# Too secure to fail? Anti-corruption policies in the Port of Antwerp-Bruges

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## Abstract

In response to an increase in cocaine seizures and drug-related violence and growing evidence of corruption in Belgium, policymakers have strengthened maritime security measures in the Port of Antwerp-Bruges to address organised drug crime. However, corruption is not merely an enabler of such crime, but a phenomenon embedded within it.

This article draws on a 2013 assessment of the port, a literature review and 23 expert interviews. It explores current anti-corruption efforts in the port over the past decade through five key pillars: clearly defined roles within multidisciplinary collaboration, political support, evidence-based policymaking, a long-term focus and the flexibility to address emerging threats. The analysis highlights the motivations, objectives and challenges of involved actors, with particular attention to recent policy shifts.

Despite growing awareness, current measures remain largely focused on visible deterrence such as screening, port bans or technological tools, while overlooking the social, administrative and political dimensions of corruption. Addressing corruption requires moving beyond fragmented, short-term responses towards an integrity-based strategy that engages both public and private actors willing and able to drive organisational change. Pursuing the total eradication of corruption would be overambitious and risks undermining efficiency. Instead, progress should rest on shared responsibility, trust and sustained monitoring to prevent integrity fatigue. Belgium's advocacy for expanding the International Ship and Port Facility Security Code and the establishment of a national drugs agency offer opportunities for a more integrated approach.


**Keywords:** corruption, organised drug crime, Port of Antwerp-Bruges, maritime security, integrity.

# 1. Introduction

## Corruption embedded in the Port of Antwerp-Bruges

At the national level, corruption is defined in the Belgian Criminal Code as active and passive bribery of public officials under Articles 246 to 252. These provisions cover the solicitation, acceptance and offering of undue advantages. Articles 504-bis and 504-ter extend criminal liability to active and passive bribery in the private sector ([81]). However, corruption extends beyond these legal definitions, existing on a continuum of unethical behaviour, ranging from intimidation, extortion, nepotism, embezzlement, abuse of functions and obstruction of justice. Multiple stakeholders including officials, politicians, lobbyists, private sector actors and citizens partake in such behaviours, making a unified definition challenging (European Commission, 2023). Meanwhile, Belgium has ratified several international treaties to address corruption, including the Organisation for Economic Co-operation and Development (OECD) Anti-Bribery Convention (1997), the Council of Europe's Criminal and Civil Law Conventions on Corruption (1999) and the UN Convention Against Corruption (2003). More recently, the 2024 EU directive on combating corruption aims to harmonise gaps in European anti-corruption measures by setting minimum standards for defining, punishing and preventing corruption, alongside guidelines for more effective investigations and prosecutions (European Council, 2024; European Parliament et al., 2024a).

The broader reality of corruption extends beyond legal definitions and is especially apparent in strategic locations such as the Port of Antwerp-Bruges. Since its merger in 2022, the port has grown in size, economic activity and throughput. In 2023, the port handled 271 million tonnes of maritime traffic, an increase of 100 million tonnes compared with 2013 (Cools et al., 2013; Garyfallidou, 2024; Port of Antwerp-Bruges, 2024). This growth, combined with its strategic location and rising global cocaine production ([82]), made Antwerp-Bruges a gateway for illicit activities such as drug trafficking (De Middeleer et al., 2017; Colman, 2018; Verodova et al., 2023; Garyfallidou, 2024; Zürcher et al., 2024; Paoli et al., 2025). Containers are particularly attractive for drug traffickers due to their volume, the nature of goods transported, the limited visibility of contents and their high turnover (Staring et al., 2021; Zürcher et al., 2024).

Since 2004, the port has complied with the International Ship and Port Facility Security (ISPS) Code, by implementing fencing, cameras, scanners and port facility security officers (PFSOs) responsible for security planning (Cools et al., 2013; Nelen et al., 2021; Port of Antwerp-Bruges, 2024). However, as the ISPS Code excludes inland ports, this creates a potential displacement effect to less regulated areas (Staring et al., 2021). In response, the Belgian Maritime Security Act of 2023 introduced technological and physical security measures for inland navigation, reflecting a political will to close security gaps (Team Justitie, 2024; Struys, 2024; De Wever, 2025). While these measures reduce opportunities for offenders, strengthen seaport security and enhance surveillance (Staring et al., 2021), they do not address the fragmentation of global port security standards. A more effective response would be to expand the ISPS Code itself, thereby strengthening the fight against organised crime. Although Belgium advocates this expansion (De Wever, 2025), the absence of reliable, evidence-based data makes it difficult to assess the necessity and likely effectiveness of these enhanced security standards.

([81]) Loi du 10 février 1999 relative à la répression de la corruption, Moniteur Belge, 10 février 1999.

([82]) Cocaine is the most prominent drug imported through the Port of Antwerp-Bruges, which is known as one of the gateways for cocaine into Europe (De Middeleer et al., 2017; Colman, 2018; Verodova et al., 2023; Garyfallidou, 2024; Zürcher et al., 2024; Paoli et al., 2025).

