



INTERPOL

Final Operational Report



INTERPOL

OPERATION 30 DAYS AT SEA TACKLING MARINE POLLUTION CRIME



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Norad

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FOREWORD

Operation 30 Days at Sea was the tactical phase of the INTERPOL Global Marine Pollution Enforcement Project. It was coordinated by INTERPOL through its Environmental Security Programme, under the Organized and Emerging Crime Directorate.

The Executive Board of the INTERPOL Pollution Crime Working Group (PCWG) was instrumental to the successful preparation and execution of this Operation. Board Members provided strategic advice and senior expertise to deliver key investigative guidance material to member countries and to support capacity building in the pre-operational phase.

INTERPOL acknowledges the fruitful cooperation with Europol in coordinating jointly the Operation in the European region. INTERPOL also thanks the United States Coast Guard and the United States Coast Guard Investigative Service for offering the delivery of specialized training in some regional operational planning meetings, in order to support member countries' preparations for this Operation.



“Criminals believe marine pollution crime is a low-risk crime with no real victims. This is a mistake and one which INTERPOL and our partners are addressing as demonstrated in this operation.”

INTERPOL Secretary General Jürgen Stock

EXECUTIVE SUMMARY

Marine pollution is a serious and growing threat to the environment, human security and economic development. It also provides business opportunities for transnational and organized crime to thrive, requiring international law enforcement cooperation and concerted action to tackle it. To address these threats, INTERPOL and its Pollution Crime Working Group (PCWG) coordinated Operation 30 Days at Sea in October 2018, in cooperation with Europol in the European region. It was the first global operation ever led to focus a law enforcement response to marine pollution, with the participation of 276 law enforcement and environmental protection agencies from 58 countries worldwide. As a result of 15,446 inspections conducted during the Operation, 1507 marine pollution-related offences committed on land, in internal waters or at sea were detected, 202 vessels and 76 companies were reported to INTERPOL, and 701 investigations were initiated with subsequent fines and prosecutions in numerous cases.

The Operation articulated in three phases. The pre-operational phase streamlined a strategic approach aiming at building a global operational network of relevant national and international stakeholders, coordinating through interagency cooperation domestically, and through bilateral and multilateral cooperation at the international level. The network, comprised of 122 officers coordinating the operation on their territory, developed through twelve operational planning meetings at the regional and national levels, and a series of capacity building activities. Capacity building preparations for the tactical deployment focused on enhancing intelligence gathering, detection and investigative capacities, through the country-to-country expertise sharing principle, complemented by INTERPOL technical support.

The tactical phase featured country-led operations. Intelligence-led targets primarily included vessels profiled as presenting risk indicators, as well as national seaports, territorial waters prone to illegal discharges and some strategic land-based targets. The Operation saw an extensive use of both traditional surveillance equipment, such as aerial surveillance and sea patrols, and innovative technologies including satellite imagery, drones, vessel tracking systems, and a variety of advanced IT and forensic equipment. Law enforcement cooperation was the key driver of the Operation, both at the national level through the setup of multi-agency task forces, and at the international level through bilateral and multilateral engagement in expertise sharing, intelligence exchange and investigative cooperation on several cases. INTERPOL supported national operational activities by deploying a Criminal Intelligence Officer in some countries, running checks against databases to provide real-time intelligence, and facilitating investigative cooperation among countries.

Operational results revealed that each one out of ten inspections exposed a marine pollution violation, usually presenting a transnational profile. Oil pollution accounted for half of the offences detected and were significant across all regions, followed by garbage discharges (prevalent in regions with economies in transition), sewage discharges (important in Africa and Europe), activities related to illegal plastic bags (detected in Europe), and records violations (frequent in Latin America), to name a few. Of all reported pollution offences from vessels, over 90% were detected during vessel inspections at port; while most cases from land-based targets concerned sewage treatment plants (25% of land-based offences) and facilities suspected in the illicit use of plastics (49%). The overwhelming majority of offences were administrative cases (86%). The analysis of modus operandi indicated that land-based offences were mostly deliberate, while offences on vessels (particularly oil and garbage discharges) were more likely to occur due to negligence, accident or poor conditions of on-board systems, often coupled with poor attention given to record keeping. Twelve types of vessels were reported in connection with detected marine pollution offences, with cargo ships, bulk carriers, oil and chemical tankers, and fishing vessels appearing more prone to commit such violations and each of them being linked to specific types of pollution events. Seven flag states were identified as recurrently involved in the reported pollution offences.

Finally, the post-operational phase included a global communication campaign and a global meeting. The communication campaign aimed at raising awareness on marine pollution crime and was conducted on major social media in partnership with UN Environment and Europol. The global post-operational meeting gathered all participating countries at the INTERPOL headquarters and allowed to develop common operational strategies to further marine pollution enforcement and to strengthen the global operational network.

The immediate impact of this Operation was the effective containment of sea contamination following a large number of incidents and violations in every regions of the world, along with the disruption of some illicit businesses. At the same time, the Operation generated some strategic and long-term impacts. It raised the profile of marine pollution crime in national and the international enforcement agendas, encouraging an unprecedented mobilization of law enforcers in this crime area and the development of technical capacities. It also built new cooperation mechanisms among relevant stakeholders at the national, regional and international levels, fostering a more synchronised and holistic approach to marine pollution crime globally. Moreover, the analysis of the operational results generated actionable intelligence to drive future targeted marine pollution operations.

The resulting INTERPOL strategic framework to further advance marine pollution enforcement articulates in follow-up operations, capacity building initiatives and enhancement of international cooperation.

ACRONYMS

AIS	Authorized Vessel Identification System
EFCA	European Fisheries Control Agency
EMSA	European Maritime Safety Agency
ENS	INTERPOL Environmental Security Programme
EU	European Union
EUROPOL	European Union Agency for Law Enforcement Cooperation
FRONTEX	European Border and Coast Guard Agency
MARPOL	International Convention for the Prevention of Pollution from Ships
NCB	INTERPOL National Central Bureau
NOC	National Operational Coordinator
NOP	National Operational Plan
PCWG	INTERPOL Pollution Crime Working Group

I. MARINE POLLUTION CRIME: A THREAT TO ENVIRONMENTAL, HUMAN AND ECONOMIC SECURITY

Marine pollution is a **serious and growing threat** to environmental and human security. It poses significant risks to ecosystems, public health, food security and economies, and it undermines sustainable development, as millions of people in developing countries are directly or indirectly economically dependent upon marine products.

It also **provides business opportunities for transnational and organized crime** to thrive: To avoid costs related to properly manage and dispose of pollutants for example, offenders use the sea as a dumping ground, or illegally discharge effluents on land and in internal waters, then leaking to the marine environment. Violations include illegal discharges (of oil, garbage, sewage, etc.) both at sea and on-land, dumping, oil blending, unregulated ship emissions, and shipbreaking among other offences .

Such violations are committed at the **transnational level** taking advantage of legislative gaps, logistic challenges in sea patrolling, and uneven enforcement capacities across countries. These acts may lead to the **contamination of waters and coastal land**, damaging the habitat of flora and fauna for decades, threatening marine life with extinction, and undermining the global food chain. Some plastic marine debris can persist in the marine environment for hundreds of years (INTERPOL, 2016). UN Environment estimated that by 2050 there may be more plastic than fish in the seas.

The international community has recognized the need to prevent and significantly reduce marine pollution by 2025, as reflected in the UN Sustainable Development Goals Six^[2] and Fourteen^[3]. **The law enforcement community plays a key role in meeting the growing challenge of marine pollution** and contributing to achieve these goals, through a wider mobilization of marine pollution enforcement efforts.



1) Marine pollution encompasses the entry of contaminants - such as chemicals and waste- into seas, both directly (discharges, dumping at sea and ship breaking) and indirectly (runoff from the land and waterways into the sea, and pollutants released from the atmosphere).
2) Clean water and sanitation for all – whose target 6.3 aims at eliminating dumping and minimizing release of hazardous chemicals and materials.
3) Life Below water.

II. A CALL FOR GLOBAL ACTION: OPERATION 30 DAYS AT SEA

2.1. Scope: targeting marine pollution offences globally

In order to address the complex and transnational nature of marine pollution crime, law enforcement responses must be comprehensive and internationally coordinated. To foster these responses, **INTERPOL and its Pollution Crime Working Group (PCWG) launched Operation 30 Days at Sea to be conducted on 1-31 October 2018, in cooperation with Europol in the European region.**

It was the first law enforcement operation ever led globally against marine pollution crime. It aimed at gathering relevant national enforcement and environmental protection agencies to act in concert against marine pollution, by targeting the following unlawful activities: illegal discharges from vessels and offshore platforms; ocean dumping; shipbreaking; violations of ship emissions regulations; land-based and river pollution impacting the marine environment (effluents running off to the sea).

2.2. Aim: enhancing marine pollution enforcement

The overall objective of Operation 30 Days at Sea was to enhance the global law enforcement response to marine pollution violations in breach of the International Conventions and national legislations, with the ultimate objective of improving sea quality. The specific objectives included:

- Supporting investigations to **identify, arrest and prosecute** individuals and/or companies responsible for marine pollution violations, through intelligence gathering and sharing and international cooperation;
- **Increasing the enforcement** of relevant international instruments, particularly the MARPOL Convention and its Annexes, and national legislations;
- **Strengthening law enforcement capacity, interagency coordination and international cooperation** in the field of marine pollution enforcement;
- Collecting and analysing data to **profile risk indicators, modus operandi and hotspots**, with a view to increasing early detection of marine pollution violations and developing long-term law enforcement strategies;
- **Raising the profile of marine pollution from a law enforcement perspective**, in order to integrate marine pollution in the global law enforcement priority agenda, **strengthen mandates and mobilize increased resources** to disrupt this crime more forcefully.

2.3. Timeline: an Operation in three phases

The Operation timeline was divided into three phases:

Figure 1. Operation Timeline



III. PLANNING THE OPERATION WITH 58 COUNTRIES

The pre-operational phase aimed to support countries' preparations for the Operation through the enhancement of cooperative enforcement networks at the national, regional and global levels, and through a combination of capacity building, strategic and operational planning activities.

