

FIGHT AGAINST ENVIRONMENTAL TERRORISM IN THE LIGHT OF INTERNATIONAL LAW

Mateusz Osiecki

Institute of Air and Space Law, Lazarski University in Warsaw, Legionow 71/73 m. 10, 91-070 Lodz,
Poland

Abstract

When someone is asked about the most urgent challenges that our world would face in current century, there is a high chance they would answer climate crisis and environmental downturn. And that would be totally true; ongoing climate change strongly affects access to and quality of natural resources that are constantly shrinking. Although international community treats seriously the problem of environmental degradation, certain problems related thereto might seem insufficiently tackled, including environmental terrorism – a form of terrorist attacks targeting natural resources. As such attacks have already occurred in the recent past and there is a risk they may be even more frequent in the future, necessary it is to answer a question whether international community disposes of accurate legal framework protecting environment from terrorist attempts. The paper, on the basis of analysis of legal documents (on global and European level) and views of the doctrine, discusses the efficiency of that framework and provides relevant critical commentary. In the light of growing threat from terrorists and decreasing amounts of resources essential for living, an academic voice in the field of environmental terrorism is necessary.

Key words: natural environment, resources, climate change, terrorism, international law

1. INTRODUCTION

Climate change and environmental decline are some of the most frequently discussed topics in public opinion in the recent years. And that is not without reason; the growing global economy is capable more than ever to satisfy continuous needs of consumers, but at the same time cost us as humanity increasing shortage of available environmental resources. Only in the last thirty years, the amount of fish decreased by 80-90% in some fishing waters, including coasts of Malaysia and Gulf of Thailand. (Popkiewicz, 2015). Also, in the same period the overall global loss of forested area reached 176 million hectares, an equivalent of total land territory of Indonesia (Ritchie n.d.).

Decreasing amounts of available resources has several consequences of both economic and social nature. Certainly, those materials that are less accessible and in result more difficult to obtain, have higher prices on the market. In some cases, a great shortage of a particular source can even contribute to outbreak of conflict in a region in which there is an urgent demand for it. Unsurprisingly, a type of resource for access to which multiple conflicts occurred is water. Solely in the period of 1990-2007, 83 such conflicts (of mostly violent character) took place, in all corners of the world (Gleick 2009).

Vital to mention here is also a fact that a particular type of environmental resources might be strategic for functioning of a given State. Certain countries' economies are based on exploitation of crude oil (including OPEC members), while others existence is strongly rooted in forests (Finland, Brazil, Russia). A fact that a given State's functioning is dependant on particular natural asset might in consequence increase the risk of being attacked by terrorists. In recent decades, terrorist networks have been focusing their strengths to hit sensitive targets, like airports, objects of infrastructure, embassies, or centres of commerce. However, continuous mankind's dependence on decreasing natural resources may convince terrorists to choose as future target of their attempts natural environment. Due to the fact, that environment is widely protected on global level and international community itself considers fight against terrorism one of its priorities (see: United Nations 2006), there is a need to verify accurate level of protection of environment from terrorist attacks on international arena. The hereby paper has as an aim analyse key legal instruments serving as a tool for such protection and critically

assess them, as well as propose solutions *de lege ferenda* that might improve it and therefore make environmental resources better secured from terrorists' activities.

2. “ENVIRONMENTAL TERRORISM” - EXPLAINING THE TERM

2.1. General remarks

Terrorism itself is a phenomenon discussed so widely in science and media, that it today has more than two hundred definitions, of either legal, political, or sociological origin (Aleksandrowicz 2008). Choosing a proper one encapsulating all its essential traits may be then a difficult task. Nevertheless, accurate for the purposes of hereby paper would be to define “terrorism” as unlawful usage of violence (or a threat thereof) that spreads fears among society, having as an aim realisation of specific goals (either religious or political) and affecting entities such as State or international organisation (Osiecki 2017).

From this definition one can easily conclude that natural environment can be perfectly a target of a terrorist attack. As it was mentioned in preceding paragraph, certain kinds of environmental resources might constitute a crucial element of a given country's *ratio status* and hence, a usage of violence that damages environment and equally creates deterrent among society might ultimately also affect a State, forced by perpetrators to follow their political goals. Important is to point out here that attack damaging natural resources can cause many deaths, significant losses and widespread chaos, which was affirmed by Chalecki (Chalecki 2002). Such form of terrorism would be then called “environmental terrorism”.

