



Image: Geoff Livingston

Commentary based on discussions

**Wildlife crime and international security:  
strengthening law enforcement**

Monday 26 – Wednesday 28 October 2015 | WP1423



Wilton Park

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## **Wildlife crime and international security: strengthening law enforcement**

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Worth around £6 billion per year, wildlife crime is no longer limited to conservation within source countries, but has become an acute threat to national and transnational security. Like other forms of illicit trade, wildlife trafficking undermines security across nations. Well-armed, well-equipped, and well-organised networks of criminals and corrupt officials exploit porous borders and weak institutions to profit from the illegal trading of wildlife. It poses a threat not only to the existence of a number of species but to vulnerable communities and institutions, driving corruption and undermining rule of law and efforts to reduce poverty in source and transit countries. A more robust approach to law enforcement to combat wildlife crime and other related crimes is needed. Building on international efforts including with the G-7, OECD, APEC, and other multilateral fora, and building upon the recommendations for action from the London Declaration and Kasane Statement and looking ahead to the Vietnam Conference, this event focused on coordinated action across borders in wildlife crime through strengthening law enforcement and legal deterrents.

This event uniquely convened stakeholders from the inter-governmental, law enforcement, non-governmental, and private sector communities as well as from key source, transit and destination countries. In the process, this helped to link together traditional wildlife authorities, with law enforcement, financial anti-crime units, intelligence, and conservation communities. It represented an opportunity to advance the leadership and collaboration of the United Kingdom and United States of America, the OECD Task Force on Charting Illicit Trade, and other partners to build upon other international dialogues to identify pathways to tackle the current dynamics of wildlife crime which serves as a low risk, high profit activity for transnational organised criminal enterprises. The event aimed to:

- Analyse effective responses to combat wildlife crime, looking in depth at law enforcement approaches and opportunities to operationalise commitments from the London and Kasane conferences;
- Harness ideas with regard to the implementation and, critically, the coordination of action plans to produce recommendations for action against wildlife crime;
- Examine the medium and long-term policy implications of wildlife crime for



source, transit, and destination countries and the international community as regards transnational organised crime, conflict and terrorism;

- Build on the work of international organisations (eg the International Consortium on Combatting Wildlife Crime (ICWC) and United Nations Office on Drugs and Crime (UNODC)) to increase long-term capacity among national, regional and international wildlife law enforcement agencies through establishing new partnerships for action.

## Key points

- To prioritise and treat wildlife trafficking as a serious crime, all countries should consider criminalising it, improving the certainty of conviction and appropriateness of punishment. Additionally, the risk of detection to traffickers and the certainty of punishment should be increased. This can partly be achieved by better coordination of security at ports, airports and borders by industry, customs and law enforcement.
- Information sharing and data collection can be improved at all levels, with more standardised collection of data and further cooperation in terms of sharing data being key.
- Law enforcement needs tools to do their job well. Law enforcement could be strengthened by building capacity in terms of data sharing, technology, staff and resources. There is also a need for the professionalisation of police. Wildlife trafficking is closely linked to money laundering, corruption, organised crime and other illicit markets. Bodies tackling these activities may be able to provide other tools to help combat wildlife crime and give examples of best practice/success. The use of financial tools to help law enforcement investigations on wildlife crime is needed.
- Though there are numerous collaborative initiatives taking place, further efforts could be made to include private sector actors, local NGOs and representatives from a wider range of developing countries as well as to improve communication and coordination to avoid duplication.
- There have been very high level political commitments made by government officials, celebrities and other stakeholders to galvanise global attention, we are at a critical point in time of action and follow-through of the political commitments.

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## Wildlife trafficking’s significance

1. Wildlife trafficking matters greatly as it is an environmental catastrophe. It is the crisis of our lifetime in terms of wildlife conservation. For some countries, this is a national disaster that deserves much more serious attention. It leaves multiple victims in its wake and is an imminent chronic threat to wildlife. The continuing poaching and trafficking crisis threatens the irreversible extinction of numerous species in the oceans and on land.
2. The illicit trafficking of wildlife also contributes to social, economic, health and political insecurity. These social impacts are large and widespread affecting the livelihoods of people living with wildlife, which is an integral dynamic. Ongoing poaching and trafficking not only undermine the confidence of local communities; it challenges the rule of law. This impacts upon national security as does the connections to organised crime. Additionally, wildlife trafficking is globally pervasive with an enormous range of profiteering; thus the widespread nature of the impacts.
3. Corruption can exist at all levels of governance systems. Corruption is a key driver and both fuels and is fuelled by wildlife trafficking. Engaging anti-corruption or vetted units

to combat wildlife crime can assist in reducing the scope for trafficking.

