



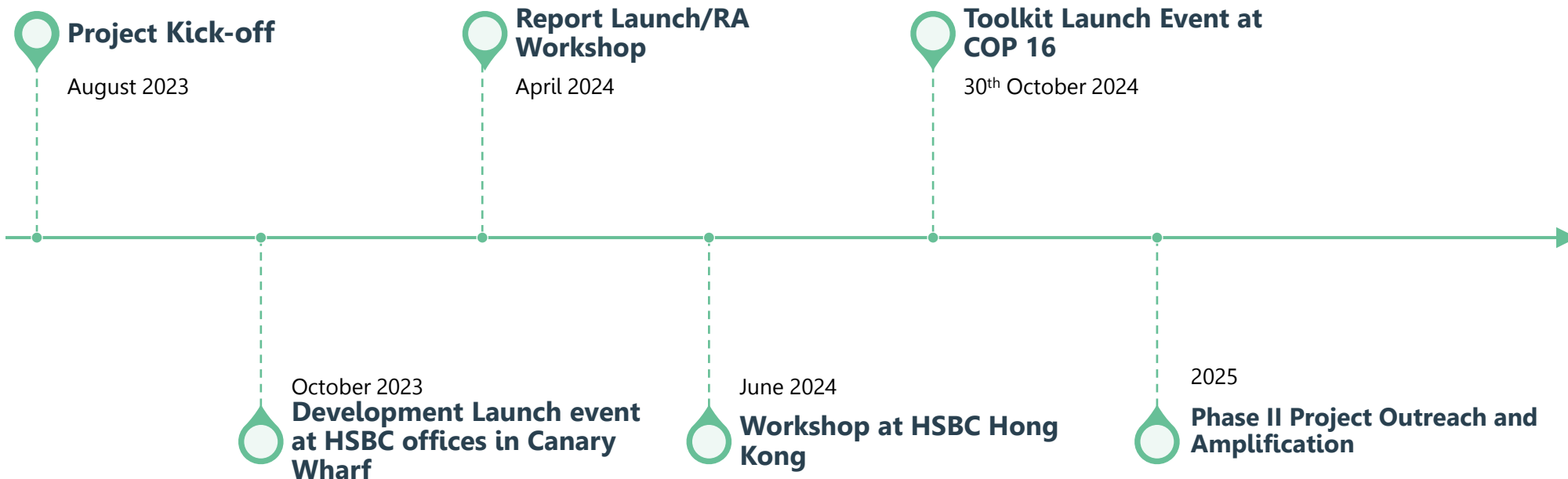
**BRINGING
OUR WORLD
BACK TO LIFE**



NAVIGATING THE ENVIRONMENTAL & FINANCIAL CRIME NEXUS

The Environmental Crimes Financial Toolkit

THE PROJECT



The toolkit is funded by HSBC's philanthropic [Climate Solutions Partnership \(CSP\)](#). The CSP is a philanthropic collaboration between HSBC, WWF and WRI with a global network of local partners, aiming to scale up innovative nature-based solutions and support the transition of the energy sector in Asia to renewables, by combining our resources, knowledge, and insight. WWF UK is leading the development of this toolkit in collaboration with Themis.

After June 2025, the ECFT has secured support for an additional 3 years.



WHAT IS THE TOOLKIT?

The [Environmental Crimes Financial Toolkit](#) (or simply the “Toolkit”) is an **open access digital platform that assists Financial Institutions (FIs) in monitoring and managing the risks related to environmental crimes, and their links to financial crimes and human rights violations.**



Welcome to the Environmental Crime Financial Flows Toolkit, a comprehensive resource designed to help financial institutions mitigate their risk exposure to financial crimes associated with deforestation and land conversion.

The toolkit currently focuses on deforestation and land conversion risk commodities (minerals, timber, cattle, soy, palm oil, cocoa, coffee and rubber) sourced from Sub-Saharan Africa, South and Central America and Southeast Asia and Pacific, outlining the convergence with financial crime. It aims to support financial institutions in assessing their risk exposure to these financial crimes through these commodities, and in addressing and reporting suspicious transactions relating to deforestation and land conversion.



About Deforestation
and Land Conversion-
Linked Financial Crime



Strategic Framework



Country Risk
Assessment



Typologies, Red Flags
and Reporting



Global Voices Tackling
Land Conversion-Linked
Financial Crime



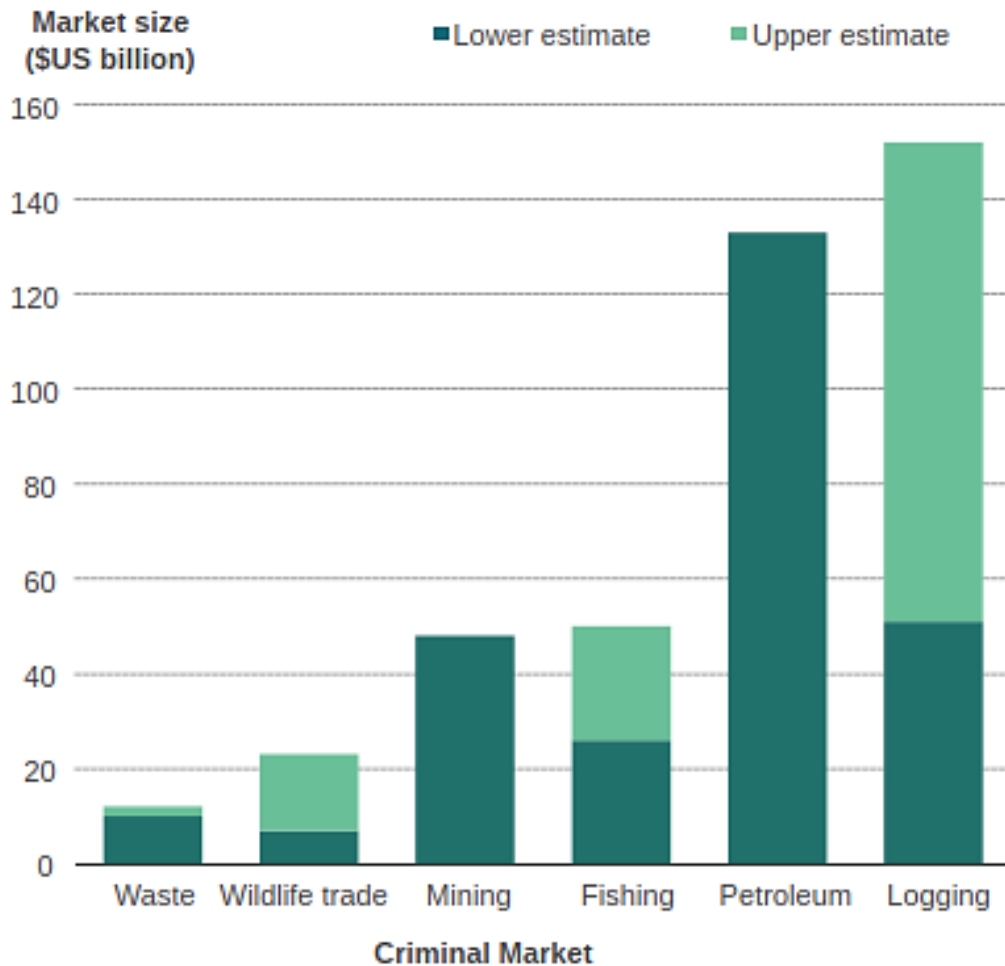
Case Studies



ENVIRONMENTAL CRIMES ARE ECONOMIC CRIMES AT THE CORE



Figure 1: Market size of environmental crimes (sources: TRACIT; FATF)



WHY DO WE NEED THE TOOLKIT?



