

# **OPERATION 30 DAYS AT SEA 3.0**

Report of a global enforcement operation targeting onshore and offshore offences leading to marine pollution (2020-2021)



January 2022

#### ACKNOWLEDGEMENTS

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Front cover image: This image provided by NCB Jakarta to INTERPOL illustrates evidence collection of beach littering events conducted by Indonesian authorities during inspections of beach sites in the framework of Operation 30 Days at Sea 3.0.

### **Executive Summary**

Operation 30 Days at Sea 3.0 was the third INTERPOL global enforcement Operation targeting marine pollution. It aimed at enhancing the global law enforcement response to pollution crimes leading to marine pollution, with the ultimate objectives of improving sea quality and tackling criminal networks involved in these crimes.

The Operation was conducted by 67 countries worldwide and internationally coordinated by INTERPOL, in consultation with its Pollution Crime Working Group, and in cooperation with Europol and FRONTEX in the European region. It followed a first Operation 30 Days at Sea conducted in October 2018 and a second edition in October 2019. Building on lessons learned from this last edition, Operation 30 Days at Sea 3.0 paved the way for a revised global strategy, introducing an intelligence phase followed by a tactical one.

Although this Operation took place in the challenging context of the Covid-19 pandemic, the level of participation, engagement and results by member countries reached unprecedented levels for INTERPOL pollution enforcement operations: 38,138 inspections were conducted and 5,607 offences were detected. Overall, 642 suspect companies and 632 persons of interest were identified.

The analysis of operational results highlighted three key findings.

- The results of Operation 30 Days at Sea 3.0 were significantly higher than the previous editions;
- Inspections have increasingly focused on land-based targets and suspect waste shipments;
- The extended intelligence collection and analysis phase implemented for the first time in the Operation 30 Days at Sea series, proved effective in bearing several positive results.

Most inspections focused on illegal discharges of plastic, oil, waste and other pollutants into rivers and other inland waters. These illegalities also accounted for the majority of offences reported for Operation 3.0. While this emphasis on land-based and river pollution for inspections was consistent with the findings from the previous edition, the results regarding offences indicate a shift from the previous Operations in 2018 and 2019.

Findings from the Operation 30 Days at Sea 3.0 confirmed the conclusions from the previous two operations regarding the profile of offenders: companies remain a central actor in cases of marine pollution. Previous editions of Operations 30 Days at Sea also found that this criminal activity rarely occurs as an isolated environmental offence: in 2020-2021, marine pollution crimes remained strongly connected with other forms of crime, including, but not limited to, organized crime, financial crime, fraud and illegal mining.

In this third edition of the Operation, traditional waste trafficking routes from Europe to Africa and Asia, as well as from Northern America to Asia, remained prevalent trends. Consistently with previous operational results, some countries also reported a number of cases involving transport

of waste within Asia and within Europe. Other routes were identified during this edition but the absence of more information did not allow to determine whether the cases identifed were isolated incidents or indicative of a new trend to smuggle waste.

Despite global trends, regional priorities vary considerably to address the threat of marine pollution. While operational reports from Africa and Europe remained consistent with those from the previous editions of the Operation, reports from other regions suggested a shift in the type of violations investigated and detected.

#### Strategic recommendations

This analysis, coupled with post-operational feedback provided by participating countries, allowed to outline a number of strategic level recommendations to strengthen marine pollution enforcement in the medium-long term:

- Continue to monitor and support ongoing investigations of cases detected during Operation 30 Days at Sea 3.0.;
- Organize follow up operation(s) starting from 2022, based on results observed in Operation
   3.0 and taking into account the evolving situation of the COVID 19 Pandemic;
- 3. Further develop strategic analysis to inform planning of future operations;
- 4. Deliver additional specialized training in preparation for future operations;
- 5. Further improve countries' operational coordination and cooperation through regular operational meetings and expertise sharing.

## **Table of Content**

ACKNOWLEDGEMENTS
DISCLAIMER
Executive Summary
Introduction
Operational Strategy: Objectives and Targets
Key Results
Overview of key results
Offences detected
Law enforcement actions
Modus operandi
Offender profiles
Trafficking routes
Criminal Convergence
Regional Insights
Africa
Americas
Asia and the Pacific (APAC)
Europe
Middle East and North Africa (MENA)
Countries' overall feddback on Operation 30 Days at Sea 3.0
Conclusions
Strategic Recommendations
Annex: Compared results of the Operation 30 Days at Sea series 2018-2021

### Introduction

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 are directly or indirectly economically dependent upon marine products. It also provides business opportunities for transnational and organized crime to thrive, as detected in recent INTERPOL operations, requiring international law enforcement cooperation and concerted action to tackle it.

To address these threats, INTERPOL and its Pollution Crime Working Group (PCWG) launched Operation 30 Days at Sea in October 2018, in cooperation with the European Law Enforcement Agency (Europol) and the European Border and Coast Guard Agency (Frontex). It was the first global operation ever led to focus a law enforcement response to marine pollution. With the participation of 58 countries worldwide, the Operation allowed to detect over 1,500 marine pollution-related offences committed on land, in internal waters or at sea, with subsequent fines and prosecutions in numerous cases.

The variety of enforcement actions taken by member countries shaped a change in INTERPOL's tactical approach to marine pollution enforcement. Such approach moved from a sea-based focus to a wider perspective that also tackles marine pollution from its origins on land and through rivers. This comprehensive approach was reflected in the reviewed scope of the second edition of the Operation 30 Days at Sea 2.0, conducted in 2019, which resulted in increased participation rates and operational results.

