



# Drug-related corruption at Schiphol Airport and the Port of Rotterdam

An analysis of corruption threats,  
impact and policy instruments based  
on the methodology for National Risk  
Assessment

## Summary

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## Summary

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In 2022, the Research and Data Centre (Wetenschappelijk Onderzoek- en Datacentrum or WODC), at the request of the Dutch Ministry of Justice and Security, commissioned RAND Europe to conduct a study on drug-related corruption threats at Schiphol Airport and the Port of Rotterdam.

Awareness of the risk of corruption at the port of Rotterdam and at Schiphol Airport has increased in recent years, particularly due to reports of corruption cases at these main ports. While consciousness of this problem has resulted in increased investment in tackling corruption, it remains a highly complex problem that is difficult to map and requires a holistic approach to fully grasp. Given the recent focus on corruption in the ports of Rotterdam and Schiphol, and the concern that there is no overall picture of corruption risks and available policy tools to counter this threat, the House of Representatives requested the government to set up a new and independent scientific study into the possible vulnerabilities in the integrity policies of organisations involved in supervision, enforcement, detection and regulation/licensing (the so-called ‘THOR organisations’) in the two main ports.<sup>1</sup>

Due to the limited success of past studies that sought to analyse case files and interviews to gain insights into the vulnerabilities of THOR organisations regarding influence attempts by organised crime groups, a research design grounded in expert judgment was deemed a more promising approach. Consequently, the decision was made to adopt the National Risk Assessment (NRA) methodology for this study. This method involves following a structured process with a group of experts with the aim of understanding vulnerabilities and threats without focusing on individual cases.

One of the main objectives of this study is therefore to test whether the methodology can meaningfully contribute to identifying potential corruption threats at the Netherlands’ largest main ports. Additionally, the study aims to accomplish the following objectives: a) contextualise potential characteristics of the main ports that may make them vulnerable to corruption; b) identify the greatest risks for each port; c) assess the potential impact of these risks and develop policies to prevent and suppress corruption; and d) identify potential risks that may become reality in the future and explore policy tools to mitigate these future risks.

This research has focused exclusively on corruption in the context of drug-related crime. We have defined corruption as ‘the abuse of [...]conferred powers for personal gain’.

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<sup>1</sup> Kamerstukken II 2020/21, 31 934, no 41.

## Research design

As mentioned above, the approach for this study is based on National Risk Assessments (NRAs), a research method that has previously been applied to money laundering and terrorist financing. The methodology relies heavily on insights from experts in the field combined with the analysis of additional secondary data sources. It includes four phases: desk research, interviews with experts, an online survey and a series of expert meetings.

In the first phase, the research team reviewed the available academic and grey literature for the purpose of context analysis and drawing up an initial longlist of corruption threats. In addition, several experts on corruption within the main ports were interviewed to gather insights that have not (yet) appeared in available publications.

The longlists of corruption threats were then presented to experts in an online survey to provide insights into the (un)awareness among participants of these corruption threats and to expand the list with threats that were still missing. Participants were subsequently invited to three expert meetings for each main port to rank, assess and discuss the corruption threats with the aim of prioritising threats based on their plausibility, prevalence and impact potential. They were tasked with estimating the potential impact of these threats using various criteria. Furthermore, in consultation with the study team, the participants compiled and assessed available policy tools designed to prevent and combat corruption within the main ports. This assessment focused on the resilience these tools offer against different corruption threats.

## What makes Dutch main ports vulnerable to corruption?

The study has produced an overview of the main contextual factors of the Port of Rotterdam and Schiphol Airport that make these main ports vulnerable to corruption.

### *An extensive flow of goods with particularly vulnerable sectors*

Several organisational factors may increase the Port of Rotterdam and Schiphol Airport's vulnerability to corruption. Existing research emphasised that the highly developed security of the main ports increases the likelihood of systematic infiltration attempts in the legal economy by organised crime groups. Furthermore, studies indicate that the increasing automation of logistics processes enhances the likelihood of organised crime groups attempting to breach information systems involved in the handling of goods.

