

REPORT

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environmental investigation agency

SECURING CRIMINAL JUSTICE

BEYOND AFRICA

The persistence of wildlife trafficking networks in West and Central Africa

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ABOUT EIA

The Environmental Investigation Agency (EIA) investigates and campaigns against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops. We work to avert climate catastrophe by investigating the criminal trade in refrigerant gases, strengthening and enforcing regional and international agreements that tackle fossil fuels and climate super-pollutants, including ozone-depleting substances, hydrofluorocarbons and methane, and promoting sustainable cooling. We seek to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises.

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SECURING CRIMINAL JUSTICE

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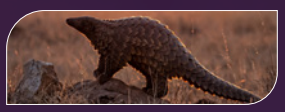
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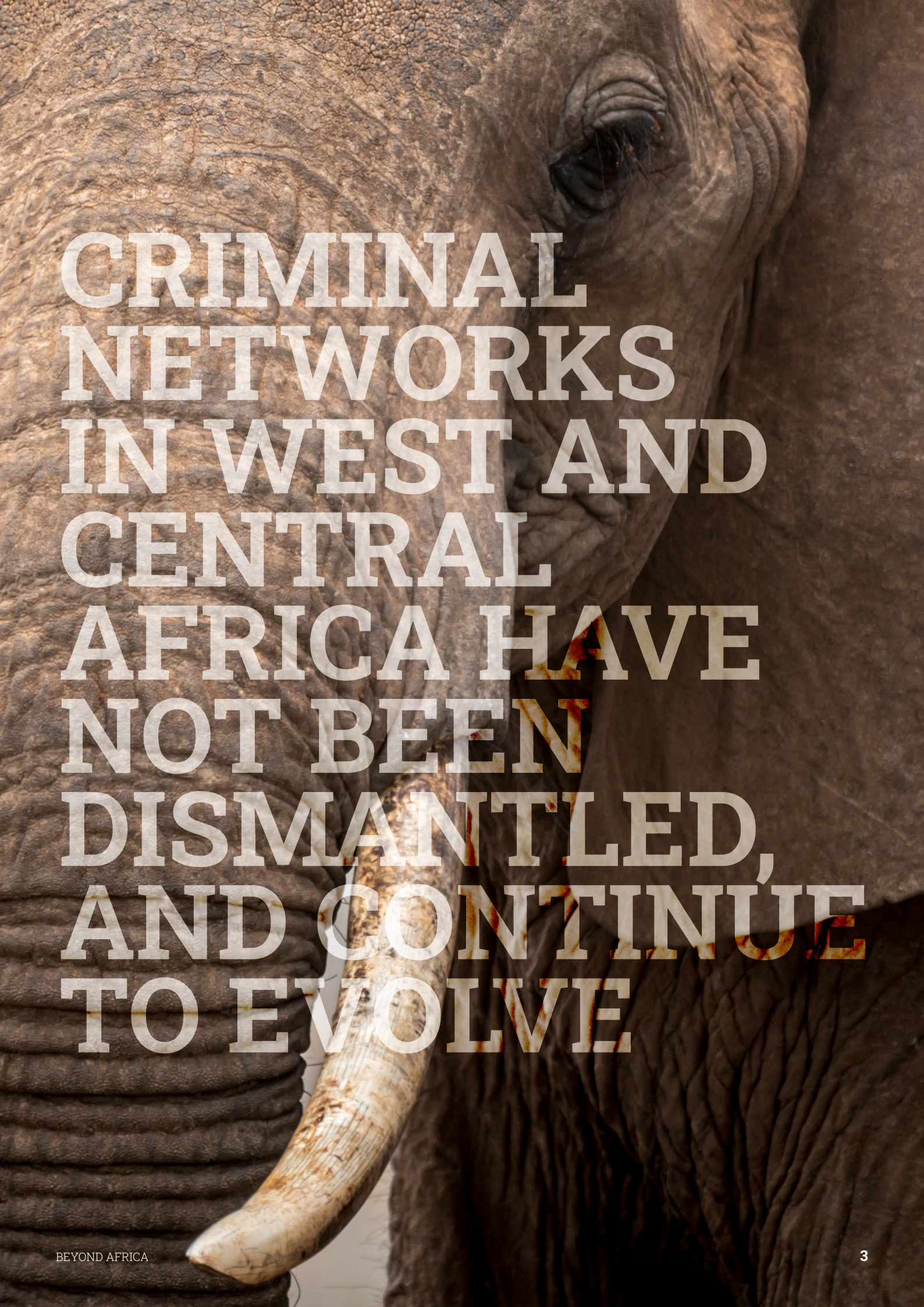
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CRIMINAL NETWORKS IN WEST AND CENTRAL AFRICA HAVE NOT BEEN DISMANTLED, AND CONTINUE TO EVOLVE



