FIGHTING ILLICIT WILDLIFE TRAFFICKING

A consultation with governments conducted by Dalberg
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**WWF**

WWF is one of the world’s largest and most experienced independent conservation organizations, with over 5 million supporters and a global network active in more than 100 countries.

WWF’s mission is to stop the degradation of the planet’s natural environment and to build a future in which humans live in harmony with nature, by conserving the world’s biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

**Dalberg**

Dalberg Global Development Advisors is a strategic consulting firm that works to raise living standards in developing countries and address global issues such as climate change.

Dalberg works with governments, foundations, international agencies, non-governmental organizations, and Fortune 500 companies to make sustainable improvements in the lives of disadvantaged and underserved populations around the world.

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- Global market analysis and market-entry strategies;
- Coordination and facilitation of large multi-stakeholder initiatives.

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**Acknowledgements**

We would like to thank the survey participants who generously contributed their time and their views on illicit wildlife trafficking. Representatives of the following countries contributed to the survey: Central African Republic, Cameroon, China, Democratic Republic of Congo, Germany, Indonesia, Italy, Japan, Kenya, Malaysia, Thailand, United Kingdom and United States. In addition, representatives from the following international organizations contributed to the survey: Convention on International Trade in Endangered Species of Wild Fauna and Flora, European Commission, Interpol, Lusaka Agreement, United Nations Office on Drugs and Crime, and World Customs Organization.

We would also like to thank WWF and TRAFFIC staff for their support in facilitating access to governments and for providing their technical insights into illicit wildlife trafficking.
CALL TO ACTION

Based on the findings from this study, WWF and its global wildlife trade programme, TRAFFIC, urge governments to acknowledge that the current global approach to fighting illicit wildlife trafficking is failing because governments do not give the issue high enough priority and have not succeeded in implementing an effective response – at either a national or an international level. The absence of an effective response hinders social and economic development, including potential economic loss for governments, and has direct consequences on the environment as well as national and international security.

- Although illicit wildlife trafficking is a crime with wide security implications and has well documented links to other forms of illegal trafficking, the financing of rebel groups, corruption and money laundering, the issue is primarily seen as an environmental issue, which puts it low on governments’ agendas.

- Internationally, blame for the issue is passed back and forth between source and consumer countries; and there is a lack of collaboration, coordination and accountability between the two.

- Demand is driven by consumer trends but there is little market insight into the consumer habits of the emerging middle class in key demand markets such as Asia.

- Supply-side enforcement efforts have tended to focus on rangers in protected areas. This approach has been sporadic and underinvested, and it has often neglected improved criminal investigation, prosecution and coordination both nationally (for example, in the areas of trade, justice and commerce) and internationally.

- The current increase in poaching shows that investment in frontline protection is necessary to halt immediate extinction. Simultaneously, a systemic approach from source to the kingpins, to the consumers, needs to be implemented.

It is time to change the approach to fighting illicit wildlife trafficking by creating the right incentives for all stakeholders to make the issue a priority.

WWF and TRAFFIC call upon governments to take immediate action to:

- Recognize the threat posed by illicit wildlife trafficking to their own sovereignty and the need to treat this crime equally and in coordination with efforts to halt other forms of illegal trafficking, corruption and money laundering. The issue must be addressed by multiple ministries in a coordinated manner.
• Strengthen collaborative mechanisms (for example, CITES) to enforce strict regulations and hold governments to account for their actions, including applying sanctions where necessary.

• Collaborate with civil society and the private sector to drive behavioural change efforts to reduce the incentives to consume endangered species, in particular in demand countries.

• Engage civil society and the private sector in recognizing the social and economic value of wildlife, and in carrying out activities for its conservation, to reduce the incentives to engage in the illegal traffic, in particular in supply countries.

• Work to reduce illegal supply as well as demand, as neither approach alone will be successful.

• Address illicit wildlife trafficking at an inter-ministerial level and focus on enhancing the rule of law, and strengthening custom controls and other international enforcement mechanisms.

• Change the approach to illicit wildlife trafficking in recognition of the altered, organized criminal nature of the trade. Governments should employ modern intelligence-led investigative techniques to identify and prosecute the criminals at the heart of the trade and apply penalties severe enough to create the deterrent required to discourage criminal involvement.
This report summarizes the views of a number of governments and international organizations on illicit wildlife trafficking. These views were collected through a series of structured interviews, and this report is the first to provide a snapshot of current governmental and intergovernmental opinions on this topic.

The current global approach to fighting illicit wildlife trafficking is failing, contributing to the instability of society and threatening the existence of some illegally traded species. The governments and international organizations consulted on this issue agree that the current approach is not sufficient. However, opinions on the responsibility of different actors vary: countries that are primarily associated with demand are concerned with enforcement on the supply side, while countries that are primarily associated with supply are concerned with education and enforcement on the demand side. International organizations and government representatives point out that while there are individuals within governments and international organizations who are passionate about halting illicit wildlife trafficking, it is not a priority for governments.

There is general agreement among governments and international organizations that the commitments made and the actions taken are uncoordinated and fail to address the issue effectively. There is broad recognition that the absence of an effective response threatens iconic species such as the rhinoceros, the tiger and the elephant and has far-reaching implications for society as a whole. Governments are in agreement that:

- **Illicit wildlife trafficking compromises the security of countries.** Much of the trade in illegal wildlife products is run by criminal groups with broad international reach, and the profits can be used to finance civil conflicts and terrorist-related activities. Illicit wildlife trafficking is also linked to other forms of illegal trafficking and money-laundering.