The notion “environmental terrorism” itself should be distinguished from another similar term, namely “eco-terrorism”. A clear differentiation of both was made *inter alia* by Spadaro; “eco-terrorism” should be interpreted as acts of violence damaging property conducted by individuals with an aim to defend the environment or provoke changes of environmental policy (Spadaro 2020). Groups or individuals representing that ideological camp were especially active in the United States between late 1980s and early 2000s. According to data published by FBI, they conducted in total 57 attacks in the period of 1986-2005, most of whom could have been assigned to notorious organisations, such as Earth Liberation Front, Animal Rights Militia, or Animal Liberation Brigade (Połuszna 2020).

In turn, “environmental terrorism” focuses on different types of targets and is committed for another purpose. As it was already mentioned, an “environmental terrorist” does not normally attack property (like public infrastructure, places of commerce, etc.) but causes destruction to environment – a typical form of such an attempt would be contamination of natural water reservoir, burning of large portion of forests, or killing a herd of animals endemic to a given region (more shall be discussed later in the paper). What is more, an environmental terrorist, in contrast to an eco-terrorist fights for different purpose: instead of willing to force a more nature-friendly policy from States or international organisations, he/she aims for fulfilling their political or religious demands (that doubtlessly would not refer to protection of environment, being their target of attack) (Chalecki 2002).

It is necessary to notice here, that some scientific resources (e.g. Encyclopaedia Britannica) treat both terms as synonyms, indicating either meaning of “eco-terrorism” or “environmental terrorism” as proper one. However, for the purpose of research in hereby paper, the distinction of the terms shall be maintained.

2.2. Exemplifications

For some audience, the term “environmental terrorism” might seem as purely academic, as terrorist attacks directed against natural resources are rarely seen in media coverage. However, both in past and present times one may indicate at least several organisations that conducted, or at least attempted to conduct acts of environmental terrorism.

One of the most notorious is al-Fatah, or “Palestinian National Liberation Movement”, a military-political group aiming at establishing an independent Palestinian State outside of Israeli sovereignty. In 1965, Fatah attempted to blow up pumps installed on Israeli National Water Carrier, with an intent

to breach the flow of water. The act of sabotage was ultimately detected by Israeli intelligence and disrupted (Amin 2013).

A successful strike was performed in turn by Al-Shabaab (“The Youth”), an Islamist insurgent organisation engaged in civil war in Somalia. As in 2014 it suffered several failures in their campaign against Somali government, it decided then to change its combat tactics into cutting off cities from water. In a southern city of Garbaharey, Al-Shabaab managed to destroy the supplies, by burying a borehole that provided water for the city's inhabitants. Several similar attempts were committed by the organisation in various other parts of the country (The World 2014).

Islamic State of Iraq and Al-Sham (or “ISIS”) is another example of a terrorist group that typed natural environment as their victim. ISIS frequently used arson as a weapon in fight against “infidels”, taking advantage from dry, hot and windy climate to coerce population. The group is believed to have caused massive wildfires of crops in Iraq and Syria, thereby destroying food supplies for a local communities. ISIS used such tactic to force local farmers to pay “taxes” on their benefit (Johnson 2019).

Above presented are just several of multiple acts of terrorism against natural environment that occurred in the past (see: Spadaro 2020). It is more than probable that due to shrinking amount of natural resources essential for global economy and individuals' well-being, combined with growing threat from extremist groups, such acts may repeatedly be performed in the future. Hence the need to assess framework of international legal provisions aiming at combatting environmental terrorism and discuss its efficiency in the light of current challenges.

3. INTERNATIONAL LEGAL FRAMEWORK

3.1. Overview

As it was mentioned already, fight against terrorism is one of top priorities of international community. United Nations General Assembly, in its Resolution 60/288, commonly named “Global Counter-Terrorism Strategy” enshrined the need to combat terrorism *in all its forms* (United Nations 2006) and stressed the necessity to prevent its spread. The document is composed of 4 pillars (1. addressing the conditions conducive to the spread of terrorism; 2. measures to prevent and combat terrorism; 3. measures to build States’ capacity to prevent and combat terrorism and to strengthen the role of the United Nations system in that regard; 4. measures to ensure respect for human rights for all and the rule of law as the fundamental basis for the fight against terrorism) and is normally reviewed every two years (United Nations n.d.).