Ivory products offered by a vendor at Lekki Arts & Crafts Market, Lagos

EXECUTIVE SUMMARY

The illegal wildlife trade (IWT) centred around West and Central Africa (WCA) remains a serious, organised and adaptive criminal enterprise.

This report — a follow-up to our 2020 Out of Africa findings — presents selective results of six further years of remote, online and field-based undercover investigations into trafficking networks dealing primarily in elephant ivory and pangolin scales destined for Asian markets.

The picture that emerges is one of networks which have not been dismantled but have instead evolved, demonstrating a consistent capacity to circumvent enforcement pressure rather than be deterred by it.

Enforcement in Nigeria and the wider region has visibly improved since 2020. More incidents are being detected, more arrests recorded and more prosecutions pursued. Nigeria's imminent enactment of its Endangered Species Conservation and Protection Bill 2024 — directly addressing the top recommendation of an International Consortium on Combating Wildlife Crime (ICCWC) analytical assessment — represents the most significant overhaul of the country's wildlife protection framework in nearly four decades. These are genuine achievements and the agencies and policymakers responsible deserve recognition.

Yet our findings make clear that improvements in enforcement activity have not translated into the disruption of trafficking networks. Criminals have responded by shifting export locations from Lagos to cities with weaker enforcement presence, such as Port Harcourt and Enugu; adapting concealment methods

and the legitimate products used to disguise contraband; and migrating financial transactions toward bank transfers and underground banking systems as the naira has depreciated. Each time enforcement tightens, traders adapt. The networks persist.

The gulf between interceptions and meaningful judicial outcomes is stark and long-standing. Of 58 wildlife crime incidents recorded in EIA's database [1] which occurred in Nigeria between January 2021 and February 2026,[2] only 12 convictions were recorded. Across WCA,[3] the arrest-to-recorded conviction rate stands at just 10 per cent. Enforcement disproportionately targets low-level, easily replaceable actors — those caught in possession — while the corrupt officials, logistics coordinators and financial beneficiaries who sustain networks at the highest levels continue to operate with near impunity.

This selective accountability is both a symptom and a consequence of corruption, which this report identifies as a structural feature of the trade rather than an exception. Bribery operates along the entire length of the supply chain, from road checkpoints and port scanning officers to senior officials within the Nigeria Customs Service. EIA investigations reveal that at least one prolific trader maintains a senior-level contact who pre-arranges bribes across all relevant agencies before a shipment moves. Even enforcement tools designed to improve detection — such as container scanners, introduced at Onne Port in 2021 — are being circumvented through bribery of the officers who operate them.

Wildlife crime in WCA is also increasingly convergent with drug trafficking, money laundering and financial crime. EIA has identified networks simultaneously involved in synthetic drug trafficking and IWT, with illicit proceeds laundered through real estate and informal value transfer systems. This convergence demands a broader, multi-agency enforcement response which goes well beyond commodity seizure.

Nigeria does not bear responsibility for this trade alone. Ivory and pangolin scales are sourced across Cameroon, the Democratic Republic of the Congo (DRC), the Central African Republic (CAR), Gabon, Chad and the Republic of the Congo before consolidation in Nigeria for export. Transnational coordination, through joint investigations, shared intelligence and reciprocal enforcement, remains critically underdeveloped.