Building on lessons learned from the second Operation, the third edition of the Operation 30 Days at Sea 3.0 in 2020-2021 paved the way for a revised global strategy, introducing an intelligence phase followed by a tactical one. Although this Operation took place in the challenging context of the Covid-19 pandemic, the level of participation and engagement by member countries increased with respect to the previous years, resulting in even more offences detected.

This report presents the key results of Operation 30 Days at Sea 3.0, both at the global level and through a breakdown by regions, and it puts such results into the perspective of the achievements of this series of Operations. In closing, this report suggests a set of strategic and operational recommendations to further strengthen enforcement of marine pollution crimes in the future.

### **Operational Strategy: Objectives and Targets**

Operation 30 Days at Sea 3.0 aimed to enhance the global law enforcement response to onshore and offshore pollution offences leading to marine pollution, with a view to enhancing sea quality and tackling criminal networks involved in these crimes. In particular, this third edition of 30 Days at Sea was articulated around three operational targets to breakdown marine pollution enforcement into more specific actions:

- ► Target 1: POLLUTION FROM VESSELS AND OFFSHORE INSTALLATIONS
- ▶ Target 2: LAND-BASED AND RIVER POLLUTION IMPACTING THE MARINE ENVIRONMENT
- Target 3: WASTE TRAFFICKING THROUGH PORTS

Participating countries defined which target(s) to include in their National Operational Plans, based on their national priorities and capacities.

The operational activities were divided into three phases: the intelligence phase, the tactical phase and the post-operational phase, running overall from October 2020 to December 2021.

#### OPERATIONAL PARTNERSHIP FOCUS 1: THE INTERPOL POLLUTION CRIME WORKING GROUP

Since the first edition of the "Operation 30 Days" series, the Executive Board of the INTERPOL Pollution Crime Working Group (PCWG) has been supporting the Operation by providing both strategic and expert technical advice, through bi-weekly conference calls and other regular exchanges, as well as through the delivery of specialized training on marine pollution investigation organized by INTERPOL.

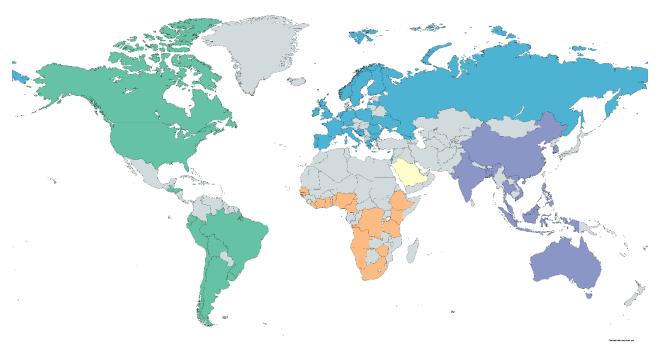
In particular, during the 3.0 operational cycle, the PCWG has supported the development of specific capabilities related to: oil fingerprint library; drones oil sniffing technology for the detection of MARPOI Annex VI violations; oil blending; and shipbreaking investigation. Specialized discussions on these topics have occurred during a number bilateral and small multilateral virtual meetings.

Furthermore, PCWG members have been involved in some concrete cases detected during the Operation. For instance, South Africa was involved in an INTERPOL Investigative Support Team (IST) with Malaysian counterparts on a case of waste trafficking.

### **Key Results**

#### **Overview of key results**

Some 300 national law enforcement, environmental and maritime agencies from 67 countries took part in Operation 30 Days at Sea 3.0, which confirmed the steady increase in participation rate since the start of this yearly marine pollution operation series in 2018<sup>1</sup>.



Map 1: Participating countries in Operation 30 Days at Sea 3.0

<sup>&</sup>lt;sup>1</sup> There were 58 participating countries in Operation 30 Days at Sea 1.0 (2018) and 62 participating countries in Operation 30 Days at Sea 2.0 (2019).

Participating countries					
Africa 16	Americas 11	Europe 24	Asia Pacific (APAC) 13	Middle East North Africa 3	
		Bosnia and			
Angola	Argentina	Herzegovina	Australia	Kuwait	
Benin	Bolivia	Bulgaria	Bangladesh	Qatar	
Cameroon	Brazil	Croatia	China	Saudi Arabia	
Cote d'Ivoire	Canada	Cyprus	Fiji		
Dem. Rep. Congo	Chile	Finland	India		
Ethiopia	Ecuador	France	Indonesia		
Ghana	Guatemala	Georgia	Malaysia		
Guinea Bissau	Honduras	Germany	Maldives		
Kenya	Peru	Greece	Philippines		
Liberia	United States	Ireland	Republic of Korea		
Namibia	Uruguay	Israel	Thailand		
Nigeria		Italy	Timor Leste		
Senegal		Latvia	Vietnam		
South Africa		Malta			
Tanzania		Netherlands			
Zimbabwe		Norway			
		Poland			
		Portugal			
		Romania			
		Russia			
		Spain			
		Sweden			
		Ukraine			
		United Kingdom			

Table 1: Participating countries in Operation 30 Days at Sea 3.0

This Operation saw a significant increase in the participation from African countries compared to the previous edition of the Operation, while participation across the other regions remained consistent with the previous years. The European region remained highly represented and in some European Union countries the Operation was conducted as part of EMPACT Operational Action Plan 2.3 co-led with Frontex and Europol, like in the previous years.