4. The environmental, social and economic implications of wildlife trafficking undermine the priorities set by the United Nations Sustainable Development Goals, in particular target 15.7 to 'take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products'.
5. Wildlife trade is a huge part of the global economy and there is the sense that the trafficking of wildlife is a high profit low risk crime. Yet, on account of its impact it should be considered and prosecuted as a serious crime which faces serious consequences. The failure to stop these criminal networks increases the likelihood of extinction and will likely expand to other species where there is profitability. Wildlife trafficking competes for limited resources and attention with other crimes and remains a low priority.
6. It is possible that the low priority given to wildlife trafficking by government officials is tied to the fact that many people do not realise the true cost and global harms of this illicit trade and/or that extinction is not a pressing concern in some parts of the world.

### **Information sharing and data collection**

7. Overall, all stakeholders could adopt greater transparency and work towards a 'culture of openness' where sharing is the rule and withholding information is the exception. It can sometimes be difficult to convince law enforcement and intelligence communities to work together and share reliable, timely, quality data. Openness also refers to the public having access and public support to raise the profile of wildlife trafficking in the global agenda.
8. Civil society organisations (CSOs) can also struggle with openness particularly in regard to a culture of competition around donor money. More communication though will help to avoid duplicate efforts, which is currently a common problem and waste of resources. For instance there are several ongoing yet separate projects analysing criminal networks.
9. When information is shared, a lack of response or feedback de-incentivises further sharing and collaboration.

What data is available?

10. There are numerous existing sources of information such as the data from the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), INTERPOL and the World Customs Organisation (WCO) and NGOs. The specific information collected could be improved, professionalised for the use of law enforcement, consistently standardised and widely shared. There are also the IUCN Red Lists as well as ETIS, MIKE and an ongoing elephant census. The United Nations Office on Drugs and Crime is in the process of producing a wildlife trafficking report similar to their annual World Drug Report. CSOs are also a significant source of information though they are not able to capture everything. The OECD 2015 report on Illicit Trade, Converging Criminal Networks offers a full overview chapter on Wildlife trafficking trends in sub-Saharan Africa.
11. Though more accurate species population data is needed in some cases, often this information is a fairly accurate measurement and could be used more as a barometer of success.
12. Governments should provide guidelines as to what data needs to be collected and make it a requirement of stakeholders. This should not only consist of seizures and arrests made, but also species population data.

The intelligence collected and shared

13. The law enforcement and intelligence community is collecting limited information about wildlife trafficking. Part of the problem is knowing if the knowledge gained is just

“Overall, all stakeholders could adopt greater transparency and work more towards a 'culture of openness' where sharing is the rule and withholding information is the exception”

information or if it is actionable intelligence. This leads to challenges in how it is shared or if it is deemed to be too sensitive.

14. When there is information that can be shared, there is a need for improved communication channels between law enforcement, CSOs and industry. There are lessons learned about information sharing from other illicit trade. Law enforcement must be proactive about sharing contacts and information with industry and CSOs.
15. When information cannot be shared for reasons of operational sensitivity, there is the challenge of creating secure communication systems, including time needed to create such structures. For instance, such an initiative at Europol took ten years to put in place.

#### Forensic data

16. In addition to information and intelligence, forensic capability and information should also be shared. In many parts of the world, basic forensic capacity may be limited. There are examples of collaborations, such as the group of scientists involved in the Wildlife Forensic Network whose aim is to address this through the sharing of forensic resources and expertise. Other ongoing efforts to support investigations through information sharing include the German laboratory that is trying to make isotope ivory data Open Source and the current survey to determine the capability and capacity of different forensic laboratories around the world and the University of Washington's Center for Biology in the United States that is taking DNA samples of major ivory seizures and identifying key hot spots for poaching.

#### Information to and from media

17. Once the media commits to a story or coverage about wildlife trafficking, efforts need to be made to change words into actions.
18. Media channels/outlets are key to changing national dialogues as they can put pressure on governments and courts and hold them to account. In Kenya, media coverage was integral to changing the law and policy, which has improved law enforcement performance. They maximised publicity on the lack of accountability and punishment of offenders.
19. Efforts to curb wildlife trafficking need to engage with social media as well.