Although pioneering research identified barriers to a fully integrated approach to port security, the impact of corruption was often overlooked (Cools et al., 2013). For years, it was not considered a priority in combating illicit smuggling (Staring et al., 2021; Staring et al., 2023). However, as port security tightened, organised crime groups (OCGs) sought to bypass controls by gaining access to individuals or information systems (Depuydt et al., 2020; Staring et al., 2021; Nelen et al., 2021; Staring et al., 2023; Zürcher et al., 2024; Europol, 2025). The 2021 Sky ECC investigation exposed how OCGs used encrypted messaging to approach port insiders, such as dockworkers, transport operators, prosecutors and those working in law enforcement or customs (Federale Politie, 2021; Paoli et al., 2025). These so-called 'screen readers' have access to confidential data, such as national registers, licence plates, container locations or logistics data, making them vulnerable to corruption (Struys, 2024). Bribery has since become a key enabler for infiltrating ports and logistics chains, allowing OCGs to conceal illicit goods (Europol, 2023a; Verodova et al., 2023; Zürcher et al., 2024).

## Too many hands, too little power?

The 2002 Ministerial Directive ([83]), assigns the Federal Police a leading role in investigating corruption. Within its structure, the Office Central pour la Répression de la Corruption (OCRC), established in 1998, is also mandated to address corruption. Although their resources have improved in recent years, its workforce has diminished from 120 in 2000 to just 66 in 2024 (Openbaar Ministerie, 2022; European Commission, 2024a; Federale Politie, 2024b). As a result, the unit remains largely reactive, relying on complaints or media reports to initiate corruption investigations (GRECO, 2020). Meanwhile, the Federal Maritime Police support corruption investigations through first-line assessments in the port, while also focusing on border control, illegal immigration, drug trafficking, environmental crimes, theft and terrorism. Despite their expertise, the growing workload and limited capacity hinder proactive and preventive measures, creating gaps that OCGs may exploit (Cools et al., 2013; Eski et al., 2020). Respondents voiced frustration over the Federal Police's limited capacity, especially when compared with the resources of the local police. The 181 local police zones maintain disparate integrity policies and smaller police zones are not maintaining an effective integrity policy (European Commission, 2025). Key recommendations such as a code of conduct for the entire police force proposed by the Group of States against Corruption (GRECO), have not been implemented, and overall, police integrity policies are still assessed as insufficient (European Commission, 2025). This fragmentation and lack of coordination within Belgian law enforcement have created opportunities for OCGs to expand their operations (Verodova et al., 2023).

Customs assists the Federal Police by conducting risk analyses based on the entry summary declaration ([84]) and the bill of lading ([85]) to identify suspicious high-risk shipments for inspection. If illicit activities are detected, the Federal Police take over to investigate the individuals or OCGs involved (Colman, 2018).

Judiciary actors are responsible for prosecuting corruption, with a federal prosecutor investigating corruption cases referred by the European Anti-Fraud Office (Openbaar Ministerie, 2022). However, following the merger of the ports, the port is located in three municipalities: East Flanders, West Flanders and Antwerp (Garyfallidou, 2024; Port of Antwerp-Bruges, 2024). This division poses challenges for legal proceedings, requiring coordination across different

([83]) Directive relative à la répartition des tâches, à la coopération, à la coordination et à l'intégration entre la police locale et la police fédérale en matière de missions de police judiciaire, Moniteur Belge, 1 mars 2002.

([84]) The entry summary declaration must be submitted for all goods on board a vessel entering the EU. Customs require this declaration to know the contents of the vessel (Colman, 2018).

([85]) A bill of lading serves as a document of title, a receipt for shipped goods and a contract between a carrier and a shipper (Colman, 2018).

prosecutorial priorities, and legal interpretations (see below). Nevertheless, the College of Prosecutors-General's network on corruption aims to overcome these barriers by facilitating information sharing among prosecutors (Openbaar Ministerie, 2023).

*I still have the impression that public actors believe they can address corruption alone and view us as the enemy.*
Port authority

Port authorities also play a key role in maintaining security and protecting the port's reputation (Cools et al., 2013). They serve as a node in the information chain, sharing intelligence with port companies, which are in turn encouraged to report suspicious activity to law enforcement, helping to identify OCGs operating in the port (see below). However, addressing corruption requires trust and the willingness to share information between public and private actors, along with legal frameworks and clear communication channels. Only through collective action can the private sector contribute to the systematic changes needed in the port environment (Depuydt et al., 2020; Torbrand, 2022; De Wever, 2025).