- **Illicit wildlife trafficking hinders sustainable social and economic development.** The corruption that is associated with illicit wildlife trafficking, and the security threat posed by the often violent nature of illegal wildlife product sourcing, deter investment and hinder growth in source, transit and demand countries. They reduce the effectiveness of governments, deter civil engagement, erode the rule of law, harm the reputation of and trust in the state, and affect the growth of local communities.

- **Illicit wildlife trafficking destroys natural wealth.** Wildlife is considered an important asset by many communities – often the poorest – in the developing world. The illegal exploitation of wildlife is capable of heavily depleting species and, in some cases, of bringing a species close to extinction.

- **Illicit wildlife trafficking poses risks to global health.** Illicit wildlife trafficking can represent a disease transmission mechanism that
threatens the health of humans, livestock and ecosystems, and such trade prevents more effective, regulated and legitimate treatments for disease being sought.

The representatives of governments and international organizations interviewed for this study pointed out that, to be successful, the approach to fighting illicit wildlife trafficking needs to get to the core of the issue, changing the behaviour of those people who demand, supply and otherwise profit from illicit wildlife trafficking. The momentum is building, with commitments made at Rio+20, recent CITES meetings and other global platforms. The next step is for governments and the international community to deliver on their commitments and be held to account for their action or, crucially, their lack of action.
BACKGROUND

Following an exponential increase in the poaching of elephants and rhinos for illegal international trade in recent years, WWF and TRAFFIC launched a global campaign to elevate the issue of illicit wildlife trafficking to the global agenda. In preparation for the campaign, WWF commissioned Dalberg Global Development Advisors to study the perceptions of illicit wildlife trafficking among governments and international organizations.

Dalberg consulted government representatives to explore why the current global approach to illicit wildlife trafficking is failing, why it matters to society and how the different actors should respond going forward. The consultation specifically targeted senior-level representatives from ministries of justice, trade and economic affairs to develop an understanding of the perspectives on this issue that extend beyond the environmental sphere.
Dalberg contacted more than 110 government and international organization representatives, exchanged over 450 items of correspondence with potential interviewees and finally conducted 22 interviews between June and August 2012. The 22 interviews conducted can be classified as follows:

- Eight respondents from ministries of justice, commerce and internal affairs;
- Seven respondents from ministries of environment;
- Seven respondents from international organizations.

These respondents included senior officials from source and demand countries across Africa, Asia, Europe and America, specifically: Central African Republic, Cameroon, China, Democratic Republic of Congo, Germany, Indonesia, Italy, Japan, Kenya, Malaysia, Thailand, United Kingdom and United States. They also included representatives of international organizations including CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora), European Commission, Interpol, Lusaka Agreement, United Nations Office on Drugs and Crime, and World Customs Organization.

Despite sufficient time being allocated for the consultations, most of the representatives from the target government ministries, particularly justice, commerce and internal affairs, either did not reply or decided not to participate. Some representatives felt unable to answer the questions directly and referred to colleagues in their environment ministries. The limited responses from and availability of target ministries is an important signal. The reasons for this may be many and varied; however, it is important to note that there was ample opportunity to provide input, which leaves the question of whether government departments other than ministries of environment see illicit wildlife trafficking as an issue of concern to their portfolios.

Two government representatives asked for the questionnaire to be modified to remove specific questions about corruption as they did not feel comfortable answering such questions.

Due to the sensitive nature of the discussions, some interviewees requested anonymity, and these wishes were respected to ensure that honest and comprehensive insights could be recorded.
The exploitation of wild living resources, under appropriate governance and management, can provide livelihoods for many, in particular rural people. If done well, the sustainable use of wildlife provides an incentive to conserve natural ecosystems. The problem arises when the level of exploitation is capable of heavily depleting wildlife populations and even bringing some species close to extinction.

“Illicit wildlife trafficking” describes any environment-related crime that involves the illegal trade, smuggling, poaching, capture or collection of endangered species, protected wildlife (including animals and plants that are subject to harvest quotas and regulated by permits), derivatives or products thereof.¹

There are many different estimates of the financial value of illicit wildlife trafficking worldwide, however, reliable estimates are hard to find, mainly because the trade is illegal. Unreported and unregulated fisheries trade alone has been estimated at between US$4.2 billion and US$9.5 billion per year, the value of the illegal timber trade as much as US$7 billion per year, and the illicit wildlife trafficking (excluding fisheries and timber) as between US$7.8 billion and US$10 billion per year.² Combining these numbers, illicit wildlife trafficking (including timber and fisheries) comprises the fourth largest global illegal trade after narcotics, humans and counterfeit products.³

Drug and human traffic are getting a lot more attention than illicit wildlife trafficking. And just as we need to intensify our efforts to combat the drug trade and human trafficking, we also need to intensify our efforts to combat illicit wildlife trafficking. A recent visit to Southern Africa has strengthened my already deep convictions about this. All of these are moral outrages and serious legal violations. Many are connected to organized criminal conspiracies. They also bring instability to several parts of the world. They all need to be addressed through bold and consistent actions by the international community.


³ http://transcrime.gfintegrity.org
Illicit wildlife trafficking has increased over the last few years despite the combined efforts of the international community, governments and civil society. The trend is confirmed by some of the most recent events relating to wildlife trafficking. For example, 2011 was the highest year on record for elephant poaching; the theft of rhinoceros horns from museums, auction houses and antique shops has increased in the European Union; ivory estimated to weigh more than 23 tonnes—a figure that represents 2,500 elephants—was confiscated in 17 large-scale (>800 kg) seizures of illegal ivory in 2011; and the illegal poaching of rhinos in South Africa surged to a record high in 2011, with a final death toll of 448. WWF has confirmed that between 2007 and 2011 the numbers of rhinos poached in South Africa increased by 3,000 per cent. The examples below highlight the increasing trend of illegal trade in wildlife.

