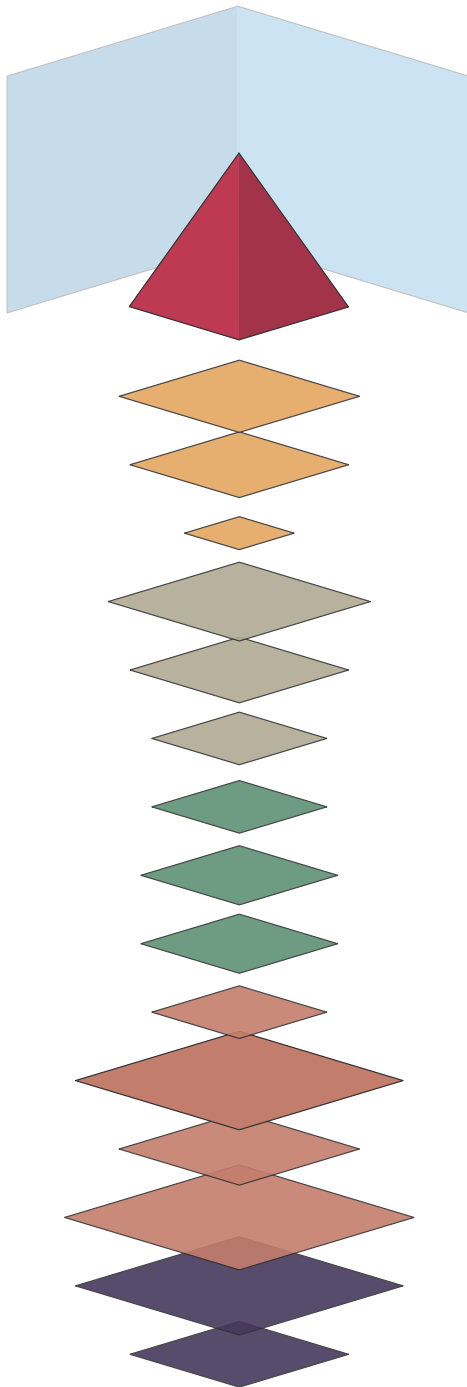


NETHERLANDS



4.97

CRIMINALITY SCORE

97th of 193 countries

20th of 44 European countries

5th of 11 Western European countries



CRIMINAL MARKETS

5.23

| | |
|-------------------------------------|------|
| HUMAN TRAFFICKING | 5.50 |
| HUMAN SMUGGLING | 5.00 |
| EXTORTION & PROTECTION RACKETEERING | 2.50 |
| ARMS TRAFFICKING | 6.00 |
| TRADE IN COUNTERFEIT GOODS | 5.00 |
| ILLICIT TRADE IN EXCISABLE GOODS | 4.00 |
| FLORA CRIMES | 4.00 |
| FAUNA CRIMES | 4.50 |
| NON-RENEWABLE RESOURCE CRIMES | 4.50 |
| HEROIN TRADE | 4.00 |
| COCAINE TRADE | 7.50 |
| CANNABIS TRADE | 5.50 |
| SYNTHETIC DRUG TRADE | 8.00 |
| CYBER-DEPENDENT CRIMES | 7.50 |
| FINANCIAL CRIMES | 5.00 |



CRIMINAL ACTORS

4.70

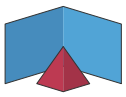
| | |
|-----------------------|------|
| MAFIA-STYLE GROUPS | 4.50 |
| CRIMINAL NETWORKS | 6.00 |
| STATE-EMBEDDED ACTORS | 3.00 |
| FOREIGN ACTORS | 6.00 |
| PRIVATE SECTOR ACTORS | 4.00 |



