



INTERPOL

ENVIRONMENTAL SECURITY PROGRAMME

Strengthening Law Enforcement
Cooperation Against Pollution Crime

January 2022



EXECUTIVE SUMMARY

This document provides an overview of INTERPOL's work in the fight against pollution crime, including operational, tactical and analytical activities delivered worldwide in support of our 195 member countries and in coordination with strategic partners.

All over the world, criminals traffic and manage waste, chemicals and other hazardous contaminants illegally, in order to gain illegal profits and cut costs associated with their environmentally sound management. Such "pollution crime" has grave consequences for the environment, often resulting in the contamination of land, water sources and the air. The damage caused in turn jeopardizes public health, safety, and food and water security.

Transnational criminal networks often exploit global and regional inequalities in labour costs, environmental regulations and law enforcement capacities to generate high gains by committing pollution offences. Their actions therefore particularly impact vulnerable communities, and threaten legitimate businesses and sustainable development.

At the same time, sanctions are often not commensurate with the proceeds of these crimes and the damage caused. As with other types of environmental crime, pollution crime is driven by a high-reward, low-risk business model.

Pollution offences have also shown evidence of the involvement organized crime, and are often committed together with other crimes to conceal or facilitate the pollution offence, particularly financial crime and document frauds, corruption, other environmental crimes, and various forms of illicit trafficking.

Ten years ago, INTERPOL's Environmental Security Programme (ENS) was formed to prevent and disrupt environmental crime and connected crimes, including pollution crime, by enhancing international cooperation and innovation on related police and security matters. ENS has, in particular, been providing operational, analytical, investigative and capacity

building support to member countries in order to advance key transnational investigations into pollution offences, promoting an intelligence-based approach.

Key outcomes include the disruption of transnational criminal networks in the waste sector and the arrests of hundreds of criminals committing pollution crime at sea and on land. By collecting operational data from all over the world, INTERPOL has also identified criminal patterns and *modi operandi* characterizing pollution crime, supporting the enforcement work in member countries.

The continuous increase in the number of inspections carried out, and of pollution offences reported to INTERPOL in the recent years, have shown that the engagement of police forces and authorities to fight pollution crime has risen significantly and globally in the recent years, not only as serious organized crime but also as a threat to the rule of law, global economies and sustainable development.

Since 2020, ENS has addressed this crime area with a programmatic approach. ENS assists member countries in raising awareness of abuses of regulations and enhances their investigative and analytical capabilities leading to decisive enforcement action.

The INTERPOL Pollution Crime Working Group (PCWG) provides an international platform for additional cooperation between member countries. Under the guidance of its board, the PCWG organizes annual meetings for operational-level representatives from relevant authorities.

This cross-sector approach is strengthened by collaboration with intergovernmental and non-governmental organizations, academia and the public and private sectors, which are encouraged to enter into dialogue with national enforcement authorities and combine their efforts to tackle transnational pollution crime.

THE ISSUES

INTERPOL uses “Pollution Crime” as an umbrella term to describe a range of criminal activities involving the trafficking and/or the illegal management of potential contaminants. Its primary impact is environmental pollution, through the unauthorized discharge, disposal, and/or emission of contaminants onto the land, and into water or the atmosphere.

By harming the environment, pollution crime negatively impacts public health, safety, and food and water security. Pollution-causing contaminants include waste; chemicals such as ozone-depleting substances, pesticides and mercury; oil and gas; and even some compounds such as carbon and sulphur.

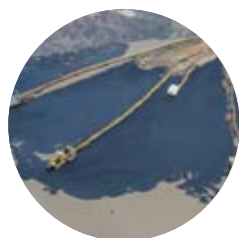
KEY FACTS ON THE MOST COMMON TYPES OF POLLUTION CRIME

WASTE CRIME



- Business concerned** The waste sector is a rapidly growing business, estimated at USD 410 billion annually.
- Illegal activities** Illegal waste treatment (discharges, disposal, incineration or recycling) and waste trafficking across borders.
- Commodities** All types of waste, in particular hazardous and recycling waste presenting better opportunities for illegal profit.
- Trafficking Routes** Predominantly from high-income countries (where waste production is abundant and waste management costs are high) to low-income countries (where costs are lower, but waste recycling and treatment capacities are limited).

