END WILDLIFE CRIME

THE CASE FOR AN ADDITIONAL PROTOCOL TO THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME ON CRIMES THAT AFFECT THE ENVIRONMENT

CRIMES THAT AFFECT THE ENVIRONMENT – AN EXISTENTIAL THREAT

Crimes that affect the environment (CAE) are among the most lucrative and destabilizing forms of transnational organized crime, estimated to generate hundreds of billions of dollars in criminal profits each year.[1] Once the loss of ecosystem services is counted, the full economic cost of illegal logging, fishing and wildlife trade alone can amount to between USD 1 to 2 trillion a year, with governments in source countries forgoing an estimated USD 7 to 12 billion in fiscal revenue annually.[2]

These crimes, which include illicit activities such as the trafficking of wild animals, plants and fungi, illegal mining and the trafficking of precious metals, illegal logging and the trafficking of timber, and the trafficking of waste, are a significant driver of ecosystem degradation and biodiversity loss globally. They accelerate climate change, push species to the brink of extinction, and threaten the livelihoods of Indigenous Peoples and local communities.

Beyond their impacts to the natural world, CAE converge and fuel other serious forms of organized crime, including corruption, money laundering, fraud, human and drugs trafficking. Illegally sourced commodities enter legitimate markets through false documentation and goods laundering, and their proceeds move through financial institutions and across borders. CAE are embedded along entire supply chains affecting source, transit, and destination countries. These are transnational crimes requiring a global response, yet there is at present no comprehensive global legal framework dedicated to address organized CAE.

WHY THE CURRENT INTERNATIONAL LEGAL FRAMEWORK FALLS SHORT

Despite the scale and transnational nature of CAE, the international legal response remains a fragmented patchwork of dozens of non-binding resolutions, declarations and statements. While existing multilateral environmental agreements (MEAs) contribute to global environmental governance, these instruments were not designed, nor mandated, to provide criminal justice frameworks to address CAE as transnational organized crimes. They do not provide for mutual legal assistance, joint investigations, the transfer of evidence or extradition. They were never designed to dismantle criminal networks, and they cannot do so.

The UNTOC provides precisely those tools. As the principal global agreement for tackling transnational organized crime, the UNTOC enables States to prevent, investigate and prosecute serious crime across borders through joint investigations, special investigative techniques, mutual legal assistance, asset recovery, the exchange of evidence and the extradition of suspects, including where bilateral treaties do not exist between the States concerned.

CAE, however, do not automatically fall within the UNTOC's scope. In practice, each State must legislate individually to define CAE offences as "serious crimes" under the Convention,[3] or negotiate bilateral

[1] OECD Trade and Environment Working Papers 2023/02, The nexus between illegal trade and environmental crime (July 2023).

[2] World Bank Group, Illegal Logging, Fishing and Wildlife Trade: The Costs and How to Combat It (October 2019).

[3] The UNTOC defines 'serious crime' as "conduct constituting an offence punishable by a maximum deprivation of liberty of at least four years or a more serious penalty". CAE only fall under the scope of application of the UNTOC

agreements one State at a time. Coordinating that effectively across a global criminal market is a near-impossible task, and the result is often fragmented or ineffective international cooperation: evidence cannot be transferred when needed, the absence of dual criminality hinders extradition, and law enforcement and financial investigations stall at the border while networks move on.

Effectively preventing and combatting CAE requires a coordinated legal framework, one that is commensurate with the scale and sophistication of the threat.

WHAT A PROTOCOL TO THE UNTOC CAN DELIVER

The UNTOC was intended to be an evolving instrument, providing for the adoption of supplementing protocols capable of addressing emerging forms of organized crime. The existing protocols demonstrate how a dedicated international legal framework can establish minimum common standards, encourage legislative harmonization, and support national implementation.

A Protocol on CAE will provide investigators, prosecutors and financial intelligence units a dedicated and predictable legal basis for effective judicial and law enforcement cooperation. It will build on the UNTOC's existing architecture that States already know and apply, and draw upon the existing capacity and support mechanisms available through the UN Office on Drugs and Crime. A Protocol will:

Establish harmonized criminalization of the main types of CAE globally, aligning national legal frameworks around common minimum standards and definitions, and reducing opportunities for criminal networks to exploit regulatory loopholes.

