

**MONEY TALKS:
THE CROOKED CONNECTION
BETWEEN CORRUPTION
AND ILLICIT TRADE**

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ABOUT TRACIT

The Transnational Alliance to Combat Illicit Trade (TRACIT) is an independent, private sector initiative to drive change to mitigate the economic and social damages of illicit trade by strengthening government enforcement mechanisms and mobilizing businesses across industry sectors most impacted by illicit trade.

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ABBREVIATIONS AND ACRONYMS

| | |
|----------|--|
| AIRCOP | Airport Communication Project |
| CBP | U.S. Customs and Border Protection |
| CITES | The Convention on International Trade in Endangered Species of Wild Fauna and Flora |
| CPI | Transparency International's Corruption Perception Index |
| DHS | U.S. Department of Homeland Security |
| DPP | South Africa's Director of Public Prosecutions |
| EIA | Environmental Investigation Agency |
| EIU | The Economist Intelligence Unit |
| EMA | Economically-motivated adulteration |
| FAO | Food and Agriculture Organization of the United Nations |
| FATF | Financial Action Task Force |
| FCOs | Fishery Control Officers |
| FDA | Food and Drug Administration |
| FTZ | Free Trade Zone |
| GDP | Gross Domestic Product |
| GIABA | The Inter-Governmental Action Group against Money Laundering in West Africa established by the Economic Community of West African States |
| ICE | U.S. Immigration and Customs Enforcement |
| ILO | International Labour Organization |
| INTERPOL | The International Criminal Police Organization |
| IPR | Intellectual Property Rights |
| IUFRO | International Union of Forest Research Organizations |
| IUU | Illegal, Unreported and Unregulated |
| IWT | Illegal Wildlife Trade |
| MAFF | Cambodia's Ministry of Agriculture, Forestry and Fisheries |
| MPA | Marine protected area |
| Norad | Norwegian Agency for Development Cooperation |
| NYC | New York City |
| NYPD | New York City Police Department |
| OAS | The Organization of American States |
| OECD | Organisation for Economic Co-operation and Development |
| OLAF | The European Anti-Fraud Office |
| OSCE | Organization for Security and Co-operation in Europe |

| | |
|--------|---|
| RFMOs | Regional fisheries management organizations |
| SDGs | United Nations Sustainable Development Goals |
| SOPs | Standing operating procedures |
| TIP | Trafficking in Persons |
| TRACIT | Transnational Alliance to Combat Illicit Trade |
| UNCAC | United Nations Convention Against Corruption |
| UNCTAD | United Nations Conference on Trade and Development |
| UNEP | United Nations Environment Programme |
| UNODC | United Nations Office on Drugs and Crime |
| UNICRI | United Nations Interregional Crime and Justice Research Institute |
| UNTOC | United Nations Convention against Transnational Organized Crime |
| USAID | United States Agency for International Development |
| WCO | World Customs Organization |
| WEF | World Economic Forum |
| WHO | World Health Organization |
| WTO | World Trade Organization |
| WWF | World Wildlife Fund |
| ZAWA | Zambia Wildlife Authority |

EXECUTIVE SUMMARY

Understanding the imperative to combat illicit trade

Illicit trade has emerged as a major policy and regulatory challenge worldwide. It encompasses a wide spectrum of illegal activities, conducted both offline and online, including narcotics and arms trafficking, environmental and wildlife crime, intellectual property theft, and robbery and resale of antiques and cultural artifacts. Illicit traders also exploit a wide range of industries, most notably including pharmaceuticals, consumer goods, tobacco, alcohol, entertainment content, oil products, fish, timber, food, precious metals and gemstones, pesticides, and thousands of products vulnerable to trademark counterfeiting and copyright piracy.

Collectively across these sectors, illicit trade creates a vast underground economy estimated to account for 8 to 15 percent of global GDP, according to the World Economic Forum (WEF).¹ Such a significant diversion of commercial activity presents considerable negative consequences to the global economy. The United Nations Conference on Trade and Development (UNCTAD) notably recognizes that illicit trade crowds out legitimate economic activity and deprives governments of revenues for investment in vital public services.²

Illicit trade also presents a direct threat to security and stability. The links between illicit trade and organized crime are well-established. The involvement of members of criminal syndicates has been observed in virtually all global trading sectors, provoking violence, undermining the rule of law, breeding corruption and financing terrorism.³ These findings are echoed by the US Department of Homeland Security (DHS), which found that illicit goods trafficked to American consumers threaten U.S. national security.⁴

Investigating corruption as a facilitator of illicit trade

There are few public policy challenges more intractable than eliminating corruption. In the absence of sufficient accountability and transparency, the motives of corrupt actors can eclipse policy prescriptions intended to maintain integrity in public sector transactions.

If power tends to corrupt and absolute power corrupts absolutely, then preventing corruption will require extraordinary controls and the subsequent and consistent application of these controls from the lowest to highest levels of governance.

This report uniquely confronts corruption by targeting the incentives that motivate it as a facilitator of illicit trade. By revealing unambiguous acts of corruption occurring in specific economic transactions vulnerable to illicit trade, a typology of trade-related corruption can be established as a basis for purposeful policy and legislative remedies.

Among the key findings in the report are that (i) corruption is emergent in every economic sector where illicit trade occurs and (ii) corrupt actions are often common across sectors such that corruption in one sector is emulated in other sectors. Taken together, this suggests that once a criminal identifies a weakness – such as a Customs official accepting a bribe to overlook human or narcotics trafficking – the same or connected smugglers may exploit the same corrupt officer to facilitate the transit of counterfeits or illegally traded wildlife.

The identification of the types and common patterns of corruption can also be of value to lawmakers, enabling them to design more effective corruption control mechanisms where needed. For this reason, the report presents a set of policy recommendations aimed at facilitating an effective response to corruption in the context of illicit trade. These recommendations provide a “checklist” of fundamental measures that governments are encouraged to implement to improve their ability to defend against the wider societal harms of illicit trade, with a particular emphasis on addressing the enabling role of corruption in perpetuating illicit supply chains.

Explaining where and how corruption facilitates illicit trade

Corruption is generally defined as the abuse of entrusted power for private gain. It includes bribery, abuse of functions, trading in influence, illicit enrichment and embezzlement of public funds, resulting in undue advantage. Corruption is one of the key underlying conditions that increases vulnerability to illicit trade. It can occur at virtually any stage in the supply chain and with virtually any actor along the way: border control, law enforcement, the judiciary, regulatory agencies, financial markets and transportation networks. This report focuses on the impact and effects of corruption and where it is encountered during illicit trading, including:

- In interactions with intermediaries such as transporters, customs, and border agents to facilitate the movement of illicit goods.
- To ensure law enforcement officials overlook illegal factories that manufacture counterfeit or sub-standard goods.
- In the process of fraudulently obtaining permits and licenses, to exceed quotas, or in the course of regulatory inspections.
- To overlook illegal shipments.
- To prevent arrests (e.g., by leaking information about an impending police raid) or release suspects.
- To help evidence disappear in the course of criminal proceedings, delay or drop prosecutions, or to return acquittals for those who are brought to justice.

Documenting corruption in illicit operations

Section III delineates examples of corruption as it occurs in specific sectors vulnerable to illicit trade. It shows overarching trends and specific cases that illustrate the manifestation of corruption in illicit trade in agrifoods, alcohol, fishing, forced labor, logging, wildlife, pharmaceuticals, pesticides, precious metals and gemstones, tobacco products, petroleum, and consumer products vulnerable to counterfeiting and piracy.

- **Illicit trade in agri-foods.** Bribery of regulators and the assistance of corrupt public officials in placing illicit products in the market endangers food supplies, threatens the viability of legitimate food suppliers, and can have wide-ranging consequences that go beyond a specific country's borders.
- **Illicit alcohol.** Regulations designed to mitigate illicit alcohol trade are often rendered ineffective by corruption. Bribery is particularly common and it can occur in all parts of the supply chain, undermining countries' efforts to prevent smuggling and ensure effective enforcement of alcohol regulations.
- **Illegal, Unregulated and Underreported (IUU) fishing.** Corruption is increasingly recognized as a major challenge for the sustainable management of fisheries. In IUU fishing, this includes officials taking bribes to issue licenses or to verify forged fishing licenses. The United Nations Office on Drugs and Crime (UNODC) states that "corruption enables fisheries crimes to occur at every stage of the value chain, and almost without exception results in significant losses of revenue for the country in question."⁵
- **Forced labor, child labor and human trafficking.** Experts argue that human trafficking could not occur on the scale that it does if it were not for the complicity and collusion of corrupt officials with criminal gangs.⁶ Conversely, research shows that if human trafficking is to be significantly reduced, then corruption must be curbed.
- **Illegal logging and illicit trade in timber.** One of the main reasons illegal logging continues in many parts of the world is because corruption enables criminals to operate with impunity. Reports from INTERPOL and United Nations Environment Programme (UNEP) show that corruption is entrenched in illegal logging operations. The link to corruption is so prevalent in the forestry sector that Interpol attributes USD 29 billion to criminal networks bribing officials to establish "safe passage" for the illegal movement of timber. Criminal groups also frequently exploit the same routes to transport other illicit goods, such as drugs and firearms.⁷
- **Illicit trade in wildlife.** Corruption has emerged as a clear facilitator of the illegal trade in wildlife. In jurisdictions where corruption is pervasive, bribery ensures that traffickers build informal relations with public officials and ensure the illicit sourcing, transfer and sale of wildlife and products, as well as the laundering of the proceeds from the illegal wildlife trade. The Organisation for Economic Co-operation and Development (OECD) reports that offenders reduce their exposure to the risk of being caught by bribing their way out of arrests, investigations, prosecution and convictions, and argues that illegal wildlife trade could not take place on a global scale without corruption.⁸

- **Illicit trade in pharmaceuticals.** According to the *Committee on Understanding the Global Public Health Implications of Substandard, Falsified, and Counterfeit Medical Products*, corruption is a key enabler of the manufacture, trade, and distribution of falsified medicines.⁹ Bribery is critical for unwarranted product approvals, overlooking compliance and even to delay product approvals of competitors. In West Africa, it is understood that corruption within the supervisory, control and enforcement agencies is the fundamental problem impeding efforts to stop counterfeiting.¹⁰
- **Trade in illegal pesticides.** Corruption plays a role in all stages of the illegal pesticides trading cycle, involving a wide range of actors from regulators offering illegitimate licenses to customs officials who allow illegal products to cross borders. UNEP highlights that corruption and lax enforcement – often coupled with relabeling – allow for the return of seized stocks of illicit pesticides to the market.¹¹ This observation is echoed by the United Nations Interregional Crime and Justice Research Institute (UNICRI) and the Organization for Security and Co-operation in Europe (OSCE) in reporting that illicit traders in pesticides often rely on corrupt custom officers, law enforcement officials and staff in charge of pesticide procurement to carry out their crimes.¹²
- **Illicit trade in precious metals and gemstones.** The presence of criminal groups in the mining and minerals sector drives corruption and negatively impacts stability, governance, development and the rule of law. Corruption in this sector includes everything from customs officials facilitating cross-border smuggling to corrupt officials enabling the distribution of illegal export and mining licenses. This illicit trade not only fuels conflict across Africa but also finances armed groups, encourages forced labor, and leads to widespread human rights abuses. Additionally, the vast profits generated from this trade provide ample opportunities for money laundering and corruption.¹³
- **Illicit trade in tobacco products.** The pervasiveness of illicit tobacco trade is largely attributable to weak governance, poor government commitment to combatting illicit tobacco, and ineffective customs and tax administrations. However, corruption stands out as a fundamental element and facilitator of the illicit trade in tobacco products. It can encompass bribes to customs officials to permit the cross-border movement of smuggled cigarettes, bribes to law enforcement officials to allow the operation of an illegal manufacturing facility (e.g., through the tip-off of raids), and can play a role in the process of obtaining permits and licenses from national authorities or issuing clearance documents.
- **Illicit trade in petroleum.** The petroleum sector is particularly susceptible to integrity violations due to the high complexity of related supply chains, the close interaction between the public and private sectors, and the vast sums of money generated. By some estimates, more than 57 percent of all fraud cases in the oil and gas sector relate to corruption schemes.¹⁴

- **Counterfeiting and piracy.** According to the UNODC, corruption is inherently linked to the illicit trafficking of counterfeit goods, especially when these are shipped internationally.¹⁵ The significance of corruption as a facilitator is echoed by the OECD, stating that “high levels of corruption and gaps in intellectual property rights enforcement [...] are the crucial factor for trade in fakes.”¹⁶ Furthermore, criminal networks use bribery or extortion of government officials to reduce disruptions in their illicit distribution channels and risks of punishment. Corruption can manifest itself in myriad ways, with the most common being to bribe Customs officials to ensure that counterfeit goods avoid inspection, to bribe law enforcement officers to provide advance notice of raids and protection during investigations, and finally as a means to derail the criminal justice phase once a crime has been uncovered.

Policy recommendations

Based on the findings of this report, TRACIT has formulated a set of policy recommendations to promote a more intensive focus on eliminating corruption as a leading solution to stop illicit trade.

These recommendations provide a “checklist” of fundamental measures that governments are encouraged to implement to improve their ability to defend against the wider societal harms of illicit trade, with a particular emphasis on addressing the enabling role of corruption in perpetuating illicit supply chains.

Treaties, laws and policies

- **Enforce the provisions of existing international legal instruments addressing both corruption and illicit trade.** International treaties are a source of guidelines and legally-binding standards to drive national action and international cooperation. Consequently, governments are urged to ratify, adopt and enforce the provisions of existing anti-corruption treaties, including notably: (i) OECD’s instruments on integrity and corruption, (ii) the UN Convention against Corruption, and (iii) the recommendations of the Financial Action Task Force (FATF), especially in relation to actions aimed at preventing the laundering of proceeds of corruption and confiscating those proceeds. Countries should also ensure maximum support for, and engage proactively within, such peer review initiatives as the Inter-governmental Review Mechanisms for the UN Convention Against Corruption. Intergovernmental organizations active in the anti-corruption and illicit trade spaces could consider developing a multi-stakeholder action plan on corruption in illicit trade, taking into consideration existing government regulations and enforcement efforts, initiatives from the business community, and input from civil society stakeholders.
- **Effectively leverage domestic criminal justice systems to tackle corruption.** On-the-ground anti-corruption capacities urgently need to be strengthened. Furthermore, crimes associated with corruption and illicit trade related offences should be criminalized and be listed as serious crimes under domestic law. Clear prosecutorial and sentencing guidelines need to be established that emphasize the grave nature of these offences.

- **Adopt and enforce robust agency-specific measures to uphold transparency, integrity and ethical conduct.** An anti-corruption regime that mitigates abuses of position and sets clear rules and administrative procedures to mitigate and reduce incentives to engage in corrupt behavior is essential – both at-large and in relation to illicit trade. The following are key actions that should be considered by individual agencies to enhance transparency and integrity in their operations:
 - To the extent possible, streamline and automate permit and licensing processes and controls.
 - Strengthen prevention by implementing and enforcing strong codes of conduct and regulating matters related to conflict of interests and asset declarations for public officials.
 - Invest resources around the concept of continuous, career-long training on ethical conduct for public officials.
 - Ensure a robust reporting system of wrong-doing and provide adequate protections for whistleblowers against all forms of retaliation.
 - Establish and ensure the proper functioning and independence of agency-specific units in charge of internal investigations for breaches of codes of conduct.
 - Set up specific criteria and procedures for the selection, training and vetting of candidates wishing to join public agencies vulnerable to corruption and illicit trade.
 - Establish clear case management and standing operating procedures (SOPs) to reduce agencies' vulnerability to corruption and other forms of integrity-related misconduct.