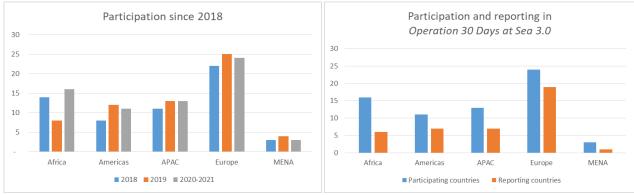


Figure 1: Participation in Operation 30 Days at Sea since 2018

Figure 2: Participation and reporting in 30 Days at Sea 3.0

Operation 30 Days at Sea 3.0 was also marked by significant results with **38,138 inspections** conducted and **5,607 offences detected**. A closer look at the cases reported shows that there were:

- Target 1: 14,223 inspections and 4,194 offences concerning pollution from vessels and offshore installations, reported by 30 countries;
- Target 2: 19,388 inspections and 1,002 offences concerning land-based and river pollution, reported by 21 countries;
- Target 3: 4,527 inspections and 411 offences concerning waste trafficking through ports, reported by 19 countries.

The analysis of operational results highlighted three key findings.

**First, the results of Operation 30 Days at Sea 3.0 were significantly higher than the previous editions**. Since the beginning of this operational series in 2018, there has been a steady growth in the number of participating countries, actions undertaken and offences uncovered in each Operation, as illustred in the table below. Overall, the operational series 30 Days at Sea (2018-2021) has exposed almost 11,000 marine pollution-related offences through more than 70,000 inspections globally.

Key indicators	30 DaS 1.0 (2018)	30 DaS 2.0 (2019)	30 DaS 3.0 (2020-21)	TOT 2018-2021
Participating countries	58	62	67	n/a
Participating agencies	250	249	300	n/a
Inspections	15,446	17,715	38,138	71,299
Offences detected	1,507	3,789	5,607	10,903

Table 2: Comparative and cumulative results of Operations 30 Days at Sea 1.0, 2.0 and 3.0

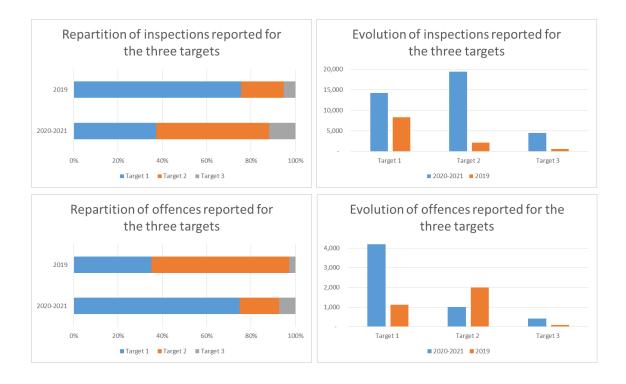


Figure 2: Comparartive tables of inspections conducted and offences reported in Operation 30 Days at Sea 2.0<sup>2</sup> and 3.0

Second, inspections have increasingly focused on land-based targets and suspect waste shipments. The 2019 edition of the Operation registered a large majority of inspections related to pollution from vessels and offshore installations (Target 1). This remained an important area in 2020-2021 with heightened engagement in this area. However, contrary to 2019, inspections were mainly focused on land-based and river pollution (Target 2) for Operation 30 Days at Sea 3.0. Efforts to detect illegal waste shipments (Target 3) also increased significantly compared to the previous editions. This may be attributed to national strategies aimed at less physical port state controls and MARPOL inspections due to the pandemic (e.g. lockdowns, reduced capacity due to staff illness, quarantine measures imposed on vessels and crew). The trend also reversed in relation to detected offences between Operation 30 Days at Sea 2.0 and 3.0: contrary to the 2019 edition, the large majority of offences detected in the latest operation were sea-based pollution violations from vessels.

Third, the extended intelligence collection and analysis phase implemented for the first time in the Operation 30 Days at Sea series, proved effective in bearing several positive results. Not only

<sup>&</sup>lt;sup>2</sup> The per centages for Operation 30 Days at Sea 2.0 in Figure 2 are based on the results retrieved from countries' complete operational reports. These results may partially differ from those reported in Table 2 for Operation 30 Days at Sea 2.0 due to the discrepancy in the data reported by countries through the summary report and the final complete report, respectively. The summary report accounted for the total number of inspections and offences. The complete report provided detailed information on each case. Not every case reported in the summary report was subsequently reported in greater details in the complete report.

it allowed participating countries to better prepare the tactical phase, as reflected in over 1,600 inspections conducted based on intelligence. It also led to enhanced international cooperation, as illustrated by several cases of information-sharing between two or more countries.

#### **Offences detected**

Participating countries reported 5,607 offenses within the scope of their summary reports. However, complete reports<sup>3</sup> were submitted for only 1,005 cases , which represent the basis for the analysis that follows.<sup>4</sup>

As previously mentioned, most inspections focused on land-based and river pollution that affects the marine environment (Target 2). Although the number of inspections conducted under Target 1 (sea-based pollution from vessel) was lower, this number still increased by 70 per cent compared to the previous operation, thereby suggesting that pollution from vessels remained an important enforcement area for countries in 2020-2021.

