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Occasional Paper

# Illegal Wildlife Trade and Financial Investigations in West Africa

Alexandria Reid and Mark Williams

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RUSI Occasional Paper, April 2021



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Royal United Services Institute for Defence and  
Security Studies  
Whitehall  
London SW1A 2ET  
United Kingdom  
+44 (0)20 7747 2600  
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All findings are the authors' own.

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# Acronyms and Abbreviations

anti-money laundering	AML
Asia-Pacific Group on Money Laundering	APG
Central African Republic	CAR
Convention on International Trade in Endangered Species of Wild Fauna and Flora	CITES
counter-terrorist financing	CTF
Democratic Republic of Congo	DRC
Eco Activists for Governance and Law Enforcement	EAGLE
Egmont Centre of FIU Excellence and Leadership	ECOFEL
Environmental Investigation Agency	EIA
East and Southern Africa Anti-Money Laundering Group	ESAAMLG
Economic Community of West African States	ECOWAS
Financial Action Task Force	FATF
financial intelligence unit	FIU
Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale	GABAC
Inter-Governmental Action Group against Money Laundering in West Africa	GIABA
illegal wildlife trade	IWT
International Criminal Police Organization	Interpol
mobile money operator	MMO
National Environmental Standards and Regulation Enforcement Agency (Nigeria)	NESREA
national money laundering and terrorist financing risk assessment	NRA
non-governmental organisation	NGO
suspicious transaction report	STR
Tri-National Dja-Odzala-Minkébé area	TRIDOM
United Nations Office on Drugs and Crime	UNODC
United Nations Convention against Transnational Organized Crime	UNTOC
West Africa Biodiversity and Climate Change	WA BiCC
West Africa Network to Combat Wildlife Crime	WAN or WANCWC
West Africa Strategy on Combating Wildlife Crime	WASCWC



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# Executive Summary

**I**N THE LAST five years, West Africa has emerged as a major source and transit hub in the global illegal wildlife trade (IWT).<sup>1</sup> The industrial scale of the multi-tonne, multi-product seizures originating from West Africa clearly demonstrates that profit-driven organised crime groups are running the trade. Yet, while the significance of the region in global IWT flows is increasingly recognised, very little is known about the financial aspects of these criminal operations.

Based on 89 interviews with key stakeholders in West and Central Africa, as well as a survey of 12 out of 17 financial intelligence units (FIUs) based in the member states of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), this paper assesses the extent to which the financial dimensions of IWT are investigated in the region. It finds that no country in West Africa currently conducts routine parallel financial investigations in IWT cases. Key findings include:

1. Of the countries that responded to the survey, 86% considered IWT a 'serious issue', but only 58% made reference to environmental crime or IWT in their national money laundering and terrorist financing risk assessments.
2. Only one FIU considered itself to be regularly involved in the investigation of wildlife cases.
3. Only 25% (three) of the FIUs that responded to the survey reported ever having conducted a financial investigation related to IWT. No country had completed more than one wildlife-related financial investigation. None led to a prosecution for money laundering or another financial crime.
4. FIUs have very minimal knowledge about the methods used to generate, transfer and launder the proceeds of IWT in West Africa.
5. Almost all GIABA member states criminalise environmental crime as a predicate offence to money laundering, but most FIUs identified a 'lack of awareness of IWT as a predicate offence' as the most important reason why financial investigations do not currently occur in wildlife cases.
6. Most FIUs identified the need for greater training, knowledge and financial resources to pursue IWT cases as a capacity-building priority.

A lack of financial action against IWT is not unique to West Africa. Financial investigations are standard practice for other forms of organised crime but are still seldom undertaken in IWT cases worldwide.<sup>2</sup> This is the case despite the large profits generated by IWT, defined in this paper as including both flora and fauna. Despite the inherent difficulties

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1. UN Office on Drugs and Crime (UNODC), *World Wildlife Crime Report: Trafficking in Protected Species* (New York, NY: UN, 2020); UNODC, *World Wildlife Crime Report: Trafficking in Protected Species* (New York, NY: UN, 2016).
  2. Financial Action Task Force (FATF), 'Money Laundering and the Illegal Wildlife Trade', June 2020.

estimating the value of environmental crime, by some calculations, timber trafficking alone is worth between \$50 and \$150 billion annually,<sup>3</sup> with wildlife trafficking amounting to a further \$7 to \$23 billion a year.<sup>4</sup> This makes IWT the fourth-largest form of illicit trade in the world, after arms, drugs and human trafficking.<sup>5</sup>

Recognising the urgency of this issue, in 2020, the Financial Action Task Force (FATF) released a global study urging countries to assess their exposure to illicit financial flows associated with IWT and to pursue the greater use of financial investigation in IWT cases. The FATF will review how their recommended actions on IWT have been implemented in late 2021.<sup>6</sup>

Against this backdrop, this paper aims to assist GIABA member states in a number of ways. First, it analyses IWT trends in West Africa, with a focus on high-grossing trafficking in elephant ivory, pangolin scales and rosewood. Second, it identifies key challenges that currently prevent the use of financial investigation in IWT cases, with a view to establishing baseline levels of awareness and capacity to combat IWT as a financial crime among FIUs in the region. Third, it provides recommendations to support the implementation of the FATF's guidelines in the region.

In doing so, this paper also aims to support the overarching objectives of the West Africa Strategy on Combating Wildlife Crime (WASCWC), which is to be adopted by the Economic Community of West African States's heads of state in 2021.<sup>7</sup> The official Strategic Priorities guiding the WASCWC stress the need to leverage 'existing systems for fighting corruption, fraud and money laundering to support the fight against wildlife crime', and to ensure that financial investigation skills are included in future wildlife-related capacity-building programmes.<sup>8</sup> This paper therefore also seeks to provide an evidence base to inform the nature and design of such assistance.

The paper makes several policy recommendations aimed at increasing the number and quality of IWT-related financial investigations conducted in the region. These include the establishment of a financial crime working group in the West Africa Wildlife Enforcement Network that will be responsible for coordinating the implementation of the WASCWC at the regional level, and

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3. Interpol, 'Global Forestry Enforcement: Strengthening Law Enforcement Cooperation Against Forestry Crime', April 2019, p. 4.
  4. Wolfgang Lehmacher, 'Wildlife Crime: A \$23 Billion Trade That's Destroying Our Planet', World Economic Forum, 28 September 2016, <<https://www.weforum.org/agenda/2016/09/fighting-illegal-wildlife-and-forest-trade>>, accessed 15 February 2021.
  5. This paper considers illegal wildlife trade to include flora and fauna. Timber is therefore included too. See UNODC, 'Corruption and Wildlife and Forest Crime', <<https://www.unodc.org/unodc/en/corruption/wildlife-and-forest-crime.html>>, accessed 16 February 2021.
  6. FATF, 'Money Laundering and the Illegal Wildlife Trade'.
  7. West Africa Biodiversity and Climate Change (WA BiCC) and the Directorate of Environment – ECOWAS Commission, 'Combating Wildlife Trafficking in West Africa: A Guide for Developing A Counter Wildlife Trafficking Response', July 2018.
  8. *Ibid.*, p. 2. See also country threat assessments produced by WA BiCC, <<https://www.wabicc.org/en/resource-centers/documents/>>, accessed 10 February 2021.

the inclusion of FIUs and anti-corruption agencies in all national-level domestic taskforces created to address wildlife crime. In addition, many countries in the region would also benefit from reviewing recent seizures or closed wildlife cases from a financial perspective. These reviews could serve multiple purposes, including the generation of new financial intelligence and typologies, as well as support relationship building necessary for greater inter-agency collaboration in future cases.<sup>9</sup> Finally, the paper proposes several avenues for improving domestic and international cooperation and information sharing. This is a key, but currently missing, element of combating IWT in West Africa.

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9. Alexandria Reid and Tom Keatinge, 'Case Closed? Why We Should Review Historic Wildlife Trafficking Cases from a Financial Perspective', *RUSI Newsbrief* (Vol. 40, No. 2, 27 March 2020).

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# Introduction

**T**HE LAST FIVE years have seen West Africa emerge as a major source and transit hub in the illegal wildlife trade (IWT).<sup>1</sup> Today, countries in the region account for a significant proportion of all global forest elephant ivory seizures, as well as the world's largest volume of African rosewood (*Pterocarpus erinaceus*) and pangolin scale seizures.<sup>2</sup> Most of the products illegally exported from West Africa are sourced from neighbouring biodiversity hotspots in Central Africa, particularly Cameroon, Gabon, the Republic of Congo, the Democratic Republic of Congo (DRC) and the Central African Republic (CAR). Although some consumption of these species occurs for nutritional, cultural and medicinal purposes in West Africa itself,<sup>3</sup> this alone does not account for the huge volume of wildlife illegally harvested and trafficked from the region each year.

It is widely recognised that transnational trade in these products is coordinated by highly profitable and entrenched organised crime networks.<sup>4</sup> Some of these networks have been present in West Africa for over a decade, while others have moved into the region in response to increased enforcement and penalties elsewhere, particularly East and Southern Africa.<sup>5</sup> A combination of weak law enforcement capacity, low prioritisation, well-connected transportation systems and

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1. UN Office on Drugs and Crime (UNODC), *World Wildlife Crime Report: Trafficking in Protected Species* (New York, NY: UN, 2020); UNODC, 'West and Central Africa Wildlife Crime Threat Assessment', CoP18 Doc. 34, 2019, Annex 4, <<https://cites.org/sites/default/files/eng/prog/enforcement/E-CoP18-034-Threat-Assessment.pdf>>, accessed 10 February 2021.
  2. UNODC, *World Wildlife Crime Report* (2020); C4ADS, 'Tipping the Scales: Exposing the Growing Trade of African Pangolins into China's Traditional Medicine Industry', 2020, pp. 12–25.
  3. Maxwell Kwame Boakye et al., 'Knowledge and Uses of African Pangolins as a Source of Traditional Medicine in Ghana', *PLOS One* (Vol. 10, No. 1, 2015).
  4. 'Dakar Declaration on the Development of Subregional Wildlife Enforcement Collaboration', 15–17 March 2016, <<https://www.fws.gov/international/pdf/Dakar-declaration-English-French.pdf>>, accessed 28 February 2021; West Africa Biodiversity and Climate Change (WA BiCC), 'Accra Declaration on Combating Illegal Trade in Rosewoods, Timber and Forest Products in West Africa', 25 August 2019, <<https://www.wabicc.org/mdocs-posts/accra-declaration-on-combating-illegal-trade-in-rosewoods-timber-and-forest-products-in-west-africa/>>, accessed 14 February 2021; UNODC, 'West and Central Africa Wildlife Crime Threat Assessment'.
  5. Authors' video interview with two representatives of an international NGO, 2 February 2021; Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), 'National Ivory Action Plan (NIAP) Process', SC71 Doc. 11, Annex 2, 2019, p. 7, <<https://cites.org/sites/default/files/eng/com/sc/71/E-SC71-11-A2.pdf>>, accessed 20 March 2021; Environmental Investigation Agency (EIA), 'Out of Africa: How West and Central Africa Have Become the Epicentre of Ivory and Pangolin Scale Trafficking to Asia', December 2020, p. 11.

endemic corruption has seen West Africa become the consolidation and export point of choice for wildlife traffickers across Africa.

The rapidly growing scale of the threat has led to the development of a West Africa Strategy on Combating Wildlife Crime (WASCWC), which is anticipated to be adopted by the Economic Community of West Africa States (ECOWAS) heads of state and government in 2021.<sup>6</sup> Promisingly, the official Strategic Priorities supporting the WASCWC stress the need to leverage ‘existing systems for fighting corruption, fraud and money laundering to support the fight against wildlife crime’ and ensure that financial investigation skills are included in future wildlife-linked capacity-building programmes.<sup>7</sup> This mirrors international consensus that financial investigations and anti-money laundering (AML) techniques are essential tools in combating IWT.<sup>8</sup>

Financial investigations are standard practice for other serious crimes but are seldom undertaken in relation to IWT cases. In 2020, the Financial Action Task Force (FATF) – the international AML and counter-terrorist financing standard setter – conducted an analysis of 45 jurisdictions worldwide, concluding that ‘financial information is not being regularly or proactively collected, developed, and disseminated to initiate or support financial investigations into wildlife crimes’.<sup>9</sup> The FATF found that only 13 out of 45 jurisdictions analysed had received at least one suspicious transaction report (STR) related to environmental crime between 2015 and 2020, suggesting a similarly low level of awareness in the regulated private sector.<sup>10</sup> These findings echo those of earlier studies by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) and Asia-Pacific Group on Money Laundering (APG).<sup>11</sup> As a result, global enforcement action remains disproportionately focused on low-level, easily replaced poachers, leaving the controllers and ultimate beneficiaries of the trade virtually untouched.

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6. Authors’ telephone discussion with ECOWAS policymaker, 2 March 2021; authors’ video interview with two representatives of an international NGO, 2 February 2021; WA BiCC, ‘West Africa Strategy on Combating Wildlife Crime: Briefing Note for Policymakers’, 3 November 2020, <<https://www.wabicc.org/mdocs-posts/west-africa-strategy-on-combating-wildlife-crime-briefing-note-for-policy-makers/>>, accessed 25 March 2021.
  7. WA BiCC and the Directorate of Environment – ECOWAS Commission, ‘Combating Wildlife Trafficking in West Africa: A Guide for Developing a Counter Wildlife Trafficking Response’, July 2018, p. 4.
  8. FATF, ‘Money Laundering and the Illegal Wildlife Trade’, June 2020; UN General Assembly Resolution 73/343, 2019.
  9. FATF, ‘Money Laundering and the Illegal Wildlife Trade’, p. 32.
  10. *Ibid.*
  11. ESAAMLG, ‘A Special Typologies Project Report on Poaching, Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region’, June 2016, <<https://esaamlg.org/reports/TYOLOGIES-REPORT-ON-THE-WILDLIFE-CRIMES-AND-RELATED-ML..pdf>>, accessed 16 February 2021; APG and UNODC, ‘Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime’, Research Report, 2017.

In 2020, the FATF acknowledged this deficiency for the first time and called on all countries to:

1. Identify and assess money laundering risks related to IWT.
2. Ensure that national laws and law enforcement powers allow authorities to go after the finances of wildlife traffickers.
3. Pursue parallel financial investigations in relation to IWT cases.<sup>12</sup>

The FATF will conduct a review of global progress on these actions in mid-to-late 2021. Based on a survey of 12 out of 17 financial investigation units (FIUs) in the region and 89 interviews with key local stakeholders, this paper seeks to provide a strengthened evidence base to assist member states of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) to begin to implement these actions ahead of the FATF review. Accordingly, the research questions explored in this paper are:

1. What are the major proceed-generating forms of transnational IWT in West Africa?
2. What types of actors are involved in IWT in West Africa?
3. What is the policy landscape for combating IWT as a financial crime in West Africa?
4. To what extent are financial investigations currently conducted in IWT cases in West Africa?
5. What are the key challenges that prevent financial investigations from being initiated in IWT cases in West Africa?

This paper begins by outlining the methodology and terminology used in this research. It then presents key IWT trends in the region, including the types of actors involved and some of the key enablers of the trade. This is followed by an outline of the main components of the WASCWC and the policy foundation it provides to respond to IWT as a financial crime. This forms the backdrop to a discussion of the survey and interview results, which explores the extent to which financial investigations are currently conducted in IWT cases and the key barriers that prevent greater use of this approach. The conclusion provides a set of recommendations for GIABA member states, the private sector and donors. These are aimed at increasing the use of financial investigations in future IWT cases by mainstreaming financial approaches throughout the implementation of the WASCWC.