Implementation and enforcement

- **Elevate the importance of combatting illicit trade.** Combating illicit trade will require stronger controls to prevent corruption. This will require governments to approach corruption and illicit trade more holistically, with an all-of-government approach. It will also require governments to elevate punitive damages associated with the crimes of illicit trade and the crimes of corruption.
- **Include anti-illicit trade policies as integral components of national plans to combat corruption.** As corruption and illicit trade related offences are mutually reinforcing, governments should proactively include illicit trade controls into the anti-corruption policy sphere.
- **Implement cross-cutting operational approaches to fighting corruption and illicit trade.** With the objective to maximize the public welfare benefits of reduced illicit trade, governments should pursue cross-cutting approaches to fighting corruption as it occurs in illicit trade. This starts with establishing a national-level joint task force that would convene anti-illicit trade and anti-corruption experts, build cooperation with the private sector to help expose corruption in illicit supply chains, and shift the risk-versus-reward to an increased likelihood that crimes of corruption and illicit trading will face swift prosecution and heavy deterrent penalties.

- **Ensure a strong customs environment.** Customs and other border control agencies have a critically important role in combating cross-border illicit trade, largely because their officers have front-line responsibility for conducting inspections and detecting and seizing illicit goods. However, this level of authority creates ample opportunities for corruption that merit targeted anti-corruption controls.
- **Take proactive measures to prevent illicit trade and corrupt practices in Free Trade Zones.** Free Trade Zones (FTZs) have emerged as a notorious vulnerability in the global supply chain, enabling the facilitation of illicit trade in many sectors. Greater supervision over zone operators can prevent acts of corruption that impede inspections of shipments into and out of FTZs or cover up illicit goods stored and services conducted in zones.

Supporting environment

- **Support and protect a free press.** A free and independent press plays a crucial role in detecting and exposing instances of corruption and illicit trade, thereby increasing transparency and accountability of public officials and fighting against impunity. Governments should ensure that journalists are free to report on cases of corruption and illicit trade without fear of retaliation or censorship. To this end, governments should ensure laws protecting freedom of the press, including whistleblower protections and laws allowing journalists to protect their sources.

Conclusions

The objective of this report is to strengthen capabilities to combat illicit trade by demonstrating that corruption is a significant factor in the facilitation of illicit trade. It presents correlations between corruption, criminal activity and government policies to mitigate illicit trade, categorizes specific types of corruption that occur in illicit trade, and delineates trends and specific cases that illustrate the manifestation of corruption in illicit trade across multiple sectors including agrifoods, alcohol, fishing, forced labor, logging, wildlife, pharmaceuticals, pesticides, precious metals and gemstones, tobacco products, petroleum, and consumer products vulnerable to counterfeiting and piracy.

There is a deep intersection between corruption and illicit trade, with a long typology of corrupt actions emerging as primary facilitators of illicit trade. Moreover, it is evident that no sector vulnerable to illicit trade is immune from the effects of corruption, especially where there are readily available profits to be made, enabling criminal schemes to remain undetected across borders, and helping offenders evade the consequences of illicit trade.

As long as illicit trade persists as a significant part of global commerce, it will be critical to fortify policies and controls to prevent corruption and corrupt actors from compromising the integrity of the global supply chain.

I. INTRODUCTION

Understanding the crime of corruption

While this report investigates corruption as a primary facilitator of illicit trade, in the broader view corruption is among the most villainous of crimes, generating negative externalities that sweep across all socio-economic communities.

In the words of the World Trade Organization (WTO), “corruption corrodes the moral and economic fabric of society” as it “undermines values and value systems and erodes trust in public institutions and the notion of a fair social contract.”¹⁷ When it comes to commerce, corruption threatens the livelihood of legal enterprises when they are forced to compete against corrupt companies that gain advantages through bribery.¹⁸ At its worst, corruption precludes honest companies from entering a market or ensures the continued existence of a monopoly or oligopoly situation.¹⁹

On the public side of the ledger, corruption misallocates limited resources intended for public services, infrastructure, and other investments in society, while at the same time raising the costs for legitimate businesses to compete. It hampers economic growth and development and pushes the achievement of the UN Sustainable Development Goals (SDGs) further away. This is especially true in emerging economies that have higher levels of corruption than developed countries,²⁰ as high levels of corruption can inhibit foreign investment, mitigating economic growth and prospects for prosperity.²¹

“The incidence of corruption varies enormously among different societies, ranging from rare to widespread to systemic. If it is rare, it may be relatively easy to detect, punish, and isolate. Once it becomes systemic, however, the likelihood of detection and punishment decreases, and incentives are created for corruption to increase further. This pattern of an initially rising, but then falling, cost of engaging in corrupt acts can lead to multiple equilibriums: one holding in a society relatively free of corruption, the other holding in a society where corruption is endemic.”²²

Understanding illicit trade

This report primarily investigates corruption as it relates to illicit traders who violate a wide spectrum of laws – such as border crossing, taxes, online listings, environmental controls and labor laws. To understand how corruption facilitates illicit trade, it is therefore critical to understand that illicit trade can be any practice or conduct prohibited by the law relating to the production, assembly, shipment, receipt, possession, distribution, sale or purchase of goods or services.

Some goods traded illicitly may be intrinsically *legal*, such as genuine tobacco products and alcoholic beverages, but they may have been manufactured or traded (i.e., smuggled across borders) in contravention of tax laws, health, safety, and security regulations. By contrast, other goods may be intrinsically *illegal*. This is the case, for example, of fraudulent medicines produced with a different formula than that which is advertised, narcotics, or trade in endangered or protected species.

On the commercial side, illicit trade occurs across a wide range of industries: pharmaceuticals, consumer goods, tobacco, alcohol, entertainment content, petroleum products, fishing, forestry, agri-foods, diamonds, pesticides and thousands of products vulnerable to trademark counterfeiting and copyright piracy.

According to TRACIT estimates, illicit trade can account for up to USD 3 trillion in annual losses to the global economy (see table 1). Taken together with associated transnational criminal activities, WEF has calculated it to account for an estimated 8 to 15 percent of global GDP.²³ In some developing countries where resource endowments are vulnerable to illicit trade, the percentages can be much higher.

Table 1: Size of illicit trade sectors

| ILLICIT TRADE SECTORS | LOW RANGE (USD BILLION) | HIGH RANGE (USD BILLION) |
|--|---------------------------|---------------------------|
| AGRI-FOOD | 30 | 50 |
| AGROCHEMICALS AND PESTICIDES | 8 | 20 |
| ALCOHOL | 19 | 19 |
| COUNTERFEIT AND PIRATED GOODS | 509 | 1900 |
| FORESTRY PRODUCTS | 51 | 152 |
| ILLEGAL, UNDERREPORTED AND UNREGULATED FISHING | 26 | 50 |
| PETROLEUM PRODUCTS | 133 | 133 |
| PHARMACEUTICALS | 4 | 432 |
| PRECIOUS METALS AND GEMSTONES | 48 | 48 |
| TOBACCO PRODUCTS | 41 | 50 |
| TRAFFICKING IN PERSONS | 150 | 150 |
| WILDLIFE | 7 | 23 |
| TOTAL | USD 1.026 Trillion | USD 3.027 Trillion |

Source: TRACIT. (2022). *Examining the negative impacts of illicit trade on SDG 8*. New York: Transnational Alliance to Combat Illicit Trade.

Despite the significant magnitude of these estimates, they may in fact be low as high levels of corruption in branches of government closely linked to the dynamics of illicit trade – including customs, border patrol, and law enforcement – undermine collection of data needed to understand the true extent of the problem.”²⁴

Notably, it is useful to point out that some of the main drivers of illicit trade encourage corruption. For example:

- **High profits.** The primary motivation for traffickers to engage in illicit trade is the substantial, undocumented, largely cash profits. These circumstances provide incentives for criminal activity and ample supplies of money that can be used for bribes.
- **Low risks of detection.** Illicit traders minimize the risk of detection by intentionally concealing or mis-declaring shipments to evade border controls. Accomplishing such circumvention of laws usually creates a demand for corrupt actions by government officials to ensure the crimes remain undetected and under the radar of law enforcement action.

Defining the different forms of corruption

Corruption is generally defined as the “abuse of entrusted power for private gain.”²⁵ It takes many forms and the categories delineated in this section are most relevant in the context of illicit trade:

Bribery

The most common form of corruption reported is bribery. Bribery occurs in developed and developing economies and across all commercial sectors. It is so ubiquitous, that the UN has estimated that it could be equivalent to more than 5 percent of global GDP.²⁶ The UN Convention Against Corruption (UNCAC) defines bribery as:

- (a) *The promise, offering or giving, to a public official, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties;*
- (b) *The solicitation or acceptance by a public official, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties.*²⁷

In light of the above, bribery can be initiated by a corrupting agent or be solicited by a public official, in both cases altering that official’s performance of duty. Notably, refraining from acting, is all too common, where bribes encourage officials to look the other way for example to allow illicit goods to cross borders.

Abuse of functions

Abuse of functions is defined as “the performance of or failure to perform an act, in violation of laws, by a public official in the discharge of his or her functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity.”²⁸ This could include failing to follow up on reports of criminal acts in exchange for an undue advantage that the public official would not have otherwise received.

Trading in influence

Trading in influence is another form of corruption where the public official is offered or solicits an undue advantage in exchange for abusing his or her influence to benefit a third party. For example, a public official could be offered a share in a criminal enterprise in exchange for influencing colleagues to approve permits or issue licenses to illicit traders.

Trading in influence is defined by UNCAC as:²⁹

- a) *“The promise, offering or giving to a public official or any other person, directly or indirectly, of an undue advantage in order that the public official or the person abuse his or her real or supposed influence with a view to obtaining from an administration or public authority of the State Party an undue advantage for the original instigator of the act or for any other person;*
- b) *The solicitation or acceptance by a public official or any other person, directly or indirectly, of an undue advantage for himself or herself or for another person in order that the public official or the person abuse his or her real or supposed influence with a view to obtaining from an administration or public authority of the State Party an undue advantage.”*

Illicit enrichment

Where bribery is a quid pro quo exchange of undue advantage in compensation for public abuse of position or power, illicit enrichment is defined as “a significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income.”³⁰

Embezzlement

Embezzlement is a form of corruption where a public official steals something of value that was entrusted to that public official because of the role that the official holds. This is either done for the benefit of that public official or for someone else. UNCAC defines this type of corruption as the “embezzlement, misappropriation or other diversion by a public official for his or her benefit or for the benefit of another person or entity, of any property, public or private funds or securities or any other thing of value entrusted to the public official by virtue of his or her position.”³¹

II. THE CROOKED CONNECTION BETWEEN CORRUPTION AND ILLICIT TRADE

One of the key underlying conditions that increases vulnerability to illicit trade is corruption, which can occur at virtually any stage in the supply chain and with virtually any actor along the way: border control, law enforcement, the judiciary, regulatory agencies, financial markets and transportation networks.

This report focuses on the impact and effects of corruption on the facilitation of illicit trade, ranging from the role that public sector officials play in ensuring that these crimes remain under the radar to severely undermining efforts to combat it. It can also have far-reaching societal impacts on public policy and the rule of law at large.

Corruption in illicit trade

The links between illicit trade and criminal activity are well established, from human trafficking and tobacco smuggling to the involvement of mafia-style organizations in the trade of counterfeit goods. Corruption underpins the criminal nature of illicit trade, both in facilitating it and undermining the ability to curb it.³²

Corruption at the border works as an amplifier of the threat and incidence of illicit trade, as corruption can pave the way for illegal trading practices through collusion between illicit traders and government officials.³³ According to the World Customs Organization (WCO), customs authorities are particularly susceptible to corruption since there can be low levels of supervision and accountability over their control and discretion across border transactions; and this situation is exacerbated by the sheer volume and complexity of regulatory frameworks.³⁴

However, Customs are far from the only government agency plagued by corruption. For example, national park staff, enforcement officers and politicians have all been implicated for corruption related to poaching and other wildlife crimes.³⁵ More often than not, the incidence of corruption is higher in countries with low levels of law enforcement or where there is political instability.³⁶

Corruption is encountered during illicit trading in a wide variety of ways:

- In interactions with intermediaries such as transporters, customs, and border agents to facilitate the movement of illicit goods;
 - In Costa Rica, 20 police officers assisted a criminal network to circumvent border checkpoints for smuggling contraband alcohol.³⁷
 - In China and Tanzania, naval officers accepted bribes to transport ivory shipments across borders without inspection.³⁸
 - In Tanzania, government officials are involved in the smuggling of tanzanite through border points and routes.³⁹

- In Tanzania, the minister and top officials at the Wildlife Department were fired for taking bribes for arranging for protected animals to be smuggled to Qatar.⁴⁰
- To ensure local law enforcement officials to overlook illegal factories that manufacture counterfeit or sub-standard goods;
 - In Italy, a counterfeiter tried to bribe authorities after a search uncovered a counterfeit manufacturing facility and 140,000 counterfeit items in the shop.⁴¹
- In the process of fraudulently obtaining permits and licenses, to exceed quotas, or in the course of regulatory inspections;
 - In IUU fishing, officials have been documented in taking bribes to issue licenses or to verify forged fishing licenses; and port officials have allowed corrupt actors to import mislabeled species to evade higher tax rates.⁴²
 - In wildlife crime, multiple cases have been reported on government employees stealing blank CITES documents that they then sell to unscrupulous wildlife traders.⁴³
 - In Brazil, the world's largest poultry exporter and the world's largest meat packer bribed regulators to loosen oversight by ignoring the adulteration or expiration of processed foods.⁴⁴
 - Japanese companies paid millions in bribes to Russian fisheries officials to exceed fishing quotas.⁴⁵
 - In Ukraine, officials from the State Fisheries Agency extorted monthly bribes and took a cut of the profits from illegal fishers in exchange for allowing them to overfish and catch restricted species, including beluga sturgeon.⁴⁶
 - In Indonesia, a member of the Indonesian parliament was sentenced to eight years in prison for accepting bribes to allow the conversion of protected forest zones.⁴⁷
- To overlook illegal shipments;
 - In Nigeria, oil company employees are bribed to allow unauthorized vessels to load oil and to allow authorized vessels to be filled with oil beyond their stated capacity.⁴⁸
- To prevent arrests or release suspects;⁴⁹
 - In South Africa, a rhinoceros horn syndicate bribed a National Park official to avoid arrest after hunting and dehorning rhinoceros.⁵⁰
- To help evidence disappear during prosecutions, delay or drop prosecutions,⁵¹ or to return no convictions in the cases of those who are brought to trial,⁵²
 - In the Philippines, a corrupt judge conferred with the suspects in a trafficking-in-persons case after the trafficked girls were threatened and coerced into signing a retraction of their complaint.⁵³