#### Future possibilities

20. As indicated, there are numerous sources of data. This can be burdensome on law enforcement to repeatedly give similar information in slightly different ways. Is there a possibility to standardise the information requested from organisations like the UN, CITES, the European Union and the WCO? Could they collaborate to have one shared reporting mechanism?
21. Can data mining tools be put to use to provide real time information from open sources?
22. Clearly no one wants to compromise cases. However, is there a possibility to develop case studies of finished cases to share information, lessons learned and best practice?
23. Can research support better understanding of offender motivations that can be shared? Can typologies be created and data generated on wildlife supply chains?

### **Strengthening law enforcement**

24. As part of the multi-faceted approach required to tackle wildlife trafficking (strengthening law enforcement, reducing demand, building international cooperation, and engaging communities) this meeting focused on the critical element of strengthening law enforcement.

"Media channels/outlets are key to changing national dialogues as they can put pressure on governments and courts and hold them to account"

## Building capacity

25. Sharing of data in this context involves the technical capacity to produce and share real time information, in relation to crucial choke points, suspects and offenders. For instance, criminal registers at national and international levels that could be accessed by law enforcement would support investigations. Increased capacity to collect and share national statistics on wildlife trafficking would also aid law enforcement. Additional benefit would stem from creation of case studies of scenarios, which could then be shared.
26. Capacity also needs to be improved in agencies other than the police, such as defence lawyers, prosecutors and judges. In relation to wildlife trafficking, prosecutors and defence lawyers have limited experience due to the infrequency with which cases arise; they need special training and advisors to assist with wildlife cases. This could happen through local, regional and international coordination of specialised prosecution that would be supported by interagency collaboration. [Eurojust](#) may provide lessons as to how this could be structured.
27. The capacity to investigate the financial aspects of wildlife trafficking cases also needs to be improved. The ability to track illicit trade and financial flows can be particularly challenging, as it is not possible in all countries.
28. Law enforcement also needs support in building the capacity to acquire and use new technology. This needs to include life cycle support of the technology. Some criminals have access to better and more modern forms of technology than law enforcement. For instance in some cases, even basic equipment such as mobile phones would improve law enforcement capacity. In others, there is the opportunity for more sophisticated measures, such as the X-ray monitoring of shipping containers in Dubai. Technology that would enable controlled deliveries would also improve the capacity of investigations, though the benefits and risks must be evaluated.
29. Better technology must also include the capacity of forensics and evidence collection, such as DNA coding capability and sniffer dogs. Staffing needs to be trained on the chain of evidence. There also needs to be robust knowledge around what can be seized in addition to the physical capacity to securely store seizures and evidence, which may be live wildlife.
30. There should be more financial resources, law enforcement and park rangers dedicated to wildlife trafficking. There are so few rangers now that in some areas police are re-deployed to help National Parks, but this leaves other gaps in patrol and coverage. In some instances, the military are also helping. More staff will help convince communities that law enforcement can be effective and will encourage greater support from locals. Existing staff such as park rangers are poorly paid, ill-equipped, basically trained and inexperienced. They need more skills-based knowledge as well as new tactics that are not so predictable or known. This would include understanding of search and seizure, of the motivations and drivers of the different actors and that pressure points will differ for different offenders. Also, law enforcement would be strengthened by the ability to link wildlife trafficking to other serious offences, such as narcotics trafficking. Overall, law enforcement are outmanned and outgunned by criminals, which is dangerous and costly for them and their families. Park rangers and others on the ground need analysts to assist them.
31. Law enforcement capacity could also be increased by establishing national wildlife crime units with standard operating procedures, but, in general, law enforcement protocols for investigations would also be valuable. Additionally, rangers and others should help create and teach rules of engagement. Procedures and protocols could include Memorandums of Understanding (MoUs) between countries and/or agencies to ensure collaboration. This may help to establish trust between countries and agencies and increase the likelihood they will ask for help.
32. A whistle blower platform, such as [Crimestoppers](#), could also act to increase the

capacity of the public to share information with law enforcement.