United Nations by itself or via its specialized agencies, as well as the International Atomic Energy Agency (IAEA) are also responsible for having drafted nearly twenty international legal instruments oriented at elimination of different forms of terrorism and pursuit of their perpetrators that are open for participation to all UN Member States (United Nations n.d.). Although the scope of application of those conventions is generally wide (civil aviation, nuclear materials, protection of international staff, terrorist bombings), none of them *expressis verbis* refers to environmental terrorism. It is then truthful to affirm that on global level, natural environment suffers from weaker level of protection from terrorist acts than some other sectors.

However, one may not forget that apart from international legal instruments of global scope, there is a vast array of regional treaties that also tackle the problem of terrorism (more on types of international treaties: Shaw 2014). For the purposes of research covered by hereby paper, it is relevant to analyse two particular ones: The Arab Convention for the Suppression of Terrorism, done at Cairo on 22 April 1998 (hereinafter referred to as “Arab Convention”) and Treaty on Cooperation among the States Members of the Commonwealth of Independent States in Combating Terrorism, done at Minsk on 4 June 1999 (hereinafter referred to as “CIS Treaty”). The former one was drafted under auspices of League of Arab States, whereas the latter one – within Commonwealth of Independent States.

3.2. Arab Convention

Arab Convention in its Article 1 paragraph 2 stipulates that by “terrorism” understood should be [a]ny

act or threat of violence [...] that occurs in the advancement of an individual or collective criminal agenda and seeking to sow panic among people, causing fear by harming them, or placing their lives, liberty or security in danger, or seeking to cause damage to the environment [...] (League of Arab States 1998). Furthermore, under paragraph 3, a commission of such an act is criminalised and punishable by domestic law of States-parties to the Arab Convention. Already that *passus* shows the approach to the problem by the League of Arab States; a terrorist attack that causes damage to environment *sensu largo* (regardless whether it is directed against water resources, forests, agricultural areas) is treated equal to other terrorist offences that damage property, cause harm to persons, etc. and above all, should be subject to criminal punishment on the territory of all States-parties. Subsequent provisions of Arab Convention refer to more specific issues related to pursuit of offenders, judicial matters or prosecution and shall be briefly analysed here.

In similarity with many other counter-terrorist treaties, also Arab Convention observes the principle *aut dedere aut iudicare*, which is encapsulated in Articles 5-8. On its basis, State on whose territory perpetrator is present, should either bring them before justice on its territory, or extradite them to another State on its prior request for the purpose of trial, provided that the latter one has an objective interest in sentencing the perpetrator (Ostropolski 2008). A typical example would be a situation in which member of a terrorist group places explosives at Saudi oil extraction refinery that demolish the installation causing oil to spill and kill local wildlife ultimately flees to Egypt (that is a party to Arab Convention). Egypt would then track the offender and seize them, but decide to extradite them to Saudi Arabia (upon its request), as it was the country most harmed by the attack.

Moreover, under Arab Convention States-parties are prohibited to provide financial support towards environmental terrorism cause or serve their territory as base for attacks (Article 3). Therefore, each State-party is banned to allow terrorists to strike from their territory, even if terrorist attack is targeted at different States' territory. Other obligations include: exchange of information concerning activities and arms of terrorist groups (Article 4 I), mutual assistance in criminal investigation (Article 4 II), as well as broadly speaking judicial cooperation (Article 13 *et sub.*) (League of Arab States 1998).

In comparison to counter-terrorist treaties of global outreach (see: upper sub-paragraph), scope of regulation by Arab Convention is quite broad; it does not limit itself to criminalisation of terrorist offence and establishment of principle *aut dedere aut iudicare* as a basis for prosecution of offenders, but also strongly interferes with internal organisation of enforcement and judicial system of States-parties in order to make combat against terrorism more efficient.