This article focuses on the role of corruption in relation to organised drug crime in the Port of Antwerp-Bruges. Corruption is a cross-border phenomenon with social and environmental implications, undermining economic growth and swiftly adapting to new opportunities (Torbrand, 2022; Verodova et al., 2023; European Commission, 2024a; Europol, 2025). Respondents indicate that OCGs continue to exploit vulnerabilities within the port supply chain (see below), prompting policymakers to call for immediate interventions. In addition, the 2024 Eurobarometer revealed that 66 % of 1 047 Belgian citizens consider corruption within government institutions is widespread, a 4 % increase from the previous year (European Commission, 2024b). The 2025 Special Eurobarometer on Corruption shows that 59 % of 1 006 respondents consider corruption widespread in Belgium (European Commission, 2025). Such perceptions erode public trust in governance and law enforcement (Europol, 2025). Therefore, public perceptions, political pressure and economic factors have shaped the evolving concept of corruption, which now drives proposals for international cooperation (Janssens and De Vos, 2019; European Commission, 2023). According to Transparency International, effective anti-corruption strategies rest on five key pillars: clearly defined roles within multidisciplinary collaboration, political support, evidence-based policymaking, a long-term focus and the flexibility to address emerging threats (Torbrand, 2022; Jenkins and Camacho, 2022). Following a brief explanation of the methodology, the main findings are presented chronologically according to the legislative periods during which anti-corruption measures were introduced or implemented in the Port of Antwerp-Bruges since 2013. Emphasis is placed on recent developments between 2019 and 2024, a period during which corruption (re)gained policy attention. Each measure is assessed in terms of its alignment with the five pillars. A concluding discussion draws together key sociological and criminological considerations.

## 2. Methodology

This research draws on data collected as part of the Poseidon (ports united against corruption) project, funded by the EU's Internal Security Fund. The project aims to enhance anti-corruption measures within EU seaports ([86]).

([86]) Between March 2023 and March 2025, the project assessed corruption vulnerabilities and identified good practices in the ports of Rotterdam, Antwerp-Bruges, Algeciras, Cartagena, Venice and Piraeus. It also established an EU network of public–private port stakeholders to improve communication and information exchange in the port sector.

## Data collection

Between October 2023 and February 2024, the author conducted 23 in-depth expert interviews (see Annex 14.1). A semi-structured questionnaire guided the interviews, focusing on motivations, objectives and the challenges faced in implementing anti-corruption measures. Respondents were selected based on their involvement in anti-corruption efforts in the Port of Antwerp-Bruges, with additional participants identified through snowball sampling. The interviews were voluntary, lasted one to two hours and were conducted either online or in person. All participants were informed about the study, gave written consent and had the option to decline specific questions or withdraw at any time. Some individuals declined to participate due to concerns about reputational damage or prior negative experiences with similar research. In parallel, a scoping literature review was conducted, covering the period from 2013 to 2025. This review included both academic and grey literature, such as peer-reviewed articles, research reports, news media, policy papers and internal documents provided by respondents. Emphasis was placed on sources that capture the national context of anti-corruption efforts in the Port of Antwerp-Bruges. Relevant publications were identified using databases such as Google Scholar and the Web of Science, applying Boolean search strategies with keywords including 'corruption', 'seaports', 'integrity', 'organised crime', across both Dutch- and English-language publications.

## Data management and analysis

The recorded interviews were transcribed and anonymised to ensure participant confidentiality. To ensure data reliability, certain quotes were adjusted for clarity while preserving their original meaning. The data were manually coded and analysed to identify recurring themes, without the use of digital software tools.

## Limitations

This article is primarily exploratory and descriptive, which may limit its depth. Given the researcher's background in criminological science, the analysis is grounded mainly in sociological and criminological perspectives. The insights obtained from experts may also be influenced by their familiarity with the sector. Moreover, the voluntary nature of their participation may have limited diversity of perspectives, as those with negative experiences may not participate. Finally, the focus on recent policy priorities may have shaped public perceptions of corruption.

# 3. Drugs and corruption: implications for port security

## 2010–2014: caught between reluctance and inability

In 2013, the Port of Antwerp recorded five tonnes of cocaine seizures, an amount comparable to the drug seizures at the Port of Rotterdam in 2017 (Colman, 2018; Depuydt et al., 2020) ([87]). However, a lack of political will and insufficient resources hindered efforts to address corruption, fraud and financial crime. The growing focus on counterterrorism often led to investigations not being opened or to corruption cases expiring (OECD, 2013; European Commission, 2014; Openbaar Ministerie, 2015). As a result, national security plans ([88]) no longer prioritised these types of crime. Additionally, the absence of disciplinary measures in public services and a whistleblower protection system continued to hinder progress in corruption cases (Maesschalck, 2012). These shortcomings ultimately led to Belgium being criticised by the OECD in 2013 for its passive approach to cross-border corruption (OECD, 2013).

([87]) Seizure figures do not reflect the total volume of imported drugs, as the true figures are dark numbers. Although rising seizures may suggest increased enforcement or a more serious problem, they do not necessarily indicate a growth in drug trafficking (Staring et al., 2023).

([88]) The national security plan (*Nationaal Veiligheidsplan*) and the integrated security framework (*Kadernota Integrale Veiligheid*).