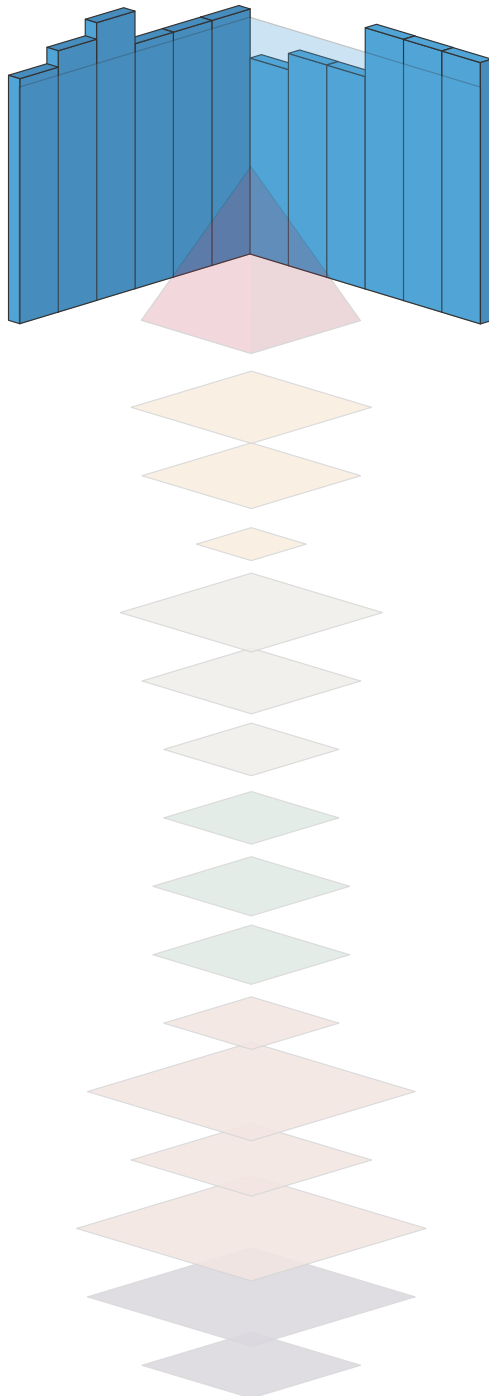
7.46

RESILIENCE SCORE





NETHERLANDS



7.46

RESILIENCE SCORE

17th of 193 countries

13th of 44 European countries

7th of 11 Western European countries

| | |
|--|------|
| POLITICAL LEADERSHIP AND GOVERNANCE | 7.50 |
| GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY | 8.00 |
| INTERNATIONAL COOPERATION | 8.50 |
| NATIONAL POLICIES AND LAWS | 7.50 |
| JUDICIAL SYSTEM AND DETENTION | 7.50 |
| LAW ENFORCEMENT | 7.50 |
| TERRITORIAL INTEGRITY | 6.00 |
| ANTI-MONEY LAUNDERING | 6.50 |
| ECONOMIC REGULATORY CAPACITY | 6.50 |
| VICTIM AND WITNESS SUPPORT | 8.00 |
| PREVENTION | 8.00 |
| NON-STATE ACTORS | 8.00 |



4.97

CRIMINALITY SCORE



CRIMINAL MARKETS 5.23



CRIMINAL ACTORS 4.70



CRIMINALITY

CRIMINAL MARKETS

PEOPLE

The Netherlands is a source, transit and destination country for human trafficking, with many victims coming from Hungary, Romania and Bulgaria. Various foreign actors, including Eastern European and Chinese triads, Albanian and Italian mafias, and Bulgarian gangs, are involved in this market. Victims are often trafficked for forced labour in the agriculture, forestry or catering industries, or for criminal gang activity. Sex trafficking is a significant issue in the prostitution market. Online contact plays a significant role in human trafficking cases. Perpetrators mostly utilize methods such as debt bondage, violent threats and blackmail to exploit their victims.

