

Minutes – Seventh meeting of the Environmental Crime and Corruption Working Group

30 November 2022

Minutes

Opening remarks

The seventh meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman. Olivia welcomed the participants. Olivia announced that Lisa Hartevelt, Director of External Relations at the Wildlife Justice Commission (WJC), will chair the ECC Working Group moving forward.

Tour de table

During the tour de table, Working Group members were invited to raise forward any opportunity that could be of relevance to fellow members.

World Wildlife Fund International (WWF) introduced the soon-to-be-launched Countering Environmental Corruption Practitioners Forum. This forum is co-created by WWF, Transparency International, Basel Institute on Governance and TRAFFIC, with the support of the United States Agency for International Development (USAID) and the Principality of Liechtenstein. This initiative will connect practitioners across the globe from the conservation and anti-corruption communities to innovate, collaborate and exchange knowledge to build practical solutions.

The National Whistleblower Center (NWC) highlighted that the Treaty negotiations on plastics were currently happening in Uruguay, which IUCN is working on advancing. NWC also flagged the [deadline](#) on 2 December 2022 for submitting comments to the US State Department on combating international deforestation.

The WJC introduced two reports it released recently and their link to corruption, namely [Rhino horn trafficking as a form of transnational organised crime \(2012–2021\): 2022 Global Threat Assessment](#) and [To skin a cat: How organised crime capitalises and exploits captive tiger facilities](#). Both reports are placed on the [Working Group webpage](#) under “relevant resources”.

Updates and developments following COP27

Transparency International (TI) provided a few takeaways from COP27 which are of relevance to the ECC Working Group. TI has been looking at issues of undue influence from some industries (fossil fuel industry in particular) for several years. 630 public participants at the Conference were from the fossil fuel industry, more than usual, with the CEO of BP forming part of the national delegation. TI noted that a group with clear conflicts of interest at an industry level was very present at the COP.

On the sidelines of the COP, there were many conversations surrounding what the role of civil society could be, avenues for intervention and how participation is made possible. There was even more dialogue and critique about the way negotiations were happening this year.

In the outcomes of the COP, there was much discussion about the international financial system. The main outcome was the establishment of the Loss and Damage fund - there were still a lot of questions about the specifics and practicalities of this fund. Beyond the UNFCCC and Fund announcement, there was a partnership with Indonesia (led by the US and Japan) that might be worth following. On transparency issues, the Compliance Committee checks the compliance of parties in terms of the information they submit (but not the quality of information). On Article 6 and common markets, where corruption risks are rife, there is an advisory body in charge of overseeing the operations of the Article, which drafted recommendations just before the COP, but these were rejected by the Conference. It was noted that there should be some kind of civil society involvement in this monitoring initiative. On accountability, discussions about 'greenwashing' were amplified at the COP by the UNSG's call for companies to report on their environmental initiatives.

There was also some criticism that there were not enough linkages at COP27 to the [15th Biodiversity COP](#), which is happening after the IACC in December. In this regard, WG ECC members discussed the idea to identify the synergies between different international frameworks and how the Working Group could utilize them for its advocacy.

Roadmap for 10th UNCAC COSP

Environmental Crime and Corruption Survey results

Following the 6th meeting of the WG ECC held in September, the UNCAC Coalition circulated a survey with all members with the aim to define the WG ECC's objectives and areas of focus to advance efforts to tackle environmental crime and corruption collectively. The UNCAC Coalition presented the survey results, as follows:

What do we want to improve?

1. Develop clear aims for the ECC Working Group: what do we want to achieve, how, and when; select a subset to focus on;
2. Seek greater interaction between UNODC and UNOHCHR as the Secretariats, respectively, of the UNCAC and the UN Human Rights Council and its Special Procedures, with a view to advancing the mutually reinforcing objectives of reducing corruption and its adverse human rights impacts;
3. Develop and implement a communications strategy to disseminate our advocacy messages, make key points of discussions available to the public via social media, and participate in international conferences;
4. Identify and promote collaborations within the ECC Working Group;
5. Include the voices of indigenous groups in the WG and focus on amplifying their voices, as well as the voices of domestic NGOs working on environmental crimes.