#### Increasing risk of detection, prosecution, and conviction

33. Wildlife trafficking is not considered a crime in all affected countries and is not treated as priority serious crime, as defined by the UN Convention against Transnational Organised Crime. By making it a criminal offence, cases would be handled as 'serious crimes' which would increase its priority and the focus of law enforcement. The lack of detection emboldens small poachers, as do legal loopholes, such as those that exist in regards to domestic ivory.
34. There should be further exploration of how to increase the risks and deterrents from wildlife trafficking. This could be through criminalisation, but also ensuring CITES is enforced, increasing penalties, and sanctions or more innovative strategies, such as using parallel criminal legislation in addition to wildlife laws.
35. In many places, there is little risk of poachers and traffickers being held to account. Particularly, there is a lack of movement from arrest onwards, so there are even fewer prosecutions. Those who are arrested are the frontline and not the bosses or kingpins. Ideally, there needs to be arrests at all levels. Additionally, it is not just severity of punishment that will deter traffickers, but the certainty of punishment. This would be particularly effective in regards to consumers. Yet, the courts do not necessarily uphold laws that are enacted. In Kenya, for example, fewer than 10 per cent of arrests go to trial. Seventy per cent of files are lost. The convictions of this small number of people are high, but most are given fines of no more than \$400. There are no confiscations and all people convicted are poachers; there were no traffickers. When rangers were implicated, those cases were not brought forward. After the recent change in Kenya's law, there was an increased number of arrests and better record keeping. Due to the chance of a higher sentence, offenders no longer plead guilty, but take their chances with going to trial. The side effect of this is longer cases, which require more resources. Part of this came as a result of the Eyes in the Courtroom project. In one case in Kenya where the defendant was thought to be untouchable, the media and an NGO attended the trial and followed the proceedings. With such scrutiny, he was found guilty even though evidence, such as nine vehicles, went missing.
36. The risk for traffickers needs to be more than just seizure of contraband wildlife. This response comes too late in the timeline, and other measures of law enforcement success need to be found in part to create other points of risk.

#### Security at ports, airports and borders

37. Industry needs to be in compliance; currently some companies only carry out basic reporting and information-sharing regarding suspicious activity. Ideally, champions in industry would be enlisted to help with this. Companies should make formal statements that they have a zero tolerance policy on participating in and/or colluding with trafficking; and take action to hold employees accountable, for example through dismissal. Industry could implement mandatory training for their employees about wildlife trafficking and how to conduct investigations. Information sharing between industries should also be linked.
38. Customers need to be informed of companies' policies around wildlife trafficking so they have the choice to support only those companies who are acting responsibly.
39. Further improvement of communications can come from better ties between industry and customs; the latter can also assist industry with risk profiling. Good reputations by companies could speed up inspections; possibly, this could be taken advantage of to change the attitude of industry. Improvements could also come from standardised guidelines and the more regular use of suspicious activity reports to customs and law enforcement. There are challenges around determining the jurisdiction of transnational smuggling and which agency, company or country should lead. This could be determined by which country has the best legal foundation to take a case forward. For

moving vessels, there is the risk that wildlife is very low priority and legislation/enforcement is weak in the country of seizure, but closer industry and customs links could help to address this.

40. Additionally, known routes and links should be shared with the Transportation Taskforce of the Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry.
41. There are four drivers for industry engagement: 1. Marketing (voluntary compliance, see the issue as pro-wildlife). 2. Public (amplify through social media, news – can apply pressure/give support to governments and organisations). 3. Regulation (sustainable shipping initiative – routes partnership). 4. Clients (who are they and can they apply pressure on companies).

## **Insights from and links to other crimes**

### **Corruption**

42. Corruption is a key facilitator of wildlife trafficking. There are also issues with the large scale of corruption, the amount of impunity and with tackling temptation and greed. Even though there are anti-corruption tools, they are not used that often. Though it is a problem in many areas, corruption should not stop efforts to support preventing wildlife trafficking.
43. Corruption is endemic in most places and examples are needed of how this can change. This cultural and normalised aspect in some areas is incredibly difficult. Corruption is also inextricably linked with socio-economic issues like poverty, which are also incredibly difficult to address. Furthermore, there are instances where the corruption is at the highest level. How to subvert a corrupt system is a significant challenge. There is the possibility to fund an outside political opponent, where an anti-corruption platform can be an advantage. To impact corruption in government there also needs to be the heavy regulation of governments.
44. Corruption can be prevalent in many areas and levels of government. In fact, government officials are also likely to be involved in wildlife trafficking. Ways to combat this might be to have lifestyle audits, better vetting processes, ethics training, and public sector anticorruption strategies to encourage the transition from poachers to rangers and/or to address staff morale. The latter might improve the lack of understanding of rangers of the value of what they are protecting. Individuals who are compromised must be removed. Further challenges arise if corruption arises at the interface with the financial system, which helps to recycle the profits from undue activity.
45. There needs to be independent watchdogs and methods of monitoring to tackle corruption. Other ways to combat it are through pressure (donors, intra- and inter-agency collaboration in which agencies act like watchdogs of each other), awareness raising (of the public that corruption exists and its impacts), education, transparency, leadership – visible anti-corruption bodies, zero tolerance, better governance – and strengthen laws and enforcement.
46. International standards around corruption are lacking. Unlike for example, anti-money laundering, where there is an accepted global standard. This is achieved through the Financial Action Taskforce (FATF) through the OECD and a lot can be accomplished because of this supportive infrastructure.