## Scope, Methodology and Terminology

### Scope

Many illegal wildlife products trafficked out of West Africa are sourced from countries in Central Africa, and existing research on IWT often couples the two regions together as a result. However, a body of evidence unique to West Africa is needed to support the WASCWC.<sup>13</sup> This paper therefore considers the West African region in its own right.

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12. FATF, 'Money Laundering and the Illegal Wildlife Trade'.

13. Although São Tome and Príncipe is a GIABA member state and responded to the survey analysed in this paper, it is not a part of ECOWAS and therefore is not expected to be covered by the WASCWC.



Several other global and regional studies have also used a survey- or questionnaire-based approach to research the financial aspects of IWT (see Table 1). However, this paper presents the first body of evidence solely focused on GIABA member states.

**Table 1:** Survey- and Questionnaire-Based Studies of Illegal Wildlife Trade as a Financial Crime

Author, Title	Date	Coverage of GIABA Member States
ESAAMLG, 'A Special Typologies Project Report on Poaching, Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region'.	June 2016	The study was limited to ESAAMLG member states.
APG, 'Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime'.	July 2017	The questionnaire issued in 2016 received multiple responses from GIABA member states but the results were aggregated with all other jurisdictions to produce global insights.
FATF, 'Money Laundering and the Illegal Wildlife Trade'.	June 2020	The FATF questionnaire issued in 2020 received only one response from a GIABA member state (Burkina Faso).
Egmont Centre of FIU Excellence and Leadership (ECOFEL), 'Financial Investigations into Wildlife Crime'.	January 2021	A survey conducted in 2020 received a significant number of responses from GIABA member states but the report's statistics and findings aggregate West <i>and</i> Central Africa together, or combine all country responses to produce global insights.

Sources: ESAAMLG, 'A Special Typologies Project Report on Poaching, Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region', June 2016; APG, 'Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime', July 2017; FATF, 'Money Laundering and the Illegal Wildlife Trade', June 2020; ECOFEL, 'Financial Investigations into Wildlife Crime', January 2021.

## Methodology

The research for this paper employed the following methods:

1. A **targeted literature review** of international, regional and national financial crime, AML and IWT-specific reports published by international organisations, governments and academic experts between 2010 and 2020. Court cases, news reports and national legal frameworks were also reviewed. The literature sample was analysed between April and November 2020.
2. A **survey of FIUs in West Africa**, which received a 71% response rate from GIABA member states (12 out of 17 countries).<sup>14</sup> The survey was sent by the GIABA Secretariat via email in September 2020 to all 17 FIUs in English, French and Portuguese. FIUs were required to reply by the end of October 2020. It used a mixture of open and closed questions to

14. See Table 2 for a list of all responding countries.

make the survey quicker to complete and encourage a greater number of responses. Using some closed questions also allowed the data to be quantified more easily. Some follow-up interviews were conducted with responding FIUs to gather additional information about their survey responses. Some survey questions were designed to produce results that could be indirectly compared to similar survey-based reports, such as the FATF's 2020 IWT report and the ECOFEL 2021 study of global FIUs.

3. **Semi-structured interviews** with 89 stakeholders using an interview protocol adjusted as necessary depending on the person's area of expertise and the context of the conversation. These interviews were conducted in English and French between May 2020 and February 2021. The majority of interviews (72) were conducted either in person or via telephone by Marius Talla, Lukman Adefolahan and Franck Moglo – researchers based in Cameroon, Nigeria and Togo, respectively.<sup>15</sup> A smaller number of video interviews (17) were conducted by the authors with interviewees primarily based in West and Central Africa and Europe. A limited number of interviews were conducted with stakeholders in Southeast Asia, a primary destination for wildlife products trafficked from West Africa.

Interviewees were identified through the literature, snowball sampling and the GIABA network of member states. Those interviewed included: government officials; regional policymakers; law enforcement officers; financial sector compliance officers; NGOs; and academic experts. Where possible, interview data was triangulated with open source references.

Methodological limitations include the incomplete survey response rate and the varying quality and detail of responses to the survey and interview questions. In addition, the national FIU in each country was the only direct recipient of the survey, meaning the responses should not be taken as representing the viewpoint of any other domestic agencies. In several cases, respondents indicated that their survey response had been completed with some input from additional agencies, such as customs or environmental authorities, but this was not systematically recorded or verified.

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15. All local coronavirus regulations were followed. Researchers and interviewees were provided personal protective equipment. Marius Talla, Lukman Adefolahan and Franck Moglo were selected for their expertise on IWT and/or corruption and financial crime.

**Table 2:** Survey Responses

Responses Received	No Response
<ul style="list-style-type: none"> <li>• Burkina Faso</li> <li>• Cabo Verde</li> <li>• Côte d'Ivoire</li> <li>• The Gambia</li> <li>• Ghana</li> <li>• Guinea-Bissau</li> <li>• Guinea</li> <li>• Niger</li> <li>• Nigeria</li> <li>• São Tomé and Príncipe</li> <li>• Senegal</li> <li>• Togolese Republic</li> </ul>	<ul style="list-style-type: none"> <li>• Benin</li> <li>• Comoros</li> <li>• Liberia</li> <li>• Mali</li> <li>• Sierra Leone</li> </ul>

Source: Authors' survey.

The validation process consisted of:

1. An interactive online validation workshop held in January 2021, which was attended by over 32 representatives from FIUs, law enforcement agencies, wildlife authorities and other government agencies across West Africa. Attendees discussed the survey results and how the findings applied to the research questions. The workshop was held in English, French and Portuguese. Participants from 13 GIABA member states attended the event, namely Benin, Burkina Faso, Cabo Verde, Côte d'Ivoire, The Gambia, Ghana, Guinea Bissau, Mali, Nigeria, São Tomé and Príncipe, Senegal and Sierra Leone.
2. A first draft of this paper was provided in English, French and Portuguese to all GIABA member states and three additional independent experts for written feedback prior to publication.

### Terminology

There is no single definition of 'IWT', 'wildlife trafficking' or 'wildlife crime' in national or international law. This paper uses the following definitions.

In line with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), 'wildlife crime' is defined as the taking, trading (supplying, selling or trafficking), importing, exporting, processing, possessing, obtaining and/or consuming of wild fauna and flora, including timber and other forest products, in contravention of national or international law.<sup>16</sup>

16. CITES, 'Wildlife Crime', <<https://cites.org/eng/prog/iccwc/crime.php>>, accessed 16 February 2021.

IWT is defined here as a type of wildlife crime that encompasses actions such as smuggling, trading or trafficking of protected species of flora and fauna, including their parts and products, for financial gain. This paper's definition of IWT includes forest products such as timber, as well as wildlife products such as elephant ivory. Wildlife trade is illegal when it violates domestic law, CITES provisions or any other international treaty.

As a result of the overlap between these terms, wildlife crime and IWT are sometimes used interchangeably. For example, the West Africa Strategy on Combating Wildlife Crime also covers IWT. This paper is solely concerned with large-scale, transnational illegal trade in flora and fauna for financial gain, therefore the authors use the term IWT throughout.

This paper also considers IWT to be a form of 'environmental crime'.<sup>17</sup> The FATF's official guidance suggests countries should ensure 'environmental crime' is a designated predicate offence to money laundering but does not explicitly define what this includes.<sup>18</sup> This means there is no definitive consensus on what constitutes environmental crime. This paper defines it to include IWT in flora and fauna, illegal fishing, illegal mining and waste trafficking at a minimum.

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17. FATF, 'Money Laundering and the Illegal Wildlife Trade', p. 27.

18. FATF, 'Designated Categories of Offences', <<https://www.fatf-gafi.org/glossary/d-i/>>, accessed 16 February 2021.

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# I. Illegal Wildlife Trade in West Africa

**T**HIS CHAPTER BRIEFLY presents what is known about a number of key types of IWT in West Africa, with a particular focus on elephant ivory, pangolin scales and rosewood (*Pterocarpus erinaceus*). These have been chosen because they account for the highest volume of transnational IWT, though other high-value species such as apes and African grey parrots could also have been included. This paper does not aim to provide an exhaustive overview, but discusses high-level findings on how networks trading illegally in these wildlife products organise and operate, drawing attention to corruption as a key enabler of the trade and the role of West Africa as a consolidation, transit and export point in global IWT supply chains. The chapter draws on the UN Office on Drugs and Crime's (UNODC) regional assessment of IWT in West and Central Africa, and the World Wildlife Crime report, published in 2019 and 2020, respectively.<sup>19</sup>

## Regional Trends

Few significant elephant herds remain in West Africa. Most elephant ivory trafficked through the region is sourced from remaining elephant populations in Cameroon, Gabon, the Republic of Congo, the CAR and the DRC.<sup>20</sup> Up to 93% of forest elephant ivory seized internationally between 2006 and 2014 came from the Tri-National Dja-Odzala-Minkébé (TRIDOM) area between Cameroon, the Republic of Congo, Gabon and the Dzanga-Sangha Reserve in the CAR.<sup>21</sup> Smaller quantities originated in Burkina Faso, Benin, Ghana and Côte d'Ivoire.<sup>22</sup> Elephant populations declined by an estimated 70% in the TRIDOM area between 2008 and 2016, mainly due to poaching and habitat destruction.<sup>23</sup> Experts claim ivory sourced as far as East Africa is also increasingly trafficked from West Africa as part of the region's growing transit role for trafficking networks.<sup>24</sup>

Since 2016, the primary exit point for ivory trafficking from Africa has shifted from East to West Africa, with significant displacement from the Port of Mombasa in Kenya to the Apapa Port

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19. UNODC, 'West and Central Africa Threat Assessment', 2019; UNODC, *World Wildlife Crime Report* (2020).

20. Fiona Maisels et al., 'Devastating Decline of Forest Elephants in Central Africa', *PLOS One* (4 March 2013); UNODC, *World Wildlife Crime Report* (2020), p. 14.

21. S K Wasser et al., 'Genetic Assignment of Large Seizures of Elephant Ivory Reveals Africa's Major Poaching Hotspots', *Science* (Vol. 349, No. 6243, 2015), pp. 84–87.

22. *Ibid.*

23. Kimeng Hilton, 'Forest Elephants: Cameroon Loses 70 Per Cent of Its Population', *Cameroon Tribune*, 27 September 2019, <<https://www.cameroon-tribune.cm/article.html/28115/fr.html/forest-elephants-cameroon-loses-70-per-cent-of>>, accessed 23 February 2021.

24. Authors' video interview with a representative of an international NGO, 16 February 2021; authors' video interview with three representatives of an international NGO, 23 February 2021.

Complex and other ports in Nigeria.<sup>25</sup> Nigeria is now the top global point of export for ivory and pangolin scales according to seizure records.<sup>26</sup> Whether originating from West and Central Africa or elsewhere, around 90% of global ivory seizures by weight were destined for China or Southeast Asia between 2005 and 2017.<sup>27</sup> The closure of China's domestic ivory markets in December 2017 has seen significant displacement into neighbouring countries in Southeast Asia, particularly Vietnam, Cambodia and Laos. Vietnam was the destination for around three percent of seized ivory between 2005 and 2015, increasing to 34% between 2015 and 2019.<sup>28</sup>

In recent years, illegal trade in elephant ivory and pangolin scales has converged, with a high number of seizures where the two products have been co-mingled.<sup>29</sup> This is widely attributed to declining global ivory prices, which have seen traffickers switch their attention to the increasingly lucrative market for pangolin scales. In 2019, the NGO Wildlife Justice Commission recorded prices of \$355 per kg of pangolin scales in China, \$350 per kg in Malaysia and \$149 per kg in Vietnam.<sup>30</sup> The unsustainable overconsumption of Asian pangolin species is a major driver of demand for African pangolins (see Figure 2).

Global seizures of pangolin scales increased by nearly 400% between 2015 and 2019,<sup>31</sup> with 54.8% of the total weight of seizures linked to Africa between 2016 and 2019 originating, transiting or destined for Nigeria, followed by Cameroon and the DRC, according to the Wildlife Justice Commission (see Table 3).<sup>32</sup> However, the Nigerian government's official statistics on pangolin seizures are significantly lower.<sup>33</sup> Data collected by the Nigeria Customs Service and the National Environmental Standards and Regulation Enforcement Agency (NESREA) indicate that only 30,286.24 kg of pangolin scales were seized in Nigeria between 2016 and 2019.<sup>34</sup> While there has been no legal international commercial trade in pangolin since all species were put on CITES Appendix I in 2017, growing volumes originating from West and Central Africa are seized each year.<sup>35</sup>

25. Interpol and ENACT, 'Illicit Goods Trafficking Via Port and Airport Facilities in Africa', June 2020, p. 13.

26. UNODC, *World Wildlife Crime Report (2020)*, p. 19.

27. *Ibid.*, p. 52.

28. *Ibid.*

29. *Ibid.*, p. 27; EIA, 'Out of Africa', p. 13.

30. Wildlife Justice Commission (WJC), 'Scaling Up: The Rapid Growth in the Industrial Scale Trafficking in Pangolin Scales, 2016-2019', 2020.

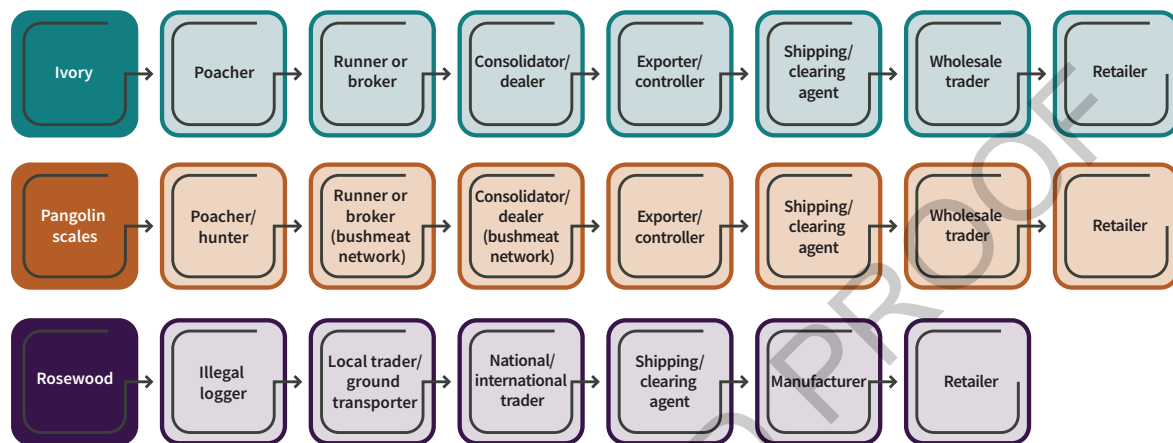
31. C4ADS, 'Tipping the Scales', p. 3.

32. WJC, 'Scaling Up', p. 37. Note that C4ADS's 'Tipping the Scales' places this figure at 64% of all seizures by weight (see p. 27).

33. Authors' video discussion with several representatives of the Nigerian Financial Intelligence Unit (FIU), 29 March 2021.

34. Statistics provided via email by representatives of the Nigerian Financial Intelligence Unit on 25 April 2021.

35. CITES prohibits international trade in Appendix I-listed species except when the purpose of the import is not commercial. See CITES, 'The CITES Appendices', <<https://cites.org/eng/app/index.php>>, accessed 1 November 2020; UNODC, *World Wildlife Crime Report*, p. 65.