Besides its role as a destination country, the Netherlands may be increasingly used as a transit country for the human smuggling market, with Dutch citizens being involved in smuggling people from continental Europe to the UK. There has been an increase in the number of asylum seekers in the country in recent years and it is estimated that more than half of all asylum seekers in the Netherlands have been assisted by someone in return for payment, with victims from Eastern Europe, Western Africa, Syria and Iran being the most common. While there have been reports of violence associated with human smuggling, it is not common. Dutch and other EU nationals are suspected of being involved in human smuggling, with foreign nationals mainly working as drivers or members of mobile organized crime groups.

Extortion and protection racketeering among drug dealers takes place in the Netherlands. Criminals have also extorted import companies whose shipments were contaminated with drugs. However, extortion and protection racketeering are not common, although these activities are underreported.

TRADE

The Netherlands plays a significant role in the illegal arms trade, serving as a transit country for firearms from Belgium, Germany and Eastern Europe, and as a source country for firearms heading to the UK. Firearms are popular among drug traffickers, and many brokers are part of larger criminal networks. The demand for firearms has increased as conflicts in drug trafficking have escalated, leading to more circulation of heavy arms and a decrease in firearms prices. Data on illicit arms seizures in 2021 and 2022 show that the Czech Republic, and to a lesser extent Croatia, are main source countries for arms trafficking in the Netherlands.

The Netherlands is also a crucial transit and destination country for counterfeit goods, with the port of Rotterdam serving as the primary entry point for these products into mainland Europe. Counterfeit goods such as fake cosmetics, food, pharmaceutical products, pesticides and toys, have seen a surge in demand in recent years. They are often distributed through social media platforms and messaging services. The illicit trade of excise goods in the Netherlands includes tobacco, and alcohol. Ship chandler companies are often involved in the trade of excise goods, as excise duties do not apply at sea, allowing for large quantities of goods to be illicitly sold in the country. The demand for these goods appears to be local, as most of them were found to be sold within the country. Countries such as Belgium, France and Slovenia also have links to the illicit trade in the country's excise goods, specifically illegal cigarettes. In this respect, the illicit trade in excise goods has increased in the Netherlands as well as in neighbouring countries. The Dutch government has taken action against clandestine cigarette factories in recent years, which cost the state millions of dollars annually in excise duties.

ENVIRONMENT

The Netherlands plays a significant role in the illegal trade of endangered plant species originating from Asia, Africa and Latin America, serving as a transit and destination country. Orchids, cacti and traditional Chinese medicinal plants are among the most commonly smuggled flora. The country also imports a significant number of wood-based products, mainly from China. Despite having strict controls, the importation of illegally logged timber is still a problem due to a lack of due diligence in source countries.

The Netherlands is also a key transit and destination country for the illegal wildlife trade, particularly for live reptiles and birds from Latin America, Africa and Asia. Its geographic location, national infrastructure and historical trading position make it a hub for this illicit activity. Some Dutch citizens have been identified as key actors in the trade, which often involves fraud, tax evasion and money laundering. Major wildlife fairs and markets in the Netherlands also facilitate illegal wildlife trade for entrepreneurs across Europe. While most trading is legal, illegal trade takes place at the fringes of these gatherings. The market for fauna crimes in the Netherlands appears to be increasing, with exotic animals remaining popular pets and large sums of money spent on obtaining unique animals.

The Netherlands is also a stable destination and transit zone for illicit markets dealing with non-renewable resources such as gold, diamonds and minerals. The Dutch Caribbean islands of Aruba and Curaçao are essential in transporting gold from Latin American countries known for illegal gold

exploitation to the Netherlands, where it is laundered or concealed. Criminal groups in these countries have links to militias, corruption and violence, and illegal mining is connected to other crimes such as drug and human trafficking. Once in the Dutch Caribbean, origin papers are falsified to conceal the gold's illegal source. Dutch oil companies are also linked to corruption and illegal activities in source countries in Africa and Latin America.

