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IUCN comments on draft resolution: *Enhancing international response to address crimes that affect the environment*

IUCN welcomes this draft resolution on *Enhancing international response to address crimes that affect the environment* and commends the governments of Peru and Kenya for placing this urgent issue on the global environmental agenda, as well as Member States for their commitment to strengthening collective action against crimes that affect the environment.

The draft resolution is timely, consistent with recent developments under UNTOC, and directly relevant to achieving global environmental, climate and sustainable development objectives. It also aligns closely with UNEA's mandate to reinforce environmental governance and complements ongoing efforts under UNTOC, UNCAC, CITES, CBD and other multilateral environmental agreements (MEAs).

IUCN offers the following comments and suggestions to help reinforce ambition, strengthen environmental outcomes, and ensure clarity of scope and rights-based approaches. Additions are in bold.

Preambular paragraphs (PP)

PP3 (new)

Suggested text:

Recalling further resolutions of the United Nations Commission on Crime Prevention and Criminal Justice (CCPCJ), the United Nations Convention Against Corruption (UNCAC) and the United Nations Convention Against Transnational Organized Crime (UNTOC), in particular CCPCJ Resolutions 31/1 of 20 May 2022 on Strengthening the international legal framework for international cooperation to prevent and combat illicit trafficking in wildlife, and 34/8 of 23 May 2025 on Tackling illicit trafficking in wild fauna and flora, including timber and timber products, the illegal mining of and illicit trafficking in minerals and precious metals, the illicit trafficking in waste and other crimes that affect the environment.

Rationale:

As the resolution is discussing both UNEP and UNODC, it seems logical to reference relevant resolutions under UNEA but also related to UNODC mandates (UNTOC/UNCAC/CCPC) to strengthen the crime framework

PP6 (amended)

Suggested text:

Noting with concern that the activities of organized criminal groups involved in crimes that affect the environment, including in countries of origin, **transit, and destination, and involving activities affecting forests, wildlife, minerals, fisheries, and waste**, hinder and undermine efforts by States to protect the environment and achieve sustainable development, and disproportionately impact vulnerable communities and indigenous peoples, **and environmental human rights defenders**,

Rationale:

Organized environmental crimes affect multiple sectors of natural resources and ecosystems, exacerbate climate change, and compromise sustainable development. Including transit countries and sectors beyond wildlife ensures a comprehensive scope, while acknowledging vulnerable communities and environmental defenders highlights social and human rights dimensions.

PP7 (new)

Suggested text:

Recognising that crimes that affect the environment exacerbate environmental degradation, climate change, pollution and biodiversity loss, which constitute some of the most pressing and serious threats for present and future generations in terms of health, governance, rule of law, national security and socio-economic development, thereby hindering efforts to implement the 2030 Agenda for Sustainable Development and undermining relevant Multilateral Environmental Agreements (MEAs), including CITES, CBD, and Basel and Minamata Conventions, as well as the Paris Agreement and the Kunming-Montreal Global Biodiversity Framework,

Rationale:

Explicitly linking environmental crimes to climate change, biodiversity loss, pollution, and international agreements underscores the urgency of international cooperation. It reinforces that these crimes are not only legal issues but also major environmental and development challenges affecting global commitments under the SDGs, MEAs, and other frameworks.

PP8 (new)

Suggested text:

Recognising also that, owing to their commonly transnational nature, crimes that affect the environment necessitate an equally organised and global response through cooperation and coordination among stakeholders and the inclusion of non-traditional actors, and *further recognizing* that significant take and trade occur domestically in many countries,

Rationale:

Environmental crimes are often transnational but also occur domestically, and effective responses require coordinated, multi-stakeholder action. Including States, civil society, Indigenous Peoples, local communities, and non-traditional actors ensures an inclusive, multi-sectoral approach that strengthens enforcement, prevention, awareness, and capacity-building. This paragraph concludes the preambular section by presenting a clear framework for national and international action to address environmental crimes comprehensively.

Operative paragraphs (OP)

OP1 (amended)

Suggested text:

1. *Acknowledges* that crimes that affect the environment are a serious threat to advancing **environmental protection, biodiversity conservation, climate action**, and the Sustainable Development Goals for a safer and more resilient planet,

Rationale:

Explicit referencing biodiversity conservation and climate action clarifies the scope of the threat and emphasizes that these crimes hinder progress toward the SDGs and the broader objective of a safer, more resilient planet.

OP2. *Encourages* Member States to intensify actions against corruption, money laundering, and other related illegal activities linked to crimes that affect the environment, and to facilitate the recovery and restitution of illegally obtained assets and proceeds from these crimes, as well as any financial compensation to the affected States, in order to support their national efforts in environmental restoration and conservation, and to strengthen their national capacities to combat such crimes and to promote demand reduction in countries of destination of illegal trafficking,

Comment:

IUCN welcomes the focus on corruption, money laundering, and asset recovery. To strengthen effectiveness, IUCN suggests (i) adding explicit reference to financial crime, and (ii) highlighting the role of non-State actors, including the private sector and financial institutions, in due diligence and risk mitigation.

OP3 (amended)

Suggested text:

3. *Urges* Member States to strengthen their legislation, public policies, strategies and multi-agency coordination, and to provide technical and mutual legal assistance in order to actively contribute to **preventing and combating crimes that affect the environment, and to adopt and implement effective measures, including by enhancing the implementation of the UNTOC, the UNCAC and other relevant international agreements; reinforcing international cooperation; applying sanctions proportionate to environmental harm; promoting whistleblower protection and incentives; and integrating Indigenous Peoples' knowledge and community-based monitoring systems.**

Rationale:

This amendment links national action to UNTOC, UNCAC, and other relevant agreements. It highlights the need for comprehensive measures to prevent and combat CAE, including proportionate sanctions, whistleblower protection, and incentives to support accountability and early detection. Integrating Indigenous Peoples' knowledge and community-based monitoring ensures a rights-based and inclusive approach.

OP8 (amended)

Suggested text:

8. *Invites* Member States to continue working with UNEP and UNODC to develop model legislation, improve international cooperation, and enhance data collection and enforcement capacity, **aligned with existing instruments and relevant MEAs.**

Rationale:

This addition clarifies that national efforts should align with existing international instruments, ensuring coherence, avoiding duplication, and reinforcing obligations under MAEs and conventions such as CITES, CBD, and Basel.