In the case of Schiphol, security is mainly focused on people and goods entering the airport. Conversely, checks on goods and people leaving Schiphol's premises are less extensive. Furthermore, inspection appears to be logistically complex for some cargo flows due to the nature of the products shipped. This is certainly the case for fruit, flowers or fish/meat, as these need to be handled as efficiently and quickly as possible due to their limited shelf life. Moreover, the flow of goods through Schiphol Airport is substantial, making it impossible to subject all shipments to a physical check. Therefore, customs operate on the basis of risk-based surveillance, according to which consignments that pose a risk based on available information are prioritised.

Checking shipments is also complicated at the Port of Rotterdam for the same reasons. Due to the size of the cargo throughput, it is impossible for the competent authorities to check all incoming goods and

therefore use various methods to identify high-risk cargoes. Although this identification and control process is highly automated, several measures have been taken to reduce its vulnerability.

### *Large-scale sites with excellent logistics and digital infrastructure*

Due to high-quality physical, digital and knowledge infrastructure in the Netherlands, the Dutch main ports are important hubs in the global economy and function as a gateway to the European market. Schiphol Airport is one of Europe's largest airports while the Port of Rotterdam is Europe's largest container and bulk port. However, their sophisticated facilities make these main ports attractive targets for organised crime groups looking to traffic illicit substances and goods such as drugs, thereby increasing corruption risks. While it is the case that some these illicit goods are intended for the domestic Dutch market, most drugs appear to be smuggled into the European hinterland via road, water, or rail links, which is relatively easy due to the Schengen Agreement and European Customs legislation.

The economic importance of these main ports has led to the establishment of numerous businesses in and around the sites of Schiphol and Port of Rotterdam. In the past, it was sometimes unclear exactly how many companies had established themselves at Schiphol and how reliable these companies were. Currently, several initiatives are underway to gain better insight into this matter. As for the Port of Rotterdam, the vast size of the port area poses a challenge for authorities seeking to secure the area fully. In addition, the presence of many private companies, as well as the port's proximity to the city of Rotterdam and excellent logistical connections with the European hinterland, also increases the port's vulnerability to criminal activity.

### *Workplace conditions make main ports particularly vulnerable to corruption*

Furthermore, the Port of Rotterdam and Schiphol are also distinguished by some socio-cultural characteristics that may make the main ports particularly vulnerable to corruption. These include workplace culture, such as the degree of trust in management, the degree of social control and workload, as well as employees' social capital, and the degree of autonomy and mobility experienced by employees.

At Schiphol Airport, the combination of tough working conditions and a shared socio-cultural background of employees appears to be a major risk factor. Research showed that this can at times create a culture that is difficult to penetrate and where willingness to report irregularities or offences is low. Furthermore, the use of temporary workers can also increase vulnerabilities, given that they are likely to feel less connected to the company and therefore more susceptible to criminal infiltration.

In the port of Rotterdam, there is evidence that the automation of port work has affected the traditionally robust social controls that may act as a barrier to integrity violations. Research shows that this social control has mostly disappeared in the large, crowded and often chaotic areas of the port. On the other hand, social pressure in the workplace may actually increase the risk of corruption by creating reluctance to act as a whistleblower because of fear of social repercussions. Lastly, human resources policies can influence the vulnerability of certain professions to corruption. For instance, the distance between management and executive staff experienced by workers at the port may contribute to general job dissatisfaction.

## *Drug-related corruption in the main ports cannot be separated from the dynamics of international drug trafficking*

It is important to mention that the issue of drug-related corruption in the main ports should not be separated from the dynamics of international drug markets and the Dutch business climate for organised crime. Although criminals are active in the Netherlands partly because of the country's excellent facilities and logistics infrastructure, they are not necessarily tied to specific main ports. Therefore, so-called displacement effects or 'waterbed' effects may be observed when barriers are erected against illegal activities in one main port, causing criminal groups to move to locations with fewer security measures. An example of this are indications that tighter controls in Rotterdam are causing drug traffickers to move from Rotterdam to other ports in the Netherlands or abroad.