MARINE POLLUTION CRIME



- Business concerned** The “ocean economy” is estimated to amount to USD 1.5 trillion annually.
- Illegal activities** Illegal pollution at sea (discharges from vessels and offshore installations, oil spills, illegal emissions, shipbreaking), illegal pollution of inland waters (discharges into rivers of sewage and toxic effluents from mining activities), illegal coastal pollution (illegal dumping, constructions, plastic use and sand harvesting in coastal areas), and waste trafficking through ports.

ILLEGAL USE OF PLASTIC



- Business concerned** The global plastics market was valued at USD 579.7 billion in 2020 and expands rapidly, at an estimated rate of 3.4% from 2021 to 2028.
- Illegal activities** Violation of legal limits on single-use plastics and microplastics being implemented worldwide. As of July 2018, 127 countries had adopted some form of legislation to regulate plastic bags.

ILLEGAL USE AND TRADE OF CHEMICALS



- Business concerned** A USD 4.1 trillion market involving tens of thousands of compounds employed in a wide range of sectors from agriculture, clothing and pharmacy to transportation and technology.
- Illegal activities** Use of chemicals beyond their legal limits; use, sale and smuggling in banned and counterfeit chemicals.
- Commodities** All types of chemicals, particularly pesticides, mercury (used in gold mining), consumer products containing persistent organic pollutants (POPs) such as heavy metals, Ozone-Depleting Substances (ODS) such as cooling gas.
- Trafficking Routes** Cross-border trafficking, often to phase out stocks from countries where they have been banned to countries with developing legislations in this area. Chemicals can also illegally enter the market as part of a large variety of consumer products.

FOSSIL FUEL-RELATED CRIME



- Business concerned** The oil and gas industry is the most profitable industry in the world, amounting to USD 3.3 trillion in 2019. Fuel is the most smuggled natural resource in the world.
- Illegal activities** Oil theft (outright stealing and smuggling across countries through ports or by transfer at high sea), fuel misdeclaration (evading import tax by declaring fuel at a lower value (e.g. a lower fuel grade or lower volume), illegal refineries (processing crude oil that is sub-standard or stolen), and illegal oil blending (mixing gasoline with other substances to increase the fuel volume and maximise profits).
- Commodities** Charcoal, gas, oil and other fuels.

CARBON TRADING CRIME



- Business concerned** A rapidly growing USD 214.5 billion market (a 34 per cent market value growth in 2019). Emissions trading schemes are emerging market instruments at the national and regional levels, setting emissions obligations under “cap-and-trade” schemes, in an effort to mitigate climate change.
- Illegal activities** Fraudulent emission measurements to claim more carbon credits than were actually obtained; sale of carbon credits that either do not exist or belong to someone else; exploitation of weak regulations in the carbon market to commit financial crimes, such as money laundering, securities fraud or tax fraud; and computer hacking/phishing to steal carbon credits and personal information.
- Commodities** Carbon credit (corresponding to the emission equivalent of the greenhouse power of one ton of carbon dioxide) to emit within the agreed thresholds.

THE CONSEQUENCES

While the different types of pollution crime have some distinctive consequences, they all pose a series of common threats to the environment, public safety, economic security and public health:

Direct impact of pollution crime



Environmental damage



Safety hazard

2nd degree impact of pollution crime: A threat to environmental security



Food insecurity



Water insecurity



Air pollution

3rd degree of impact of pollution crime: A threat to communities



Public health hazard



Economic loss and impediment to sustainable development



Reduced quality of life

INTERPOL APPROACH

INTERPOL operates globally and acts as a neutral platform for the global exchange of law enforcement information, allowing ENS to identify, deter and disrupt criminal networks behind pollution crime and associated crimes.

INTERPOL's Environmental Security Programme supports member countries in eliminating criminal polluters through a four-step cyclic approach revolving around operational activities:



KEY FACTS ON THE CONSEQUENCES OF POLLUTION CRIME

- ▶ Although the use of illegal chemicals exposes all sectors of society to health hazards due to their toxicity, rural populations and manual workers in developing countries are particularly vulnerable to the risks of acute and chronic disease, and sometimes lethal poisoning caused by the use of illicit pesticides.
- ▶ Fuel smuggling results in the loss of USD 40 billion in tax revenue every year and the illicit trade in refined fuels is estimated to value USD 100 billion.
- ▶ The value of illegally traded mercury is estimated in the range of USD 100-215 million annually.