## 2014–2019: the limits of an unfinished fight

Cocaine seizures at the Port of Antwerp increased tenfold, reaching 60 tonnes in 2019, alongside a rise in drug-related violence (Colman, 2018; Staring et al., 2021) ([89]). This increase in seizures was driven by strengthened collaborations between Dutch and Belgian OCGs, who expanded their influence in the ports of Antwerp and Zeebrugge (Colman, 2018; InSight Crime, 2020). In 2018, the Belgian federal government introduced a local plan (*Stroomplan*) to address drug trafficking in the Port of Antwerp, through multidisciplinary collaboration among 60 partners, including law enforcement agencies, customs agencies, prosecutors, port authorities, inspection services and government agencies (Colman, 2018; Easton, 2018). The plan focused on four areas: (1) creating barriers within the port, (2) targeting OCGs and the underground economy, (3) enhancing investigations into organised crime and (4) developing anti-corruption policies within public services (Colman, 2018). A joint taskforce (KALI) was set up, with the Belgian Federal Police taking a more proactive role and reintroducing intelligence-led policing, a concept first introduced in 2007 to address shortcomings in information-driven policing. By collaborating with the involved partners, they sought to improve the understanding of corruption related to the financial flows of OCGs (Easton, 2018; Colman, 2018; Geens and Jambon, 2019). Additionally, the local police enhanced information-sharing within the port through a neighbourhood information network, raising awareness about suspicious activities among port companies and enabling targeted police actions (Eski et al., 2020). While this approach encouraged proactive information exchange, it largely remained reactive, focusing on targeted police interventions. Through memorandums of understanding and operational action plans with Latin American countries, information sharing was strengthened (Colman, 2018; InSight Crime, 2020). Despite these efforts, understaffing at the OCRC continue to impede corruption investigations (GRECO, 2020; Openbaar Ministerie, 2021; Federale Politie, 2024b). Moreover, sharing information between public and private actors is not always desirable or feasible without breaching confidentiality. A regulatory framework is needed to enable multidisciplinary cooperation. Respondents voiced criticism by questioning whether policymakers had overlooked this when announcing the *Stroomplan* and its measures.

*There is a strong desire for immediate statements, but given the scale of the problem, patience is crucial.*

Port company

The measures, including scanning equipment, automatic number plate recognition cameras, smart seals, fines for avoiding scans and awareness campaigns for drug extractors are primarily repressive, targeting the supply side rather than addressing the root causes of drug trafficking (Colman, 2018). Although necessary, integrity measures for the involved partners were perceived to slow logistics, and alongside high workloads and societal and political pressure, contributed to the ending of the development of an anti-corruption policy in 2019 (Atillah, 2020; InSight Crime, 2020). The evaluation of the *Stroomplan* called for a systematic, well-monitored approach to organised drug crime, one that ensures a chain-oriented strategy with both policy and operational capacity, while promoting information sharing (Colman, 2018; InSight Crime, 2020). While the *Stroomplan* takes several steps in the right direction with political support and establishing a multidisciplinary collaboration, policymakers should reconsider the focus on visible, reactive measures targeting the drug market, as they may undermine long-term impact.

([89]) Given the dark number, these quantities likely represent only a portion of the overall drug supply (Staring et al., 2021).

## 2019–2024: increased efforts, persistent gaps

Cocaine seizures in Belgian ports continued to increase, reaching a record of 121 tonnes in 2023 (Verodova et al., 2023; Federale Politie, 2024a). The COVID-19 pandemic did not disrupt this trade; instead, seizures increased as maritime shipping remained unaffected, allowing OCGs to continue trafficking (Depuydt et al., 2020). Furthermore, OCGs use visible violence, such as explosions and arson, or invisible violence, including threats, torture and kidnappings targeting law enforcement, journalists and bystanders (Verodova et al., 2023; Paoli et al., 2025). This violence ensures that corrupt actors remain compliant, but it also contributes to growing public unrest (Verodova et al., 2023; Zürcher et al., 2024; Europol, 2025; Paoli et al., 2025). The violence peaked with the tragic death of an 11-year-old girl in 2023, leading to, among other measures, stricter screening of dockworkers. In Belgium, port work is regulated and restricted to recognised dockworkers ([90]), who, according to respondents, are currently only required to present a certificate of good conduct. In some cases, family ties and friendships have formed the basis for access to the port. However, economic growth has increased reliance on temporary labour, which raises security concerns (Eski et al., 2020; Staring et al., 2021; Staring et al., 2023). Unlike dockworkers, occasional workers are not covered by the law and therefore are not subject to the same level of monitoring, making them vulnerable to criminal infiltration (Depuydt et al., 2020; Eski et al., 2020; Zürcher et al., 2024). Given that Sky ECC confirms nearly all port positions are vulnerable to such infiltration (see above), the Maritime Security Act now requires security clearance or advice for both public and private employees in high-risk port positions to access confidential information (Daems, 2021; Kir, 2023; Team Justitie, 2024; De Wever, 2025). These security verifications are conducted by the Federal Police, the State Security Service and the General Intelligence and Security Service (Federale Politie, 2024a). Although periodic screening enjoys political support, respondents argue that it once again lacks the long-term vision and flexibility needed to address threats across all 162 000 direct and indirect port positions. Moreover, increased scrutiny may heighten pressure on screened individuals, making them more susceptible to corruption or displace OCGs to less regulated areas. To mitigate this, information on screened individuals and database access must be shared with EU Member States (De Wever, 2025). Meanwhile, the Federal Police face ongoing resource shortages that hinder their core responsibilities, while structural vulnerabilities, such as reliance on temporary labour, negative media portrayals of port work and difficult working conditions that hinder recruitment, remain unaddressed.