Environmental crimes have a staggering impact, costing society between US\$110 and \$281 billion annually. This figure is estimated to grow every year 2 to 3 times faster than the global economy (5-7%).



Environmental and financial crimes often converge. Our reports on [land conversion](#) and [IWT](#) shows how environmental crimes (Such as IWT, IM, deforestation...) often converge with financial crimes (tax evasion, fraud, bribery, corruption, money laundering...) and human rights violations.



FIs face heightened exposure due to providing capital, credit and other financial and banking services to clients in high-deforestation-and-land-conversion-risk commodities (such as cattle, soy, palm oil, timber, and minerals) and to high-risk sectors for IWT and IM.



The regulatory landscape is changing, and fast, with new rules on deforestation, trade, biodiversity loss, and human rights violations tied to land conversion and global supply chains (EUDR, UKDD...)

PHASE 1 – THE PILOT



GOAL

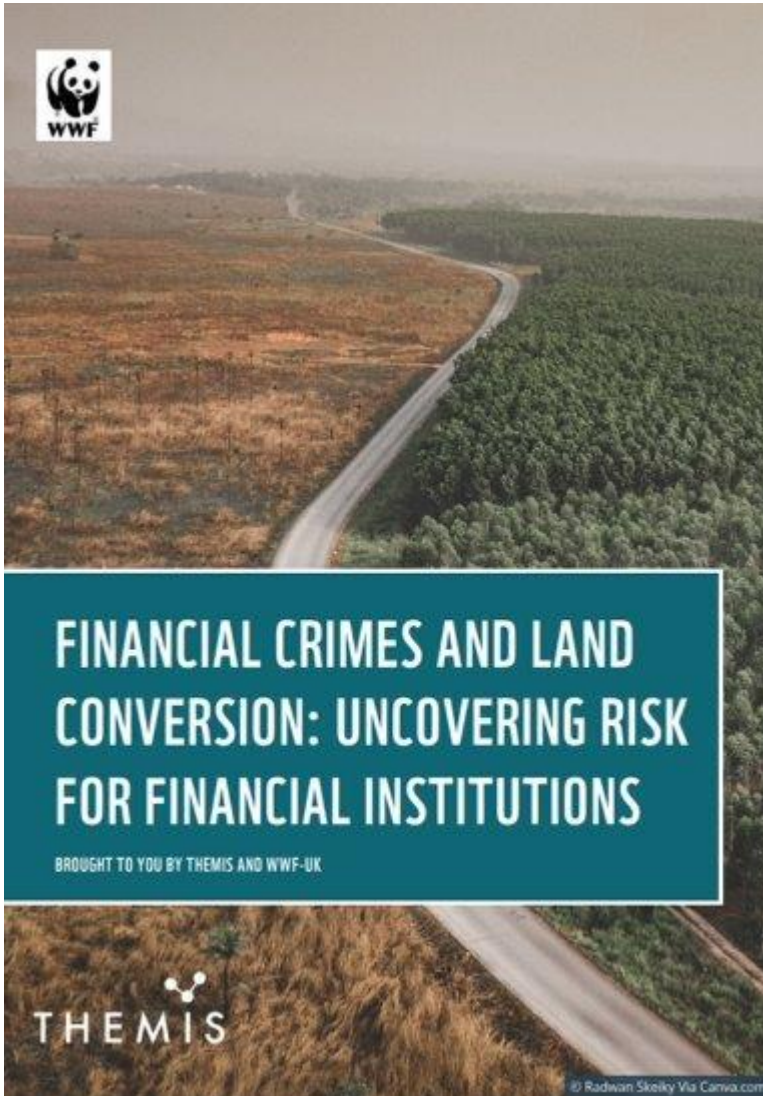
Building a working proof of concept for the platform, based on needs and feedbacks from FIs



THEMATIC FOCUS

Deforestation & Land Conversion - Highlight how and why this is relevant for financial sector

GLOBAL REPORT ON FINANCIAL CRIMES AND LAND CONVERSION



This report highlights the **increasing intersectionality of environmental crimes** linked to deforestation and land conversion, **with financial crimes** (including bribery, corruption, forgery, money laundering, tax evasion, and fraud) **and other predicate crimes** (such as human rights violations, as well as human, drugs, and wildlife trafficking)

There are plenty of **real-world case-studies**, showing how crime convergence looks like in practice

The report includes **results from a survey of 644 financial services professionals** from across 17 countries. **Over 60% of financial services professionals surveyed said that a land conversion risk policy was either non-existent (45.7%) or not yet developed or in place (18.6%) in their firm.**

GLOBAL REPORT ON FINANCIAL CRIMES AND LAND CONVERSION



The [global report](#) is available in English, and in 6 more languages.

SPANISH



DELITOS FINANCIEROS Y CONVERSIÓN
DE TIERRAS: REVELAR EL RIESGO
PARA LAS INSTITUCIONES
FINANCIERAS

BROUGHT TO YOU BY THEMIS AND WWF-UK

PORTUGUESE



CRIMES FINANCEIROS E CONVERSÃO
DE TERRAS: DESCOBRINDO O RISCO
PARA AS INSTITUIÇÕES FINANCEIRAS

BROUGHT TO YOU BY THEMIS AND WWF-UK

ARABIC



الجرائم المالية وتغيير استخدام
الأراضي: الكشف عن المخاطر
للمؤسسات المالية

BROUGHT TO YOU BY THEMIS AND WWF-UK

MANDARIN



金融犯罪与土地用途转换：
揭示金融机构的风险

由 THEMIS 和 WWF-UK 呈现

BAHASA



KEJAHATAN KEUANGAN DAN
KONVERSI LAHAN: MENGUNGKAP
RISIKO BAGI LEMBAGA KEUANGAN

DIPERSEMBARKAN OLEH THEMIS DAN WWF-UK

FRENCH



CRIMINALITÉ FINANCIÈRE ET
CONVERSION DES TERRES : DÉVOILER
LE RISQUE POUR LES INSTITUTIONS
FINANCIÈRES

APPORTÉ À VOUS PAR THEMIS ET WWF-UK

THEMIS

THEMIS

THEMIS

THEMIS

THEMIS

THEMIS

WHO ARE WE ENGAGING WITH IN THE FINANCIAL SECTOR?



Financial Service Task Force



HSBC



BARCLAYS



MACQUARIE



NatWest



standard
chartered

BANK OF AMERICA



BNP PARIBAS



بنك الإمارات دبي الوطني
Emirates NBD

Other financial institutions we are engaging with

Deutsche Bank



LLOYD'S
LLOYD'S OF LONDON

CREDIT SUISSE



UBS



ABN·AMRO

citi



Santander

WHO ELSE ARE WE ENGAGING WITH?



united
for
wildlife



Foreign, Commonwealth
& Development Office



**Sustainable
Markets
Initiative**



HM Government



INTERNATIONAL
COMPLIANCE
ASSOCIATION



INTERPOL

TRAFFIC
the wildlife trade monitoring network



UNODC



**BEYOND CONSERVATION:
ADDRESSING ENVIRONMENTAL CRIME, CRIME CONVERGENCE,
AND FINANCIAL SECTOR IMPACTS ON BIODIVERSITY AT COP16**



Environmental crime significantly undermines the Global Biodiversity Framework (GBF) by directly threatening the ecosystems and species it aims to protect – but that is not all. Crimes against nature not only converge with a vast array of financial crimes, but

REGISTER



Official ‘blue zone’ side event on 27/10/2024



IUCN at
CBD COP16



THE TOOLKIT AT COP16



**Official launch of the
Toolkit at Casa Británica on
30/10/2024**



Embajada Británica
Colombia



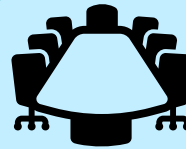
WHAT KIND OF RESOURCES ARE INCLUDED IN THE TOOLKIT?