What activities and joint advocacy efforts should we focus on?

1. Create a database that collects tools, resources, and best practices on environmental crime and corruption;
2. Carry out joint projects and studies to promote the integration of the group and to further develop our understanding of key issues and how to address them, partner with think tanks
3. Promote capacity building of WG members as well as government officials;
4. Reach out informally to UNOHCHR with a view to mapping out through what mechanisms and which processes UNODC and UNOHCHR could fully support respective agendas, and to explore whether some form of formal agreement would be helpful in this regard;
5. Promote the adoption and effective implementation of robust policies and measures to tackle environmental crime and corruption:

- provide updates on policy developments
 - transmit knowledge and concerns from national and regional organizations to policymakers in Vienna to shape policy discussions
 - develop specific regionally-focused policy papers
 - present specific ongoing cases of environmental crime to develop approaches and strategies to prevent and disrupt them using different channels,
 - carry out active advocacy in selected international and regional meetings
 - build on opportunities emerging from the new US beneficial ownership rule and identify other fora like Open Government Partnership and EITI that we could collaborate with and influence their priorities
 - monitor the implementation of international instruments to combat environmental crime and corruption
 - invite prosecutors to present cases and discuss what civil society could do
6. Ensure that anti-corruption activists and wildlife crimes experts work jointly on transversal themes rather than in their respective silos;
 7. Create collaboration opportunities for anti-corruption activists and entities to engage with wildlife and environmental activists on ECC issues.

Resolution on Environmental Crime at the 10th UNCAC COSP

In addition, the UNCAC Coalition gave an update on the Draft Resolution on Environmental Crime at the [10th UNCAC COSP](#). This resolution is a key part of the roadmap for the COSP and has the key advocacy objectives to develop and build on [UNCAC COSP Resolution 8/12](#) on Preventing and combating corruption as it relates to crimes that have an impact on the environment adopted at the 8th UNCAC COSP. The resolution will reunite the Working Group policy asks and aims to create synergies between the different issues addressed, including combatting bribery, protecting and incentivizing whistleblowers, promoting transparency, and public procurement. It will also provide concrete action for the UNODC to work with other bodies and mechanisms to foster synergies.

The draft resolution will be shared with all working group members for input at the end of the year or at the beginning of the new year. The next steps will then to approach governments to take the resolution forward to the 10th UNCAC COSP. Certain states seem keen on the resolution, but no official interest has been confirmed yet. Basel Institute on Governance suggested France as a good candidate to approach as well.

Suggestions for the next meeting and action points

The Working Group agreed that the draft resolution for the 10th UNCAC COSP will be shared by the end of this year or at the beginning of the new year. Members are invited to provide their input on the resolution once it is shared.

Resources shared

- [Rhino horn trafficking as a form of transnational organised crime \(2012–2021\): 2022 Global Threat Assessment.](#)
- [To skin a cat: How organised crime capitalises and exploits captive tiger facilities.](#)
- [IUCN's Position Post-2020 Global Biodiversity Framework](#)
- [IUCN Position Paper for INC-1 Plastic Pollution Treaty](#)

Minutes – Sixth meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The sixth meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman. Olivia welcomed the participants.

Tour de table

During the tour de table, Working Group members were invited to raise forward any opportunity that could be of relevance to fellow members. Working Group members discussed workshops submissions for the [International Anti-Corruption Conference \(IACC\)](#) held in December in Washington D.C, along with side-events to the upcoming [UNFCCC COP27](#) taking place in November, in Sharm El-Sheikh, Egypt. Transparency International announced that it will soon publish a paper on illicit financial flows and environmental crimes, while the Wildlife Justice Commission announced the upcoming publication of a case-study on one of Vietnam’s most prolific wildlife traffickers. Another working group member shared that GIZ is organizing a Global Forum on the 28 and 29 of September with a technical session on Environmental Conservation titled “Catalysts of change: Building partnerships to follow the money of environmental crimes”. This event is to be shared through the ECC WG mailing list once it the registration link is available.