*Reliance on occasional workers is a risk: they may be a financial stopgap, but they know their way around the port very well.*
Labour union

Respondents emphasised that technological measures could enhance compliance and integrity systems, improve coordination and increase transparency. By preventing unauthorised access to port areas and limiting leaks of sensitive information about port operations, these measures contribute to a more secure and efficient port environment. To address PIN code fraud ([91]), Antwerp, Rotterdam and Hamburg/Bremerhaven container terminals implemented Certified Pick up (CPu), a blockchain-based platform integrating identity verification, authorisation and customs approval to strengthen access control (Port of Antwerp-Bruges, 2024; Europol, 2023b). Previously, PIN codes were not tied to specific individuals and were often shared with OCGs (Europol, 2023b). With CPu, access to

(90) Arrête royal du 5 juillet 2004 relatif à la reconnaissance des ouvriers portuaires dans les zones portuaires tombant dans le champ d'application de la loi du 8 juin 1972 organisant le travail portuaire, Moniteur Belge, 4 août 2004.

(91) PIN codes are used by shippers and freight forwarders to release the container for onward transport by transport operators at the port of arrival (Europol, 2023b).

confidential information is now more restricted (Port of Antwerp-Bruges, 2024). However, this might shift corruption vulnerabilities to other professions with access to digital systems, such as transport operators, IT companies or customs authorities, who could face increased pressure to manipulate container checks or expedite approvals (European Commission, 2024a; Staring et al., 2023; Zürcher et al., 2024; Europol, 2025). CPu should be implemented nationwide and extended beyond container traffic to prevent displacement effects. Additionally, ongoing investment in digital infrastructure is needed to prevent outdated systems from being exploited by OCGs. Without adequate cybersecurity, these systems remain vulnerable to misuse. Furthermore, digital systems should be part of a broader anti-corruption strategy and supported by an organisational change for lasting impact.

*OCGs find new ways to exploit digital systems because they can still corrupt people. While technology plays a crucial role, human psychology remains the key factor in prevention.*
Law enforcement official

While technological security measures evolve in the port, they alone cannot prevent corruption without integrity policies that promote reporting and awareness (Easton, 2018; Eski et al., 2020). Eurobarometer data shows that 1 047 Belgian citizens are less willing to report corruption due to challenges in providing evidence (55 %), not knowing where to report (36 %), fear that reporting is futile (31 %), reluctance to betray others (28 %) and a lack of protection for whistleblowers (25 %) (European Commission, 2024b; Zürcher et al., 2024). By the end of December 2022 ([92]), anonymous external reporting platforms for government bodies and law enforcement agencies were introduced under the 2019 Whistleblower Protection Directive ([93]), offering legal safeguards against retaliation. PortWatch was launched to extend these protections to the maritime sector, streamlining existing reporting channels in Belgian ports and strengthening law enforcement investigations into corruption (Port of Antwerp-Bruges, 2024; Team Justitie, 2024). Meanwhile, on an international level, the Maritime Anti-Corruption Network (MACN) facilitates anonymous reporting through the Global Port Integrity Platform. The platform provides port integrity risk scorecards to identify corruption risks and support collective action (MACN, 2023). Future evaluations by the Federal Police are needed to assess whether PortWatch improves information flow and supports a systematic evidence-based anti-corruption approach.

*These efforts must be regularly updated and monitored to remain relevant, as the lack of reporting creates a knowledge gap.*
Law enforcement official

Meanwhile public–private campaigns like 'our port drug-free' empower port employees to recognise threats, resist coercion and report suspicious activities, thereby strengthening their resilience against criminal infiltration (Cepa and Alfaport Voka, 2024; Port of Antwerp-Bruges, 2024). Respondents emphasised that expanding these efforts to logistics students, management and operational staff promotes a culture of integrity within the broader port community. However, Transparency International warns that highlighting the prevalence or immorality of corruption can backfire, normalising it as an inevitable part of the system, instead of changing behaviour (Ishikawa, 2024; Europol, 2025). A victim-centred approach that focuses on positive role models and uses engaging, context-specific

([92]) Loi du 8 décembre 2022 relative aux canaux de signalement et à la protection des auteurs de signalement d'atteintes à l'intégrité dans les organismes du secteur public federal et au sein de la police intégrée, Moniteur Belge, 8 décembre 2022.

([93]) Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, 26.11.2019, p. 17, ELI: http://data.europa.eu/eli/dir/2019/1937/oj).

formats would be more beneficial (European Commission, 2024a; Ishikawa, 2024; European Commission: Directorate-General for Migration and Home Affairs et al., 2024).

