



NGO recommendations for the identification of priorities under the new EMPACT Policy Cycle (2026-2029)

The Council of the European Union will soon adopt its *Conclusions on the enhancement of EMPACT and on EU crime priorities for the next EMPACT cycle 2026-2029*. As a coalition of environmental, conservation, and animal protection organisations concerned with the rise in environmental crime, and more specifically, wildlife trafficking, we would like to share our recommendations to inform the current decision-making process.

Environmental crime is the third most lucrative crime category globally, with illegal logging, illegal fishing and illegal wildlife trade alone being valued [at least USD1 trillion per year](#). The detrimental impacts of these crimes on the environment and human health are well documented. However, beyond these visible harms, environmental crime also carries serious, and often overlooked, consequences for our security and economy, driven by the involvement of organised crime groups, corruption, and the infiltration of legitimate markets by illicit actors. All of these undermine the EU's international commitments and objectives related to the green transition, security and competitiveness.

Among the different forms of environmental crime, wildlife trafficking, which encompasses fauna (terrestrial and aquatic, such as illegal fishing) and flora (including timber, medicinal and ornamental) species, is particularly harmful. The EU is a major source, transit and destination region for wildlife commodities globally. Every year, thousands of wildlife specimens and products are [seized by authorities](#), yet [few seizures lead to actual prosecutions and most wildlife crime cases are simply never detected](#). These crimes affect European species, such as European eels, which [Europol](#) qualifies as one of the most substantial and lucrative forms of illegal wildlife trade globally and estimates at EUR3 billion in peak years. However, wildlife trafficking also affects numerous species from other regions of the globe, which are smuggled into the EU either en route to other destinations or to meet consumer demand within the Union. Yet, wildlife trafficking is perceived by traffickers as a low-risk, high-reward business as it generates high profits, assets are rarely recovered, and risks of detection and sanctions are low. Failure to address these crimes in Europe directly undermines other regions' efforts for conservation and the sustainable use of natural resources. Due to the transnational nature of wildlife trafficking and the low risk of detection/sanctions, organised crime groups also capitalise on the illegal wildlife trade, especially for high-value species (e.g. European eels, precious timber, etc.). Finally, the private sector often facilitates illegal wildlife trade, knowingly or otherwise, in particular when it comes to [transport and logistics, courier services, financial institutions, online platforms](#), or businesses directly trading in wildlife.

Environmental crime, including wildlife trafficking, is featured in the latest [Serious and Organised Crime Threat Assessment](#) (SOCTA) of Europol, which highlights the large-scale and evolving nature of the threat posed by these crimes. It also underscores that the use of digital platforms as marketplaces for wildlife trafficking continues to grow, while traffickers constantly adapt to enforcement pressures by shifting their focus to different species to avoid detection. This includes non-CITES-listed wildlife, which traffickers have been increasingly turning to, to avoid law enforcement attention. The importance of tackling environmental crime is also acknowledged in the recently adopted EU Internal Security Strategy “[Protect EU](#)”. Yet, the lack of data and reporting significantly affects the ability of competent authorities and other relevant stakeholders to effectively understand and stop these crimes. With the adoption of the new Directive on the protection of the environment through criminal law ([Directive 99/2008/EC](#)), the EU should be better equipped to address these crimes, with Europol being clearly identified as a key agency to support Member States' efforts in that task. In parallel, the [EU Action Plan Against Wildlife Trafficking](#) (2022-2027) also specifically identifies Europol and EMPACT as essential to achieve the objectives identified in the Plan, in particular with regard to strengthening the legal and policy framework against wildlife trafficking and enforcing regulations and policies to fight wildlife trafficking effectively.

Environmental crime, with a specific focus on waste and wildlife trafficking, has been a priority under EMPACT since 2018. This ensured the leadership role in coordinating EU action against environmental crime, including wildlife trafficking, through a multi-stakeholder approach involving, among others, relevant law enforcement agencies from all EU Member States (police, customs, inspectorates), EU agencies, International Organisations and NGOs. This, in turn, led to positive developments and supported key operational activities such as [Operation LAKE](#). By being identified as a priority under EMPACT, environmental crime and wildlife trafficking have also been prioritised through the allocation of EU funding, especially under DG-HOME's Internal Security Fund. This has enabled the development of dedicated and successful projects, such as the [UNITE project](#), which have increased the knowledge base on environmental crime, including for competent authorities, and supported operations on the ground.

RECOMMENDATIONS

Given the growing threat posed by environmental crime, particularly wildlife trafficking, and the persistent gaps in awareness, knowledge and resources, **we urge you to support the inclusion of *wildlife trafficking* as an area of focus under the environmental crime priority of the next EMPACT policy cycle**. If this issue is overlooked, the effective implementation and enforcement of relevant EU legislation and policies will be jeopardised, weakening the EU's international commitment to fight wildlife trafficking and protect biodiversity.