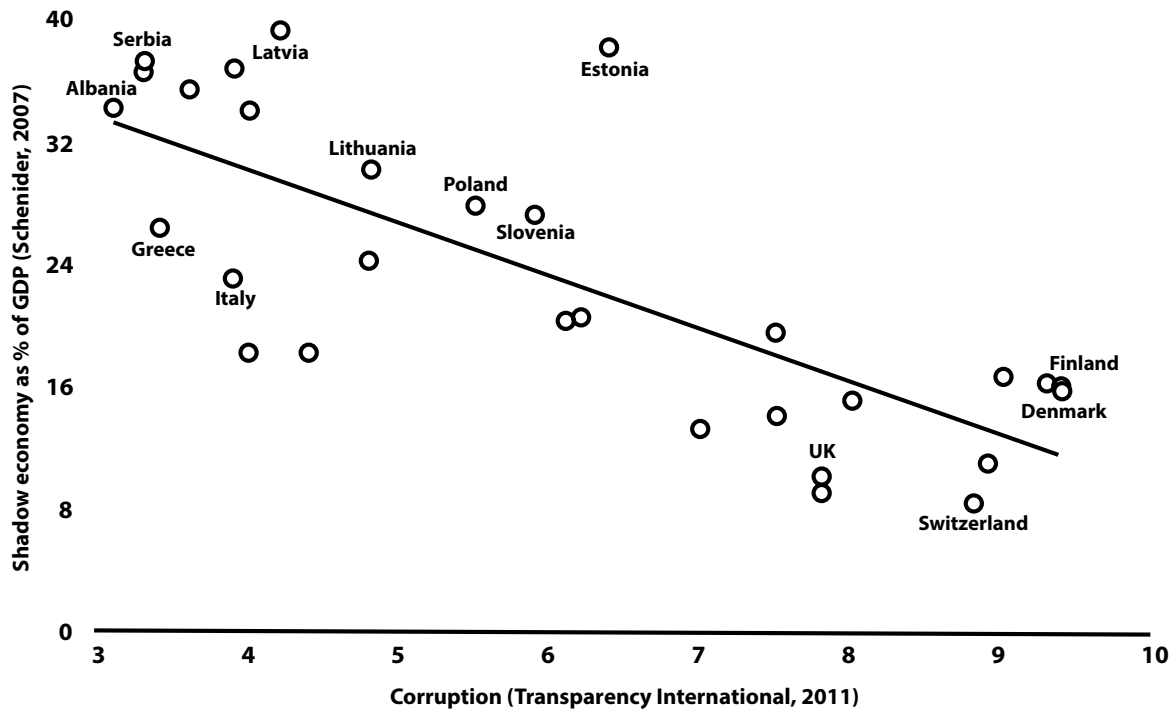
- As abuse of functions;
 - In Madagascar, checkpoint officials extorted tolls from transporters instead of confiscating banned ebony and rosewood.⁵⁴
 - In Thailand, two police officers and a senior Ministry of Justice official attempted to escort two civilians carrying rhino horns through customs inspections. Once questioned by Customs, the senior Thai official “insisted that the bags contained wine and that they should not be inspected”, and then attempted to bribe the customs officials.⁵⁵
 - In Thailand, fuel smugglers bribe “customs officials to turn a blind eye to contraband fuel in return for a share in the resulting profits”,⁵⁶ with similar incentives offered to officials at border checkpoints.⁵⁷
 - In Zambia, Ministry of Health officials launched a limited bidding process and awarded an unregistered company a major public contract for health kits that were unsafe and of poor quality.⁵⁸
- As embezzlement.
 - In Uganda, it has been reported confiscated goods are sold by law enforcement officials for their own private gain.⁵⁹
 - In Nigeria, state oil company officials have embezzled oil revenue.⁶⁰

Corruption broadly can also affect government policy making and legislative processes, which can further facilitate illicit trade. This could include an oversight or coordinating anti-illicit trade agency rendered ineffective as a result of illegal favors promised to high level public officials when the body – from its inception – is set up without independence and/or an adequate budget to perform its tasks.

Demonstrating the correlation between corruption and illicit trade

Evidence of the relationship between corruption and illicit trade can be found in a comparison of Transparency International’s Corruption Perceptions Index with Schneider’s estimates of the size of Europe’s shadow economies.⁶¹ The Institute of Economic Affairs contends that there is a significant correlation between corruption and illicit economic activity, as demonstrated in Figure 1. Here the R² value – or how much of the variability observed in the target variable is explained by the regression model – is 0.5899.

Figure 1: Corruption/shadow economy (% of GDP)



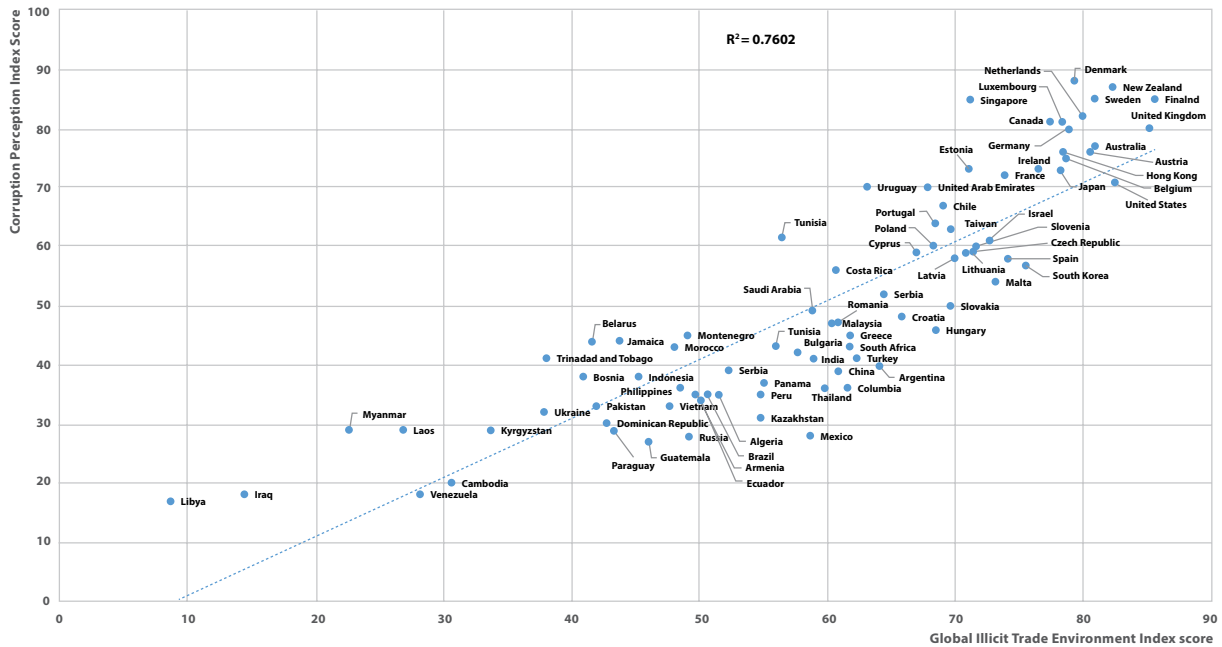
Source: Snowden, C. (2012). *Drinking in the Shadow Economy* [IEA Discussion Paper No. 43]. London: Institute of Economic Affairs. http://www.iea.org.uk/sites/default/files/publications/files/Drinking%20in%20the%20Shadow%20Economy_0.pdf. p. 8.

Looking even more closely at the phenomenon of illicit trade, TRACIT conducted a regression analysis of Transparency International’s *Corruption Perception Index* (CPI) and the Economist Intelligence Unit’s *Global Illicit Trade Environment Index*. In this case, the relationship is even stronger, as evidenced by an R^2 value of 0.7602 or 76%, compared to the 59% that came out of looking at corruption and Schneider’s estimates for Europe’s shadow economies. In other words, there is a robust correlation between corruption (as measured by Transparency International’s CPI) and illicit trade (as measured by the EIU’s Global Illicit Trade Environment Index).

Support for the strength of this correlation can be found in work by Interpol, showing a clear link between illicit trade in counterfeits and other types of crime, notably corruption and bribery – affecting all regions of the world and all industry sectors.⁶²

Furthermore, corruption has been found to be a factor in perpetuating transnational environmental crime, where criminals “take advantage of the ‘upperworld’ of corrupt officials and politicians to evade enforcement and control mechanisms and protect the illegal chains of custody,” and that “[l]ocal officials, customs officers, police and the judiciary are bribed to overlook illegal shipments, to assist with false paper trails and forged documentation, to help evidence disappear during prosecutions, to delay or drop prosecutions, and even to return no convictions in the cases of those who are brought to trial.”⁶³

Figure 2: Corruption and Illicit Trade – Regression Analysis



Source: TRACIT regression analysis based on data from Transparency International. (2019). *Corruption Perception Index 2018*. Berlin: Transparency International. <https://www.transparency.org/en/cpi/2018>; and The Economist Intelligence Unit. (2018). *The Global Illicit Trade Environment Index 2018*. London / New York / Hong Kong / Singapore / Geneva: The Economist Intelligence Unit. <http://illicittradeindex.eiu.com>.

Conversely, controlling corruption has been found to be “key to combating illegal trade in drugs (pharmaceuticals and illicit drugs), people, cyber resources, cigarettes, alcohol, and other legitimately produced goods, and endangered natural resources like ivory, rhino horn, and protected timber.”⁶⁴ Research by George Mason University also shows that “there is not one form of corruption or one level of official that is responsible for this trade,” meaning that strategies to address corruption as a facilitator of illicit trade “must therefore range from petty bribery to heads of state to the offshore banks that harbor the proceeds [and that] only by using diverse anticorruption strategies can one begin to tackle both the national and transnational corruption that facilitates this trade.”⁶⁵

Additional correlations have been conducted by the OECD, indicating the collective influence of corruption on trafficking in persons. A comparison of the categorization of countries in the US Trafficking in Persons 2014 report with the ranking of countries in Transparency International’s 2014 Corruption Perception Index, based on the methodology introduced by Lyday in 2001, finds that countries that make the least effort in fighting trafficking in persons are also those who have high levels of perceived corruption.⁶⁶

III. DOCUMENTING CORRUPTION IN ILLICIT OPERATIONS

While the following chapters will look at corruption in specific sectors of illicit trade, it is important to note that there are significant commonalities across sectors. For example, “once officials have accepted bribes to look the other way, the same smugglers can move people, arms, and drugs across the same border together or at different times, and in different combinations.”⁶⁷

Further to establishing the correlation between corruption and illicit trade generally, this chapter delineates overarching trends and specific cases that illustrate the manifestation of corruption in illicit trade in agrifoods, alcohol, fishing, forced labor, logging, wildlife, pharmaceuticals, pesticides, precious metals and gemstones, tobacco products, petroleum, and consumer products vulnerable to counterfeiting and piracy.



ILLICIT TRADE IN AGRI-FOODS

Situation

Illicit trade in agri-foods ranges from economically-motivated adulteration (EMA) – or food fraud – to large scale smuggling of agriculture products. Food fraud is the intentional sale of sub-standard food products or ingredients for the purpose of economic gain that includes food types such as meat, dairy products, fish and seafood, fruit juices, oils, honey, spices and wine. Food fraud can mean the substitution or dilution of an authentic ingredient with a cheaper product (such as replacing extra virgin olive oil with a cheaper oil), flavor or color enhancement using illicit or unapproved substances (such as unapproved dyes), and substitution of one species with another (such as the European horse meat scandal).⁶⁸

Food fraud can have life threatening consequences. For example, investigating hazelnut products from Georgia, German investigators found additions of peanuts, an allergen. Peanuts are relatively cheap and would result in significant economic gain for the perpetrator.⁶⁹ In Italy, an Abrezzo factory sprayed eastern European curds with chemicals to imitate fresh mozzarella.⁷⁰

Understanding corruption in the illicit trade in food

Researchers at AgriFutures Australia contend that “the more prevalent corruption and organised crime are in a country, the more plausible it is that fraudulent ingredients and/or products will pass through any food control systems in place in that country.”⁷¹ Bribery of regulators and the assistance of corrupt public officials in placing illicit products in the market endangers food supplies and can have wide-ranging consequences that go beyond a specific country’s borders.

Incidents of corruption facilitating illicit trade in agri-foods

The following section describes one of the most notorious cases to date of corruption related to illicit trade in the agri-foods sector. The case not only shook the domestic Brazilian market, but also severely impacted Brazilian exports.

In 2017, Brazil's Federal Police conducted raids and searches as part of a probe of food processors — among them BRF SA, the world's largest poultry exporter, and JBS SA, the world's No. 1 meatpacker — accused of bribing regulators to loosen oversight by ignoring the adulteration or expiration of processed foods.⁷² Searches were carried out across six Brazilian states in “Operação Carne Franca”, or “Operation Flesh Is Weak”, deploying more than 1,100 officers for 194 raids and 38 detention orders. According to the Federal Police, this is the largest operation ever carried out.⁷³ Police said “watchdogs in the food-producing states of Paraná, Minas Gerais and Goiás openly helped producers place adulterated products in the marketplace.”⁷⁴ Food processors bribed state food safety auditors to issue fake sanitary permits, forgo normal oversight work, and turn a blind eye to practices like exporting meat contaminated with salmonella to Italy.⁷⁵ Investigators also gave examples of the practices by regional food processing companies to market “a product labeled turkey sausage that had chicken and soybean protein substituted for much of the turkey”, and “adulterating expired meats with a type of acid that investigators said has been linked to cancer”, with these products then being sold to schools in the southern state of Paraná.⁷⁶ In sum, the charges included: misrepresenting products’ nutritional values; failing to meet hygiene standards in slaughterhouses; repackaging of out-of-date meat; tampering with the meat’s color and smell with acid and potentially carcinogenic chemical substances; and the overuse of harmful additives.⁷⁷

Authorities reported that bribes were channeled to the Brazilian Democratic Movement Party of President Temer.⁷⁸ As a result of the investigation, the Ministry of Agriculture ousted 33 law enforcement agents from their posts, and information in the case points towards two officials in the ministry spearheading the corruption scheme.⁷⁹ Brazilian federal judge Andre Duszczak ordered the arrests of top BRF executives including Pedro Faria, formerly chief executive, and Helio Santos Junior, who had previously resigned from his post of vice president of global operations.⁸⁰

Two years after the raids, BRF SA admitted to bribing food inspectors with bank deposits and health benefits. Police investigations showed that the company paid 19 million reais (USD 4.56 million) in bribes up until 2017.⁸¹ In 2019, 12 BRF plants were still banned from selling meat products to the European Union following the investigation. According to police, 39 of the 60 inspectors targeted in the investigation remained on active duty.⁸²

Brazil is the world’s largest beef and chicken exporter, and Operation Carne Franca resulted in a sharp drop in exports once the investigation was made public.⁸³ Following restrictions by key importers of Brazilian meat, weekly average exports of pork and poultry dropped by 22 percent.⁸⁴



ILLICIT ALCOHOL

Situation

Illicit trade in alcohol encompasses a wide variety of illegal activity that is typically characterized as:⁸⁵

- **Contraband/Smuggled Alcohol:** Alcohol with original branding that has been illegally imported/smuggled into a jurisdiction and sold, evading tariffs/customs. This includes beverages brought across the border via organized smuggling or in excess of the applicable traveler's regulated allowance. Smuggling of alcoholic beverages mirrors the illicit tobacco market and petroleum fuels theft, where criminals move products across borders with the express purpose of evading the payment of excise duties or profiting from tax arbitrage by reselling product in higher tax markets.
- **Counterfeit Alcohol:** Fraudulent imitations of legitimate branded products, including refilling, falsification and tampering. These beverages infringe the intellectual property rights of legitimate producers and present brand reputational risk and potential liability. It is often produced in illicit factories and sometimes substitutes lower grade alcohol not intended for human consumption such as denatured ethyl alcohol.
- **Illicit Artisanal:** Alcoholic beverages produced following artisanal practices, including home production. Artisanal alcoholic beverages are considered illicit if they are produced for commercial purposes, and if their production and/or sale violate local law.
- **Tax Leakage:** Legally produced alcohol beverages on which the required excise tax is not paid in the jurisdiction of production.
- **Non-conforming Alcohol:** Products that are not compliant with production processes, guidelines, or labeling legislation. Includes products produced with industrial alcohol and products not meant for human consumption but diverted to the market for alcoholic beverages (i.e., pharmaceutical alcohol, mouthwash, perfume.)