DRUGS

The heroin trade in the Netherlands has remained stable for years, and the country is both a transit and destination point for the drug. Heroin typically originates from Afghanistan, and passes through Turkey and the Balkans. The trade is controlled by Turkish and Kurdish criminal groups, with some indications of Moroccan mafia involvement. The heroin market contributes to local gang violence, particularly in the Randstad zone, but there is no evidence of an increase in heroin usage in the Netherlands in recent years.

The Netherlands is a significant hub for the cocaine trade in Europe, with Rotterdam Port serving as the main hub for trafficking. Large amounts of cocaine are regularly seized in the port, with Dutch police estimating that a significant share of the cocaine entering Europe passes through Rotterdam, making the country a transit hub for the drug. The Netherlands is also a destination country for cocaine. The cocaine trade in the Netherlands is primarily driven by imports from South America, with Brazil, Ecuador, Peru and Venezuela being major sources. The increased cocaine trade in the Netherlands has led to a momentary rise in violence in the country.

Cannabis is the most commonly used illicit substance among the adult Dutch population, and the Netherlands is known for its domestic production and export of the drug. Although consumption and sales are tolerated, the cannabis sold in Dutch establishments is supplied illegally. Despite the tolerant stance towards cannabis, the market remains relatively modest and primarily targets tourists. Morocco is a key origin country for most of the hashish sold in the Netherlands, and there are indications that Albanian cannabis with low THC levels is being imported and blended with high-THC cannabis. Not all organizations involved in the cannabis trade are also involved in the cocaine or heroin trade.

The Netherlands is a major producer, exporter and consumer of synthetic drugs, particularly amphetamines and ecstasy (MDMA). Despite the pandemic-era closure of clubs, bars and festivals, ecstasy use in the country rose. Synthetic drug production is primarily located in North Brabant and Limburg, with outlaw motorcycle gangs increasingly involved in production and trade. Criminal organizations are both formally and informally linked, and corrupt civil servants have facilitated the market. Synthetic drugs from the Netherlands are exported worldwide, with China

providing a significant portion of the laboratory equipment, raw materials and chemicals necessary for their production.

CYBER-DEPENDENT CRIMES

The Netherlands has emerged as one of the leading countries for cybercrime, which increased during the pandemic. In fact, the hacking of bank accounts and cyberattacks on businesses and institutions have surged dramatically in recent years. Two trends have been observed in the country: transnational organized criminal actors deploying hacking tactics that rely on ransomware, and foreign actors using Dutch hosting companies to access the country's exceptionally fast and affordable network. Consequently, the country is likely to become a hub for cyber-dependent crimes, providing much of the transnational organized crime infrastructure necessary for these activities. In addition, fraudulent activities committed through the use of cryptocurrencies have been increasingly observed in recent years, with perpetrators exploiting the country's relatively lax legislation in this area.

Despite the country's advanced IT infrastructure, digital resilience still needs improvement; the chief risks include espionage, ransomware, digital space violations and large-scale outages. Furthermore, the higher education sector is a particular target for cyber ransom attacks, and its lack of preparedness has drawn attention.

FINANCIAL CRIMES

Financial crime, especially systematic fraud, has increased in recent years, especially during the COVID-19 pandemic, and is a major concern in the Netherlands. Dutch authorities have been cracking down on transnational organized crime networks involved in VAT fraud schemes that have defrauded the Dutch treasury of millions of dollars. Financial crime actors in the Netherlands also cooperate with German and South American criminal actors via the Dutch Caribbean, although information on transnational networks is limited. Despite steps taken to address financial crime, such as implementing stricter laws and increasing international cooperation, concerns persist about the country's vulnerability, particularly given its status as a global financial centre.