**Supply:** In February 2012, hundreds of elephants were slaughtered in a single incident in Bouba N’Djida National Park, Cameroon, by poaching gangs on horseback armed with military-issue machine guns. The gangs are believed to have originated from Chad and Sudan and to have entered Cameroon through neighbouring countries. Similar mass elephant poaching events have since occurred throughout Central Africa. The seriousness and scale of the February incident in Cameroon was a wake-up call for the international community and the governments of the affected countries in terms of the security threat posed by these actions.

This most recent incident of poaching elephants is on a massive scale but it reflects a new trend we are detecting across many range states, where well-armed poachers with sophisticated weapons decimate elephant populations, often with impunity. This spike in elephant poaching is of grave concern not only to Cameroon, a member state of CITES, but to all 38 range states of the African elephant, as well as the Secretariat.

John Scanlon, Secretary-General of CITES (February, 2012)

**Demand:** Emerging evidence of rhinoceros horn being used as a palliative medicine for cancer, along with its use as a “hangover cure” by affluent people in some countries, explains the upsurge in rhinoceros horn trading in Viet Nam. This trade is underpinned by persistent urban myths and hype about dubious miraculous cures and cancer remission following treatments using rhinoceros horn. As a result, the country’s appetite for the substance is playing an important role in the increase in global demand for rhinoceros horn.

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The trade has become a lucrative business for criminal syndicates. The risk involved is low compared to drug trafficking, and high profits can be generated. The price of rhinoceros horn has increased to around US$60,000 per kilogram – twice the value of gold and platinum – and it is now more valuable on the black market than diamonds and cocaine. The penalties associated with trafficking rhinoceros horn are not aligned to its value: poachers convicted under the North West Province law in South Africa may get away with a US$14,000 fine, while trafficking up to 5 grams of cocaine is sentenced with not less than five years in jail. The situation is no different in demand countries, where those found to be in possession of drugs are far more seriously punished than those in the possession of illegal wildlife products.

The rise in Asian demand for trafficked wildlife can be linked directly to poaching increases in Africa, as shown by the CITES elephant report to the 62nd Standing Committee meeting. This document reports, for example, that elephant poaching increases in Africa are closely correlated with increases in consumer purchasing power in China, the main demand country for ivory.

In wildlife trade, both legal and illegal, there is always a value chain from the capture or harvesting of wildlife to transportation and marketing to consumers. Intermediate collation and/or processing destinations are usually found along the chain. In this general pattern, a distinction can be made between source countries and consumer countries, but the two roles are not necessarily mutually exclusive. Organized criminal groups essentially form distribution networks across national boundaries linking source countries and consumer countries, often via important transit destinations. They commonly use indirect routes to avoid detection. Figure 1 shows a simplified view of the illicit wildlife trafficking value chain.

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**Figure 1:**
The generic illegal wildlife trade value chain

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10 Hui Min Neo. 2009. Smuggling wildlife: From eggs in a bra to geckos in underwear (referencing John Sellar, chief enforcement officer, CITES). AFP.
The demand for wildlife products comes from a number of different consumer groups and is, in some cases, heavily influenced by culture. On one side of the spectrum, there is demand that is fueled by the perceived medicinal value of some products or the social status that is associated with them. On the other side, there is demand that is fueled by opportunistic buying and often ignorant tourists who purchase souvenirs or pets to take home. The sources of demand most frequently mentioned by government representatives interviewed in this study are:

- **Medicinal products.** Perceived medicinal value, such as cancer treatment, is driving demand.

- **Consumer goods.** Associated social status is driving demand – for example, at the CITES 62nd Standing Committee meeting a representative from the Chinese government stated, “In recent years, the collection of arts and crafts, jewellery and antiques, including ivory carvings, has become fashionable and the price of those items has increased significantly.”

Other drivers of demand include opportunistic buying driven by the desire to possess exotic pets, hunting trophies and rare plants and animals.

All the respondents interviewed for this study were of the opinion that the primary driver of demand is the social status associated with the products being trafficked. However, it is not possible to clearly quantify the relative importance of each factor and its influence on demand for wildlife products.

The international supply chain for illicit wildlife trafficking involves organized criminal groups that are attracted to the availability of huge profits and the low-risk nature of the crime, including the absence of credible enforcement, prosecution, penalties and other deterrents. One of the interviewees stated, “You can pick up the trafficker but they are likely to get off with just a fine. The police are simply too busy with other issues.” The profits to be made are very high, with the value of the products increasing by multiples of 25 to 50 along the commodity chain.\textsuperscript{15}

There are many different actors who facilitate the supply side of illicit wildlife trafficking. Illegal wildlife products are generated in a range of different ways – from local individual poachers who, facilitated by local middlemen, act out of opportunism or need; to criminal and rebel groups that seek to finance their illegal activities; and professional international hunters who use their experience for higher profit, often working for international clients. Illegal wildlife products can also come from legally hunted trophies, privately held stocks not declared or registered with the authorities, or the theft of products from private and public owners and institutions.

Figure 2 shows a simplified view of the international trafficking routes for various illegal activities, including illicit wildlife trafficking.


Poaching tends to thrive in places where corruption is rife, government enforcement is weak and there are few alternative economic opportunities. Respondents from the international organizations that took part in this study, and most government representatives, highlighted corruption as one of the most critical factors enabling illicit wildlife trafficking. Corruption facilitates transactions between supply, transit and demand countries. As mentioned by a government representative who asked to remain anonymous, “Corruption is a serious issue. Criminal organizations and exporters have a lot of money and they can pay rangers, customs officers and police officers to receive false documents certifying the legal provenance and make sure the products do not get stopped at the borders.” Two government representatives refused to answer specific questions about corruption as they did not feel comfortable answering such questions.