POLLUTION CRIME INTENSIFIES PLASTIC POLLUTION

With eight million metric tons of plastic waste entering our oceans every year, plastic pollution is a major global challenge and a profitable criminal business. Plastic debris generated by illegal activities can persist in the marine environment for hundreds of years, entangle and suffocate animals, and eventually photodegrade into microplastics which enter and negatively affect the food chain.

INTERPOL analysis has revealed that plastic waste crime has risen at an alarming rate since 2018. In export countries, difficulties in managing the waste surplus has translated into a surge in illegal waste disposal and fires. Illegal plastic waste imports are also affecting a growing number of emerging destination countries in South and Southeast Asia, where illegal waste dumping and illegal recycling businesses are on the rise. In addition, as more countries introduce restrictions to limit the production of single-use plastics, businesses trafficking illegal plastic items are also emerging.

CONNECTED CRIMES

Pollution crimes are often committed together with other serious crimes used to conceal or facilitate the pollution offence. For instance, tax evasion is often part of waste offences themselves, which in turn fuels money laundering as a way to divert illicit profits into legitimate businesses and properties; and the trade in illegal pesticides is often associated with illicit drug cultivation.



ORGANIZED CRIME IN POLLUTION CRIME

While a large part of pollution crime is corporate crime, it also attracts organized crime, with all types of criminal enterprises getting involved in pollution offences: from traditional organized crime groups (such as Mafia/cartels) with a criminal history involving trafficking in other illicit goods, to flexible criminal networks of brokers working together opportunistically along different stages of the criminal supply chain.

It has been estimated that 25 per cent of the profit made by a major Italian Mafia group (USD 26 billion) was a result of environmental crime, and waste crime in particular.

INTERPOL POLICING CAPABILITIES

SECURE COMMUNICATION FOR INTERNATIONAL POLICE COOPERATION

Facilitating communication and information exchange among its 195 member countries is at the core of INTERPOL's work, using key communication tools:

- ▶ **INTERPOL secure channel I-24/7** is the only global messaging system allowing for real-time police information exchange among 195 member countries and for access to 17 global police databases.
- ▶ **Operational and expertise networks** are established by the INTERPOL General Secretariat, through the National Central Bureaus, to facilitate operational coordination and expertise sharing in specific enforcement areas: to coordinate global marine pollution enforcement operations, INTERPOL has established a network of over 200 national specialized enforcement officers.
- ▶ **INTERPOL Notices and Diffusions** are key tools for circulating critical police information about wanted criminals (Red Notices), emerging *modi operandi* (Purple Notices) or imminent threats (Orange Notices): INTERPOL has issued 29 Red Notices for wanted pollution criminals over the last 10 years.

CAPACITY BUILDING AND TRAINING

INTERPOL delivers capacity building and training support to national law enforcement agencies in order to enhance specialized capacities to tackle pollution crime:

- ▶ **Investigative manuals** have been developed to support countries' investigations of pollution offences.
- ▶ **Capacity building meetings** include training designed to meet countries' needs to develop specialized investigative skills, and operational planning meetings designed to enhance countries' capacity to set up effective pollution enforcement operations.

INTERPOL, in cooperation with the PCWG, has supported about officers globally to build their expertise in conducting criminal investigations into pollution from vessels, and planning effective pollution enforcement operations on land and at sea.

In order to support development objectives, countries and territories eligible to receive official development assistance (OECD classification) are prioritized recipients of INTERPOL pollution enforcement training programmes. INTERPOL also encourages gender balance in such activities by prioritizing financial support to countries that nominate an equal number of female and male participants in INTERPOL pollution enforcement meetings.