The World Health Organization (WHO) estimates that approximately 25% of total global alcohol consumption is unrecorded (either homemade and/or illegal).⁸⁶ Another regional study by Euromonitor International in 24 Latin American, African and Eastern European countries estimated that 25.8% of the 42.3 million hectoliters of pure alcohol consumed yearly across the countries was illicit, providing illicit businesses with USD 19.4 billion sales.⁸⁷ In addition to the harm to consumers and economic consequences for licit actors, governments are also facing significant fiscal losses, with an estimated US\$ 1.7 billion⁸⁸ in fiscal loss for governments across 14 Latin American markets and USD 1.8 billion across 8 African markets.⁸⁹

Understanding corruption in the illicit trade in illegal alcohol

Corruption in customs and law enforcement has been identified to be a driver of the unofficial alcohol market.⁹⁰ Euromonitor argues that in countries where alcohol-related regulations are poorly enforced, they are “sometimes rendered ineffective by corruption.”⁹¹ Euromonitor further states that “corruption, complicity, and collusion can hinder collaboration and starve governments of the internal will to enforce policies” and that “bribery is particularly common and it can occur in all parts of the supply chain.”⁹²

Supply chains are complex, and bribery can undermine the coordination required between countries to prevent smuggling and between levels of government to ensure effective enforcement, as well as at national government agencies responsible for revenue, border, police, health. Given high financial stakes, criminals resort to “bribery, intimidation and violence to facilitate their illegal transactions.”⁹³

Incidents of corruption facilitating illicit trade in alcohol

- In September 2020, Costa Rica’s Attorney General’s Office announced that 12 raids, resulting in 31 arrests, had disbanded a wide-reaching network smuggling contraband alcohol into Costa Rica from Panama. 20 police officers had been recruited by the criminal group to help them circumvent checkpoints.⁹⁴
- In Libya, smugglers offered Tobruk police officers a LD 50,000 bribe – which police turned down – after the smugglers were caught with a large consignment of alcohol originating from Egypt.⁹⁵
- In 2021, reports from India indicated that an officer was transferred after writing a letter to his counterparts across Bihar’s 40 police districts exposing details about illicit liquor trade being carried out “at all police stations” with the involvement of officials and local public representatives. In the letter, *The Indian Express* reported that “Sinha asked for a probe into the properties owned by constables, sub-inspectors and inspectors of the Excise Department and urged that their mobile phones and those of their relatives be kept under surveillance to monitor connections with liquor mafia” and that “liquor sale is being carried out clandestinely under jurisdiction of all police stations with constables, sub inspectors and inspectors of Excise Department getting bribed.”⁹⁶



COUNTERFEITING AND PIRACY OF CONSUMER GOODS

Situation

The global trade in counterfeit and pirated goods accounts for the largest economic value of all forms of illicit trade, robbing the legitimate economy of jobs and economic growth, while at the same time putting consumers at risk to unsafe, inferior and ineffective products.⁹⁷

The OECD reports that counterfeiting and piracy in international trade alone has grown from USD 250 billion annually in 2007⁹⁸ to USD 509 billion in 2016, representing 3.3 percent

of world trade, and up to 6.8 percent of EU imports from third countries.⁹⁹ 2019 numbers are at a similar level, with counterfeits representing an estimated 2.5 percent of world trade, and 5.8 percent of EU imports.¹⁰⁰

Examples of counterfeit and pirated goods include:

- High-end luxury goods such as counterfeit watches, perfumes and leather goods.
- Personal electronic products, such as mobile phones, personal computers, TVs, gaming devices, and their associated products such as printer ink cartridges.
- Household and personal care products such as laundry detergents, toys, cosmetics and shampoos.
- Vehicle spare parts, including brakes, batteries and airbags.
- Copyright piracy of movies, television, music, live performances, computer software and video games.

Effective IPR enforcement is crucial in safeguarding the health of consumers, maximizing the value of human creativity and innovation, promoting economic development and deploying modern technologies, but as noted by Europol, “trading in counterfeit products is a relatively low risk activity, involving minimal penalties whilst providing high profits, and will increasingly attract [organized crime groups] previously involved in other crime areas.”¹⁰¹

Understanding corruption in the illicit trade in counterfeits

According to the UNODC, “corruption and bribery are inherently linked to the illicit trafficking of counterfeit goods, especially when these are shipped internationally.”¹⁰² The significance of corruption as a facilitator is echoed by the OECD, stating that “high levels of corruption and gaps in intellectual property rights enforcement [...] are the crucial factor for trade in fakes.”¹⁰³ Furthermore, criminal networks use bribery or extortion of government officials to reduce disruptions in their illicit distribution channels and risks of punishment for their unlawful activities.¹⁰⁴

Corruption can manifest itself in myriad ways, with the most common being to bribe Customs officials to ensure that counterfeit goods avoid inspection, to bribe law enforcement officers to provide advance notice of raids and protection during investigations, and finally as a means to derail the criminal justice phase once a crime has been uncovered.¹⁰⁵

Incidents of corruption facilitating illicit trade in counterfeits

The following examples illustrate a few of the ways corruption plays a role in counterfeit supply chains:

- In 2018, U.S. Immigration and Customs Enforcement Homeland Security Investigation seized 181,615 counterfeited items estimated to be worth nearly USD 43 million in Laredo, Texas. In reference to the seizure, ICE stated that smugglers who typically transport illicit goods into Mexico often fail to file required export documents through CBP’s Automated Commercial Environment; they exploit the ports of entry by clandestinely smuggling merchandise to Mexico; and “once in Mexico, the smugglers bribe Mexican cartels who often extort Mexican regulatory and law enforcement officials so that the merchandise passes without being inspected or paying import duties.”¹⁰⁶

- In Italy, a military search of what appeared to be a normal shop revealed a counterfeit manufacturing atelier and 140,000 counterfeit items of premium brands, including shoes, logos and fake labels.¹⁰⁷ The counterfeiter was arrested on the spot for his illegal activities and for trying to bribe the Italian authorities with €850 by “inviting them to go and ‘get a coffee’.”¹⁰⁸



ILLEGAL, UNREGULATED AND UNREPORTED FISHING

Situation

Illegal, unregulated and unreported fishing (IUU) are those fishing activities that contravene regional, national or international fisheries conservation or management measures, or occurs outside the reach of these laws and regulations.¹⁰⁹

IUU fishing consists of these distinct but related elements:

- Illegal fishing refers to activities conducted by national or foreign vessels in waters under the jurisdiction of a State, without the permission of that State, or in contravention of its laws and regulations. It also may include violations of the laws, regulations, and conservation and management measures adopted by a fishing vessel’s flag State; and violations of national laws or international obligations, including the obligations of cooperating states to relevant regional fisheries management organizations (RFMOs).
- In practical terms, illegal fishing can include fishing without a license; fishing in a closed area or marine protected area (MPA); under-reporting catches; keeping undersized fish; using prohibited fishing gear types; or illegally transshipping fish.
- Unreported fishing refers to fishing activities (i) which have not been reported or have been misreported to the relevant national authority in contravention of national laws and regulations; or (ii) undertaken in the area of competence of a relevant RFMO which have not been reported or have been misreported in contravention of the reporting procedures of that organization. Unreported fishing includes cases where fishers may only report a portion of a catch so as to fall within quotas, may fail to report the harvest of non-targeted species, or simply avoid reporting all together. Examples include keeping two fishing logs: an official log for the inspectors and a ‘confidential’ log for the owner. Fishers also may falsely record vessel locations or offload fish at ports with low regulatory and inspections standards, so called ‘ports of convenience’.¹¹⁰
- Unregulated fishing is a broader term, which refers to fishing activities conducted by vessels without nationality, or those flying the flag of a country not party to a RFMO within the jurisdiction of that RFMO, or more generally fishing in a manner which contravenes the regulations of the RFMO. This also includes fishing in areas or for fish where there are no applicable conservation or management measures, and where such activities are conducted in a manner inconsistent with State responsibilities for the conservation of living marine resources under international law.

The Food and Agriculture Organization of the United Nations (FAO) estimates that 11–26 million tonnes of fish are harvested illicitly each year, worth between USD 10 and USD 24 billion.¹¹¹

Understanding corruption in the illicit trade in IUU fishing

As highlighted by the UNODC, “corruption is a facilitator of nearly all types of crime, including fisheries crime,”¹¹² and corruption is increasingly recognized as a major challenge for the sustainable management of fisheries.¹¹³ In IUU fishing, this includes officials taking bribes to issue licenses or to verify forged fishing licenses, and port officials allowing businesses to knowingly import mislabeled species to evade higher tax rates.¹¹⁴ Bribing inspectors is also commonly done at landing sites, “if caught for violating regulations, but also in other situations to establish a mutual relationship.”¹¹⁵ A sociological survey found that 68 percent of fishermen and 76 percent of inspectors noted that the fish is harvested in excess of quotas, and that inspectors identified corruption in controlling bodies as one of the main reasons.¹¹⁶

UNODC states that “corruption enables fisheries crimes to occur at every stage of the value chain, and almost without exception results in significant loss[es] of revenue for the country in question.”¹¹⁷ Corruption significantly undermines enforcement efforts and has also emerged as “a vital component to the transport of IUU fishing.”¹¹⁸

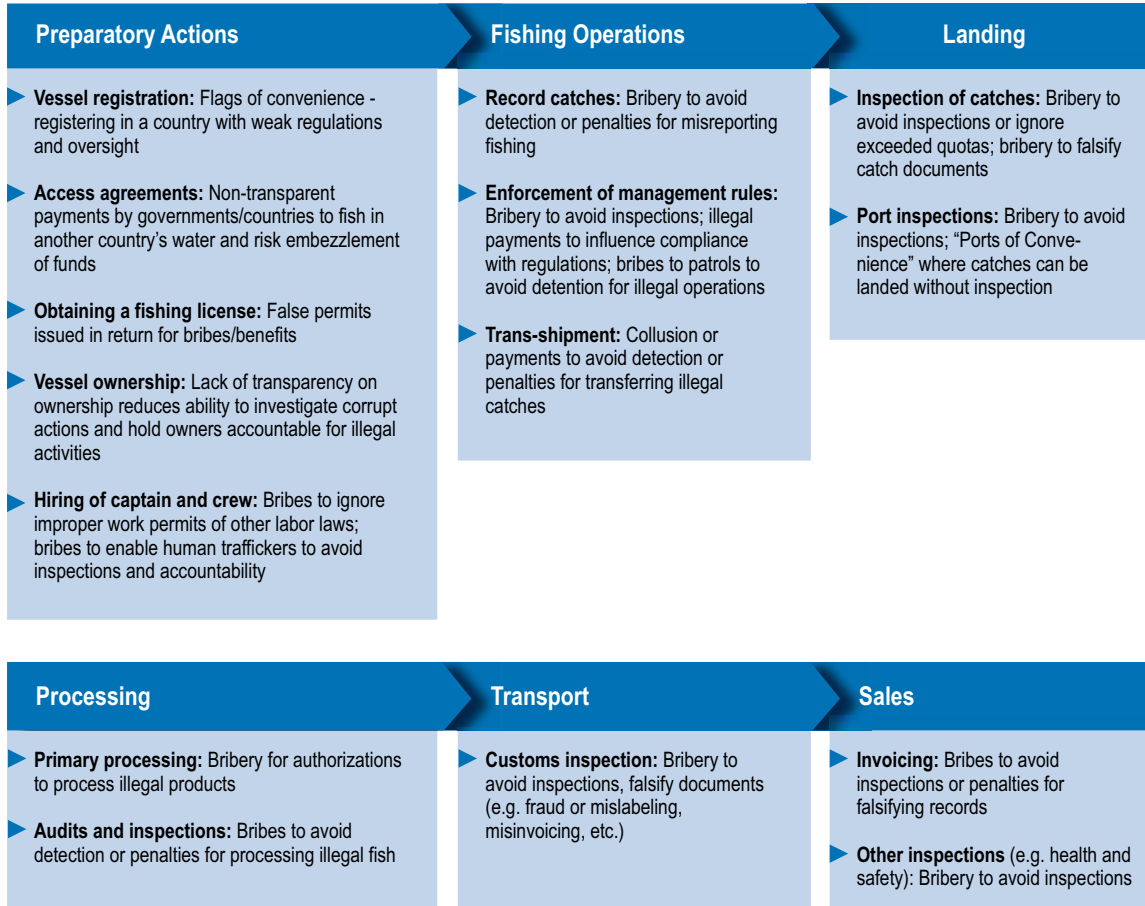
Building on work from INTERPOL, UNODC and Norad, UNODC has published corruption typologies specific for the fisheries sector. These include:

- Corrupt information sharing – sharing of information that undermines the element of surprise for spot checks and enforcement actions, such as confidential information on scheduling and locations, in exchange for bribes.¹¹⁹
- Corrupt logistics networks – establishing networks which may include bribing officials in order to move illegally caught fish across borders.¹²⁰
- Corrupt licensing payments – an official or minister issues fishing licenses in their exclusive economic zone in exchange for an illicit premium or side payment.¹²¹
- Corrupt market inspectors – corrupt officials commit fraud by misreporting the value or quantity of fish at first sale landings of fishery products.¹²²
- Corrupt garnering of community favor–funding of community projects by individuals and businesses in towns where they have current or future interests so that “once these projects have been delivered, community members are significantly less likely to report any illegal, suspicious or corrupt activities.”¹²³
- Corrupt maintenance of over-investment – fishing companies find alternative, “potentially illegal ways in which to increase their profits and thus maintain their levels of investment,” after a substantial reduction to a company’s fishing quota.¹²⁴
- Corrupt approval of seafood certificates – the issuance of false certificates and allowing the purchasing of certificates to take place without required quality assurance and testing, resulting in substandard or untested products entering the market.¹²⁵

RUSI also reports on “the issuance of bribes to navy patrols to avoid detention and bribery of fisheries observers mandated to report wrongdoing onboard.”¹²⁶

Along similar lines, the World Wildlife Fund (WWF) has the following breakdown of corruption risks in fishing supply chains:

Figure 3: Corruption Risks along the Seafood Supply Chain



Source: Freitas, B. (2021). *Corruption in the Fisheries Sector: Import Controls, Transparency, and WWF Practice*. n.p.: Targeting Natural Resource Corruption. https://files.worldwildlife.org/wwfmsprod/files/Publication/file/38f9xu5zq_Fisheries_KP.pdf?_ga=2.82448726.17537457.1670880531-1964751484.1669660994. p. 2.