Transparency International defines corruption as “the misuse of entrusted power for private gain”. Corruption takes many forms, from bribes to extortion to patronage. Corruption flourishes where there are few institutional checks on power, where decision-making is obscure, where civil society is weak and where poverty is widespread.

Corruption is generally linked to weak governments. Governments that are politically weak tend to rely on unstable alliances, corrupt rulers and powerful elites that have a shared stake in the corrupt state. Under a weak government there is weak rule of law, physical and economic insecurity, and weak political accountability – all factors that support illicit wildlife trafficking and its impunity.

Poverty, a general lack of alternatives for income generation and cultural influence have played a role in the recent increases in illicit wildlife trafficking.
The two interviewees featured below, from the Baka and Bantou tribes respectively, are ex-poachers from Cameroon. They agreed to tell their story on the condition that their real names remain confidential. Their stories demonstrate that for the fight against illicit wildlife trafficking to be successful, the risks must be increased and the profitability lowered.

Dalberg: *Why did you decide to become poachers?*

**Ex-poacher Bantou:** I lost my parents when I was nine years old, so very early on I had to take care of myself. I became a poacher because I needed to survive and poaching is a job that pays very well. Later in my life I tried other jobs but the salary was nothing compared to what I could make with poaching. I knew it was wrong but the risks involved seemed to be minimal and it just paid too well.

**Ex-poacher Baka:** The Baka community is closely linked to the forest; we can only live with what the forest provides us through hunting and fishing. This is how I started to be a poacher – hunting is part of my culture and I soon realized that hunting protected animals was providing me with much more money. There are a lot of people in my village involved in this activity because of the money that it can provide.

Dalberg: *Why did you decide to stop being a poacher?*

**Ex-poacher Bantou:** The police caught me and I spent two years of my life in Yaoundé’s prison. It was the worst experience of my life; the suffering and pain were extreme. Since I left the prison, I have worked for a bit but I have not been able to find a steady, long-term job. I know poaching is bad and I do not want to go back to prison, but finding another job that provides enough resources is really hard.

**Ex-poacher Baka:** I ended up in prison as well and I was terrified by the whole experience. I do not want to go back but I need to make money.

Dalberg: *What can your government and the international community do to help other poachers like you to stop?*

**Ex-poacher Bantou:** They need to give us opportunities to work and support our families. I am in good health and I want to work but there are no opportunities for me. I will be happy if I can have my piece of land, be a farmer and have enough resources to take care of my family.

**Ex-poacher Baka:** Since I left prison I have tried to survive with fishing, but it is not easy. There are not enough resources and I am not making enough money compared to the people living in my village who are still participating in hunting of protected animals.
One of the areas this study aimed to explore was the destabilizing effect of illicit wildlife trafficking on society, beyond its direct environmental consequences. For this purpose, attempts were made to interview representatives of ministries other than those handling environment and wildlife; however, the response rate from those ministries was particularly low. The issue of illicit wildlife trafficking is almost always seen as an environmental issue first and as a transnational crime and justice issue second. Requests for interviews with representatives of ministries of finance were consistently declined. Some targeted respondents indicated that they did not feel comfortable answering questions on the topic, and others said that the topic did not fall into their area of competence and that they would not be able to answer the questions asked.

The representatives of governments and international organizations who participated in this study see illicit wildlife trafficking as having far-reaching implications for society. They agreed that illicit wildlife trafficking threatens:

- National and international security, through its links with organized crime, money laundering and drug trafficking;
- The social and economic development of countries that are known to have weak state capacity, poor law enforcement, rife corruption and porous borders;
- The environment, including the potential loss of biodiversity and the introduction of invasive species;
- Global health, through transmission of disease – for example, through illegal bush meat trade.

Figure 3: The destabilizing ripple effect of illicit wildlife trafficking
INTERPOL and the UNODC’s Commission on Crime Prevention and Criminal Justice agree that the involvement of organized crime syndicates and rebel groups in wildlife crime to fund their activities and purchase weapons has increased.\(^{17,18}\)

During its years of war with Northern Sudan, the Sudan People’s Liberation Army of what is now South Sudan is alleged to have poached elephants “with grenades and propelled grenades”.\(^{19}\) Sudanese militias, including the Janjaweed, are also reported to have engaged in the poaching of ivory for profit in Chad, Kenya and elsewhere.\(^{20}\) These groups engage in the international management of shipments and do not hesitate to use violence or threats of violence against those who try to stand in their way.\(^{21}\) They constantly adapt their tactics to avoid detection and prosecution, making national borders increasingly irrelevant.

In Africa, ongoing armed conflicts and illicit wildlife trafficking seem to be interlinked, and wildlife trafficking is often used to finance terrorist activities and launder money from other illegal trafficking activities.\(^{22}\) In a recent questionnaire on poaching levels and dynamics across Africa, more than half of the respondents asked not to be named or quoted, raising concerns about the type of potential repercussions that might have led those respondents to want to keep their contributions anonymous.\(^{23}\)

In addition, wildlife crime is known to involve significant organized criminal networks that are engaged in a range of criminal activities. They are responsible for the corruption of officials, fraud, money laundering and violence, causing social unrest and undermining the rule of law and confidence in government institutions.

INTERPOL Environmental Crime Programme (July, 2012)

One direct impact of illicit wildlife trafficking on the social and economic development of a country is the immediate and irreversible depletion of valuable assets. A government representative who asked to remain anonymous stated, “The government does not receive any tax or revenue to support the economic activities and the country loses a lot of resources.”