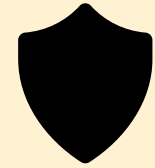
**Reports, publications &
links to external resources**



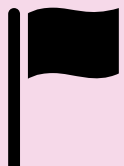
**Strategic policies &
frameworks**



**Country & commodity risk
assessment**



**Crime typologies, red flags
& reporting**



**Global voices from the
ground (videos, podcasts...)**



**Searchable case study
repository**



RISK ASSESSMENT



Risk Map Table

Country name

Argentina

Commodity

Cattle

Search

Clear

The risk assessment table below summarises the key risk areas for the commodity and country selected. These risks are broken down into financial and predicate crimes, human rights abuses, and rule of law. They are presented in red to denote high risk, amber to denote medium risk, and grey where no specific intersection between the commodity, country and crime risk in question has been found. Risks have been assessed both on specific evidence of the intersection of that country, commodity and crime type, and on wider national context, across different stages of the supply chain.

Argentina, Cattle

Types of financial crime	Stage of supply chain		
	Procurement of permits	Supply of machinery and / or equipment	Primary commodity production
Corruption and bribery	Medium risk	Medium risk	High risk
Fraud	No specific intersection identified	No specific intersection identified	High risk
Money laundering	No specific intersection identified	No specific intersection identified	Medium risk
Sanctions evasion	No specific intersection identified	No specific intersection identified	No specific intersection identified
Terrorist and conflict financing	No specific intersection identified	No specific intersection identified	No specific intersection identified
Tax evasion	No specific intersection identified	Medium risk	High risk
Forced labour	No specific intersection identified	No specific intersection identified	High risk
Human trafficking	No specific intersection identified	No specific intersection identified	Medium risk
Child labour	No specific intersection identified	No specific intersection identified	High risk
Environmental crime	No specific intersection identified	No specific intersection identified	High risk
Drug trafficking	No specific intersection identified	No specific intersection identified	No specific intersection identified
Organised crime	Medium risk	Medium risk	Medium risk
Human rights	High risk	No specific intersection identified	High risk
Rule of law Index	Medium risk	Medium risk	Medium risk

You have selected Corruption and Bribery and Supply of machinery and / or equipment

Result Shows:
No specific intersection identified but there is a medium risk of corruption more generally in the country.
In Transparency International's 2023 Corruption Perceptions Index (1), Argentina scored 38/100, ranking 98/180.

In the 2022 WB-WGI Control of Corruption index (28), Argentina scored -0.45 (where -2.5 is the minimum and +2.5 is the maximum, indicating a better governance and thus lower levels of corruption), corresponding to 36.3 percentile rank (where 0 is the lowest rank and 100 is the highest). In other words, an estimated 36.3% of the countries rate worse than this country.

View references

Risk legend:

No specific intersection identified

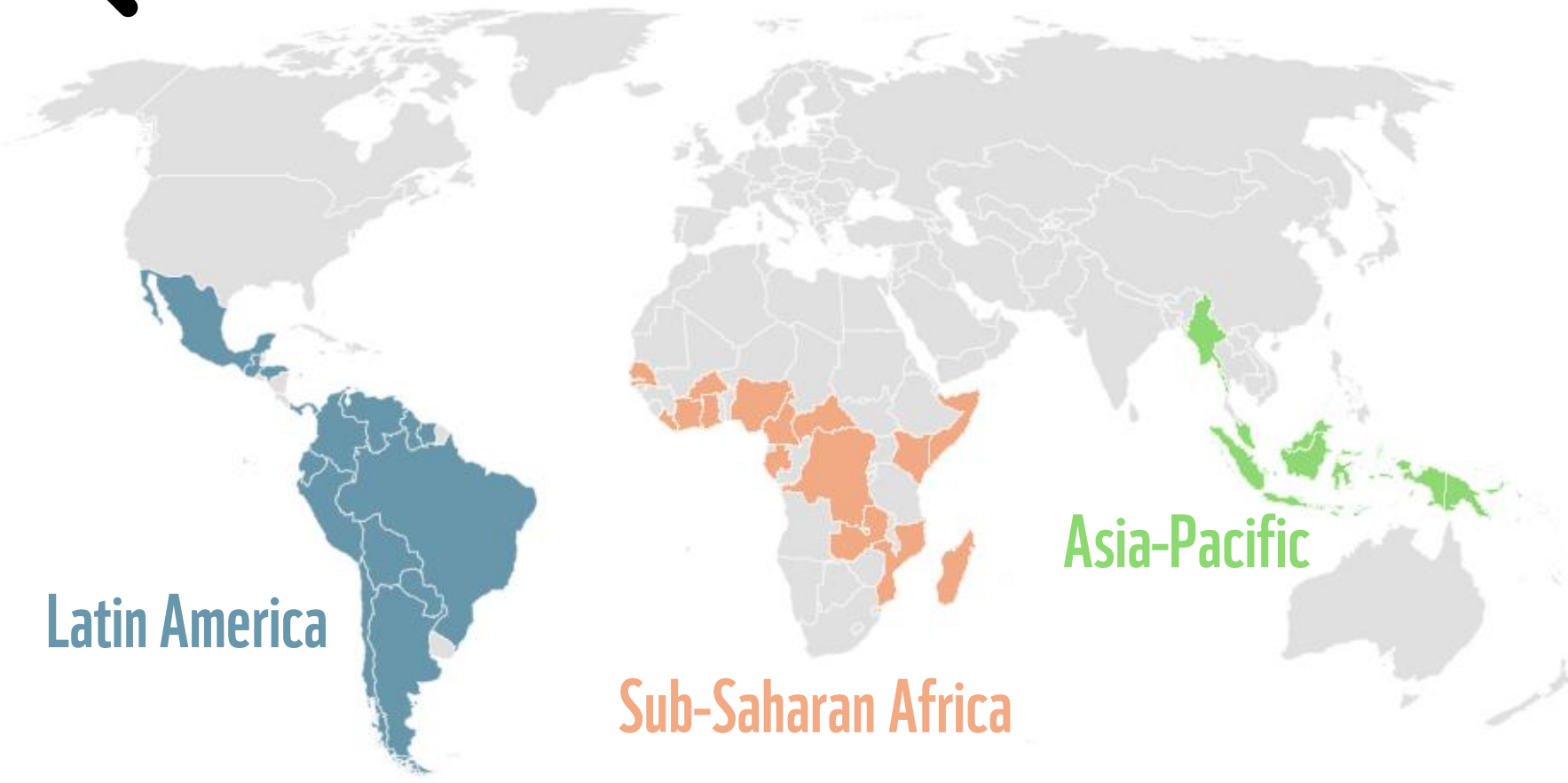
Medium risk

High risk

RISK ASSESSMENT & CASE STUDY REPOSITORY



 **GEOGRAPHIC COVERAGE: 34 COUNTRIES ACROSS 3 MACRO-REGIONS**



SECTORAL COVERAGE:

- CATTLE
- TIMBER
- SOY
- PALM OIL
- COCOA
- COFFEE
- RUBBER
- IWT
- ILLICIT MINING

CRIME COVERAGE: CORRUPTION & BRIBERY, FRAUD, MONEY LAUNDERING, TAX EVASION, SANCTIONS EVASION, ENVIRONMENTAL CRIME, DRUGS TRAFFICKING, ORGANISED CRIME, HUMAN TRAFFICKING, CHILD LABOUR & FORCED LABOUR, TERRORIST AND CONFLICT FINANCING.