**Figure 1:** Types of Actors in the Illegal Wildlife Trade Supply Chain

Source: Author generated. Compiled from examples found in the literature, including UNODC, World Wildlife Crime Report: Trafficking in Protected Species (New York, NY: UN, 2020); Wildlife Justice Commission, 'Scaling Up: The Rapid Growth in the Industrial Scale Trafficking in Pangolin Scales, 2016-2019', 2020; Environmental Investigation Agency, 'Out of Africa: How West and Central Africa Have Become the Epicentre of Ivory and Pangolin Scale Trafficking to Asia', December 2020.

These high prices have seen both subsistence and more organised hunters within bushmeat supply chains tasked to hunt greater numbers of pangolins, which offers the 'opportunity to profit twice from one animal' through the sale of both the meat and the scales.<sup>36</sup> Although pangolins are also consumed for protein or traditional medicine in West Africa, the vast majority are now illegally harvested for their scales for export to China and Southeast Asia.<sup>37</sup> UNODC's interviews with poachers confirm that many are aware hunting pangolins is illegal, but consider it a less serious offence than elephant poaching.<sup>38</sup> In this respect, several interviewees stressed the importance of taking a culturally sensitive and holistic approach to IWT in West Africa, recognising that although the ultimate beneficiaries may be organised crime networks, the poaching economy plays a significant role in livelihoods for rural people too.<sup>39</sup> They stressed the need for the provision of

36. C4ADS, 'Tipping the Scales', p. 57.

37. Boakye et al., 'Knowledge and Uses of African Pangolins as a Source of Traditional Medicine in Ghana'; authors' video interview with a representative of an international NGO, 2 February 2021; WildAid, 'Understanding Urban Consumption of Bushmeat in Nigeria', 2021, <<https://wildaid.org/wp-content/uploads/2021/01/Nigeria-Bushmeat-Consumption-Survey-Report.pdf>>, accessed 6 February 2021; Rachael Bale and Rachel Fobar, 'Pangolin Scale Seizures at All-Time High in 2019, Showing Illegal Trade Still Booming', *National Geographic*, 17 September 2020.

38. UNODC, 'West and Central Africa Wildlife Crime Threat Assessment', p. 64.

39. Authors' video discussion with several representatives of the Nigerian FIU, 29 March 2021; authors' video interview with a representative of an international NGO, 2 February 2021; several



alternative livelihood opportunities and education-focused activities, as well as high-level law enforcement responses such as financial investigations.

Further up the supply chain, there is limited evidence that scales sourced through bushmeat networks are sold or picked up in local bushmeat markets, which suggests that the trade is well coordinated, with bushmeat suppliers directly connected to traffickers who source and consolidate large shipments for export (Figure 1).<sup>40</sup> Almost all experts interviewed suggested this ‘consolidation phase’ remains an intelligence gap.<sup>41</sup> Nonetheless, from the evidence available, it appears scales are either purchased in bulk or collected in smaller piecemeal loads by intermediaries working with bushmeat suppliers until a significant volume is amassed for export.<sup>42</sup> The scales are then passed to a trusted exporter with connections in Asian destination markets or to a corrupt clearing/shipping agent who specialises in the packaging and logistics for trafficking large volumes of illicit goods by sea or air.<sup>43</sup> These actors are important subjects for financial investigation, because they are likely to be connected to other significant figures in the trafficking network.

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interventions at the RUSI–GIABA validation workshop, January 2021.

40. C4ADS, ‘Tipping the Scales’, p. 13.

41. Authors’ video interview with a representative of an international NGO, 16 February 2021; authors’ video interview with a representative of a law enforcement agency, 3 February 2021; authors’ video interview with two representatives of an international NGO, 2 February 2021; authors’ video interview with a representative of an international NGO, 2 February 2021.

42. C4ADS, ‘Tipping the Scales’, p. 14

43. EIA, ‘Out of Africa’, p. 18; authors’ video interview with a representative of an international NGO, 16 February 2021; authors’ video interview with a representative of a law enforcement agency, 3 February 2021; authors’ video interview with two representatives of an international NGO, 2 February 2021; authors’ video interview with a representative of an international NGO, 2 February 2021.

**Table 3:** Volume of Pangolin Scales Linked to African Countries Seized Between 2016 and 2019 (Where Point of Export Was Known)

Recorded Export Country	2016	2017	2018	2019	Total
Nigeria	10,400 kg	13,250 kg	36,557 kg	52,932 kg	113,130 kg (54.8%)
DRC	2,900 kg	6,000 kg	5,600 kg	17,100 kg	31,600 kg (15.3%)
Cameroon	4,670 kg	6,450 kg	2,518 kg	3,100 kg	16,738 kg (8.1%)
Uganda	-	6,000 kg	-	-	6,000 kg (2.9%)
Tanzania	-	6,000 kg	-	-	6,000 kg (2.9%)
Congo	2,900 kg	-	1,800 kg	-	4,700 kg (2.3%)
Côte d'Ivoire	-	3,000 kg	600 kg	-	3,600 kg (1.7%)
Burkina Faso	-	3,000 kg	-	-	3,000 kg (1.4%)
Liberia	-	3,000 kg	-	-	3,000 kg (1.4%)
Ghana	2,100 kg	-	-	-	2,100 kg (1%)
Angola	-	-	895 kg	-	895 kg (0.4%)
CAR	-	-	718 kg	-	718 kg (0.3%)
Benin	-	-	513 kg	-	513 kg (0.2%)
Kenya	500 kg	-	-	-	500 kg (0.2%)
Guinea	500 kg	-	-	-	500 kg (0.2%)

Source: Reproduced from Wildlife Justice Commission, 'Scaling Up', p. 37. Analysis of seizures 500 kg or over.

The illegal harvest and trade of rosewood has also become a major criminal industry in West Africa. Since 2017, West and Central African countries have accounted for approximately 80% of all illicit rosewood exports, with Nigeria, The Gambia and Ghana responsible for over 85% of global illicit trade in *Pterocarpus erinaceus*.<sup>44</sup> Rosewood is in demand for its reddish colour, wanted to produce 'hong mu' furniture principally manufactured and sold in China and Southeast Asia.<sup>45</sup> IWT involving timber can offer higher profits than solely fauna trafficking because of the volumes involved and the fact that the product and its proceeds can be laundered through legal timber supply chains.<sup>46</sup> Recent research also shows a high level of convergence between timber

44. 'Rosewood' is a catch-all trade term used to describe multiple red wood species. This paper refers to *Pterocarpus erinaceus* as rosewood from this point onwards. *Pterocarpus erinaceus* is also colloquially known as 'kosso' in Nigeria, 'vène' in Francophone countries, 'n'guénou' in Mali, 'pau de sangue' in Guinea-Bissau, 'krayie/kpatro' in Ghana and 'keno' in The Gambia.

45. Naomi Basik Treanor, 'China's *Hongmu* Consumption Boom: Analysis of the Chinese Rosewood Trade and Links to Illegal Activity in Tropical Forested Countries', Forest Trends Report Series, December 2015, <<https://www.forest-trends.org/wp-content/uploads/imported/for173-china-rosewood-report-letter-16-0329-hr-no-crops-pdf.pdf>>, accessed 22 February 2021.

46. Interpol, 'Forestry Crime: Targeting the Most Lucrative of Environmental Crimes', 14 December 2020, <<https://www.interpol.int/en/News-and-Events/News/2020/Forestry-crime-targeting-the-most-lucrative-of-environmental-crimes>>, accessed 22 February 2021.

and wildlife trafficking, with timber frequently used as a concealment method for illegal wildlife products and illicit timber extraction sites acting as poaching grounds.<sup>47</sup>

International demand for rosewood has consistently outpaced domestic and international regulation of the trade since 2016. Many West African countries including Sierra Leone, The Gambia, Nigeria and others have some form of (albeit often temporary or changeable) domestic ban on rosewood logging, making the harvesting itself illegal.<sup>48</sup> In addition, *Pterocarpus erinaceus* was listed under CITES Appendix III in May 2016, before being rapidly uplisted to Appendix II in January 2017.<sup>49</sup> The export of an Appendix II species requires a 'non-detrimental finding' (namely, the advice of a CITES Scientific Authority that the proposed action will not harm the survival of a species or its ecosystem role). Very few countries in West Africa have enough information about their rosewood population size, growth rates or local ecosystem services to make this assessment, yet seizure and trade data shows that exports have in fact *increased* since the Appendix II listing.<sup>50</sup> In 2018, CITES temporarily banned Nigeria from trading in *Pterocarpus erinaceus* due to its continued exports without a suitable non-detrimental finding, flagging the role of corruption in enabling this violation.<sup>51</sup>

It is highly unlikely that all of this rosewood originates in the countries from where it is exported in West Africa. For example, The Gambia was the second-highest global *Pterocarpus erinaceus* exporter in 2017, despite the fact that all indigenous supplies are thought to be exhausted.<sup>52</sup> Forestry officials in The Gambia have previously estimated that almost half of all rosewood exported from the country comes from the Casamance area of Senegal.<sup>53</sup> A 2019 analysis suggests that illegal rosewood exports are worth an estimated 10% of The Gambia's GDP, or up to half of its total exports.<sup>54</sup> This represents more than 20 times the total budget of the country's Ministry of Environment, Climate Change and Natural Resources.<sup>55</sup> Likewise, exports from Ghana have previously been supplemented with illegal imports from Burkina Faso, and rosewood is also known to be trafficked into Sierra Leone from Cameroon, among other

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47. EIA, 'Double Impact: The Nexus Where Wildlife and Forest Crime Overlap', January 2021, <<https://eia-international.org/wp-content/uploads/Double-Impact-2020-SINGLE-PAGES.pdf>>, accessed 23 February 2021.

48. UNODC, 'West and Central Africa Threat Assessment', p. 70.

49. Patrick O Waeber et al., 'Uplisting of Malagasy Precious Woods Critical for Their Survival', *Biological Conservation* (Vol. 235, July 2019), pp. 89–92.

50. UNODC, 'West and Central Africa Threat Assessment', pp. 80, 97.

51. CITES, 'Application of Article XIII in Nigeria', SC70 Doc. 27.3.5, 2018, <<https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-27-03-05.pdf>>, accessed 1 January 2021.

52. Charlotte Attwood, 'Rosewood Smuggling in The Gambia: Shipping Firm Halts Timber Exports', *BBC News*, 8 July 2020.

53. UNODC, *World Wildlife Crime Report (2020)*, p. 42; EIA, 'Cashing-In on Chaos: How Traffickers, Corrupt Officials, and Shipping Lines in The Gambia Have Profited from Senegal's Conflict Timber', 2019, p. 3.

54. UNODC, 'West and Central Africa Threat Assessment', p. 41.

55. UNODC, *World Wildlife Crime Report (2020)*, p. 44.

inter-regional IWT dynamics.<sup>56</sup> Mali, meanwhile, has very few forested areas left but nonetheless exported over 80,000 cubic metres of rosewood in 2018, about half a million trees.<sup>57</sup>

The rosewood supply chain is largely controlled by professional timber agents who frequently move between countries in the region in pursuit of new illegal supplies.<sup>58</sup> According to UNODC in Nigeria, these agents pay local community leaders a nominal fee to encourage logging and recruit local people to extract the timber.<sup>59</sup> Like elephant and pangolin poaching, rosewood extraction similarly relies on local, rural people who are paid low amounts compared to the final value of the product (see Figure 1). Data suggests that chainsaw operators are offered around \$8.28 per log, while so-called ‘pushers’ are offered around \$5.52 per log to manually move them to unofficial ‘depots’ established in forested areas, with ‘loading teams’ offered a further \$1.38 per log to put them on trucks.<sup>60</sup> These trucks are then taxed by corrupt actors within local authorities on their way to be processed or containerised ready for international shipping, with these truckers able to provide multiple receipts for these roadside transactions – a potential source of financial intelligence.<sup>61</sup>

The primary illegal exporters of rosewood in West Africa are Asian expatriate traders, some of whom have operated companies in the region for decades.<sup>62</sup> From the data available, it appears individuals with a number of different nationalities are involved in cross-border IWT activity in West Africa. However, those controlling the international export component – and therefore making the most money – mainly appear to be expatriates, primarily of Chinese and Vietnamese citizenship.<sup>63</sup>

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56. *Ibid.*, p. 42.

57. *Ibid.*; France24, ‘Legal Loopholes Allow Endangered Rosewood to be Exported from Mali to China’, 24 February 2020.

58. CITES, ‘Consideration of Proposals for Amendment of Appendices I and II’, CoP17, 2016, p. 10, <[https://cites.org/sites/default/files/eng/cop/17/prop/SN\\_Pterocarpus\\_erinaceus.pdf](https://cites.org/sites/default/files/eng/cop/17/prop/SN_Pterocarpus_erinaceus.pdf)>, accessed 1 January 2021; UNODC, *World Wildlife Crime Report (2020)*, p. 42.

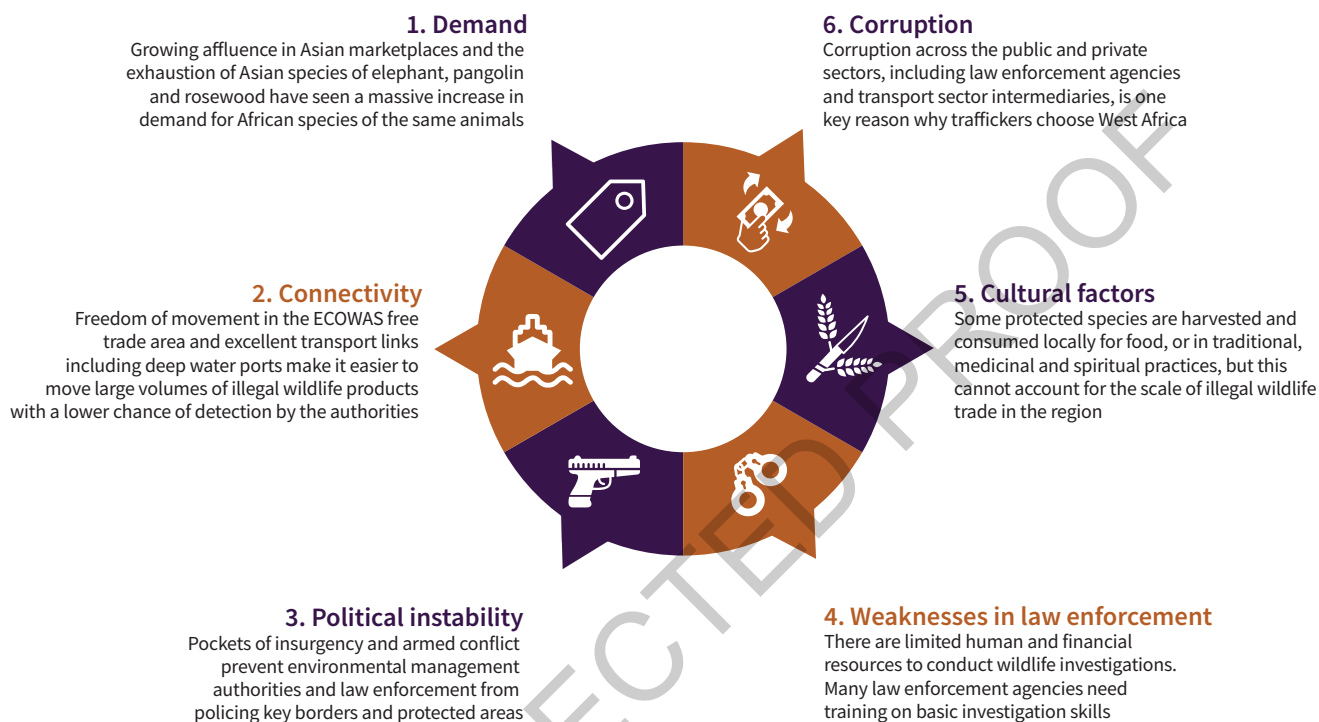
59. UNODC, ‘West and Central Africa Threat Assessment’, p. 72; UNODC, *World Wildlife Crime Report (2020)*, p. 42.