Resolution on Environmental Crime at the 10th UNCAC COSP

Ahead of the [10th UNCAC COSP](#), to be held in the United States in December 2023, the UNCAC Coalition has been engaging with delegates in view of assessing appetite for potential draft resolutions on environmental crime. The UNCAC Coalition suggested that a small subset of members help the Working Group develop a draft resolution on environmental crime and to develop relevant policy recommendations well ahead of the COSP to ensure that Parties can support the project. Interested organisations should manifest themselves to the UNCAC Coalition, should they be willing to participate. The first draft of the resolution should ideally be completed by end of November or early December.

Presentation: Climate Change, Corruption & Human Rights: Connections and Policy Solutions

This session’s theme was ‘Corruption and Human Rights, connections and policy solutions’ presented by Keith Slack, Director of Strategy and Campaigns at [EarthRights International](#). Keith’s presentation touched upon the nexus between climate change and corruption, specifically how corruption is a key driver of climate change and what can be done to link climate change and anti-corruption agendas.

The Working Group learnt of the interlinkages between corruption, climate change, and human rights violations, namely through deforestation, illegal natural resource extraction, cooptation of public security forces by fossil fuel companies, non-enforcement of laws, criminalization of defenders and impunity of crimes. Keith provided a multitude of examples to illustrate illegal natural resource extraction activities, from the mining, logging, oil and gas, and palm oil being extracted in protected forest areas (such as the Amazon, Congo Basin, and Southeast Asia), to the example of Peru, whereby 30% of gold and 80% of timber exports are of illegal origin. Keith also highlighted the non-enforcement issues allowing these illegal activities to occur without impunity, such as the non-enforcement of licenses, inadequate environmental reviews and non-transparency. Keith further touched upon the issue of criminalization and violence perpetrated against environmental defenders, who are experiencing judicial harassment and being charged with spurious charges.

Keith then went on to outline policy solutions to tackle these issues. He highlighted the need to advocate for corruption to be perceived as a driver of climate change, and the need to link global climate and anti-corruption agendas. In addition, Keith emphasized that targeted sanctions and anti-illegal deforestation laws would be effective measures to address the nexus between corruption and environmental offences. Keith also stressed the need to strengthen environmental defenders' protection. Keith laid out several solutions in this regard, namely the development of adequate protection mechanisms, non-retaliation policies, collective protection measures, anti-criminalization training, and indigenous autonomy. Finally, Keith concluded with the need to strengthen public demand for accountability and climate governance.

Following this presentation, members of the Working Group highlighted that only discussing the nexus of climate change and corruption may narrow the scope of actions in view of other environmental issues such as illegal wildlife trade and other biodiversity loss issues. Members also welcomed the solutions presented by Keith to be included in the draft resolution for the 10th UNCAC COSP.

Suggestions for next meeting and action points

The Working Group agreed that a small subset of members will help the Working Group develop a draft resolution for the 10th UNCAC COSP. Members are invited to use the mailing list to share their updates and interest in future presentations for the Working Group to consider.

Resources shared

- [UNCAC COSP Resolution 8/12](#)
- [IUCN World Conservation Congress – “Resolution 115 Protecting environmental human and peoples’ rights defenders and whistleblowers”](#)
- [Climate Week New York](#)
- [The Climate Justice Camp](#)
- [UN HRC – Report of the Special Rapporteur on the situation of human rights defenders Environmental Defenders](#)
- [Escazú Agreement](#)

Minutes – Fifth meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The fifth meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman. Olivia welcomed the participants and congratulated the working group for its [submission to the UN Special Rapporteur to Human Rights and the Environment](#) and to [the 13th session of the UNCAC Implementation Review Group \(IRG\)](#). We have received good feedback from these submissions.

Tour de table

Members of the working group discussed a variety of opportunities to consider ahead of the summer. The first of them was the UNGASS Intersessional to be held in early September. The UNGASS Political Declaration failed to mention the Environment and Climate as issues of relevance. The ECC WG could prepare a submission stressing the link between corruption and environmental crises. This could be essential in ensuring that an environmental angle starts to be included in these discussions. In a similar fashion, the ECC WG discussed the potential preparation of a workshop for [the International Anti-Corruption Conference](#), held in Washington D.C. in December. It was agreed by the ECC WG that including a climate angle to the anti-corruption would be needed, as these issues are often left out of anti-corruption conversations. To ensure that the ECC WG effectively starts to work on these two issues, a smaller subset of working group members will convene to guide the process.