RISK ASSESSMENT METHODOLOGY



Country: Cote d'Ivoire
Commodity: Timber
Intersection: Corruption and bribery

Index shows a wider risk of corruption.

Specific intersection identified through desk-based research.

According to a report by the Institute for Security Studies (8), corruption and system weaknesses facilitate unlawful logging in areas designated for timber extraction, most of which are also cocoa-producing areas. In Transparency International's 2023 Corruption Perceptions Index (21), Cote d'Ivoire scored 40/100, ranking 87/180.

Country: Cote d'Ivoire
Commodity: Cattle
Intersection: Human trafficking

No specific intersection identified during desk-based research.

Risk of human trafficking identified in country's agricultural sector.

While no specific intersection identified, according to the US Department of State's Trafficking Report (11), perpetrators of human trafficking (which include transient merchants, herders and non-state armed groups) are known to exploit children in forced labour in agriculture more generally.

Country: Cote d'Ivoire
Commodity: Soy
Intersection: Sanctions Evasion

No specific intersection identified during desk-based research.

No wider sectoral or country-wide risk identified.

No specific intersection identified

PHASE 2 – AMPLIFICATION & SCOPE EXPANSION



GOAL

Cover other important categories of environmental crime and amplify our impact



THEMATIC FOCUS

Illegal Wildlife Trade and Illicit Mining

IWT REPORT LAUNCH

MARCH THE 3RD - DEUTSCHE BANK - LONDON



TACKLING ILLEGAL WILDLIFE TRADE

REGISTER

NEW REPORT & RESOURCES FOR THE FINANCIAL SECTOR

Monday 3 March 2025, 9am-12:30pm

Deutsche Bank, 21 Moorfields, London, EC2Y 9DB

Join us on World Wildlife Day for the launch of our Illegal Wildlife Trade Report, part of our Environmental Crimes Financial Toolkit. Created to support the financial sector, these resources can help you manage risk and exposure to environmental and financial crimes.

Co-created by WWF and Themis, with support from the Climate Solution Partnership, a philanthropic collaboration between HSBC, WWF and WRI. Deutsche Bank is an accessible venue. Please let us know when registering if you have additional requirements.

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ACKNOWLEDGEMENTS



ACKNOWLEDGEMENTS



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Audrey Chambaudet

Colman O'Criodain

Rob Parry-Jones

Brian Gonzales

Our anonymous survey
respondents

NEW REPORT ON IWT & FINANCIAL CRIMES



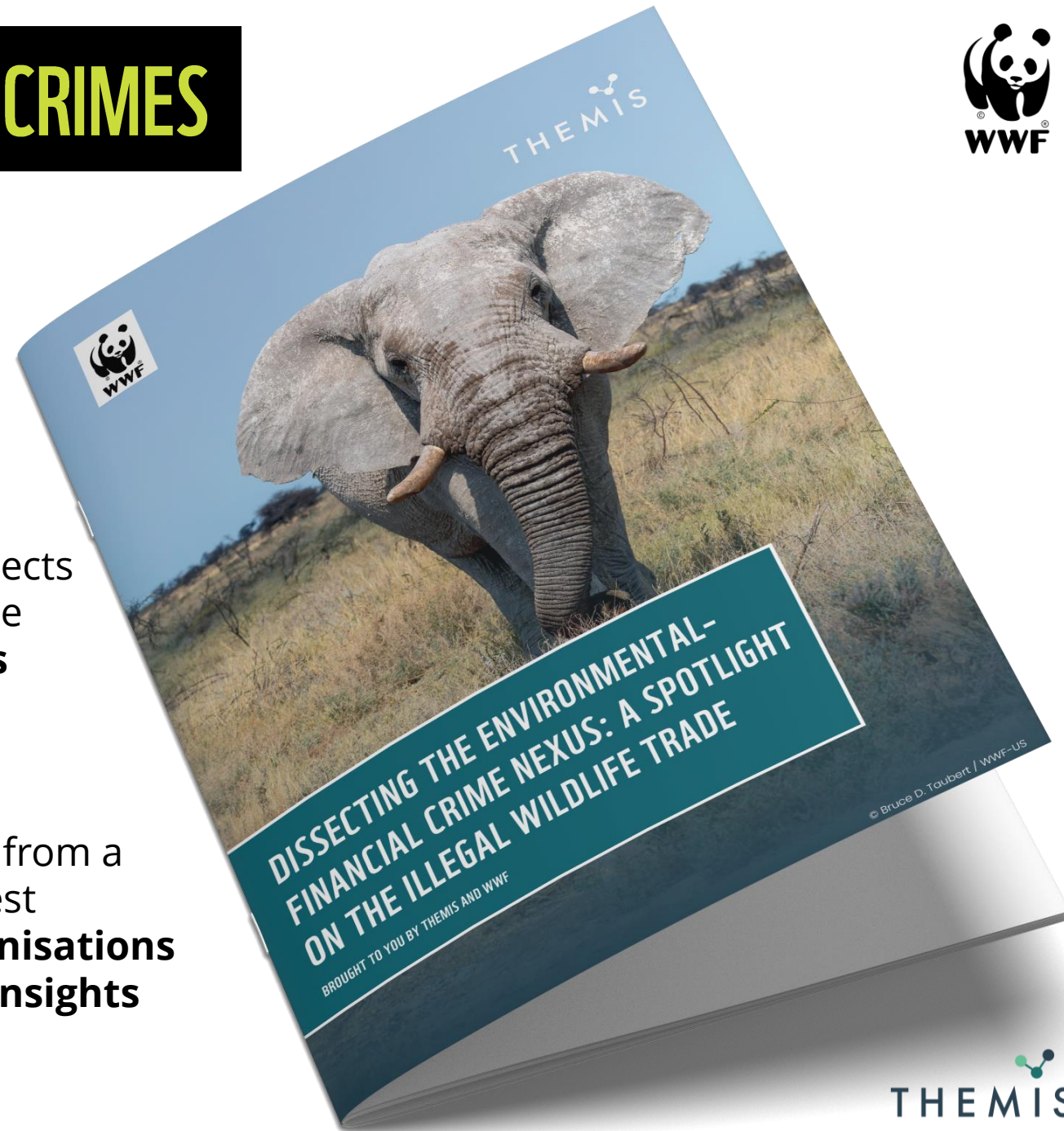
This [report](#) focuses on the **convergence between Illegal Wildlife Trade (IWT) and financial crimes**, which undermines global sustainability and conservation efforts.