60. UNODC, ‘West and Central Africa Threat Assessment’, p. 76; UNODC, *World Wildlife Crime Report (2020)*, p. 42.

61. UNODC, ‘West and Central Africa Threat Assessment’, p. 76; research teams’ interview with representative of a government agency, Cameroon, 10 October 2020.

62. UNODC, *World Wildlife Crime Report (2020)*, p. 45; UNODC, ‘West and Central Africa Threat Assessment’, p. 77; EIA, ‘Double Impact’.

63. UNODC, *World Wildlife Crime Report (2020)*, pp. 44, 67; authors’ telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021; Interpol and ENACT, ‘Illicit Goods Trafficking Via Port and Airport Facilities in Africa’, p. 7; Ashoka Mukpo, ‘Nigeria Emerges as Africa’s Primary Export Hub for Ivory, Pangolin Scales’, *Mongabay*, 21 January 2021, <<https://news.mongabay.com/2021/01/nigeria-emerges-as-africas-primary-export-hub-for-ivory-pangolin-scales/>>, accessed 23 January 2021.

**Figure 2:** Drivers and Enablers of Illegal Wildlife Trade in West Africa

Source: Author generated.

## The Role of Corruption

The ability to rely on corrupt public and private sector officials is a key reason why traffickers choose to consolidate and transit products through West Africa (see Figure 2). While some corruption appears to be ad hoc, involving relatively small amounts of money and low-level enforcement officials at source sites and land borders, the level of planning and involvement of higher-level officials seems to increase at the consolidation, international transit and export phase.<sup>64</sup> In particular, the practice of misdeclaring species and issuance of fraudulent CITES export permits has been observed in several cases across the region (see Boxes 1 and 2).<sup>65</sup> In 2019, the CITES Secretariat publicly commended the Directorate of Wildlife and Hunting Resources in Côte d'Ivoire for their role in arresting two suspects who allegedly attempted to bribe officials into issuing fraudulent CITES permits for the export of three live Appendix I West

64. OECD, *Strengthening Governance and Reducing Corruption Risks to Tackle Illegal Wildlife Trade: Lessons from East and Southern Africa* (Paris: OECD Publishing, 2018).

65. UNODC, 'West and Central Africa Threat Assessment', pp. 77, 93; Colum Lynch and Siobhán O'Grady, 'New Allegations Challenge the Environmental Record of Top U.N. Official', *Foreign Policy*, 9 November 2017.

African manatees.<sup>66</sup> Yet, notwithstanding similar examples of good practice, multiple local NGO officials interviewed stressed that criminals are often able to bribe their way out of arrests, investigations and prosecutions across the regional supply chain.<sup>67</sup>

Illegal rosewood exports, meanwhile, are often detected through discrepancies between declared national export volumes and official import records in Asian destination countries.<sup>68</sup> In some cases, government officials have even been suspected of using their vehicles to transport or ‘escort’ large volumes of illegal timber from source areas to seaports in the region (see Box 1).<sup>69</sup> Several cases have also documented public officials as owning or controlling timber companies illegally involved in rosewood extraction and export – an important red flag for financial institutions.<sup>70</sup> The use of companies in the forestry sector to trade in illegally obtained timber and launder the associated profit was mentioned by several interviewees.<sup>71</sup> UNODC’s 2019 regional assessment concluded that ‘inconsistencies in the trade data, the observable lack of security around CITES certificates, and the high levels of corruption found among law enforcement in the region’ is the ‘lynchpin issue’ enabling IWT to thrive in West and Central Africa.<sup>72</sup>

The prevalence of corruption also has several indirect consequences for enforcement action. The fear of uncovering high-level corrupt actors can be a major disincentive for even well-equipped agencies to look into the finances of IWT. In other cases, corrupt actors themselves may obstruct or prevent the initiation or progress of financial (and other) investigations.<sup>73</sup> Some experts stressed that what is sometimes identified as a ‘capacity issue’ may be better addressed by understanding the ways in which corruption creates a persistent disincentive for initiating

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66. CITES, ‘Enforcement Matters: Report of the Secretariat’, SC70, 30.1, 2019, pp. 3–4, <<https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-30-01.pdf>>, accessed 28 February 2021.

67. Authors’ video interview with a representative of an NGO, 16 February 2021; authors’ video interview with three representatives of an international NGO, 23 February 2021; in-person workshop meeting with multiple NGO representatives in Nigeria, 29 October 2020; authors’ telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021.

68. UNODC, ‘West and Central Africa Threat Assessment’.

69. EIA, ‘BAN-Boozled: How Corruption and Collusion Fuel the Illegal Rosewood Trade in Ghana’, 2019.

70. CITES, ‘Consideration of Proposals for Amendment of Appendices I and II’, CoP17, 2016, pp. 12–13; EIA, ‘BAN-Boozled’; EIA, ‘Cashing-In on Chaos’, p. 3; EIA, ‘Double Impact’.

71. Authors’ video interview with three representatives of an international NGO, 23 February 2021; authors’ video interview with a representative of a regional FIU, 3 March 2021; authors’ video interview with a representative of an international NGO, 16 February 2021.

72. UNODC, ‘West and Central Africa Threat Assessment’, p. 98.

73. Tanya Wyatt et al., ‘Corruption and Wildlife Trafficking: Three Case Studies Involving Asia’, *Asian Journal of Criminology* (Vol. 13, March 2018), pp. 35–55; authors’ video interview with a representative of a regional FIU, 3 March 2021; authors’ video interview with a representative of a regional FIU, 29 January 2021.

financial investigations in IWT cases across West Africa.<sup>74</sup> In other words, for corrupt officials, the less effective the system is, the more they profit from it.

Corrupt enablers are also particularly important at the shipping stage. A recent report by the Environmental Investigation Agency (EIA), an international NGO, suggests that up to 70% of the fee charged by corrupt clearing agents used by traffickers operating in Nigeria goes to bribing government officials and private transport sector company staff involved in the container clearance process, with these actors reportedly charging around 50,000–100,000 naira (\$131–262) per tonne of illegal wildlife product.<sup>75</sup> Other reports have also documented the abuse of well-known transport companies to ship large volumes of illegal wildlife, including Maersk and Cosco.<sup>76</sup> In July 2020, the Compagnie Maritime d’Affrètement Compagnie Générale Maritime (CMA CGM), the world’s fourth-largest shipping line, banned all timber exports from The Gambia due to high levels of illegal rosewood trade.<sup>77</sup>

Corruption in the private sector is not limited to the facilitation of ground-level consolidation or transportation. Interviewees also flagged a concern that staff in the regulated financial sector may be involved in the illegal trade by helping traffickers open bank accounts or by failing to file STRs, although none could provide evidence of specific instances.<sup>78</sup> Traffickers in Nigeria have previously disclosed to undercover investigators they can transfer as much as one billion naira (approximately \$2.6 million) through their accounts without flagging suspicion.<sup>79</sup>

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74. Authors’ telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021; Alexandria Reid, Rob Parry-Jones and Tom Keatinge, ‘Targeting Corruption and Its Proceeds: Why We Should Mainstream an Anti-Corruption Perspective into “Follow the Money” Approaches to Natural Resource Crime’, Targeting Natural Resource Corruption, Topic Brief, October 2020, <<https://www.worldwildlife.org/pages/tnrc-topic-brief-targeting-corruption-and-its-proceeds>>, accessed 24 February 2021.

75. EIA, ‘Out of Africa’, p. 20.

76. *Ibid.*, p. 17; EIA, ‘Cashing-In on Chaos’, p. 3.

77. Attwood, ‘Rosewood Smuggling in The Gambia’.

78. Authors’ video interview with two representatives of an international NGO, 2 February 2021; authors’ video interview with three representatives of an international NGO, 23 February 2021.

79. EIA, ‘Out of Africa’, p. 20.

**Box 1: High-Level Action Against Corruption in the Illegal Export of *Pterocarpus Erinaceus* from Ghana**

In 2019, a report by EIA claimed at least 540,000 tonnes of rosewood – approximately six million trees – were illegally exported from Ghana to China between 2012 and 2019. It detailed how corrupt officials falsely issued ‘salvage permits’ that allowed companies to continue widespread logging despite the bans. Alongside the CITES Appendix II listing introduced in 2017, the Ghanaian government has issued at least five domestic bans on the export of *Pterocarpus erinaceus* since 2012.

Moving the rosewood from the logging site to Tema port was described as ‘the most difficult part’ of the trafficking. Three main methods were used to guarantee safe passage:

- Paying around GH¢3,000 (\$515) for falsely issued ‘conveyance certificates’ from the Forestry Commission to make the logs appear legitimate.
- Mixing illegal rosewood with other legal timber species to misdeclare the export content.
- Using an illegal ‘escort’, typically a government official or other well-connected person, to travel with the load and guarantee the secure movement to the port.

The report also documented multiple instances where seized logs were illegally reauctioned or released upon payment of a small penalty of GH¢1,500–1,700 (\$300–500).

The report claimed traffickers were able to arrange bills of lading, certificates of origin and CITES permits even retrospectively by exploiting their connections with high-ranking officials.

In August 2019, the Ghanaian government established the Committee to Investigate Allegation of Corruption in Rosewood Trade in Ghana to explore these allegations. The committee presented their findings to the Ghanaian minister for lands and natural resources in January 2020, concluding that although institutional weaknesses exist, no government officials were involved.

Ghana is poised to become the first African country to issue Forest Law Enforcement, Governance and Trade timber licenses under its Voluntary Partnership Agreement with the EU. This would enable importers in the EU to source timber from Ghana without undergoing due diligence in line with EU Timber Regulations, presenting a significant trade advantage. This positive step is threatened by the illegal timber trade.

Sources: EIA, ‘BAN-Boozled: How Corruption and Collusion Fuel the Illegal Rosewood Trade in Ghana’, 2019; Ghana Web, ‘Illegal Rosewood Trade: Ghana to Tighten Monitoring Measures Following Exposé’, 15 February 2020, <<https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Illegal-Rosewood-Trade-Ghana-to-tighten-monitoring-measures-following-expos-867139>>, accessed 13 December 2020.



## A New Era for Counter-Illegal Wildlife Trade Policy in West Africa

Growing international pressure and this exponential increase in the scale of IWT in West Africa has steadily attracted high-level political attention, resulting in the development of the WASCWC (see Figure 3). The strategy was validated by ECOWAS technical experts in June 2020 and is anticipated to be adopted by heads of state in 2021.<sup>80</sup>

The WASCWC provides an unprecedented opportunity for much-needed regional action to combat IWT. Alongside raising basic investigative skills in key law enforcement agencies, this paper suggests that ensuring financial investigations are mainstreamed through the implementation of the strategy is essential. Multiple high-level global UN resolutions, statements, declarations and strategies demonstrate the strength of international consensus on the importance of combating IWT using a 'follow the money' response (see Figure 4).<sup>81</sup> It is therefore very positive that the official Strategic Priorities underlying the WASCWC include the increased use of AML frameworks and financial investigation techniques.<sup>82</sup>

The key components of the strategy are explained here because it is still relatively unknown to many regional stakeholders. As the official WASCWC text will not be available until it is formally ratified, this section draws on material published by the USAID-funded West Africa Biodiversity and Climate Change (WA BiCC) programme.<sup>83</sup>

The strategy's vision is that 'wildlife crime and other related threats, including the spread of zoonotic diseases, are significantly reduced in ECOWAS Member States to improve the conservation of biodiversity for the welfare and socioeconomic development of populations'.<sup>84</sup>

Its core objectives<sup>85</sup> are to:

1. Strengthen institutional responses to combat wildlife crime through training, capacity building and law enforcement.
2. Ensure coordinated national, regional and inter-regional cooperation to combat wildlife crime.
3. Strengthen political commitment towards the eradication of illegal exploitation and illegal trade in wild fauna and flora.
4. Ensure adequate national and regional capacities for the disposal of confiscated specimens.

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80. Authors' video interview with a representative of an international NGO, 2 February 2021; ECOWAS technical experts validated the WASCWC in June 2020, according to WA BiCC, 'West Africa Strategy on Combating Wildlife Crime'.

81. FATF, 'Money Laundering and the Illegal Wildlife Trade'; UN General Assembly Resolution 73/343, 2019.

82. WA BiCC and Directorate of Environment – ECOWAS Commission, 'Combating Wildlife Trafficking in West Africa'.

83. WA BiCC, 'West Africa Strategy on Combating Wildlife Crime'.

84. *Ibid.*, p. 1.

85. *Ibid.*

5. Increase the capacity of source and transit states in the detection of illegally traded fauna and flora.
6. Increase public awareness and community participation and involvement in tackling wildlife crime.
7. Ensure that national and regional laws and policies are harmonised and strengthened for effective CITES implementation.
8. Ensure adequate technical support and financial resources for effective implementation of the WASCWC.
9. Promote partnerships with relevant institutions to strengthen research, monitoring and information sharing.