### **Money laundering and organised crime**

47. Combating money laundering and organised crime are both mature fields with lessons to offer and tools to use. In using lessons learnt from financial crimes and the industry to tackle wildlife trafficking there are issues around developing useful typologies and the content of financial regulations. The Kasane conference focused more on what law enforcement could do better in regards to money laundering and financial crimes. As

the latter is a predicate offence it ensures that prosecutors, investigators and judges have the finances, resources and knowledge to combat illicit trade. FATF is a partner, which has helped to prioritise and raise the profile of wildlife trafficking.

48. Money laundering is a factor within wildlife trafficking as illicit financial flows move within businesses and trade. This is hard to prove though as is tracking finances where only cash is still used. In some instances, there are so much data it is difficult to know what is useful and what should be prioritised. There are systems of national reporting of money laundering, but they are always problematic and reporting compliance remains poor.
49. If industry, particularly banking sectors, does not comply and have poor practices related to money laundering and organised crime, this should be made widely known so the public have the option not to work with them. The practices that should be in place are engagement in criminal activity can lead to sanctions, such as travel restrictions and access to financing.
50. Technology assistance for money laundering and corruption are widely available. Additionally, it would be beneficial to train financial investigators as to how to access bank accounts, investigate financial crimes and seek mutual assistance. If organised crime is suspected, there are even other tools available. Furthermore, ratifying and implementing legislation related to The UN Convention on Transnational Organised Crime will aid in combatting organised crime and money laundering and thus wildlife trafficking. Organised crime is known to be connected to other illicit trades, but it should be noted not all wildlife trafficking is a poly-crime or organised.
51. The aim of using money laundering as the tool to combat wildlife trafficking should be clear. Is it to defund traffickers? To make wildlife trafficking less attractive? To shutdown trafficking networks? To push their money out of banks? Colombia, for instance, has strict anti-money laundering initiatives but it remains a problem.

#### Other illicit trades

52. There is believed to be a connection between wildlife trafficking and other trades, but the data are still embryonic. For instance, it is suspected that highly lucrative human trafficking networks are linked to wildlife traffickers and use the same sophisticated techniques, smuggling routes, and measures to operate in both black markets.
53. Similarly, it is thought that smuggling tactics are the same across contraband and that similar incentives, economic behaviours, attitudes and motivations drive all illicit trafficking networks. It would be beneficial to recognise the convergence of networks in terms of routes and to uncover platforms that are least risky as those will be the markets that transnational organised crime might move towards. Wildlife trafficking is connected to the extraction and possibly smuggling of other natural resources. For instance, wildlife will be taken during deforestation for mining and timber harvesting.
54. Wildlife trafficking is linked to narcotics, human, and arms trafficking, as they are needed to execute this crime.
55. Changing the demand has proven to be ineffective in drugs, but there are lessons to be learned from counter-narcotics efforts in Afghanistan. Removing kingpins in drugs hasn't always been effective. However, the certainty of punishment of drug users has presumably had an impact on consumption.
56. Wildlife differs from other illicit trades through its urgency and that the end game is extinction. Yet it remains a challenge to get traction to be taken and treated as seriously as illicit trade in arms and drugs.

#### Terrorism, militant and insurgent groups

57. Whilst linking wildlife trafficking to terrorism and insurgency may be a good political move to raise its profile, it overstates the severity and impact of the connection, such as

with al-Shabaab.

## Collaboration and initiatives

### Country initiatives

58. UK - United for Wildlife and the International Sustainability Unit (a charity of HRH Prince Charles) work to combat climate change, deforestation and wildlife trafficking. The UK Government's engagement began when HRH Prince Charles was asked for help by African presidents during the beginning of the elephant crisis. This led to the London Conference and the endorsement of the London Declaration and to Botswana hosting the Kasane Conference in 2015. These events encouraged and sought collaboration with CSOs, banks (though more need to become involved), law enforcement and independent experts to tackle the problem. The UK Government has committed £13 million to support projects around the world primarily through the Illegal Wildlife Trade Challenge Fund.
59. US - The President has called for greater action, releasing a US National Strategy and Implementation Plan for Combating Wildlife Trafficking and establishing a Task Force dedicated to wildlife trafficking. The US FWS conducts investigative training to support efforts to build regional capacity to enhance security and strengthen law enforcement. The US FWS now has attachés in several US embassies around the world to support efforts to stop wildlife trafficking. The United States Agency for International Development (USAID) is also in the process of producing a global report about wildlife trafficking and working with NGOs and industry to review the transportation sector to end wildlife trafficking.

