





MAPPING THE IMPACT OF ILLICIT TRADE
ON THE SUSTAINABLE DEVELOPMENT GOALS

ABOUT THE REPORT

On 18 July 2019, the Transnational Alliance to Combat Illicit Trade (TRACIT) in collaboration with the UN Conference on Trade and Development (UNCTAD) organized a forum to discuss the role of illicit trade in inhibiting positive development outcomes and in particular, the implications for the achievement of the UN Sustainable Development Goals (SDGs).

The event featured the launch of TRACIT's report,

Mapping the Impact of Illicit Trade on the UN Sustainable Development Goals.

The TRACIT report investigates illicit trade in 12 key sectors that participate significantly in international trade and are most vulnerable to illicit trade. For each sector, the negative impacts of illicit trade are mapped against the 17 UN SDGs. The sectors include: agri-foods, agro-chemicals and pesticides, alcohol, counterfeit and pirated goods, forestry, IUU fishing, petroleum, pharmaceuticals, precious metals and gemstones, tobacco products, trafficking in persons and illicit trade in wildlife.

This document excerpts the chapter on "SDGs and illicit trade in the agri-food industry".

The full report, Executive Summary and the sector specific chapter excerpts can be found at: https://www.tracit.org/publications.html

ABOUT TRACIT

The Transnational Alliance to Combat Illicit Trade (TRACIT) is an independent, private sector initiative to drive change to mitigate the economic and social damages of illicit trade by strengthening government enforcement mechanisms and mobilizing businesses across industry sectors most impacted by illicit trade.

FOR MORE INFORMATION

This report is available online in PDF format, along with an Executive Summary and ancillary documentation. Visit www.tracit.org/publications.html

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SDGs AND ILLICIT TRADE IN THE AGRI-FOOD INDUSTRY











INTRODUCTION

Illicit trade and the UN SDGs

The UN Sustainable Development Goals (SDGs) lay out an ambitious set of 17 goals to address the world's most acute economic, social and environmental challenges. They cover everything from poverty eradication and zero hunger to clean water, decent jobs and peace. Since coming into effect in January 2016, governments, private sector and civil society have rallied around the SDGs to guide policy, implement investment strategies and allocate funding.

Among the portfolio of tools available to achieve the SDGs is the expansion of international trade.¹ This is because trade has historically proven to be an engine for development, boosting income generating capacity and contributing to unprecedented reductions in poverty levels.² Over the last few decades cross-border trade has expanded significantly, supporting rising living standards across the globe.

At the same time, the expansion in *legal* trade has been accompanied by the alarming emergence of *illicit* trade, with estimates quantifying it and associated transnational criminal activities at between 8 and 15 percent of global GDP.³

From smuggling, counterfeiting and tax evasion, to the illegal sale or possession of goods, services, humans and wildlife, illicit trade is compromising the attainment of the SDGs in significant ways, crowding out legitimate economic activity, depriving governments of revenues for investment in vital public services, dislocating millions of legitimate jobs and causing irreversible damage to ecosystems and human lives.

Mapping illicit trade against the SDGs

Despite the recognition of international trade as an important means to achieve the SDGs, insufficient attention has been given to the substantial impact that illicit trade has on holding back progress.

In order to help governments and business better understand how their efforts to achieve sustainable development must account for the negative forces of illicit trade, this study maps the 17 UN SDGs against the following sectors: agri-foods, alcohol, fisheries, forestry, petroleum, pharmaceuticals, precious metals and gemstones, pesticides, tobacco, wildlife and all forms of counterfeiting and piracy. These sectors were chosen because they participate significantly in international trade and they are particularly vulnerable to illicit trade. Trafficking in persons is also examined as a particularly abhorrent phenomenon affecting supply chains and basic human rights as well as contributing to illicit trade practices.

To the extent that an SDG—or one of the 169 targets established to track progress on the goals—is impacted by illicit trade, this study examines where and how illicit activity undermines progress to achieve it. In some cases, illicit activity is mapped against an overall goal, such as SDG 3 (Good Health and Well-Being). In other cases, a specific target has been examined, such as SDG Target 8.7 (Eradicate forced labor, end modern slavery and human trafficking).

