

*Mr. Michael McGrath, EU Commissioner for Justice and Consumers*

*Ms. Jessika Roswall, EU Commissioner for Environment, Water Resilience and a Competitive Circular Economy*

*The Governments of EU Member States*

Brussels, April 2026

## **OPEN LETTER: TIME FOR EUROPEAN LEADERSHIP ON A GLOBAL AGREEMENT AGAINST ENVIRONMENTAL CRIMES**

As **103 organizations** working to prevent and combat environmental crimes across the European Union (EU) and beyond, we are writing to urge the EU to seize a historic opportunity to strengthen the international response to environmental crimes, including by supporting the development of an additional Protocol to the United Nations Convention against Transnational Organized Crime (UNTOC).

In late February 2026, the international community gathered in Vienna for the **second meeting of the Intergovernmental Expert Group on Crimes that Affect the Environment under the UNTOC**. This meeting represented a landmark moment, with approximately 100 States represented by national experts and diplomats to address some of the world's most pervasive and destructive forms of transnational organized crime. While the level of participation was unprecedented, the outcome was disappointing. Despite three days of intense deliberations, which had been prepared for over previous months, the meeting concluded with no outcome: **none of the eight proposed recommendations for enhanced multilateral action were adopted**.

While some organizations were in Vienna to monitor these developments, civil society was regrettably unable to formally participate in the expert-level negotiations. From the margins of the discussions, what emerged was that a **well-coordinated minority of non-EU States managed to successfully frustrate progress**. We are grateful for the clear and decisive contributions of some EU Member States in the discussions; however, the leadership of individual countries cannot substitute for the collective influence and power of an unequivocal, unified EU position. In the lead-up to the UNTOC Conference of the Parties, in October 2026, we hope that the EU will take a clearer and stronger position, reflecting its existing policies and priorities, and the collective weight it can bring to these discussions.

As many experts emphasized during the meeting, the technical arguments for an additional Protocol under the UNTOC are no longer just academic: they are operational necessities. The absence of common global definitions for environmental crimes such as wildlife trafficking, illegal deforestation, illegal mining, illegal fishing, and waste trafficking continues to create **loopholes that organized criminal networks readily exploit**. Without an international legal framework establishing minimum common standards and definitions, international cooperation is frequently constrained by the absence of dual criminality, hindering extradition and the provision of mutual legal assistance.

A global instrument would help address these challenges while reinforcing the ambition reflected in the EU's own legal framework, including the EU Environmental Crime Directive and the Council of Europe Convention on the Protection of the Environment through Criminal Law. The EU has already committed to strengthening the international legal framework in this area. The revised EU Action Plan against Wildlife Trafficking (2022–2027) identifies 'promoting the

adoption of a protocol covering wildlife trafficking under the UNTOC' as a specific action. Extending such a protocol to cover a wider set of crimes that affect the environment would be consistent with the EU's existing legislation, policy commitments and strategic direction. Crucially, an additional Protocol **presents a unique opportunity for the EU to ensure its ambitious standards are extended to other jurisdictions**. By leading the shift toward a more level global playing field, the EU can ensure that European businesses are no longer undercut by competitors operating in regions where environmental crime is met with weaker legislation or more lenient enforcement.

With a draft resolution expected to be tabled at the UNTOC Conference of the Parties in October 2026 – seeking to start negotiations on an additional Protocol - the window for decisive action is narrowing. We therefore call on the European Commission and the governments of EU Member States to urgently work towards a **strong, well-coordinated EU position and to engage proactively with international partners to initiate negotiations for an additional Protocol without delay**. The natural world does not recognize international borders, and neither do transnational criminal groups, so our legal frameworks can no longer afford to be fragmented while organized crime remains so efficiently globalized.

We must move beyond fragmented responses to a unified global approach that ensures the safety of our communities, fairness for our businesses, and a healthy environment for generations to come.

The EU's leadership in calling for change, alongside partners from the Global South, will be vital to achieving progress.