## Findings for Schiphol Airport

### The corruption threats with the greatest potential impact according to experts

Based on desk research and interviews, five corrupting mechanisms were identified: 1) corruption through bribery; 2) corruption through blackmail; 3) corruption through violence; 4) corruption through social and/or romantic relationships; and 5) corruption through subculture pressure. These mechanisms were then tied to different main port sectors or links in the logistics chain. We have taken the term 'main port sector' to mean a geographical area or a link in the logistics chain where activities take place that contribute to the economic function of the main port, such as the law enforcement chain or the private security sector.

By linking the modi operandi and the main port sectors, an initial list of corruption threats could be constructed. The threats on this longlist were then discussed and prioritised by experts during the held expert meetings, after which we estimated the potential impact of the largest threats using seven weighted impact criteria.<sup>2</sup> For example, drug-related corruption can affect security on airports, the productivity of airports or the international reputation of the Netherlands. This led to a ranking of threats with the greatest potential impact. With the exception of bribery in the law enforcement chain, which is estimated to have the greatest impact, there is relatively little distinction between the impact scores of the other corruption threats.

**Table 0-1: Potential impact scores of the largest corruption threats at Schiphol**

Threat	Potential impact score (1 - 4)
1. <b>Law enforcement chain – corruption by bribery.</b> Employees of public agencies responsible for supervision, investigation and enforcement at Schiphol who can provide knowledge of vulnerabilities in or other sensitive information about the law enforcement chain.	3,3
2. <b>First-line cargo flow (fast goods such as fruit and flowers) – corruption of persons involved in the assembly and disassembly of air cargo in first-line warehouses,</b> after which the goods enter the aircraft or are transported to second-line warehouses.	3,0

<sup>2</sup> The seven impact criteria selected were: reduction in objective security; reduction in subjective security; undermining authority and the rule of law; direct damage to regular economy; damage to (inter)national reputation of the Netherlands and main port; disruption of social order; and reduced main port productivity.

Threat	Potential impact score (1 - 4)
3. <b>Planners in key positions with planning authority.</b> Employees in key positions who can provide information on vulnerable points in the logistics process chain and influence them.	3,0
4. <b>Workers in vulnerable positions in the baggage handling department – corruption through pressure in the workplace.</b> Persons working in baggage handling who look away due to peer pressure and therefore fail to fulfil their reporting duties.	3,0
5. <b>Corruption through bribery of a ‘broker’<sup>3</sup>.</b> A broker who can influence those in charge in logistics chain.	2,9
6. <b>Employees in other vulnerable positions who have access to aircraft – corruption by bribery.</b> Employees in vulnerable positions who can access aircrafts and may be susceptible to bribery, such as certain persons in the catering industry, cleaning industry and persons performing technical maintenance.	2,9
7. <b>Other first-line cargo flow – corruption of persons involved in the assembly and disassembly of air cargo in the first-line warehouses,</b> after which the goods enter the aircraft or are transported to the second-line warehouses.	2.9

## The resilience of available policy instruments

Experts were asked to estimate the airport's ability to anticipate, prevent, counter, mitigate and/or recover from corruption threats using the combined set of available policy tools and measures. For each of the major threats, participants quantitatively estimated the extent to which existing policy tools counteract the potential impact of the threat. Experts based their estimates on the policy instruments that were already (partly) in place at the time of the meeting.

Although estimates of the resilience vary slightly, the table below shows that experts considered Schiphol's resilience greatest against the threat that falls within the sphere of influence of the main port authorities involved and THOR organisations: ‘law enforcement chain – corruption by bribery’. Conversely, experts perceived Schiphol Airport to be particularly vulnerable to corruption from planners in key positions and brokers who can influence individuals working in the logistics chain.