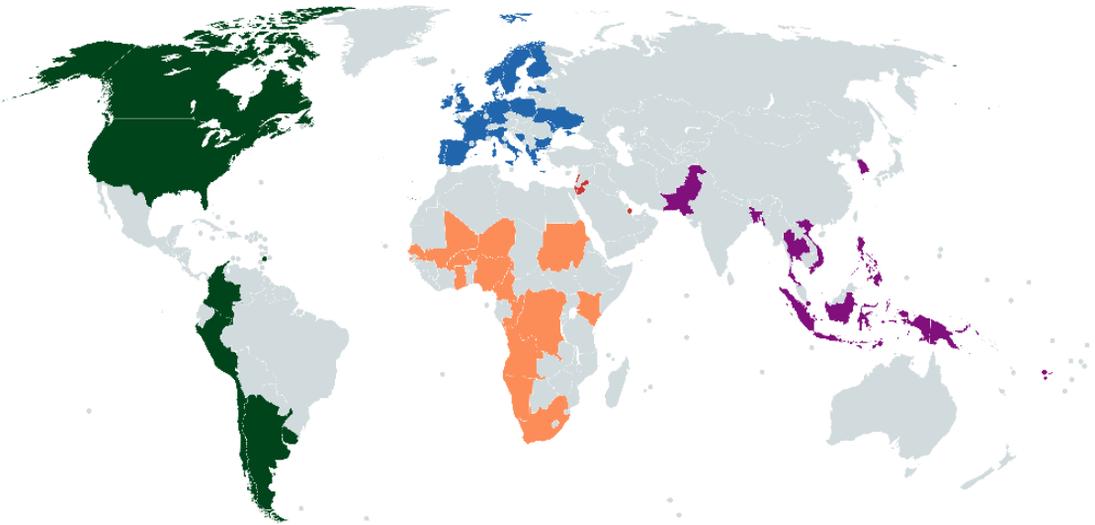
3.1. Establishing a Global Operational Network

The strategic approach to the execution of this Operation was building a global operational network of relevant national and international stakeholders, cooperating on concrete activities, along two complementary axes:

- through **interagency cooperation** at the national level, and
- through **bilateral and multilateral cooperation** at the international level.

An invitation to join the Operation was extended by INTERPOL to all its member countries, through the INTERPOL National Central Bureaus (NCBs), in February 2018. **58 countries from every regions** of the world responded positively to this call for action, **mobilizing 276 national agencies** to conduct the Operation (Figure 2).

Figure 2. Map and list of participating countries in the Operation



AMERICAS (8)

- Argentina
- Canada
- Chile
- Colombia
- Peru
- St. Vincent & Grenadines
- United States of America
- Uruguay

AFRICA (14)

- Angola
- Burkina Faso
- Cameroon
- Congo
- Democratic Republic of Congo
- Ghana
- Kenya
- Mali
- Namibia
- Niger
- Nigeria
- South Africa
- Senegal
- Sudan

MIDDLE EAST (3)

- Lebanon
- Jordan
- Qatar

EUROPE (22)

- Albania
- Belgium
- Bosnia and Herzegovina
- Bulgaria
- Denmark
- Finland
- France
- Germany
- Greece
- Ireland
- Israel
- Italy
- Latvia
- Moldova
- Netherlands
- Norway
- Poland
- Portugal
- Spain
- Sweden
- Ukraine
- United Kingdom

ASIA – PACIFIC (11)

- Bangladesh
- Fiji
- Indonesia
- Pakistan
- Papua New Guinea
- Philippines
- Republic of Korea
- Singapore
- Thailand
- Timor Leste
- Vietnam

The first steps towards establishing a global operational network were the appointment of **National Operational Coordinators (NOCs)** by participating countries and the development of the NOCs Network as a global operational cooperation mechanism specialized in marine pollution enforcement. The NOCs Network comprised of 122 officers representing 98 competent national agencies, namely police (criminal, maritime, environmental, border police forces and NCBs), environmental authorities, coast guard, maritime authorities, coastal administrations, navy and customs.

NOCs acted as the national points of contact for the Operation both domestically and internationally.

At the national level, they engaged relevant authorities in the preparation and execution of the National Operational Plan, often organizing a series of operational planning meetings sometimes coupled with specialized investigative training, to align efforts and capacities of the collaborating agencies. They also coordinated national operational activities and reported the results to INTERPOL. In many countries, these efforts empowered the national environmental enforcement community through enhanced interagency cooperation or even the setup of multiagency operational task forces, as well as through technical capacity development and a greater involvement in international cooperation.

At the international level, INTERPOL facilitated cooperative relations among NOCs through online exchanges, teleconferences and regional meetings. In several instances, NOCs entertained very active relations at the bilateral level, exchanging intelligence and expertise prior and during the Operation, and cooperating to jointly investigate some transnational cases.

A further step to enhance this global operational network was the **development of some strategic partnerships with regional and international organizations**, to ensure upstream coordination and better support member countries in this Operation. Different partnerships were articulated to achieve two strategic objectives: enhancing intelligence and deployment capabilities on the one hand, and developing a public communication strategy on the other hand. Europol was the key operational partner in the Euro-Mediterranean region. Other EU agencies, namely EFCA, EMSA and FRONTEX, were also involved in the operational network in this region. A partnership with UN Environment was also established to conduct a joint awareness raising campaign on marine pollution following the Operation.

3.2. Enhancing countries operational capacities

Capacity building focused on enhancing intelligence gathering, detection and investigative capacities in preparation for tactical deployment. It was organised around the **country-to-country expertise sharing principle, complemented by INTERPOL technical support.**

INTERPOL developed an **Operational Support Package** accessible by all NOCs through a secured sharing platform. The package included operational planning and reporting templates; the INTERPOL Investigative Manuals on *Illegal Oil Discharges from Vessels* and *Illegal Garbage Discharges from Vessels* elaborated by PCWG experts from different countries; a set of risk indicators of illegal vessel activity; and an on-board investigation checklist. In addition, INTERPOL distributed to all participating countries a Global Operational Plan identifying common operational targets and techniques across countries, based on the cross-checking of all countries' National Operational Plans.

INTERPOL and the PCWG organised also two **Regional Training Courses** on Investigating Shipping Pollution Violations, involving 23 African and Asia-Pacific countries. Training was delivered by national experts from the United States, specifically from the US Coast Guard, the US Coast Guard Investigative Service, and the US Department of Justice.

3.3. Operational Planning Meetings

In order to advance operational planning and identify areas and channels for international cooperation during the Operation, **twelve pre-operational planning meetings were organized at the regional level** (Asia-Pacific, Africa, Euro-Mediterranean region and North America) **and at the national level** (Indonesia-Timor Leste, Singapore, Pakistan, Philippines, Qatar and Republic of South Africa), as well as a regional teleconference (for Latin American participating countries) – see *Table 1*.

Key matters discussed during the meetings included the review of relevant international instruments and strategic priorities in addressing marine pollution crime; technical expertise sharing on profiling, detecting and investigating ship pollution violations; identification of specific crime types and targets to be addressed in the operation and related intelligence gathering; risk profiling; tactical planning and presentation of National Operational Plans; channels of information exchange and reporting; and post-operational analytical and investigative follow up.

Table 1. Operational Planning Meetings [1/2]

Asia-Pacific Operational Planning Meeting INTERPOL Global Complex for Innovation, Singapore, 17-19 April 2018

It involved 47 participants including representatives of 24 national law enforcement and environmental protection agencies from 13 Asia-Pacific countries - Bangladesh, Cambodia, Fiji, Indonesia, Myanmar, Pakistan, Papua New Guinea, Philippines, Republic of Korea, Singapore, Thailand, Timor Leste and Vietnam - and from South Africa⁽⁴⁾; as well as experts from the US Department of Justice, US Coast Guard and the US Coast Guard Investigative Service; delegates of international organizations (EUROPOL, UN Environment, Indian Ocean MoU on Port State Control), and academia (National University Singapore).

Euro-Mediterranean Operational Planning Meetings EUROPOL Headquarters, The Hague, Netherlands, 12-13 June and 19-20 September 2018

The two meetings, jointly organized by INTERPOL and Europol, brought together over 50 representatives from over 30 national agencies and 6 intergovernmental organizations, including 21 European and Middle Eastern countries: Albania, Belgium, Bosnia and Herzegovina, Bulgaria, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Jordan, Latvia, Lebanon, Netherlands, Norway, Poland, Portugal, Spain, Ukraine, and United Kingdom, along with relevant European Union agencies, namely FRONTEX, EMSA, EFCA and EUROJUST.

African Operational Planning Meeting INTERPOL Regional Bureau for East Africa, Nairobi, Kenya, 16-18 July 2018

With 29 law enforcers and environmental experts in attendance, the meeting allowed for consultations among 9 African and Middle Eastern countries, namely Cameroon, Ghana, South Africa, Kenya, Nigeria, Democratic Republic of Congo, Qatar, Senegal and Sudan. 16 national agencies were represented along with UN Environment and experts from the United States Coast Guard and the United States Coast Guard Investigative Service.

North American Operational Planning Meeting Environment and Climate Change Canada Headquarters, Ottawa, Canada, 31 July – 2 August 2018

Initiated and organized by PCWG Board Members, the meeting involved 21 participants representing three Canadian agencies (Environment and Climate Change, Transport Canada, Department of Justice), three United States agencies (US Coast Guard, Coast Guard Investigative Service, Department of Justice) and INTERPOL.

Latin American Operational Planning Teleconference 26 September 2018

It gathered the National Operational Coordinators from the 5 Latin American participating countries: Argentina, Chile, Colombia, Peru and Uruguay for discussion on National Operational Plans and regional cooperation facilitated by INTERPOL. Countries agreed to have follow-up call during the operational phase, which INTERPOL held on 17 October, to ensure continuous communication

⁽⁴⁾ South African representatives participated in the Asia-Pacific planning meeting (April 2018), upstream the African meeting (July 2018), in order to ensure inter-regional understanding and cooperation, and to bring lessons learned from the Asia-Pacific region to the African Planning Meeting.

Table 1. Operational Planning Meetings [2/2]

Qatar National Operational Planning Meeting
Qatari Naval Base, Doha, Qatar, 15 August 2018

Operational discussion took place with the Qatari Coast Guard, Airforce, Navy, Qatari Ports, Hamad Ports, Ras Laffan Ports, Ministry of Transportation, NCB Doha and INTERPOL.