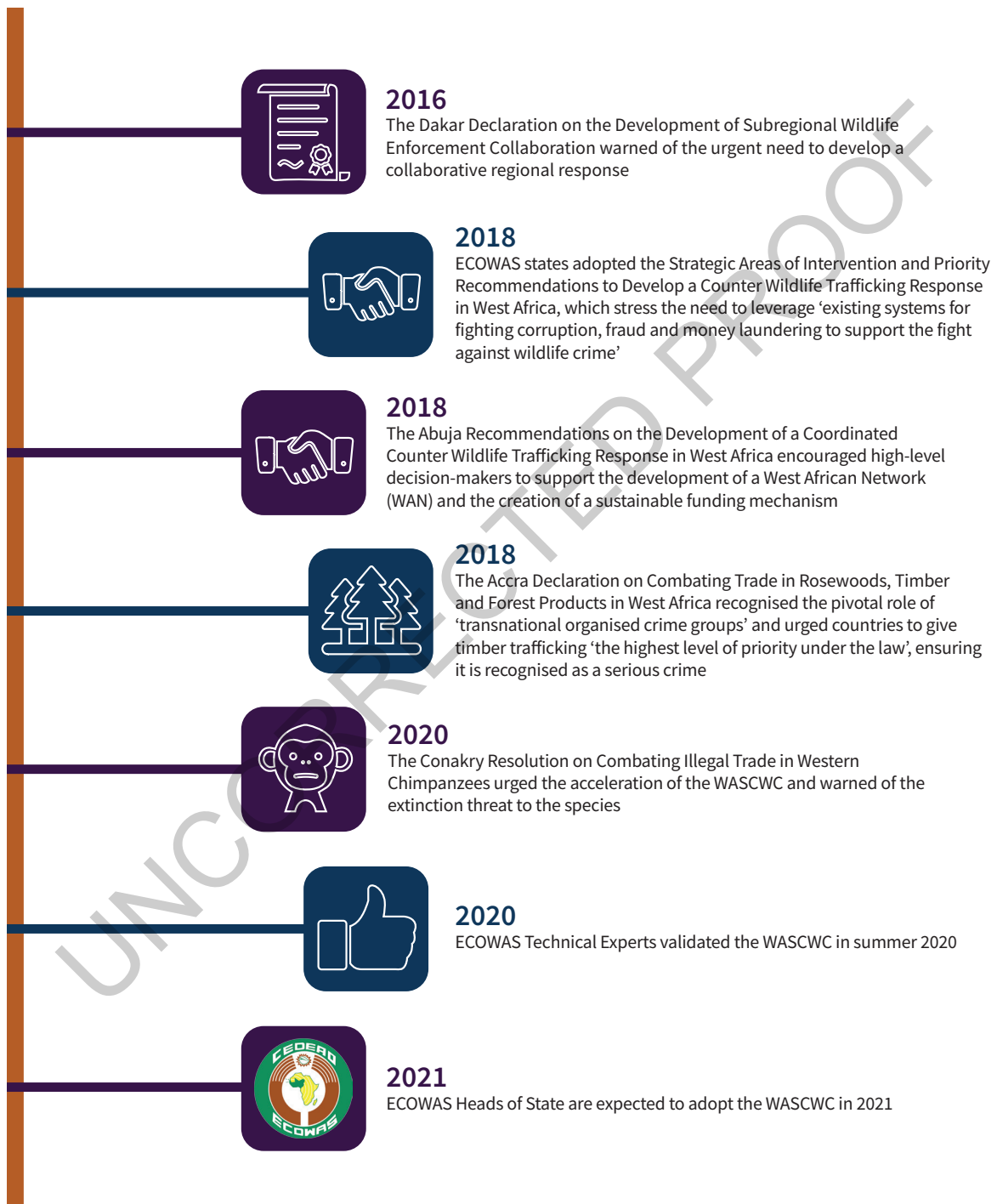
A new West Africa Network to Combat Wildlife Crime (WAN) will be the primary regional mechanism for implementation of the WASCWC. The WAN will institutionalise cooperation to combat wildlife crime by acting as a regional hub for information exchange and providing technical support for training and capacity building across the region. As discussed above, traffickers rely on the ability to move large volumes of illegal wildlife products from source to export countries. Therefore, the WAN will provide the coordination mechanism needed to investigate IWT as a cross-border activity. It will also provide assistance that builds the capacity to use basic investigation skills and techniques in IWT cases – a necessary prerequisite for financial investigations.

The WAN will also provide support to ECOWAS member states to develop national strategies for combating IWT. Moreover, it will help establish ‘action-oriented’ national wildlife law enforcement taskforces. These taskforces will operationalise the WASCWC in each member state and link to the regional level through the WAN. Multi-agency taskforces are needed to increase cooperation and information sharing at the domestic level, which remains insufficient in many countries.

The West Africa Fund for Combating Wildlife Crime will fund the WAN and run on contributions from multiple donors, to be allocated to member states and the ECOWAS Commission through a transparent application process. It will be coordinated by a WASCWC Fund Steering Committee. The fund hopes to leverage \$29 million over five years,<sup>86</sup> a portion of which should be allocated to increasing the use of financial investigations.

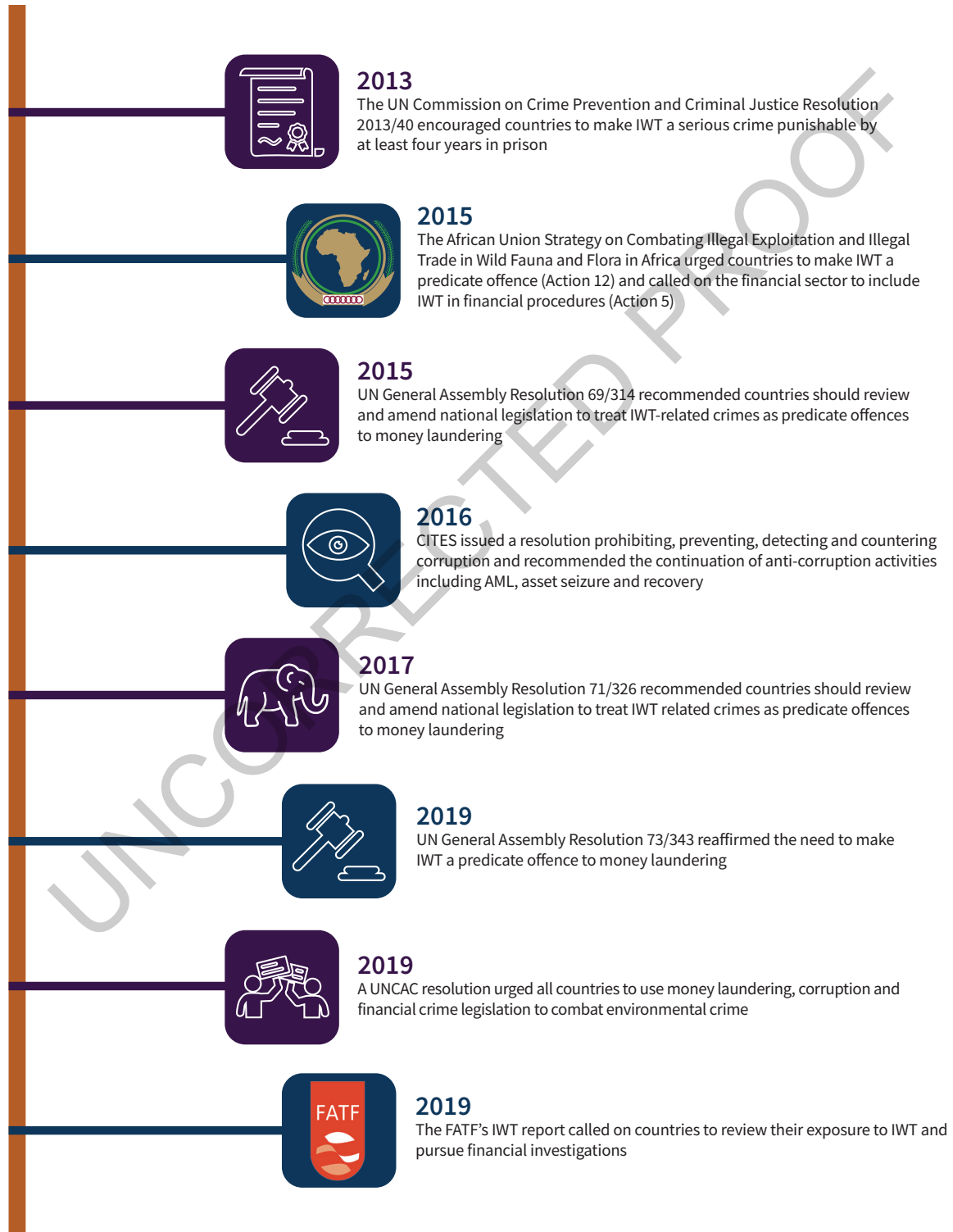
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86. WA BiCC and Directorate of Environment – ECOWAS Commission, ‘Combating Wildlife Trafficking in West Africa’.

**Figure 3: A Changing Regional Policy Landscape**

Source: Author generated.

**Figure 4:** A Changing Global Policy Landscape



Source: Author generated.

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## II. Survey Findings and Case Study Analysis

**A** GAINST THE PREVIOUSLY outlined threat picture and regional policy landscape, this chapter presents the survey and interview data collected for this paper. In September 2020, the authors disseminated a questionnaire to all 17 FIUs in GIABA member states to collect information on the extent to which financial investigations are currently undertaken in IWT cases and to document what FIUs in West Africa believe are the most important challenges that currently prevent such investigations from taking place. Twelve FIUs (equivalent to 71% of GIABA member states) responded to the questionnaire (see Table 2). FIUs were asked to reply by the end of October 2020.

The main findings of the survey are summarised in bold and discussed below. Where relevant, these results are supplemented with qualitative interview data and compared to other similar studies published by the ESAAMLG in 2016, the APG in 2017, the FATF in 2020 and ECOFEL in 2021. This helps contextualise the regional situation in West Africa.

### Survey Results and Discussion

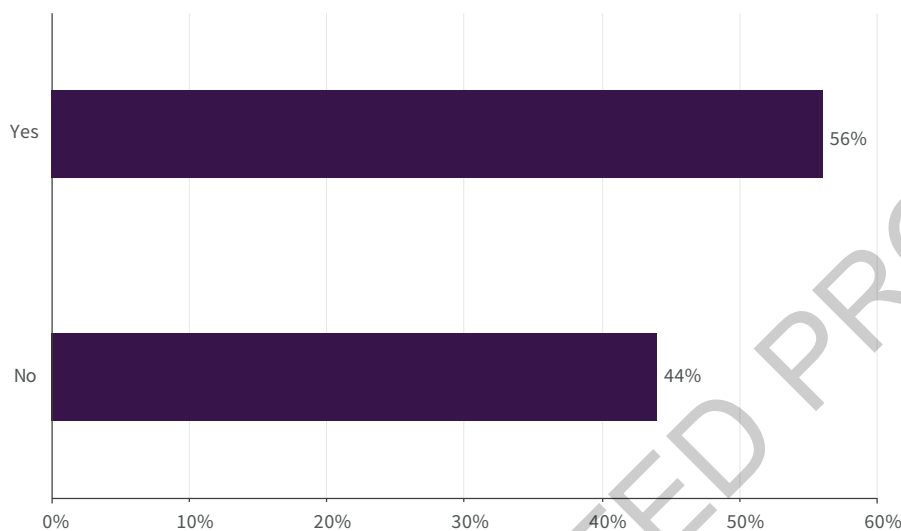
**Of the responding countries, 86% considered IWT a ‘serious issue’, but only 58% included environmental crime in their national money laundering and terrorist financing risk assessments (NRAs).**

Historically, IWT has not been recognised as a major profit-generating enterprise or a serious crime by law enforcement agencies in the region.<sup>87</sup> It is therefore positive that 86% of responding member states considered IWT to be a ‘serious’ issue.

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87. OECD, *Illicit Financial Flows: The Economy of Illicit Trade in West Africa* (Paris: OECD Publishing, 2018), p. 94; broadly confirmed during the RUSI–GIABA validation workshop, January 2021; authors’ video interview with three representatives of an international NGO, 23 February 2021; in-person workshop meeting with multiple NGO representatives in Nigeria, 29 October 2020.

**Figure 5:** The Recognition of Illegal Wildlife Trade and/or Environmental Crime in Responding Countries' National Money Laundering and Terrorist Financing Risk Assessments



Source: Authors' survey.

This self-expressed awareness of the serious nature of IWT, however, was only partially reflected in GIABA member states' NRAs. Of those responding countries that had conducted an NRA,<sup>88</sup> only 58% identified environmental crime as a risk in the NRA itself (see Table 4). Although this is a relatively high proportion compared to some other regions, where environmental crime is rarely mentioned,<sup>89</sup> the quality of analysis in the NRAs for countries that included IWT varied significantly. Many countries were unable to provide a risk rating in their NRAs due to inadequate data or knowledge of the crime type.

Ghana's 2016 NRA, for example, considers IWT, illegal logging, illegal fishing, illegal mining and the illicit trade in hazardous waste to be 'possible money laundering threats', but provides no estimate of the scale of the proceeds or threat level.<sup>90</sup> Likewise, Sierra Leone's 2017 NRA references crimes including deforestation and illegal logging, but notes that 'rulings about these environmental crimes are not easy to come by and the proceeds from these crimes had not been reported,

88. Only two responding countries had not conducted or completed a national money laundering and terrorist financing risk assessment (NRA).

89. ECOFEL's recent analysis of 78 publicly available NRAs concluded only 13% included wildlife crime, although 27% included environmental crime more broadly. See ECOFEL, 'Financial Investigations into Wildlife Crime', 2021, p. 36. It is important to note these 78 NRAs include some from countries in West and Central Africa.

90. Republic of Ghana, 'National Risk Assessment on Money Laundering and Terrorist Financing', 2016, p. 17.

neither had enforcement of the law taken place'.<sup>91</sup> An exception here is Burkina Faso, which rated IWT as a 'high' money laundering threat based on the volume of criminal proceeds.<sup>92</sup>

On the other hand, five of the responding FIUs (42%) stated that their NRA did not include environmental crime. For example, Nigeria's public NRA does not mention IWT or environmental crime specifically, even though it is a predicate offence in Nigeria (see Table 4).<sup>93</sup>

Improving the quality of data and analytical processes used to assess threats such as IWT for inclusion in NRAs is essential to achieving a proportionate and effective risk-based approach. As noted by ECOFEL's 2021 study, 'having a low or non-existent threat perception of environmental or wildlife crime within the NRA may lead to limited financial investigations'.<sup>94</sup> In addition, the regulated private sector uses NRAs to help inform their internal processes and determine their priorities. The inclusion of IWT in Malawi's 2017 NRA has significantly raised awareness among the private sector and domestic law enforcement agencies of the scale and priority of the threat.<sup>95</sup> If IWT is not included in an NRA, financial institutions and other regulated entities may not consider it in their transaction screening or broader know-your-customer procedures. In 2019, the World Bank released a tool to assist countries with the assessment of environmental crime for inclusion in their NRA, a useful instrument for West African countries in the future.<sup>96</sup>

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91. Republic of Sierra Leone, 'National Money Laundering and Terrorism Financing Risk Assessment', 2017, p. 32.

92. GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Burkina Faso', Mutual Evaluation Report (MER), May 2019, p. 2, <<http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsr/GIABA-Mutual-Evaluation-Burkina-Faso-2019.pdf>>, accessed 16 February 2021. Burkina Faso was the only country to respond to the APG, FATF and ECOFEL studies, demonstrating the importance of assessing IWT for inclusion in an NRA for maintaining awareness.

93. Republic of Nigeria, 'National Risk Assessment on Money Laundering and Terrorist Financing', 2016.

94. ECOFEL, 'Financial Investigations into Wildlife Crime', p. 36.

95. Alexandria Reid and Atuweni Agbermodji, 'The Illegal Wildlife Trade: Not Just a Talking Point', Suspicious Transaction Report (a RUSI podcast), 15 February 2021, <<https://rusi.org/multimedia/illegal-wildlife-trade-not-just-talking-point>>, accessed 17 February 2021.

96. World Bank, 'National Risk Assessment Tool Guidance Manual: Module 10 – Environmental Crime Risk Assessment', September 2019, <<http://documents1.worldbank.org/curated/en/473661593369726351/pdf/National-Risk-Assessment-Tool-Guidance-Manual-Module-10-Environmental-Crime-Risk-Assessment.pdf>>, accessed 2 January 2021.