### Intra-governmental organisation initiatives

60. The OECD Task Force on Charting Illicit Trade co-ordinates international expertise on various aspects of IWT, such as mapping existing data and evidence, which will then be shared. They support dialogue between the various stakeholders and offer guidance to support both public and private action. Again, FATF is also supported through the OECD.
61. ICCWC - The five partners (CITES, INTERPOL, UNODC, the World Bank and the WCO) provide a platform for more coordinated efforts to tackle wildlife trafficking, provide crucial services, support the use of UNODC's Wildlife and Forest Crime Analytic Toolkit in nearly 15 countries, have created a national assessment guide, support efforts to identify timber, conduct specialised training and special investigations, assist with further scaled up response to incidents and ensure capacity building in terms of equipment.
62. In addition to being a member of ICCWC, UNODC is developing a World Wildlife Crime report, similar to the World Drug Report. At meetings, they hold side events on money laundering and corruption in collaboration with the FATF.
63. INTERPOL provides secure, global communications through member countries' National Central Bureaus. They focus on 18 criminal areas through the Environmental Security Sub-directorate (ESS). This sub-directorate is part of the Organised and Emerging Crimes area. The initiatives they undertake are driven by the member countries and donors. INTERPOL also provides targeted support including training and intelligence analysis. There is now Global Complex for Innovation based in Singapore in addition to the Headquarters in Lyon to reflect the transnational nature of crime. The ESS runs projects such as Project Wisdom that is focused on elephants and rhinos. This project aims to collaborate and cooperate with countries trying to stop poaching and streamline communications between these stakeholders.

### Private sector

64. Collaboration with the private sector needs to be improved and incentives should be

developed to do so. This may be related to the stigma or damage to a business's reputation if it is shown to be complicit in wildlife trafficking. Additionally, appeals that they will save money and minimise risk, may also make companies cooperate. If awareness can be raised and industry can be given the tools to support detection and due diligence, they may be more likely to participate. Additionally, the harmonisation of legal instruments may make it easier for them to comply and share information and technology. They should be encouraged to get rid of complicit staff. Furthermore, people may come to work for companies with an ethical stance on this issue.

#### Banking sector

65. The banking sector can play a key role in uncovering money laundering and following the illicit profits.
66. Large international banks have in place end-to-end risk management. Globally, policy has set very high levels for compliance and regulation of banks. Wildlife trafficking can be covered in this end-to-end risk management.
67. Local jurisdictions should also make money laundering and financial crimes (tax evasion, terrorist financing, bribery and corruption) a predicate offence to prevent the abuse of processes by customers.
68. There are also security units (Financial Intelligence Units (FIUs)) in place to help prevent fraud and cybercrime. There are legal, criminal and reputational risks to supporting certain organisations or individuals. There can also be personal risk of not holding individuals to account. FIUs have advanced knowledge of investigation processes and customer risk management. However, they are not standardised or consistent and are weaker than law enforcement.
69. There is robust governance related to this risk management, but there needs to be the infrastructure to support the compliance. There are three levels – business, compliance and auditing. There is inherent risk in the sector, but with systems and controls in place this can alleviate some of the risk - transaction monitoring, customer scrutiny, payment screening – data and metric on these could be improved.
70. A blended methodology of assessing the risk of individuals and corporations should be employed. Efforts can be made to enhance due diligence as well as monitoring transactions. These can be assisted by changing the frequency of renewals of products or other trigger events attached to negative alerts.
71. Policies exist on what to do with suspicious customers. More information from banks to law enforcement about suspicious activity reporting will help. Clearly ongoing cases cannot be shared, but open source information about suspicious activity will support screening and profiling and trigger alerts. However, banks are not, and should not be considered as, investigators.
72. The challenges are the volume/scale, diversity and number of products and services. Additionally, there are fragmented cross-border transactions, shell companies, the blur of legal and illegal companies, dormant accounts and the use of cash. When suspicious activity reports are used, receiving feedback afterwards would motivate staff to continue. Internally, there are also issues with information sharing as there are constraints around money laundering data and data protection related concerns. For instance, suspicious activity reports cannot be shared.
73. There are also other players in the financial industry– domestic (small) banks, money service businesses, hawala, bitcoin and digital currencies, cash – it is not a level playing field, ie non-compliance in places like Somalia. There has been a displacement from highly regulated banks to these other providers.
74. Misconceptions – there is not a single database of customers and non-face-to-face banking is enormous in volume and not all high risk. There is also lack of capacity in non-western countries to investigate financial crimes or put into place the required

screening.