**Illegal discharges of plastic, oil, waste and other pollutants into rivers and other inland waters accounted for the majority of offences reported for Operation 3.0**. MARPOL violations (which represented most reports in the two previous operations) were also reported in high numbers, closely followed by illegal sewage treatment. Countries engagement towards tackling waste trafficking through ports (Target 3) increased significantly compared to the previous Operations. Waste trafficking became one of the main offences detected in certain regions (see <u>Regional Insights</u>), suggesting heightened enforcement efforts in that area. Some 16 offences related to medical waste in the context of the Covid-19 pandemic were Reported as well.

All the editions of the Operation highlighted a significant number of cases reported by Italy, whose results accounted for 57 per cent of all contributions in 2020-2021. Similarly to Operation 2.0, the majority of the violations detected in this country during Operation 3.0 were related to land-based and river pollution (470 offenses).

The majority of offences reported were classified as deliberate or out of negligence, while a smaller proportion resulted from poor maintenance. Accidents accounted for only three per cent of the cases. These findings have been very consistent in all three Operations of this series. The figure below illustrates the specific results of Operation 3.0, bearing in mind that there was no information on the reason behind the violation for 13 per cent of cases.

<sup>&</sup>lt;sup>3</sup> Summary reports accounted for all the inspections conducted and offences detected during the Operation. The complete reports however were more detailed reports providing more accurate information on some of the cases detected, usually the most serious ones. The complete reports were used for the purpose of the present analysis as they conveyed qualitative information.

<sup>&</sup>lt;sup>4</sup> The figures in the previous sections are based on the summary reports.

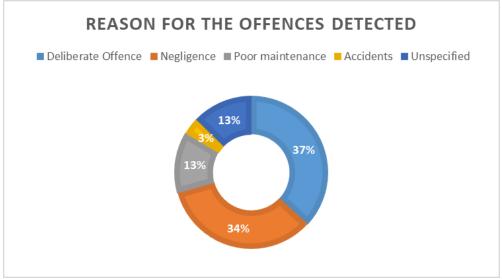


Figure 4: Reason for the offences detected

#### **OPERATION 30 DAYS AT SEA 3.0 IN THE CONTEXT OF COVID-19**

The rise of the Covid-19 pandemic in March 2020 posed significant challenges to the deployment of Operation 30 Days at Sea 3.0 and impacted the operational planning in many aspects. INTERPOL and participating countries strategically adapted to the new context by reviewing the structure, timeline and targets of the Operation. Key adjustments included:

- **Postponement of the tactical phase**: Due to the likelihood of reduced operational capabilities in many countries amid the Covid-19 outbreak, the tactical phase (originally planned to take place in fall 2020) was postponed until March 2021.
- Implementation of an extended intelligence phase and increased focus on intelligence-led operations: For the first time, an operation of the INTERPOL 30 Days at Sea operational series included an extended intelligence phase (five months) in preparation for the tactical phase. This intelligence phase was introduced for two reasons. Firstly, improving the use of intelligence to prioritize key targets was recognized as a key recommendation of the two previous Operations 30 Days at Sea. Secondly, focusing on intelligence gathering and analysis was a resource-efficient solution for those countries struggling with diminished capabilities and resources due to the Covid-19 pandemic.
- New tactical targets related to medical waste: With the surge of hospitalizations related to the Covid-19 pandemic and vaccination campaigns, INTERPOL and Europol risk assessment quickly pointed to the raising risk of increased waste crime involving medical waste. This included potential illegal trafficking, disposal or recycling of medical waste, which poses threats not only to the environment but also to human health, including the tisk of further spreading the virus. Tackling medical waste crime was therefore endorsed as a new target of the Operation.
- Increased focus on plastic waste: Countries were also encouraged to pay increased attention to potential trafficking and mismanagement of plastic waste. As plastic single-use items became more popular during the pandemic due to hygienic reasons, greater volumes of plastic waste were expected to be generated, providing additional opportunities for waste criminals.
- Transition to virtual operational planning meetings: In past operations, operational planning meetings were physical events attended by representatives from participating countries. Due to the difficulty of international travel, all operational planning and post-operational meetings of Operation 30 Days at Sea 3.0 were carried out virtually via videoconference. This was another efficient solution, allowing all participating countries to join meetings, safely and

at reduced costs, and with greater accessibility given the provision of simultaneous interpretation in most INTERPOL official languages.

• Flexibility in participation: Countries were encouraged to participate in the operation in any way that was compatible with their available resources and capabilities. This included the option of further postponing tactical actions beyond March 2021 if required in their countries due to Covid-19 surges (which a number of countries did).

Despite the significant challenges brought on by the Covid-19 pandemic, participating countries adapted quickly, and Operation 30 Days at Sea 3.0 was successfully carried out better than could have been expected.

#### Law enforcement actions

In nearly half of the cases reported in details to INTERPOL (471 out of 1,005 cases), national authorities were able to report and/or arrest one or more individuals, amounting to 632 persons of interest identified in total.

In over half of the cases (555 out of 1,005), national authorities were also able to report one or more suspect company, with up to 7 companies associated with a single offence. Overall, 642 companies were identified.