CRIMINAL ACTORS

Foreign actors, including Italian, East and Central European, Latin American, Vietnamese, Chinese, Russian, Ukrainian, Turkish, Kurdish, Moroccan and German-Turkish groups have been increasingly active in the Netherlands' criminal markets. Reports indicate that these groups have interconnected relationships, with Dutch-Caribbean groups having strong ties to local actors, Moroccan groups relying on ethnic cohesion, and Albanian and Italian mafia competing and cooperating with Dutch outlaw motorcycle and street

gangs. There are also reports of Dutch and Polish criminal actors collaborating on synthetic drugs, and Chinese triad groups specializing in human smuggling and other illicit markets such as arms and drug trafficking. Albanian groups are the predominant drug gangs in the Netherlands, with a reputation for being relatively closed-off and violent. Smaller criminal networks in the Netherlands primarily engage in street-level drug sales, prostitution and arms trafficking, with a concentration in Amsterdam, Rotterdam and The Hague. Synthetic drug production laboratories are scattered throughout the country, particularly in the eastern and southern provinces, leading to more loose associations in the synthetic drug trade. Additionally, local gangs involved in petty crime such as robberies and vehicle theft operate in the country.

The Netherlands is also home to various criminal groups that could be classified as mafia-like organizations, including outlaw motorcycle gangs. These groups frequently participate in criminal activities such as drug trafficking and extortion. Despite recent reports suggesting that the membership of these groups has not increased, they still pose a problem and contribute to local violence.

In terms of private-sector actors, there is a considerable number involved in money laundering in the Netherlands, with property development being the most prominent sector. There is a new trend of blending the criminal and non-criminal worlds, with professionals such as accountants, notaries, tax advisers and estate agents playing critical roles in facilitating money laundering by not reporting unusual transactions. Several Dutch banks have also been accused of money-laundering schemes in recent years, and ship chandlers are frequently involved in the illicit trade of excise goods, selling alcohol and tobacco on the Dutch market while reporting delivery to ships exempt from excise duties.

While there is only a moderate level of facilitation of crime by state-embedded actors, low-level participants such as street police who are partially controlled by criminals can leak information and engage in corruption that is vital for the continuation of criminal enterprises. There is also evidence of corruption within the building industry at the municipal level.

RESILIENCE

LEADERSHIP AND GOVERNANCE

The Netherlands has faced criticism from the international community due to its issues with drug trafficking. However, the country has not fallen under the control of organized crime and no aspects of state service delivery are provided by criminal groups. The country also has effective mechanisms in place to investigate and punish police abuse and corruption. While corruption is not seen as a significant problem, scandals involving top public-sector executives have emerged, and a growing number of police and customs officials have been prosecuted for aiding drug smugglers, which resulted in a worsening perception of government transparency.

The Netherlands is regarded as a positive example of a country willing to cooperate internationally in the fight against organized crime. The government supports EUROPOL and Eurojust and has signed various UN conventions and ratified protocols related to transnational organized crime, corruption and endangered species. In recent years, law enforcement successes have demonstrated the government's strong stance against organized crime, including international police operations leading to arrests, production site closures and seizures of illicit funds. However, there have been criticisms of the country's handling of arms trafficking from other countries. The Netherlands has a robust legal framework for tackling organized crime activities, including human trafficking,

drug trafficking, arms trafficking, wildlife crime and money laundering. The Dutch penal code criminalizes participation in criminal organizations and membership in terrorist organizations. The effectiveness of national legislation against organized crime activities in the Netherlands is considered adequate. Dutch laws and policies continue to evolve, and the country remains committed to improving cooperation and collaboration internationally in tackling transnational organized crime.

CRIMINAL JUSTICE AND SECURITY

The Netherlands boasts a robust judicial system that includes two units dedicated to tackling different aspects of transnational organized crime. Recently, funding to strengthen 'special intervention teams' and the protection of professional groups involved in fighting organized crime was increased. Although not yet complete, the government continues its efforts to digitize the Dutch judicial system, with the aim of increasing the effectiveness of the judiciary. Over the last decade, the Dutch judiciary has had multiple successes prosecuting organized crime, but concerns remain following the 2019 assassination of a Dutch lawyer working on a drug trafficking-related case. While the Dutch prison system is generally viewed as less susceptible to criminal infiltration than those of neighbouring countries, concerns have arisen following the closure of prisons in the past

decade due to decreasing crime rates. These closures may lead to more concentrated inmate populations and easier targeting by organized crime. Corruption cases and staffing shortages may also create deficits that the Netherlands must address in the future.