**Table 4:** Analysis of Publicly Available NRAs

Country	Data Source	Details
Burkina Faso	NRA quoted in MER, 2019.*	Wildlife crime is considered one of Burkina Faso's highest-risk proceed-generating crimes, alongside tax and customs fraud, embezzlement of public funds, drug trafficking, illegal foreign exchange, illicit enrichment and gold-related crimes.
Côte d'Ivoire	Forthcoming NRA.	The forthcoming NRA is expected to include IWT as a 'moderately high' threat for money laundering.†
Ghana	NRA quoted in MER, 2016.‡	The NRA notes that 'possible' money laundering threats specific to Ghana include environmental crimes such as illegal wildlife trade, illegal logging, illegal fishing, illegal mining and the illicit trade in hazardous waste, but it does not rate the risk or estimate the size of the proceeds.
Mali	NRA quoted in MER, 2019.§	The NRA mentions 'illegal logging' and 'environmental crime' among the most common predicate offences to money laundering, but does not estimate the size of the proceeds.
Senegal	NRA quoted in MER, 2018; survey response.¶	The MER provides a breakdown of the number of STRs received by the Senegalese FIU in 2017 (sorted by predicate offence), with none received related to environmental crime. The survey response indicated IWT was a 'low' risk at the time of the NRA in 2017, but that this may be upgraded in a future NRA in light of 'the increase in seizures linked to illicit trade in protected species year on year'.**
Sierra Leone	NRA, 2017.††	The NRA mentions illegal logging, poaching in forest reserves, illegal marine exploitation, illegal mining, illegal dumping of hazardous waste and importation of ozone-depleting substances, but suggests not enough data is collected about the proceeds to inform an accurate risk rating.‡‡

Sources: \* GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Burkina Faso', p. 2.

† John Cusack and Tatiana Ekra, 'Financial Crime Threat Assessment: Ivory Coast', *Financial Crime News*, 2020, p. 7, <<https://thefinancialcrimeneews.com/wp-content/uploads/2020/06/Ivory-Coast-Deep-Dive-2020-Pbd-.pdf>>, accessed 24 February 2021; survey response from Côte d'Ivoire.

‡ Republic of Ghana, 'National Risk Assessment on Money Laundering and Terrorist Financing', 2016, p. 17.

§ GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Mali', MER, November 2019, p. 42, <<https://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/GIABA-Mutual-Evaluation-Mali-2019.pdf>>, accessed 15 February 2021.

¶ GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Senegal', MER, May 2018, <<https://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/GIABA-Mutual-Evaluation-Senegal-2018.pdf>>, accessed 16 February 2021.

\*\* Survey response from Senegal.

†† Republic of Sierra Leone, 'National Money Laundering and Terrorism Financing Risk Assessment', p. 32.

‡‡ Ibid.

Note: Unpublished NRAs in countries who did not respond to the survey may also include environmental crime or IWT.

**Only three (25%) responding countries had conducted a financial investigation in an IWT case at the time of the survey in October 2020, meaning 75% of the responding countries had never conducted a financial investigation in an IWT case.**

The survey results show that very few parallel financial investigations have been conducted in wildlife cases in West Africa. Only three responding countries had conducted a single investigation in a wildlife-related case at the time of the survey. Only one country stated that their FIU is frequently consulted during investigations into IWT cases. This means that at least nine countries in the region had never conducted a financial investigation in an IWT case at the time of the survey.

**Figure 6:** Number of FIU Respondents Who Had Carried Out at Least One Financial Investigation in an Illegal Wildlife Trade Case, as of October 2020



*Source: Authors' survey.*

This has changed since October 2020. In March 2021, as part of the validation process for this paper, Nigeria's FIU confirmed they have initiated four IWT-related financial investigations since October 2020. This activity is not captured in the analysis of the survey results for methodological reasons, but this progress demonstrates Nigeria's growing political commitment to combating IWT. In May 2020, the Nigerian FIU established a Natural Environment and Wild Life Trade Crimes Analysis Unit (NEWTCU) to develop typologies, assist other competent national authorities in financial investigations and analyse wildlife-related STRs. Several agencies, including the Nigerian Customs Service and NESREA, which is responsible for enforcing CITES, have now begun to cooperate with the NEWTCU through a national multi-agency taskforce, which offers hope for financial investigations in future cases.<sup>97</sup> In time, the NEWTCU may have lessons to share with other global FIUs about establishing dedicated departments devoted to IWT.

97. Saghir El Mohammed, 'Wildlife Day: Minister Urges Nigerians to Protect Species, Natures', PR Nigeria, 6 March 2020, <<https://prnigeria.com/2020/03/06/wildlife-day-minister-nigerians->

More broadly, without financial investigations and the use of financial intelligence, law enforcement agencies are largely restricted to confiscating wildlife products and arresting low-level, replaceable poachers. This leaves the mid- and high-level criminals who coordinate and profit most from the trade to run high-profit, low-risk trafficking operations. The absence of financial evidence also means that prosecutors are unable to bring charges for money laundering or other financial crimes. This research did not find any prosecutions for money laundering related to an IWT offence in West Africa. This is not surprising as only one of the countries surveyed claimed to use ancillary legislation – such as financial crime, corruption or fraud legislation – to prosecute IWT cases.

Just two countries (17% of the total sample) could provide an example of asset freezing or forfeiture related to an IWT case. These examples included:

1. A cash seizure of CFA 35,000,000 (\$65,000) found at the home of a wildlife trafficker in Togo.
2. A confiscation made in connection with an ivory trafficking case in Burkina Faso in 2015.

In addition, Mali's NRA considers 'illegal logging and environmental crime' among the most common predicate offences to money laundering in the country, with 15,119 individual cases detected between 2015 and 2018.<sup>98</sup> Despite this, only one of these cases led to a successful conviction, resulting in the confiscation of CFA 130,609,030 (\$240,149), although no money laundering offence was charged.<sup>99</sup>

**Almost nothing is known about how the money moves between actors in the regional West African (and broader international) IWT supply chain.**

A lack of financial investigations means that very little is known about how money is moved across the trafficking networks operating in West Africa. All three countries that had conducted at least one financial investigation in an IWT case identified cash as a method of payment. It is unsurprising that actors at the lower end of the supply chain would be paid in cash: the amounts of money earned at this stage of the supply chain are low compared to the final value of the wildlife product. For example, an ape's value may increase by up to 1,000% between source and final destination.<sup>100</sup>

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species/>, accessed 25 September 2020; authors' video discussion with several representatives of the Nigerian FIU, 29 March 2021.

98. GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Mali', p. 47.

99. *Ibid.*

100. Christine Clough and Channing May, 'Illicit Financial Flows and the Illegal Trade in Great Apes', *Global Financial Integrity*, October 2018.

One of the three countries who had conducted a financial investigation also reported the use of hawala.<sup>101</sup> Another of the three countries reported the use of money service bureaus.<sup>102</sup> None of the nine other countries could name a single method of payment used to accrue or launder the proceeds of IWT.

**Table 5:** Payment Methods Identified in the Three Financial Investigations

Financial Investigations	Identified Payment Method(s)
Financial investigation 1	Cash.
Financial investigation 2	Cash and hawala.
Financial investigation 3	Cash and money service bureaus.

Source: Authors' survey.

This is similar to the findings of the ESAAMLG's 2016 report, which concluded that 'information on the illicit financial flows driving the crimes, both on the demand and supply sides is not available, or accessible, or understood'.<sup>103</sup> Likewise, the ECOFEL's 2021 global study found that 'many jurisdictions reported they were unaware of the payment methods used for wildlife crime', with only 19% of responses (17 out of 88) able to identify any related payment methods at all (Table 6).<sup>104</sup>

**Table 6:** Non-Cash Payment Methods Identified in Other IWT Studies

FATF, 2020	ECOFEL, 2021
<ul style="list-style-type: none"> <li>• Cash deposits (concealed as loans and payments).</li> <li>• E-banking platforms (electronic services tied to a credit card or bank account).</li> <li>• Licensed money value transfer systems.</li> <li>• Hawala.</li> <li>• Third-party wire transfers.</li> </ul>	<ul style="list-style-type: none"> <li>• Bank transfers (wire transfers or remittances).</li> <li>• Prepaid cards.</li> <li>• Barter systems (commodities such as cigarettes, minerals, chainsaws).</li> <li>• Virtual assets, such as cryptocurrency.</li> </ul>

Source: ECOFEL, 'Financial Investigations into Wildlife Crime', 2021; FATF, 'Money Laundering and the Illegal Wildlife Trade', June 2020.

101. Hawala is an informal value transfer system based on trust where actors arrange for transfer and receipt of funds or equivalent value and settle through trade, cash and net settlement over a long period of time. What makes them distinct from other money transmitters is their use of non-bank settlement methods.

102. Confirmed in an interview with a representative of the EAGLE Network, Lomé, Togo, 12 September 2020.

103. ESAAMLG, 'A Special Typologies Project Report on Poaching, Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region', p. 10.

104. ECOFEL, 'Financial Investigations into Wildlife Crime', p. 19.

A number of broader studies have further documented highly limited information about payment methods used in IWT in West Africa. Notably:

1. The UNODC noted that international traffickers operating from West Africa, primarily of Chinese origin, sometimes pay brokers for consolidated loads of pangolin scales via wire transfer.<sup>105</sup>
2. A 2018 study by Global Financial Integrity documented the abuse of bank transfers (using HSBC's systems) and money transfer services (through Western Union) in the illegal trade in great apes.<sup>106</sup> Hawala may also have been used (Box 2).

Notwithstanding this limited information, the extent to which money service bureaus, hawala and bank transfers are exploited for IWT in West Africa remains largely unclear. This is a critical knowledge gap that must be urgently addressed by initiating financial investigations in future IWT cases. The details of such investigations should be shared at the regional level via GIABA or the WAN to inform typologies that can be disseminated across the public and private sector, anonymously if appropriate.

GIABA member states should also seek to engage with mobile money operators (MMOs) to assess the extent to which their services are abused for IWT. A 2020 Interpol study flags the likelihood of abuse of MMOs for transferring the proceeds of IWT, particularly to poachers.<sup>107</sup> The use of MMOs has increased exponentially in West Africa, with one in four citizens regularly using such services.<sup>108</sup> A 2016 regional assessment of terrorist financing in West and Central Africa observes that authorities lack the tools to monitor the movement of funds sent via mobile payment methods, despite MMOs being regulated entities.<sup>109</sup>

The large scale and transnational nature of IWT in West Africa, as well as the high value of the products involved, means that it would be impossible for all IWT proceeds to move in cash, particularly from the high-volume consolidation and export point of the supply chain onwards. While the harvesting or poaching phase is often financed through small cash transactions, transferring larger amounts of money from destination to source countries requires contact with either the formal financial system or cross-border informal money service providers.<sup>110</sup>

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105. UNODC, *World Wildlife Crime Report* (2020), p. 68.

106. Clough and May, 'Illicit Financial Flows and the Illegal Trade in Great Apes'.

107. Interpol and ENACT, 'Mobile Money and Organised Crime in Africa', June 2020, p. 37.

108. Nellie Peyton, 'Coronavirus Seen as Trigger for Mobile Money Growth in West Africa', *Reuters*, 1 April 2020.

109. FATF, GIABA and GABAC, 'Terrorist Financing in West and Central Africa', October 2016, p. 32.

110. UNODC, *World Wildlife Crime Report* (2020), p. 121; authors' video interview with a representative of a regional FIU, 29 January 2021; authors' video interview with an international financial institution, 28 January 2021; several country interventions at the RUSI-GIABA validation workshop, January 2021.

**Box 2:** Politically Exposed Person: Ansoumane Doumbouya, Former Head of CITES in Guinea

In 2015, Interpol arrested the former head of wildlife and CITES management authority of Guinea, Ansoumane Doumbouya. Financial intelligence collected and shared by the Eco Activists for Governance and Law Enforcement (EAGLE) Network showed how Doumbouya repeatedly sold fraudulent CITES Appendix I export permits for a range of protected animals, including baby chimpanzees and gorillas. Each permit earned him between \$3,000 and \$5,000. Other permits were issued for rare birds.

The fraudulent permits listed a 'Mr Abdourahamane Sidibe' as the exporter. Financial records showed he received up to \$450,000 in transfers, principally from a Chinese account. Further records show multiple transfers between \$30,000 and \$40,000 from the same Chinese account to the owner of a Guinea-registered business, the Doumbouya Pets Company (no relation with the former).

All individuals involved used their own names and well-known financial institutions who should have detected these illicit transactions, including HSBC, Western Union and Bank of China. Payment references described transactions for 'import animals' and 'airline fees'. These financial institutions are now said to use red flags for similar payment terms and transaction patterns to help flag suspicious activity.

Ansoumane Doumbouya was sentenced to 18 months in prison, but given a presidential pardon in 2017.

There are no registered captive-breeding facilities in Guinea. However, it is estimated that over 130 chimpanzees and 10 gorillas were exported from Guinea to China between 2009 and 2011 alone.

*Sources: Christine Clough and Channing May, 'Illicit Financial Flows and the Illegal Trade in Great Apes', Global Financial Integrity, October 2018, p. 15; David Shukman, 'Arrests "Big Step" in Chimp Trade Battle', BBC News, 9 March 2017.*

**Box 3: A High-Level Financial Investigation Conducted in Côte d'Ivoire**

In 2018, the Transnational Crime Unit (UCT) of Côte d'Ivoire was alerted by the EAGLE Network that an IWT network was trafficking ivory through the country. The UCT subsequently arrested several members of the network and seized hundreds of kilograms of worked and raw ivory, pangolin scales, and leopard teeth and claws.

As a result of these seizures, Côte d'Ivoire's FIU started an investigation on the local and foreign suspects implicated in the case. The FIU identified the suspects using internal databases and requested further information about the case from FIUs in source countries in West Africa and suspected destination countries in Southeast Asia. This led to the freezing of some assets, though the money was eventually returned and no prosecution took place.

In this case, information sharing between the FIU, UCT, EAGLE Network and foreign FIUs led to a successful financial investigation. Although it did not result in a prosecution, this case generated significant financial intelligence that could be used in future investigations.

*Sources: Information directly provided by the FIU of Côte d'Ivoire and Ofir Drori, EAGLE Network. Further details reproduced from ECOFEL, 'Financial Investigations into Wildlife Crime', 2021 and WA BiCC, 'Côte d'Ivoire Threat Assessment', February 2021, <<https://www.wabicc.org/mdocs-posts/understanding-threats-to-west-african-biodiversity-and-linkages-to-wildlife-trafficking-cote-divoire-field-assessment-report/>>, accessed 24 February 2021.*

**Information sharing and cooperation between FIUs and other relevant national agencies is insufficient. Only one FIU considered itself to be regularly consulted by other agencies in relation to IWT cases.**

Only 42% of the responding FIUs reported having knowledge of the existence of some form of domestic-level body to investigate or coordinate counter-IWT enforcement activities. As mentioned already, only one FIU considered itself to be regularly consulted in relation to IWT cases.

Interviewees attributed this to several factors, particularly low levels of capacity within the national environmental management authorities and law enforcement agencies who typically lead or initiate IWT investigations.<sup>111</sup> Several FIUs stressed that they needed these agencies to approach them with cases, either for investigative support or to access sources of financial intelligence such as STRs.<sup>112</sup> Successful parallel financial investigations depend on the investigation of the predicate offence in the first place. Therefore, it is essential that the

111. Authors' video interview with a representative of a regional FIU, 18 September 2020; authors' video interview with representatives of two Nigerian law enforcement agencies, 8 September 2020; authors' video interview with a representative of a regional FIU, 29 January 2021; authors' video interview with a representative of an international NGO, 16 February 2021.

112. Authors' video interview with a representative of a regional FIU, 29 January 2021; authors' video interview with a representative of a regional FIU, 18 September 2020; several country interventions at the RUSI–GIABA validation workshop, January 2021.

implementation of the WASCWC raises capacity across all law enforcement agencies responsible for the investigation of IWT.