It is important to note that “it is not only the officers and inspectors interacting with fisheries operators along the value chain who are susceptible to corruption, but also those investigating the corrupt acts themselves.”¹²⁷ This includes cases not being referred for prosecution, or prosecutions being dropped during the trial stage, but also that “investigators can be bribed or pressured not to collect evidence or to lose evidence that has been collected”; “Prosecutors can be bribed or pressured to make the decision not to prosecute or not to oppose a bail application”; “court officials can be bribed or pressured to lose the court file or key items of evidence”; and “judges can be bribed or pressured to acquit suspects or give light sentences.”¹²⁸

Incidents of corruption facilitating IUU fishing

- From at least 1987 through to 2001, South Africa-based Hout Bay Fishing Industries (Pty) Ltd illegally harvested enormous quantities of rock lobster and sold these at significant profit, with their scheme enabled by corrupt payments to Fishery Control Officers (FCOs).¹²⁹ UNODC reports that “Hout Bay directors paid the total of R424,247 (\$53,030) on 338 separate occasions to the FCOs, who then omitted to regulate Hout Bay’s landings, as required by their duties.”¹³⁰ The corrupt payments to FCOs of the Marine and Coastal Management of Cape Town ensured that FCOs turned a blind eye to overharvesting by Hout Bay Fishing Industries, and that they verified Hout Bay’s underreporting of products landed.¹³¹ Five executives of Hout Bay were found guilty in the United States, and the remaining executives were convicted in South Africa. Furthermore, the company director pleaded guilty to 301 charges of corruption relating to the bribing of fisheries inspectors.¹³² The case resulted in one of the largest fines (USD 22.5 million) for illegal trade in wildlife by U.S. authorities, prosecuted under the Lacey Act.¹³³
- In 2015, an organized criminal gang bribed public officials to grant them illegal fishing licenses and committed document fraud when selling their illegal catch using fake invoices.¹³⁴ Operation *Caught in the Net* (Enredados in Portuguese) resulted in the Federal Police and the Federal Prosecution Service of Brazil indicting 441 members of an organized crime gang operating in the Brazilian fisheries sector. The criminal gang was responsible for environmental damage estimated at R\$1.28 billion (USD 320 million).
- In the Cook Islands, the Minister of Marine Resources was sentenced to four years and four months imprisonment after having been found guilty of accepting a bribe as a reward for issuing fishing licenses to Luen Thai Fishing Venture Ltd. In a two-year period between 2011 and 2013, the Minister signed and issued 18 foreign fishing vessel licenses. UNODC reports that when the Minister was interested in buying a resort but could not secure financing for it, “the Minister directly approached the Chief Operating Officer of Luen Thai for a loan through Luen Thai’s Cook Islands company”, ultimately lending the Minister USD 256,745 – where “this personal connection and the friendship developed by the Minister, through his official role and capacity, facilitated the acquisition of a loan he would otherwise not have been able to secure.”¹³⁵
- In 2011, Japanese tax investigations found that “Japanese companies had paid bribes of as much as ¥500 million (~USD 6 million) to Russian fisheries officials in order to exceed the fisheries quotas.”¹³⁶
- In South Africa, a police official doing coastal patrols was offered money to avoid a certain area and turn a blind eye to abalone poaching that was planned in the area. This particular official “had permission from the Director of Public Prosecutions (DPP) to engage in such activities with the intention of stamping out corruption in the area.” Upon accepting payment, the group was arrested and group members imprisoned.¹³⁷
- There are reports that South African fish operators received bribes to falsifying paperwork for the United States, thereby allowing the smuggling of more than 600 tons of illegally caught rock lobster and more than 2,800 kg of Patagonian toothfish.¹³⁸

- In Ukraine, two employees from Ukraine’s State Fisheries Agency were arrested after extorting monthly bribes from illegal fishers for allowing them to fish overtime and catch restricted species and taking a cut of their illicit profits. For valuable catches such as the beluga sturgeon the officers reportedly took a 50% cut of the value of the catch.¹³⁹
- In Guinea, captains operating illegal vessels were regularly giving boxes of fish and money to enforcement authorities in order to avoid arrest.¹⁴⁰
- In the Pacific Islands, licensing officials are reported to be “treated handsomely... by foreign companies in return for licensing favours” such as license fraud or licensing private vessels.¹⁴¹
- In 2019, Samherji, an Icelandic fishing conglomerate had “allegedly bribed government officials in Namibia and Angola for rights to massive fishing quotas.”¹⁴²
- In regions surrounding Lake Victoria in East Africa, corruption is reported within the Government’s co-management partner that works to implement government regulations. There are reports of bribery for serving as informants on impending patrols, and executives asking the offender to pay an agreed upon amount so that the case is not forwarded [to the government fisheries department].¹⁴³
- In addition to corruption in licensing and landings, OECD also reports on tax evasion and corruption. After finding evidence of significant payments described as ‘consultancy services’ to an offshore jurisdiction, a Fisheries Inspectorate, a Tax Administration and a Police Economic Crime unit found evidence that exported dried codfish was described as dried cod heads in the paperwork, resulting in an import duty of 10% instead of the correct import duty rate of 20%.¹⁴⁴



FORCED LABOR, CHILD LABOR AND HUMAN TRAFFICKING

Situation

Close to a century after the adoption of the International Labour Organization’s (ILO) Forced Labour Convention, 28 million people continue to be trapped in a situation of forced labor.¹⁴⁵

The UN defines forced labor under the ILO Forced Labour Convention as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” There are three central elements to what is defined as forced labor:

1. Work or service – covering all types of work in any industry, sector or activity in both the formal and informal economy.
2. Threat of penalty – referring to a wide range of penalties including penal sanctions and various forms of direct or indirect coercion, such as physical violence, psychological threats, non-payment of wages, and a loss of rights or privileges (e.g., promotion, transfer, or access to new employment).¹⁴⁶
3. Involuntariness – meaning that the person in question did not take up the job based on free and informed consent and is not free to leave at any time.

The Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, introduces the notion of forced labor into the trafficking in persons space: “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”

The purposes of exploitation that are covered by the Protocol include but are not limited to:

- the exploitation of the prostitution of others or other forms of sexual exploitation;
- forced labor or services;
- slavery or practices similar to slavery;
- servitude; and
- removal of organs.

While not all trafficking is committed for the purpose of forced labor — with organ trafficking being one example of this — forced labor exploitation is one of the purposes of trafficking in persons that is included in the definition set forth in the *Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children*.

Understanding corruption in trafficking in persons

Trafficking in persons stands apart from most other illicit trades in that it does not have a legal equivalent and is illicit in all of its forms. It is nonetheless facilitated by corrupt actors, and it has been argued that trafficking in persons would not be as prevalent and widespread if not for the leverage supplied by corruption.¹⁴⁷ The International Bar Association President David Rivkin characterized its prevalence by stating that “Corruption is an endemic feature of human trafficking. I think it may even be fair to say human trafficking could not exist without corruption.”¹⁴⁸ Echoing this statement, Holmes argues that human trafficking often involves police collusion¹⁴⁹ and could not occur on the scale that it does if it were not for the complicity and collusion of corrupt officials with criminal gangs.¹⁵⁰

In order to assess the role of corruption, Cho ran over 200 regressions looking at 70 push and 63 pull factors of human trafficking and found that control of corruption decreased rates of trafficking from origin countries.¹⁵¹ Guth finds that “if human trafficking is to be significantly reduced, then corruption must be curbed.”¹⁵²

Research by the OECD finds that trafficking in persons relies on systemic corruption by ensuring that “traffickers can operate undisturbed and under the radar, without risk of being arrested or convicted even when a trafficking crime has been uncovered [as well as allowing] for the re- trafficking of victims that were able to escape their situation of exploitation.”¹⁵³ Moses similarly finds that “corruption is the major contributor and catalyst of human trafficking.”¹⁵⁴

Corruption related to trafficking in persons has been documented in a wide range of activities “from active involvement in known corrupt practices, to negligent or passive acts that allow corruption to happen.”¹⁵⁵ This involvement can for example include: (i) “entry into a country via ‘back-door’ or ungazetted routes, with possible bribery to border personnel”,¹⁵⁶ (ii) “[bribery of] police officers to ‘close an eye’ on their vice and at times to be alerted if [police] are planning a raid on their premises”,¹⁵⁷ (iii) “lower traffickers’ recruitment costs by returning escaped victims to the traffickers”¹⁵⁸(iv) obstructing investigations, ignoring trafficking red flags, transporting victims, refusing to register trafficking complaints, falsifying documents;¹⁵⁹ and (v) bribery of judges to avoid punishment of offenders.¹⁶⁰

Evidence of the collective influence of corruption on trafficking can be found in the work of the OECD. A comparison of the categorization of countries in the US Trafficking in Persons 2014 report with the ranking of countries in Transparency International’s 2014 Corruption Perception Index based on the methodology introduced by Lyday in 2001 finds that countries that make the least effort in fighting trafficking in persons are also those who have high levels of perceived corruption.¹⁶¹

Looking at the intersection between corruption and the phases of TIP through a global case review, research has shown that corrupt public officials are found to facilitate the execution of the crime, allow the crime to be invisible, and facilitate impunity once a case is detected, but the involved actors differ depending on the phase in question.¹⁶² The actors that are more likely to be involved in the transportation phase are border control, customs and immigration officers, or high-ranking politicians that can facilitate the issuance of visas. In the exploitation phase, actors involved are more likely to be members of law enforcement such as police officers conducting inspections or raids. Corruption also allowed the trafficking crime to remain invisible in the exploitation phase of the crime. For the purpose of facilitating impunity once a case is detected, corruption primarily plays a role in the criminal justice phase of trafficking to prevent a case from receiving due treatment. The involved public officials differ, ranging from judges and prosecutors, to police officers and customs and border officials.¹⁶³

Based on a UNODC and Council of Europe research, the OECD summarizes the trafficking chain:¹⁶⁴

Table 2: When, who and what identified by UNODC and the Council of Europe in the trafficking chains

| | Trafficking in persons chain | Criminal justice chain | Protection and support of victims |
|------|---|--|---|
| When | The trafficking chain consists of the recruitment of victims, the provision of documentation (identity papers, visas, permits), the transport of victims, which may include border-crossing, their exploitation, as well as the laundering of the proceeds of the crime. | The criminal justice chain ranges from the drafting and adoption of legislation, to crime prevention measures, preliminary investigations and investigations into specific offences, the search and seizure of proceeds, prosecution, trial and verdict, confiscation of proceeds, and enforcement of sanctions. | This protection and support of victims stage includes the provision of support, protection and shelter to victims of trafficking in persons. |
| Who | Corrupt actors within this chain of activities may include police, customs officers, visa officers or embassy staff, border control authorities, immigration services, other law enforcement agencies, intelligence/security services, armed forces (national or international), local officials, persons/groups/parties with influence on public officials, as well as private sector actors, such as travel agencies, airlines, transportation sector, financial institutions, and banks. | Corrupt actors may include parliamentarians, government officials, police, customs border control, immigration services and other law enforcement agencies, prosecutors, investigative judges, intelligence/security forces, local officials, as well as persons/groups, parties with influence on public officials. | Actors involved may include NGOs and civil society organisations, as well as public social service institutions. |
| What | Corrupt acts may range from passivity (ignoring or tolerating trafficking), or actively participating in or even organising trafficking in human beings, that is, from a violation of duties, to corruption or organised crime. | Acts pointing to corruption or organised crime, or at least to a violation of duties, may range from passivity (ignoring, tolerating, avoiding action) to an active obstruction of investigations, prosecution and judicial proceedings, the revealing and selling of information, and the perverting of the course of justice. Lack of awareness, capacities and skills may cause such behaviour, which may range from mere violation of duties to corruption and involvement in organised crime. | Corrupt behaviour may range from passivity and "trade offs" (passivity in order not to compromise access to victims or cooperation with official institutions), to revealing or selling information on victims, betraying victims, or that an organisation is infiltrated by traffickers. |

Source: OECD. (2016). *Trafficking in Persons and Corruption: Breaking the Chain*. Paris: OECD Publishing. p. 38.

Incidents of corruption facilitating trafficking in persons

As with other corrupt involvement, no country or part of the world is immune:

- In Brazil, corruption is reported to be a causal factor in human trafficking.¹⁶⁵
- In South Africa, it was reported that Department of Home Affairs officials took bribes in exchange for issuing travel documents to trafficking victims. South African Police officers alerted traffickers of upcoming raids, and the Department of Social Development took victims of trafficking from shelters and safety homes back to the traffickers.¹⁶⁶
- In Argentina, the Court established in Case 'Cardaci Y Mossolini' that corrupt police involvement in the harboring of four Paraguayan women for the purpose of commercial sexual exploitation facilitated the crime. The officer was found guilty of passive bribery and dereliction of the duties of public official.¹⁶⁷

- In Australia, a corrupt immigration official facilitated the exploitation through bridging refugee visas for the victims. The case was brought to the attention of the Australian authorities after one of the victims begged a client to contact the authorities to help her escape.¹⁶⁸
- In the Philippines, a corrupt judge targeted four police officers after they had successfully rescued a number of trafficking victims. The case file reads that “the rescued girls were taken by the suspected traffickers, among others, to a beach resort where they were threatened and coerced into signing a retraction of their complaint as well as signing a complaint against the police officers [...] for grave coercion and qualified trespass.” Furthermore, the judge in the case arrived at the beach resort and conferred with the suspects in relation to the retraction of the complaint and filing of the new one. The police officers testifying in the case stated that this was followed by a drinking session and ‘entertainment.’¹⁶⁹

In the US, there are several recent cases of corrupt involvement in trafficking operations.

- In December 2021, a 14-count indictment was unsealed in Federal court in Brooklyn charging 6 persons, including a Village of Brewster police officer, with “conspiracy to transport minors and the transportation of minors, sex trafficking, conspiracy to commit Hobbs Act extortion, promotion of prostitution, use of interstate facilities to commit bribery and related conspiracy counts.” In a press release from the US Attorney’s Office of the Eastern District of New York, US Attorney Peace states that “As alleged, the defendants conspired to lure young women and minor girls to travel to the United States based on false promises of a better life and forced them into prostitution once they arrived. The defendants allegedly received assistance in carrying out this conspiracy from a corrupt police officer who traded the honor of his badge and sworn oath for free sexual services.” The press release outlines that “For more than eight years, Peiffer [the Village of Brewster police officer] allegedly directed members of the Cid-Hernandez Sex Trafficking Organization and the Godinez Prostitution Business to deliver women to him, including at the BPD police station, so that he could engage in sexual activity with the women at no cost to Peiffer. In exchange, Peiffer provided the Cid-Hernandez Sex Trafficking Organization and the Godinez Prostitution Business protection from arrest, including by advanced warning of law enforcement operations and intervening to prevent arrest.”¹⁷⁰

Other cases from the United States include:

- ‘United States v Kyongja Kang’, where young South Korean women were trafficked to work in nail salons and a bar in Queens, New York; and a corrupt customs official tried to deport a victim in an effort to prevent her from testifying against her traffickers in exchange for a bribe.¹⁷¹
- A 2006 case where two New York City police officers were arrested following a ten-month investigation on charges of bribery relating to the protection of a brothel in Flushing, Queens (United States Attorney’s Office Eastern District of New York, 2006). Starting in June 2004, the officers accepted “sexual services, the payment of bar bills, and information leading to arrests that they believed could advance their careers, in exchange for permitting [the brothel owners] to operate their brothel and for carrying out raids at competing brothels.”¹⁷²

- A third case deals with a former police officer going rogue and the corrupt colleagues that helped him run his trafficking and gambling operations for years before being arrested. A three-year investigation that started from an internal tip resulted in the arrest of seven NYPD police officers in 2018. They had been recruited by a retired NYC vice detective, to act as “foot soldiers” in an illegal gambling and prostitution ring in Brooklyn and Queens, and faced prostitution, corruption and misconduct charges. The arrested officers were accused of tipping off ongoing police investigations into the brothels, providing information in exchange for discounted sex or weekly monetary installments, giving physical descriptions of undercover officers – sometimes “relay[ing] the descriptions from [the] station house, and other times, from outside the brothel, when [the officer in question] himself was part of an investigation”¹⁷³ – and being hired as doormen and muscle for the brothels.



ILLEGAL LOGGING AND ILLICIT TRADE IN TIMBER

Situation

The International Union of Forest Research Organizations (IUFRO) defines illegal logging and related timber trade as including “all practices related to the harvesting, processing and trading of timber inconsistent with national and sub-national law.”¹⁷⁴ This definition also may be extended to include violations of ratified international treaties and conventions. Such practices include, for instance, operating under a license that has been obtained illegally (e.g., involving corruption or collusion), logging in protected areas, exceeding permitted harvest quotas, processing logs without the necessary licenses, tax evasion and exporting products without paying export duties.” The definition also encompasses “related trade” when timber-based products are exported or imported in contravention to import or export laws.

