



*Brussels, the 15 of April 2021*

Dear Members of the Standing Committee on Operational Cooperation on Internal Security,  
Dear President Charles Michel,  
Dear Commissioner Ylva Johansson,

As you are currently discussing the priorities for the next EU Policy Cycle for organised and serious international crime (EMPACT) for the period 2022-2025, we would like to raise your attention on a crucial issue: the absolute necessity to include in the Cycle's priorities the fight against all forms of environmental crimes.

According to Interpol, environmental criminality has become in just a few decades the world's third largest crime sector<sup>1</sup>, growing at 2-3 times the pace of the global economy. According to Europol, it is now as lucrative as drug trafficking. Interpol estimates that looting and destruction of nature is now worth \$110-280 billion a year in the world, and Europe is not spared. Faced with an unprecedented environmental crisis in Human history, we must show no tolerance towards those who criminally destroy the environment. This should be one of our top priorities.

Several actors have already raised the issue, including the European Network of Environmental Criminal Investigation Agencies (EnviCrimeNet), which works on the ground to fight environmental crimes despite limited resources. Moreover, several Member States have supported the inclusion of all environmental crimes in the next Policy Cycle-EMPACT. Yet, according to the recently published Europol Serious and Organized Crime Threat Assessment (SOCTA)<sup>2</sup> conclusions, the references to environmental crimes are related to those criminal activities that seeks to infiltrate and exploit the recycling and renewable energy industries. We consider that Environmental crimes are not limited to this.

Far from it, an adequate response to environmental crime in the EU requires a broad approach, addressing any crime associated with waste and pollution related crimes, wildlife crimes concerning any related areas such as wildlife trafficking (including timber trafficking), IUU fisheries, poaching, illegal harvesting, illegal poisoning, etc; plus any other crimes that result in the loss of biodiversity considering criminal forest fires, urban planning linked to protected areas, introduction of invasive species, irregular trade and use of pesticides, etc. Considering that most of these crimes require complex transversal investigation techniques such as money

---

<sup>1</sup> Interpol-RHIPTO (2018): <https://globalinitiative.net/wp-content/uploads/2018/09/Atlas-Illicit-Flows-FINAL-WEB-VERSION-copia-compressed.pdf>

<sup>2</sup> <https://www.europol.europa.eu/activities-services/main-reports/european-union-serious-and-organised-crime-threat-assessment>

laundering, document fraud, corruption, as well as the investigation of cyber-crimes, the European Union must commit to fight all of these crimes.

Our request is even more crucial as we are preparing this year to revise the EU directive 2008/99/EC of 19 November 2008 on the protection of the environment through criminal law (ECD). The ambition for this revision is clear from all parts: improve European criminal law to better protect the environment, through an extension of the scope of the Directive, a better harmonization and cooperation between Member States. Yet, if we want to make sure that this revised Directive will be correctly implemented in all Member States, we must in the first place ensure the allocation of adequate resources to the fight against environmental crimes. Making those crimes a priority in the EMPACT Policy Cycle means more resources to create or strengthen specialized units, to create new tools for actors on the fields, and to ensure better gathering of data on environmental crimes. It also means creating a platform for exchanges of good practices and expertise between actors from different Member States. We cannot expect a good implementation of the ECD without allocating those resources in the first place.

The decision making on the EU priorities under EMPACT is taking place in the weeks to come and so it is more than urgent to act now to integrate environmental crimes into the priorities. The environmental crisis we are facing gives us no choice but to always move towards a stronger and better protection of the environment. As environmental crimes were counted as a priority in the previous policy cycle, the European Union cannot move backwards.

According to Eurobarometer, 94% of citizens in all EU Member States say that protecting the environment is important to them<sup>3</sup>. How can we consider that fighting criminal activities that destroy the environment is not a priority in that context?

We therefore urge you to consider our demand and include all forms of environmental crimes in your list of priorities for the next EMPACT Policy Cycle.

We stay at your disposal to discuss further this crucial issue,

Sincerely,

**MEP MARIE TOUSSAINT, *GREENS / EFA***

**MEP MARIA ARENA, *S&D***

**MEP MANON AUBRY, *GUE / NGL***

**MEP ELEONORA EVI, *GREENS / EFA***

**MEP ANJA HAZEKAMP, *GUE / NGL***

---

<sup>3</sup>[https://ec.europa.eu/commission/presscorner/detail/en/IP\\_20\\_331](https://ec.europa.eu/commission/presscorner/detail/en/IP_20_331)

**MEP MARTIN HOJSIK, *RENEW***

**MEP PETROS KOKKALIS, *GUE / NGL***

**MEP TILLY METZ, *GREENS / EFA***

**MEP GRACE O’SULLIVAN, *GREENS / EFA***

**MEP SIRPA PIETIKAINEN, *EPP***

**MEP FRANCO ROBERTI, *S&D***

**MEP CAROLINE ROOSE, *GREENS / EFA***

**MEP MICHAL WIEZIK, *EPP***

**BIRDLIFE EUROPE AND CENTRAL ASIA**

**EUROPEAN ENVIRONMENTAL BUREAU**

**HUMANE SOCIETY INTERNATIONAL – EUROPE**

**INTERNATIONAL FUND FOR ANIMAL WELFARE**

**ONE VOICE**

**TRAFFIC – WILDLIFE TRADE MONITORING**

**WILDLIFE CONSERVATION SOCIETY EU**

**WWF EUROPEAN POLICY OFFICE**