There are genuine grounds for cautious optimism. Strong new legislation, a shift in financial practices which creates new intelligence opportunities and growing recognition of crime convergence all point toward levers which, if pulled with political will and sustained international support, could begin to alter the trajectory.

But the window is narrowing. The species involved cannot wait indefinitely and determined traffickers are not standing still.

KEY FINDINGS

Trafficking networks are resilient and adaptive — not in retreat. Despite improvements in enforcement, IWT is not declining. Traders have responded to pressure by shifting export locations, adapting concealment methods and changing financial practices. Each time enforcement tightens, networks adjust. There is no evidence that current approaches are dismantling them.

Enforcement stalls at the incident — investigations rarely go further. Enforcement remains focused on intercepting goods and arresting those caught carrying them. Post-incident investigation to identify the wider networks is largely absent. Low-level actors are arrested and replaced, while the organisers who profit most are rarely touched.

Transnational investigations and cooperation are failing. Trafficking networks operate seamlessly across borders and enforcement does not. Joint investigations remain rare; intelligence sharing is slow and publicly announcing incidents after the fact actively frustrates cross-border opportunities. Established channels through INTERPOL and the World Customs Organization (WCO) are being significantly underused.

The gap between arrests and convictions is enormous and long-standing. Across WCA, the arrest-to-recorded conviction rate between 2021-26 stood at just 10 per cent. Where convictions do occur, sentencing is often insufficient to deter — EIA documented one convicted trader back in business within months of sentencing and offering tonnes of illegal product.

Corruption is structural, not incidental. Bribery runs the entire length of the supply chain, from roadside checkpoints to senior Nigeria Customs Service (NCS) officials. Enforcement tools are being actively undermined by the very officers responsible for applying them. Without tackling corruption directly, no enforcement improvement will hold.

Wildlife crime is converging with drug trafficking and money laundering. EIA has identified networks simultaneously involved in synthetic drug trafficking and illegal wildlife trade, with proceeds laundered through real estate and underground banking. This demands a broader, multi-agency response that goes beyond wildlife-specific enforcement.



RECOMMENDATIONS

TO NATIONAL LAW ENFORCEMENT AGENCIES

- **Investigate networks, not just incidents.** When wildlife contraband is intercepted, that should be the beginning of an investigation, not the end. Authorities must pursue the wider network behind each incident, identifying the financiers, logistics coordinators and organisers who keep the trade running. Arresting those caught carrying goods has not dismantled a single trafficking network. Post-incident investigation must become standard practice.

- **Conduct financial investigations.** Wildlife trafficking is driven by profit and financial investigation remains the most underused tool available. The growing use of bank transfers, including for bribe payments, creates a real opportunity to trace funds and identify key actors. Economic crime units should be integrated into wildlife investigations as a matter of course, with a mandate to freeze assets and pursue money laundering charges. Real estate holdings linked to known traffickers are a specific priority.

- **Enforce Nigeria's new wildlife legislation.** Nigeria's Endangered Species Conservation and Protection law is a landmark piece of legislation, expanding investigative powers, introducing corporate liability and enabling asset recovery. But a law only functions if it is used. Investigators, prosecutors and judges must be trained and held accountable for applying it. Without that, it changes nothing.

- **Tackle corruption directly.** Corruption is not a complicating factor in the illegal wildlife trade – it is what makes the trade possible. It enables traffickers to move products, evade detection and avoid prosecution at multiple points along the supply chain. Anti-corruption bodies must treat this as a priority. Independent audits of how intercepted goods are handled are essential, given EIA intelligence strongly suggesting that confiscated products are being sold back to traders.

TO INTERNATIONAL PARTNERS

- **Invest in financial investigations.** International funding has long focused on detecting and intercepting shipments. Given how rarely those efforts lead to convictions, that balance needs to shift. Supporting financial intelligence capacity — cross-border asset tracing, training for financial crime units and engagement with banks and money transfer operators — would have far greater impact on dismantling networks.