3.3. CIS Treaty

In contrast to Arab Convention, CIS Treaty provides a narrower regulation of environmental terrorism. It is somehow manifested by a term “environmental danger” frequently evoked on pages of the Treaty. Although it is not defined by the document itself, one can easily conclude that it would mean generally all kinds of damage to natural environment. It is important to mention here also that CIS Treaty differentiates “terrorism” from “technological terrorism”. From the purpose of research covered by hereby paper, only latter term will be analysed. “Technological terrorism” is defined in Article 1 of the Treaty as follows: *the use or threat of the use of nuclear, radiological, chemical or bacteriological (biological) weapons or their components, pathogenic micro-organisms, radioactive substances or other substances harmful to human health, including the seizure, putting out of operation or destruction of nuclear, chemical or other facilities posing an increased technological and environmental danger and the utility systems of towns and other inhabited localities, if these acts are committed for the purpose of undermining public safety, terrorizing the population or influencing the decisions of the authorities in order to achieve political, mercenary or any other ends, as well as attempts to commit one of the crimes listed above for the same purposes and leading, financing or acting as the instigator, accessory or accomplice of a person who commits or attempts to commit such a crime* (Commonwealth of Independent States 1999). From such wording one may conclude that acts regarded as environmental terrorism are criminalised only if performed in a specific way: either with use of nuclear, chemical or biological weapons or other related factors. Acts like arson at the forest, or cutting off water supplies are normally excluded from this catalogue. In other words, destruction of environment is in the optic of CIS Treaty rather a result, than a principal target of a terrorist attack.

However, the scope of application provided by Article 1 is still quite broad. It criminalises multiple terrorist acts against natural environment, like destruction of oil/gas pipes that might cause disruption to local wildlife, contamination of natural resources or spill of radiological substance that might cause poisoning of animals, plants and humans. Furthermore, the term “environmental danger” is evoked again in the document in Article 5 obliging Parties to assist one another in assessing the condition of the system for physical protection of facilities posing an increased technological and environmental danger (let. e) and conducting research and development works that would improve such protection (let. j). In that way, CIS Treaty provides also preventive measures potentially reducing the risk of negative impact on the environment of any terrorist attack.

Subsequently, the Treaty covers several issues that were evoked in Arab Convention, like assistance in investigation (Article 2), principles of extradition of offenders (Article 4), or exchange of information between the Parties (Article 11).

Overall, the concept and wording of CIS Treaty in the light of fight against environmental terrorism should be well-rated. Although the document does not cover such terrorist crimes as broadly as the Arab Convention, it still obliges its Parties to criminalise acts involving biological, radiological, chemical or nuclear factors, which would account for some portion of environmental terrorism acts. Additionally, provisions requiring from States-Parties to assist each others in pursuing offenders may also contribute to better level of protecting environment from terrorism, especially, as currently many CIS members suffer from poor results in effective fight against crime (including Moldova, or Kazakhstan) (World Population Review 2021).

3.4. “Ecocide” and role of International Criminal Court

When conducting research on environmental terrorism, one may also encounter a term “ecocide”, derived from Latin and Greek, literally meaning “killing our home” that appeared first in academic discussion due to usage of Agent Orange by American army during Vietnam War (Doran, Killeen, McDermott, McErlean, Millar & Rodgers 2021). By “ecocide” understood should be intentional widespread of environmental destruction leading to catastrophic losses in natural resources. A proposal to regulate such behaviour as internationally recognised crime was brought by A.W. Galston, an American professor of biology who proposed an international agreement to ban “ecocide” at the Conference on War and National Responsibility in Washington in 1970 (Kaul 2021). The United Nations was addressing the question of criminalising ecocide several times and a significant attempt towards that was made in 1973, when Proposed International Convention on the Crime of Ecocide, inspired by R. Falk was drafted (Doran, Killeen, McDermott, McErlean, Millar & Rodgers 2021). The document in its Article I stipulated that “ecocide” should be treated as crime under international law, regardless whether is committed during time of peace or war. In turn, the Article II setted out the list of acts that might have been treated as “ecocide”, including use of chemical herbicides to defoliate or deforest natural forests for military purposes, or use of techniques designed to increase or decrease rainfall or otherwise modify weather as a weapon of war (Falk 1973). Although the draft has never been formally transformed into international legal instrument, the idea of establishing crime of ecocide went back on the agenda of international community in 21st century, once the Rome Statue of International Criminal Court (hereinafter abbreviated to as “ICC”) was created. Original projects of the Statue even included a crime of environmental destruction (alongside four others that are enshrined in Article 5), but it was ultimately removed after discordance from the side of the United States, the United Kingdom and the Netherlands (see more: Gauger, Rabatel-Fernel, Kulbicki, Short & Higgins 2012). However, the ecocide was not totally omitted in the final text of the Rome Statute, as it referred to the term in Article 8 establishing jurisdiction of the Court in regards to war crimes. It is then stipulated in paragraph 2 that war crime would account for (letter b), point iv) intentionally causing *widespread, long-term and severe damage to the natural environment*, particularly in the context of an armed conflict.