The second important impact on the social and economic development of a country is the corruption that is associated with illicit wildlife trafficking.


Corruption was stated to be of grave concern to all those who participated in this study, as it has a direct impact on the wealth of a country. Corruption weakens macroeconomic and fiscal stability, deters investment and hinders growth. It reduces the effectiveness of government, deters civil engagement and distorts public expenditure decisions. It erodes the rule of law and harms the reputation of and trust in the state. In short, corruption increases wealth for a few at the expense of society. In addition, it directly benefits the interests of the criminal groups involved to hinder the development of legitimate businesses such as tourism. By affecting the viability of legitimate traders and other legal businesses, this can result in loss of revenue and a cost to the state if those businesses fold, with resultant unemployment.

Tackling organized crimes such as illicit wildlife trafficking is essential to secure sustainable economic growth in the continent. It is then of paramount importance that national governments – and regional institutions such as my own – do everything they can to tackle illicit wildlife trafficking. Our approach to tackling illicit wildlife trafficking must be of a magnitude that matches its severity. That means attention from the highest levels of government.

Donald Kaberuka, President, African Development Bank (August, 2012)

The effect of illicit wildlife trafficking on the environment is direct and potentially irreversible. Recently there has been a drastic decline in the populations of many wildlife species with high commercial value, many of which are now rare, endangered or locally extinct – for example, forest elephants in certain parts of the Congo basin, the Sumatran rhinoceros, the Javan rhinoceros and the Asian elephant.

Wildlife trade, legal and illegal, is also associated with the introduction of invasive species. These invasive species prey on or compete with native species and are a major threat to the balance of ecosystems. For example, pet Burmese pythons let loose by their owners are now considered a major pest in Florida’s everglades.

The new wave of organized wildlife trade crime with heavily armed groups of poachers acting across borders is jeopardizing conservation successes we had in the past and puts in danger whole ecosystems in many countries. It is thus threatening people’s livelihoods and has severe socioeconomic effects for the countries affected.

Christian Glass, Federal Ministry for Economic Cooperation and Development, Germany (August, 2012)

Trade in wildlife provides disease-transmission mechanisms at scales that not only cause human disease outbreaks but also threaten livestock, international trade, rural livelihoods, native wildlife populations and the health of ecosystems. Nearly 75 per cent of emerging infectious diseases in humans are of animal origin, the majority of which originate in wildlife. Illicit wildlife trafficking increases the risk of global epidemics such as avian influenza and SARS. Global health experts have established the importance of tracking diseases associated with the illicit wildlife trafficking and support the need for reinforced surveillance at ports of entry.

25 Some examples include: a psittacosis infection in customs officers in Belgium after being exposed to illegally imported parakeets; and an avian influenza virus carried by crested hawk eagles smuggled into Europe. See: Chomel, B.B. 2007. Wildlife, Exotic Pets, and Emerging Zoonoses. Emerging Infectious Diseases, 13:1 (2007), 6–11. Centers for Disease Control and Prevention, Atlanta, Georgia, USA.


THE APPROACH TO ILICIT WILDLIFE TRAFFICKING IS FAILING

The representatives of governments and international organizations who were interviewed for this study broadly agree that the current approach to fighting illicit wildlife trafficking is not sufficient; however, opinions vary as to the root cause of the trade. The most predominant views are described below.

The representatives of all governments – with the exception of China, which does not see illicit wildlife trafficking as the most urgent issue – indicated that the best result would be achieved through demand reduction in consumer countries. Economic growth in consumer countries and the associated surge in demand show that the current approach to fighting illicit wildlife trafficking is no longer adequate.

According to some respondents, the effect of economic growth in consumer countries is exacerbated by the increased accessibility of illegal wildlife products through the internet. A recent article published by TRAFFIC\(^{29}\) shows that, despite law enforcement efforts, the sale of illegal wildlife goods online has been gaining ground. Governments from source countries in particular called for help from the international community with the implementation of regulations and laws governing the trade in endangered species, in particular ensuring that online marketplace rules reflect current laws and policies.

Approach is not systematic

The government representatives of countries that are primarily associated with supply and international organizations commented that the current approach to fighting illicit wildlife trafficking is too uncoordinated and dispersed, limiting its impact. They called for a more systematic approach that surmounts national borders and at the same time addresses all steps in the trade chain through a coordinated effort of international organizations, governments and civil society. This could include raising awareness of the destabilizing effects of illicit wildlife trafficking, identifying the barriers to fighting supply and demand, and articulating a clear set of actions that will address those barriers at their core – for example, awareness-raising, capacity-building, law-making, the use of intelligence-led investigative techniques and effective prosecution.

ILLEGAL WILDLIFE TRAFFICKING IS A
CRIME THAT REQUIRES
INTERNATIONAL COLLABORATION

Ben Janse van Rensburg,
Chief of Enforcement Support,
CITES (August, 2012)

**Dalberg:** Mr Janse van Rensburg, what is your background and why did you decide to work in enforcement?

**Janse van Rensburg:** I joined the CITES Secretariat on 15 December 2011. Before this I was a member of the South African Police Service for more than 20 years in different roles, including as the commander of the environmental crime desk and supervisor at the general desk of the Interpol National Central Bureau in Pretoria.

**Dalberg:** What is the role of the environmental crime desk?

**Janse van Rensburg:** The environmental crime desk is responsible for national and international liaison with relevant enforcement authorities to ensure that pollution and wildlife crimes with international links are adequately investigated. It was established in response to a growing number of transnational environmental crimes and the associated risks to security, livelihoods and the environment. I worked closely with South African government agencies involved in fighting the issue of illicit wildlife trafficking, including customs, police and other enforcement authorities. As an officer of Interpol, I had the opportunity to establish relationships with different organizations in the country and abroad.