The estimated worth of the global illegal timber trade is USD 50-152 billion annually.¹⁷⁵ Illegal logging is responsible for 15-30 percent of global timber production and represents as much as 50-90 percent of logging in many tropical countries.¹⁷⁶

Understanding corruption in the illicit trade in illegal logging

According to Transparency International, the sheer monetary value of deforestation makes corruption incredibly lucrative for the criminals involved.¹⁷⁷ It “weakens the rule of law and fuels the cycle of transnational crime.”¹⁷⁸ UNODC also highlights that the inherent characteristics of forests being geographically vast renders them particularly susceptible to corruption due to difficulties in oversight and enforcement.¹⁷⁹

One of the key reasons illegal logging continues in many parts of the world is because corruption enables criminals involved in environmental crimes to operate with impunity.¹⁸⁰ Reports from INTERPOL and UNEP show that corruption is entrenched in illegal logging operations, usually involving actors ranging from field officers to high-level officials throughout the supply chain.¹⁸¹ In fact, the link to corruption is so prevalent in the forestry sector that Interpol attributes USD 29 billion to criminal networks bribing officials to establish “safe passage” for the illegal movement of timber. Those criminal groups also exploit these same routes to transport other illicit goods, such as drugs and firearms.¹⁸²

At the highest level, corruption is manifested in politicians influencing the granting of land concessions and logging permits or influencing authorities responsible for scrutinizing and policing illegal behavior.¹⁸³ At lower levels, corruption involves law enforcement officials accepting bribes to turn a blind eye to trees being cut or illegally transported.¹⁸⁴

According to WWF, corruption is intrinsic and essential to illicit logging as the significant volumes of timber necessarily need to be laundered for export.¹⁸⁵ This is a complex process that includes the corrupt practices of falsification of forest inventories and harvest permit, as well as the validation of these, by public officials.¹⁸⁶ A 2016 UNEP and INTERPOL report noted that although 50 to 90 percent of the timber from some tropical countries is from illegal sources, “most illegally sourced and traded wood is either not considered or recognized as contraband by customs, or falsely declared as legally sourced and traded.”¹⁸⁷

Given that governments own and administer the vast majority of the world’s forests,¹⁸⁸ there are significant opportunities for corruption and manipulation of the public forestry administration. For example, corrupt government officials, including CITES Management Authorities, can make illegal timber look legal with a single piece of documentation.¹⁸⁹ As a private sector representative from the timber industry told TRACIT in an interview that, the primary weakness in this sector is the creation of false legal documents.

Interpol and Transparency International delineate corruption in the timber supply chain along the following lines:¹⁹⁰

- Logging permit issues – where government officials are bribed to influence the bidding process, or where bribes and political influence are used to facilitate logging without appropriate permits or to gain access to forests through questionable land concessions.
- Harvest – where inspectors or rangers are bribed to allow the illegal activity to continue.
- Transport – where transport documents are falsified, checkpoint officials are bribed to let trucks through, and enforcement officials are bribed to turn a blind eye to trucks carrying illicit logs.
- Processing – where mills launder illegal timber by mixing it with legally sourced logs, or timber certifiers can be paid off to “whitewash” illegally sourced logs – a form of timber laundering similar to money laundering.
- Export – where false claims are made on customs papers.
- Sale – where inspectors are bribed to cover up the sale of illegal timber or protected sources. Financial transactions also can be corrupted to hide paper trails of sales and to keep the illicit timber trade flowing.

- Enforcement – when violations are found, judicial corruption may prevent prosecution and accountability, leaving citizens without legal recourse.

Incidents of corruption facilitating illicit trade in illegal logging

- Interpol's *Operation Log* identified corruption through the issuance of fraudulent permits as a primary facilitator of illicit timber harvesting in nine West African countries – Benin, Burkina Faso, Côte d'Ivoire, Gambia, Ghana, Mali, Mauritania, Senegal and Togo – in 2015. More than USD 216 million in illegally harvested rosewood (*Pterocarpus Erinaceus*) and other timber species were seized, and 44 individuals were arrested.¹⁹¹
- In Peru, pervasive corruption is a key reason behind rampant deforestation. Estimates from investigative journalists – and verified by Peru's former director of the National Forest Service – show that an estimated 80 percent of timber production in the country has an illegal origin. Corruption can include everyone from a private forestry consultant preparing an annual logging plan, to local forest authority officials, supervisors at the regional level, or someone at the national level.¹⁹² Those who try to expose corruption are attacked, threatened, have been forced to resign, or had their jobs terminated.¹⁹³
- In Indonesia, the Corruption Eradication Commission estimates that as much USD 9 billion in state revenues were lost between 2003 to 2014 due to companies' underreporting of timber production, "a revenue loss that could occur only with pervasive high-level corruption."¹⁹⁴ Corrupt officials include forestry officials and local governors, as well as judges and law enforcement officials.¹⁹⁵ Researchers have highlighted a number of examples of corruption in illegal logging in Indonesia:
 - In 2007, two government officials and a logging company executive were convicted of illegal logging.¹⁹⁶
 - In 2008, a government regent received an eleven-year prison sentence for his role in illegal logging.¹⁹⁷
 - In 2014, one-third of Kalimantan regents were under investigation for corruption, where the dominant form of corruption was to accept bribes to issue permits.¹⁹⁸
- Also in Indonesia, Walhi reports that the modus operandi of what they term the 'Forest Corruption Mafia' includes:
 - Abuse of authority in issuing permits.¹⁹⁹
 - A forestry company facilitates law enforcement agencies, for example by providing an operational vehicle in Riau.²⁰⁰
 - Officials are provided "free shares" in a palm oil company.²⁰¹
- In Madagascar, there are reports that officials at one checkpoint did not confiscate banned ebony and rosewood, but instead systematically extorted a toll for each log from the transporters.²⁰²



TRADE IN ILLEGAL PESTICIDES

Situation

Agrochemicals and specifically pesticides are an integral part of conventional agriculture as insecticides, herbicides and fungicides help maximize crop quantity and quality by reducing the pests and diseases that cause damage to crops and limit crop yield.²⁰³ Given the global widespread use of pesticides – a market projected to reach USD 81.7 billion by 2027²⁰⁴ – it is not surprising that counterfeit and illegally-traded versions are finding their way into markets worldwide,²⁰⁵ with the share of illegal pesticides on the global pesticide market estimated to be as high as 25 percent.²⁰⁶ In developing countries, it is estimated that up to 30% of the pesticides sold are substandard,²⁰⁷ and in 2022, Europol warned of a rise in fake pesticide trafficking.²⁰⁸ Illegal agrochemicals include: obsolete or banned unauthorized pesticides; untested, unregulated, or unlicensed pesticides; unauthorized imports; counterfeit and fake pesticides; relabeled or mislabeled pesticides; and refilled pesticides containers.²⁰⁹

Counterfeit and illegal pesticides are often falsely declared to avoid international labelling requirements designed to ensure safety during transport. As a result, highly toxic, flammable or otherwise hazardous substances are transported without regard to the safety of the staff handling the product, bystanders and the environment.

Understanding corruption in the illicit trade of pesticides

The trade in illegal pesticides is often associated with corruption,²¹⁰ and corruption can play a role in all stages of the illegal pesticides trade cycle, involving a wide range of actors.²¹¹ For example, in the registration phase, it is corrupt state officials responsible for registration, patent checks and relevant tests. In the production phase, it is corrupt tax authorities and law enforcement. In the import process, it is corrupt customs officials. In the distribution and application phase, it is corrupt agronomists and soil care inspectorate officers. UNEP also highlights that “corruption and lax enforcement – often coupled with relabeling – allow for the return of seized stocks [of illicit pesticides] to the market.”²¹²

Table 3: Stakeholders in illegal pesticide trades

| Stakeholders in the illegal pesticides trade | | |
|--|--|---|
| STAGE OF LIFE CYCLE | TYPE OF ILLICIT PRODUCT | KEY STAKEHOLDERS |
| Registration | <ul style="list-style-type: none"> ▶ Counterfeit pesticides ▶ Substandard pesticides | Corrupt State officials responsible for: registration patent check relevant tests |
| Production (domestic) | <ul style="list-style-type: none"> ▶ Counterfeit pesticides ▶ Substandard pesticides | Irresponsible registered pesticides manufacturers Unregistered chemicals blenders (informal sector) Importers of improper active ingredients Irresponsible waste management companies (empty containers) Distributors , intentionally purchasing illicit products Irresponsible packaging manufacturers and printing houses Corrupt or inexperienced tax authorities Corrupt and/or inexperienced law enforcement Banks or other money transfer systems (informal sector) |
| Import | <ul style="list-style-type: none"> ▶ Counterfeit pesticides ▶ Substandard pesticides ▶ Banned pesticides ▶ Restricted pesticides | Transnational organized criminal groups Corrupt or uninformed or inexperienced customs officers Importers Logistics companies Banks or other money transfer systems |
| Distribution | <ul style="list-style-type: none"> ▶ Counterfeit pesticides ▶ Substandard pesticides ▶ Banned pesticides ▶ Restricted pesticides | Illegal producers or importers Distributors Banks or other money transfer systems Corrupt or inexperienced agronomists and extension services Farmers |
| Application | <ul style="list-style-type: none"> ▶ Counterfeit pesticides ▶ Substandard pesticides ▶ Banned pesticides ▶ Restricted pesticides | Farmers Illegal distributors Corrupt or inexperienced agronomists and extension services Corrupt or inexperienced soil care inspectorate officers Irresponsible waste management companies (empty containers) |

Source: UNEP. (2019). *The Illegal Trade in Chemicals*. [Third meeting of the intersessional process considering the Strategic Approach and sound management of chemicals and waste beyond 2020, SAICM/IP.3/INF/12]. Bangkok: United Nations Environment Programme. <http://www.saicm.org/Portals/12/documents/meetings/IP3/INF/IP3-INF-12-The-illegal-trade-in-chemicals.pdf>. p. 45.

UNEP’s outline is echoed by UNICRI and OSCE, stating that illicit traders in pesticides often rely on corrupt custom officers, law enforcement officials and staff in charge of pesticide procurement in the production and distribution phases to carry out their crime.²¹³

Incidents of corruption facilitating illicit trade in pesticides

- In India, officials from the Agriculture Ministry were arrested for cheating, criminal breach of trust and criminal conspiracy for receiving money to renew licenses under which fake and sub-standard pesticides were sold to farmers and overcharging the government for subsidized pesticides.²¹⁴



ILLICIT TRADE IN PETROLEUM

Situation

Oil and fuel theft along with various forms of fuel fraud are persistent and growing forms of illicit trade. Every year, it is estimated that USD 133 billion worth of fuels are illegally stolen, adulterated, or defrauded from legitimate petroleum companies,²¹⁵ with equally significant losses to governments through subsidy abuse and tax evasion.²¹⁶ The African Development Bank estimates the value of illicit oil trade in Africa is worth nearly USD 100 billion a year.²¹⁷

Improperly taxed and untaxed fuel are a major concern for governments. For example, international oil companies operating in Bulgaria estimate that between 20 and 40 percent of oil products sold were illegal and circumvented payment of excise duties and VAT.²¹⁸ In Northern Ireland, diesel tax fraud was estimated at GBP 80 million, or 13 percent of total taxable revenue from mineral oils.²¹⁹

While the most immediate effects may be in the country or countries where fuel is being stolen or smuggled, the ripple effects crossing the global marketplace include undercutting economic development, hastening environmental degradation and facilitating illegal global financial flows, money laundering, organized criminal activity and terrorism.

Understanding corruption in the illicit trade of petroleum

The petroleum sector is particularly susceptible to integrity violations due to the high complexity of activities, the close interaction between the public and private sectors, and the vast sums of money generated. By some estimates, more than 57 percent of all fraud cases in the oil and gas sector relate to corruption schemes.²²⁰

Illicit trade in petroleum happens when:²²¹

- Thieves installing illicit taps can divert oil or other refined products from pipelines.
- Stolen crude oil or refined products are siphoned off to small barges and waiting boats, which are then either refined locally or sent to sea to deliver the product to larger vessels/tankers.
- The use of the threat of violence to command a truck or ship and steal its cargo, where pirates will hijack a tanker ship, disable its tracking devices, and transfer its cargo to smaller vessels for distribution on the black market.
- Smugglers exploit price differentials between countries by smuggling cheaper, untaxed or heavily subsidized fuel into higher priced jurisdictions, enabling a profitable and less traceable sale. Higher-priced, nonsubsidized, and taxed fuels also may be diluted with smuggled lower-priced or subsidized fuels.

Incidents of corruption facilitating illicit trade in petroleum

- In Mexico, collusion has been reported between Pemex employees and organized criminal groups, with former and current Pemex employees installing tapping machines for third parties who pay up to USD 6,000 dollars for a single tap.²²² Installing a tap to divert oil requires information on when oil will not be flowing. In Mexico, this information would uniquely be known by Pemex²²³ employees. USD 6,000 is a considerable amount given the average yearly disposable income after tax is approximately USD 13,000 dollars.²²⁴
- Also in Mexico, two state police officers were arrested after they were found escorting a stolen-fuel envoy.²²⁵
- In Nigeria, government agencies, security forces and port authorities are known to provide fraudulent documentation and logistical support for hydrocarbons theft, with the complicity of security forces in particular being so brazen that “barges carrying stolen oil often travel openly.”²²⁶
- Bribery among border personnel related to fuel smuggling in Algeria is considered to be so common that the government replaced a large number of its border personnel in a crackdown in 2013.²²⁷
- In Thailand, fuel smugglers are estimated to spend over THB 100 million (USD 3 million) each year bribing Thai law enforcement personnel, politicians, and government officials.²²⁸ It is reported that up to 80 percent of fuel smugglers in the province of Songkhla set up arrangements where “customs officials turn a blind eye to contraband fuel in return for a share in the resulting profits.”²²⁹ Similar incentives are offered to officials at border checkpoints.²³⁰
- In Nigeria, oil company employees are bribed to allow unauthorized vessels to load oil; to allow authorized vessels to be filled with oil beyond their stated capacity with the excess then sold; to embezzle oil revenue; and for illicit profits to be made through the sale of export credentials.²³¹ In addition, two Nigerian admirals were found guilty of helping to steal an oil tanker and trying to sell stolen oil to an international crime syndicate. Ten officers were retired after reports that they were involved in smuggling stolen crude oil.²³²
- In Iraq, deals are made in advance with corrupt politicians who ensure that “their” appointed officials are working at a specified oil terminal when a tanker with stolen oil arrives. Subsequently, the surveyor hired by the government to inspect the cargo is bribed to pass it off as legitimate.²³³
- In Iran, both bureaucrats and political figures were involved in oil smuggling by granting permission for trade in the border areas, and by deputy commissioners issuing tokens worth Rs 200,000 to Rs 250,000 for the movement of individual vehicles carrying oil. More than 20,000 vehicles of this kind were involved in the illicit trade, resulting in significant illicit revenue generation.²³⁴



ILLICIT TRADE IN PHARMACEUTICALS

Situation

Valued at USD 4.4 billion,²³⁵ the global trade in illicit pharmaceuticals extends beyond the problem of “fakes” to include substandard, falsified, unregistered and unlicensed drugs as well as their theft, fraud, illicit diversion, smuggling and trafficking. The problem of illicit pharmaceuticals applies to everything from highly publicized lifestyle medicines to those used to treat malaria, cancer, heart disease and other serious illnesses. The issue also covers generic versions of prescription drugs and increasingly over-the-counter (OTC) medicines and fake medical devices such as contact lenses, condoms, syringes, surgical instruments, wheelchairs and radiotherapy machines. The illicit trade in pharmaceuticals encompasses more than the protection of intellectual property rights (IPR) as fake or faulty versions can present significant health and safety risks to consumers.