Following the above identification of suspects, a variety of law enforcement actions were taken by national authorities of countries participating in the operation:

Number of cases	Action taken				
Cases					
143	A follow up investigations was launched				
69	Were notified to other competent national authority (this may include				
	prosecution authorities)				
105	Legal proceedings were initiated				
362	An administrative penalty was issued. Administrative monetary penalties were				
	reported in 334 cases, with values ranging from 100 EUR to 67,000 EUR				
27	A written or verbal warning was issued				
56	Subject to seizure				
30	Repatriation of waste				
5	Arrests were conducted				
9	Vessel deficiencies were noted				
4	Vessel was subject to detention				
111	Multiple actions were undertaken				

Table 3: Law enforcement actions taken following Operation 30 Days at Sea 3.0

### Modus operandi

#### **Offender profiles**

Results from the Operation 30 Days at Sea 3.0 confirmed the findings from the previous two operations regarding the profile of offenders: companies continue to be the main suspect in cases of marine pollution-related crime. The latest Operation exposed 204 companies and 138 vessels. An additional 192 entities were reported by countries as being involved in various offenses (without specifying if companies or vessels).

As multiple corporate actors can be involved in maritime transport, several firms can be affiliated to one shipment. It is therefore reasonable to assume that several hundreds of companies were likely involved in all the offences detected within the scope of the Operation. More precisely, INTERPOL analysis suggests that private companies would represent the offender in more than 65 per cent of the cases, which would be reflective of the the key role played by corporations in perpetrating marine pollution. However, insufficient information on the type of companies and type of vessels implicated limited the extent of the analysis.

Only four countries highlighted the involvement of organized crime in 13 cases. The relatively low number of cases reported to have links with organized crime is consistent with the previous years and may result from two key factors.

First, the focus of the Operation: organized crime has been rarely found involved in pollution from vessels and offshore installations (Target 1), which is rather a corporate crime as recalled above. It is rather on cases involving land-based pollution (Target 2) and waste trafficking (Target 3) that organized criminal groups (OCGs) may have more largely infiltrated the industry (see Box 3). In fact, the 13 cases reported in connection with organized crime involved illegal waste management and dumping on land (including in coastal areas) and waste trafficking.

Second, the timing of reporting. Operational reports were due a few weeks after the conclusion of the tactical phase, a time frame too short to allow criminal investigations to unfold and establish the involvement organized crime. Such investigations often takes years, and in some countries the Public Prosecutor forbids the release of any data until the trial is concluded. Therefore, the limited number of organized crime cases reported so far (13 cases) is not necessarily representative of the actual role that criminal networks may have played.

Cases where the involvement of organized crime was not detected, were reported as criminal or administrative offences in almost equal proportions. Even among administrative offences, a few cases presented possible indicators of organized crime, with the cumulative presence of factors such as the geographical scope (two or more countries concerned) and criminal convergence (financial crime, document fraud). Further information on the level of sophistication of the criminals involved, the resources available to them, the existence of corporations and their locations, and the use of corruption would help in determining whether there were any linkages with organized crime in these cases.

Finally, countries also reported 98 cases without any details regarding the possible involvement of organized crime, including 56 cases still under investigation, which may lead to more links identified in the future.

#### **Trafficking routes**

In this third edition of the Operation, traditional waste trafficking routes from Europe to Africa and Asia, as well as from Northern America to Asia, remained prevalent waste trafficking trends. Consistently with previous operational results, some countries also reported a number of cases involving transport of waste within Asia (from East Asia to Southeast Asia) and within Europe (from West to East).

The previous edition of the Operation (Operation 2.0 in 2019) revealed examples of some emerging waste trafficking routes: within the intra-African market<sup>5</sup>; from the Caribbean region (Colombia, Jamaica, Suriname) to Europe and Asia; and from China towards Asias and African countries. Results from 30 Days at Sea 3.0 did not confirm these flows.

There were however several cases where the countries of origin and destination contrasted with more traditional routes:

- From Africa to Asia: two cases exposed plastic waste trafficking from South Africa to Malaysia;
- Within Central America: various types of solid waste was transported from Mexico to Guatemala ;
- From Europe to the Arab Peninsula: four containers serving as waste disposal for car parts totaling more than 22 tonnes were en route from Poland to United Arab Emirates;
- From Europe to South America: plastic waste declared as polystyrene was exported by a waste management operator from Portugal to Brazil where the recipient, acting as an intermediary, was located.

It remains unclear at this stage whether these cases, particularly the last two, were isolated incidents or indicative of a new trend to circulate waste.

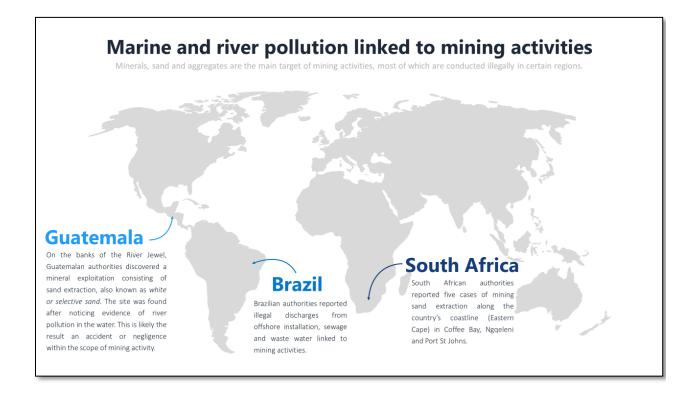
<sup>&</sup>lt;sup>5</sup> Shipments from Burundi, Kenya, Malawi, Uganda and Zambia into Tanzania.