The Dutch police force has a national unit responsible for domestic policing, counterterrorism and combating organized crime. However, there is an ongoing debate about the quality and effectiveness of the police's investigative efforts, with claims of understaffing and underfunding. Dutch law enforcement has been accused of taking a 'naïve' stance against transnational organized crime, and there is a perception that the police force is unable to combat the emergence of a parallel criminal economy. Despite this, Dutch law enforcement agencies have been successful in making arrests. Recent cases of officers selling information to criminal actors may harm the high level of citizen trust that law enforcement enjoys.

The Netherlands is a key location for trafficking, particularly of drugs, firearms and humans due to its location and major ports. Membership in the Schengen area prohibits permanent border controls, making it challenging to monitor and track illicit flows of goods and people once they enter the country. To combat illicit activity, particularly drug trafficking via the ports of Antwerp and Rotterdam, the Netherlands places special emphasis on air and seaport controls. The country's exceptional digitalization makes it vulnerable to cyber threats, and it is likely a centre for cyber-dependent crimes.

ECONOMIC AND FINANCIAL ENVIRONMENT

Money laundering remains a serious issue in the Netherlands, which is one of Europe's hubs for financial crime. Despite its strong institutions, recent events have brought the issue back to the public agenda. The Dutch government has not made its position on the issue clear, but it has contributed to response efforts at the EU level. While the Dutch Financial Intelligence Unit manages financial activities every year, it has not fully lived up to its monitoring mandate. De-risking, a transaction-facilitation strategy currently pursued by several banks, may also be seen as an indicator of ineffective money laundering and terrorism financing mechanisms. This is likely to influence legislative debates and changes in the near- and medium-term future.

Since the 1990s, the Netherlands has focused on reducing administrative burdens for businesses. The government is collaborating with the business sector to prevent criminal actors from exploiting legitimate businesses for illicit purposes. Vulnerable sectors include finance, administration,

law, real estate and foodservices. The country is also flagged as a tax haven, with transnational criminal actors targeting and exploiting its Caribbean territories. An action plan for safe entrepreneurship is currently being renewed with plans for extension. In general, it is easy to do business in the country.

CIVIL SOCIETY AND SOCIAL PROTECTION

The Netherlands provides a government-funded victim support system through NGOs, which includes shelters for human trafficking and domestic violence victims and coordinators to assist human trafficking victims in each of the health care regions. The government allows presumed victims to stay for a three-month reflection period, during which they can decide whether or not to assist law enforcement. After the reflection period, victims who agree to assist law enforcement can continue to stay in shelters. Those willing to testify against their alleged trafficker are eligible to receive a temporary residence permit. However, critics argue that making residency status contingent on prosecution and conviction can be detrimental to the victim. Despite the government's funding for NGO initiatives, concerns persist over the mild punishment of convicted perpetrators, especially in the context of sexual violence.

The Netherlands does not have a national prevention strategy against transnational organized crime but instead focuses on national coordination through various branches of government. The police uses tactics such as monitoring trafficking flows, involving public and private actors to set up barriers against organized crime, removing excuses and deconstructing smokescreens used by financial facilitators, and improving social conditions to prevent involvement in organized crime. The government has maintained efforts to prevent human trafficking through awareness campaigns, inspections, training for personnel and assistance to foreign governments. The Dutch youth welfare services may play a crucial role in combating trafficking of minors.

The recent killing of a Dutch investigative journalist has highlighted the dangers journalists face when reporting on organized crime. In fact, more than half of all journalists have faced judicial, physical or cyber-threats during their career. Despite the important role of civil society organizations and NGOs, some populist parties in the Netherlands have questioned the legitimacy of traditional media.

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