Understanding corruption in the illicit trade of pharmaceuticals

According to the Committee on Understanding the Global Public Health Implications of Substandard, Falsified, and Counterfeit Medical Products, “corruption allows for the manufacture, trade, and distribution of falsified medicines” where “complicit government officials are often bribed with revenue from the illicit pharmaceutical business.”²³⁶ Corruption can include the collusion of regulatory officials with criminal manufacturers and distributors by providing unwarranted certification or product approval, overlooking compliance or delaying product approvals of competitors.²³⁷ Bribery of procurement officials can also result in procurement contracts of falsified and unsafe products,²³⁸ and illicit manufacturers and distributors may bribe or collude with healthcare professionals to prescribe falsified medical products to their patients.²³⁹ GIABA states that in West Africa, “the fundamental problem that impedes a real fight against the counterfeiting of drugs resides in the preponderance of corruption within the supervisory, control and enforcement agencies.”²⁴⁰

As highlighted by Transparency International, “the most obvious short term impact of corruption in this sector is on patient safety,” where regulatory processes are circumvented as a result of a bribe, thereby putting consumers at risk.²⁴¹ For example, an estimated 267,000 deaths per year are linked to falsified and substandard antimalarial medicines, and up to 169,271 are linked to falsified and substandard antibiotics used to treat severe pneumonia in children.²⁴² Bate and Mathur found that “corruption is strongly correlated with poor quality drugs”²⁴³ and that “corruption in the healthcare system can lead to the proliferation of counterfeit producers who are not regulated and who pay bribes to government officials to avoid discovery and prosecution.”²⁴⁴

Incidents of corruption facilitating illicit trade in pharmaceuticals

- In 2019, corruption led officials in the Zambian Ministry of Health to award a public tender valued at USD 17 million to an unregistered company for health kits that were of poor quality and unsafe to use after a limited bidding process.²⁴⁵ In 2022, the Anti-Corruption Commission arrested and charged several high-level officials, including an Assistant Director of Pharmaceuticals Services and a former Minister of Health for conspiracy to defraud the government via corrupt procurement of illicit pharmaceuticals.²⁴⁶
- In Vietnam, a deputy health minister was involved in a fake-medicines trading ring, permitting imports of over 54 billion dong (USD 2.38 million) worth of fake medicines for domestic sale.²⁴⁷
- In Afghanistan, at least half of Afghanistan's pharmaceutical imports are illegally imported.²⁴⁸ According to the Independent Joint Anti-Corruption Monitoring and Evaluation Committee, corruption plays a significant role in the importation process – particularly in obtaining licenses and registrations, and in forgery and falsification of lab results.²⁴⁹



ILLICIT TRADE IN PRECIOUS METALS AND GEMSTONES

Situation

Gemstones and precious metals are highly vulnerable to illicit trade and often underpin larger money laundering schemes, corruption and military conflict. Their low weight, high value, high durability, stable pricing and ability to be easily moved or smuggled make them especially attractive to launderers and criminal financiers.²⁵⁰ Gemstones most common to illicit trade include diamonds, emeralds, sapphires and rubies. Precious metals vulnerable to illicit trade include gold, silver, platinum and platinoid metals. In 2016, UNEP and INTERPOL estimate that the illegal extraction and trade in minerals is worth USD 12 billion to USD 48 billion annually.²⁵¹

Understanding corruption in the illicit trade of precious metals and gemstones

The presence of criminal groups in the mining and minerals sector drives corruption and negatively impacts stability, governance, development and the rule of law.²⁵² Corruption in this sector includes everything from customs officials facilitating cross-border smuggling to corrupt officials enabling the distribution of illegal export and mining licenses.²⁵³

As an example, the Organization of American States (OAS) reports that the spread of illegal mining in Colombia is “facilitated by high levels of economic and commercial informality, rural poverty, corruption, limited governmental presence and resources in remote mining areas, and porous international borders that are vulnerable to smuggling.”²⁵⁴ Prior to extraction, inputs to the illegal gold supply chain, including mercury, explosives, and heavy machinery, are often obtained unlawfully and smuggled across borders facilitated by bribery. Once extracted, laundering the illegal gold will often include activities such as bribing local officials, followed by corrupt customs officials facilitating the smuggling of illegal gold out of the country.²⁵⁵

Corruption and illegal trade are inextricably linked in the trade of tantalum, tungsten, tin, and gold (3TG). This illicit trade not only fuels conflict across Africa but also finances armed groups, encourages forced labor, and leads to widespread human rights abuses. Additionally, the vast profits generated from this trade provide ample opportunities for money laundering and corruption.²⁵⁶

Incidents of corruption facilitating illicit trade in precious metals and gemstones

- In Mozambique, corruption is pervasive and includes high-ranking government officials, local police, and customs agents involved in extracting bribes from miners, smugglers, and international buyers. Miners must bribe police to gain access to mines, and even worse, females are forced to submit to sex with officers guarding the deposits in exchange for access. Corrupt officers also “pilfer what rubies are unearthed when their bribes are not duly paid [and when] the gemstones are then sold [...] keeping the profits for themselves.”²⁵⁷
- In Zimbabwe, 17 constables, sergeants, and an assistant inspector were charged, convicted, and sentenced for charges associated with diamond smuggling.²⁵⁸
- At the 100-kilometer stretch of road from Mutare to Marange in Zimbabwe, police set up permanent checkpoints to restrict access and search people traveling to and from the diamond fields in Chiadzwa. Locals interviewed by Human Rights Watch stated that “they believed these restrictions were an attempt by the police to allow access to the fields only to those willing to pay off police officers”, and the bigger the bribe, the more time one was allowed and that “those able to pay bigger bribes went in first.”²⁵⁹
- In Tanzania, a tanzanite trader interviewed by ENACT said that smugglers bribe police up to USD 9,000 to gain access to the mining field where they can buy tanzanite.²⁶⁰ In the next stage, a research expert in artisanal and small-scale mining reported to ENACT that “it is near impossible for a high-value product such as tanzanite to move without the complicity of government officials and criminal networks.”²⁶¹ Finally, there is reported involvement by government officials in the smuggling of tanzanite through border points and routes.²⁶²
- Human Rights watch reports that police officers in Zimbabwe form “syndicates” with local miners, where police provided the local miners security and escort in the fields in return for a share of proceeds from selling any diamonds the local miners found.²⁶³



ILLICIT TRADE IN TOBACCO PRODUCTS

Situation

The annual value of the illicit trade in tobacco is estimated at USD 60 billion,²⁶⁴ with 1 in every 10 cigarettes and tobacco products consumed globally being illicit.²⁶⁵ Illicit trade of tobacco products robs governments of much needed tax revenue, fuels corruption and terrorism, and expands the global illegal economy, which hampers competition and free trade and subsidizes other forms of illicit trade, including drugs, arms and human trafficking.²⁶⁶

Criminals engage in many forms of illegal trade in tobacco, including contraband cigarettes, counterfeits, illicit or cheap whites, grey market cigarettes and loose tobacco,²⁶⁷ but illicit trade in tobacco generally includes “any practice or conduct prohibited by law which relates to production, shipment, receipt, possession, distribution, sale, or purchase of tobacco products including any practice or conduct intended to facilitate such activity.”²⁶⁸

This can either be:

- Illicit manufacture: cigarettes produced in legal or covert facilities and not declared to tax authorities (e.g., counterfeits of established international brands, non-duty paid production for local consumption, duty and non-duty paid production for smuggling out);²⁶⁹ or
- Illicit importation: tobacco products produced/brought in one jurisdiction and then illegally transported to another where prices or taxes are relatively higher, either for personal consumption or commercial exploitation (e.g., bootlegging and large-scale smuggling).²⁷⁰

Understanding corruption in the illicit trade of tobacco

The pervasiveness of illicit tobacco trade is largely attributable to weak governance, poor government commitment to combatting illicit tobacco, ineffective customs and tax administration, abuse of free trade zones, lack of enforcement and out-of-date regulatory frameworks to address illicit trade, as well as the presence of informal distribution channels for tobacco products.²⁷¹

However, corruption stands out as a fundamental element and facilitator of the illicit trade in tobacco products.²⁷² It can encompass bribes to customs officials to permit the cross-border movement of smuggled cigarettes, bribes to law enforcement officials to allow the operation of an illegal manufacturing facility (e.g. through the tip-off of raids), and can play a role in the process of obtaining permits and licenses from national authorities or issuing clearance documents.²⁷³ Public sector corruption by type of illicit trade in tobacco can be characterized by:²⁷⁴

- Counterfeit and unbranded: grand corruption, political corruption, and petty corruption, with large bribes paid to regulatory and law enforcement officials in the transportation phase, to tax authorities in the distribution phase, and extraterritorial corruption.

- Contraband: Petty corruption in law enforcement, customs and border guards/police.
- Illicit whites: Grand and political corruption linked to state actors' complicity in large scale manufacturing; petty corruption in port authorities, customs, police at the transportation phase and tax authorities at the distribution phase.

Incidents of corruption facilitating illicit trade in tobacco products

- High-level government officials have been implicated in multiple instances of corruption in the illicit tobacco trade. For instance, in Paraguay, former President Cartes owns a company that has been identified as a significant source of illegal cigarette manufacturing and export.²⁷⁵ Similarly, in Montenegro, the Prime Minister/former President Djukanovic was accused by Italian prosecutors of running a billion-dollar cigarette smuggling operation.²⁷⁶
- In Romania, the former head of Customs stood trial in 2015 for receiving over €900,000 in bribes from smuggling cigarettes, fuel and alcohol. 51 fellow officers were also sentenced to serve up to 5 years in prison.²⁷⁷
- In Zimbabwe, there are reports that “officials within enforcement agencies know which individuals run the major cigarette smuggling cartels but cannot act against them because of their political protection.”²⁷⁸
- South Sudanese smugglers moving cigarettes into Uganda are required to pay bribes to border/security authorities depending on the size/quantity of the merchandise they are bringing in.²⁷⁹
- In Uganda, an Elegu community leader argued that “law enforcement is carried out ‘selectively’ with respect to smuggling.” A dealer operating in the region stated that “If you are arrested with cigarettes or fuel, your goods and motorbike are confiscated, you are asked to pay fines, but then your goods are sold by the enforcement officials [URA] for their personal gain. They are in business, not law enforcement.”²⁸⁰



ILLICIT TRADE IN WILDLIFE

Situation

Illicit trade in wildlife is a serious threat to local ecosystems and the survival of endangered and vulnerable species. Valued at USD 7–23 billion annually,²⁸¹ the WWF reports that during the past 40 years there has been a 58 percent decline in vertebrate population and an 81 percent decline in populations living in freshwater systems.²⁸² Unsustainable and illegal trade in wildlife is cited as the second biggest threat to species after environmental damage.²⁸³ Like all forms of illicit trade, the illegal trade in wildlife causes “physical, societal, economic, and environmental harm,”²⁸⁴ affecting “communities, undermining economies and undercutting livelihoods that rely upon sustainable resource use.”²⁸⁵

Illicit trade in wildlife is one of the most lucrative forms of illicit international trade.²⁸⁶ The profits from wildlife trafficking are high, with the value of the byproducts increasing by multiples of 25 to 50 along the supply chain.²⁸⁷

Understanding corruption in the illicit trade in wildlife

Corruption has emerged as a clear facilitator and one of the most critical factors facilitating the illegal trade in wildlife.²⁸⁸ In jurisdictions where corruption is pervasive, bribery ensures that criminals can build informal relations with public officials and ensure the illicit movement of goods, making corruption a critical factor “in the sourcing, transfer and sale of wildlife specimens and products, as well as the laundering of the proceeds from the illegal wildlife trade.”²⁸⁹ FinCEN found that 10 percent of the wildlife trafficking-related Suspicious Activity Reports had a possible nexus between corruption activity and wildlife trafficking.²⁹⁰

The OECD highlights that “criminals reduce their exposure to risk by bribing their way out of arrests, investigations, prosecution and convictions” and that “it is commonly acknowledged that IWT could not take place on a global scale without corruption.”²⁹¹

According to U4 research, “Corruption may facilitate many of the crimes along the wildlife trade route, from poaching (e.g., illegal payments to issue hunting licenses, bribery of forest patrol officers), to trafficking (e.g., bribery of customs officials, illegal payments to issue export certificates, etc.), to law enforcement (e.g., bribery of police officers and prosecutors to avoid investigations; illegal payments to manipulate court decisions). In addition, corruption and weak regulatory frameworks may offer several opportunities enabling criminal organisations to launder the proceeds of crime.”²⁹²

According to Wyatt and Cao, the corrupt acts fall within the broad categories of bribery, patronage, diplomatic cover and permit abuse, with the corrupt actors ranging from private sector actors such as transportation employees, veterinarians, wildlife-related businesses and industries, to public sector actors such as border guards, customs agents, forest officers, game rangers, the judiciary, legislators, park rangers, police, politicians, prosecutors and regulators.²⁹³

Corruption facilitates poaching as well as the trafficking, trade, sale and supply of illegal wildlife.²⁹⁴ For poaching, bribes and extortion may play a role in the process of issuing licenses for hunting which otherwise wouldn’t be issued, offering preferential treatment by wildlife officials for friends and relatives, or forest patrols turning a blind eye to illegal/pseudo-hunting.²⁹⁵

For the trafficking, trade, sale and supply of illegal wildlife, the corrupt acts include (i) bribery to ensure the issuance of export notification documents in contravention of domestic legislation or the CITES Convention’s provisions; (ii) accepting or authorizing the exported shipment; (iii) bribery at each border control; (iv) illegal payments for officials to turn a blind eye to export irregularities (e.g., fraudulent documents, exports without permits, declarations of lower values and volumes etc.); (v) conflict of interest between regulators and wildlife trade companies; and (vi) the misuse of diplomatic immunities in contravention to wildlife regulations (e.g., members of the diplomatic corps using diplomatic sacks to transport wildlife parts).²⁹⁶

Corruption can also influence policy makers’ decisions related to wildlife protection and facilitate impunity when illegal payments ensure that traffickers avoid investigations, can obstruct justice, avoid prosecution or administrative sanctions and to obtain favorable sentences in court.²⁹⁷ Bribes can also “be made to lower-level officials, such as a clerk in the evidence room, for intentionally mishandling evidence, and thus make it inadmissible in court.”²⁹⁸

TRAFFIC provides a breakdown of how corruption facilitates different stages in the illegal wildlife trade:

Table 4: Examples of corruption facilitating different stages in the illegal wildlife trade

| STAGE IN ILLEGAL TRADE | INDIVIDUALS INVOLVED | FORMS OF CORRUPTION | EFFECTS OF CORRUPTION |
|---|--|--|--|
| Setting of policy and legislation | <ul style="list-style-type: none"> ▶ Senior government officials ▶ Legislators | Grand corruption: <ul style="list-style-type: none"> ▶ Nepotism ▶ Cronyism ▶ Trading in influence ▶ Conflicts of interest ▶ Bribery ▶ Goodwill payments | <ul style="list-style-type: none"> ▶ Compromised decision-making on policy, legislation, resource allocation and natural resource management ▶ Enables wildlife crime and further corruption |
| Issuance of permits and licences for legal hunting, fishing, logging or other collection of wildlife | <ul style="list-style-type: none"> ▶ Senior officials in wildlife or forestry agencies ▶ Other officials and managers responsible for issuing documentation | Document fraud: <ul style="list-style-type: none"> ▶ Forgery, theft or illegal duplication ▶ False declarations with or without knowledge of officials ▶ Bribery ▶ Favouritism | <ul style="list-style-type: none"> ▶ Enables poaching, illegal logging and illegal collection of wildlife ▶ Illegally collected wildlife may appear to have been gathered legally |
| Poaching, illegal logging, illegal fishing and other illegal collection of wildlife | <ul style="list-style-type: none"> ▶ Wildlife wardens, forest and park rangers | <ul style="list-style-type: none"> ▶ Turning a blind eye ▶ Participating in poaching and other illegal activities ▶ Document fraud ▶ Bribery | <ul style="list-style-type: none"> ▶ Protected species are removed from the wild ▶ Possible local extinction of species of wildlife ▶ Cascade effects |
| Transportation and export/import of illegal wildlife products | <ul style="list-style-type: none"> ▶ Inspectors at checkpoints ▶ Border officials ▶ Customs officials | <ul style="list-style-type: none"> ▶ Turning a blind eye ▶ Concealing shipments ▶ Bribery ▶ Document fraud | <ul style="list-style-type: none"> ▶ Illegally collected wildlife passes checkpoints ▶ Illegal wildlife enters foreign markets ▶ Illegal wildlife may appear to be legally exported ▶ Possible spread of disease |
| Sale of illegal wildlife products | <ul style="list-style-type: none"> ▶ Police ▶ Inspection agencies | <ul style="list-style-type: none"> ▶ Document fraud ▶ Turning a blind eye ▶ Collusion ▶ Bribery | <ul style="list-style-type: none"> ▶ Wildlife is sold illegally either openly or covertly exported ▶ Possible spread of disease |
| Investigation and prosecution of wildlife criminals | <ul style="list-style-type: none"> ▶ Police ▶ Wildlife wardens and rangers ▶ Prosecutors ▶ Judges ▶ Government officials with improper influence over judicial and prosecutorial services | <ul style="list-style-type: none"> ▶ Failures to investigate ▶ Tip-offs for investigations ▶ Losing evidence ▶ Delaying cases ▶ Releasing suspects ▶ Imposing low penalties or not imposing penalties ▶ Bribery | <ul style="list-style-type: none"> ▶ Protected species are removed from the wild ▶ Possible local extinction of species of wildlife ▶ Cascade effects |

Source: WWF/TRAFFIC. (2015). *Strategies for fighting corruption in wildlife corruption: a primer*. n.p.: WWF and TRAFFIC Wildlife Crime Initiative. https://www.traffic.org/site/assets/files/9025/wci_strategies_for_fighting_corruption_wildlife_conservation.pdf. p. 15.

