

CLIMATE AND ENVIRONMENT ASSESSMENT:

Tackling International Corruption in the UK
through Anti-Money Laundering and Anti-
Bribery Enforcement (aka Enhancing
International Action against Corruption,
EIAAC)



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Report Summary

Evidence on Demand was requested by DFID to carry out a climate and environmental assessment as part of the Business Case for ‘Support to Tackling International Corruption in the UK through Anti-Money Laundering and Anti-Bribery Enforcement’ (aka ‘Enhancing International Action against Corruption’, EIAAC). This proposes that DFID will extend support to the Proceeds of Corruption Unit of the Metropolitan Police Service, the Crown Prosecution Service Asset Recovery Unit, the Overseas Anti-Corruption Unit of the City of London Police, and the Intelligence Cell on International Corruption in the Serious Organised Crime Agency. The total additional contribution of £8.526 million would enable the work of these institutions to continue smoothly until the new National Crime Agency is established and the longer-term role of all the units concerned is clarified. The intervention is intended to strengthen the capacity of UK policing institutions in taking action against a number of strategic factors (money laundering, corruption, etc.) that weaken developing countries in the areas of good governance and sustainable development while also aggravating environmental damage and drivers of climate change. The consultant carried out a Climate and Environmental Assessment (CEA) of this Business Case which involved defining the climate and environmental context; applying a Climate and Environmental Sensitivity Analysis (to identify climate and environmental impacts and opportunities); assigning a final risk categorisation; and preparing the climate and environment assurance note.

Note to readers: Climate and Environment Assessments are used to ensure that climate and environment risks and opportunities are considered as part of the process in developing new DFID Business Cases. The CEA presented here is in draft form, as submitted by Evidence on Demand to DFID for quality assurance and approval by a DFID Climate & Environment adviser.



SECTION 1

Strategic Case

The EIAAC intervention is intended to strengthen the capacity of UK policing institutions in taking action against a number of strategic factors (money laundering, corruption, etc.) that weaken developing countries in the areas of good governance and sustainable development, often hitting the poor hardest¹, while also aggravating environmental damage²³ and drivers of climate change⁴. As a major financial centre, London is a particularly attractive venue for money laundering and related crimes linked to cash flows associated with illegal mining, corrupt practices, narcotics, terrorism, etc., so any strengthening of specialised policing capacity in these areas would be welcome. Although environmental crime is mentioned in the Programme Document and draft Business Case, it is further stressed here that a large share of funds that are likely to lead to corruption or to require laundering derive from this kind of criminality, which is very diverse and includes illegal trade in endangered species and wildlife products, illegal and/or undocumented trafficking in ozone depleting substances, dumping and illicit trade in hazardous wastes, illegal, unreported and unregulated fishing, illegal logging and the associated trade in stolen timber, illegal transfer of genetically-modified organisms or potential alien invasive species, and criminal activity surrounding financing for REDD+ programmes and other carbon conservation investments⁵. Attention is drawn to the opportunity to draw on existing knowledge concerning environmental crime that is held by other institutions, so as to raise awareness among EIAAC participants of environmental crime and its major actors and attributes.

1.1 Climate & Environment Assessment

What is the likely impact (positive and negative) on climate change and environment for each feasible option?

The options considered were:

1. **DFID provides no increased funding to EIAAC**, which will therefore lose the opportunity to achieve an upward step change in intelligence and prevention capacity.


¹ http://www.transparency.org/topic/detail/poverty_and_development Transparency International (2010) *The Anti-Corruption Catalyst: Realising the MDGs by 2015, Second Edition*. Policy and Research Department, Transparency International (Berlin).

² <http://www.transparency.org/topic/detail/forestry> Transparency International (2010) *Analysing Corruption in the Forestry Sector*. Forest Governance Integrity Programme, Transparency International (Berlin).

