It's Time for a More Systematic Focus on Organized Environmental Crimes

Submission to the Open-ended intergovernmental expert group on crimes that affect the environment (IEG) falling within the scope of the United Nations Convention against Transnational Organized Crime (UNTOC) and related offences covered by the Convention will be meeting in Vienna from 30 June to 2 July 2025.

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Organized crime does what traditional street crimes do not: rather than individual illegal acts carried out for personal or financial profit, organized crime is a continuing criminal enterprise that operates rationally and systematically, protecting itself through corruption and intimidation. This is precisely the target of the United Nations Convention against Transnational Organized Crime.

However, the growing threat, breadth, and harm of organized environmental crimes have not gained corresponding systematic attention from governments, businesses, and civil society. The scope of the threat can be illustrated by outlining the nature and types of organized environmental crime, which can be grouped into two large categories: trashing the planet or threatening plants and wildlife (flora and fauna). These types are summarized in the table below.

Threats to the Integrity of the Planet	**Threats to Animals and Plants (flora and fauna)**
Pollution (air, water, soil)	Wildlife poaching and trafficking
Illegal dumping	Deforestation (illegal logging/timber trafficking)
Illegal mining (methods, metals, minerals)	Overfishing
Illegal trade in hazardous chemicals	Habitat destruction (disrupting ecosystems)
Climate change violations (greenhouse gases)	Illegal use of pesticides and herbicides

Systematic attention is lacking under UNTOC in its current form

The UNODC and other organizations have produced several useful reports in recent years; however, more systematic attention is needed to address the seriousness of the threat (see Global Initiative against Transnational Organized Crime, 2019; UNODC, 2024). A new protocol that applies existing UNTOC enforcement provisions is one path to drawing the world's attention to the seriousness of the need for prevention and a coordinated response to organized environmental crimes.

Documented convergence between environmental crime and other serious crimes

Interpol reports a link between environmental crime and other organized criminal activities, with 84 percent of countries reporting a convergence between environmental crime and other serious crimes (see Interpol-UN Environment, 2016; Crosta, 2025), including:

- Corruption (42 per cent)
- Counterfeiting (39 per cent)
- Drug trafficking (36 per cent)
- Cybercrime (23 per cent)
- Financial crime (17 per cent).

Environmental crime as organized crime

Criminal enterprises select markets to exploit using the same considerations as legitimate businesses, asking the question, "Is it possible to survive and make a profit in the market, given the existing nature of the supply, demand, regulators, and competitors?" (Albanese, 2020). Most monitoring of organized environmental crime is conducted by NGOs, rather than by governments, due to a lack of mandate. The Convention on International Trade in Endangered Species of Wild Fauna and Flora, commonly referred to as CITES, outlines rules for trade in over 35,000 protected species; however, it does not require criminalization, enforcement, or international cooperation, as is provided by the UNTOC.

> *Organized environmental crime has a direct impact on environmental quality, endangers biodiversity, contributes to the depletion of natural resources, and causes harm to humans. It is time that it be treated as a form of organized crime, using the tools created in the United Nations Convention against Transnational Organized*

References

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