It has been written for FIs, leveraging information from an **original survey**. It dissects the complexity of the IWT and financial crime nexus, by **analysing evidence, perceptions and risks for the financial sector**



Led by WWF and Themis, this work benefits from a **series of real-world case studies** from guest contributors, with **global experts and organisations working at the frontline sharing unique insights and potential solutions**.



RISK & EXPOSURE FOR FIs



Three main types of risks:

Regulatory & Legal risk

Reputational risk

Operational Risk



Direct & indirect exposure to high-risk sectors & activities

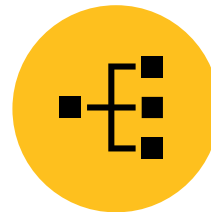
 Extractive industries	 Travel agencies or eco-tourism	 Antiques retailers, trinkets or jewellery	 Timber or logging companies
 Game lodges, wildlife reserves, safari parks, zoos, exotic pet providers or traders	 Foreign currency exchange offices	 Breeding farms, ranches, veterinary services	 Restaurants/food industry (frozen food, nuts, seeds, coffee, tea)
 Companies dealing in motor vehicle spares or second-hand car dealerships	 Suppliers/exporters of any plant, animal or agricultural products, including taxidermy		 Companies dealing in plastic waste or pellets, or marble and stones
 Import-export companies, freight forwarding, customs clearance, cargo, shipping or logistics providers, companies dealing in wood or plastic pallets		 Furniture production companies, fashion and furniture companies that deal in fur, leather manufacturers, producers or importers	
 Medical testing facilities or pharmaceutical products, Traditional Medicine manufacturers or clinics, companies sourcing, importing or exporting traditional medicinal herbs for pharmaceutical use, research institutions studying medicinal herbs and modern pharmaceuticals			

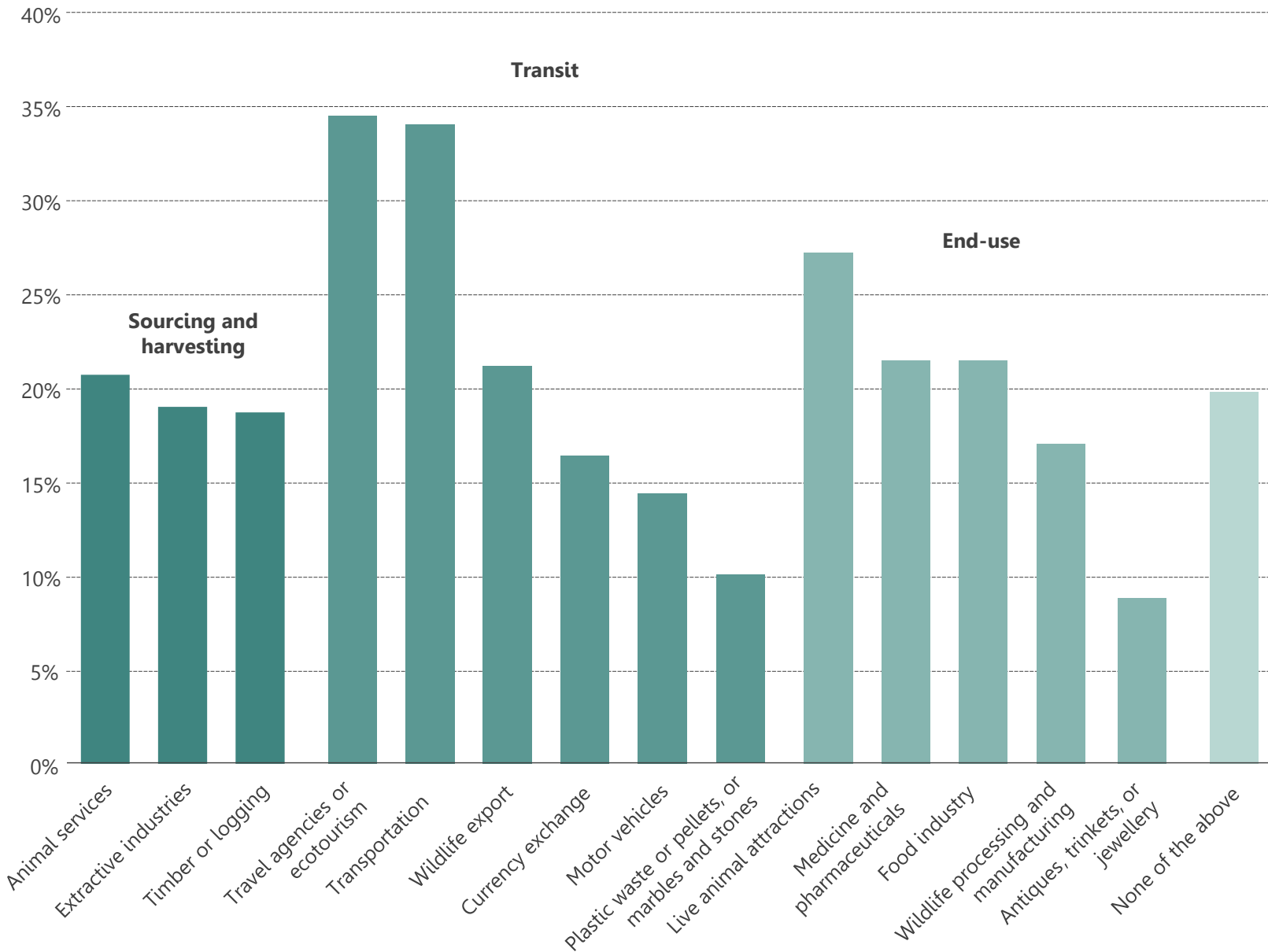


Overarching risk: According to WEF, **US\$44 trillion of economic value globally relies on nature** and its services.

IWT Converges with predicate crimes such as:

- Money laundering
- Fraud
- Corruption and bribery
- Tax evasion
- Sanctions
- Terrorist and conflict financing
- Other environmental crimes
- Serious organised crime
- Drug trafficking
- Human rights violations