Pakistan National Operational Planning Briefing
INTERPOL Global Complex for Innovation, Singapore, 31 August 2018

The meeting involved a Pakistani NOC representing the Pakistani Port Control Authority. It reviewed intelligence gathered in Pakistan such as specific modus operandi involving small ships, as well as operational reporting, INTERPOL support to international cooperation with Pakistan, and media involvement.

Indonesia-Timor Leste Bi-National Operational Planning Meeting
Jakarta, Indonesia, 7 September 2018

The meeting allowed for bilateral consultations between the Indonesian Coast Guard and the Timor Leste Customs, facilitated by INTERPOL and informed by representatives of Rutter - Radar Oil Spill Detection and Monitoring. It was the opportunity for the countries to discuss common targets in neighbouring waters profiled as high risk area for of maritime crime, and to foster bilateral cooperation and operational communication processes.

Singapore National Operational Planning Meeting
Maritime and Port Authority of Singapore Offices, Singapore, 10 September 2018

The meeting involved representatives from the Maritime and Port Authority of Singapore and from Singapore Police Force, which were the lead agencies of Singapore national operational plan. INTERPOL was in a position to clarify the planning phase of the operation and the reporting procedures.

South Africa National Expertise Sharing Workshop and Operational Simulation
Cape Town, 17-21 September 2018

The meeting involved more than 60 officers from all national agencies engaged in the Operation, namely: South Africa Police Services, Department of Environmental Affairs, South Africa Maritime Safety Authority, Transnet National Port Authority (TNPA), Customs Department and State Security, along with INTERPOL, international representatives of the PCWG and experts from the United States Coast Guard.

Philippines National Operational Planning Meeting
National Coast Watch Centre, Manila, Philippines 28-29 September 2018

This high-level operational briefing concluded a series of national trainings and multi-agency planning meetings in the Philippines. It was hosted by the Philippines Coast Guards and involved heads of departments from the National Police (Philippines Centre on Transnational Crime), Customs, and a legal officer from the Philippines Government. INTERPOL was invited as a guest of honour and provided guidance on tactical planning in this multi-agency cooperation setting, unprecedented to tackle this crime area in the Philippines.

IV. OPERATIONAL ACTIVITIES, STRENGTHENED THROUGH INNOVATION AND COOPERATION

Each participating country defined its own targets and operational activities based on its national priorities and capacities. Prior to the Operation, the **National Operational Plans** were submitted to INTERPOL, who compiled the Global Operational Plan.

Three key common themes emerged from this overview of national operational activities:

- Intelligence as a key tool to identify operational targets (4.1);
- The use of technologies in the tactical phase (4.2); and
- The law enforcement cooperation approach in undertaking operational activities, from operational planning to case investigation (4.3).

INTERPOL also deployed an officer in the field for investigative support upon countries' request (4.4).

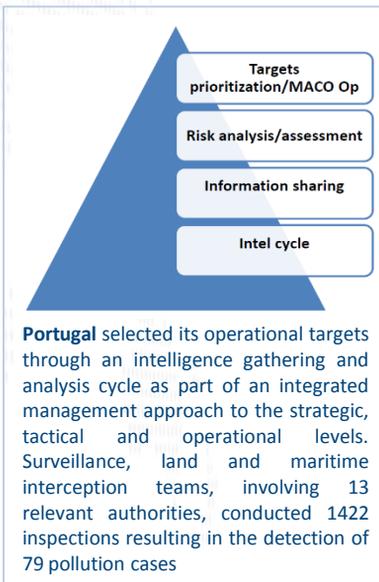
4.1. Intelligence-led operational targets

In the majority of participating countries, target identification resulted from intelligence gathering, which consisted mainly in screening vessels and companies of interest based on records of non-compliance. Variety of sources were used to this end, including national compliance targeting matrix for marine traffic and related lists of interesting ships; databases of the regional MoUs on Port State Control; and informants including former employees and rival shipping companies, to name a few. Some countries coupled historical data with intelligence collected during the Operation through Vessel Traffic Management Information Systems, National Aerial Surveillance Program overflights, and Satellite Monitoring.

Thailand conducted a multi-target operation deploying onshore and offshore assets to inspect ports, coastal areas in 23 provinces and territorial waters. Four intelligence principles guided target selection: probability, information sharing, intelligence gathering and statistical leads.



Argentina conducted 19,382 operational actions throughout its coasts and territorial waters, including intelligence gathering, satellite monitoring, aerial surveillance, onboard inspections, vessel tracking and sea patrolling coordinated by a Maritime Traffic System operational 24hrs.

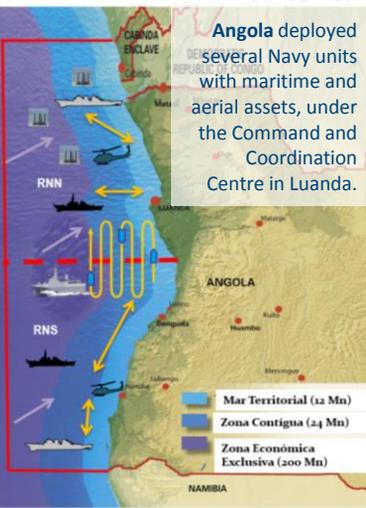


As a result, countries compiled a list of hotspots, targets and suspected vessels and companies that they aimed to pursue.

The principal intelligence-based targets - identified by at least 20 countries, from every region - concerned:

VESSELS PROFILED AS PRESENTING RISK INDICATORS & NATIONAL SEAPORTS

- Vessels and Flag States of interest, based on records of non-compliance,
- Merchant ships and bulk carriers,
- Cruise ships with records of non-compliance,
- Vessels with profiled Routes, and
- End of life ships



In Germany, authorities performed 313 inspections, 28 air surveillance flights, 27 AIS investigations and analyzed over 40 satellite pictures. As a result, they detected 165 marine pollution offenses and initiated 37 investigations on water pollution crime and illegal shipments from Europe for scrapping on Asian beaches. The total security deposits exceeded EUR 63,000 (USD 71,000).



Some hotspots on land and rivers were also identified by several countries from every region, in particular:

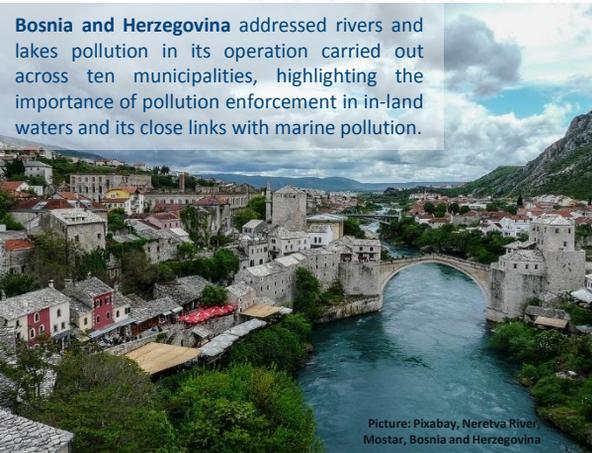
COASTAL SPACES
AND BAYS

SPECIFIC BAYS,
MARITIME AND
COASTAL AREAS
WITH HIGH
VIOLATIONS RATE

RIVERS AND
LAKES

LAND-BASED SOURCES OF
MARINE POLLUTION
(e.g. oil refineries and wage
plants, plastic bags)

Bosnia and Herzegovina addressed rivers and lakes pollution in its operation carried out across ten municipalities, highlighting the importance of pollution enforcement in in-land waters and its close links with marine pollution.



Picture: Pixabay, Neretva River, Mostar, Bosnia and Herzegovina



Italy carried out 1,147 inspections targeting non-biodegradable plastic shoppers and sewage plants. Authorities found 161 violations and issued almost EUR 750,000 (USD 850,000) in fines, with seizures amounting to over 3,000 tonnes.

The picturesque Ha Long Bay in **Vietnam** is a popular tourist destination, but unfortunately it is also a battleground in the fight against marine pollution crime. Vietnamese authorities patrolled the bay during Operation 30 Days at Sea to prevent illegal dumping and discharges.



A few targets were also identified by a single country, such as:

FISHING
TERMINALS

ILLICIT EXPLOITATION,
EXTRACTION, TRANSPORT
AND TRADE OF HYDRO-
BIOLOGICAL RESOURCES

OFFSHORE
EXPLORATIONS and
OPERATING PLATFORMS

OIL BLENDING



The Netherlands articulated tactical deployment in three target areas, one of which was the detection of illicit oil blending. The use of dirty fuels is an emerging pollution crime with significant impacts on water and air quality.

A team that focuses on black oil streams.

Half of the participating countries conducted the Operation nationwide, while the other half engaged in specific regions. Most countries operated for the whole month of October (70%) and the remaining countries during selected days, due to port traffic conditions and availability of capacity and resources. In most countries, operational activities consisted of regular surveillance and deployment, with some of them reinforcing their routine activities during the Operation or planning specific unprecedented action plans. Some countries articulated their operational plans in phases, allocating a different target area or a different task to each phase.

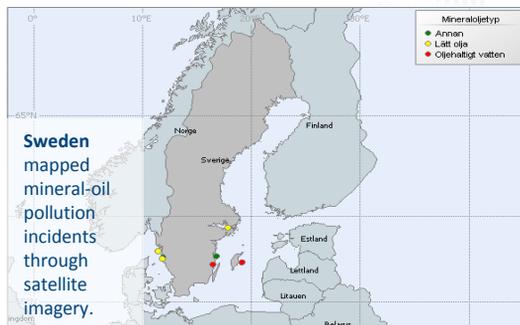
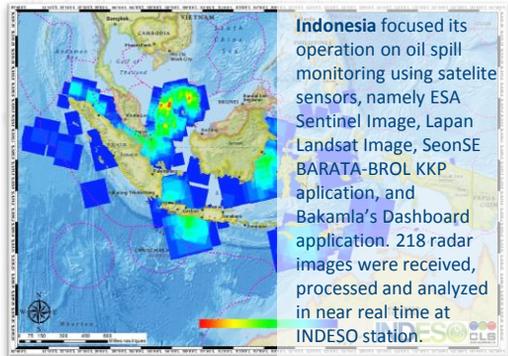
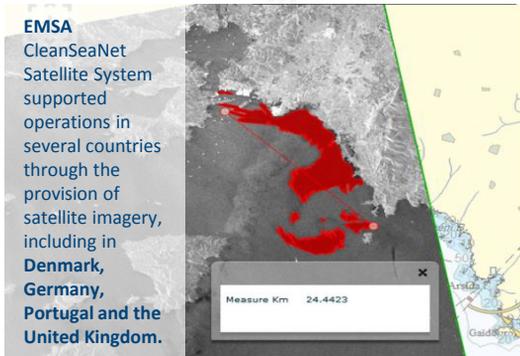
4.2. Enforcement innovations: Equipment and technologies deployed

This Operation saw an **extensive use of both traditional surveillance vehicles and equipment**, such as aerial surveillance and sea patrols, **and innovative technologies and techniques** applied to marine pollution detection.