The [UNODC's legislative guide on combatting waste trafficking](#) was also shared as a relevant resource for the working group members to consider.

Panel discussion: Making Financial Investigations into Environmental Crime a Reality

This panel discussion was moderated by Juhani Grossmann, Team Leader, Green Corruption Program at the Basel Institute on Governance. This discussion aimed to deal with the disconnect between the reality on the ground and the rhetoric when it comes to financial investigations into environmental crime. This panel thus aimed to hold a friendly discussion as to how to ensure that financial investigations become the norm and not the exception.

Tim Steele, Anti-Corruption Senior Advisor at the UNODC introduced the ECC WG to the variety of individuals that commit environmental crimes. Their profiles differ in function of the crime type studied. Criminal sometimes form business-like structures, with different levels of responsibility to facilitate their activities. However, when studying forest loss, legitimate businesses play a more active role. Often motivated by agri-food or mining concerns, these businesses facilitate their activities through corruption. Yet, this corruption starts much earlier than with other forms of environmental crime: by facilitating what is defined as legal timber and amending relevant legislation. Fisheries crime

also entail a different level of organisation and corruption. Tim Steele invited the ECC WG to consult the Fishrot Files for an example of high-level corruption in this space.

Jenna Robertson, Senior Intelligence Analyst at the Wildlife Justice Commission (WJC), presented the WJC's approach to casework, how it investigates transnational organised crime, and the type of information that can be gathered from these investigations, and how this can lead to the collection of key intelligence for the conduct of financial investigations. Although, financial investigations can be daunting at first, Jenna insisted that it is essential for financial investigators to start small, focusing on one particular aspect of a case, and further broaden the scope as the investigation progresses.

Manuel Medina, Intelligence Analyst at the Basel Institute on Governance, outlined and explained the Basel Institute's approach to bolstering capacity for effective financial investigations into environmental crime. The cornerstone of the Institute's work entails embedding financial advisors in relevant units to mentor and assist financial investigations. An essential step in this approach is to identify which unit or agency to engage with for the most impact. It is then necessary to address the problem of the lack of systematic data collection in the field. Too often, investigations end at seizures and information pertaining to financial investigations is not gathered, and thus cannot be analysed. It is essential to change mentalities and put an emphasis on collecting this data for analytical purposes. Manuel concluded by stressing the need for investigators to follow the value and where criminals make profit.

The panel then discussed whether advanced databases were required for these investigations. The panel agreed that it was not the case, and that financial investigations could begin out of software such as Excel. There is only a necessity to understand the variety of information that is to be analysed, and what is the most relevant tool to analyse it. The panel then discussed the necessity for prioritization to ensure that these crimes are effectively addressed and for financial investigations to become the norm. Although it was discussed that certain environmental crimes enjoy more political willingness to be addressed, which could result in a more systematic use of financial investigations, the high-level political will to address these crimes has yet to trickle down to the strategic level.

Suggestions for next meeting and action points

The Working Group agreed that a small subset of members will help the working group develop its position for the two outputs discussed during the tour de table.

Minutes – Fourth meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The fourth meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman. Olivia welcomed the participants and congratulated the working group for its submission to the UNCAC CoSP and for the Royal United Services Institute's [blog post](#) that stemmed from it.

Tour de table

Members of the working group discussed [an event](#) organised by the End Wildlife Crime Initiative and the Global Initiative against Transnational Organised Crime on whether an additional protocol is required to address wildlife crime. Targeting Natural Resources Corruption's [latest report](#) on the drivers of deforestation in Colombia was also raised as a relevant resource for working group members to consult.

Update on key multilateral conference

Yonatan Yakir from the UNCAC Coalition outlined the main developments of the ninth UNCAC CoSP. The environment as a theme was mentioned a few times in the [final report](#). However, no resolutions were published on this matter (see [UNCAC Coalition summary of resolutions](#)). Nevertheless, the UNODC published [a report on the implementation of resolution 8/12](#) (linking corruption and environmental crime). Resolution 9/1 touches upon discussing international cooperation in times of emergency. This language could be relevant to environmental crimes as it could be extended to cover environmental crises. The shrinking civic space at the COSP was also an important subject of debate, with various NGOs not being allowed to attend.