³ <http://www.transparency.org/topic/detail/water> Zinnbauer, D. & Dobson, R. (editors, 2008) *Global Corruption Report 2008: Corruption in the Water Sector*. Transparency International, Water Integrity Network and Cambridge University Press (Cambridge)

⁴ http://www.transparency.org/topic/detail/climate_change Sweeney, G., Dobson, R., Despota, K. & Zinnbauer, D. (2011) *Global Corruption Report: Climate Change*. Transparency International and Earthscan (London & Washington DC)

⁵ *Interpol Environmental Crime Programme: Strategic Plan 2011-2013* (<http://www.interpol.int/Crime-areas/Environmental-crime/Resources>)

- 
2. **DFID provides increased funding to EIAAC**, approximately as specified in the Project Document, viz: (a) £3.446 million for the Proceeds of Corruption Unit of the Metropolitan Police Service (MPS) to investigate money laundering through the UK by overseas political élites; (b) £0.399 million for the Crown Prosecution Service (CPS) Asset Recovery Unit (ARU) to fund dedicated legal capacity to translate money laundering investigations into successful recovery, and meet the UK's international mutual legal assistance commitments; (c) £3.827 million for the Overseas Anti-Corruption Unit (OACU) of the City of London Police (CLP) to tackle foreign bribery; and (d) £0.854 million for the Intelligence Cell on International Corruption (ICIC) of the Serious Organised Crime Agency (SOCA) to provide dedicated intelligence to the MPS and CLP. The total additional contribution of £8.526 million would enable the work of the police units, the SOCA Intelligence Cell and the CPS ARU to continue smoothly until the new National Crime Agency is established and the longer-term role of all the units concerned is clarified through that process.

The intervention is designed to strengthen the capacity of UK policing institutions in taking action against a number of strategic factors (money laundering, corruption, etc.) that weaken developing countries in the areas of good governance⁶ and sustainable development⁷ while also aggravating environmental damage and drivers of climate change (see below). The scale of the challenge is shown by the fact that of the 28 countries where DFID works directly, the median Corruption Perceptions Index of Transparency International in 2013 was 28 on a scale of 0 ('highly corrupt') to 100 ('very clean'), and none scored more highly than 53 or ranked higher than 49th out of 177 countries (Table 1, following page). Dealing with a group of countries with such pervasive levels of corruption, several of them with abundant natural resources (e.g. DRC, Burma, Nigeria), and practical links to London, the world's greatest financial centre with a persistently buoyant property market (i.e. with abundant scope for money laundering)⁸, poses numerous dangers that EIAAC will help to address.

A very substantial (albeit hard to quantify) source of funds that are likely to lead to corruption or to require laundering derive from various kinds of environmental crime, which include: (a) illegal trade in endangered species and wildlife products in contravention of the Convention on International Trade in Endangered Species (CITES); (b) illegal/undocumented trafficking in ozone depleting substances (ODS) in contravention of the Vienna Convention for the Protection of the Ozone Layer, and its Montreal Protocol⁹; (c) dumping and illicit trade in hazardous wastes in contravention of the Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Other Wastes and their Disposal; (d) illegal, unreported and unregulated fishing in contravention of controls imposed by various regional fisheries management organisations; (e) illegal logging and the associated trade in stolen timber in violation of national laws; (f) illegal transfer of genetically-modified organisms or potential alien invasive species in violation of the Convention on Biological Diversity and its

⁶ i.e. "stable, lawful and effective governance maintained by accountability to an informed electorate" (Caldecott, J., Hawkes, M., Bajracharya, B., & Lounela, A., 2012 *Evaluation of the Country Programme Between Finland and Nepal*. Evaluation Report 2012:2, Ministry for Foreign Affairs of Finland, Kopijyvä Oy, Jyväskylä, Finland).

⁷ Meeting the needs of current or local people in ways that preserve or enhance the ability of future or distant people to do the same (see: <http://www.iisd.org/sd/>). It has also been defined as 'living on the Earth as if we intended to stay here' (Sir Crispin Tickell, 1998).

⁸ The Swiss Federal Department of Foreign Affairs notes "Highly developed financial centres run the risk of being misused to launder money" (www.eda.admin.ch/eda/en/home/topics/finec/intcr/mlaun.html)

⁹ Other, unregulated ODS have also recently been detected - see 'Mysterious new man-made gases pose threat to ozone layer' (<http://www.bbc.co.uk/news/science-environment-26485048>, 9 March 2014).

Cartagena and Nagoya protocols; and (g) criminal activity surrounding financing for REDD+ programmes and other carbon conservation investments.