**Table 0-2: Resilience scores for the total package of measures at Schiphol against the largest threats**

Threat	Resilience score (1 - 100)
1. <b>Law enforcement chain - corruption by bribery.</b> Employees of public agencies responsible for supervision, investigation and enforcement at Schiphol who can provide knowledge of vulnerabilities in or other sensitive information about the law enforcement chain.	67,9
2. <b>First-line cargo flow (fast goods such as fruit and flowers) – corruption of persons involved in the assembly and disassembly of air cargo in first-line warehouses,</b> after which the goods enter the aircraft or are transported to second-line warehouses.	65,9

<sup>3</sup> Brokers are individuals who leverage their networks to place certain people in key positions in the supply chain.

Threat	Resilience score (1 - 100)
3. <b>Planners in key positions with planning authority.</b> Employees in key positions who can provide information on vulnerable points in the logistics process chain and influence them.	59,9
4. <b>Workers in vulnerable positions in the baggage handling department – corruption through sub-culture pressure.</b> Persons working in baggage handling who look away due to peer pressure and therefore fail to fulfil their reporting duties.	65,7
5. <b>Corruption through bribery of a ‘broker’.</b> Broker able to influence those in charge in logistics chain.	51,1
6. <b>Employees in other vulnerable positions who have access to aircraft – corruption as a result of bribery.</b> Employees in vulnerable positions who can access aircrafts and may be susceptible to bribery, such as certain persons in the catering industry, the cleaning industry and persons performing technical maintenance.	66,0
7. <b>Other first-line cargo flow – corruption of persons involved in the assembly and disassembly of air cargo in the first-line warehouses,</b> after which the goods enter the aircraft or are transported to the second-line warehouses.	63,8

For both main ports, experts rated threats that include corruption through bribery as the modus operandi as particularly important. This indicates the perceived relative importance of financial incentives in corrupting employees in the logistics chain and support services for international drug trafficking through main ports, which may provide important leads for policy instruments. Corruption through non-reporting or even facilitating corruptive behaviour was also selected as a key threat for both main ports.

## Findings for the Port of Rotterdam

### The corruption threats with the largest potential impact according to experts

With regard to the Port of Rotterdam, this study used the same five modi operandi as were used for Schiphol and linked them to different main port sectors to arrive at an initial list of corruption threats. The threats on this list were subsequently discussed and prioritised by the participating experts, after which the potential impact of the largest threats was estimated using seven weighted impact criteria. As was the case for Schiphol, the experts considered that the impact of corruption through bribery in the law enforcement chain was the greatest. However, as opposed to the Schiphol case, the spread of potential impact scores was significantly higher.

**Table 0-3: Potential impact scores of the largest corruption threats in the port of Rotterdam**

Threat	Potential impact score (1 - 4)
1. <b>Law enforcement chain – bribery.</b> Corruption through bribery of employees of the public agencies responsible for supervision, detection and enforcement in the port, such as Customs, KMar, the HARC team, the National Police and the Seaport Police.	3,3

Threat	Potential impact score (1 - 4)
2. <b>Logistics chain and maritime transport – bribery.</b> Corruption through bribery of employees who facilitate in the modi operandi e.g., employees of shipping companies involved in the transport of goods by sea, such as shipowners and crews of container ships.	2,8
3. <b>Private guards and security chain – bribery.</b> Corruption through bribery of persons working for private security and surveillance companies at the port, such as security managers and employees of companies offering cargo checks.	2,7
4. <b>Ship's agent<sup>4</sup> – bribery.</b> Corruption through bribery of the ship's agent who have or provide authorised access to the port (e.g. to those involved in support activities, crew etc.).	2,7
5. <b>Logistics chain terminals – corruption through pressure in the workplace.</b> Corruption through pressures in the workplace that encourage individuals to look away and fail to fulfil their reporting duties.	2,7
6. <b>Maritime services – Financial bribery.</b> Corruption through financial bribery of persons involved in support activities at the port who have or grant authorised access to the premises, e.g. employees of cleaning services, the ship's agent, suppliers and persons performing ship and container repairs.	2,6
7. <b>High authorisation.</b> Individuals with access to sensitive data and the ability to erase digital traces.	2,6
8. <b>Hinterland transport – Blackmail.</b> Corruption by blackmail of persons involved in transport connections of released goods with the hinterland from and to the port, such as drivers (e.g. truckdrivers) including self-employed persons and employees of inland shipping companies, freight forwarders and other transport companies.	2,6
9. <b>Hinterland transport – Financial bribery.</b> Corruption through financial bribery of persons involved in transport connections of released goods with the hinterland from and to the port, such as drivers (e.g. truckdrivers) including self-employed persons and employees of inland shipping companies, freight forwarders and other transport companies.	2,3