Extend the application of UNTOC tools to CAE, which currently fall outside the scope of the Convention. This would strengthen international cooperation and enable joint investigations, coordinated prosecutions, and the use of special investigative techniques. It would also facilitate the application of dual criminality requirements including extradition of suspects and transfer of evidence.

Enable financial disruption of criminal networks by recognizing CAE as predicate offences for money laundering, extending established tools for tracing proceeds, freezing assets and recovering the profits that make these crimes attractive.

Close gaps in the international legal framework, including by criminalizing the import of any natural resource, such as wildlife or precious metals, that were acquired in contravention of the domestic legislation of the source countries.

Place CAE in the same level of seriousness as drug trafficking, firearms trafficking, corruption and human trafficking, each of which already benefits from an international cooperation framework, while CAE do not. This would promote political will to address CAE as a priority issue, and lead to increased resource allocation within national criminal justice systems.

ADDRESSING COMMON CONCERNS

Some States have so far reserved their position on developing a Protocol on CAE. Some of the most common concerns are addressed below.

On scope and sovereignty. Negotiations will only address offences that fall within the UNTOC's scope: crimes that are transnational in nature and involve an organized criminal group. Supporting the Resolution

if they are classified as serious crimes and where the offence is transnational in nature and involves an organized criminal group.

will open negotiations; it commits no State to a predetermined Protocol text, and its form remains for States to determine.

On implementation of existing frameworks. While better implementation of the UNTOC in cases involving CAE will be an essential short- and medium-term measure, its impact will remain limited while criminalization and penalties or CAE offences continues to significantly differ between jurisdictions.

On encroachment on the mandates of MEAs. There are no MEAs that have the infrastructure, mandate or resources required to tackle CAE, as they were not designed nor intended to tackle organized crime. An UNTOC Protocol will support the objectives of MEAs that are currently undermined by transnational, organized CAE.

On legitimate industry. A Protocol will target organized criminal networks, not lawful enterprise. Its purpose will be to distinguish legitimate operators from criminal ones, which will help level the global playing field for economic actors that comply with environmental and labor standards.

THE BEST OPPORTUNITY IN DECADES: THE 13TH CONFERENCE OF THE PARTIES, OCTOBER 2026

At the 13th Conference of the Parties (CoP13) to the UNTOC, from 19 to 23 October 2026, States will consider a resolution that will call for the launch of a negotiating process for an UNTOC Protocol on CAE. The scope of the Resolution will be limited to four modalities of CAE, namely illicit trafficking in wild fauna and flora, including timber and timber products, illegal mining of and illicit trafficking in minerals and precious metals, and illicit trafficking in waste.

This effort is led by Brazil, which in November 2025 launched the Coalition for Multilateral Action Against Crimes that Affect the Environment, with the aim to mobilize support for the establishment of a legally binding agreement under the UNTOC. As of July 2026, the Coalition counts with 25 State members,[4] as well as 14 civil society members, including the Global Initiative to End Wildlife Crime.

CAE threaten the economic and environmental security of every State. We encourage all States to support the Resolution at the UNTOC COP13 in October. Supporting this proposal will show comity among Nations, and especially by enforcement officers and those on the frontlines of combating these highly destructive crimes that threaten our shared natural environment.

ABOUT THE GLOBAL INITIATIVE TO END WILDLIFE CRIME

The Global Initiative to End Wildlife Crime was launched in 2020, with the aim to support States to close serious gaps in the international legal framework to prevent and combat wildlife trafficking, and have now grown to a network of over 60 organizations from across the globe. It is chaired by former Secretary General of CITES John E Scanlon AO and includes a global network of experts.

[4] State members of the Coalition as of 28 July 2026: Angola, Bolivia, Brazil, Central African Republic, China, Colombia, Costa Rica, Democratic Republic of Congo, Ecuador, El Salvador, France, Gabon, Guinea Bissau, Mauritania, Morocco, Nigeria, Panama, Peru, Republic of the Congo, São Tome and Príncipe, South Africa, Spain, Suriname, Uganda and Zambia