broad scope that encompasses the diverse threats faced globally, rather than separately targeting specific crimes that may only affect particular regions and local economies. An inclusive approach offers the advantage of being able to better anticipate and adapt to changes in environmental crime trends and related illegal markets over time.
- Aim to enhance international cooperation, including cross-border investigations and judicial cooperation. The new protocol will therefore need to address the fact that awareness and usage of the UNTOC is low despite its near-universal ratification status, particularly in key illicit markets.
- Mobilize resources for law enforcement and criminal justice systems, ensuring effective remediation of environmental damage and compensation for victims.

Ultimately, a new protocol should build on and complement existing international and regional instruments, but not aim to replace them. Done well, a new protocol would provide a rallying point for increasing attention and action, through better capacity and connections. The effectiveness of the protocol will depend on:

- the robustness and completeness of its provisions to ensure a comprehensive response to the complex and multifaceted problem of environmental crime that is commensurate with the seriousness of its impacts and its links to other crimes;
- its swift and wide ratification and meaningful implementation and review;
- domestic strategies designed to ensure its effective implementation, necessitating whole-of-government and whole-of-society approaches;
- its enforcement, which will need to be monitored by the international community and civil society (the existing UNTOC review mechanism is not appropriate and must be avoided and adapted for the protocol to have impact); and
- its ability to evolve over time as may be necessary to remain relevant.

3. Equip law enforcement, judicial authorities and civil society

Broadly, the meeting recognized the innovations occurring in the law enforcement space, and participants expressed appreciation for colleagues working in this field. Law enforcement and

⁶ Including the UNTOC and UNCAC.

judicial authorities often lack sufficient resources, specialization and prioritization, particularly in developing countries. In many parts of the world, civil society also plays an important role in catalyzing law enforcement activity in relation to environmental crimes, preventing environmental crimes from being committed, combating their root causes and enablers, and holding governments to account.

Participants agreed on several recommendations to strengthen law enforcement capacity and effectiveness under a new protocol:

- For a protocol to benefit enforcement, adequate resources, equipment and specialization must be in place to enable law enforcement and judicial actors to implement laws against environmental crime and use the tools for international cooperation available under this protocol, other UNTOC additional protocols, and the UNCAC.
- Environmental crimes need to be addressed from a broader development perspective. This means targeting the root causes and enablers (including market demand, absence of alternative sustainable livelihoods, and corruption) to enhance prevention. It also means paying attention to the functioning of law enforcement and criminal justice sectors in their entirety, while supporting environmental protection agencies, inspectors and guards, with civil society and local communities serving as essential partners.
- Guidelines should be developed and promoted for best practices in interactions between civil society and law enforcement interaction, alongside a global repository of best practices to support the effective implementation of the new protocol and existing instruments.

4. Elevate and mainstream the fight against corruption, and follow the money

Corruption sits at the heart of the challenges involved in combating environmental crime. Although corruption related to environmental crime has been addressed in resolutions adopted by Conferences of Parties to the UNTOC and UNCAC, as well as by the UN General Assembly, more needs to be done through the multilateral system to implement these agreements and advance the fight.

The meeting acknowledged that progress could also be made by:

- mobilizing pressure from ‘peers’ alongside the more formal multilateral systems while protecting whistle-blowers and others who take risks in reporting crimes;
- enhancing transparency and integrity measures to prevent conflicts of interests and assessing and mitigating corruption risks in both the public and private sectors, as well as across the entire value chain of environmental commodities and products whose sourcing might lead to criminal environmental damage.
- supporting civil society, particularly advocacy organizations and the media, in holding governments accountable; and
- strengthening financial regulations and investigations.

5. Address human rights and alternative development

The multilateral system currently lacks a coherent and consolidated approach to preventing environmental crime, and further work is needed to link this agenda with mechanisms related

to human rights and sustainable development. Although this issue was not discussed in-depth during the meeting, several related discussions emphasized that the international community must:

- Investigate the harms caused by environmental crime to human rights (including the right to a clean, healthy and sustainable environment) and leverage human rights frameworks to advance multilateral efforts on environmental crime, including mechanisms to protect and support environmental defenders, witnesses and victims.
- Acknowledge and protect the land rights of Indigenous peoples as a crime prevention measure, recognizing that land rights violations are often an essential first step in many environmental crimes.
- Promote sustainable alternative forms of socio-economic development that increase the incentives for environmental protection while reducing incentives for the criminal exploitation of natural resources, including by supporting the development of alternative livelihoods.
- Address both supply and demand driving illegal markets, which will continue to expand with population growth, economic development, climate change and the clean energy transition.
- Promote preventive measures along entire value chains, from extraction to supply, including corporate accountability and due diligence measures and systems that would assist law enforcement authorities in their investigations.
- Develop effective regulations for both financial and non-financial sectors, with effective and dissuasive sanctions for non-compliant businesses, while enhancing cooperation with businesses that follow the rules and suffer from unfair competition as a result.

6. Promote inclusivity and build political momentum

A comprehensive approach is needed that mobilizes all actors, including civil society and the private sector. NGOs, researchers, Indigenous peoples and local communities, activists, journalists and media workers are on the front lines, playing crucial roles in preventing and combat environmental crime – often at great personal risk – and thus hold rare expertise on environment crime. Similarly, private sector engagement is vital. In different ways, both groups are sidelined in multilateral discussions and more work must be done to include them.

It is also essential that we reach people who were not privy to this particular discussion or who do not yet have the institutional support to engage with the topic of environmental crime. This can only be achieved through concerted political momentum. To advance this agenda, it is therefore necessary to:

- recruit new advocates in governments, business communities, and even in scientific and environmental policy spheres; and
- disseminate the messages and recommendations from this meeting to multilateral and multistakeholder forums that have not yet addressed environmental crime, have not yet explored it in depth, or have not yet approached environmental problems from a crime perspective, while raising awareness and mobilizing support for a stronger and more integrated response.