**Dalberg:** Illicit wildlife trafficking is increasing. What is your theory as to why the current approach has not been successful?

**Janse van Rensburg:** There is clear evidence that organized crime syndicates are increasingly involved in wildlife crime. Available intelligence confirms that organized crime syndicates have well-established networks which can generally be divided into five levels, with a specific activity associated with each level: (1) poacher, (2) local courier, (3) national facilitator, (4) national exporter and (5) receiver in the consumer country. I strongly believe that the current approach to fighting wildlife crime is not achieving its full potential because not all levels are addressed effectively, in particular levels 4 and 5.
The challenge with levels 1, 2 and 3 is that the potential profits of trading illegal wildlife products continue to outweigh the risk. Some countries have been successful in increasing the risk by improving investigation, prosecution and sentencing; however, the potential profits are such that there are plenty of new candidates ready to fill the shoes of criminals who are arrested and prosecuted. The priority for levels 1, 2 and 3 is to continue to increase the risk.

**Dalberg:** What approach would you recommend?

**Janse van Rensburg:** Organized crime syndicate members at levels 4 and 5 are often located in consumer countries, beyond the reach of enforcement authorities in range countries. For this reason, increased international cooperation is vital.

The problem is transnational and involves range, transit and destination states. A coordinated approach at both a national and an international level is required to ensure that the entire crime chain at all five levels of illicit wildlife trafficking is addressed.

In this regard the International Consortium on Combating Wildlife Crime (ICCWC) was created in 2010. ICCWC comprises the CITES Secretariat, INTERPOL, the United Nations Office on Drugs and Crime, the World Bank and the World Customs Organization, and it seeks to ensure that the perpetrators of serious wildlife crimes will face a more formidable and coordinated response.

Demand reduction is also important, and consumers need to be made aware of the impact of consuming illegal wildlife products and the associated destruction of the environment. This can be done through targeted consumer campaigns by governments and through civil society, supported by governments.
Approach lacks commitment and accountability

Combating wildlife and forest crime is not currently a priority and often remains overlooked and poorly understood, despite the actual and potential scale and consequences. Wildlife and forest policies and laws and their enforcement have not, or not always, kept up with the changing levels and patterns of trafficking in fauna and flora.

Jorge Eduardo Rios, Anti-Wildlife and Forest Crime Programme, UNODC (July, 2012)

The representatives of international organizations interviewed for this study stated that the problem is not one of making commitments but one of accountability. As long as there are no credible incentives for governments to comply with international commitments, progress will be limited. In addition to compliance with CITES, three main areas where governments could be incentivized to make commitments and be held accountable were highlighted, as follows:

1. Improvement of rule of law by strengthening criminal investigation, prosecution and sentencing

The representatives of governments that are primarily associated with consumption raised the need to step up enforcement in supply countries. As mentioned earlier, the lack of credibility in relation to law making, criminal investigation, prosecution and sentencing is a major barrier to enforcement. The absence of credible enforcement incentivizes involvement in illicit wildlife trafficking as an alternative to other crimes such as drug trafficking or human trafficking. In many of the source and consumer countries, wildlife crime carries a lower risk of detection and prosecution than other illegally trafficked items, such as drugs and humans. Even when found guilty, those who have profited from illicit wildlife trafficking receive relatively low penalties, making the business an attractive option for criminal groups.
2. Deployment of resources
Most of the government representatives, except China and Japan, indicated that they expect a reduction in demand will have the most impact. In order to address the demand side effectively, it is important to fully understand and address the causes of increasing demand. The capacity to understand and address demand is critical to influence the behaviour of consumers.

Without sufficient resources we cannot fight the illegal trade in wildlife. We only have 110 rangers to protect all our national parks, which represent 11 per cent of the national territory – or 6.4 million hectares.30

Jean-Baptiste Mamang-Kanga, Head of Wildlife Division and Protected Areas, Central African Republic (July, 2012)

Don’t say “You do not do enough”. Certainly we do not do much, but this is mainly due to the constraints in resources. International organizations should support us, especially the local conservation NGOs.

Zaaba Zainol Abidin, Deputy Director-General, Department of Wildlife and National Parks, Malaysia (July, 2012)

Directly linked to the lack of resources is the need to have the right type of resources. Most developing countries do not have access to modern investigative tools such as DNA mapping and other advanced forensic methodologies to trace products. Even basic methodologies for operations such as crime scene investigations, which are critical for effective prosecution, are often not carried out appropriately.

3. Support a change in consumer behaviour
In order to address the demand side effectively, it is important to understand and address the causes of increasing consumption.

The capacity to understand and address demand is critical to influencing the behaviour of consumers. At the TRAFFIC Creative Experts Meeting on Messaging to Reduce Consumer Demand for Tigers and Other Endangered Wildlife Species in Viet Nam and China (Hong Kong, 22-23 November 2011), experts discussed the lessons learned from past campaigns and developed best practices for future reference.

Campaigns to address consumer demand have been ineffective31
There are good examples of effective approaches to address consumer demand and illegal trade, but overall they have failed because they have not been pursued on a scale large enough to have an impact or for a long enough duration to achieve measurable change, or they simply have not managed to change behaviour. Other factors – personal, cultural, societal, financial – can supersede the “rational” arguments presented by awareness-raising campaigns.