Innovative techniques and technologies deployed by countries during the Operation included:

- **Satellite imagery;**
- **Advanced aerial surveillance technologies:** drones, including technologies such as sulphur sensors and mapping software; aircrafts equipped with side looking airborne radar (SLAR), electro-optical infrared camera system (EO/IR) and infrared and ultraviolet line scanner (IR/UV);
- **Vessel tracking** systems, including Automatic Identification Systems (AIS) and various software and mobile applications;
- Various **IT equipment** such as facial capturing systems, fingerprints scanning systems, night vision cameras, XRF scanners, X-ray scanners and special equipment for oil spills;
- **Forensic** equipment and laboratories.

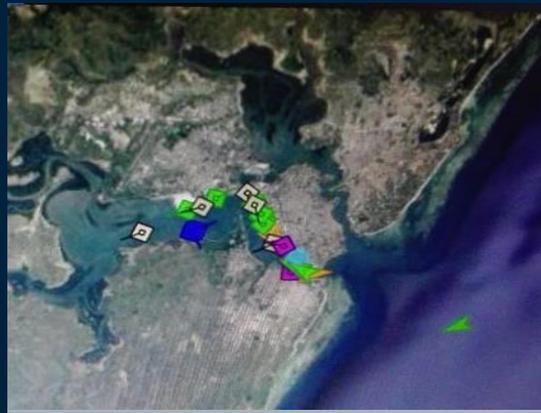
While in some countries these technologies and equipment are incorporated routinely in marine pollution enforcement, in other instances this Operation triggered their use. For example, Nigeria experienced the unprecedented use of drones for port inspections with INTERPOL assistance, which marked an important step forward in the country's capacity to detect marine pollution crime. 30 Days at Sea marked also the first integration of EMSA's CleanSeaNet and SafeSeaNet satellite systems into an INTERPOL operation, benefiting a large number of European countries and partner countries.



Karachi Oil Spill 23 October 2018



In **Pakistan**, satellite imagery was instrumental to identifying the vessel responsible for a large oil spillage detected during the Operation, with over 40 metric tons of bunker oil dumped in the sea. Investigations carried out by the Maritime Security Agency found the vessel guilty of violating several laws, including documents forgery, non-reporting of oil spill, hiding facts and misleading officials.



In **Kenya**, the use of Sea Vision technology and TV32 was instrumental to identifying vessels of interest by providing real time traffic information in areas around suspicious maritime events. The technology also assisted the operation team to prioritize vessels for inspections.



Transport **Canada** deployed its National Aerial Surveillance Program conducting 20 night flights to detect pollution incidents. Aircrafts are equipped with night vision cameras, Side Looking Airborne Radar (SLAR), Electro-optical Infrared Cameras (EO/IR) and Infrared/Ultraviolet Line Scanners (IR/UV).



In several countries, including **Finland, Greece, Ireland, Norway, Spain** and the **United Kingdom**, operational tactics encompassed aerial surveillance. For example, **France** POLMAR helicopters and aircrafts conducted 187.6 hours of surveillance flights.



In **Norway** the use of drones with Sulphur detectors deterred the non-compliance of vessels with regulations against air pollution from ships.



Vessels Tracking Systems, including automatic identification system (AIS), software and applications were used in **Angola** to monitor vessels positions and itineraries, and detect risk indicators.



Inspection techniques used in **Spain** during Operation 30 Days at Sea included submarine sampling to investigate marine pollution crime through forensic analysis.



In an area contaminated by discharges of animal waste detected in the **Philippines**, samples of shellfish were collected for forensic analysis. Determining the contamination level to which local communities were exposed allowed Filipino authorities to plan appropriate clean up and sanitation measures.

4.3. Law enforcement cooperation: from planning to investigating

National multi-agency task forces

At the domestic level, most participating countries engaged several relevant agencies ranging from criminal, maritime and environmental inspectorates to prosecution authorities, sometimes setting up multi-agency task forces for the first time in the pollution control domain. According to several countries, this holistic approach, applied throughout operational planning and execution, greatly improved the efficiency of operations: it empowered the team as a whole by integrating different types of expertise and mandates; it generated better results due to integration of efforts and resources; it created momentum and fostered motivation through a sense of team work; it generated mutual knowledge development and awareness raising.



South Africa set up a large multiagency task force comprising seven relevant authorities, who jointly planned the operation over several months and deployed multidisciplinary teams during the tactical phase.



A distinctive feature of the multiagency operation conducted in **Bulgaria** by the National Police, the Maritime Administration and the Environmental Authority was the involvement of the Prosecutor's office from the early stages of operational planning in order to promote an effective law enforcement process from field inspections to the criminal justice system. Prosecutors joined the on-board investigation teams, analyzed historical and operational data, and stand by throughout the tactical phase to initiate criminal proceedings if needed

Participating countries in the **Gulf of Guinea** focused their operations on strengthening interagency coordination and law enforcement capacity to combat marine pollution, recognizing the need for collaboration to efficiently execute collective mandates to protect the environment and society.

In **Ghana**, NCB Accra was the focal point of a multiagency operation grouping 9 competent authorities.

In **Nigeria**, NCB Abuja coordinated a task force involving 15 relevant enforcement, maritime and environmental agencies.

Cameroon's key lesson learned from this operation in that interagency cooperation is a fundamental precondition in marine pollution enforcement



Bilateral cooperation

The Operation featured several successful examples of **country-to-country engagement**, both between neighbouring countries and at the interregional level.

Country to country cooperation involved:

- **Expertise sharing** during investigations or for capacity building purposes, including national experts visiting other countries to deliver training;
- **Intelligence exchange** prior to the operation; and
- **Investigative cooperation** on several cases detected during the tactical phases, notably when a suspect or offending vessel inspected in one country was flagged for further inspection at the next port of arrival.

On these latter instances, vessel tracking technologies and INTERPOL operational support were particularly important to determine the vessel route and estimated time of arrival at the next port, in order to alert the relevant authorities and brief them with intelligence through the NOCs and NCBs networks and to prepare inspections upon the vessel arrival in another country.

A comprehensive bilateral cooperation took place between Canada and the United States, who planned and conducted a joint intelligence-led operation in three neighbouring regions (Great Lakes, Atlantic and Pacific Coast), involving bi-national inspection teams and extensive expertise sharing.



Joint vessel inspection between **Canada** (Transport Canada and Environment and Climate Change Canada) and **the United States** (US Coast Guards) during the Operation.



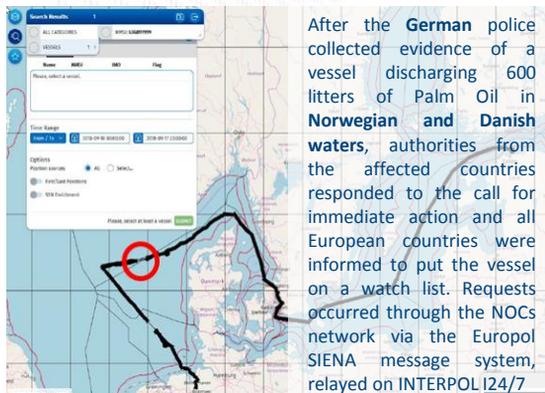
Investigative cooperation between **South Africa**, the **Netherlands** and **Belgium** started when South Africa requested the Netherlands to inspect a vessel loaded with residual ashes. During the voyage the vessel diverted to Belgium, and the Netherlands notified the Belgian authorities who followed up with the investigation. Cooperation between countries was real-time and effective, and immediate action was taken by all parties.



The country-to-country expertise sharing approach was instrumental to enhancing capacities in preparing for the Operation, such as in the cases of the **United States – Asia Pacific** and **United States-Africa** cooperation, facilitated by INTERPOL.



French authorities worked together with their **Italian** counterparts to mitigate the risk of major pollution from oil spill resulting from a ship collision in the Mediterranean.



After the **German** police collected evidence of a vessel discharging 600 liters of Palm Oil in **Norwegian** and **Danish** waters, authorities from the affected countries responded to the call for immediate action and all European countries were informed to put the vessel on a watch list. Requests occurred through the NOCs network via the Europol SIENA message system, relayed on INTERPOL I24/7



Latvia detected a case of pollution in the Paviļosta port waters with oil products leaking from a sunken ship and cooperated with the **Danish** authorities on this investigation.



INTERPOL facilitated a joint tactical planning meeting between **Indonesia** and **Timor Leste** to discuss common targets in neighboring waters profiled as high risk area for of maritime crime, and to foster bilateral cooperation and operational communication processes. Both countries exchanged information on a target vessel. (see Table 1)

Multilateral cooperation

Operational Planning Meetings (see Table 1) were an important occasion to foster multilateral cooperation, especially at the regional level, by building regional NOCs networks and shaping common views on regional priorities and strategies.



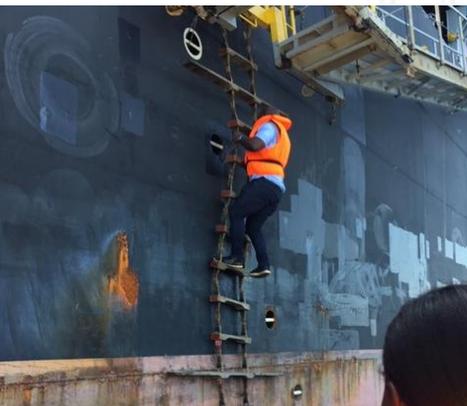
Europol, the E.U. agency facilitating cooperation among European police forces, played a key role in ensuring coordination among Euro-Mediterranean countries for this Operation and joined operational activities in the field.