- **Make transnational cooperation real.** Traffickers operate across borders and enforcement largely does not. INTERPOL, WCO and regional bodies must move beyond information-sharing in principle to joint investigations in practice — across Nigeria, Cameroon, DRC, CAR, Gabon, Chad, the Republic of the Congo and destination countries in Asia. Intelligence sharing must be timely – publicising incidents after the fact actively undermines cross-border investigations. Long-delayed cooperation frameworks, including the Nigeria-Vietnam MoU, must be concluded.

- **Support prosecution, not just enforcement.** The gap between arrests and convictions across West and Central Africa is not a minor inefficiency, it is a fundamental failure of deterrence. International partners should direct more support toward judicial training, prosecution capacity and case tracking and should expect evidence of judicial outcomes, not just interception statistics.





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THEORY OF CHANGE

Combating wildlife crime has too often been measured by what is intercepted rather than what is prevented. Enforcement that focuses on individual incidents, operates within national boundaries and treats corruption as a background condition rather than a primary target will not dismantle the organised, transnational networks driving the trade.

This Theory of Change sets out a different logic, that lasting impact depends on national enforcement, transnational cooperation, prosecutorial effectiveness and anti-corruption reform working together as a reinforcing system rather than in isolation. When these elements are aligned, criminal networks face genuine risk and consequence at every stage of the supply chain, not just at the point of interception.

The goal is an environment in which organised wildlife crime can no longer be conducted with impunity. Without a shared theory of what change looks like, efforts across agencies, governments and international partners risk remaining well-intentioned but ultimately fragmented — producing better statistics without making wildlife safer.

Above: Hoang Van Hao, importer of more than 600kg of ivory from Nigeria, was sentenced to 10 years' imprisonment in Vietnam in 2024.

PROBLEM

- Wildlife crime is organised, transnational and adaptive
- Enforcement is national; criminal networks are not
- Corruption enables trafficking at every stage of the chain

OBSTACLES

- Jurisdictional boundaries limit the reach of national enforcement
- Gaps between agencies and sectors are routinely exploited
- Prosecutions are too infrequent and inconsistent to deter
- Corruption undermines enforcement, cooperation and prosecution from within

ACTIONS

- Strengthen national enforcement capacity and inter-agency coordination
- Build transnational investigative mechanisms so intelligence and jurisdiction can follow criminal networks across borders
- Improve prosecution systems to increase both the frequency and quality of convictions
- Treat corruption as a primary target — embedding anti-corruption accountability within enforcement institutions

RESULTS

- Operational space for wildlife criminals narrows
- Criminal networks face greater risk, cost and consequence at every stage of the trafficking chain
- Prosecutions deliver genuine deterrence rather than isolated symbolic outcomes
- Enforcement gains become more durable and harder to corrupt or circumvent

OUTCOME

- Organised wildlife crime networks can no longer operate with impunity

IMPACTS

- Reduced wildlife trafficking and improved conservation outcomes
- Strengthened governance and enforcement



INTRODUCTION

EIA has been working to address wildlife crime in West and Central Africa for almost 10 years, drawing upon its experience of investigating, exposing and combating wildlife trafficking across the continent.

Long before Nigeria was identified by the international community as a continental hub, EIA was already aware that traffickers had shifted from east to west sub-Saharan Africa as a result of our ongoing remote and field investigations.

Since the publication of our 2020 report Out of Africa, we have continued to conduct remote online research and field-based undercover investigations into the IWT operating in and through Nigeria and the wider region. This report presents the findings of that work, documenting the scale, sophistication and persistence of trafficking networks dealing primarily in elephant ivory and pangolin scales destined for Asian markets.

Despite significant improvements in the response to wildlife crime in the region, the findings are stark – our investigations indicate that trafficking networks have demonstrated a consistent capacity to adapt to enforcement pressure, shifting export locations, concealing contraband and adapting payment methods rather than reducing their operations.