The EIAAC *Project Document* therefore observes that “Natural resources often provide fertile ground for corruption. The risk of corruption cuts across natural resource sectors – from non-renewable resources such as oil, gas, minerals and metals, to renewable resources such as forests, fisheries and land. The relationship between natural resources and corruption is twofold. Firstly, the existence of appropriable resource revenues can result in a high level of rent-seeking behaviour. Secondly, corruption may occur within natural resource management systems themselves, leading to sub-optimal use of these resources and to poor development outcomes in terms of growth and/or poverty reduction. Increasing research is also being undertaken internationally into the corruption risks in emerging frameworks for climate governance, including adaptation, mitigation, financing and trading schemes.”

| Countries where DFID works ¹⁰ | Corruption Perceptions Index 2013: score & rank ¹¹ |
|--|---|
| Afghanistan | 8 (rank 175=/177) |
| Bangladesh | 27 (rank 136/177) |
| Burma/Myanmar | 21 (rank 157/177) |
| Democratic Republic of Congo (DRC) | 22 (rank 154/177) |
| Ethiopia | 33 (rank 111=/177) |
| Ghana | 46 (rank 63/177) |
| India | 36 (rank 94/177) |
| Kenya | 27 (rank 136/177) |
| Kyrgyzstan | 24 (rank 150/177) |
| Liberia | 38 (rank 83/177) |
| Malawi | 37 (rank 91/177) |
| Mozambique | 30 (rank 119/177) |
| Nepal | 31 (rank 116/177) |
| Nigeria | 25 (rank 144/177) |
| Occupied Palestinian Territories (OPT) | Not available |
| Pakistan | 28 (rank 127/177) |
| Rwanda | 53 (rank 49/177) |
| Sierra Leone | 30 (rank 119/177) |
| Somalia | 8 (rank 175=/177) |
| South Africa | 42 (rank 72/177) |
| Sudan | 11 (rank 174/177) |
| South Sudan | 14 (rank 173/177) |
| Tajikistan | 22 (rank 154/177) |
| Tanzania | 33 (rank 111=/177) |
| Uganda | 26 (rank 140/177) |
| Yemen | 18 (rank 167/177) |
| Zambia | 38 (rank 83/177) |
| Zimbabwe | 21 (rank 157/177) |
| Mean score (excluding the OPT) | 27.7 |
| Median score (excluding the OPT) | 28 |

¹⁰ <https://www.gov.uk/government/organisations/department-for-international-development/about#where-we-work>. The 28 countries listed are those in which DFID works directly. There are also three regional programmes in Africa, Asia and the Caribbean, and development relationships with three aid-dependent Overseas Territories (St Helena, the Pitcairn Islands and Montserrat).

¹¹ <http://www.transparency.org/cpi2013/results/>. “The Corruption Perceptions Index 2013 serves as a reminder that the abuse of power, secret dealings and bribery continue to ravage societies around the world. The Index scores 177 countries and territories on a scale from 0 (highly corrupt) to 100 (very clean). No country has a perfect score, and two-thirds of countries score below 50. This indicates a serious, worldwide corruption problem.”



Table 1 Levels of corruption in countries where DFID works

Much of this work is being undertaken by Interpol¹² and the UN Interregional Crime and Justice Research Institute (UNICRI)¹³. The former has an Environmental Crime Programme with five long-term projects: (a) 'Leaf' (with UNEP), on illegal logging and other forest crime; (b) 'Predator', on illegal use of the Asian big cats; (c) 'Scale', on fisheries crime; (d) 'Wisdom', on elephant and rhinoceros crime and the illegal trade in ivory; and (e) 'Eden', on illegal trade in waste, with a focus on e-waste. It also participates with various countries to develop a network of environmental technical and forensic experts, to promote best practices in environmental forensics and to turn them into a manual for global distribution and training sessions.

UNICRI, meanwhile, "considers environmental crime, including its links with other forms of crime, a serious and growing danger for development, global stability and international security", and sees countering environmental crime as a major and increasing priority. Its main activities comprise: (a) convening international conferences and workshops on environmental crime; (b) collecting data and mapping illicit waste trafficking, analysing international legislation, and identifying risk factors linked to organised crime; (c) capacity building for law enforcement, and public outreach activities; and (d) maintaining an Environmental Crime Bibliography¹⁴.