Key findings from the report

The socio-economic impacts of illicit present significant deterrence to all 17 of the SDGs—holding back progress, increasing costs and pushing achievement of the goals further away.

There are notable "macro" impacts where illicit trade cuts deeply across many of the SDGs, undermining achievement of the economic goals for poverty reduction, decent jobs and economic growth (SDGs 1, 2, 3, 4 & 8), and robbing governments of taxable income that can be invested in public services (SDGs 9 & 17). When it generates revenue for organized criminal and terrorist groups, illicit trade undermines goals for peace and stability (SDG 16). Most forms of illicit trade plunder natural resources (SDGs 6, 14 & 15), abuse supply chains and ultimately expose consumers to fake and potentially harmful products (SDG 12).

While findings show that illicit trade poses a threat to all 17 SDGs, nowhere is the nexus as evident than in SDG 16 (Peace, Justice and Strong Institutions) and SDG 8 (Decent Work and Economic Growth).



Illicit trade—in all its forms—stands in direct juxtaposition to SDG 16, by feeding violence and breeding corruption, undermining trust in institutions and the rule of law, and generating enormous illicit financial flows.

Moreover, the links between illicit trade and organized crime are well

established, from human trafficking networks and tobacco smuggling, to fuel theft by drug cartels and the involvement of the mafia and organized criminal groups in the trade of counterfeit products. Perhaps most frightening are links to terrorist financing that heighten threats to national and global security.



All types of illicit trade threaten inclusive economic growth and significantly hinder achievement of SDG 8. Lost taxes rob governments of revenues intended for schools, infrastructure and other public services. Illegal and unfair competition reduces sales and dampens the ability of companies

to create lasting and dignified job opportunities. Taken together, economic leakages across the sectors susceptible to illicit trade create an annual drain on the economy of US\$2.2 trillion and present a triple threat to financing the necessary "billions to trillions" dollar gap needed to reach the SDGs.

Business is a partner for achieving the SDGs

As illicit trade weakens the viability and sustainability of industries, it simultaneously dilutes private sector contributions to achieving the SDGs. For example, illicit trade is a form of unfair competition that undermines private sector contributions to economic growth and employment. It chokes off market growth, sabotages global supply chains, squanders natural resources and endangers market security. Fake products and inferior materials in supply chains harm consumers and tarnish consumer perception of a corporation's social responsibility (CSR) performance. In some cases, it poses significant threats to the safety and security of personnel and facilities, all adding to the increasing costs of doing business. Where proliferating illicit trade creates socio-economic instability, it dampens private sector investment, holds back research and development (R&D) and discourages technology transfer.

For these reasons, the private sector has a vital interest in defending against illicit trade, helping itself across industry sectors and playing an active role in promoting the SDGs.



The Transnational Alliance to Combat Illicit Trade (TRACIT) provides a platform for business and governments to collaborate holistically to mitigate the incumbrance of illicit trade on the SDGs. Mapping the impacts of illicit trade on the UN Sustainable Development Goals is part of TRACIT's

contribution to the partnership approach embodied in SDG 17 and a means by which business, the public sector and civil society—working in partnership—can more effectively achieve the SDGs.

SDGs AND ILLICIT TRADE IN THE AGRI-FOOD INDUSTRY

Illicit trade in the agri-food sector comes in many forms and manifestations, ranging from economically-motivated adulteration (EMA), commonly referred to as food fraud, to large scale smuggling of agriculture products.

Food fraud is the intentional sale of sub-standard food products or ingredients for the purpose of economic gain. It impacts many different types of foods, including meat, dairy products, fish and seafood, fruit juices, oils, honey, spices and wine. Common types of food fraud include substitution or dilution of an authentic ingredient with a cheaper product (such as replacing extra virgin olive oil with a cheaper oil), flavor or color enhancement using illicit or unapproved substances (such as unapproved dyes), and substitution of one species with another (such as the European horse meat scandal).¹