Left: Europol operational support to the Netherlands Police during a patrol

Right: Euro-Mediterranean Operational Planning Meeting, jointly organized with INTERPOL and hosted at Europol's headquarter.

4.4. INTERPOL investigative support

During the Operation and its immediate investigative follow up, an INTERPOL Criminal Intelligence Officer was deployed in some countries with a view to supporting team building, inspections, investigations, and publication of Purple Notices.



At Tema Port, **Ghana**, the Officer was involved in offshore inspections onboard vessels, assisting the examination of waste equipment and the detection of gallons of waste oil improperly stored in water-cooler bottles in the engine room and upper deck. Authorities suspected the bottles were to be dumped at sea, posing a grave threat to the marine environment, and launched an investigation in this regard.



In Doha, **Qatar**, the Officer assisted the Qatari Coast Guard-led water patrol of moored cargo, oil and gas vessels in the Arabian Gulf, preceded by aerial surveillance carried out by Airforce Helicopter, and complemented by AIS and radar monitoring to identify vessels of interest, witnessing how such rigorous compliance activity resulted in effective deterrence of pollution events and strengthening INTERPOL operational relationships in the Middle East.



In **Nigeria**, INTERPOL worked closely with NCB Abuja to train their National Technical Officer to become a UAV expert, able to assist Nigeria operational activities of “30 Days at Sea”, with the unprecedented use of drones to reinforce the surveillance of the Tin Can and Apapa Port areas. Fly overs of the ports were conducted with orthomosaic photogrammetry for mapping purposes, as well as to observe shipping movements and identify potential pollution events. This initiative marked an important step forward in Nigeria’s capacity to detect marine pollution crime.





In the **Philippines**, a serious case of contamination was uncovered, stopped and prosecuted by local law enforcement with the support of INTERPOL a pig farm, housing some 13,000 animals, was found to be discharging the waste water into the ocean. The effluent flew openly alongside a small residential community where children played, directly endangering their health. The waste from the piggery flew also to the coast, polluting the coastal waters where locals collected shellfish as a food source. Their livelihoods depend on marine products, so this pollution crime posed a great risk to their health, food security and economic development. A multi-agency investigation was launched including laboratory sampling, surveillance activities, engagement of prosecutors, and execution of search warrants. The investigation resulted in the arrests of four persons and the dismantling of the pipe system which discharged the effluent. The matter is now before the court.



V. OPERATIONAL RESULTS: TRENDS OVER 1500 DETECTED OFFENCES

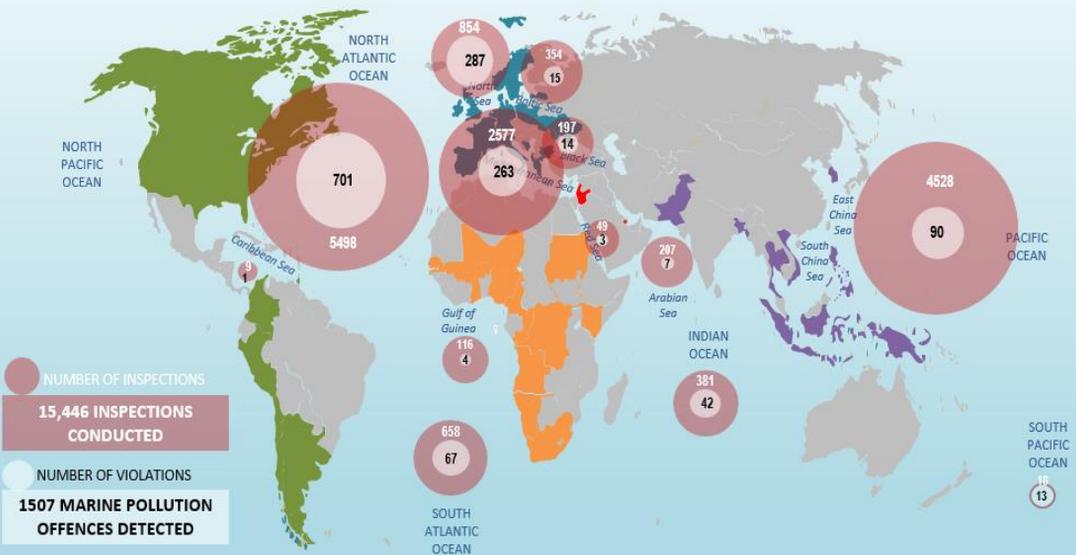
5.1. Key achievements: one out of ten inspections exposed a marine pollution offence

Operation 30 Days at Sea was the first global operation ever led to focus a law enforcement response to marine pollution. The **15,446 inspections conducted worldwide** resulted in the **detection of 1507 marine pollution-related offences** (see Figure 3) and **701 investigations** initiated with subsequent fines and prosecutions in numerous cases. Cases reported by national authorities to INTERPOL allowed to **identify 202 vessels and 76 companies** involved in marine-pollution offences.

Figure 3. Map of the key results of the Operation



INSPECTIONS AND MARINE POLLUTION OFFENCES DETECTED DURING OPERATION 30 DAYS AT SEA



Larger version of the map in Annex 2

5) 633 cases of minor violations and deficiencies were reported to INTERPOL.
85 cases of other types of offences were reported to INTERPOL.

The rate of non-compliance (ratio between the number of inspections and number of violations detected) indicates that 9.8% of targets were non-compliant with marine-pollution regulations.

The 1,507 marine pollution-related offences detected on land, in internal waters or at sea are a portion of the over two thousands violations uncovered during the operation, including also hundreds of minor violations and deficiencies and cases related to other types of offences, such as fishery crime, drug trafficking and violations of safety regulations, which were detected during multipurpose inspections. The following analysis of the criminal patterns of marine pollution-related crime unrevealed during the operation is based on 831 cases that were reported in details to INTERPOL, with criminal and qualitative information.

Operational findings indicate that every one out of ten inspections exposed a marine pollution offence. Such offenses affect all regions of the world, usually presenting transnational profiles. Although marine pollution appears mainly as a corporate crime or as the consequence of negligence, indicators of transnational organized crime were found in at least one case.

The immediate impact of this Operation was the effective containment of sea contamination following a large number of incidents and violations in every regions of the world, along with the disruption of some illicit businesses with subsequent arrests and prosecutions.

In **Albania**, a sunken fishing vessel was threatening to spill hundreds of liters of oil into the sea. Law enforcement officers isolated the spill, mitigating the contamination and preventing an ecological catastrophe.



An accidental collision between two vessels in the Mediterranean Sea, off Cap Corse, **France**, caused a major oil spill in October. Dozens of liters of oil spilt into the sea, threatening marine life and affecting at least 30 beaches, with authorities forced to close them to the public as a precaution. Contamination was effectively contained and the clean-up began thanks to the swift response from the French authorities during Operation 30 Days at Sea.



Italy detected the undifferentiated disposal of contaminated products with high infectious risk from vessels. Investigations carried out by the Anti-Mafia and Anti-Terrorism Prosecution in Sicily prevented the spreading of viruses such as scabies, HIV, tuberculosis and meningitis.



Fiji authorities detected 12 vessels and seized the untreated waste, which was then correctly destroyed by bio security at the port



In **Moldova**, vessels in the Danube River with oil products for loading and unloading were installed with a catchment barrel whose loading quay was inclined to accumulator to capture oil discharges in case of illegal leakage of oil products. A drainage system was used to evacuate potential leaked products. This strong compliance system resulted in zero oil-related marine pollution events.



In its national operation, **Peru** addressed the contamination of the Peruvian sea originating from illegal mining activities, which pour its effluents, especially mercury and other chemical substances, into nearby rivers flowing into the sea.



When negligence led to a vessel colliding with the dock in **Senegal**, authorities acted quickly to contain the resulting oil spill.



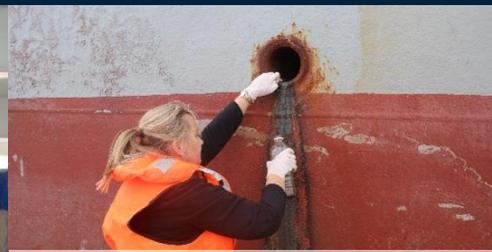
Spain undertook a criminal investigation on a large marine contamination event deploying aerial assets, forensic laboratories and environmental investigation experts. It resulted in the arrest of 11 individuals charged with environmental crimes, prevarication and document fraud.



In **Pakistan**, authorities undertook the cleanup of a large oil spillage detected in the outskirts of Karachi, safeguarding a local fishing village. The cleanup took one week of hectic efforts, involving more than 1000 personnel from 10 organizations. Investigations found that a nearby underwater oil pipeline had leaked, which prompted the Pakistani environmental agency to stop operations of that oil company.



In **South Africa**, more than 5,000 tonnes of waste was removed from the marine environment in connection with almost 60 violations detected during Operation 30 Days at Sea.



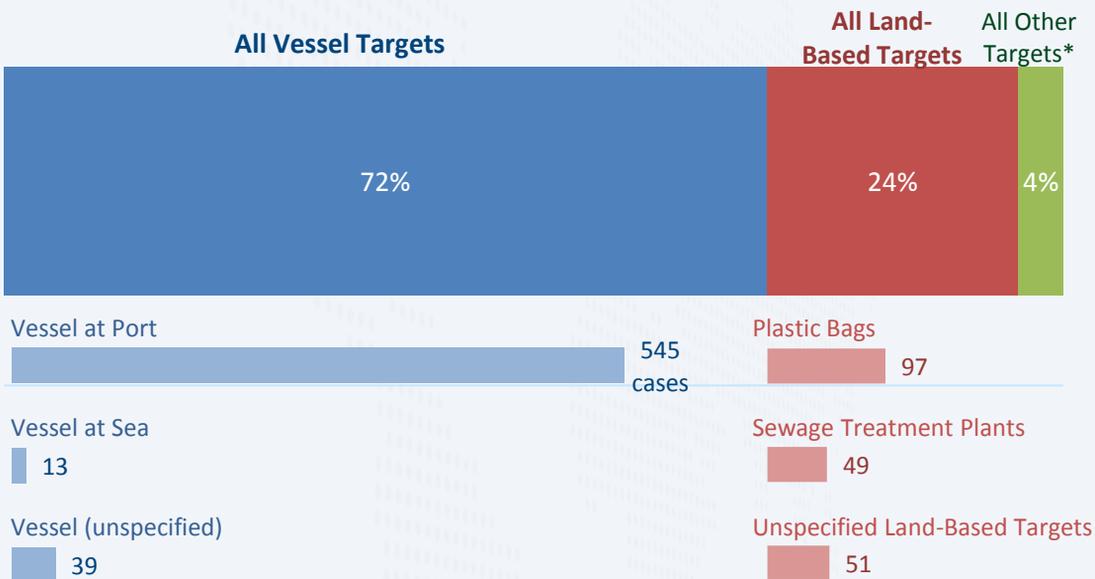
South Africa convicted a fishing boat captain of dumping sewage into the country's waters. The investigation that led to the conviction was opened during Operation 30 Days at Sea. This case was the country's first marine pollution crime conviction. The accused was sentenced to pay a R300,000 (USD 20,000) fine or 24 months imprisonment.