Much of the effort has been focused on factors that influence consumer preferences and behaviour, such as those in their direct environment (legislation, government policy, governance and so on). However, little focus has been geared towards social and personal factors such as group norms, values, beliefs, trends and dynamics.32

New approaches inspired by learning from other sectors may be the solution
There needs to be a paradigm shift in the design, planning and execution of demand reduction strategies. Environmentalists and experts from relevant fields should apply more strategic methods, particularly those based upon better understanding the fundamental factors influencing the behaviour of consumers, how we want to influence their behaviour and how we would want to accomplish behavioural change.

Demand reduction efforts should refrain from providing people with vague or over ambitious actions but offer them more concise, “doable” and measurable actions that are applicable to their lifestyles. A campaign should not just ask people to “reduce their demand for endangered species” but encourage, for example, a change to the gifting culture of a businessman or a change to a person’s lifestyle in terms of food or medicine consumption. Consideration should also be given to potentially large audiences, such as young people, that have the potential to influence those that are not currently motivated to act or do not know how they can make a difference.

We recognize the important role of the Convention on International Trade in Endangered Species of Wild Fauna and Flora, an international agreement that stands at the intersection between trade, the environment and development, promotes the conservation and sustainable use of biodiversity, should contribute to tangible benefits for local people, and ensures that no species entering into international trade is threatened with extinction. We recognize the economic, social and environmental impacts of illicit trafficking in wildlife, where firm and strengthened action needs to be taken on both the supply and demand sides. In this regard, we emphasize the importance of effective international cooperation among relevant multilateral environmental agreements and international organizations. We further stress the importance of basing the listing of species on agreed criteria.

Future We Want, Rio+20, United Nations Conference on Sustainable Development, paragraph 203 (June, 2012)
The first crucial steps towards a stronger response to illicit wildlife trafficking have been taken.

Firstly, the recent creation of the International Consortium on Combating Wildlife Crime (ICCWC) has been an important step to ensure collaboration and alignment of initiatives amongst all actors.  

Secondly, illicit wildlife trafficking has also been profiled in several international fora, such as resolutions in the United Nations General Assembly, the Commission on Crime Prevention and Criminal Justice, and the Asia Pacific Economic Cooperation. Rio+20, the United Nations Conference on Sustainable Development (June 2012), recognized the important role of CITES in its outcomes document. Paragraph 203 “recognizes the economic, social and environmental impacts of illicit trafficking in wildlife, where firm and strengthened action needs to be taken”.

Thirdly, the discussion about what happens in 2015, when the Millennium Development Goals expire, has started to focus on Sustainable Development Goals. This discussion shows the increasing urgency of making growth sustainable. The second pillar, environmental sustainability, offers opportunities for the inclusion of illicit wildlife trafficking in a broader discussion that looks at developing sustainable, best practice, appropriate market incentives along with individual responsibility.

Finally, the United Nations’ work on strengthening the rule of law provides an important framework to deal not just with organized crime in general but also with illicit wildlife trafficking. The UN’s rule of law activities support the development, promotion and implementation of international norms and standards in different fields, including trade, to promote sustained economic progress. This work will act as an enabler in the fight against illicit wildlife trafficking.

These steps and other national and international developments present an opportunity to strengthen the fight against illicit wildlife trafficking.

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33 ICCWC exists to support those officers serving in the front line in carrying out their essential duties – and in doing so to work with regional wildlife enforcement networks such as the ASEAN Wildlife Enforcement Network (WEN) and South Asian WEN and other agencies such as the Department of Justice, ICCWC comprises the CITES Secretariat, INTERPOL, the United Nations Office on Drugs and Crime (UNODC), the World Bank and the World Customs Organization (WCO).
The representatives of governments and international organizations interviewed for this study called for international organizations, governments and civil society to:

- Take up their responsibility to collaborate more effectively in identifying the root causes of illicit wildlife trafficking right along the value chain, irrespective of national borders;
- Design specific initiatives to undertake in response to those root causes;
- Assign accountability for each initiative and monitor the implementation of the initiatives.

Specifically, the need for cross-ministerial collaboration was mentioned as a critical step in defining possible strategies to address the problem. Guaranteed sufficient funding would also help to ensure the effectiveness of the initiatives.

Also mentioned by the interviewees, a critical success factor in a systematic approach to fighting illicit wildlife trafficking is the ability to hold the different actors to account for their actions and, crucially, for their lack of action. The international community has to provide clear incentives that underpin the need for action, in particular for governments. A monitoring and evaluation framework should put in place these basic incentives by measuring and communicating implementation progress and results.

The private sector must also play an important role in the approach. On the supply side, there is a clear incentive for the tourism industry to preserve wildlife, in particular for those countries primarily dependent on wildlife to attract tourists. Several segments of the private sector, such as extractive industries (logging and mining) can also be directly implicated in illicit wildlife trafficking – for example, by facilitating the access of poachers to previously inaccessible areas or by allowing their employees to engage in illicit wildlife trafficking. These companies can play a major role in a systematic approach by adopting and implementing best-practice principles to ensure they are not implicated in illicit wildlife trafficking and by providing sufficient incentives to their employees, such as adequate alternative protein.

China is working with national private companies working in Africa to train their employees on the risks involved in illegal trafficking of wildlife. In addition, we collaborate with Chinese embassies and consulates on the African continent to conduct awareness campaigns for Chinese tourists travelling to the countries most affected by this issue.

Wan Ziming, Coordinator, China’s National Inter-agencies CITES Enforcement Coordination Group, and Director, Law Enforcement and Training Division, CITES Management Authority of China, State Forestry Administration, China (July, 2012)
On the demand side, the private sector can help create awareness among employees, reject the corporate “gifting” of illegal wildlife products, improve understanding of what drives consumer behaviour and support campaigns to change that behaviour. Finally, logistics companies – shipping, airline and land-based transport (trucking and rail) – which facilitate the import, transit and export of goods, must take measures to prevent and penalize the abuse of their services for illicit wildlife trafficking.