INTERNATIONALLY COORDINATED OPERATIONS

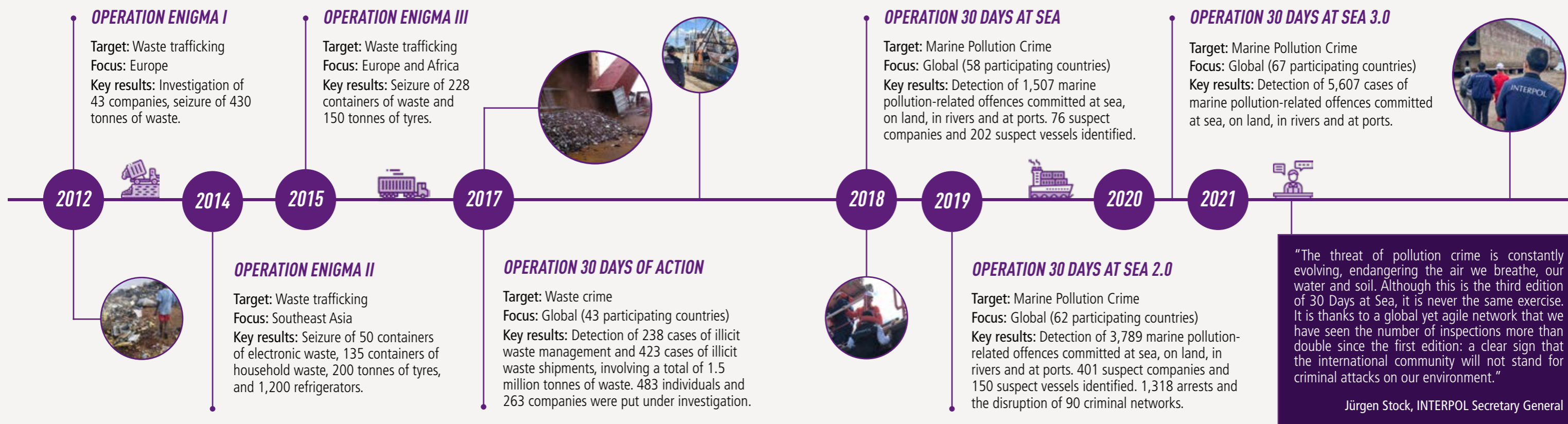
INTERPOL-coordinated regional, multi-regional, or global enforcement operations are an opportunity to:

- ▶ **Gather the law enforcement community** to tackle the same criminal target in a coordinated manner.
- ▶ Foster **multi-agency and international cooperation**, for greater operational effectiveness and resource efficiency.
- ▶ **Collect operational data** to fill INTERPOL databases and advance criminal and strategic analysis.

ANALYTICAL AND INVESTIGATIVE SUPPORT

Analytical and investigative support are delivered in the framework of an operation or in relation to a specific case upon a country's request, through three key INTERPOL policing capabilities:

- ▶ **Analytical Reports** (operational or strategic) are produced to support countries' investigations and/or intelligence-led operational planning, by identifying criminal networks, trafficking routes, mode operandi and risk indicators, and by providing practical recommendations to law enforcement.



Long-term impacts and outcomes:

INTERPOL-coordinated pollution enforcement operations contribute to:

- ▶ Raising awareness and the profile of pollution crime in law enforcement agendas, fostering an increase in global engagement;
- ▶ Establishing a more solid international network of specialized agencies and officers;
- ▶ Collecting and analysing data to identify trends and risk indicators, further supporting countries in conducting intelligence-led actions, and improve their detection rates;
- ▶ Building better resource allocation, technological development, expertise and multi-agency collaboration in participating countries.

- ▶ Nominal information from reported case is regularly crosschecked and integrated into **INTERPOL databases**, for example to identify recurrent offenders.
- ▶ **Investigative and Analytical support meetings** are held by INTERPOL to support countries in advancing pollution investigation, either by gathering countries concerned to exchange information or by deploying Criminal Intelligence Officers in member countries to provide investigative support, upon request.

REGIONAL THREATS

The map below shows a broad sample of regional threats identified by INTERPOL's member countries during operational activities and investigations targeting pollution crime. It is not an exhaustive list but it captures the global and interconnected nature of pollution crime, demonstrating why an international multi-agency response is necessary.

NORTH AMERICA

Vessel pollution violations have been reported in large numbers by North American countries during INTERPOL Operations targeting marine pollution (2018 to 2021), in particular in relation to oil and oily wastewater discharges, associated with document fraud and evasion of authorities.

Illegal waste exports and disposal is a threat attracting growing attention in the region, with electronic, household, plastic, paper and carton waste being identified as the main waste streams concerned by illegal trafficking, while asbestos, waste water and chemical waste including radioactive waste were found in key cases of illegal disposal in the region.

CENTRAL AND SOUTH AMERICA

Pollution of rivers and coastal areas is a regional concern in Central and South America. It is mainly due to **illegal discharges of mercury, plastics and oil**. Illegal discharges of mercury are a consequence of illegal gold mining and have been found in relation to organized crime and a number of connected crimes in the Andean region. Protected coastal areas such as national parks have also been identified as at risk for illegal dumping of waste.