Smuggling of agriculture products is driven by a disparity between the price of a good at its origin and its (prohibited) destination, which includes price differentials deriving from government subsidies. This practice results in significant revenue losses to governments from the circumvention of taxes, tariffs and import/export duties. Additionally, smuggled agricultural goods can have severe knock-on effects on the economy as a whole: The availability of cheap smuggled goods creates unfair competition, constraining domestic markets and local producers. Smuggled agricultural goods can also introduce invasive species, disease-carrying pathogens or contaminants that threaten the health of humans and pose unique risks to the agricultural economy and the trade status of a country's exports.² For example, an outbreak of Exotic Newcastle Disease among poultry in California in 2003 is attributed to smuggled game birds from Mexico. As a result, California poultry farmers incurred eradication costs of approximately US\$168 million.³

Illicit trade in agri-food has wide-ranging effects on countries and regions in all corners of the world:

• In ASEAN, the regulatory and compliance environment has struggled to keep pace with the growing agri-food industry in the region. The high import and export tariffs in countries such as Indonesia and Thailand encourage the smuggling of certain foods and liquors. Further restrictions on import/distribution licensing arrangements, onerous product regulatory standards, and a lack of uniform food security and trade standards result in trade barriers, which create opportunities for criminals to engage in illegal agri-food trade.

- Sugar smuggling has been a problem in Kenya, Somalia, Uganda, Mozambique, Myanmar, India, Sri Lanka, Vietnam, Guatemala and Mexico. For example, in South-East Asia sugar smuggling not only deprives governments of revenue, but also threatens local industries on which local farmers depend for their livelihoods. Confed, the largest organization of local sugarcane farmers in the Philippines, argued that continued illegal entry of cheap sugar "would ultimately gobble up the sugar industry."⁶
- Tea smuggling represents a major strain on Pakistan's finances, one of the
 world's largest importers and consumers of tea. Reports indicate that the illicit
 tea business in the country accounts for more than a third of the total market.
 Consequently, Unilever Pakistan Limited has reported that, "business operations
 and profitability of legitimate commercial importers and packers have been
 severely curtailed."⁷
- The Ivory Coast lost an estimated 125,000 tons of cocoa to smuggling in the 2017-2018 season, equivalent of 9 percent of the harvest.8 These losses are significant in a country where cocoa accounts for roughly 20 percent of exports and where, according to the IMF, a 1 percent change in revenue from exports of the beans can lead to a 0.63 percent shift in government spending.9

Impact of illegal agri-food trade on achieving the UN Sustainable Development Goals

Agriculture constitutes a large portion of most economies' GDP and a healthy agricultural sector is vital to eradicating hunger and poverty. Together with food processing, food retail and food services, agriculture provides nearly 44 million jobs in the EU and annual exports worth over EUR120 billion.¹⁰ Agriculture, food, and related industries contributed US\$992 billion to US GDP in 2015, and 11 percent of total US employment.¹¹ ASEAN countries have witnessed phenomenal growth in agricultural production in recent years: Exports rose from around US\$6 billion in 1990 to approximately US\$50 billion in 2014.¹² This has led to an increase in incomes in the agrindustry across the region and considerable economic growth.

Consequently, strong, legal agricultural trade is crucial to achieving several SDGs, especially in developing and emerging economies. This, in turn, results in better quality of life, ¹³ drives trade, investment and industrialization, and thereby creates jobs, security and overall economic prosperity. ¹⁴

Conversely, illegal agri-food trade globally undermines farming and global food trade systems, destabilizes rural economies and jeopardizes production and delivery of fair, safe and sustainable food supplies.¹⁵

The illicit trade in agri-foods impacts achievement of six of the SDGs:

- SDG 1 (no poverty);
- SDG 2 (zero hunger);
- SDG 3 (good health and well-being);
- SDG 8 (decent work and economic growth);
- SDG 12 (responsible consumption and production); and
- SDG 16 (peace, justice and strong institutions).

Promoting good health and ending hunger and poverty







The prevalence of illegal agri-foods and the negative impacts on food sustainability are significant risks to some of the most urgent goals. Access to healthy and affordable food are prerequisites for addressing global poverty and hunger. Illicit trade in agri-food contributes directly to food insecurity, poverty and malnutrition by contaminating, counterfeiting and adulterating food products.

Fake infant milk powder, vegetable oil made of recycled oils unfit for human consumption and formalin—an embalming agent—used to keep meat and fish free from flies and seemingly fresh for days, are all examples of how adulterated food supplies can contribute to malnutrition. ¹⁶ Illicit trade in agriculture perpetuates the vicious cycle of hunger and poverty, resulting in stunted human development and shorter, less productive lives.