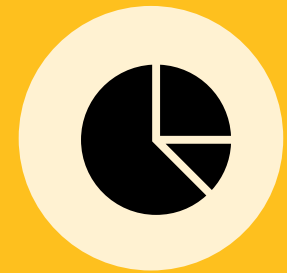




High illegal wildlife trade risk sectors

VULNERABILITY OF THE FINANCIAL SECTOR

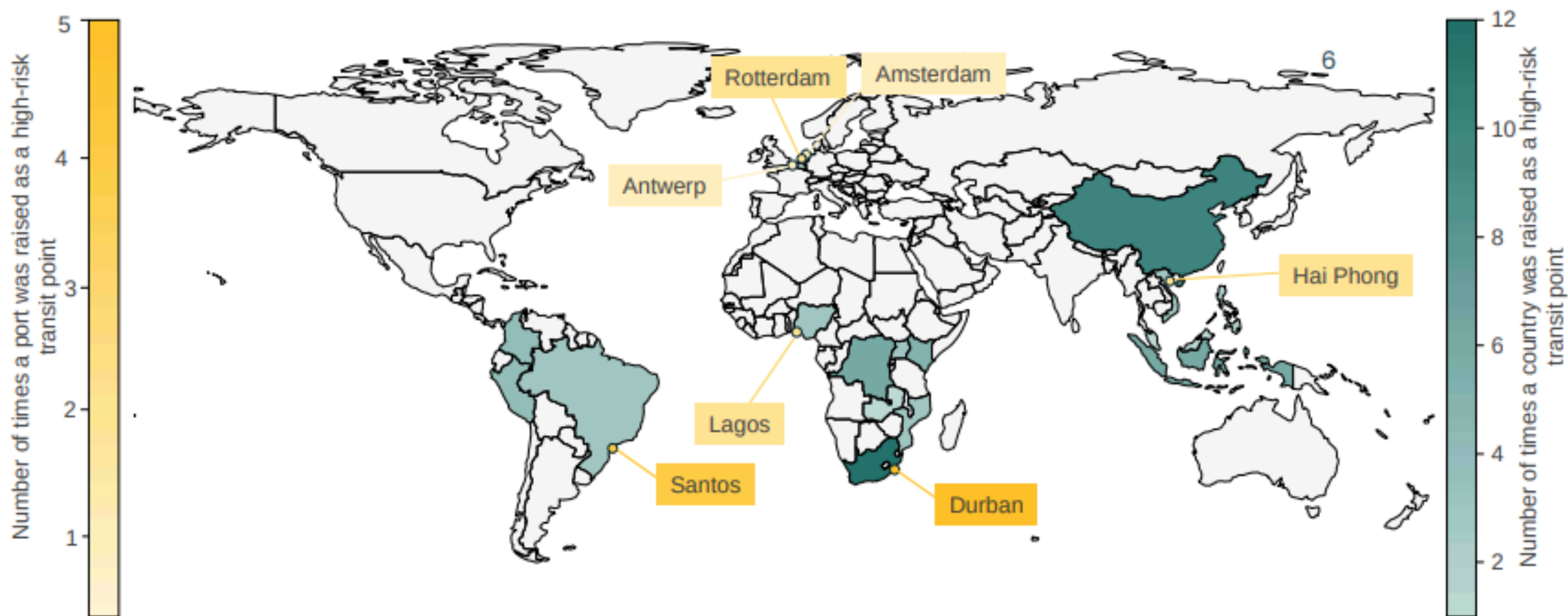
81% of respondents indicated that their organisation operates in at least one high-risk business area for IWT



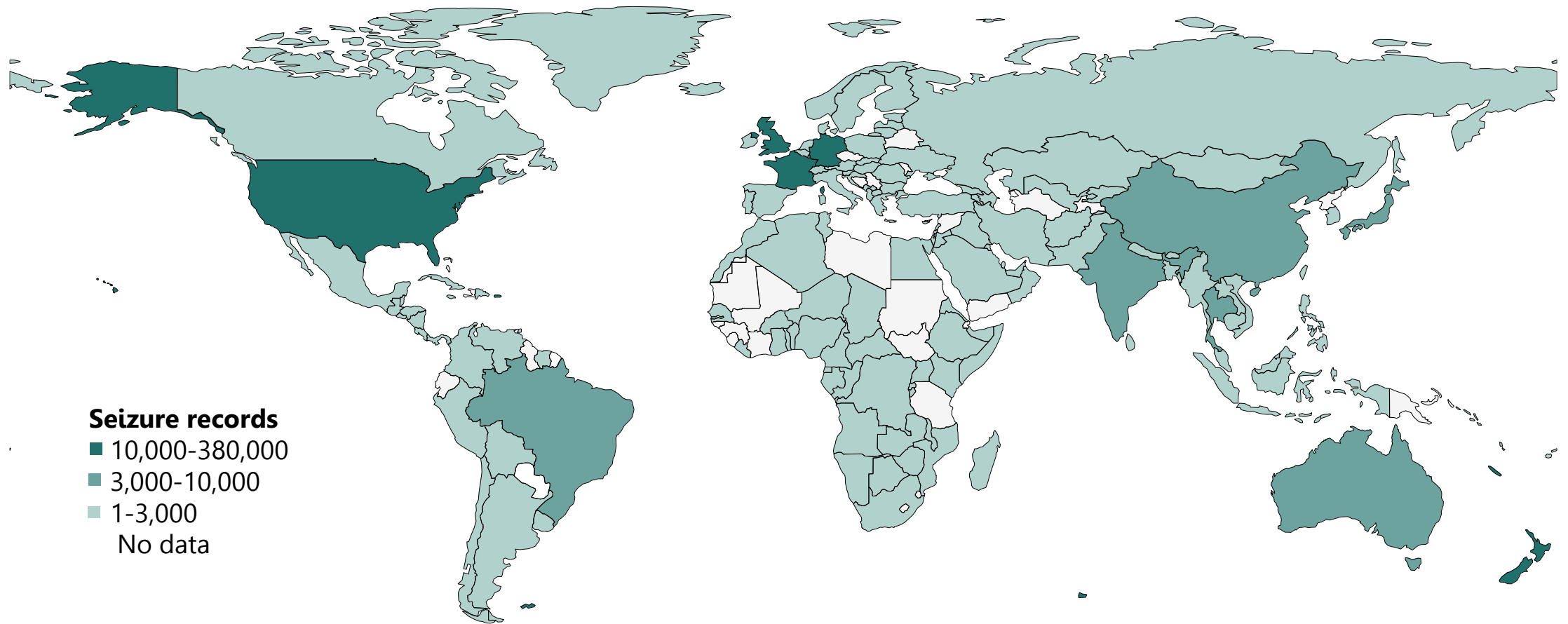
RECOGNISING RISK



Figure 12: High-risk IWT transit ports and countries as perceived by financial institutions⁶