#### **Criminal Convergence**

It is a well-established fact that there is a high degree of criminal convergence of marine pollutionrelated crimes with other serious offenses, particularly with financial crime and document fraud, and occasionally also with corruption and organized crime. Moreover, previous Operations 30 Days at Sea found that marine pollution-related crime rarely occurs as an isolated environmental offence: it often converges with fishery crime, illegal mining, or other pollution violations.

Nearly 30 per cent of the reporting countries in Operation 30 Days at Sea 3.0 corroborated these previous findings by providing details about transversal threats associated with marine pollution.

These results indicate that one in four cases reported is linked to at least one other crime. Document fraud, for instance, continues to appear as the main offense associated with marine pollution, which is consistent with the findings of Operation 30 Days at Sea 2.0. Other transversal criminal threats reported include illegal mining (see Map 1), financial and document frauds, organized crime (including various forms of trafficking), fisheries crime, extortion/violence and corruption.



Map 2: Marine and river pollution linked to mining activities

### **Regional Insights**

While marine pollution crime displays some global trends, enforcement priorities and gaps vary greatly across regions. This calls for an interpretation of the operational results from a regional perspective, to better undertand the specific outcomes of the Operation (Figure 5) and tailor strategies to the different regional contexts.

	Africa	Americas	APAC	Europe	MENA
Oil spills and MARPOL violations	••	• •	•••	•••	٠
Coastal pollution	••			••	••
River pollution	٠	••	٠	••	
Illegal discharges into river from mining activities		•			
Illegal plastic use		٠		•••	
Illegal sewage treatment		•		••	
Waste trafficking			٠	•	

Results from Operation 30 Days at Sea 1.0 (2018)

Results from Operation 30 Days at Sea 2.0 (2019)

• Results from Operation 30 Days at Sea 3.0 (2020-2021)

Figure 5: Most prevalent offences reported by regions under Operation 30 Days at Sea 1.0, 2.0 and 3.0

While African and European results remained consistent with those from the previous editions of the Operation, reports from other regions suggest a shift in the type of violations investigated and detected. This is particularly true for the Americas, where reports of illegal plastic use and illegal sewage treatment increased in 2020-2021, while in Asia there was an enhanced focus on waste trafficking.

#### Africa

The participation of African countries in the Operation 30 Days at Sea 3.0 doubled from eight countries in 2019 to 16 in 2020-2021. One contributing factor may be that INTERPOL hosted several trainings for African countries (including some virtual sessions during the Covid-19 outbreak), that may have contributed to more awareness about the crime area and the Operation, and therefore enhanced participation. One exemple is the online training focused on investigating vessel pollution violations which counted hundreds of participants and received very positive feedback.

Operational actions, however, remained limited across the region, particularly in the context of enforcement of waste trafficking. This may be due to specific challenges to physical deployment posed by the Covid-19 pandemic, coupled with structural limitations of resources that sometimes affect developing countries. Furthermore, waste enforcement requires a specialized technical expertise that is sometimes limited in some countries: in fact, several African countries expressed

the need for specialized training in this area in response to a strategic assessment questionnaire recently administered by INTERPOL.

According to six African reporting countries, the most prevalent offences in the region were:

- MARPOL violations: 34 cases
- Oil spills: 12 cases
- Coastal pollution: 5 cases

#### Americas

Similarly to the previous edition, 11 countries from across the Americas joined Operation 30 Days at Sea 3.0. Once again, these countries were primarily concentrated in North and South America, while Central America and the Caribbean remained underrepresented this third edition of the Operation.

Land-based and river pollution continued to be largely reported in comparison with pollution from vessels and waste trafficking. However, cases of river pollution linked to illegal discharges from mining activities were far less frequent in Operation 3.0 compared to the previous Operation 2.0.

The most prevalent offences identified in this region through the reports of seven participating countries were:

- Illegal plastic use: 17 cases
- Illegal sewage treatment: 14 cases
- Illegal discharges of plastic, oil, waste and other pollutants into rivers and inland waters: 5 cases

### Asia and the Pacific (APAC)

Some 13 Asia-Pacific countries joined Operation 3.0, as they did also in the two previous editions. While river pollution was among the main offences reported in 2019, it is no longer the case in 2020-2021. However, the region saw an increase in the number of reported waste trafficking cases, which may be indicative of enhanced efforts to curb smuggling attempts.

Based on the reports from seven Asia-Pacific countries, the most prevalent offences were:

- MARPOL violations: 31 cases
- Oil spills: 24 cases
- Illegal import/export of waste: 7 cases

#### **Europe**

Engagement in the European region remained as sustained as in the past editions, with 24 participating countries, almost all of them reporting their cases in full details.

This third edition of the Operation confirmed the results from Operation 30 Days at Sea 2.0, with a continued focus on pollution from vessels and offshore installations (Target 1) as well as river and land-based pollution (Target 2). However, the scope of the main violations reported extended to include waste trafficking (Target 3), which accounted for 57 cases.

Most prevalent offences encountered in th European region were:

- Illegal discharges of plastic, oil, waste and other pollutants into rivers and inland waters: 228 cases
- Illegal sewage treatment: 105 cases
- Coastal pollution: 104 cases
- Illegal plastic use: 90 cases
- Illegal import/export of waste: 57 cases
- MARPOL violations: 56 cases

#### OPERATIONAL PARTNERSHIP FOCUS 2: EUROPEAN PARTNER AGENCIES' ENGAGEMENT IN THE OPERATION

In line with the previous editions of this Operation, INTERPOL, Europol and the European Border and Coast Guard Agency (Frontex) were **partners in the coordination of Operation 30 Days at Sea 3.0** in the European region, in cooperation with the European Maritime Safety Agency (EMSA) and the European Fisheries Control Agency (EFCA).