Nevertheless, motivation for acting with integrity is often lacking, as institutional transparency is perceived as a significant hurdle that slows logistical processes (Atillah, 2020; Eski et al., 2020; Daems, 2021; Staring et al., 2021; Staring et al., 2023). While respondents emphasised measures such as dilemma training or codes of conduct, they often remain isolated, with limited monitoring and enforcement, leading to fragmented and outdated initiatives. Integrity efforts tend to be driven more by societal or political pressure, or concerns about staff well-being and organisational reputation, rather than by strategic priorities. As a result, excessive focus on integrity can generate fatigue and foster an 'ethics industry', while pursuing the total elimination of corruption may be overambitious and undermine efficiency. To be effective, anti-corruption strategies must therefore be evidence-based, regularly updated and structurally funded to enable cross-border implementation and long-term impact (Anechiarico and Jacobs, 1996).

## 4. When every actor moves alone

### Judiciary

*Follow the money, and you will find corruption? Criminals do not keep records of their corrupt activities.*

Public prosecutor

The judiciary has been strengthened with criminologists, legal experts, liaison magistrates and a port prosecutor to implement a unified port security policy (Gezelle, 2024). Since October 2021, an amendment to Article 4 of the Act of 24 February 1921 ([94]) allows Belgian judges to impose port bans of up to 20 years on individuals or entities guilty of drug-related offences or maritime security violations (Team Justitie, 2024). These bans restrict access to and employment within the maritime sector, aiming to address criminal infiltration (Team Justitie, 2024). However, their enforcement remains inconsistent across three judicial districts (see above) and raises concerns about stigmatisation and hindering rehabilitation (De Rechter, 2020). Looking ahead, the new government plans to establish a specialised prosecution service for financial crime and corruption, enabling a 'follow-the-money' approach against OCGs (European Commission, 2025; De Wever, 2025).

### Law enforcement

While corruption presents unique challenges in investigations (Federale Politie, 2022), there is growing public and political support for a 'follow-the-money' approach to dismantle OCGs (Cel voor Financiële Informatieverwerking, 2023; Gezelle, 2024). In response, the Federal Police will collaborate with the new financial crime division within the federal prosecutor's office, a multidisciplinary financial and tax investigation unit under the Ministers of Finance and Justice, the National Drugs Agency and the Financial Intelligence Processing Unit to address the financial flows of OCGs (De Wever, 2025). Although the Federal Police employed 13 979 employees as of December 2024, with 13.2 % of their resources dedicated to corruption, they still lack the resources and expertise in financial and economic investigations (Federale Politie, 2024a). Allegations of information leaks in corruption investigations and undue

([94]) Act of 27 March 2023 amending the Act of 24 February 1921 concerning the trade in toxic substances, hypnotics and narcotics, psychotropic substances, disinfectants and antiseptics, and substances that may be used for the illegal manufacture of narcotics and psychotropic substances, Moniteur Belge, 3 April 2023.

political influence concerning the work of the OCRC have raised concerns among civil society, potentially undermining public trust in law enforcement (European Commission, 2025). In response, the new government announced screening and integrity checks throughout police officers' careers, during recruitment, selection and training (De Wever, 2025).

In 2023, the National Drugs Agency, responsible for the coordination of the fight against drug-related crime ([95]), established a fund to reinvest confiscated criminal proceeds into law enforcement and healthcare (Kir, 2023; Cel voor Financiële Informatieverwerking, 2023; Gezelle, 2024). At the European level, the revision of the Asset Recovery Directive emphasises asset seizure as a cornerstone to addressing organised crime ([96]). Yet in practice, only 2.2 % of criminal assets are frozen and 1.1 % are confiscated (Transparency International, 2024). To support the Federal Maritime Police, the government established a Port Security Corps, adding 70 security officers to increase their first-line assessments (Kir, 2023; Federale Politie, 2024a). By mid 2024, only 49 officers were operational (Verlinden, 2024). Additionally, a new investigative service within the Federal Maritime Police was established to deter criminal activities in the port (Federale Politie, 2024a; Verlinden, 2024). However, deterrence alone does not discourage criminal behaviour (De Rechter, 2020). Recognising the undermining effects ([97]) of organised drug crime, both national and European authorities invested in an administrative approach aimed at disrupting the infiltration of OCGs into maritime logistics (Paoli et al., 2025). To better conceal their illicit goods, they exploit legal economic structures, increasing the risk of reputational damage to the legal sector (Staring et al., 2023; Verodova et al., 2023; Paoli et al., 2025). Therefore, the Law on Municipal Administrative Enforcement, introduced on 7 February 2024 ([98]), empowers local authorities to revoke or deny business licenses for companies linked to financial crimes, money laundering or the facilitation of criminal influence (Wittevrongel and De Jaeger, 2024). These decisions rely on advice from the Directorate for Integrity Assessment of Public Authorities, under the Ministry of Interior, which can introduce delays and administrative bottlenecks. Moreover, such measures must be carefully balanced, as OCGs adapt by displacing their activities to less regulated sectors (Staring et al., 2023; Wittevrongel and De Jaeger, 2024).