5.2. Targets of inspection leading to offence detection

Inspections leading to reported cases during this Operation can be broadly classified in three groups according to their target: vessels, land-based targets, and other targets. As illustrated in the graphic below (Figure 4), over 70% of the reported marine pollution offences were detected through vessel inspections, particularly when inspecting vessels at port. The proportion of offences detected at sea was considerably lower, accounting for only 2% of vessel cases. The second largest number of offences were detected through land-based targets, especially businesses involving illegal plastic bags and sewage treatment plants.

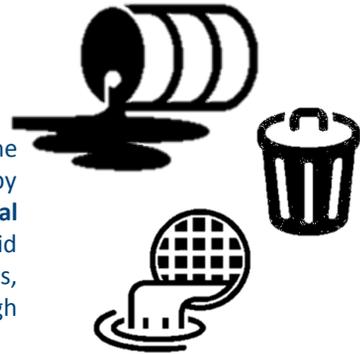
Figure 4. Reported cases, according to the target of inspection



**Other targets include: Coastal Space or Bay (17 cases), River or Lake (12), Port Facility (4), Fishing Terminal (1), and Harbour Basin (1)*

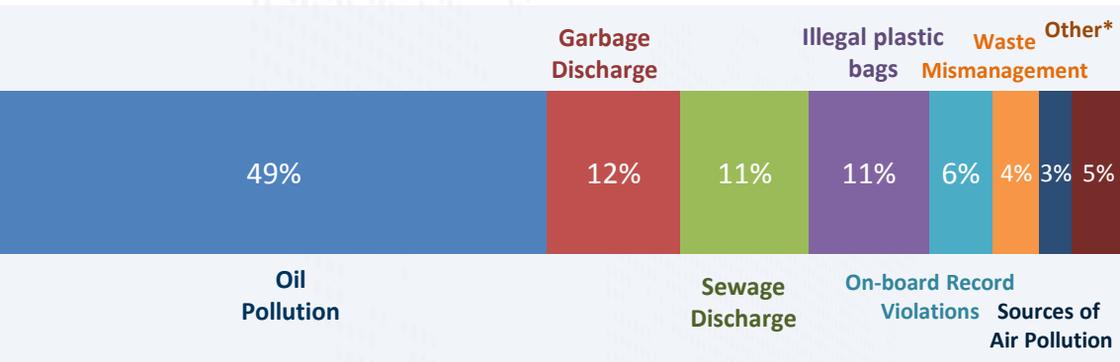
This result seems to suggest that land and port inspections may be more effective to detect marine pollution offences than sea and coastal patrolling and monitoring. However, it is difficult to validate this tactical implication based on the data available, which may simply reflect a greater law enforcement mobilization on land and in ports rather than at sea for reasons ranging from intelligence to expertise and availability of resources.

5.3. Marine pollution events detected



As indicated in Figure 4, **oil pollution** accounted for half of the marine pollution offences detected in this Operation, followed by **garbage and sewage discharges**, and activities related to **illegal plastic bags**. Other offences including discharges of noxious liquid substances and ballast water, air pollution from vessels, shipbreaking and waste management were also found, although accounting for a much lower proportion of the reported cases.

Figure 5. Reported cases, according to the type of pollution event detected or prevented



Results revealed some **regional patterns** specific to some types of pollution event (strong correlation^[6]). Table 2 shows that while oil pollution events were an important share of the pollution events across all regions^[7], other types of pollution events were more specific to some regions: Garbage discharges were prevalent in all developing regions and regions with economies in transition (all but Europe and North America). Sewage discharges were important in Africa and Europe. Illegal plastic bags were targeted and detected in Europe only. In Latin America, record violations were relatively more frequent than in any other region.

While these regional differences may reflect the different focus of inspections in specific countries, they may also be interpreted as region-specific risk indicators to guide future enforcement action. It should also be noted that the correlation between the type of pollution event and regions refers to the region where the event was detected, and it does not necessarily reflect the nationality of offenders (flag state of offending vessels and nationality of the offending companies and crews), regarding which some analytical observations are proposed in Annex 3.

⁶⁾ The levels of correlation indicated in this report (no significant correlation, weak, moderate, or strong correlation) derive from a statistical test called "Cramer's V".
⁷⁾ Oil pollution incidence varied across regions, from 82% of North American cases to only 16% of cases from Africa and Europe, however, for every region, oil pollution was among the three most encountered types of pollution event.

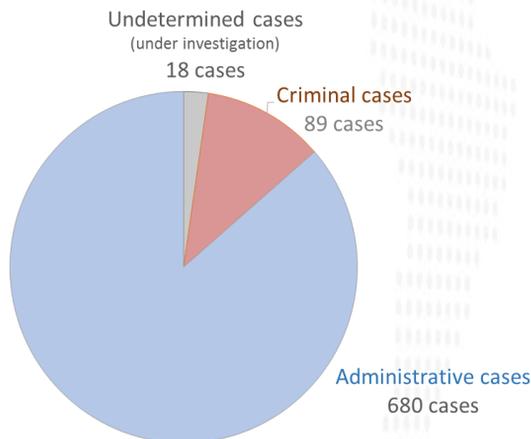
Table 2. Types of pollution events found in the different regions

Types of pollution → Regions ↓	Oil Pollution	Garbage Discharge	Sewage Discharge	Illegal plastic bags	On-board Record Violation	Waste Mismanagement	Sources of Air Pollution	Other pollution types*	Multiple pollution types involved
ALL REGIONS (815 cases)	403 49.4%	98 12.0%	85 10.4%	96 11.8%	46 5.6%	29 3.6%	21 2.6%	37 4.5%	12 1.5%
AFRICA (49)	8 16%	13 27%	10 20%	0 0%	7 14%	5 10%	1 2%	5 10%	4 8%
ASIA-PACIFIC (41)	13 32%	15 37%	2 5%	0 0%	3 7%	3 7%	1 2%	4 10%	2 5%
EUROPE (298)	47 16%	15 5%	55 18%	96 32%	28 9%	21 7%	11 4%	25 8%	6 2%
LATIN AMERICA (23)	8 35%	7 30%	0 0%	0 0%	7 30%	0 0%	0 0%	1 4%	0 0%
MIDDLE-EAST (9)	4 44%	1 11%	3 33%	0 0%	1 11%	0 0%	0 0%	0 0%	0 0%
NORTH AMERICA (395)	323 82%	47 12%	15 4%	0 0%	0 0%	0 0%	8 2%	2 1%	0 0%

Note: Numbers and percentages above are based on the 815 cases reported to INTERPOL that gave indication on the pollution event involved in the offence. Boxes highlighted in dark red indicate for each region the pollution events involved in at least 25% (1/4) of cases; boxes highlighted in bright red indicate other important regional pollution events, involved in 15% to 25% of the reported offences in each region. Regional trends in Middle-East are marked in grey and are not analysed because of their low occurrence (statistical bias). Other pollution types include cases of discharges of Noxious Liquid substances (12), discharges of ballast water (10), and shipbreaking (3).

5.4. Criminalization of marine pollution offences

Figure 5. Administrative and criminal cases reported during the Operation



The overwhelming majority of reported offences were **administrative cases** (86%, Figure 5), with a clear correlation with some specific pollution events and targets (Table 3): The vast majority of reported **vessel violations** (93%) were considered administrative violations, especially offences related to discharge of ballast water, source of air pollution, and record violations which all fell under this category; most garbage discharges (92%) were also considered administrative offences. Regarding land-based cases, most offences involving **illegal plastic bags** (97%) were considered administrative.

Criminal cases accounted for 11% of the offences detected (Figure 5), with some specific patterns identified (Table 3): **Land-based offences** tended to be more “criminalized” (22% of land-based cases, instead of 11% of all cases), especially **illegal treatment plants** (46%); only 6% of vessel violations reported as criminal, however all **shipbreaking** cases were considered criminal, and offences related to **noxious liquid substances** and were relatively more criminalized.

Finally, at the time of reporting, 2% of the reported cases were still under investigation with undetermined criminal or administrative classification. Almost all of these cases were related to oil events, suggesting that a longer time may be required to conclude investigations on oil pollution.

Table 3. Part of criminal and administrative offences for different types of targets

Type of violation → Inspection targets ↓	Criminal Offences	Administrative Offences	Undetermined (under investigation)
All Targets	136 11%	818 86%	28 2%
All Vessel Targets	37 6%	529 93%	5 1%
Vessel at Port	28 5%	510 95%	1 0%
Vessel at Sea	6 46%	6 46%	1 8%
Vessel (undetermined)	3 16%	13 68%	3 16%
All Land-Based Targets	39 22%	140 77%	2 1%
Illegal plastic bags	3 3%	94 97%	0 0%
Sewage Treatment Plant	22 46%	26 54%	0 0%
Land-Based Targets (undetermined)	14 39%	20 56%	2 6%
All Other Targets	12 35%	11 32%	11 32%
<u>Harbour Basin</u>	1 100%	0 0%	0 0%
Port Facility	1 33%	1 33%	1 33%
Fishing Terminal	0 0%	0 0%	1 100%
River or Lake	2 17%	9 75%	1 8%
Coastal Space or Bay	8 47%	1 6%	8 47%

Note: Numbers and percentages above are based on the 982 cases reported to INTERPOL that gave indication on both the type of violation (criminal/administrative) and the inspection target. Highlighted boxes indicate strong correlations; Numbers in grey are values that are statistically insignificant because of their low occurrence.