Developing countries and low-income communities, which lack strong food-safety control systems or cannot afford to buy safer, but more expensive products, are particularly vulnerable to these illegal practices in agriculture sectors.¹⁷

Illegal agri-food, driven by rapid population growth and increased demand, also may exacerbate unsustainable food production patterns, such as when illegally sourced seafood is fraudulently introduced into legitimate supply chains or when tropical forests not meant for agricultural land are illegally converted to palm oil plantations.

Unsustainable food production patterns contribute to declining arable land, degradation of key ecosystems, natural resource depletion, and deterioration of soil, water and biotic resource bases on which all food production depends.¹⁸

While many incidents of illegal agri-food are associated with economic, environmental and sustainability losses, there are equally as many instances where food fraud has had disastrous effects on health and well-being (SDG 3). Perhaps the most recognized case occurred in China in 2008 when Melamine-adulterated milk was used in the

manufacture of infant formula, leading to six deaths and the hospitalization of more than 50,000 infants. Other examples include the selling of salmonella-contaminated peanuts in the US, causing a nationwide salmonella outbreak that sickened hundreds and killed 9 people. In Spain in 1981, nearly 700 people died and over 20,000 were made ill after consuming rapeseed oil intended for industrial purposes but sold on street markets as "olive oil."

Food fraud conveys a number of severe indirect impacts on human health. For example, long term exposure to low-level toxic contaminants or the continuous omission of active or beneficial ingredients, such as preservatives or vitamins can have harmful health consequences. Likewise, health risks emerge when unlabeled or adulterated ingredients cause consumer allergy, intolerance, or sensitivity. Finally, food fraud also deceives some consumers into unknowingly consuming ingredients that would otherwise be avoided for religious or ethical reasons.²¹

Decent work and sustainable economic growth



Fake, substandard, smuggled and illegal agri-foods distort and destabilize food markets and cost the global food industry an estimated US\$30 to 40 billion each year, undermining economic growth, costing jobs and hurting entire sectors of the economy.²² For a legitimate company, this form of illegal competition reduces sales and employment opportunities and disincentivizes investment. This is especially the case for small-scale food producers and those in developing countries.

For example, sugar smuggling by illegal cartels in Kenya has drained tens of thousands of jobs²³ and strips the government of legitimate tax revenues.²⁴ In Asia, Cambodia's rice industry is on the "brink of collapse" due to unfair competition from cheaper illegal rice imports.²⁵ Elsewhere in the region, China and the Philippines report economic damage from illegal rice trade.²⁶

In cases where illegal agri-food trade results in injury or harm, a corporation's economic sustainability can be severely damaged. A study commissioned by the Grocery Manufacturers Association estimates that one adulteration incident can cost a company between 2-15 percent of yearly revenues.²⁷

Incidents of food fraud in a market also may have long-term effects on consumer trust. Once confidence in the food system is lost, even the rumor of food fraud can have far reaching damages. Unsubstantiated rumors of plastic rice on the markets in Africa²⁸ and plastic seaweed in China²⁹ circulating on social media platforms have stoked fear in consumers and damaged the brands, imports and profits of legitimate producers.

Ensure sustainable consumption and production patterns



In addition to its impact on health and economic growth, illicit agri-food also has a knock-on effect on SDG 12. Consumers' ability to make educated and eco-friendly decisions are undermined when certificates of origin are falsified, quality assurance programs hampered, claimed ingredients diluted with a cheaper product or entire species substituted. The practice of seafood mislabeling is a prime example of where food fraud strips the consumer's ability to make informed food choices, while simultaneously threatening ocean sustainability by creating or sustaining markets for illegally sourced fish to be laundered into the legal seafood trade.³⁰

Peace, justice and strong institutions



Organized crime plays a major role in the illicit trade of agri-food products, undermining SDG Target 16.4 (combat all forms of organized crime), as well as SDG Target 16.1 (significantly reduce all forms of violence and related death rates everywhere). In Italy, organized criminal groups are now involved in the commodity value chain of many Italian food products exported abroad.³¹ The Italian "Agromafia" has been known to copy fine olive oil, wine and cheese, fueling an explosion of food crime in Italy.³² This activity has spread to the US market where 75-80 percent of the "extra virgin" olive oil imported from Italy is not extra virgin.³³ Economic activities in the Italian agri-food sector managed by criminal organizations have nearly doubled from €12.5 billion in 2011 to more than €22 billion in 2018, growing at an average of 10 percent a year.³⁴