#### Transportation industry

75. There is also an important part to be played by the transportation industry and there are several initiatives like USAID's ROUTES program and an International Taskforce on Transportation that are trying to bring about more collaboration.
76. The challenges are the huge volume of global trade (8.4 billion tonnes of sea cargo), how to facilitate efficient transport while more closely scrutinising it, and the nature of the supply chain – complex, leading to multiple stakeholders being drawn in unwittingly. Also, there is a lack of awareness at both macro level of industry and micro level of employees. There are inadequate legal provisions to enable cooperation with industry, so governments and CSOs do not necessarily share information with them. Shippers can abide by the Sage framework from WCO, but do not implement.
77. Industry leaders do not always have the political will to engage with issues. The pressure of trade associations may help, as will robust policies to make industry compliant and want to cooperate with law enforcement. This can be done as we see from recent initiatives at Emirates Airlines.
78. There needs to be strategic dialogue, collaboration with law enforcement on a single message, increase of risk of detection and prosecution of trafficking, implementation of targeted prevention and due diligence mechanisms and a change in attitudes.

#### Shipping industry

79. Industry will improve their profit margins and efficiency if the “gray market” and illegal trade at sea can be combated. This is true for courier services and individual products too, where tracking solutions would be useful.
80. For example, initiatives like [Project Eyes on the Sea](#) would reduce crime and loss for industry. The project uses Catapult Satellite Application. This is a consortium of academic, government and private companies with 1000 satellites and nano-satellites. The constellation of satellites can then track shipping containers and products. Illegal, Unreported and Unregulated (IUU) fishing has been the focus as one fifth of fishing is possibly IUU. There are multiple data sources that can be triangulated to provide information and intelligence. Transshipment of sea vessels coming together can be monitored and investigated if it means illegal activity. The technology can detect dark and rogue vessels as well as demonstrate compliance.

#### Internet companies

81. eCommerce is challenging due to its volume and many potential legal issues have arisen concerning the sharing of information. It does facilitate trade, so there is a need to put in place MoUs with companies (like eBay) to collaborate, guidelines for due diligence and checking of profiles, and training on how to investigate suspicious and illegal activity. Part of the collaboration should be to develop information-sharing protocols with police as well as bilateral agreements between countries regarding ecommerce.

#### Insurance industry

82. The insurance industry should be included. They can help with cases involving ships, containers and product shipments in terms of impounding and possibly seizures. Insurance can be used as an investigative tool as items that are insured tend to have real values declared.

#### Pressure on supply chains that inadvertently support killing

83. Mining companies and pesticide companies that produce chemicals, which are used to poison water to kill elephants and other wildlife, should be contacted. Strategies need

to be put in place to encourage collaboration and prevent the use of these chemicals as a way to kill animals. The same is true of weapons manufacturers in Europe who are supplying poachers with equipment.

### Challenges

84. There needs to be global, collective action across borders involving untraditional partners, such as industry, banks, transport sector, media, and academia. Then best practice and lessons learned could be shared and tangible goals drafted together in order to prevent scattered initiatives and duplicated efforts.
85. There should be incentives and censure to countries not performing, which could possibly be through the Standing Committee of CITES employing the CITES enforcement indicators as a guide.

## Going forward

### Events

86. High profile events like the London and Kasane Conferences help to raise the profile of wildlife trafficking and gain political support. Additionally, they keep stakeholders from becoming complacent and encouraging them to act and find solutions. The next follow-on to the London and Kasane conferences will take place in Hanoi in 2016 to build upon political commitments made. It is important to give people hope that something can be done and the public should somehow be included in the event, noting that the CITES Conference of the Parties will be held beforehand and should feed into one other.