While a significant correlation was observed between the level of criminalization of the offence and the type of pollution event, the criminalization of marine pollution offences rather revealed consistencies across regions [8].

8) Differences across regions mostly resulted from one single country unbalancing the overall regional results (U.S.A. in North America and the Republic of Korea in Asia-Pacific), apart from which regional trends were relatively consistent t

5.5. Key modus operandi in marine pollution offences

The analysis of reported cases highlighted four prevalent modi operandi in committing marine pollution offences:

1. **Deliberate offences;**
2. **Offences resulting from negligence;**
3. **Offences occurring as a result of accident or misadventure; and**
4. **Offences related to poor condition of vessel and/or on board equipment.**

The different modi operandi presented some strong correlations with specific inspection targets, types of pollution event (Table 4), and regions of the world (Table 5).

Table 4. Trends of the types of Modi Operandi, according to different targets

M.O. Categories → Inspection Targets ↓	Deliberate	Negligence	Accident or misadventure	Poor condition of vessel & onboard systems
All Targets	147 50%	72 25%	17 6%	57 19%
All Vessel Targets (123 cases)	13%	35%	12%	40%
Vessel at Port (95)	14%	35%	11%	41%
Vessel at Sea (12)	17%	25%	33%	25%
Vessel (undetermined) (16)	5%	45%	5%	45%
All Land-Based Target (151)	82%	16%	0%	2%
Illegal plastic bags (96)	100%	0%	0%	0%
Sewage Treatment Plant (37)	51%	43%	0%	5%
Land-Based Target (undetermined) (18)	47%	47%	0%	5%
All Other Targets (13)⁹	50%	14%	14%	21%

Note: Numbers and percentages above are based on the 293 cases reported to INTERPOL that gave indication on both M.O. and inspection target. Highlighted boxes indicate strong correlations.

Land-based offences were mostly **deliberate**, while **offences on vessels** were more likely to occur due to **negligence, accident or poor conditions** of on board systems, as illustrated in Table 4. This finding was reflected in the modus operandi characterizing specific pollution events: most discharges from vessels at sea (oil, garbage and sewage) were usually the result of negligence, accident or poor conditions on-board, rather than deliberate acts. They were also often coupled with a poor attention given to record keeping, whose related violations occurred by negligence in nearly 90% of cases.

This suggests that **illegal acts of pollution from ships rather result from a lack of attention to compliance**, for the sake of convenience and/or of cutting costs; this could also underline that pollution offenders on ships have a poor awareness of and consideration for the environmental impacts of their actions.

9) The sub-categories of "other targets" are not displayed in the table as number of incidences are too low (<5) to indicate significant trends

Reported offences committed on land seem to respond to a different logic. For example, violations linked to **sewage treatment plants were highly deliberate and criminal**. One participating country who focused its operational activities on tackling illegal plastics found that 100% of these offences were deliberate.

Table 5. Regional trends of the different types of Modi Operandi

M.O. Categories → Regions ↓	Deliberate	Negligence	Accident or misadventure	Poor condition of vessel & onboard systems
WORLD	50%	25%	6%	19%
AFRICA (28 cases)	15%	56%	4%	26%
ASIA-PACIFIC (35)	23%	14%	17%	46%
EUROPE (223)	59%	23%	4%	14%
LATIN AMERICA (3)	0%	100%	0%	0%
MIDDLE-EAST (2)	0%	0%	0%	100%
NORTH AMERICA (2)	0%	50%	50%	0%

Note: Percentages above are based on the 293 cases reported to INTERPOL that gave indication on M.O. The low level of information on M.O. for reported cases from Latin America, Middle-East and North America did not allow for further analysis on regional patters regarding M.O. Highlighted boxes indicate strong correlations.

The prevalence of each modus operandi differed across regions, as highlighted in Table 5. Most deliberate offences were found in Europe. Offences due to negligence were relatively important in Africa. In Asia-Pacific, offences resulting from accidents or poor vessel conditions were relatively frequent.

5.6. Widespread incidence of marine pollution among ship types

Twelve different types of vessels^[10] were reported in connection with detected marine pollution offences, showing the widespread incidence of marine pollution crime across the shipping industry.

Cargo or container ships seemed particularly prone to commit such violations, accounting for one third of all cases reported and presenting a very strong correlation with records violations (75% of all records violations found concerned this vessel type) and therefore with negligence as the prevalent modus operandi.

A significant non-compliance rate was also found among **bulk carriers** (20% of all cases reported), who were responsible for all violations related to ballast water. **Oil and chemical tankers** and **fishing vessels** were also characterised by a moderate offending rate (12%), with fishing vessels being particularly involved in oil pollution violations.

There was no significant correspondence between vessel types and specific modus operandi.

10) Barges, bulk carriers, cargo ships, dredgers, fishing vessels, gas tankers, offshore supply ships, oil and chemical tankers, passenger ships, ro-ro ships, rubber boats, and tugs.

5.8. Strategic and long terms impacts

Besides some immediate results in terms of environmental protection, the Operation generated also some strategic and long term impacts, on which further law enforcement responses should build.

First, the Operation fostered a **significant and synchronized law enforcement mobilization globally, sending a strong political message** that marine pollution is an emerging priority in the agenda of the global law enforcement community.

This impact was particularly important in a number of African, Asian and Pacific countries where marine pollution is still a very new or neglected area of law enforcement. In those countries, the involvement in a global INTERPOL operation encouraged an **unprecedented engagement by law enforcers** in this crime area, the **development of technical capacities** to address these challenges, and advocacy at the policy level to increase prioritization of marine pollution enforcement.

Second, in a large number of instances, the Operation **brought stakeholders together to fight pollution crime in concert** for the first time, at every level. At the national level, it fostered the setup of **new multiagency teams** in numerous countries, who reported some very positive outcomes in terms of how their operational model has been changing towards a more effective and holistic approach to marine pollution enforcement. **New frameworks for cooperation emerged at the country-to-country level**, for example between Canada and the United States where “30 Days at Sea” was the first joint environmental enforcement operation. New regional dynamics were particularly pronounced in Europe, where following “30 Days at Sea”, marine pollution became a new priority within the EU policy cycle on serious and organised crime. Finally, **at the international level**, the Operation articulated a new cooperation between INTERPOL, Europol, UN Environment, EFCA, EMSA and FRONTEX, in consultation with the Secretariats of several regional Memorandum of Understanding on Port State Control.

Third, this Operation **generated actionable intelligence** from the analysis of the operational results, to drive future targeted intelligence-led marine pollution operations.

VI. AFTER THE OPERATION:

RAISING AWARENESS AND PLANNING FURTHER ACTIONS

6.1. “30 Days of Awareness” on Marine Pollution Crime

INTERPOL launched a 30-day communication campaign following the Operation, in close cooperation with participating countries, the Executive Board of the PCWG, Europol, and UN Environment.

Its main objectives were to **raise awareness on Marine Pollution Crime**, notably to **push marine pollution enforcement in the agenda** of the global law enforcement community, and to **incentivize compliance among the shipping industry**. It was also the occasion to put a spotlight on countries’ actions and overall operational results.

The three key messages of the Campaign were:



The communication campaign started on 13 November 2018^[11] with the simultaneous publication of press releases from INTERPOL, Europol, UN Environment and participating national agencies, based on a common template.

Most of the campaign was held on INTERPOL Environmental Security’s Twitter account (@INTEPOL_EC), which alone generated about 500,000 impressions (number of views). The news was relayed by hundreds of news articles, published in news from at least 16 different countries.

This campaign was made possible by the engagement of partners and participating countries during the planning phase. The role of participating agencies was essential in collecting and sending out communication material (photos and videos) to INTERPOL, and engaging with their media department and/or national media when relevant.

¹¹⁾ The 13th of November was an embargo deadline, as no public announcement was made regarding the Operation before its end, in order to protect the integrity of operational activities.

6.2. Global Post-Operational Meeting

In March 2019, INTERPOL organized a global post-operational meeting at its headquarters in Lyon, gathering **65 participants representing 33 of the participating countries from every region, the Pollution Crime Working Group Executive Board, EUROPOL, UNODC, FRONTEX, EMSA and EFCA**. Countries shared their operational actions and results, through presentations articulated in key thematic discussions related to marine pollution enforcement: innovations (technologies and investigative techniques); intelligence-led operations; inter-agency and international cooperation.



Criminal trends and related risk indicators of marine pollution crime emerged from the analysis of the operational results were discussed along with the publication of Purple Notices. The meeting featured also a series of small group discussions to collectively identify priority targets and operational strategies to further marine pollution enforcement globally, the implementation of EMPACT action plan on marine pollution crime, as well as cooperation to tackle illicit shipbreaking and to advance investigations on some transnational cases detected during the Operation.

As a result, the conference achieved three concrete objectives:

- **Reviewing the results and impacts** of Operation 30 days at sea;
- **Strengthening the global marine pollution enforcement network** built through this operation, particularly inter-regional relations; and
- **Outlining countries' needs and priorities**, to determine the next operational, investigative and capacity building activities.

However, the most significant achievement of this meeting was probably making participants feel part of an international momentum with a common goal to enforce marine pollution crime. Commitment and enthusiasm were evident, with countries buoyed by excellent operational results and positive environmental outcomes. Participants could witness the great level of engagement by their counterparts, laying solid foundations for trust relations and international cooperation.

VII. WAYS FORWARD

7.1. Reviewing lessons learned

A globally coordinated Operation was instrumental to creating momentum and pushing the marine pollution enforcement agenda in several countries where law enforcement mobilization in this domain was previously limited. This resulted into increased engagement by law enforcers and greater positive impacts on environmental protection.

An extended pre-operational phase comprising of several multinational planning meetings, conference calls and investigative support tools greatly helped to engage numerous countries, build a cooperative network of relevant stakeholders, enhance national capacities, and plan for a successful Operation. Those countries who actively participated in pre-operational activities achieved particularly successful results in their national operations and were more prone to draw on international cooperation for expertise sharing and investigative purposes.