## The resilience of available policy instruments

As was the case for Schiphol, the experts for the Port of Rotterdam subsequently focused on the port's ability to anticipate, prevent, counter, mitigate and/or recover from corruption threats using the combined set of available policy instruments and measures. For each of the largest threats, participants in the expert meetings then made a quantitative assessment of the extent to which existing policy instruments counteract the potential impact of the threat.

As the table below shows, experts considered the Port of Rotterdam's to be the most resilient against the threat 'high authorisation' and, as in the case of Schiphol, the threat that falls within the sphere of influence of the public agencies involved: 'Law enforcement chain – corruption through bribery'. By contrast, experts

<sup>4</sup> The ship's agent serves as the representative of a shipping company in a foreign port and aids the vessel's master in navigating customs clearance. They manage all the necessary formalities for both the ship and its cargo with different agencies.

perceived the Port of Rotterdam to be particularly vulnerable to corruption through blackmail of persons involved in the transport links of released goods with the hinterland from and to the port.

**Table 0-4: Resilience scores for the total package of measures in the Port of Rotterdam against the largest threats**

Threat	Resilience score (1 - 100)
1. <b>Law enforcement chain – bribery.</b> Corruption through bribery of employees of the public agencies responsible for supervision, detection and enforcement in the port, such as Customs, KMar, the HARC team, the National Police and the Seaport Police.	69,8
2. <b>Logistics chain and maritime transport – bribery.</b> Corruption through bribery of employees who facilitate in the modi operandi e.g., employees of shipping companies involved in the transport of goods by sea, such as shipowners and crews of container ships.	64,0
3. <b>Private guards and security chain – bribery.</b> Corruption through bribery of persons working for private security and surveillance companies at the port, such as security managers and employees of companies offering cargo checks.	66,9
4. <b>Ship's agent<sup>5</sup> – bribery.</b> Corruption through bribery of the ship's agent who have or provide authorised access to the port (e.g. to those involved in support activities, crew etc.).	62,9
5. <b>Logistics chain terminals – corruption through pressure in the workplace.</b> Corruption through pressures in the workplace that encourage individuals to look away and fail to fulfil their reporting duties.	64,8
6. <b>Maritime services – bribery.</b> Corruption through financial bribery of persons involved in support activities at the port who have or grant authorised access to the premises, e.g. employees of cleaning services, the ship's agent, suppliers and persons performing ship and container repairs.	65,6
7. <b>High authorisation.</b> Individuals with access to sensitive data and the ability to erase digital traces.	72,9
8. <b>Hinterland transport – blackmail.</b> Corruption through blackmail of persons involved in transport connections of released goods with the hinterland from and to the port, such as drivers (e.g. truckdrivers) including self-employed persons and employees of inland shipping companies, freight forwarders and other transport companies.	52,1
9. <b>Hinterland transport – Financial bribery.</b> Corruption through financial bribery of persons involved in transport connections of released goods with the hinterland from and to the port, such as drivers (e.g. truckdrivers) including self-employed persons and employees of inland shipping companies, freight forwarders and other transport companies.	62,9

Participants rated the Port of Rotterdam's resilience against corruption through bribery of law enforcement officials and corruption of persons with access to sensitive data as relatively high. Conversely,

<sup>5</sup> The ship's agent serves as the representative of a shipping company in a foreign port and aids the vessel's master in navigating customs clearance. They manage all the necessary formalities for both the ship and its cargo with different agencies.

the port's resilience against blackmail and bribery of individuals involved in hinterland transport was rated as relatively low.