Given its linkages to organized criminal activity, illicit trade in agri-foods can underpin wider risks to national and regional security, further undermining SDG Target 16.3 (promote the rule of law) and SDG Target 16.5 (reduce corruption). This is especially the case when existing routes and markets for cross-border smuggling of foodstuffs are exploited by criminal groups, including non-state armed actors, for trafficking in high profile illegal goods, such as drugs and arms.³⁵ Examples include the lucrative sugar smuggling business in the Kenya–Somalia borderlands, which have been linked to Al-Shabaab militants,³⁶ and smuggling of subsidized foodstuffs in the Maghreb that finances organized crime and supports global illicit trade networks.³⁷

CONCLUSIONS



Undermines robust and resilient agricultural markets that support economic development and poverty reduction.



Destabilizes food security and undermines sustainable food production and access to food.



Exposes consumers to harmful ingredients or deprives them of active beneficial ingredients.



Siphons GDP, jobs and tax revenues from national economies and introduces health risks that can jeopardize corporate brands and economic sustainability.



Deprives consumers of choice and ability to make educated and eco-friendly decisions.



Illegal profits underwrite smugglers, breed corruption, subsidize wider criminal activity and threaten political and economic stability.

IMPLICATIONS AND NEXT STEPS

The sweeping, negative impacts of illicit trade on the SDGs point to a wide range of challenges for both governments and business. Hence, it will be expedient to:

Attend to developing and least developed countries. The alarming consequences of illicit trade are especially evident in developing countries hard-pressed to monetize resources, commercialize innovation, attract investment, establish lasting job opportunities and create genuine, long-term economic growth. As such, it will be critical to support the capabilities of developing countries to better defend against illicit trade by inter alia taking stock of national government experiences, challenges, priorities and requests for assistance while also identifying where "in-country" efforts would be most valuable and most effective.

Account for the interconnected nature of the challenge. As noted by the UN, the SDGs are integrated and indivisible in nature with significant inter-linkages across the goals and targets. Ending poverty, for example, must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection, job opportunities and environmental stewardship. By the same token, a holistic approach is needed to address the significant number of interdependencies and overlapping problems relating to multiple forms of illicit trade. The impacts of illicit trade cannot be examined effectively in isolation of other sectors, nor can they be addressed in isolation of the SDGs.

Promote shared responsibility. Improving public-private dialogue and promoting partnerships will be needed to address the global nature of illicit trade. Public and private actors can play an important role in determining a responsive, evidence-based work program for addressing illicit trade, including delineation of best practices, and, where applicable, development of regulatory standards.

Prioritize the policy response. The findings from this study demonstrate that illicit trade is a significant deterrent to achieving the SDGs. As governments go about formulating policies and implementing programs to achieve the SDGs, a first order consideration should be to reduce the deterrent forces of illicit trade and plug the fiscal leakages associated with it. This approach has the immediate effect of adding resources and revenues back into the global economy, putting more policy tools back on the table, and reducing timelines, costs and other hurdles to achieving the goals. Consequently, a more level playing field, without the economic drags of illicit trade, can improve the efficiency and effectiveness of policies and programs governments are taking to stimulate growth, employment and investment to achieve the SDGs.

Foster political will and leadership. Addressing the threat of illicit trade on the SDGs will require political will of government officials at all levels to prioritize the problem, actively pursue solutions and invest in enforcement measures. This study provides a first step in raising awareness on the threat of illicit trade on achieving the SDGs. The work also serves as a roadmap to help policy makers identify areas that merit greater attention and to formulate effective strategies to address the serious threats posed by illicit trade.

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ALCOHOL



















COUNTERFEIT AND PIRACY





















IUU FISHING

FORESTRY





















PETROLEUM



















PHARMACEUTICALS





















PRECIOUS METALS AND GEMSTONES



















TOBACCO



































TRAFFICKING IN WILDLIFE