Although that *passus* may seem relevant for criminalisation of ecocide, its applicability is seriously limited, mostly due to condition of commission during international armed conflict. Simply speaking, if a mass destruction of environment is performed outside of warfare that is also international in its nature, it would not serve as a basis of prosecution by the ICC. Looking back at the issue of

environmental terrorism, it is clear that Article 8(2) let. b) point iv) does not constitute a sufficient legal protection against that heinous activity, as acts of environmental terrorism can be perfectly conducted outside of warfare (see: *supra*). Certainly, prosecution on the basis of ICC Statute can be initiated in the case when mass destruction of environmental resources is not an end, but a mean of committing one of crimes listed in Article 5. A good example is issuance of an arrest warrant against former Sudanese president, Omar Al-Bashir charged for multiple crimes, including contamination of wells and water pumps to target and destroy certain sets of people that accounted for crime of genocide (Kaul 2021).

3.5. Role of the European Union

It is undiscussable that the European Union (or 'EU') is one of world pioneers in terms of fight against international terrorism which is reflected by a motto featured on the webpage of Council of the European Union: *Terrorism threatens our security, the values of our democratic societies and the rights and freedoms of European citizens. Fighting terrorism is a top priority for the EU and its member states, as well as for its international partners* (Council of the European Union 2021). The EU strengthened its anti-terrorist measures after 2015, when the number of attempts on Old Continent has been constantly growing (Council of the European Union 2021). On 24 July 2020, the European Commission adopted EU Security Union Strategy featuring new solutions referring to cybersecurity, protection of critical infrastructure and fostering research and innovation in the field of counterterrorism.

When it comes to real legislative documents embodying EU's policy towards terrorism, the key act is Directive (EU) 2017/541 of the European Parliament and of the Council of 15 March 2017 on combating terrorism and replacing Council Framework Decision 2002/475/JHA and amending Council Decision 2005/671/JHA (hereinafter referred to as "Directive"). Its main objective is to establish common standards among Member States in criminalisation of certain intentional acts of terrorist character and unify system of prosecution and jurisdiction thereof. And although the Directive does not *expressis verbis* mention the term "environmental terrorism", it provides wide criminalisation of acts harmful to natural resources in its Article 3 paragraph 1. In let. g) by "offence" classified is *release of dangerous substances, or causing fires, floods or explosions, the effect of which is to endanger human life*, whereas in let. h) similarly classified is *interfering with or disrupting the supply of water, power or any other fundamental natural resource, the effect of which is to endanger human life* (European Parliament and the Council 2017). The condition to rate both offences as "terrorist" is that they are committed for one of purposes expressed in paragraph 2 (intimidation of population, compelling a State or international organisation to perform or abstain from an act, or serious destabilisation of fundamentals of a country or international organisation). Furthermore, Article 19 introduces a basis of mandatory jurisdiction of any Member State on whose territory the offence was committed.

Taking into account the above mentioned, one can conclude that Directive establishes solid grounds for pursuing offenders responsible for environmental terrorism within the European Union. Article 3 covers multiple cases in which a perpetrator interferes with natural resources for the purpose of achieving political or ideological goals, regardless whether such act occurs during times of war or peace. What is more, a crucial advantage that Directive has over international agreements is a fact that it binds Member States of the EU and has to be implemented by them, regardless of their will. That only makes mechanisms provided by the Directive more efficient.