Indeed, FIUs are unlikely to be ‘first responders’ in the investigation of IWT cases. This highlights the importance of creating inter-agency taskforces, such as those planned to be set up or supported by the WAN under the WASCWC. FIUs, anti-corruption agencies and law enforcement bodies with financial investigation powers must be included in these taskforces in order to improve cooperation and facilitate financial investigations.<sup>113</sup>

At the same time, FIUs need to be proactive by educating themselves about IWT to ensure that they are able to recognise and monitor for suspicious activity related to IWT, as well as develop typologies to help other public and private sector partners to improve their response. In 2017, the Namibian Financial Intelligence Centre worked with local NGOs and government agencies to produce a typologies report focused on rhino and elephant poaching. The report drew on national seizure data, STRs and offender profiles.<sup>114</sup> In 2020, Australia’s FIU – the Australian Transaction Reports and Analysis Centre – worked with the country’s Department of Agriculture, Water and the Environment to produce a report for the private sector that includes keywords and average values for wildlife products commonly trafficked in Australia, particularly reptiles.<sup>115</sup> West African FIUs could do the same in order to assist financial institutions operating in the region.

**Responding FIUs identified a ‘lack of awareness of IWT as a predicate offence’ as the most important reason financial investigations do not currently occur in IWT cases.**

On average, FIUs identified three main reasons why financial investigations are not currently pursued in IWT cases. These are detailed in Figure 7.

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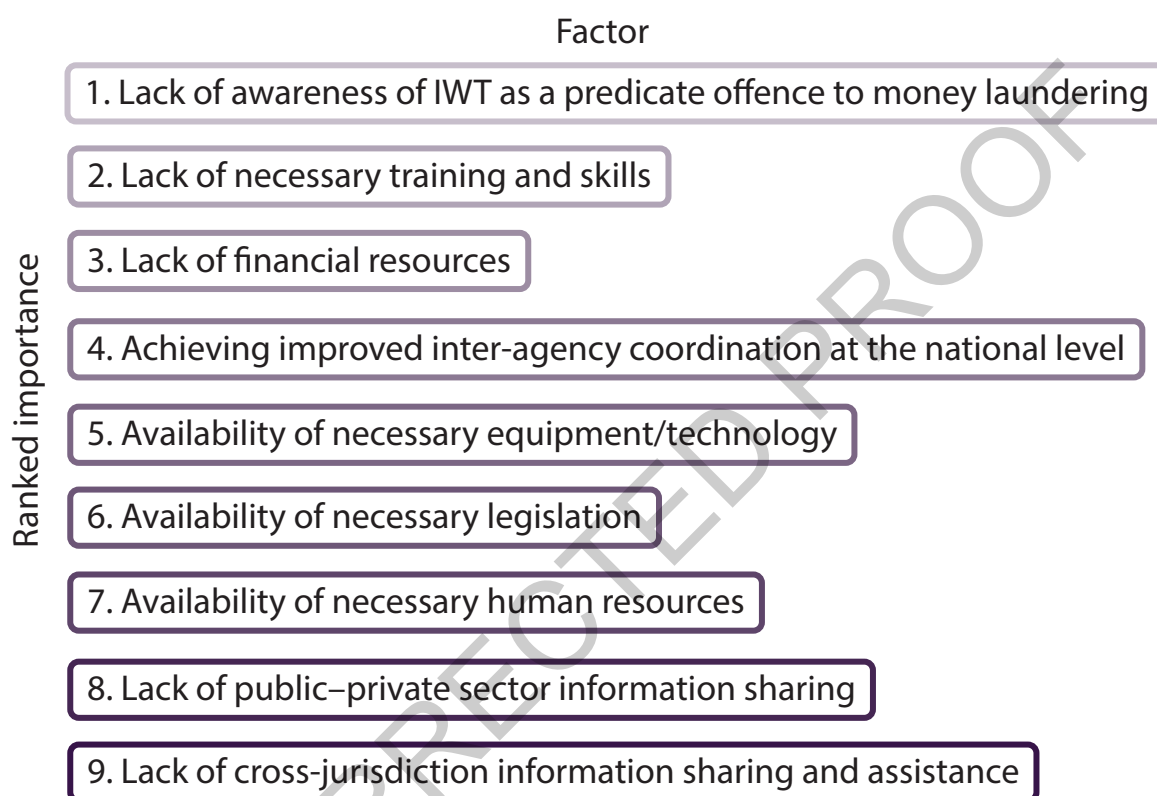
113. Reid, Parry-Jones and Keatinge, ‘Targeting Corruption and Its Proceeds’, p. 3.

114. Republic of Namibia Financial Intelligence Centre, ‘Trends and Typologies Report No 1 of 2017: Rhino and Elephant Poaching, Illegal Trade in Related Wildlife Products and Associated Money Laundering in Namibia’, January 2017.

115. Australian Transaction Reports and Analysis Centre, ‘Stopping the Illegal Trafficking of Australian Wildlife: Financial Crime Guide’, October 2020.



**Figure 7:** The Most Important Challenges Preventing Financial Investigations in IWT Cases, as Ranked by Responding FIUs



Source: Authors' survey.

This finding points to an immediate need for greater capacity building on the financial dimensions of IWT and the ways in which financial crime and other ancillary legislation can be used against IWT networks. This finding was reinforced in the January 2021 validation workshop, at which participants discussed how this lack of awareness affected all levels of law enforcement, from the police and environmental management authorities through to FIUs themselves and the judiciary.

As mentioned above, it is crucial that the agencies most likely to be first responders in IWT cases – such as customs, environmental management authorities and the police – know how to initiate financial investigations and understand the benefits of doing so.

Several stakeholders also observed that prosecutors need to be trained to bring offences under ancillary legislation, including money laundering, tax evasion, smuggling and fraud. These carry much higher penalties than wildlife crime offences such as possession. Very positively, West Africa has a strong legislative basis for combating IWT as a predicate offence to money laundering, with the majority of countries taking an 'all crimes' or designated predicate offence approach that includes environmental crime (see Table 7). Despite this firm legislative basis,

very few MERs scrutinised the extent to which investigations are initiated or convictions are achieved in environmental crime cases (see Table 4). Based on the FATF's recommendations, evaluators need to pay increased attention to environmental crime as part of the assessment process in the future.<sup>116</sup>

**Table 7:** Categorisation of Environmental Crime as a Predicate Offence to Money Laundering in GIABA Member States

Country	Is Environmental Crime a Predicate Offence?	Details
Benin	Yes	'All crimes' approach, including environmental crime and any other crime or offence.*
Burkina Faso	Yes	'All crimes' approach, including environmental crime.†
Cabo Verde	No/unclear	'All crimes' approach, potentially including some environmental crime offences depending on the penalty threshold.‡
Comoros	No/unclear	'All crimes' approach, but the Penal Code does not explicitly include environmental crime or IWT. Comoros' 2010 MER highlighted the need to adopt environmental crime as a designated predicate offence.§
Côte d'Ivoire	Yes	'All crimes' approach,¶ including environmental crime.
The Gambia	Yes	Predicate offence approach, including environmental crime alongside all other FATF-recommended predicate offences, except migrant smuggling and market manipulation.**
Ghana	Yes	Predicate offence approach, including environmental crime alongside all other FATF-recommended predicate offences.†† Some threshold penalty conditions apply.
Guinea	Yes	Predicate offence approach, including environmental crime alongside all other FATF-recommended predicate offences.††
Guinea-Bissau	Yes	'All crimes' approach.§§
Liberia	Yes	Predicate offence approach, including environmental crime.¶¶
Mali	Yes	A national anti-money laundering law criminalises environmental crime.***

116. Tom Keatinge and Alexandria Reid, 'Leading from Behind: The Focus on the Financial Investigation of Wildlife Crime Must be Sustained', RUSI Commentary, 29 June 2020.

Country	Is Environmental Crime a Predicate Offence?	Details
Niger	Yes	A national anti-money laundering law criminalises environmental crime. <sup>†††</sup>
Nigeria	Yes	'All crimes' approach, including environmental crime and all other FATF-recommended predicate offences and any other crime in national law. <sup>†††</sup>
São Tomé and Príncipe	No/unclear	Predicate offence approach, including environmental crime, but it is unclear if IWT offences meet the penalty threshold. <sup>§§§</sup>
Senegal	Yes	'All crimes' approach, including environmental crime. <sup>¶¶¶</sup>
Sierra Leone	Yes	'All crimes' approach, including environmental crime. <sup>****</sup>
Togo	Some offences	'All crimes' approach, including some environmental crime offences depending on the threshold. <sup>††††</sup>

Sources: \* GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: Benin', MER, May 2010, p. 52.

† GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Burkina Faso', p. 149; Article 1(16), Law No 16-2016.

‡ GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Cabo Verde', MER, May 2019, p. 89.

§ IMF, 'Union of the Comoros: Report on Observance of Standards and Codes—FATF Recommendations for Anti-Money Laundering and Combating the Financing of Terrorism', IMF Country Report No. 10/321, October 2010, p. 30, <<https://www.imf.org/external/pubs/ft/scr/2010/cr10321.pdf>>, accessed 1 February 2021.

¶ GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: Cote D'Ivoire', MER, November 2013, p. 40.

\*\* GIABA, 'The Gambia', MER, May 2014, p. 3; GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: Gambia', MER, 18 September 2008, p. 40.

†† GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Ghana', MER, May 2017, p. 112.

††† The MER is inconsistent but it appears that environmental crime is criminalised as a predicate offence. See GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: Guinea', MER, November 2012, p. 28.

§§ UN Conference of the States Parties to the United Nations Convention Against Corruption, CAC/COSP/IRG/I/4/1/Add.60, 28 July 2017, p. 2, <<https://uncaccoalition.org/files/Cycle1-Executive-Summary-Guinea-Bissau.pdf>>, accessed 15 February 2021.

¶¶ Ministry of Foreign Affairs, Liberia, 'Act to Amend the Penal Law Regarding Extortion, Environmental Crime, And Illicit Trafficking in Human Beings and Migrant Smuggling, 2012', 2 May 2013, <<https://www.fiuliberia.gov.lr/wp-content/uploads/2020/07/FIU-2Act-to-amend-the-Penal-Law-extortion-environmental-crime-and-illicit-trafficking.pdf>>, accessed 15 February 2021.

\*\*\* Journal Officiel de la Republique du Mali, 'Loi No. 2016/008, du 17 Mars 2016 portant loi uniforme relative a la lutte contre le blanchiment de capitaux et le financement du terrorisme', p. 3, <<https://www.droit-afrique.com/uploads/Mali-Loi-2016-08-lutte-blanchiment-capitaux-financement-terrorisme.pdf>>, accessed 15 February 2021; GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Mali', p. 42.

†††† Niger Ministère des Finances, 'Rapport d'évaluation nationale des risques de blanchiment de capitaux et de financement du terrorisme', December 2019, p. 31, <<http://www.finances.gouv.ne/index.php/actualites/publications-du-ministere/>>

*file/576-rapport-d-evaluation-nationale-des-risques-de-blanchissement-de-capitaux-et-de-financement-du-terrorisme>*, accessed 15 February 2021.

### Republic of Nigeria, *Money Laundering (Prohibition) Act of 2011 and 2012 Amendment*.

§§§ GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: São Tomé and Príncipe', *MER*, 10 May 2013, p. 42.

¶¶¶ GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Senegal', p. 117.

\*\*\*\* GIABA, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Sierra Leone', *MER*, December 2020, p. 165.

††† GIABA, 'Anti-Money Laundering and Combating the Financing of Terrorism: Togo', *MER*, May 2011, p. 42.

The ability to bring charges under ancillary legislation offers a vital lifeline in a region with generally low penalties for wildlife and forestry offences. A 2018 study suggests that countries in West and Central Africa have an average minimum prison term of two months for wildlife crimes,<sup>117</sup> and an average maximum of five years.<sup>118</sup> Where there is a realistic threat of this alternative legislation being used, this can act as a greater deterrent to current and potential offenders. This points to the importance of all parts of the criminal justice system – including the judiciary – being aware of the fact IWT is a form of environmental crime, and therefore a predicate offence to money laundering.

One interviewee, Ofir Drori, co-founder of the EAGLE Network, also stressed the importance of training law enforcement agencies to request that the court appoint 'investigative judges' or 'examining magistrates' in IWT cases.<sup>119</sup> The EAGLE Network provides intelligence and practical investigative assistance to multiple countries in the region, including Senegal, Togo and Côte d'Ivoire, among others.<sup>120</sup> Their widespread regional experience shows that a lack of knowledge means that offenders in large-scale, complex IWT cases are often tried for minor offences such as possession. Currently, even in cases involving hundreds of kilograms of ivory or pangolin scales, first responders rarely collect financial intelligence at the scene or refer the case to an agency who can conduct a financial investigation.<sup>121</sup> For this reason, particularly in Francophone countries, it is important that law enforcement agencies and the judiciary have standard operating procedures that require them to refer the case to an investigative judge who can call for a suspension while a financial investigation is completed or inter-agency inquiries are made. It is crucial that awareness is raised of this point and that these provisions are routinely enacted.

117. UN Environment Programme, 'Strengthening Laws to Tackle Wildlife Crime in Central, West and Southern Africa', 27 September 2018, <<https://www.unep.org/news-and-stories/blogpost/strengthening-laws-tackle-wildlife-crime-central-west-and-southern-africa>>, accessed 17 February 2021.

118. *Ibid.*

119. Authors' telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021.

120. WA BiCC, 'Combatting Wildlife Trafficking in Senegal', 16 February 2021, <<https://www.wabicc.org/mdocs-posts/combatting-wildlife-trafficking-in-senegal/>>, accessed 23 February 2021; WA BiCC, 'Understanding Threats to West African Biodiversity and Linkages to Wildlife Trafficking: Côte d'Ivoire Field Assessment Report', 11 February 2021, <<https://www.wabicc.org/mdocs-posts/understanding-threats-to-west-african-biodiversity-and-linkages-to-wildlife-trafficking-cote-divoire-field-assessment-report/>>, accessed 24 February 2021.

121. Authors' telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021.

Even where prosecutions are not achieved as a result of a financial investigation, financial intelligence can provide a better understanding of how IWT networks operate, shifting the focus away from individual low-level actors to those higher up the chain. This was the case in a recent financial investigation in Côte d'Ivoire, for example (see Box 3).

Improved sensitisation to IWT as a predicate offence to money laundering could be achieved through historic case reviews of recent seizures or closed cases. This could serve multiple purposes, including the generation of new financial intelligence and typologies, as well as the relationship building necessary for greater inter-agency collaboration in handling future cases. Such exercises are also a practical way of identifying current policy or operational gaps that prevent the initiation of financial investigations (see Box 4), which can then be targeted and remedied.

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**Box 4: The Value of Multi-Agency Reviews of Wildlife Trafficking Cases from a Financial Perspective**

In November 2019, the Department of Forestry Inspection (DoFI), Economic Police and Anti-Money Laundering Intelligence Office (AMLIO, the FIU) in Laos conducted a multi-agency case review of two recently closed IWT investigations.

The cases selected for review were chosen to reflect offences typically confronted by investigators in Laos. Case A involved the seizure of less than 100 kg of ivory, as well as smaller volumes of pangolin scales and rhino horn, from a shop. Case B involved the seizure of less than five kg of ivory, also from a shop.

Elephant ivory is mostly trafficked into landlocked Laos from Vietnam and Thailand.

Illegal ivory products are often sold in Chinese-owned retail outlets to predominantly Chinese tourists, with payment often made with the app WeChat or using a bank card.