Olivia offered brief comments on the conclusion of the Commission on Crime Prevention and Criminal Justice's Expert Discussions on Crimes that Affect the Environment, held in Vienna from 14 to 16 February. Each day focused on a specific topic relating to how to curb these crimes: preventing environmental crimes, combating environmental crimes, and strengthening international cooperation. Various members of the working group participated in these discussions. Corruption was heavily discussed during the first day of these discussions. Many great resources were shared during this event and most of the interventions are now accessible on the [Expert Discussions' website](#).

Advocacy opportunities for the working group in 2022

The Working Group discussed the advocacy opportunities that it should focus on for 2022. The first identified opportunity was the meeting of the UNCAC Implementation Review Group (IRG) in June. Similarly, to the first submission of the working group, the NGO Briefing of the IRG is an opportunity for civil society to raise key topics to delegates working on these matters. The Working Group agreed that it could re-use much of the content that was prepared for the UNCAC CoSP given the quality of this previous submission. Its context would be updated, and it will be circulated to the working group for comments. The call for input by the UN Special Rapporteur on Human Rights and the Environment (David Boyd) on "transformative actions needed to achieve the Sustainable Development Goals

related to the environment” was also discussed. Given this new scope, it was agreed that a new document would be prepared. Nevertheless, many of the recommendations that were established for the CoSP are relevant to this context and will be able to be re-used. Another identified opportunity was the UNGASS Intersessional meeting that is to be held in September. The Working Group could make a submission about what was not included in the UNGASS declaration. It was decided that a submission to the UNGASS would be discussed during the next meeting. Most of these documents could aim to build momentum for the publication of another resolution on environmental crime at the tenth UNCAC CoSP in 2023.

Presentation on a transversal theme and exchange

This session’s theme was “Access to information rights and laws: global good practices and lessons from the Mekong region” presented by Stephano Zenobi, Data and Transparency Specialist, WWF Greater Mekong. Stephano’s presentation touched upon a research project by the Asian Institute of Environment Law (ARIEL) for WWF Greater Mekong under the Mekong for the Future project. This study is concerned with the right to access information in environmental matters in the region.

The working group learned about the interlinkages between access to information and supporting transparency and accountability, thus reducing corruption and mismanagement. The global context of access to information was presented (the Aarhus Convention and the Escazú Agreement) alongside some of the relevant policies and laws in Asia. The Working Group then learned of the more concrete state of access to information in countries within the Greater Mekong region. In conclusion, Stephano outlined the study’s long-term objectives: developing a soft policy instrument that further promotes procedural rights in the ASEAN region. This is in view of setting clear expectations regarding access to information and addressing the interrelated procedural human rights that underpin effective natural resource governance.

Suggestions for next meeting and action points

The working group discussed addressing the link between environmental crime and climate as a topic to further explore, alongside potentially a presentation on corruption in the fisheries sector.

Minutes – Third meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The third meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by [Nathalie Veenman](#). Nathalie welcomed the participants and congratulated the working group for their input and the UNCAC Coalition for coordinating the ECC WG's submission to the Conference of the State Parties (COSP) to the UNCAC.

Tour de table

During the tour de table, Working Group members were invited to raise forward any opportunity that could be of relevance to fellow members. The working group discussed [the revision of the EU Action Plan against Wildlife Trafficking](#) as an avenue to raise the crime's link with corruption. The [US Summit for Democracy](#) was presented as an important opportunity to monitor for anti-corruption commitments. The Summit will be organised on 9 and 10 December 2021. At the time of writing, no side-events were concerned with environmental matters. This summit will be an important milestone as it is to be followed by a year of action and potentially another summit. Key commitments can be expected to be made during this event. Another important development to monitor is the [Open Government Partnership Global Summit](#), held the same week as the UNCAC COSP from 15 to 17 December 2021.