Two respondents proposed a change to the economics of illicit wildlife trafficking by regulating trade to acceptable quantities in a similar way as is gradually being done for timber and fisheries. The criticism raised in relation to this approach was that it presumes that the governance of all countries involved is effective and issues such as corruption do not present a challenge. One representative from an international organization also mentioned that this may be too much of a gamble to take with species that are close to extinction.

In addition to the general call for a more systematic approach, the respondents mentioned a number of more specific actions that could be taken to address the supply of and demand for illicit wildlife trafficking. Figure 4 shows a summary of the potential steps that actors could take, as suggested by the respondents. The actions are grouped by the main themes of education and enforcement.

![Figure 4: A non-exhaustive overview of potential interventions](image-url)
First and foremost, the representatives of governments and international organizations consulted for this report stressed the need for more effective awareness-raising campaigns to communicate the destabilizing effects of illicit wildlife trafficking. Such campaigns should target those that supply, demand or otherwise profit from illicit wildlife trafficking. In particular, on the demand side, an understanding of the fundamental factors influencing the behaviour of consumers will help to design more effective campaigns. It is difficult to deter consumers who believe in the medicinal value of illegal wildlife products or who see a product that used to be only for the rich suddenly become accessible. The supply is limited so the consumer group cannot be too large, and that is all the more reason to invest in understanding consumer habits and how these can be influenced.

On the supply side awareness-raising campaigns need to be tailored to the different groups of stakeholders that are directly (such as rural communities, rangers and custom representatives) and indirectly (such as shipping and transport businesses, employees of foreign companies and embassies) affected by illicit wildlife trafficking.

Market control, environmental police, customs officers and forest rangers in source, transit and demand countries are best placed to control illicit wildlife trafficking. Unfortunately, most of these enforcement personnel are not trained or equipped to identify endangered species. Government representatives mentioned that tailored support should be provided by international organizations to countries in need to improve skills for personnel and ensure access to appropriate technologies.
The representatives of governments and international organizations interviewed see the need for governments to strengthen law enforcement by:

• Using controlled delivery methods to pursue criminal organizations engaging in wildlife crime (“follow the money”);
• Conducting continuous inspections and border controls;
• Systematically arresting people involved in the illegal trade;
• Prosecuting and convicting couriers, buyers, exporters, vendors and poachers of illegal wildlife products.

The establishment in early 2010 of an interim National Wildlife Crime Reaction Unit within South Africa’s Department of Environmental Affairs, which links the provincial conservation authorities of SANParks, SAPS, the National Prosecutors Association and responsible private sector bodies, is an important example of a national coordination structure for information management, law enforcement response, investigation and prosecution. Another successful example is the National Inter Agency CITES Enforcement Collaboration Group (NICECG) of China, which has mobilized over 100,000 enforcement officers in an effective offensive against wildlife crime.34

Illicit wildlife trafficking is a very important priority for the UK and addressing these crimes formed part of the government’s election manifesto. Wildlife crime will be included as an objective of the soon to be formed National Crime Agency, which will tackle all serious crimes affecting the UK such as drug trafficking.

Grant Miller, Senior Officer, National CITES team, Border Force, UK (August, 2012)

Moreover, many interviewees from source countries mentioned how collaboration at sub-regional and international level is necessary not only to implement effective custom controls, but even more to monitor illegal wildlife traffic via the Internet.

In addition, enforcement at the level of abject poverty alone will never work: unfortunately once one person is arrested, another will quickly take their place. It is the criminal groups that work across the value chain that need to be targeted.

Finally, international organizations should identify the best instruments for making demand and source countries accountable for their work and efforts. The recent publication of the WWF Wildlife Crime Scorecard35 is a good example of a reporting initiative. This report measures progress towards compliance with and enforcement of CITES commitments for the three species groups (elephants, rhinos and tigers) and aims to acknowledge those countries where illegal trade is actively being countered in contrast with those where the current efforts are entirely inadequate.

## Abbreviations and acronyms

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<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>CITES</td>
<td>Convention on International Trade in Endangered Species of Wild Fauna and Flora</td>
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<td>ICCWC</td>
<td>International Consortium on Combating Wildlife Crime</td>
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<td>NICECG</td>
<td>National Inter Agency CITES Enforcement Collaboration Group</td>
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<tr>
<td>Rio+20</td>
<td>United Nations Conference on Sustainable Development (June 2012)</td>
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<td>SANParks</td>
<td>South Africa National Parks</td>
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<td>SAPS</td>
<td>South African Police Service</td>
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<td>SARS</td>
<td>Severe Acute Respiratory Syndrome</td>
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<td>SDGs</td>
<td>Sustainable Development Goals</td>
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<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
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<td>WCO</td>
<td>World Customs Organization</td>
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<td>WWF</td>
<td>World Wide Fund for Nature (formerly World Wildlife Fund)</td>
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FIGHTING ILLICIT WILDLIFE TRAFFICKING
A consultation with governments

100 MILLION
100 million tonnes of fish, 1.5 million live birds and 440,000 tonnes of medicinal plants are traded illegally each year

2,500
 Illegal ivory from an estimated 2,500 elephants was confiscated in 2011

176
There are 176 member nations to the Convention on International Trade in Endangered Species of Wild Fauna and Flora

2,500
Some 2,500 new rangers are being hired in Cameroon to protect wildlife

10 BILLION
The illicit wildlife trade (excluding fisheries and timber) has been valued at up to US$10 billion per year

60,000
The price of rhino horn has risen to US$60,000 per kilogram

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