## Key insights from the study

One of the main findings of this study is that experts rated corruption through bribery as a particularly important threat in both main ports. This underscores the substantial role that financial incentives play in corrupting individuals within the logistics chain and support services for the purpose of drug trafficking through main ports, which may provide important leads for policy development. Moreover, it is consistent with findings from previous studies on this topic. Existing literature consistently identifies the financial bribery of employees of public agencies as one of the most impactful corruption threats when it comes to facilitating drug-related crime. However, the results of our expert sessions also show that many policies have already been developed in this area for both main ports. Furthermore, they indicate that there are many measures already in place which aim at preventing, limiting and reducing bribery. This likely explains the relatively high estimated resilience of both Schiphol Airport and the Port of Rotterdam against this threat.

Corruption through social pressures in the workplace, leading individuals not to fulfil their reporting obligations when they witness criminal actions, was also identified as a key threat for both main ports. At Schiphol, this was felt to be important primarily in the baggage handling department, where some have identified a culture of silence which can be enforced with harsh measures such as bullying, intimidation and violence. In the Port of Rotterdam, this dynamic was perceived to play out throughout the entire logistics chain of container terminals. This threat is not so much about active participation in corrupt activities, but about the limited willingness to report such behaviour or confront colleagues engaged in corruptive behaviour. The results of the expert meetings show that this 'culture of looking away' is seen as an important mechanism in the context of drug-related corruption. Where workplace culture includes strong social pressure, such integrity violations can occur more easily because other employees who witness these actions may do not report them out of fear for repercussions.

Moreover, Schiphol Airport was considered by experts to be particularly vulnerable to corruption among key planners and brokers. In the Port of Rotterdam, resilience was rated lowest for blackmail and financial bribery in the logistics chain of goods towards the hinterlands. The heightened vulnerability attributed to these specific threats is not entirely unexpected, given that they transpire, at least in part, beyond the direct influence of the relevant main port authorities. Nevertheless, this discovery underscores the significance of pinpointing areas requiring heightened attention. It serves as a critical insight for potential future policy development, especially if subsequent research validates these findings.

However, we advise caution in interpreting the ranking of threats. In our view, the quantitative assessments and subsequent ranking mainly indicate that a number of issues are of particular interest to the expert group. The average weighted impact scores were relatively close for both Schiphol Airport and the port of Rotterdam. The same applies to some extent to the estimation of the resilience of policy instruments; here too, as already noted, the scores for both main ports were close to each other. This could reflect a lack of distinction between actual corruption threats, but it could also be a result of the application of the methodology and the associated limitations of expert judgement.

## Reflection on the method

This research is mainly based on expert consultation, supplemented by desk research and interviews. Consulting and integrating the views of experts with direct knowledge of the main ports can provide unique insights regarding the research questions, yet this method also has some limitations which should be highlighted.

First, the expert consultation process was conducted with a limited group of 8-20 experts involved in preventing and fighting corruption within the main ports, which may result in potential blind spots. Second, there are certain limitations regarding the way in which the NRA methodology was applied in this study. For instance, we found that the quantitative scores given during the consultations were influenced by the way the corruption threats or impact criteria were described. In addition, the consultation activities were not always easily applicable to the participants' views of the issues in question. For example, the process provided that the identification of key corruption risks was based on listing, ranking and assessing individual risks, while participants noted that in reality, a combination of different corruption risks often come into play.

Another factor relates to policy instruments. It proved difficult to compile a complete list of policy instruments because information about these is not always (fully) disclosed to the public. Participants also raised concerns about the fact that the lists of policy instruments only included 'external' instruments specifically targeting corruption, thus leaving the day-to-day roles and tasks of the organisations involved out of the analysis. Due to the strategic level at which the study took place, it was not considered practical to collect all measures at the organisation level.

Beyond these stated limitations, the methodology provides a valuable, structured way to identify risks and analyse these using expert judgement. In addition, the methodology provides effective triggers for experts to constructively share their opinions with the group. As a result, the NRA methodology can be seen as a useful tool for identifying and prioritising risks and policy instruments.