UNCAC Updates

Mathias Huter offered some comments as to the preparations for the UNCAC COSP. There is currently no information pertaining to a follow-up for resolution 8/12 on "Preventing and combating corruption as it relates to crimes that have an impact on the environment". Nevertheless, progress is being made in the area of beneficial ownership transparency, a topic that is gaining grounds in various international instances. Nigeria will introduce a resolution on this topic, with the angle of asset recovery. Key states that have historically slowed down these discussions must come around to ensure that this resolution effectively moves forward. Turkey has objected against the participation of various NGOs. The US will host the next COS as it is trying to position itself as a leader on this subject.

To the working group's knowledge, there are only two side-events organised at the COSP that are dealing with environmental matters: one side-event organised by the Basel Institute of Governance and one organised by the Wildlife Justice Commission. The full program has not yet been published but should be released in the near future.

Presentation on a transversal theme and exchange

This session's theme was "corruption risks in supply chains" presented by Liz Hart, Chief of Party, Targeting Natural Resources Corruption (TNRC). Liz's presentation built on the insights gathered during a symposium jointly organised by the Luc Hoffman Institute and TNRC. The Working Group learned about the different types of environmental crime supply chains, such as strictly illegal and mixed legal and illegal supply chains, the various entry points for corruption, the required priority

changes needed to address this problem (whether the focus should be on law enforcement efforts, community engagement, and moving away from an emphasis on poachers). The value of a corruption lens when looking at issues of environmental crime was made clear. This lens allows practitioners to look beyond the act of poaching and trying to understand the “higher forces” that are driving these acts. The necessity for partnerships, a clearly define concept of corruption, and better assessments of drivers and facilitators were all areas where further action is required.

Following this presentation, the Working Group discussed how to bridge the language between strictly illegal supply chains and mixed legal and illegal supply chains. It was highlighted that debates on supply chain risks are actually not happening within UNCAC as a fora. This is a missed opportunity. These discussions are probably being held in other fora than the UNCAC but because of siloes within governments, this cross pollination does not occur. The necessity for effective mitigation measures were also discussed. Improving corruption resilience should be a part of the strategies concerned with addressing these issues. Engaging with local communities and rangers directly were discussed as a potential course of action to curb the corruption. The awareness of the private sector and the corruption risks they face were also identified as opportunities for engagement.

Suggestions for next meeting and action points

Access to information and global good practices on corruption were suggested as potential topics for the next meeting of the working group.

Minutes – Second meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The second meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman. Olivia welcomed the participants and congratulated the working group for their input and the UNCAC Coalition for coordinating the ECC WG's first submission to the Implementation Review Group of the UNCAC.

Tour de table

This agenda point will remain for every meeting and will be the occasion for participants to share their thoughts, relevant developments that ought to be shared, and make connections with other members of the ECC WG working on similar issues.

The ECC WG discussed the importance of engaging with the private sector in relation to corruption and environmental crime. The intersection of these issues is of relevance to companies that would like to have more clarity into their supply chains. Issues surrounding climate change and environmental crimes and their intersection with corruption are of particular interest to the private sector. Yet, private companies often lack the understanding of the developments in these fields, something that civil society organisations working on this intersection could alleviate. The private sector could become an important advocate and a champion in tackling these issues. However, there is often a disconnect between the private sector and civil society organisations working on environmental crime and/or corruption. This is something that ought to be addressed and which could be a potential avenue to explore for the ECC WG.

For members that would like to learn about more about the nexus between environmental crime and corruption, the WJC is launching a series of webinars with the International Anti-Corruption Academy. This will be a three-part series where the nexus, relevant corruption themes, and law enforcement responses will be explored.

9th Conference of the State Parties to the UNCAC and joint advocacy

Mathias Huter, Managing Director of the UNCAC Coalition, presented the context for the upcoming UNCAC Conference of the State Parties (COSP). The one week-long event will an important advocacy opportunity for actors involved in this field. The COSP will be the held amongst a series of international gatherings held in December all creating important momentum to address corruption, with the [Open Government Partnership Global Summit](#) and the [Summit for Democracy](#) both held around that time. The UNCAC COSP will be held in person but will have hybrid components. The deadline for non-ECOSOC NGOs to register has already passed although it is still open for ECOSOC accredited NGOs.