On the other hand, something that seem lacking in the Directive is regulation oriented at criminalisation of attacks conducted against animals. Given the fact that in Europe lives around 1,700 endangered species, potential attempt on habitat of one of them might have significant impact on functioning of local environment and also be powerful weapon in hands of terrorist enforcing their political agenda. Therefore, a more complex regulation of environmental terrorism would require filling this gap. Overall, the approach taken by the European Union against the problem deserves approval.

4. FINAL REMARKS

It is difficult to hide that global problem of climate crisis, shrinking natural resources combined with growing demand for them makes protection of environment a top priority for international community. Protection would also mean security from terrorist attacks. Given the fact that certain natural resources might be also regarded as fundamentals for a particular State's sovereignty, an attack on them would considerably weaken the latter one and be a strong argument at the hands of terrorist organisation in pursuit of their political goals. A fact that environment was already a target of terrorist attacks at least several times in the past, only strengthens the argument.

However, the problem of combat against environmental terrorism seems to be undermined by international community. More than fifty years have passed since Galston made public his proposal on criminalisation of “ecocide”, which would in certain circumstances account for environmental terrorism and no international agreement of global reach has been drafted to cover the problem. Only a handful of regional relevant treaties were adopted, including CIS Treaty and Arab Convention to whom parties are just several dozens of States. Drafting a proper international convention protecting citizens of States against environmental terrorism would not be a difficult task, as the text thereof might be based on other anti-terrorist conventions that protect passengers from unlawful interferences on civil aviation, diplomatic staff from attempts on their lives, or global community against nuclear attacks.

Probably the greatest failure on international level was lack of regulating crime of destruction of environment by Rome Statute of ICC – given the fact that currently more than 120 States are parties to the Statute, such regulation would significantly improve fight against ecocide, as well as environmental terrorism. Vital is to note here that more and more political leaders call for such regulation, including French president, Emmanuel Macron and Pope Francis (Kusnetz 2021). If ICC wants to accurately face challenges of 21st century and respond to protect mankind from heinous attacks on natural resources essential for its existence, it should call for adding fifth crime to the list featured in Article 5 of Rome Statute.

To some extent, the gap in international provisions is filled by the European Union. The Counter Terrorism Directive from 2017 provides accurate mechanisms in combat against environmental terrorism, at least in comparison to solutions provided on international plane. Wide coverage of crimes and system of mandatory jurisdiction increases chances of putting a perpetrator before justice, regardless whether they would move from one Member State to another. However, due to a fact that Europe is not a principal “field of activity” of environmental terrorists (so far), solutions provided by the EU would have rather “accessorial” character in respect of potential international regulations that would adopted in the future.

Overall, the system of legal protection against environmental terrorism should be rated negatively; lack of proper actions on international arena that would have universal character make valuable natural resources and natural environment in general more and more vulnerable to future attacks. There are high chances that environmental terrorism shall become a powerful weapon of extremist organisations in pursuit of their goals and common international legal framework to eliminate that threat is urgent.

ACKNOWLEDGMENTS

The publication of hereby article was made possible by financing from Lazarski University in Warsaw.