Incidents of corruption facilitating illicit trade in wildlife

- In Tanzania, the Environmental Investigation Agency (EIA) reports that “corruption is a key enabling factor at every stage of the ivory trafficking chain: from game rangers who provide information on patrol patterns and the location of elephant herds, to police officers who rent out weapons and transport ivory, to the Tanzanian Revenue Authority officers who allow shipping containers of ivory to flow out of the country’s ports.”²⁹⁹ There are also reports from Tanzania that “collusion between corrupt officials and criminal enterprises explains the unprecedented scale of poaching and ivory smuggling in the country.”³⁰⁰ In 2014, 21 game rangers were fired for working together with poachers,³⁰¹ and local game rangers, members of parliament and police were reported to be involved in the illegal ivory trading in the Selous area reserve.³⁰²
- In the United States, members of an international primate smuggling ring were charged in 2022 with multiple felonies for bringing wild long-tailed macaques into the country. The indictment alleged that two of the defendants owned and managed a series of corporations that conspired with black market⁹⁴ collectors and corrupt officials in Cambodia to acquire wild-caught macaques and launder them through the Cambodian entities for export to the U.S. and elsewhere, falsely labeling them as having been bred in captivity. This was facilitated by corrupt official in the CITES authority in Cambodia and the Ministry of Agriculture, Forestry and Fisheries (MAFF) to deliver wild-caught macaques taken from national parks and protected areas in Cambodia. Once the macaques were taken to breeding facilities, they were provided false CITES export permits. In return, the MAFF officials received cash payments.³⁰³ Each defendant faces up to 5 years in prison on the charge of conspiracy and up to 20 years imprisonment on each of the smuggling charges, in addition to potential fines.
- In 2015, the head of the CITES Management Authority of Guinea was arrested for his suspected role in corrupt and fraudulent actions in the issuance of CITES export permits for apes between 2009 and 2011.³⁰⁴
- In Kenya, a wildlife protection and trafficking assessment by TRAFFIC³⁰⁵ found that corruption, especially in the transportation industry, was among the key drivers and enablers of the poaching and illegal trade in rhinos and elephants there. One case included a transporter and a Kenya Revenue Authority official charged in connection with a seizure of 511 pieces of ivory in 2015, exported from Mombasa.³⁰⁶
- In South Africa, a former police officer led a rhinoceros horn syndicate involving 12 individuals operating in the country. The accused unlawfully hunted and dehorned rhinoceros and sold approximately seven rhinoceros and 14 horns for profit. They also bribed a park official to not arrest members of the syndicate.³⁰⁷
- In 2017, eight individuals – including two police officers – were convicted by Tanzania’s High Court for illegal possession of 70 ivory tusks, worth approximately USD 370,000, and for “intentionally promoting and furthering the objectives of a criminal organisation by acquiring and possessing” the tusks. In addition to prison sentences, they were ordered to pay substantial fines.³⁰⁸

- Research has shown that on a daily basis, tens of thousands of dollars are given out in bribes along the Vietnam-China border to border officials to allow illegal ivory to cross borders.³⁰⁹
- EIA has found that naval officers and personnel from both China and Tanzania have accepted bribes for shipments of ivory to be transported across borders without inspection. In Tanzania, six Revenue Authority officers were arrested for allowing containers filled with ivory to be sealed and then exported out of Tanzania.³¹⁰
- In several countries, there are reports of corrupt involvement in the theft of seized wildlife products from the wildlife management authority and police storerooms. This includes a theft of 1.35 tons of ivory from Uganda’s Wildlife Authority storerooms in 2014, the disappearance of 3 tons of ivory in Zambia 2012, and the theft of over 30 pieces of ivory tusk from a Zambia Wildlife Authority (ZAWA) storeroom in Livingstone in 2014.³¹¹ These thefts could only have occurred as a result of high-level corruption.³¹²
- Viet Nam’s Mong Cai City is one of the largest known international crossings for illegal wildlife trade from Viet Nam into China. According to interviews conducted by the OECD, corruption is one of several ways to get goods through border checks, including to personally bribe or pay-off border officers; or use a local “Kingpin” that arranges broader protection from regional officials at a higher level.³¹³

IV. CONCLUSIONS

The objective of this report is to strengthen capabilities to combat illicit trade by demonstrating that corruption is a significant factor in the facilitation of illicit trade. It presents correlations between corruption, criminal activity and government policies to mitigate illicit trade, categorizes specific types of corruption that occur in illicit trade, and delineates trends and specific cases that illustrate the manifestation of corruption in illicit trade across multiple sectors including agrifoods, alcohol, fishing, forced labor, logging, wildlife, pharmaceuticals, pesticides, precious metals and gemstones, tobacco products, petroleum, and consumer products vulnerable to counterfeiting and piracy.

Clearly, there is a deep intersection between corruption and illicit trade, with a long typology of corrupt actions emerging as primary facilitators of illicit trade. Moreover, it is evident that no sector vulnerable to illicit trade is immune from the effects of corruption, especially where there are readily available profits to be made, enabling criminal schemes to remain undetected across borders, and helping offenders evade the consequences of illicit trade.

As long as illicit trade persists as a significant part of global commerce, it will be critical to fortify policies and controls to prevent corruption and corrupt actors from compromising the integrity of the global supply chain.

Policy recommendations

Based on the findings of this report, TRACIT has formulated a set of policy recommendations to promote a more intensive focus on eliminating corruption as a leading solution to stop illicit trade. These recommendations provide a “checklist” of fundamental measures that governments are encouraged to implement to improve their ability to defend against the wider societal harms of illicit trade, with a particular emphasis on addressing the enabling role of corruption in perpetuating illicit supply chains.

If countries are to meet their UN Sustainable Development Goals, with a specific focus on goal 16.5 (substantially reduce corruption and bribery in all its forms),³¹⁴ it will be crucial to prioritize the fight against illicit trade and its associated crimes of corruption.

The following recommendations are presented as a guide for governments:

Treaties, laws and policies

Enforce the provisions of existing international legal instruments addressing both corruption and illicit trade

International treaties are a source of guidelines and legally-binding standards to drive national action and international cooperation. Given the transnational nature of illicit trade, treaties play a critical role in facilitating information-sharing for law enforcement purposes and providing common terminologies and concepts to ensure coordination by countries with different legal and institutional systems.

Consequently, all governments are urged to ratify, adopt and enforce the provisions of existing anti-corruption treaties, including notably: (i) OECD's instruments on integrity and corruption, (ii) the UN Convention against Corruption, and (iii) the recommendations of the Financial Action Task Force, especially in relation to actions aimed at preventing the laundering of proceeds of corruption and confiscating those proceeds.

Furthermore, domestic laws and regulations need to be aligned with these treaties. Countries should also ensure maximum support for, and engage proactively within, such peer review initiatives as the Inter-governmental Review Mechanisms for the UN Convention Against Corruption.

Intergovernmental organizations active in the anti-corruption and illicit trade spaces could consider developing a multi-stakeholder action plan on corruption in illicit trade, taking into consideration existing government regulations and enforcement efforts, initiatives from the business community, and input from civil society stakeholders.

Effectively leverage domestic criminal justice systems to tackle corruption

On-the-ground anti-corruption capacities urgently need to be strengthened, which will require serious, committed top-down support to national and regional monitoring, control and surveillance centers and implementing agencies. Furthermore, crimes associated with corruption and illicit trade related offences should – if not already the case – be criminalized and be listed as serious crimes under domestic law.³¹⁵ Clear prosecutorial and sentencing guidelines need to be established that emphasize the grave nature of these offences.

Adopt and enforce robust agency-specific measures to uphold transparency, integrity and ethical conduct

An anti-corruption regime that mitigates abuses of position and sets clear rules and administrative procedures to mitigate and reduce incentives to engage in corrupt behavior is essential – both at-large and in relation to illicit trade. The following are key actions that should be considered by individual agencies to enhance transparency and integrity in their operations:

- To the extent possible, streamline and automate permit and licensing processes and controls, as the elimination of the use of paper documentation reduces human contact and associated opportunities to engage in corrupt practices.
- Strengthen prevention by implementing and enforcing strong codes of conduct and regulating matters related to conflict of interests and asset declarations for public officials.
- Invest resources around the concept of continuous, career-long training on ethical conduct for public officials. For example, regarding the inter-institutional teams established in the framework of UNODC's AIRCOP Program, a high level of attention is devoted to ethics-based trainings to ensure the "alignment" of the various team members in relation to integrity matters.
- Ensure a robust reporting system of wrong-doing and provide adequate protections for whistleblowers against all forms of retaliation.

- Establish and ensure the proper functioning and independence of agency-specific units in charge of internal investigations for breaches of codes of conduct and other legal instruments, followed by the possibility to launch fair and effective disciplinary proceedings.
- Set up specific criteria and procedures for the selection, training and vetting of candidates wishing to join public agencies vulnerable to corruption and illicit trade by, for example, carrying out background checks on new personnel and existing employees (e.g., verify criminal records).
- Establish clear case management and standing operating procedures (SOPs) to reduce agencies' vulnerability to corruption and other forms of integrity-related misconduct. In this context, for example, the careful definition of access rights and procedures should be a key component of SOPs applicable to the work of customs and border agencies. Examples can be found in maritime container inspection SOPs, which should clearly address:
 - Who is responsible for targeting containers and decides whether to inspect them?
 - What is the process for getting hold of the container and having it unloaded?
 - Who performs inspections? Where do they take place and how?
 - Who has to attend and/or be informed of the inspection?
 - What tools and equipment are to be taken to the examination site and who is in charge of the stock of toolkits and equipment?

Rotation policies ports, borders, or in offices charged with monitoring for environmental crimes should be considered as critical tools to reduce corruption risks.

Implementation and enforcement

Elevate the importance of combatting illicit trade

The premise of this report is that corruption and illicit trade are deeply interconnected. Combating illicit trade will require stronger controls to prevent corruption, and likewise it follows that progress on the anti-corruption agenda can be advanced if regulators prioritize the wide portfolio of measures to stop illicit trade.

However, this will require governments to approach corruption and illicit trade more holistically, with an all-of-government approach. It will also require governments to elevate punitive damages associated with the crimes of illicit trade and the crimes of corruption. Only when criminals fear substantial penalty, will they deter. Government officials at all levels must prioritize the problem, actively pursue solutions and invest in enforcement measures. A clear example can be found in the case of illegal wildlife trade, where OECD reports that "the perception of illegal wildlife trade among the anti-corruption authorities interviewed is that wildlife crimes are a lower priority in comparison with other corruption scenarios, [meaning that] in many cases, public corruption involving illegal wildlife trade does not meet the criteria set by administrations to trigger investigations into alleged corrupt acts."³¹⁶

Include anti-illicit trade policies as integral components of national plans to combat corruption

As corruption and illicit trade related offences are mutually reinforcing, governments should proactively include illicit trade controls into the anti-corruption sphere. When governments go about formulating policies and implementing programs to combat corruption, efforts to mitigate illicit trade need to be factored in.

Implement cross-cutting operational approaches to fighting corruption and illicit trade

With the objective to maximize the public welfare benefits of reduced illicit trade, governments should pursue cross-cutting approaches to fighting corruption as it occurs in illicit trade. This starts with establishing a national-level joint task force that would convene anti-illicit trade and anti-corruption experts, build cooperation with the private sector to help expose corruption in illicit supply chains, and shift the risk-versus-reward to an increased likelihood that crimes of corruption and illicit trading will face swift prosecution and heavy deterrent penalties.

Conversely, a lack of inter-agency collaboration and information exchange can result in unclear institutional responsibilities, which creates gaps in enforcement that can be exploited by illicit traders seeking to collaborate with corrupt public officials.

Governments should: (i) increase coordination across agencies responsible for law enforcement, tax collection, security, intellectual property rights, and customs; (ii) increase information exchange among law enforcement authorities (e.g., police, customs, immigration, inspection, health agencies); and (iii) increase cooperation between investigative authorities and *Financial Intelligence Units* in the fight against money laundering and in upholding financial investigations.

Ensure a strong customs environment

Customs and other border control agencies have a critically important role in combating cross-border illicit trade, largely because their officers have front-line responsibility for conducting inspections and detecting and seizing illicit goods. However, this level of authority creates ample opportunities for corruption that merit targeted anti-corruption controls.

If the role of a customs agency is compromised, the system fails and presents vulnerabilities for illegal trade, criminal activity, illegal financial flows, and trafficking in products and persons. Promoting a better customs environment through enhanced public-private dialogue in cross-border processes can create significant benefits for society.

Take proactive measures to prevent illicit trade and corrupt practices in Free Trade Zones

Free Trade Zones have emerged as a notorious vulnerability in the global supply chain, enabling the facilitation of illicit trade in many sectors. WWF highlights this weakness with respect to illegal wildlife trade passing through FTZs in reporting “the focus on the economic gains from lighter regulation and reduced customs presence in such zones has meant that guidance on countering illicit and corrupt practices has often been overlooked in their operations”, and that “they have become particularly prone to corrupt practices that facilitate a wide range of criminal activities, including wildlife trafficking.”³¹⁷

In the case of FTZs, greater supervision over zone operators can prevent acts of corruption that impede inspections of shipments into and out of FTZ or cover up illicit goods stored and services conducted in zones. Other anti-illicit trade measures can complement these anti-corruption controls, including risk profiling of suspect shipments, closer inspection of shipments by known offenders, and providing Customs with ex-officio powers to inspect goods stored and services conducted in zones. Additionally, customs supervision of the zone perimeter and entry and exit points along with strong “Know Your Customer” and “Due Diligence” policies can mitigate corruption and illicit activities. A useful guide for address these issues is the OECD Working Party on Countering Illicit Trade’s *Code of Conduct for Clean Free Trade Zones*.

Supporting environment

Support and protect a free press

A free and independent press plays a crucial role in detecting and exposing instances of corruption and illicit trade, thereby increasing transparency and accountability of public officials and fighting against impunity. Governments should ensure that journalists are free to report on cases of corruption and illicit trade without fear of retaliation or censorship. To this end, governments should ensure laws protecting freedom of the press, including whistleblower protections and laws allowing journalists to protect their sources.

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