Oil pollution caused by various illegal activities is also reported in the region, in relation to **oil spills and oil slicks** at sea and in ports, with **fuel smuggling**, as well as with **illicit oil refineries** found to be related to arms trafficking in the region.

AFRICA

Waste pollution is a key enforcement target in Africa, due to illegal imports from other regions, illegal dumping in waterbodies and large illegal landfills:

- West Africa is particularly affected by illegal imports of e-waste and end-of-life vehicles, and western African countries have been identified as at risk of becoming destinations for the growing traffic in other waste streams such as plastic, paper, carton and metal waste.

Oil and its byproducts account for a large share of land-based pollution offences identified in the region, in particular in oil-producing African countries where illicit oil refineries have been found and fuel smuggling is reported.

Marine pollution linked to negligence and poor maintenance on board vessels was identified as a key regional trend during INTERPOL operations targeting marine pollution (2018 to 2021), particularly resulting in illegal garbage and oil discharges at sea.

The illegal use and the illegal import of plastic products are emerging threats in the region where a number of countries have recently implemented measures to regulate plastic consumption and production:

- A transnational traffic of non-biodegradable plastic bags was exposed across various Eastern African countries in a 2019 INTERPOL operation.

EUROPE

Waste crime is an important threat in the region with illegal disposal, waste fires, intra-regional trafficking and illegal exports towards other regions identified as growing trends in the recent years:

- The infiltration of **organized crime** in the waste sector has been reported multiple times in the region, including the involvement of large mafia groups engaged in a wide range of other offences and crimes;
- All waste streams are concerned, including waste water, as **sewage discharge** into rivers and coastal areas, in particular from industrial sources, were identified in the region as a type of offence predominantly criminal and deliberate. However, there is a prevalent stream of waste trafficking from Europe to other regions, with European e-waste and tyres illegally exported to landfills in West Africa, and plastic waste and end-of-life commercial vessels to shipyards in Asia.

The illegal use of plastic products is an emerging enforcement target as European countries – in particular the European Union – recently implemented measures to reduce single-use plastics.

Counterfeit pesticides represent an estimated annual revenue loss of EUR 1.3 billion (USD 1.5 billion) in the legitimate pesticides industry in the European Union.

Marine pollution offences related to vessel fuel and emissions are particularly under the radar in Europe.

ASIA-PACIFIC

Waste crime is an important threat in the region with **domestic waste mismanagement** (including landfills and waste fires), **illegal imports from third regions associated with illegal recycling**, and **intra-regional trafficking** identified as growing trends in recent years:

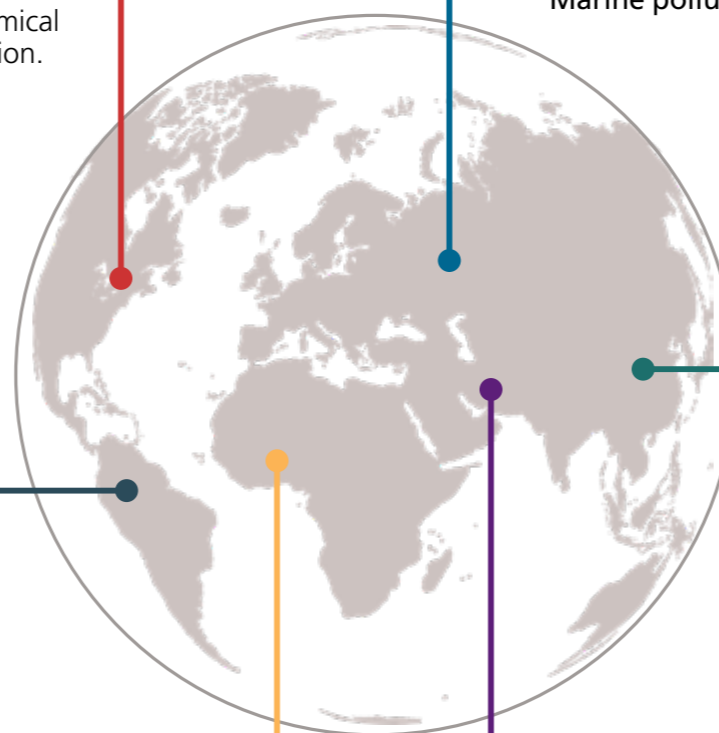
- Plastic waste is an emerging enforcement priority target in South and South East Asia, which have become a major destination for illegal exports in recent years, resulting in an increase in plastic pollution in the region;
- The infiltration of organized crime in the waste sector has been reported as emerging in the region, in particular in East Asia where 90 criminal networks were disrupted during a 2019 month-long INTERPOL operation.