During the UNCAC COSP, civil society organisations will not be able to monitor debates for resolutions. However, they can request to be added to government delegations to monitor these developments. Nevertheless, this is contingent on having a good relationship with a delegation.

Civil society organisations can hold side events. The deadline for the application is 30th of September. However, it is possible that this deadline will be slightly extended. Any organisation accredited to participate can apply. In the past, the topic of environmental crime has not been heavily present, and it would thus be essential to raise this issue.

The UNCAC Coalition has not seen any government working on a resolution on environmental crime but there is still time for governments to take initiative on these issues. The ECC WG will prepare a written submission to the UNCAC COSP.

Presentation on a transversal theme and exchange

This session's theme was financial intelligence and tackling corruption, presented by Jenna Hurst. Jenna explained issues related to money laundering, Financial Intelligence Units (FIUs), various reporting entities and financial transaction reports, the role of Politically Exposed Persons and of Heads of International Organisations, corruption indicators, and of the value of financial intelligence in fighting this corruption. The Working Group sought clarifications on some of the concepts and mechanisms presented.

The ECC WG inquired about the most effective way to engage with FIUs as civil society. Private-public partnerships were suggested to be one of the most effective way to engage with FIUs. Nevertheless, FIUs work with a set list of priorities. For a certain crime type to be dealt with, it must be prioritised, following which relevant indicators will be developed by the FIU. Nevertheless, certain FIUs suffer from a lack of capacity that can influence their ability to deal with a broad range of issues. The pressure to prioritise these issues must come from the higher level of government. Developments such as the [G7 Finance Ministers & Central Bank Governors Communiqué](#) are important steps in prioritising these issues. It is essential for some countries to lead by example for environmental crime to be incorporated as part of the priorities.

Suggestions for next meeting and action points

The Working Group discussed how to best address some of the issues pertaining to environmental crimes and FIUs at the upcoming COSP. Organising side-events to raise awareness these issues would be an important step to generate momentum. Moreover, outreach to donors would also be important to finance projects to address these issues, as they could also have an interest in seeing them tackled. A more important ask would be to have State try to support specific language in a resolution for the COSP, and more importantly having a State champion these issues. However, the State Parties that were previously involved in these discussions are waiting for more public awareness to increase about environmental crime so that other States can help them move the topic forward. Resolutions are usually drafted around this time of year to be discussed at the COSP.

The ECC WG discussed the usefulness of potentially developing a "Green" Magnitsky Act in view of tackling corrupt actors that are often out of reach from judicial system in the countries where they are established. This could be an interesting avenue for the working group to develop.

Resources shared

- [Jenna Hurst - Presentation on Financial Intelligence](#)
- [Submission of the Environmental Crime and Corruption Working Group to the first resumed 12th Session of the UNCAC Implementation Review Group](#)
- [ACAMS & WWF – Training on AML and Wildlife Trafficking](#)
- [TNRC – Targeting corruption and its proceeds](#)
- [WJC & IACA – Panel discussion on Environmental Crime and Corruption](#)

Minutes - First meeting of the Environmental Crime and Corruption Working Group

Minutes

Opening remarks

The first meeting of the Environmental Crime and Corruption Working Group (ECC WG) was chaired by Olivia Swaak-Goldman, Executive Director of the Wildlife Justice Commission (WJC). Olivia welcomed the participants, and introduced the concept and objectives of the first meeting of the ECC WG.

Objectives of the ECC WG

The ECC WG holds for general purpose to fill a gap in the coordination of policy work amongst relevant actors especially for the benefit of the diplomatic community in Vienna. The WG wants to be inclusive and will complement existing projects exploring this nexus. It is an informal WG which aims at breaching silos between the corruption and environmental crime communities. The objectives of the working group are the following: (i) sharing updates, (ii) presenting reports and findings; (iii) transmitting knowledge to policy makers; (iv) discussing issues not addressed in other fora; (v) coordinating advocacy; and (vi) connecting experts from different backgrounds on transversal themes.

Tour de table

Members were invited to introduce themselves during the “tour de table” and share their expectations of the working group.