## Customs

OCGs or corrupt employees can bypass, manipulate or falsify risk analyses, and tamper with or remove container contents (Colman, 2018). In response, the Belgian government has strengthened customs capabilities by investing in mobile scanners to screen 100 % of high-risk containers and additional personnel, allowing a more proactive, intelligence-driven approach (Kir, 2023; Team Justitie, 2024; Port of Antwerp-Bruges, 2024; De Wever, 2025). However, enforcement remains limited. First, monitoring 271 million tonnes of maritime traffic is unfeasible, with only 1.5 % of all incoming cargo being scanned (Verodova et al., 2023; Port of Antwerp-Bruges, 2024). Second, customs operations are divided between two departments: operations, responsible for goods declarations in ports, and investigations, which focuses on fraud and smuggling (Federale Overheidsdienst Financiën, 2022). Although both conduct risk analyses on the flow of goods, respondents emphasise that coordination between them is unclear, leading to fragmented information-sharing with other port stakeholders.

([95]) Loi du 7 avril 2023 relative à la création, aux missions et à la composition d'un commissariat national drogue, Moniteur Belge, 7 avril 2023.

([96]) Proposal for a Directive of the European Parliament and of the Council on asset recovery and confiscation, 25 May 2022.

([97]) Despite lacking a universally agreed definition, 'undermining' is frequently associated with the societal harms of organised drug crime (Staring et al., 2023; Paoli et al., 2025).

([98]) Loi du 7 février 2024 relative à l'approche administrative communale, à la mise en place d'une enquête d'intégrité communale et portant création d'une Direction chargée de l'Évaluation de l'Intégrité pour les Pouvoirs publics, Moniteur Belge, 7 février 2024.

*It is not always clear which department within customs should be notified.*

Port company

In response, efforts are underway to revise and clarify the customs criminal law (Cepa and Alfaport Voka, 2024). The European Commission proposes replacing existing IT systems with a centralised data hub to harmonise risk analyses and criteria across the EU (European Parliament et al., 2024b). Furthermore, a European customs authority will coordinate national efforts and support Member States in identifying high-risk shipments (European Parliament et al., 2024b). At the national level, the digital customs platforms of Antwerp and Zeebrugge ports will be integrated to improve information exchange and streamline logistics (Jacobus, 2025).

## Port companies

*Port companies are willing to cooperate, provided it is economically feasible.*

Port company

It was not until 2023 that Belgium and the Netherlands agreed with five port companies to address organised crime through measures such as high-risk container seals, smart cameras, drones, screening policies and cross-border information exchange (Kir, 2023; Rijksoverheid, 2023; De Wever, 2025). In the port of Zeebrugge, a central security control room coordinates surveillance with port authorities and the local police (Port of Antwerp-Bruges, 2024). While these cameras are not inherently 'smart', they are connected to automatic number plate recognition databases, which improves the detection of suspicious activities (Fiers, 2023). However, these measures remain reactive, identifying activities only after they occur. The federal government has emphasised that responsibility for implementation lies with port companies (De Wever, 2025). However, the main challenge is balancing security with economic competitiveness, as stricter measures in one port may displace OCGs to other areas.

## International partners

As global trade and organised crime became transnational, addressing corruption in seaports emerged as a priority for the EU, its Member States and international partners (Europol, 2025). Organisations such as the OECD, the European Union Agency for Law Enforcement Cooperation (Europol), the Group of States against Corruption (GRECO), the European Multidisciplinary Platform Against Criminal Threats (Empact), the World Customs Organization or the MACN highlight the need for knowledge sharing and constant vigilance to develop an integrated approach to port security, to identify corruption trends and enhance both security and trade efficiency (European Commission, 2023). However, caution is warranted: in 2024, only 40 tonnes of cocaine were intercepted. While this decline may reflect the success of improved enforcement and collaborations, it could also indicate that OCGs are adapting. By shifting their activities to inland waterways, bulk cargo, airports or using modi operandi such as the drop-off and rip-off method, they continue to evade detection (Staring et al., 2023; Verodova et al., 2023; Decré, 2025; Paoli et al., 2025). These methods usually depend on corruption to succeed (Verodova et al., 2023).

*Our projects and support team focuses solely on gathering and exchanging information at national and international levels. Centralising this data allows us to identify patterns and enhance anti-corruption efforts in the port.*
Law enforcement official

The federal government emphasised strengthening liaison officers in non-EU countries to enhance the sharing of preventive measures and security standards (De Wever, 2025). While law enforcement collaborates with (inter) national port authorities, common efforts should be made across the entire EU, and globally, to mitigate a displacement effect by the development of legal frameworks and policy guidelines. Belgium could benefit from a shared command entity to streamline and exchange anti-corruption efforts at the local, national and international levels (European Commission, 2024a). Although several initiatives, such as *Stroomplan* 2.0 ([99]), the European ports alliance ([100]), the Security Think Tank ([101]), the Security Steering Committee ([102]), the local maritime security committees ([103]), the EU network against corruption ([104]), the Europol Platform for Experts ([105]) or the Poseidon project, have been launched to improve information sharing, these efforts remain fragmented due to inconsistent participation from the involved actors. A systematic evaluation could ensure that new network initiatives are monitored and adjusted as needed.