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On behalf of:



AAP Animal Advocacy and Protection



Aaranyak



Action4Justice



ADM Capital Foundation



African Conservation Trust



Albanian Fiscal and Economic Research Center



Amazon Watch



Ambiendura



ANI Foundation



Anti-Fraud Initiative Ghana (AFIG)



Asian Research Institute for Environmental Law



Asociación Rescate y Conservación de Vida Silvestre (ARCAS)



Association of Zoos and Aquariums' Wildlife Trafficking Alliance



Association Tunisienne de Taxonomie



AWTAD Anti-Corruption Organization



Big Cat Rescue



Blueprint for Free Speech



Born Free Foundation



Canadian Environmental Crime Research Network



CATCA Environmental and Wildlife Society (CEWS)



Centre for Development and Democratisation of Institutions



Cheetah Conservation Fund



Children and Young People Living for Peace (CYPLP), Nigeria



Club Ohada THIES



Conservation Justice



Conservatoire pour la Protection des Primates



Corporacion Viso Mutop



Criminologists Without Borders



DARIDIBÓ (Guinea Bissau)



Eagle Eye Transparency And Integrity Initiative (EETAI)



Earth League International (ELI)



Elephanatics Foundation Conservation Education Action



Environmental Crime and Corruption Working Group of the Global Civil Society Coalition for the UNCAC



Environmental Investigation Agency UK



Environmental Investigation Agency US



Eurogroup for Animals



European Environmental Bureau

The Fast Forward Foundation



Forests of the World



FOUR PAWS



FREELAND



Frontida Zois Initiative (FZI)



Fundación Internacional para la Restauración de Ecosistemas (FIRE)



Future for Elephants e.V.



GEOBON, University of Melbourne



Global Initiative against Transnational Organized Crime



Global Initiative to End Wildlife Crime



Global March for Elephants and Rhinos



Greenhood Nepal



Humane World for Animals



Igarapé Institute



Institute for Nature Conservation in Albania



Intelligent Whistleblower Coalition Bangladesh



International Council of Environmental Law



International Fund for Animal Welfare (IFAW)



International Ranger Federation



The International Wildlife Trust



IUCN SSC PSG Section on Small Apes



Jane Goodall Institute Argentina



Jane Goodall Institute Belgium



Jane Goodall Institute France



Jane Goodall Institute

Jane Goodall Institute Global



Jane Goodall Institute Italia



Jane Goodall Institute Spain



Just Access e.V.



Law of the Wild



Legal Atlas, LLC



Liberia Chimpanzee Rescue & Protection

**THE LONG RUN**

The Long Run



Michael O'Connell AM APM, Consulting Victimologist



NGO Shipbreaking Platform



Pan African Sanctuary Alliance



Panthera



Peace Parks Foundation



Peruvian Society for Environmental Law (SPDA)



Plateforme DPEG



Policy Alert



Pro Wildlife



Resource Justice Network (RJN) Nigeria



Robin des Bois



Royal Society for the Prevention of Cruelty to Animals



Sensitisation Against Hazard and Crime Initiative (TNCSAHACRIN)



The Siracusa International Institute for Criminal Justice and Human Rights



Soroptimist International



Species Survival Network



Species360



Spotlight on Corruption



SPOTS Foundation



Stakeholder Forum for a Sustainable Future



Sustainable Eel Group



Toronto Zoo



Tripla Difesa O.N.L.U.S



Uniting Church in Australia, Synod of Victoria and Tasmania



Wild at Life e.V.



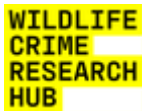
Wild Tomorrow



WildAid



Wildlife Conservation Society EU Office



Wildlife Crime Research Hub, Adelaide University



Wildlife Justice Commission



Wildlife Protection Society of India (WPSI)



Women and Modern World Center - CWMW Azerbaijan



World Elephant Day & World Elephant Society



Zoologischer Garten Berlin AG