The purpose of the multi-agency case review was not to reopen these cases, but to use real examples to:

- Identify missed opportunities for financial action during the original investigations.
- Identify the common financial trends and methods involved in the predicate offence.
- Demonstrate the effectiveness and impact of financial investigations to encourage and support further policy development.
- Explore the role of different domestic agencies in combating IWT as a financial crime, including how to initiate a financial investigation.

The exercise led to a number of practical outcomes, including an agreement that AMLIO should join the Lao-Wildlife Enforcement Network to help support parallel financial investigations and guide the application of relevant Laos financial crime legislation. The creation of a team inside DoFI to coordinate all financial crime investigations and prosecutions relating to the environment was also agreed on. This exercise led the FATF to recommend all countries should conduct IWT case reviews.

A high volume of under-investigated cases means that multi-agency reviews of closed cases or recent large-scale seizures could be highly useful in West Africa.

*Sources: Alexandria Reid and Tom Keatinge, 'Case Closed? Why We Should Review Historic Wildlife Trafficking Cases from a Financial Perspective', RUSI Newsbrief (Vol. 40, No. 2, March 2020); FATF, 'Money Laundering and the Illegal Wildlife Trade', p. 38.*

**A lack of financial resources and skilled personnel available to conduct IWT investigations must be taken seriously.**

It is also important to recognise that FIUs and other relevant law enforcement agencies face multiple competing pressures with regard to the allocation of often scarce resources, including the pressure to prioritise a variety of other predicate offences. Four FIUs ranked 'a lack of financial

resources' in their top three challenges for investigating IWT cases, and several interviewees stressed the importance of increasing resourcing in order to help fund enforcement activities – something that could be delivered directly by donors or through the West Africa Fund for Combating Wildlife Crime when established.<sup>122</sup>

In addition to increased resourcing, more comprehensive training on conducting IWT-related financial investigations was also requested, with several stakeholders suggesting that medium-term mentoring on live cases is more useful than generalised workshops.<sup>123</sup>

**A lack of public–private sector information sharing was not considered a major challenge or priority by FIUs.**

Multiple stakeholders interviewed for this research indicated that more public–private cooperation was needed in the region, but no FIU considered this in their top four priorities for improving financial responses to IWT.<sup>124</sup> This may rise in priority as countries in the region begin to detect and investigate a greater number of cases, which could lead to more requests for financial intelligence about suspects potentially involved. No FIU had conducted a systematic analysis of STRs to look for typologies related to IWT, although the NEWTCU in Nigeria plans to do so.<sup>125</sup>

Overall, there is a need for more awareness around the role and existing record of the private sector in combating IWT in the region, something which could be achieved by establishing a West African regional chapter of the United for Wildlife Financial and Transport Taskforces (see Box 5).

Information sharing with financial institutions and the transport sector is an important component of an effective intelligence-led approach to IWT. Almost all private sector responses to the FATF's 2020 study stressed that identifying suspicious activity related to IWT was challenging without information sharing about IWT trends and modus operandi from the public sector.<sup>126</sup> This is crucial to ensuring that regulated entities are able to actively and accurately monitor and report suspicious behaviour related to IWT. Without granular information, financial institutions

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122. Authors' video interview with a representative of an international NGO, 16 February 2021; authors' video interview with a representative of a law enforcement agency, 3 February 2021; authors' video interview with two representatives of an international NGO, 2 February 2021; authors' video interview with a representative of an international NGO, 2 February 2021.

123. Authors' telephone interview with Ofir Drori, co-founder of the EAGLE Network, 9 February 2021; authors' video interview with two representatives of a law enforcement agency, 3 February 2021.

124. Authors' video interview with a representative of an international NGO, 16 February 2021; authors' video interview with two representatives of an international NGO, 2 February 2021; authors' video interview with a representative of an international NGO, 2 February 2021; authors' video interview with a representative of a private sector financial institution, 28 January 2021; authors' video interview with Sarah Stoner, director of intelligence, Wildlife Justice Commission, 15 January 2021.

125. Authors' video interview with Kelechi Onwuegbule, Nigerian FIU, 29 January 2021.

126. FATF, 'Money Laundering and the Illegal Wildlife Trade', p. 51.

may not be aware of what they should be looking for in relation to IWT as a proceed-generating crime.<sup>127</sup> This is a further reason why the inclusion of environmental crime in NRAs is important.

**Box 5: United for Wildlife Financial and Transport Taskforces**

The United for Wildlife Financial and Transport Taskforces bring together civil society organisations, over 100 transport intermediaries and 44 financial institutions (including banks and mobile money operators) to detect and report illicit financial activity related to IWT.

Private sector members receive alerts about new wildlife trafficking incidents, strategic bulletins and operational details such as the names of offenders.

New transport and financial institutions can join the taskforces, including those with operations in West Africa. Regional chapters already exist in East and Southern Africa meant to facilitate information sharing, networking and relationship building to address IWT.

This paper recommends that United for Wildlife set up a regional chapter specifically for the private sector in West Africa to increase awareness and reporting of suspicious behaviour related to IWT.

*Source: United for Wildlife, <<https://unitedforwildlife.org>>, accessed 9 April 2021.*

**Most FIUs ranked a lack of cross-jurisdiction cooperation and information sharing as the least important priority for improving the financial response to IWT, but this emerged as an important theme in most qualitative research interviews.**

A lack of cross-jurisdiction information sharing and assistance was generally rated the least important reason why financial investigations are not occurring in wildlife cases, despite emerging as a key theme in research interviews.

This finding was discussed at length during the validation workshop. Most participants agreed that international cooperation *is* very important and a significant issue, but viewed domestic cooperation and proper resourcing of key agencies on a national level as more pressing issues. Without this progress at the national level, FIUs noted that financial investigations would not be initiated at all, let alone to the level of requiring international cooperation. As one law enforcement expert put it, 'law enforcement need to get their house in order at home first'.<sup>128</sup>

127. Authors' video interview with two experts from the United for Wildlife Financial and Transport Taskforces, 2 February 2021; authors' video interview with four financial crime analysts at an international financial institution, 18 August 2020.

128. Authors' video interview with a representative of an FIU in Southeast Asia, 28 January 2021.



At the international level, however, several interviewees from NGOs observed that countries in the region work in silos, rarely communicating with each other.<sup>129</sup> Given the direct connections between Central and West Africa as source and transit points, there is a need for GIABA and the Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale (GABAC) to work together to build cooperation and information sharing on tackling IWT from a financial perspective. Such cooperation has been fruitful in other areas, with the two regions producing a joint terrorist financing assessment, for example.<sup>130</sup>

Transcontinental cooperation with destination countries in Southeast and East Asia was considered more difficult. One FIU in Southeast Asia felt that a lack of cooperation was a mutual issue, noting that they had sent requests to West African countries on wildlife cases which were not answered.<sup>131</sup> Several FIUs in West Africa suggested that it was easier to cooperate when both countries were members of the Egmont Group of FIUs, which was held to offer a secure information sharing system and deemed to be more reliable given that countries are required by the principle of reciprocity to offer a response.<sup>132</sup>

Multiple interviewees stressed the need for more opportunities to build relationships with their counterpart law enforcement agencies abroad, perhaps through events and training courses.<sup>133</sup> They noted that some relevant opportunities had been missed, mainly because IWT was not deemed to be a high priority. For example, only two GIABA member states attended an Africa–Asia Pacific Symposium on Strengthening Legal Frameworks to Combat Wildlife Crime held in 2017, as compared to seven countries from ESAAMLG.<sup>134</sup>

Nonetheless, some recent positive examples of international cooperation do exist, such as the extradition of Chen Chengzong and Lin Zhiyong from Nigeria to China in 2018. The case was tried in December 2020, leading to the conviction of 17 ivory traffickers with links to West Africa, with two given life imprisonment for their leading role in the syndicate.<sup>135</sup> Likewise, in April 2020, Senegal extradited Amara Cherif, a Guinean citizen, to the US for his alleged role in facilitating heroin, rhino horn and ivory trafficking. He is now on trial for money laundering and

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129. Authors' video interview with a representative of an international NGO, 2 February 2021; authors' video interview with a representative of an international NGO, 2 February 2021.

130. FATF, GIABA and GABAC, 'Terrorist Financing in West and Central Africa'.

131. Authors' video interview with a representative of a regional FIU, 29 January 2021; authors' video interview with a representative of an international NGO, 2 February 2021.

132. Authors' video interview with a representative of an international NGO, 2 February 2021; authors' video interview with a representative of a regional FIU, 29 January 2021; confirmed during the RUSI–GIABA validation workshop, January 2021.

133. Authors' video interview with a representative of a regional FIU, 29 January 2021.

134. UN Inter-Agency Task Force on Illicit Trade in Wildlife and Forest Products, 'Africa-Asia Pacific Symposium on Strengthening Legal Frameworks to Combat Wildlife Crime', Symposium Report, Bangkok, 4–5 July 2017.

135. *The Star*, 'Smugglers Jailed as China's "Biggest Ever" Illegal Ivory Network Smashed', 2 January 2021.

IWT in the US.<sup>136</sup> These cases demonstrate the outcomes that can be achieved where political will exists. Such successes should be publicly commended so as to reinforce positive action.

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136. US Department of Justice, 'U.S. Attorney Announces Extradition of Kenyan National for Large-Scale Trafficking of Rhinoceros Horns and Elephant Ivory and Heroin Distribution', press release, 25 January 2021, <<https://www.justice.gov/usao-sdny/pr/us-attorney-announces-extradition-kenyan-national-large-scale-trafficking-rhinoceros>>, accessed 24 February 2021.

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# Conclusion and Recommendations

**W**EST AFRICA'S GROWING role as a major transit hub in global IWT supply chains threatens wildlife across the African continent. Extinction now looms for too many indigenous species to justify inaction. Many species sourced or transited through the region are now categorised as endangered or critically endangered, including African forest elephants, African grey parrots and African pangolins, among others.<sup>137</sup> Run by sophisticated, transnational organised crime groups, it is clear that an effective financial response to these profit-driven operations is now urgently required.

Based on a targeted literature review, a formal survey of West African FIUs and 89 semi-structured interviews, this paper finds that FIUs do not currently prioritise IWT as a predicate offence and very few, if any, parallel financial investigations currently take place in IWT cases.

The expected ratification of the WASCWC in 2021 represents a key opportunity to address this situation. Indeed, its ratification would represent an unprecedented show of political will to mobilise a holistic response to countering wildlife crime in the region – including in relation to the use of financial tools. Although financial disruption is just one piece of the puzzle, it is an important one. Financial investigations offer the opportunity to take away the proceeds of wildlife crime from transnational criminal networks, targeting the actual beneficiaries and reducing the disproportionate focus on low-level, replaceable poachers.

To that end, this paper makes a series of recommendations aimed to support West African states to mainstream financial investigations in countering IWT through the implementation of the WASCWC. It does not repeat the important best practices or recommendations made in other papers, such as the FATF's 2020 IWT report or the ECOFEL 2021 study.<sup>138</sup> Instead, it provides a set of recommendations tailored specifically to the policy landscape in West Africa.

## Recommendations

### Regional Bodies

- The WAN Secretariat should establish a target-driven regional financial crime working group to monitor the number of financial investigations initiated in wildlife cases, coordinate capacity-building assistance and champion the involvement of FIUs in assisting wildlife crime investigations.

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137. WA BiCC, 'Conakry Resolution on Combating Illegal Trade in Western Chimpanzees', 2 November 2020, <<https://www.wabicc.org/mdocs-posts/conakry-resolution-on-combating-illegal-trade-in-western-chimpanzees/>>, accessed 24 February 2021.

138. ECOFEL, 'Financial Investigations into Wildlife Crime', 2021.

- The WAN Secretariat should reinforce good practices at the country level by promoting the effectiveness of ancillary legislation, financial intelligence and financial investigations. Press releases could draw attention to successful cases and prosecutions, thereby strengthening collaboration and increasing public support.
- GIABA member states, with the support of the Secretariat, should work together to improve their understanding of the shifting modus operandi, threats and vulnerabilities posed by IWT in West Africa, including during their biannual working group meetings. They should identify and communicate capacity and training needs to the WAN Secretariat and, where appropriate, funds should be mobilised through the West Africa Fund for Combating Wildlife Crime to ensure these are addressed.
- The WAN Secretariat should systematically promote the inclusion of financial investigations and 'follow the money' approaches in IWT cases in the national wildlife crime strategies it helps West African countries to draft and implement.
- FATF-style regional bodies covering key source, transit and destination regions should institute a series of biannual meetings, relationship-building opportunities and information-sharing fora to allow coordination and lesson learning between similar bodies. These should include, at a minimum, GIABA, GABAC, ESAAMLG and APG.
- Assessors involved in the mutual evaluation process should ensure environmental crime is considered and measure progress against IWT as a predicate offence.

### **National Governments**

- Policymakers charged with developing national counter-wildlife crime strategies and action plans should include the requirement to initiate parallel financial investigations in all suitable IWT cases. National strategies should be accompanied by action plans with transparent targets and reporting to evaluate national progress.
- Agencies with the responsibility for producing NRAs should ensure that IWT and environmental crimes more broadly are duly assessed and included. This process should draw on data collected by wildlife management authorities, law enforcement agencies and other relevant government departments, as well as NGOs.
- Those charged with establishing or managing new and existing domestic taskforces should ensure that FIUs, economic crimes police, anti-corruption agencies and other agencies charged with financial investigation and asset recovery are included.
- As a priority, multi-agency taskforces should convene a review of recent seizures or closed IWT cases to generate new financial intelligence and typologies, as well as build the inter-personal relationships necessary for effective inter-agency collaboration in handling future cases.
- The judiciary or public prosecutor's office should organise multi-agency capacity-building workshops to increase awareness of the fact that existing legislation allows for financial investigations, as well as the use of alternative offences such as participation in an organised crime group or smuggling, to prosecute IWT cases. Countries where there is a lack of awareness that IWT is a form of environmental crime and therefore a predicate offence to money laundering should address this as a matter of urgency.

- Training and case-based mentoring should be provided to strengthen cooperative mechanisms between relevant central authorities. This would help to increase capacity to prepare and approve requests for mutual legal assistance.

### **Private Sector Actors**

- The United for Wildlife Financial and Transport Taskforces should establish a West Africa chapter led by local private sector institutions in order to increase awareness and reporting of suspicious behaviour related to IWT. The chapter should consider working in English, French and Portuguese in order to promote inclusion.
- Financial institutions and transport sector companies operating in West Africa should consider joining the United for Wildlife Financial and Transport Taskforces to ensure that they receive intelligence around the regional threat picture. This would improve their ability to effectively mitigate abuse and report suspicious behaviour.
- Financial institutions and transport companies active in the West Africa region should assess their exposure to IWT, training staff to understand risks and use typologies to enable the detection and reporting of suspicious activity.

### **Donors**

- When established, and if subject to accountable governance and transparency, donors should support the West Africa Fund for Combating Wildlife Crime to provide a centralised and regionally led focus point for the dispensation of funds in support of 'follow the money' approaches.
- Based on need, donor agencies should financially support relevant West African countries to conduct an in-depth multi-agency NRA to assess their exposure to illicit financial flows from IWT.

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# About the Authors

**Alexandria Reid** is a Research Fellow in RUSI's Organised Crime and Policing team, where she focuses on environmental security, illicit trade and related illicit financial flows. Alexandria is also Deputy Director of the Strategic Hub for Organised Crime Research at RUSI.

**Mark Williams** is a Research Analyst in RUSI's Organised Crime and Policing team. His research covers a range of topics related to transnational organised crime, including maritime security, environmental security and illicit financial flows.

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