REFERENCES

1. Aleksandrowicz, T 2008, *Terroryzm międzynarodowy*, Wydawnictwa Akademickie i Profesjonalne, Warszawa.
2. Amin, MAA 2013, 'Hydropower Resources as Target of Terrorism: Case Study of Selected Water Bodies In Northern Nigeria', *The International Journal Of Engineering And Science*, vol. 2, no. 11, pp. 52-61.
3. Chalecki, EL 2002, 'A New Vigilance: Identifying and Reducing the Risks of Environmental Terrorism', *Global Environmental Politics*, vol. 2, no. 1, pp. 46-64.
4. Commonwealth of Independent States 1999, *Treaty on Cooperation among the States Members of the Commonwealth of Independent States in Combating Terrorism*, Minsk, Art. 1-11.
5. Council of the European Union 2021, *EU's response to the terrorist threat*, 24 June, Council of the European Union, viewed 8 July 2021.
6. Doran, P, Killeen, R, McDermott, MC, McErlean, K, Millar, L & Rodgers, S 2021, *Criminalising 'Ecocide' at the International Criminal Court*, School of Law, Queen's University, Belfast.
7. European Parliament and the Council 2017, *Directive (EU) 2017/541 of the European Parliament and of the Council of 15 March 2017 on combating terrorism and replacing Council Framework Decision 2002/475/JHA and amending Council Decision 2005/671/JHA*, Official Journal of the European Union, L 88/6.
8. Falk, RA 1973, 'Environmental Warfare and Ecocide — Facts, Appraisal, and Proposals', *Bulletin of Peace Proposals*, vol. 4, no. 1, pp. 80-96.
9. Gauger, A, Rabatel-Fernel, MP, Kulbicki, L, Short, D & Higgins, P 2012, *Ecocide is the missing 5th Crime Against Peace*, The Ecocide Project, Human Rights Consortium, School of Advanced Study, University of London
10. Gleick, PH 2009, *Water Conflict Chronology. The World's Water, 2008–2009: The Biennial Report on Freshwater Resources*, Island Press, Washington, DC, p. 151–196.
11. Johnson, B 2019, 'ISIS Claims Escalating Use of Wildfire Arson as Terror Tactic', *Homeland Security Today*, viewed 23 June 2021, <<https://www.hstoday.us/subject-matter-areas/counterterrorism/isis-claims-escalating-use-of-wildfire-arson-as-terror-tactic/>>.
12. Kaul, A 2021, 'Reflecting upon the Scope of Action Relevant to the Crime of Ecocide, with Special References to the Case of Cambodian Farmers Before the International Criminal Court', *International Journal of Legal Developments and Allied Issues*, vol. 7, no. 1, pp. 47-55.
13. Kusnetz, N 2021, 'Ecocide' movement pushes for a new international crime: Environmental destruction', *NBC News*, 7 April, viewed 8 July 2021, <<https://www.nbcnews.com/news/world/ecocide-movement-pushes-new-international-crime-environmental-destruction-n1263142>>.
14. League of Arab States 1998, *The Arab Convention for the Suppression of Terrorism*, League of Arab States, Cairo, Art. 1-18.
15. Osiecki, M 2017, 'Terrorism vs. International Law – Case of Attacks in Brussels' ,5th International Conference of PhD Students and Young Researchers. How Deep is your Law? Brexit. Technologies. Modern Conflicts, University of Vilnius, Vilnius, pp. 280-287.
16. Ostropolski, T 2008, *Zasada jurysdykcji uniwersalnej w prawie międzynarodowym*, Instytut Wydawniczy EuroPrawo, Warszawa.
17. Psychology, Atlanta, Georgia, pp. 44-6.
18. Popkiewicz, M 2015, *Rewolucja energetyczna: Ale po co?*, Wydawnictwo Sonia Draga, Katowice.

19. Połuszná, E 2020, 'A Prognostic View on the Ideological Determinants of Violence in the Radical Ecological Movement', *Sustainability*, vol. 12, no. 6536, pp. 1-14.
20. Ritchie, H n.d., *Deforestation and Forest Loss*, viewed 23 June 2021, <<https://ourworldindata.org/deforestation>>.
21. Shaw, MN 2014, *International law*, Cambridge University Press, Cambridge.
22. Spadaro, PA 2020, 'Climate Change, Environmental Terrorism, Eco-Terrorism and Emerging Threats', *Journal of Strategic Security*, vol. 13, no. 4, pp. 58-80.
23. United Nations 2006, *Resolution 60/288: The United Nations Global Counter-Terrorism Strategy*, A/RES/60/288, viewed 23 June 2021, <<https://documents-dds-ny.un.org/doc/UNDOC/GEN/N05/504/88/PDF/N0550488.pdf?OpenElement>>.
24. United Nations, n.d., *UN Global Counter-Terrorism Strategy*, viewed 25 June 2021, <<https://www.un.org/counterterrorism/un-global-counter-terrorism-strategy>>.
25. United Nations Office of Counter-Terrorism, n.d., *International Legal Instruments*, viewed 25 June 2021, <<https://www.un.org/counterterrorism/international-legal-instruments>>.
26. World, The 2014, *Al-Shabaab's 'water terrorism' is yielding results and tragedy in Somalia's civil war*, viewed 23 June 2021, <pri.org/stories/2014-08-08/how-al-shabaab-using-water-tool-terrorism>.
27. World Population Review 2021, *Crime Rate By Country 2021*, viewed 25 June 2021 <<https://worldpopulationreview.com/country-rankings/crime-rate-by-country>>.