RECOGNISING RISK



RESPONDING TO RISK

Proportion of responses

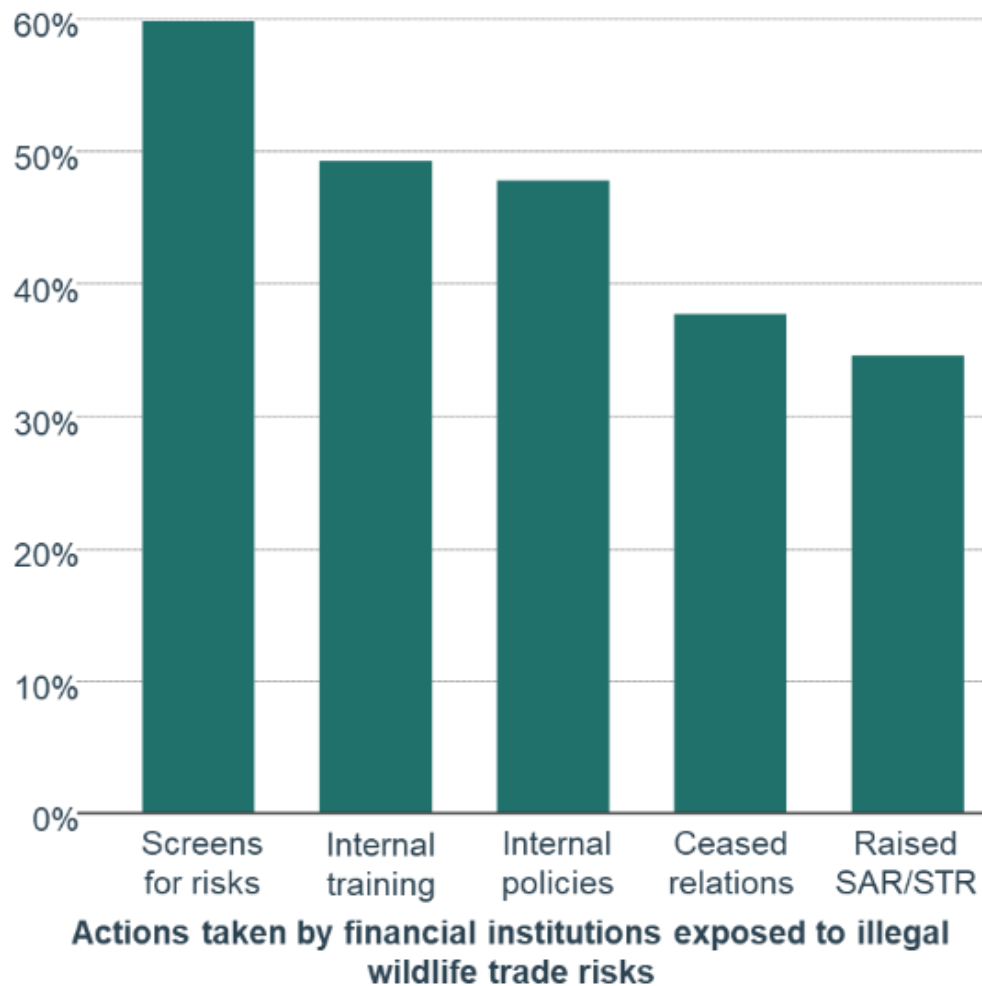
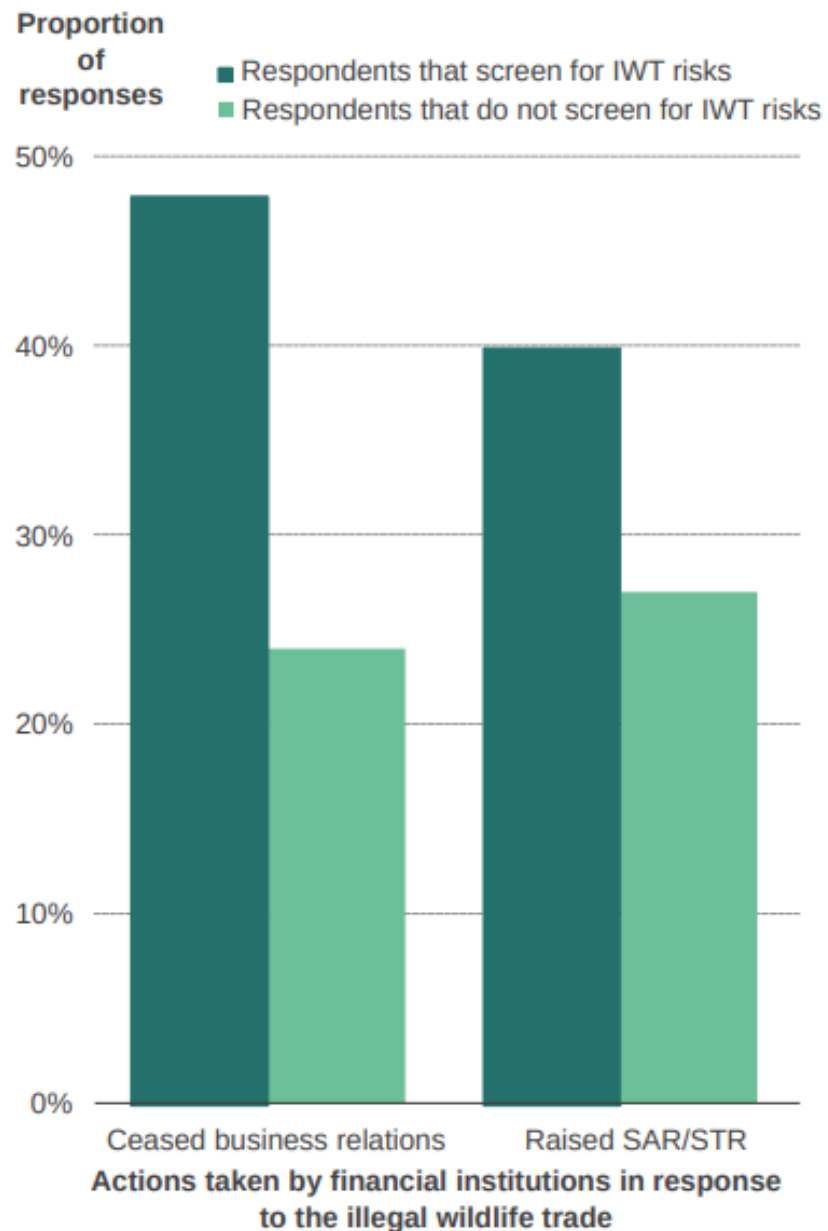


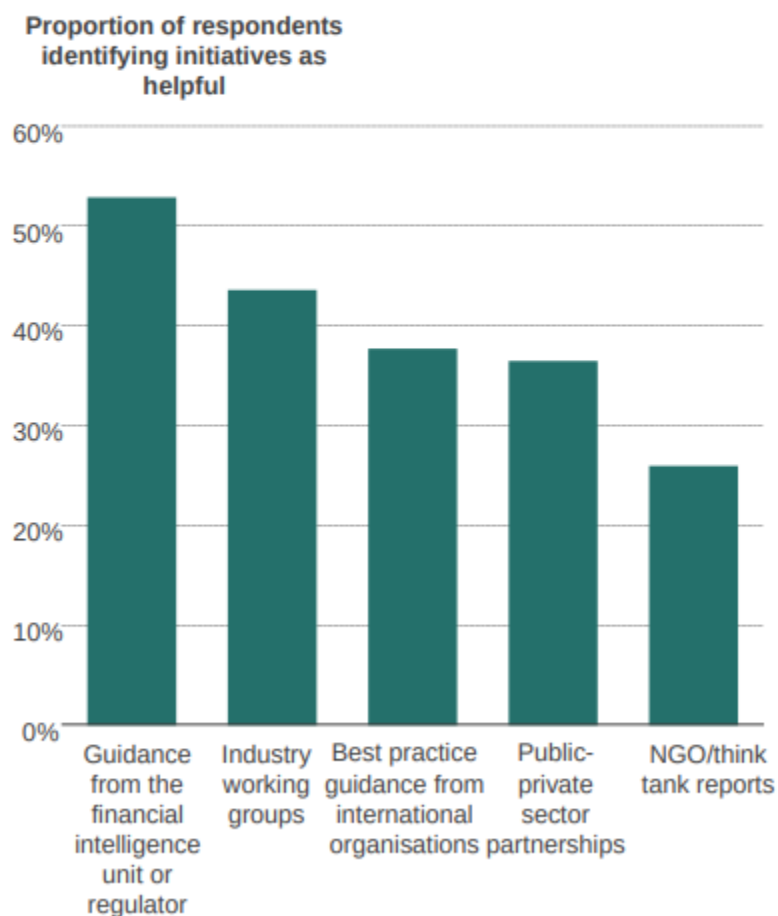
Figure 23: Impact of screening on financial institutions' responses to IWT risks



RESPONDING TO RISK



Figure 28: Helpful external initiatives for addressing IWT as nominated by financial institutions



Respondents across the board found that guidance from their FIU or regulator was the most useful tool for assisting their organisation in addressing IWT risks, demonstrating the critical role that these bodies play in shaping domestic readiness to tackle environmental crimes. Similarly, industry working groups were listed as a prominent helpful source of guidance, which potentially reflects their status as trusted organisations composed of FIs themselves, that therefore understand the specific risks, pressures, constraints and motivators felt by the industry. Fewer respondents nominated NGO and think tank reports as helpful sources, which may suggest that existing resources are insufficiently tailored to FIs' perspectives or needs, or that they are not properly circulated within FI circles.