## 5. Closing the gaps: concluding discussion

With the increasing size and throughput of the Port of Antwerp-Bruges, physical and technological security measures have been strengthened to address organised drug crime. To maintain access and control over logistics chains, OCGs increasingly rely on corruption. Although Belgian and European frameworks strongly focus on organised drug crime, they risk overlooking the specific dynamics and impact of corruption. Corruption is not merely an enabler of organised crime, but a criminal phenomenon embedded within it. Addressing this requires more than traditional law enforcement tools. A sustainable anti-corruption strategy should therefore ensure clear roles, political support, evidence-based decision-making, a long-term focus and the flexibility to respond to emerging threats. However, the current developments remain too focused on visible deterrence, such as screenings, port bans or the deployment of a port security corps, creating an overly securitised port environment. Likewise, technological solutions such as CPu and a central security control room offer potential but are prone to manipulation if not embedded in a broader framework of cybersecurity, integrity policies, staff training and organisational change. Otherwise, they risk being symbolic, shifting rather than addressing corruption vulnerabilities. Yet, the real challenge lies not only in recognising the need for change, but in ensuring that these efforts are structurally implemented, monitored and enforced. Belgium's advocacy for expanding the ISPS Code could serve as a catalyst for sharing evidence-based security measures across all ports, ensuring their regular evaluation, structural funding and preventing the shifting of illicit activities. While private port actors bear responsibility for implementing security measures and balancing them with

([99]) The evaluation of the *Stroomplan* resulted in *Stroomplan* 2.0, emphasising (international) cooperation and increased resources for public services (Openbaar Ministerie, 2022).

([100]) The European ports alliance is an EU initiative to enhance port security against drug trafficking and organised crime. It fosters a public–private partnership among EU agencies and Member States to safeguard logistics, information and staff in seaports.

([101]) The Security Think Tank, established in 2005 by the Port of Antwerp-Bruges, fosters collaboration between public and private actors to build a resilient network for port security (communication with Antwerp-Bruges Port Authority).

([102]) The Security Steering Committee of the ports of Antwerp, Hamburg and Rotterdam exchanges strategic information to enhance port security. This collaboration focuses on the implementation of the ISPS Code and container security (Europol, 2023b).

([103]) The local maritime security committees are supported by the National Maritime Security Authority and oversee collaboration among customs, law enforcement and defence agencies, and intelligence services, port authorities and external partners (Team Justitie, 2024).

([104]) The EU Network against Corruption, established in 2023, serves as a platform for EU Member States, national authorities, civil society, international organisations and EU agencies to collaborate, share best practices, identify trends and improve coherence in anti-corruption efforts (European Commission, 2024a).

([105]) The Europol Platform for Experts is a collaborative web platform for specialists in a variety of law enforcement areas (Europol, 2023a).

economic competitiveness, their engagement requires meaningful involvement, transparency and access to information. A more positive public perception of the port depends on their inclusion and support. Moving forward, multidisciplinary collaboration should make information sharing the norm, not merely by joining networks, but through active contribution and organisational readiness to act on shared insights. This depends not only on the ability but also the willingness of each actor to engage in meaningful change. The National Drugs Agency could provide the necessary operational and strategic coordination to mobilise both public and private stakeholders and streamline responsibilities.

Finally, as Europe moves towards a unified anti-corruption framework, Belgium must align its Criminal Code and port security policies with international standards while retaining flexibility to adapt to evolving criminal tactics. This requires critical reflection on the roles and responsibilities of all actors involved. A streamlined division of tasks and improved coordination are needed to avoid fragmentation and ensure recourses are used strategically rather than claimed reactively. Encouragingly, drug seizures in the port have recently declined. This may be seen both as a sign of progress and a reminder of the persistent vigilance required. However, without reliable, evidence-based data, and under public pressure for swift action, it remains difficult to assess whether existing measures lead to progress or shift the problem elsewhere, leaving both public and private actors uncertain about their effectiveness and responsibilities.

Overall, the Port of Antwerp-Bruges has made progress in implementing anti-corruption measures, yet gaps remain. Since 2019, growing political commitment and public scrutiny have encouraged multidisciplinary collaboration. However, unclear responsibilities among many partners continue to hinder the implementation of anti-corruption policies, resulting in *ad hoc* initiatives. Short-term, highly visible deterrent actions often take precedence over a long-term approach. This focus on visible outcomes enhances political legitimacy but does not necessarily strengthen resilience against corruption. Pursuing the total elimination of corruption is likely overambitious and may undermine organisational efficiency. These challenges highlight the need to prioritise anti-corruption efforts, clarify responsibilities and adopt a flexible, long-term strategy to prevent fragmented initiatives and integrity fatigue.

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**Annex 14.1.** List of interviewees

| | |
|---|---|
| Interviewees (organisations) | Customs (1)<br>Judicial authorities (7)<br>Law enforcement (2)<br>Government agencies (2)<br>Labour unions (2)<br>Port authorities (4)<br>Port companies (5) |