In light of the above, a Climate and Environment Sensitivity Analysis was done for each feasible option to identify the expected impacts. The full analysis is presented in Annex 1 and is summarised below taking into account the effect of climate change and the environment on the proposed intervention, and conversely the effect of the intervention on climate change and the environment.

Negative Impacts.

We do not anticipate that the intervention will make any systematic contribution to climate change and environmental degradation, and direct negative impacts would be limited to resource use from incremental office-based activities, and GHG emissions from incremental travel in the course of policing activities.

Opportunities.

The draft Business Case observes that "Money laundering is a major vehicle for transmitting the proceeds of corruption out of a country. Funds may be corruptly obtained through a range of routes, many of which may pose a risk to the environment. For example, illegal logging, trade in banned chemicals and endangered species, and bypassing regulations that result in inadequate safeguards to the environment. By strengthening anti money laundering regimes, not only in such countries but also in major money-laundering centres to which corrupt funds may be sent, this programme should help reduce the opportunity for this type of corruption."

Since these beneficial effects cannot be quantified in advance nor linked through specific chains of causality to climate change and environmental protection, the programme is assessed as having no direct benefits for climate change/the environment. Indirect benefits,

¹² See, for example: (a) *Electronic Waste and Organised Crime: Assessing the Links* (Interpol Pollution Crime Working Group, 2009); (b) *Green Carbon, Black Trade: Illegal Logging, Tax Fraud and Laundering in the Worlds Tropical Forests* (UNEP & Interpol Environmental Crime Programme, 2012); (c) *Guide to Carbon Trading Crime* (Interpol Environmental Crime Programme, 2013); (d) *Interpol Fact Sheet: Environmental Crime* (COM/FS/2013-05/PST03); (e) www.interpol.int/Crime-areas/Environmental-crime/Resources (accessed 3 Mar 2014).

¹³ www.unicri.it/topics/environmental/ (accessed 3 Mar 2014).

¹⁴ www.unicri.it/in_focus/on/201419_new_online_bibliography (accessed 3 Mar 2014).

however, could well be significant, and would be enhanced further if awareness on environmental crime were to be raised within the EIAAC institutions. This could be done through specific training efforts by institutions with appropriate expertise, such as Interpol's Environmental Crime Programme, UNICRI, UNEP-WCMC, IIED, IUCN¹⁵, or else, with fewer cost implications, by accessing informally the accumulated knowledge, networks and experience of Interpol and UNICRI in particular, and the case studies, manuals, guidelines and bibliographies that they have already produced and which were mentioned above.

On the basis of this assessment, the final climate and environment categorisation is provided as follows:

Final Climate and Environment Categorisation

| Option | Climate change and environment risks | Climate change and environment opportunities/benefits |
|--------|--------------------------------------|---|
| 1 | C | C |
| 2 | C | B |

Definition of Categories:

| | |
|---|--|
| A | High potential risk/opportunity |
| B | Medium/manageable potential risk/opportunity |
| C | No/Low potential impact/opportunity |
| D | Core contribution to a multilateral organisation |

¹⁵ As has been done, for example, with HMRC in the case of compliance with the Convention on International Trade in Endangered Species (CITES) - see, for example, 'Customs Enforcement in Relation to CITES, Written Evidence Submitted by the Home Office, including the UK Border Fence', Ev 147-155 in: *Wildlife Crime: Third Report of Session 2012-13, Vol. 1: Report, Together with Formal Minutes, Oral and Written Evidence, Volume 1* (Great Britain: Parliament: House of Commons: Environmental Audit Committee; The Stationery Office, 18 Oct 2012, London).



SECTION 2

Management Case


What are the risks and how will these be managed?

The main impacts from the programme itself are limited and easily managed with appropriate management measures, notably:

- Resource use (e.g. paper, energy) primarily from office based activities; and
- GHG emissions from incremental transportation.