### Hope

87. Though the situation is still dire, there is still cause for hope. For example, commercial trade in ivory is ending in the US and China and there are many countries that have destroyed seized ivory stockpiles.
88. There are several key UN resolutions relating to wildlife trafficking, most recently the UN General Assembly resolution in addition to its inclusion in the UN Sustainable Development Goals. The idea has been raised to have a special IWT envoy to the UN.
89. Success is possible as has been seen in Nepal with the recovery of the Tibetan antelope and in Kenya where major changes to legislation have been achieved.
90. There is more data available than ever before and more experts who understand what we are up against. Also, wildlife trafficking is recognised as more of a political priority than ever before and garnering high level political attention.
91. There is now a Wildlife Justice Commission in The Hague where cases will be heard that were insufficiently investigated.

### Possible outcomes

92. There was movement to contact the BBC regarding wildlife programming in Africa.
93. There is a CITES legislative project that is making recommendations on how to amend criteria of CITES compliance. For instance, Thailand is Category 1 meaning it has implemented fully CITES legislation. Yet, it still has domestic ivory trade and acts as a transit point for smuggling. Right now wildlife trafficking does not necessarily need to be made a crime; it could be classified as an administrative or civil violation. Some participants agreed to continue pushing this initiative.
94. ICCWC, through UNODC is developing law enforcement indicators that will assist international donors.
95. Some NGOs are working to reduce duplication (i.e. Crimestoppers and whistle blowers) and share information on analysis to support law enforcement more effectively. This

may possibly mean a central depository through the UK National Wildlife Crime Unit. There was talk of holding workshops with NGOs and analysts about information collection, risk management and sharing. Also there may be scope for NGOs to organise training for the transport industry.

## Conclusion

96. International fora continue to make wildlife crime a high-level area of focused attention and action. Working together, through robust diplomacy will mobilise global support for, and encourage partners to actively participate in, the fight against wildlife trafficking. The goal now is to strengthen implementation of international agreements and arrangements that protect wildlife through partnerships with governments, intergovernmental organisations, CSOs, local communities, and the private sector to develop and implement innovative and effective approaches to combating wildlife trafficking and related corruption and illicit threats.
97. At the London Conference there were calls to criminalise wildlife trafficking. At Kasane there were further calls to enhance law enforcement capacity at national, regional and international levels. Vietnam will be the chance to measure these calls. It was suggested that future events could perhaps consider first pretending participants are a criminal network and second developing interventions based upon the criminal operations proposed.
98. With the global momentum and calibre of people involved, the potential is outstanding to coalesce into action. Yet there remain challenges to be overcome.

## Setting priorities

99. There is a question as to how to prioritise action to address this policy concern, as there are only a few major international donors and private funders, upon which many other organisations rely for funding. There needs to be a review of gaps and overlaps in the number of initiatives on this issue, but this is in part hampered by the limited donors and the high competition across recipients.

## Enforcement and regulation challenges

100. Wildlife trafficking is not currently a priority among law enforcement, but if considered a crime like others, this opens up a toolbox to leverage financial and corruption instruments. Law enforcement needs to have a forum with transport and private security at customs and borders to improve success at ports and borders, but communication is still a challenge. Additionally, law enforcement cannot educate consumers or improve livelihoods, so they need to collaborate across sectors. Standardisation in procedures and data collection would be helpful and welcoming, including for captive breeding and domestic markets, yet there needs to be flexibility and locality adjustments.

## Social challenges

101. To some extent wildlife trafficking is a consequence of success in improving livelihoods: as wealth increases, so does the demand for illegal wildlife products. This needs to be combatted with concepts of stewardship and by capturing the enthusiasm and idealism of caring for wildlife - to advocate protecting world heritage and identity rather than always focusing on the instrumentalised reduction to economic arguments. Efforts need to prevent communities from being exploited and intimidated by traffickers.

## Political challenges

102. Though it is improving, there is still more duplication of commitments already made rather than action, and often not the right people in the room. Where for instance are the economists, and stakeholders from Latin America? Conversation and collaboration cannot be limited to the international community and a few developing countries; there

also needs to be more private sector engagement along with more local CSOs.

103. Leadership needs to prioritise the issue through putting resources where commitments have been made, in order to address the gap between political will and the work on the ground. There is a continual reference to prioritising, but it is rarely actioned and it is unlikely when considering other forms of crimes. With that said, there needs to be a balance of pragmatism and idealism. Perhaps efforts should be put towards a few quick successes that will keep the momentum going and include communities.
104. Countries should be reporting back on how they advance on goals and commitments pledged at the multitude of conferences. Governments will want to do it themselves; however, consideration should be given to an independent auditor. The ICCWC indicators of effective enforcement could be used either way. Collaboration on concrete, evidence-based and manageable actions that are effective and consistently monitored can improve efforts to combat wildlife trafficking.

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