Oil spills and sewage discharges into waterbodies are among the most detected pollution offences in the region.

MIDDLE EAST

Fuel smuggling being predominantly thriving in oil-producing regions, Middle Eastern countries are particularly affected.

Oil pollution both at sea and along the coast is a key focus for pollution enforcement actions in the region, in particular in the Gulf.



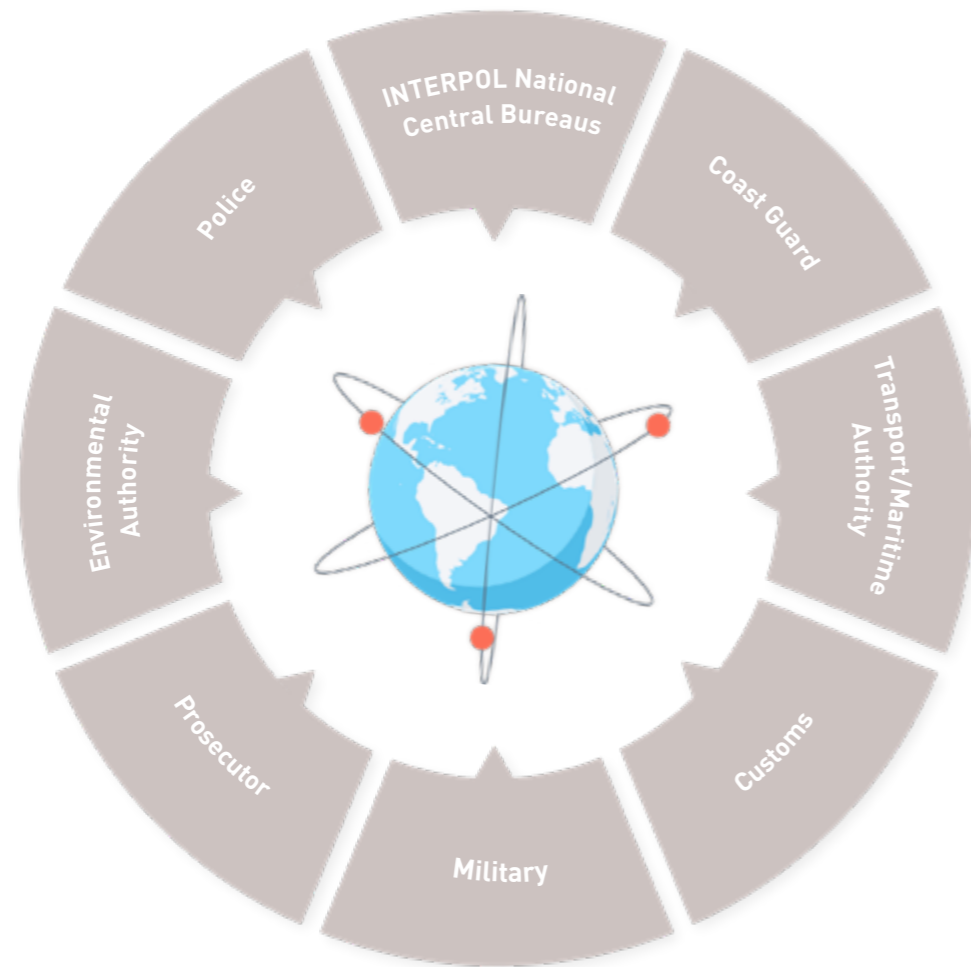
IMPLICATIONS OF SANITARY CRISIS ON POLLUTION CRIME

The drastic increase in the production of medical, packaging and single use plastic waste amid the COVID-19 pandemic has generated a waste management crisis in numerous cities around the world and opportunities for criminals to make profits by illegally managing such waste.

INTERPOL has observed several alarming criminal trends which pose a significant risk of furthering the spread of the pandemic: the illegal recycling and re-sale of used sanitary masks; the increase in domestic trafficking and dumping of medical and sanitary waste; and growing waste dumping and waste fires as a response to waste accumulation.