These risks will be mitigated by:

- **Implementation of environmental management measures.** Specific measures to minimise operational impacts on the environment and global climate should be identified by the EIAAC partner institutions to promote carbon and environmental savings (for example through green procurement, reducing the carbon footprint, minimising waste, and recycling). There are numerous models (e.g. www.cambs.police.uk/help/carbonmanagement/) and guidelines (e.g. www.oecd.org/industry/inv/corporateresponsibility/18269204.pdf) available to support such managerial strategies.
- **Considering GHG emission off-setting measures for incremental emissions associated with the policing operations.** A possible model for off-setting emissions is that used by the Swiss Federal Department of Foreign Affairs (DFA), in which emissions from in-service air travel are off-set under Swiss Agency for Development and Cooperation (SDC) project 7F-05823 by buying Certified Emission Reductions from energy efficiency and renewable energy projects in India. In this case, only projects certified under the Clean Development Mechanism Gold Standard were considered (see: www.cdmgoldstandard.org). This is a certification standard widely endorsed and used by major international NGOs, corporations, governments and UN agencies. Gold Standard projects must adhere to a stringent and transparent set of criteria developed by the Secretariat of the Gold Standard Foundation, overseen by an independent Technical Advisory Committee and verified by UN accredited independent auditors. The certification process uniquely requires the involvement of local stakeholders and NGOs. To be eligible for Gold Standard certification, projects must: (a) fall under the scope of renewable energy, energy efficiency, waste management and/or land use and forests; (b) adhere to the strictest standards on additionality; and (c) positively impact the economy, health, welfare and environment of the local community hosting the project. In the case of the DFA arrangement, it was calculated that five years' emissions required an investment of CHF 1.1 million to off-set, but it would be hard to use emissions from the operation of a global diplomatic network as a model for incremental air travel generated by policing operations. Unless the EIAAC participating institutions already have emission audits and off-setting arrangements, a baseline understanding of their emission profiles should be obtained, following which off-setting measures should be developed in dialogue with the Gold Standard Foundation.



What are the opportunities and how will these be exploited?

The nature of the opportunity that has been identified (i.e. “potential to positively impact on climate change and the environment” as a Rating B category in Table A4 of DFID’s *How to Note* on CEA (Feb 2014) is barely classifiable in terms of the checklist of risks and opportunities in Annex B of the same document, mainly because it is simply an enabling measure to enhance the ability of existing policing institutions to detect, investigate and deter financial flows linked to environmental crime. This would be expected to have leverage effects in developing countries that could be quite significant in climate and environment terms¹⁶, but which are inherently unpredictable in detail. No major additional investment would be required or is recommended, since the knowledge needed to raise awareness on environmental crime across the EIAAC participating institutions already exists and is already accessible. Specific measures proposed are therefore limited to the following: (a) official outreach (not necessarily at a senior level) to the Interpol Environmental Crime Programme, UNICRI, UNEP-WCMC, IIED, IUCN to establish what services and resources (e.g. participation in training workshops, visiting lecturers, digital help systems, fact sheets, handbooks and other publications) they can offer and at what cost; and (b) managers at each of the EIAAC institutions to cooperate in developing a cost-effective plan to use those services and resources from early in the programme. In logframe terms, it is assumed that the EIAAC institutions will accept the need for greater awareness of environmental crime among their staff, and will be willing (unless additional funds are available from DFID) to allocate a small share of their individual budgets to cooperative learning activities with the above-listed knowledge holders. It is also assumed that the knowledge holders will be willing to share information affordably with EIAAC, but since all of them exist specifically to act as knowledge resources for others, it would be surprising if not and the main unresolved question revolves around price.

¹⁶ To be explicit: it is relatively easy to imagine that the breaking up of an illegal logging or mining money-laundering ring could contribute to saving a national park somewhere.