Corruption, long recognised as a major factor in transnational wildlife crime, is not an incidental feature of the trade but a structural one, embedded across law enforcement agencies from road checkpoints to senior customs officials, enabling shipments to move with near impunity. Traffickers tell us that measures to detect smuggling and improve enforcement, such as scanners at ports, are circumvented through paying bribes to operators.



Meanwhile, domestic markets in Lagos and Abuja continue to operate openly, in direct contradiction of Nigeria's own commitments under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and its National Ivory Action Plan (NIAP) process.

Enforcement efforts, although visible in seizure statistics, have produced strikingly few meaningful judicial outcomes. Across WCA, around one in ten arrests results in a conviction. High-level facilitators — the corrupt officials, logistics coordinators and financial beneficiaries who sustain these networks — remain largely untouched while low-level actors bear the brunt of what prosecutions do occur.

Nigeria does not operate in isolation. The ivory and pangolin scales traded through its ports are sourced from across the region — Cameroon, DRC, Gabon, Chad, the CAR and the Republic of the Congo — before consolidation in Nigeria for export. Seizure data across these countries confirms that the trade is a regional problem requiring a regional response. Nigeria cannot, and should not be expected to, shoulder this burden alone. Effective disruption demands coordinated enforcement, shared intelligence and joint investigations across borders.

Furthermore, the traffickers who operate in the region are not solely African. Chinese and Vietnamese networks are heavily engaged in trafficking, facilitating transportation back to Asia where most consumers are based.

We must acknowledge the significant improvements that Nigeria and other countries in the region have made in combating and preventing wildlife crime, but countries cannot become complacent. Determined offenders continue to exploit inadequate enforcement, lack of intelligence exchange and corrupt public officers willing to assist them. Loopholes remain in laws, while the skills and knowledge of enforcement agencies and criminal justice actors require regular updates.

Below we examine our most recent findings, highlighting ongoing challenges of enforcement and prosecutions. Ultimately, however, investigations, prosecutions and justice continue to be undermined by corruption which continues to exacerbate serious, organised wildlife crime in the region.

Above: Ivory and pangolin scales offered by a trader in Lagos.

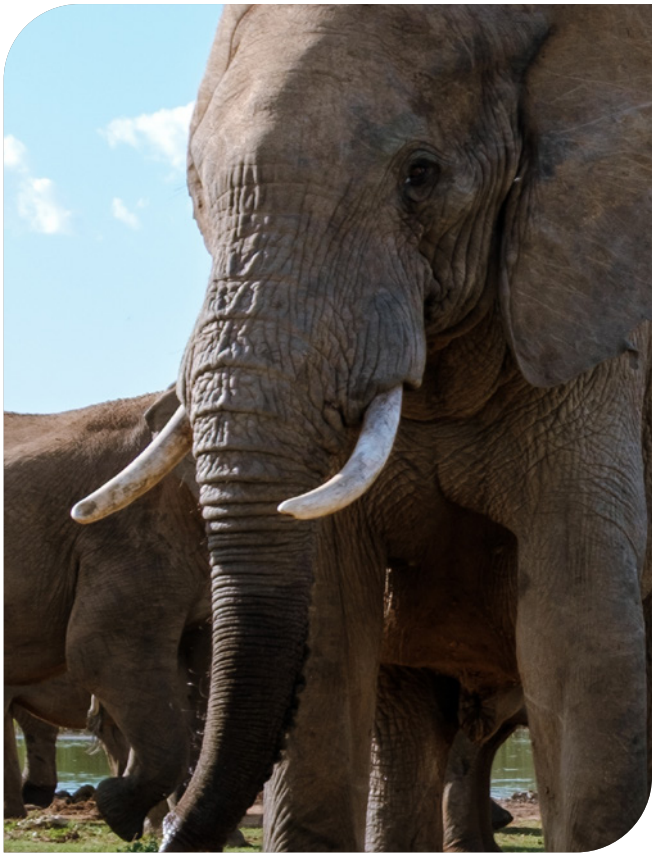


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NATIONAL ENFORCEMENT



Whilst enforcement in Nigeria has improved, questions remain regarding the quality and effectiveness of such responses in tackling wildlife crime long-term.



