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**NOTE**

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From: Presidency  
To: Delegations

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Subject: Global assessment of the criminal threat in the context of the war in  
Ukraine

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*Courtesy translation*

Russia's invasion of Ukraine has resulted in significant population movements in a largely degraded security environment and requires increased attention from the European Union to a possible increase in the criminal threat. Since the beginning of the conflict, four million people have crossed the borders of Ukraine to seek refuge in an EU Member State and in Moldova. Secondary movements are observed, in particular due to the presence of strong Ukrainian diasporas and the solidarity expressed by the citizens of several European Member States.

First of all, the large population movements, mainly composed of women and minors, whether accompanied or not, raise fears of an increase in trafficking (sexual exploitation, labour exploitation), as already existing on Ukrainian territory in peacetime<sup>1</sup>. The International Organisation for Migration has expressed its concerns in this area, noting that the mobilisation of civil society, although commendable, could facilitate the recruitment of vulnerable people if it is used by organized crime networks<sup>2</sup>. Europol also alerted the security forces and public authorities to the risks in this area<sup>3</sup>.

Furthermore, among the risks envisaged is the infiltration of criminals into the European Union, including terrorists, who may use falsified identity documents. It is possible that criminal organisations may seek to take advantage of the circumstances to expand their illicit activities or pursue them outside their traditional area of operation. While the collection of information on the effectiveness of these risks requires continuous work, the services already note that the heads of criminal organisations could take advantage of the situation to enter the Schengen area. Moreover, the war is conducive to the circulation of weapons, some of which could enter the European Union to be used for criminal purposes. Similarly, trafficking in abandoned or stolen private vehicles and their spare parts belonging to displaced Ukrainians could flourish in the border countries. CBRN risks must also be taken into consideration.

Finally, the increase in hybrid threats, such as cyber-attacks on critical infrastructure or the dissemination of false information, should be taken seriously. Indeed, some Member States have reported an increase in the number of malicious attacks on digital infrastructure<sup>4</sup>. While it is not yet possible to establish a causal link between the war in Ukraine and these attacks, it is important to remain vigilant.

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1 *IOM Ukraine Strategic Approach 2020–2024*

2 *IOM Warns of Increased Risk of Trafficking in Persons for People Fleeing Ukraine*, March 16th, 2022

3 Europol Public Information, [\*Early Warning Notification, War in Ukraine – refugees arriving to the EU from Ukraine at risk of exploitation as part of THB\*](#), The Hague, March 2022 Ref. No.: 2022-340

4 Estonia, Latvia, Lithuania, Poland and Slovakia

In the longer term, the accelerating flow of drugs to the European Union and the risks to public health should also be taken into account. As Ukraine is a country with a high incidence of heroin use (the third most prevalent drug), a transit country for heroin from Afghanistan and for heroin substitutes<sup>5</sup>, with large seizures in recent years<sup>6</sup>, there is a risk that the flow of drugs to the EU will increase via Ukraine. Belarus, which has in the past threatened to suspend measures to combat drug trafficking to the EU, and Russia are also transit countries for Afghan drugs (heroin, opium and even methamphetamine) and for the production of synthetic drugs. In addition, the reconfiguration of the trafficking of tobacco products is also a source of concern. Belarus and Transnistria are historically important sources of smuggled, clandestinely produced or institutionally overproduced tobacco products. The disruption of Transnistria's border controls for other priorities on the one hand, and the search for income by members of the Belarusian leadership in response to European and international sanctions on the other, pose a risk of intensifying heavily organized smuggling. Ukraine is also a source of smuggled cigarettes and labour for international criminal organisations involved in smuggling.

In these circumstances, the EU's Justice and Home Affairs agencies, particularly Frontex and Europol, must play a major role in assessing and monitoring potential criminal threats with the neighbouring countries most affected by the conflict in Ukraine<sup>7</sup>. In order to do so, they will be able to benefit from the activation of the EMPACT community, but also to support the operational initiatives developed by the "Drivers" of the various operational action plans.

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5 [\*Report on the drug and alcoholic situation in Ukraine for 2020\*](#) (according to 2019 data), OEDT, *Stopping the trafficking of a heroin substitute in France, Poland and Ukraine, including the planning and execution of a controlled delivery*, 2021/00446, Eurojust, May 2020.

6 [\*9 arrested and \\$100 000 of heroin substitute pills seized with support of Europol and Eurojust\*](#), May 29<sup>th</sup>, 2019

7 [\*Europol continues to support EU Member States affected by the conflict in Ukraine\*](#), March 11<sup>th</sup>, 2022

Europol has deployed officers to Slovakia, Poland and Moldova to assess the situation regarding migrant smuggling, arms trafficking and to support second-line security checks. With Europol concerned about the number of undocumented entrants to the EU, it seems necessary to integrate the agency's reinforcements into Member States' second-level controls to prevent any risk of criminal infiltration. The feedback role of these agencies is essential to enable Member States to involve the EMPACT mechanism to anticipate and respond to threats arising from the Ukrainian crisis.

Regular monitoring of the situation by Europol should allow for a better assessment and anticipation of criminal risks related to the war in Ukraine.

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