Annex 1 Environmental and Climate Change Sensitivity Analysis

| | 1. DFID provides no increased funding to EIAAC | 2. DFID provides increased funding to EIAAC |
|---|--|---|
| Negative impacts - Is the proposed intervention likely to contribute to: | | |
| Climate change | No increase in GHG emissions. | Increased GHG emissions from travel and energy use by partner institutions (i.e. Proceeds of Corruption Unit of the Metropolitan Police Service, the Crown Prosecution Service Asset Recovery Unit, the Overseas Anti-Corruption Unit of the City of London Police, and the Intelligence Cell on International Corruption in the Serious Organised Crime Agency); off-setting options to be explored. |
| Environmental degradation | No increase in environmental degradation. | Increased demand for resources by partner institutions; measures to minimise operational impacts on the environment to be explored. |
| Vulnerability to environmental change | No change in vulnerability. | No change in vulnerability. |
| Risk rating | No risk | Low risk |
| Positive impacts - Could the proposed intervention help: | | |
| Tackle climate change | No direct benefits. | Expected indirect benefits would be enhanced by raising the awareness of officials in relation to crimes that contribute to climate change and environmental damage. |
| Improve environmental management | No direct benefits. | Expected indirect benefits would be enhanced by raising the awareness of officials in relation to crimes that contribute to climate change and environmental damage. |
| Reduce vulnerability to environmental change | No direct benefits. | Expected indirect benefits would be enhanced by raising the awareness of officials in relation to crimes that contribute to climate change and environmental damage. |
| Opportunity rating | No opportunity | Medium opportunity |

Table 2 Impacts of the Intervention on Climate Change and Environment



| | 1. DFID provides no increased funding to EIAAC | 2. DFID provides increased funding to EIAAC |
|--|--|---|
| Negative impacts - Are the objectives of the project likely to be at risk from: | | |
| Climate change | No risk. | No risk. |
| Environmental degradation | No risk. | No risk. |
| Risk rating | No risk | No risk |
| Positive impacts - Could the proposed intervention be enhanced by: | | |
| Tackling climate change | No opportunity. | No opportunity. |
| Better environmental management | No opportunity. | No opportunity. |
| Opportunity rating | No opportunity | No opportunity |

Table 3 Impacts of Climate Change and Environment on the Intervention

Definition of Categories:

| | |
|----------|--|
| A | High potential risk/opportunity |
| B | Medium/manageable potential risk/opportunity |
| C | No/Low potential impact/opportunity |
| D | Core contribution to a multilateral organisation |

Annex 2 Draft Climate and Environment Assurance Note

| Intervention details | | |
|---|-----------------|-------------------------------|
| Title | Home department | Budget |
| Tackling International Corruption in the UK through Anti-Money Laundering and Anti-Bribery Enforcement (aka Enhancing International Action against Corruption, EIAAC) | | £ 8.526 million to March 2016 |

| Responsible officers | | |
|----------------------|------|------------|
| Title | Name | Department |
| | | |
| | | |

| Appraisal | |
|--|--|
| Success criteria | Sensitivity analysis |
| (a) Sustained increase in the number of cases of money laundering by politically exposed persons investigated by the Proceeds of Corruption Unit and referred for further action. (b) Increased number of corruption/money laundering cases being appraised for asset recovery action. (c) Sustained increase in the number of cases of foreign bribery, by UK nationals and businesses operating in developing countries, investigated by the City of London Police. (d) Increased and enhanced intelligence feed on corruption relating to developing countries. | Climate and Environment Sensitivity Analysis carried out for both options. |
| Climate & Environment Category | |
| Risks & impacts C - low risks | Opportunities B - medium opportunities |

| Management | | |
|--|--|---|
| Risks & opportunities defined | Climate & Environment measures agreed | Climate & Environment measures in log-frame |
| Risks | | |
| Impacts of the intervention on climate change/the environment | | |
| Neither of the options proposed would generate any unmanageable risks. Impacts are limited to: | | |
| Resource use from incremental office activity (energy, water and paper use). | Office resource use conservation options to be explored. | No climate or environment actions were included in the log-frame. |
| GHG emissions from incremental travel. | Off-setting options to be explored. | |
| Impact of climate change/environmental degradation on the intervention | | |
| The programme objectives and outputs are assessed to be at low risk from climate change and environmental degradation. | | |
| | | No climate or environment actions were included in the log-frame. |
| Opportunities | | |



Impacts of the intervention on climate change/the environment

The proposed programme has no direct benefits. Indirect/potential benefits exist but to maximise these would require awareness raising on environmental crime among officials in EIAAC partner institutions.

| | | |
|--|--|--|
| | | No climate or environment actions were included in the log-frame. DFID may wish to consider adding to the log-frame indicators appropriate to the inclusion of environmental crime awareness-raising measures, and the assumption that EIAAC participants will accept such measures. |
|--|--|--|

Evidence

Relevant documents

Draft EIAAC Business Case, Programme Document including log-frame

SIGNED OFF BY

DATE