The identification of National Operational Coordinators in each participating country greatly benefited the whole operational cycle, by streamlining communications, making coordination more effective and ensuring a more coherent follow up. It also allowed for better management of operations domestically and facilitated international cooperation where countries drew on clearly identified points of contact to initiate cooperation with another country.

Interagency cooperation in planning and executing operations at the national level was both a success factor and a positive outcome of the operational management strategy that guided this Operation, leading to a holistic approach to marine pollution and better outcomes in many instances.

The shortage of specialized capacities and resources was a key challenge in several countries, where there was a strong willingness and commitment to work proactively towards a sound operation, but officers were hampered by poor resources, lack of intelligence systems and capability to track vessels, limited knowledge of relevant inspection and investigation techniques. This challenge needs to be addressed as a matter of priority through training and country-to-country expertise sharing in order to further an effective global response to marine pollution.

Intelligence and technologies played a key role in identifying correct operational targets and strengthening monitoring and enforcement capacities, which fostered compliance with environmental regulations. Empowering countries to make a greater use of intelligence systems and surveillance technologies is a strategic priority to advance marine pollution enforcement.

Regional communication and coordination mechanisms greatly facilitated joint operations and speeded up information exchanges. This was apparent in the European region, through the successful partnership with Europol, as well as in North America. Means to promote similar coordination mechanisms at the regional scale in other regions of the world should be explored.

Discussion groups focusing on specific targets or crime types helped interested countries to exchange information and expertise in a more practical way, leading to concrete applications and cooperation.

7.2. Developing a strategic framework and planning the next steps

The roadmap of the INTERPOL Global Marine Pollution Enforcement project draws on the lessons learned from this Operation, building on success factors and addressing key challenges. It also reflects countries' consultations held during the post-operational meeting, which pointed to three strategic components: operations, capacity building, and international cooperation.

Operations

Participating countries expressed their willingness to pursue further marine pollution enforcement operations in 2019. According to a revised strategic approach, the common operational framework would break down into more specific targets reflecting particular crime areas in order to better respond to countries' priorities, streamline efforts and generate more focused analytical results.

Upcoming operational plans will expand the holistic approach to marine pollution crime, encompassing both onshore and offshore dimensions and addressing both direct and indirect pollution events. At the same time, operations should foster some emerging enforcement agendas, by tackling new or so far neglected crime types. The publication of Purple Notices illustrating new modus operandi should increase to support intelligence sharing and innovative investigation techniques.

Capacity building

Operations should be backed by a sound plan for technical capacity development in most countries, facilitated by INTERPOL and PCWG according to the country-to-country expertise sharing approach. Available expertise and capacities (and lack thereof) were mapped through a post-operational questionnaire, which triggered requests for and offers of training and resources among countries and to INTERPOL. INTERPOL will coordinate requests and offers of expertise sharing in the course of 2019 and 2020.

International cooperation

International cooperation is the method through which the two previous set of activities should be implemented. Priority will be given to enhancing the NOCs Marine Pollution Enforcement Network both at the regional and the inter-regional level, with the specific objectives to increase expertise and intelligence sharing, joint operations and cooperation at the investigation and prosecution stages. A variety of initiatives will be undertaken at this end, including online communication hubs, teleconferences, trainings and operational meetings.

Similar efforts will be made to better integrate some regional and international organizations in the next steps of the global coordination of Marine Pollution Enforcement actions. The existing partnership with relevant EU agencies will be strengthened under the EMPACT Action Plan, with a view to duplicating this regional coordination mechanism with police associations, coast guard forums, port state control MoUs and other relevant organizations in other regions of the world.

APPENDICES

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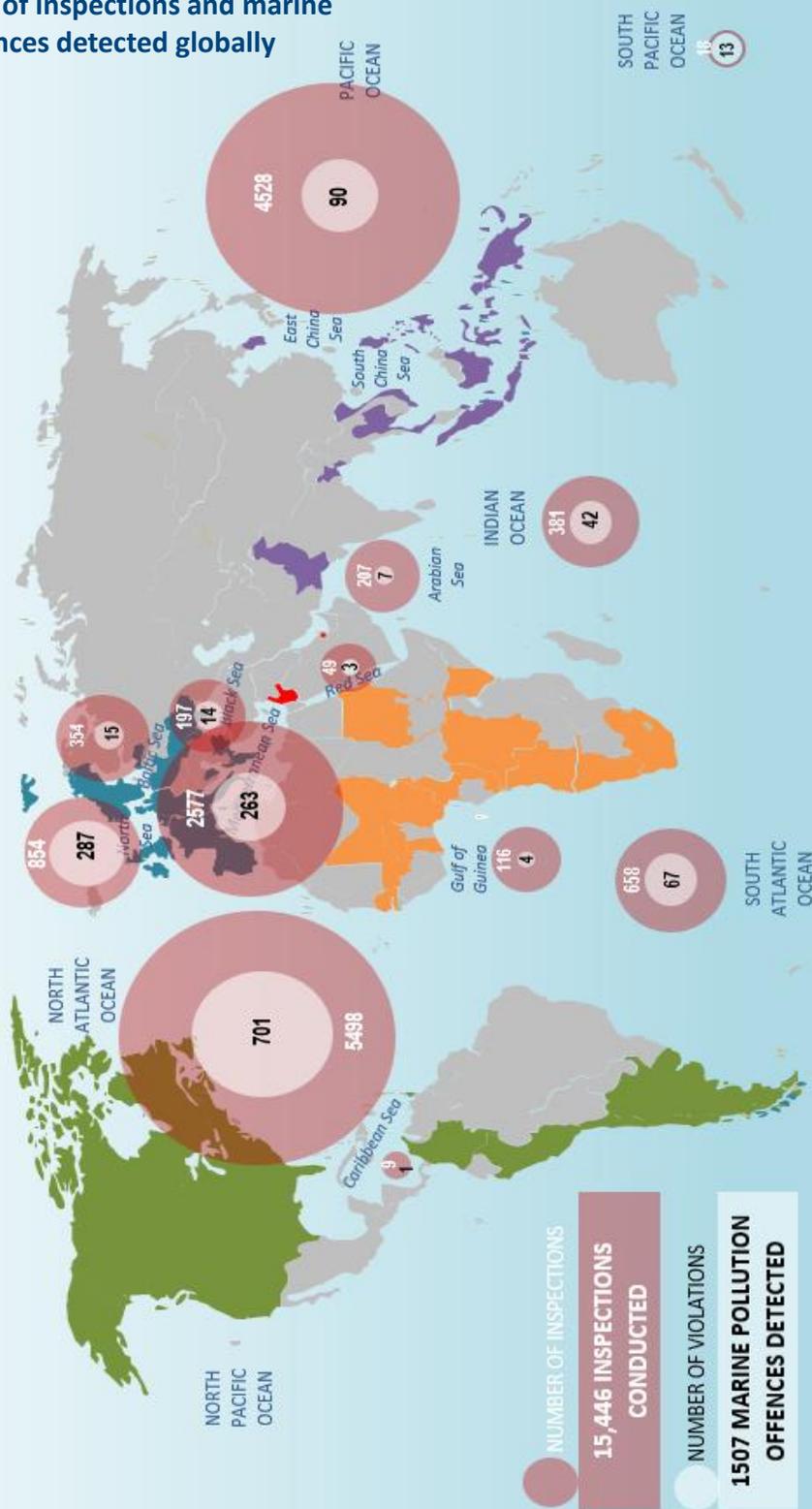
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Annex 2: Map of inspections and marine pollution offences detected globally

INSPECTIONS AND MARINE POLLUTION OFFENCES DETECTED DURING OPERATION 30 DAYS AT SEA



Annex 3: Risk indicators emerging from operational results

The following table (Table 7) aims to summarize the risk indicators that were identified through the analysis of operational results, as described in section V. While considering analytical limitations, law enforcement agencies may consider the following risk indicators when planning for inspection targets in future operations tackling marine pollution crime.

Table 6. Overview of the risk indicators emerging from operational results

Inspection targets suggested by risk indicators		Specifications
Land-based inspections	Target illicit sewage treatment and discharges (sewage treatment plants and other businesses producing waste water), and businesses involving illegal plastic .	Those inspections revealed relatively more cases of deliberate and criminal offences. Those offences might also have one of the greater contamination impact of the marine environment and neighboring communities.
Vessel inspections	Inspecting vessels at port using an on-board inspection checklist	Vessel inspections and surveillance revealed relatively more offences when done at port. Vessel violations mostly result from negligence onboard vessels. Inspections might be more efficient when targeting vessels with general poor condition and/or poor maintenance of onboard systems, equipment and record books. Oil violations appear to be the most common vessel violation globally.
Vessel type	Cargo ships	Cargo ships may be more often involved in vessel violations, especially prone on records violations
	Bulk carriers	Bulk Carriers could present risk for discharges of ballast water
	Fishing vessels	Fishing vessels could be particularly prone to commit oil pollution ; they can also be recruited by bigger vessels and companies, to commit illegal discharges and dumping.
	Oil and chemical tankers	Violations found on such tankers followed the general trends of vessel violations, with oil pollution being the prevalent offence, followed by garbage discharges .
Flag states	Black-Grey Lists of the Paris and Tokyo MoUs , as well as in the Watch List established by the US Coast Guards .	Vessel inspections might target flag state with highest records of violations . Inspectors can consider the Black-Grey Lists of the Paris and Tokyo MoUs , as well as in the Watch List established by the US Coast Guards .
Regional trends regarding marine pollution offences	Africa	Oil pollution, garbage and sewage discharges from both vessels and land-based sources . Vessel offences by negligence .
	Asia-Pacific	Oil pollution and garbage discharges from Vessels . Vessel offences correlated with poor maintenance and condition on-board.
	Europe	Land-based illicit sewage treatment and discharges; Oil pollution violations from vessels .
	Latin America	Oil pollution and garbage discharges from vessels; on-board vessel record violations .
	Middle East	Oil pollution and sewage discharges from vessels seem the most frequent violations (limited dataset to corroborate it).
	North America	Oil pollution from vessels .

ABOUT INTERPOL

INTERPOL's role is to enable police in our 194 member countries to work together to fight transnational crime and make the world a safer place. We maintain global databases containing police information on criminals and crime, and we provide operational and forensic support, analysis services and training. These policing capabilities are delivered worldwide and support three global programmes: counter-terrorism, cybercrime, and organized and emerging crime.



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