IMPACT & OUTREACH



+5900

Unique users accessing the Toolkit platform*

+15k

Pageviews*

** Only from 30/Oct/2024 to
31/Feb/2025*

24

1-2-1 demos and tutorials with FIs & professionals in 2024

+200

Attendees to our events & workshops in 2024

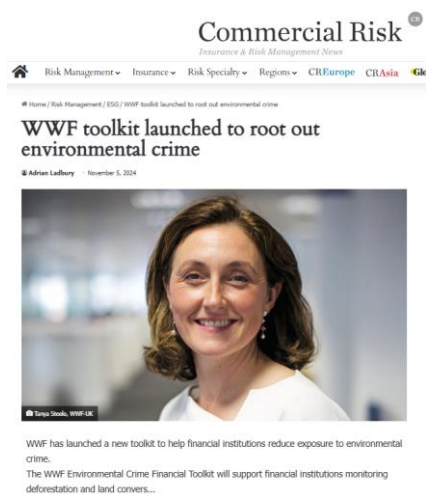
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FIs have provided public statements in support of the toolkit

THE TOOLKIT IN THE PRESS



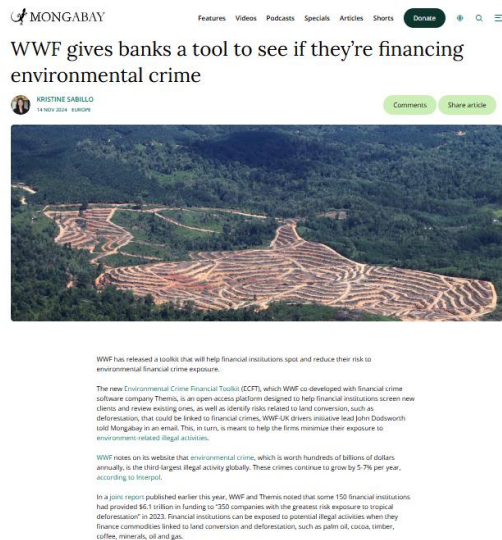
The toolkit has been featured in articles by [Commercial Risk](#), [Fintech Finance News](#), [The Fintech Times](#), [Mongabay](#), [ESG Investor](#), [Business Green](#) and more – and it's all good press!



COP16: New WWF toolkit to help financial institutions reduce exposure to environmental crime

Stuart Storey
30 October 2024 • 3 min read

SHARE



TECHNOLOGY & DATA

New Platform Screens Against Environmental Crime

By ESG Investor
31st October 2024

A new **toolkit** developed by environmental charity World Wide Fund for Nature (WWF) and financial crime software company Themis aims to minimise financial institutions' exposure to environmental financial crime. Launched at COP16, the Environmental Crime Financial Toolkit is an open access platform that seeks to equip firms to detect and monitor illicit activity related to land conversion and deforestation by highlighting red flags and risks connected with different types of environmental and financial crimes. Designed to be integrated with existing systems, the platform aims to help financial



Climate Solutions Partnership

Our five-year Climate Solutions Partnership with the World Resources Institute, WWF and over 50 local partners, continues to support nature-based solutions and energy transition in Asia.

Since 2020, \$105m in funding has been deployed to our NGO partners. The energy programmes have engaged companies across Asia to help set new standards in climate commitments for their industries and mobilised finance to support the uptake of renewables. The nature programmes supported the Asia Sustainable Palm Oil Links programme, focused on promoting sustainable palm oil production, consumption and trade across Asia, and the Nature-based Solutions Accelerator, which supported projects to reach investment readiness.

Through this partnership, we also launched an open-access **Environmental Crimes Financial Toolkit** to help financial institutions detect and monitor activities related to environmental and financial crimes. The first set of tools focuses on commodity-driven deforestation and land conversion.

The toolkit has been also featured in HSBC's [annual report](#) for 2024.

THE TOOLKIT TIMELINE: NEXT STEPS



- **JAN:** 1:1 demo with FSTF members & other FI's to gather feedback on toolkit to improve user experience for phase 2
- **15 JAN:** Present at the Follow the Money working Group.

- **MAR:** London & UK based event.
- Release of IWT report on World Wildlife Day (3rd March)
- Key stakeholder workshop

- **MAY:** Annual Update of Risk Assessment
- **5 MAY:** Technical Workshop with FIs
- **13-14 MAY:** ACAMS the Assembly - Europe
- **8 MAY:** ICA Future of FinCrime & Compliance.

Phase 3 – July 2025

- **SEPT:** Regional workshops & localisation strategy
- The Cambridge International Symposium on Economic Crime.
- **23-25 SEPT:** New York Climate Week

- **10-21 NOV:** COP30 in Brazil for release of updated toolkit platform

Jan 25

Feb 25

Mar 25

Apr 25

May 25

Jun 24

Jul 25

Aug 25

Sep 25

Oct 25

Nov 25

Dec 25

- **FEB:** Development of IWT report and collection of contributions.

- **APR:** Risk Assessment on IWT and Illicit mining developed
- Workshops in Indonesia, China and Hong Kong
- **28-30 APR:** ACAMS the Assembly – Hollywood

- **JUN:** Case study database expanded.
- Phase 2 of the toolkit concluded.
- Annual Financial Crime Conference.
- **26 JUN:** ICA Compliance awards Europe 2025.
- **21-29 JUN:** London Climate Week.
- Release of **the 3rd report** with a focus on illicit mining

Phase 3 – July 2025

- **AUG:** Scoping for new report and new functionalities
- Increased **regional engagement & localisation strategy**

- **9-15 OCT:** IUCN World Conservation Congress.

WHAT'S HAPPENING IN 2025?



Reports

Development and release of 2 new reports on:

- [IWT report](#), released on March the 3rd
- **Illicit Mining (IM)** – release date: June

Contributions confirmed so far from:

- FINTRAC
- TRAFFIC
- UfW/SAMLIT
- FACT Coalition
- Transparency International
- Rainforest Foundation Norway
- Amazon Conservation
- Global Witness
- Institute for International Affairs (IAI)/ESA
- WJC, WRI, WWF Brazil & *more ...*

Events

- COP30
- London event on International Wildlife Day to bring together FIs, regulators, NGOs and experts to hear feedback on the toolkit and release of IWT report.
- Technical workshop with Financial Institutions to deep dive into the tools that are available.
- Event at London Climate Week 2025.
- Session at IUCN World Congress 2025

Platform updates

- Regular update of Risk Assessment and expansion of scope to include IWT and IM.
- The case study database will increase from 160 to 400 case studies, with a new search function to enhance user experience.
- Increased fundraising efforts to build a wider consortium of donors, partners & supporters.

LEARN MORE ABOUT THE TOOLKIT



CHECK OUT THIS 2-MIN VIDEO

<https://youtu.be/6IEsSL5oDDI>

VISIT THE TOOLKIT PLATFORM

<https://wearethemis.com/uk/environmental-crimes-financial-toolkit/>

CHECK OUT THE PROJECT WEBPAGE

<https://www.wwf.org.uk/what-we-do/projects/environmental-crimes-financial-toolkit>