MULTI-AGENCY COOPERATION

Effective enforcement requires a global multi-agency approach. Due to the diversity of illegal activities involved in pollution crime, and their cross-sector nature, INTERPOL promotes an inclusive and collaborative approach to law enforcement cooperation.



INTERPOL NETWORK

INTERPOL enables real-time police cooperation among its 195 member countries through the secured communication channel I-24/7, which connects a global network of INTERPOL General Secretariat offices, and INTERPOL National Central Bureaus (NCBs) based in each member country.



Where member countries are limited by national borders, jurisdictional boundaries or access to intelligence, INTERPOL plays a critical role in coordinating international cooperation in a timely and effective manner.

INTERNATIONAL COOPERATION FRAMEWORK

By supporting countries to uphold environmental and water security, INTERPOL contributes to achieving the United Nations Sustainable Development Goals, in particular:



INTERPOL POLLUTION CRIME WORKING GROUP

The INTERPOL Pollution Crime Working Group (PCWG) is a global network of national experts that have met annually for the last 25 years to discuss member countries' priority operational strategies and share expertise in the area of pollution enforcement. The Working Group supports INTERPOL in building a globally coordinated response to pollution crimes.

The PCWG Executive Board is active throughout the year to facilitate the Working Group's contribution to INTERPOL's pollution enforcement strategy, operations, investigative manuals and training activities.

CROSS-SECTOR PARTNERS

INTERPOL recognizes the importance of strong partnerships to develop a coordinated response to pollution crime. Partners include: government agencies, intergovernmental organizations, non-governmental organizations, research institutes and the private sector.

OPERATIONAL PARTNERSHIPS

A crucial step towards enhanced operational results, based on increased information exchange and international cooperation

Partnerships have been developed with countries and their competent enforcement agencies that carry out operational activities on the ground, as well as with key international and regional organizations, including:

- ▶ Europol
- ▶ European Coast Guard and Border Agency (FRONTEX)
- ▶ European Maritime Safety Agency (EMSA)
- ▶ European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL)
- ▶ World Customs Organization (WCO)

STRATEGIC PARTNERSHIPS

A key to share resources and expertise in the framework of strategic analysis, strategic communication or capacity building activities

INTERPOL has been collaborating with a wide range of relevant stakeholders on pollution enforcement, including:

- ▶ GRID-Arendal
- ▶ Mediterranean and European Coast Guard Functions Forums
- ▶ Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC) under the International Maritime Organization (IMO)
- ▶ Secretariat of the Basel, Rotterdam and Stockholm Conventions
- ▶ United Nations Environment Programme (UNEP)
- ▶ World Wide Fund for Nature (WWF)

INTERPOL is also part of key international consortia:

- ▶ Basel Convention Plastic Waste Partnership
- ▶ Environmental Network for Optimizing Regulatory Compliance on Illegal Traffic (ENFORCE) under the Basel Convention
- ▶ Green Customs Initiative

Over the years, INTERPOL was enabled to carry out pollution enforcement thanks to financial support from:

- ▶ Environment and Climate Change Canada
- ▶ Norwegian Agency for Development Cooperation (Norad)
- ▶ Scottish Environment Protection Agency (SEPA)

SUPPORTING/FUNDING PARTNERSHIPS

INTERPOL pollution enforcement activities rely entirely on external financial contributions

Data presented in this document originate from INTERPOL operations and reports, as well as external sources including, Grid-Arendal and UNEP (2020), IBIS World (2020), IUCN (2014), UNEP (2011, 2013 and 2018), Science Advances (2018), and the World Bank (2020).



NCBs
Police
Environmental
Customs
Coast Guard
Transport/Maritime
Prosecutor
Military

About INTERPOL

INTERPOL's role is to enable police in our 195 member countries to work together to fight transnational crime and make the world a safer place. We maintain global databases containing police information on criminals and crime, and we provide operational and forensic support, analysis services and training. These policing capabilities are delivered worldwide and support three global programmes: counter-terrorism, cybercrime, and organized and emerging crime.

INTERPOL General Secretariat
200 quai Charles de Gaulle
69006 Lyon, France
Tel: +33 4 72 44 70 00
Fax: +33 4 72 44 71 63
environmentalcrime@interpol.int



WWW.INTERPOL.INT



[@INTERPOL_EC](https://twitter.com/INTERPOL_EC)