Recent development of the concept of Environmental Crime in multilateral instances

Anne-Aurore Bertrand, Director of External Relations of the WJC, outlined a list of the latest policy developments around the concept of environmental crime. This list was non-exhaustive and aimed at building a common foundation of knowledge amongst the participants for the upcoming meetings.

These were: the UNGA resolutions [75/196](#) and [69/314](#) (which has been renewed in 2016, 2017, 2019 and will be renewed this year); CITES [resolution 17.6](#); UNCAC [resolution 8/12](#); UNTOC [resolution 10/6](#); the [Kyoto Declaration](#), paragraph 87; and the [CCPCJ resolution L.4](#).

These resolutions have played a significant role in shaping the policy landscape in this field. The importance to identify and work with the relevant stakeholders in Vienna was also raised as a priority.

Other references were provided by the participants during the meeting. These can be retrieved at the end of this document in the “Resources Shared” section.

Prospects for Environmental Criminality in the Anti-Corruption arena

Mathias Huter, Managing Director of the UNCAC Coalition, provided updates around the latest developments in the anti-corruption sector. The focus was placed on the UNGA Special Session against

Corruption's (UNGASS) [Political Declaration](#), which did not mention the concept of environmental crime or the climate crisis. Mathias provided updates on the topics of public procurement transparency, beneficial ownership, access to information, whistleblowing, and the role of civil society.

Mathias also laid out the next steps for the policy agenda for the Anti-Corruption world, which is centred around the UNCAC COSP in December in Sharm El-Sheikh (Egypt). The UNCAC Coalition will engage in some advocacy work with Vienna-based diplomats in view of reinforcing the language of resolution 8/12. Participants were invited to reach out to Mathias if they are interested in joining these advocacy efforts.

Presentation on Crime Convergence

The transversal theme chosen for this meeting was the convergence between wildlife crime with other forms of transnational organised crimes. This topic was presented by Anne-Aurore.

Organised criminal groups are commodity agnostic and will use their criminal structures for a variety of different crimes (either other types of environmental crimes or other forms of organised crime such as human or drug trafficking). Corruption plays an important part in supporting these structures.

Understanding crime convergence allows the relevant authorities to map out the corruption upon which organised crime groups rely. Crime convergence presents important investigative and intelligence opportunities for law enforcement action, and an opportunity to address corruption to effectively disrupt the activities of the criminal network in the long run. Thus for example the findings of the Dragon [report](#) relating to the role played by corruption in the trafficking of turtles and tortoises still remains valid years after its issuance.

The Wildlife Justice Commission's [report](#) on crime convergence covered 12 case studies including wildlife trade, fishery and timber crimes, spanning the globe. 6 categories of convergence were identified. Corruption was found in almost all cases and can be classified in the category of embedded convergence. Amongst the recommendations to policy makers and law enforcement, two concern specifically corruption (i) the use of alternative legislation to address wildlife crime and (ii) the use of financial and corruption investigations conducted in parallel or in response to wildlife crime cases.

Concluding remarks

Finally, the group discussed the idea of developing new tailored conventions to address these issues and potential topics for the next working group meeting.

Action Points

1. An email discussion list has been set up by the UNCAC Coalition, to which the participants and others who have signed up for the working group have been added. Members are encouraged to share relevant information and documents, and coordinate advocacy efforts through the list: ecc@lists.uncac-coalition.org. Please note the Guidelines and Etiquette for the list. The UNCAC Coalition also hosts a webpage for the ECC working group through which others can sign up to join.
2. Participants interested in joining forces to the UNCAC Coalition advocacy efforts for the UNCAC COSP are to reach out to Mathias Huter: mathias.huter@uncaccoalition.org. Opportunities to engage will also be shared through the email discussion list.

3. Participants are invited to send further suggestions for the theme of the next meeting. The themes already identified in the meeting are: grand corruption, human rights, gender, and reflecting on additional protocol.

Resources shared

- Human Rights Council (January 2017) – [Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment](#)
- Side event to the UNGASS against Corruption (dated June 2021), [Leveraging the best tools to address environmental crime enabled by corruption](#)
- Report from the Financial Action Task Force (July 2021) – [Money Laundering from Environmental Crimes](#)
- [Gabon and Costa Rica call for a new global agreement to prevent and combat wildlife crime](#)