In Europe, the Operation 30 Days at Sea 3.0 is one of the three operational activities within EMPACT Environmental Crime Operational Action (OA) 2.5 under the Operational Action Plan (OAP) 2020 and OA 2.3 of OAP 2021. Such action plans are undertaken in the framework of the EMPACT cycle 2018-2021, of which environmental crime is a priority. EMPACT is the European Multidisciplinary Platform Against Criminal Threats, a permanent instrument of the European Union to address threats posed by organised and serious international crime.

Frontex acts as action leader for OA 2.5 (2020) / 2.3 (2021), with INTERPOL and Europol being co-leaders.

During the Operation, these partnerships provided significant additional support to participating countries in Europe.

#### Frontex:

Frontex maintained coordination among OA 2.3/2.5 partners throughout the operational period, including through regular partners' meetings. Frontex also actively participated in all operational planning and post-operational meetings relevant to Europe and provided operational support to participating countries from the European region, including:

- Access to Frontex services (including Eurosur Fusion Services) based on countries requests, operational plan, and defined targets;
- The deployment of Frontex aerial assets and other Frontex co-financed aerial and naval assets in the Mediterranean Sea, Adriatic Sea and Black Sea in joint operation and multipurpose maritime operation according to the patrolling schedules and based on risk analysis;
- The provision of potential marine pollution sighting forms to EMSA according to relevant procedures.

#### Europol:

Europol, through AP EnviCrime, supported participating countries in the European region with tactical, operational and strategic support services throughout 30 Days at Sea 3.0, including but not limited to:

- Operational and strategic analysis, including support to concrete cases;
- Access to the SIENA secure channel for information sharing;
- Mobile offices for on the spot support and virtual command posts (VCP);
- Access upon request to Universal Forensic Extraction Devices (UFEDs).

#### EMSA:

EMSA primarily supported the operation in Europe by providing access to the CleanSeaNet service. CleanSeaNet is the European satellite-based oil spill monitoring and vessel detection service, hosted by EMSA since 2007. It analyses satellite images mainly acquired by SAR sensors, but also from optical missions. The main objectives of the service are to detect possible oil on the sea surface including illegal discharges of mineral oil; to identify possible polluters; and to monitor the spread of oil during maritime emergencies.

CleanSeaNet service statistics during the operational phase (1-31 March 2021):

- Total number of images delivered by CleanSeaNet service: 590
- Total number of possible oil spills detected: 367
- Total number of alert reports sent to the coastal States by CSN: 223
- Total number of alert reports sent to the coastal States by CSN that include information on possible polluter: 102
- Average number of possible oil spills detected per million km2: 3.24
- Area covered by CSN service (million km2): 113.11

### Middle East and North Africa (MENA)

Qatar continued to be part of this third edition of the Operation as well as Kuwait. Saudi Arabia joined for the first time. Despite the efforts made by these three countries, in particular to tackle coastal pollution, the limited data set due to the small number of participating countries makes it difficult to assess criminal trends as well as gaps in the region. As a result, it remains unclear what enforcement priorities and capacity building needs exist in this region, which calls for enhanced cooperation with INTERPOL.

### **Countries' overall feddback on Operation 30 Days at Sea 3.0**

Countries participating in Operation 30 Days at Sea 3.0 were invited to complete a post-operational feedback questionnaire, to evaluate INTERPOL management of the Operation and to offer their views on the way forward.<sup>6</sup>

The overall feedback was overwhelmingly positive: 88 per cent of countries stated that the Operation had a medium to high impact on marine pollution enforcement in their country. Precisely, 46 per cent of countries rated the impact as high. Some 80 per cent - 90 per cent of countries considered that the operational plan and guidelines provided by INTERPOL were relevant and clear. All of the operational support documents and activities delivered by INTERPOL were rated as highly useful, particularly those that provided concrete guidelines on how to implement this specific Operation.

When asked how INTERPOL operational support contributed to enhance the number and/or the quality of inspections conducted in their countries, respondents indicated two key points: INTERPOL guided them to focus their efforts towards specific targets and risk indicators; and INTERPOL responded promptly and effectively to countries' assistance requests, thus enabling agencies to extend investigations in other countries.

Moreover, member countries contributed a great deal of recommendations on what steps should be undertaken next as a follow up with the series of Operations 30 Days at Sea. These inputs are presented in the "Recommndations" section of this report.

### Conclusions

The results of Operation 30 Days at Sea 3.0 indicate that the Operation successfully met its objectives, despite the challenges to deployment posed by global COVID-19 pandemic situation. The Operation saw active participation from a growing number of Member countries globally and effective sharing of information on inspections, seizures, arrests and investigations conducted throughout the Operation. As a result, the third edition of the Operation 30 Days at Sea series established a record number of inspections conducted and offences detected.

The stand-out success factors of this Operation include:

• The value of the intelligence phase introduced as the first phase of the Operation. The introduction of an extended intelligence phase prior to the tactical phase of the Operation contributed to better equip the participating countries to combat marine pollution-related offences. Through pre-operational meetings articulated around INTERPOL capabilities and areas of focus (e.g. the development of risk indicators or criminal profiles), Member

<sup>&</sup>lt;sup>6</sup> 25 out of 67 countries participating in Operation 30 Days at Sea 3.0 completed the questionnaire.

countries were able to development their strategy ahead of the tactical phase, identify concrete targets and enhance multi-agency collaboration through intelligence-led policing;

- Sound commitment and high participation of countries globally despite the Covid-19 outbreak. The Operation provided the opportunity to promote and support enhanced cooperation and effective information-sharing between all participating countries. It highlighted the capacity of the law enforcement community to adapt to the existing restrictions and their commitment to fight against marine pollution-related offences;
- Consistency in the organization of the Operation, despite the Covid-19 outbreak. The
  recurrent scope and structure of the Operation may have been conducive to enhanced
  participation, as confirmed by the increasing number of countries involved in the Operation
  and its successful results. Countries are now well aquainted with the objectives of this
  Operation, are organized and well equipped to implement it, and consolidated
  communication channels are in place between the INTERPOL Secretariat and key national
  stakeholders. INTERPOL should continue to promote this Operation and increase efforts to
  engage those regions with lower participation rate (e.g. North Africa and the Middle East)
  or under-reporting (e.g. Africa).

### **Strategic Recommendations**

Inputs from participating countries, coupled with the operational results analysed in this report, outline a **potential five-step roadmap for INTERPOL to strategically address marine pollution crime in the medium-long term**:

- 1. Continue to monitor and support ongoing investigations of cases detected during Operation 30 Days at Sea 3.0.
- 2. Organize follow up operation(s) starting from 2022, based on results observed in Operation 3.0 and taking into account the evolving situation of the COVID 19 Pandemic. A specific input for a follow up action is to use the current global Operation as a framework for smaller operations with more specific and more diversified target areas, in accordance with national priorities. It was also recommended to adopt greater focus on combating coastal and land-based pollution crime.
- 3. Further develop strategic analysis to inform planning of future operations, specifically:
  - Follow up on the successes and challenges that each country has experienced in combating pollution crimes and come up with tailored strategies to disrupt criminal organizations;

- Identify and share indicators that help to drive investigation regarding transnational pollution crime;
- Analyze new modus operandi to better understand the evolving behaviours of pollution criminals.
- **4.** Deliver additional training in preparation for future operations, including in the form of a train-the-trainer programme. Training may include guidance on equipment to use onsite for pollution forensic and training on the use of Unmanned Area Vehicle (UAV-Drone).
- 5. Further improve countries' operational coordination and cooperation through regular operational meetings to share real time updates and the circulation of successful practices in the prosecution of cases.

Key indicators	30 DaS 1.0 (2018)	30 DaS 2.0 (2019)	30 DaS 3.0 (2020-21)	TOT 2018-2021	
Participating countries	58	62	67	n/a	
Participating agencies	276	249	300	n/a	
Inspections	15446	17715	38138	71299	
Offences detected	1507	3789	5607	10903	
Detection rate	1:10	1:4.6	1:7	n/a	
Follow up investigations	701	192	143	1036	
Companies reported	76	401	642	1481	
Vessels reported	202	160		1.01	
Individuals reported	36	147	632	2133	
Arrests	n/a	1318		2135	
Fines	n/a	279	334	613	
Prosecutions	n/a	104	105	209	
Breakdown by target					
Countries engaged in T1	n/a	38	30	n/a	
Countries engaged in T2	n/a	29	21	L n/a	

# Annex: Compared results of the Operation 30 Days at Sea series 2018-2021

Countries engaged in T3	n/a	23	19	n/a
Countries engaged in more than one target	n/a	28	23	n/a
Countries engaged in all 3 targets	n/a	16	10	n/a
Inspections T1	n/a	8344	14223	22567
Inspections T2	n/a	2123	19388	21511
Inspections T3	n/a	584	4527	5111
Offences T1	597	1121	4194	5912
Offences T2	232	1995	1002	3229
Offences T3	n/a	91	411	502
Participation	30 DaS 1.0 (2018)	30 DaS 2.0 (2019)	30 DaS 3.0 (2020-21)	TOT 2018-2021
Americas	8	12	11	n/a
Africa	14	8	16	n/a
MENA	3	4	3	n/a
Europe	22	25	24	n/a
APAC	11	13	13	n/a
Total	58	62	67	n/a

#### ABOUT INTERPOL

INTERPOL is the world's largest international police organization. Our role is to assist law enforcement agencies in our 195 member countries to combat all forms of transnational crime. We work to help police across the world meet the growing challenges of crime in the 21st century by providing a high-tech infrastructure of technical and operational support. Our services include targeted training, expert investigative support, specialized databases and secure police communications channels.

#### OUR VISION: "CONNECTING POLICE FOR A SAFER WORLD"

Our vision is that of a world where each and every law enforcement professional will be able through INTERPOL to securely communicate, share and access vital police information whenever and wherever needed, ensuring the safety of the world's citizens. We constantly provide and promote innovative and cutting-edge solutions to global challenges in policing and security.



General Secretariat 200 quai Charles de Gaulle 69006 Lyon France Tel: +33 4 72 44 70 00 Fax: +33 4 72 44 71 63

Twitter: @INTERPOL\_HQ YouTube: INTERPOLHQ