NATIONAL ENFORCEMENT

It is apparent that enforcement in Nigeria has increased and improved significantly since our 2020 report. EIA's analysis indicates more interceptions of contraband by authorities and more arrests of suspects, along with prosecutions and convictions. The agencies involved should be recognised for these efforts and senior policy-makers and heads of agencies acknowledged for taking steps to address many of the weaknesses identified in our previous assessment.

Nigeria has been bolstered by international support, including reviews of capacity and legislation, and substantial investment in training and mentoring.

However, questions remain regarding the quality and effectiveness of the enforcement response. It remains unclear whether:

- seizures are routinely followed by investigations into the trafficking networks;
- investigations are being conducted into arrested suspects and their associates;
- and prosecutions are producing outcomes capable of disrupting criminal networks.

Perhaps more critically, there is limited evidence that current interventions are generating a sustained deterrent effect capable of preventing future offending.

Above, left: Pangolin scales and ivory concealed in a container ready for export from Nigeria.

INCIDENTS IN NIGERIA

In 2021, EIA intelligence led to a major wildlife seizure in Nigeria, led by NCS. This sparked a series of large-scale seizures[4] and arrests in Nigeria, culminating in 10 tonnes of ivory and 21 tonnes of pangolin scales being confiscated.

EIA's Global Environmental Crime Tracker recorded 80 wildlife crime incidents linked to Nigeria[5] between 2021-26, of which 58 occurred within Nigeria. The majority of these 58 recorded incidents took place in Lagos, home to key air and sea export points, including the country's largest airport, Murtala Muhammad International Airport, where 45 per cent of incidents in Lagos took place.

With the capacity to ship out large volumes of illicit products, Lagos' sea ports saw equally large-scale seizures, including the 2021 seizure of more than eight tonnes of pangolin scales, amongst elephant ivory and other wildlife contraband, from a container destined for Vietnam.

Incidents in Nigeria also reflect the country's role as a consolidation hub as traders prepare batches of illegal wildlife products for export, storing goods in warehouses, homes or rented accommodation across the country. Enforcement action in Nigeria across these recorded incidents resulted in five large-scale seizures in warehouses across Lagos State and Adamawa State, bordering Cameroon. This included a large-scale seizure in 2024 of 7,200kg of pangolin scales linked to a high-level Chinese wildlife trafficker.[6]

Collectively, these seizures, reinforced by EIA's on-the-ground findings, demonstrate how traders exploit the fragmented rule of law and potency of corruption within Nigeria to gather and export large amounts of illegal wildlife products from the region.

WIDER WEST AND CENTRAL AFRICAN CONTEXT

Despite Nigeria's role as a key export hub for illegal wildlife products, the IWT supply chain extends across WCA. EIA data shows that both small- and large-scale seizures took place throughout the region from 2021-26, with illegal wildlife products being most commonly moved via road.

While small-scale seizures may indicate direct local sales to consumers, they may also represent a portion of a wider network at play, consolidating goods along the trade chain prior to export. On the other hand, large-scale seizures are often exclusively connected to transnational criminal operations, involving complex logistics and high-level actors.

As shown in tables 1 and 2, while Gabon had the highest number of recorded incidents between 2021-26, these were mostly small-scale seizures; the total weight of seized IWT products in Nigeria was approximately 37 times that of Gabon.

Nonetheless, other countries in the WCA region did see large-scale seizures, including the 2022 seizure of four tonnes of pangolin scales from a van in Ituri Province, DRC at a border post near Uganda; and in Cameroon where 4,400kg of pangolin scales were seized from a freight truck reportedly enroute to Nigeria in 2021.

These incidents highlight the role of countries across WCA as transit points for products destined for export from Nigeria. Moreover, the movement of large amounts of illegal wildlife products across borders indicates the presence of organised criminal networks operating across the region. Faced with a transnational crime, cross-border collaboration is essential for WCA authorities, sharing intelligence and conducting joint investigations to successfully disrupt IWT networks.

Figure 1: *Incidents in Nigerian States*

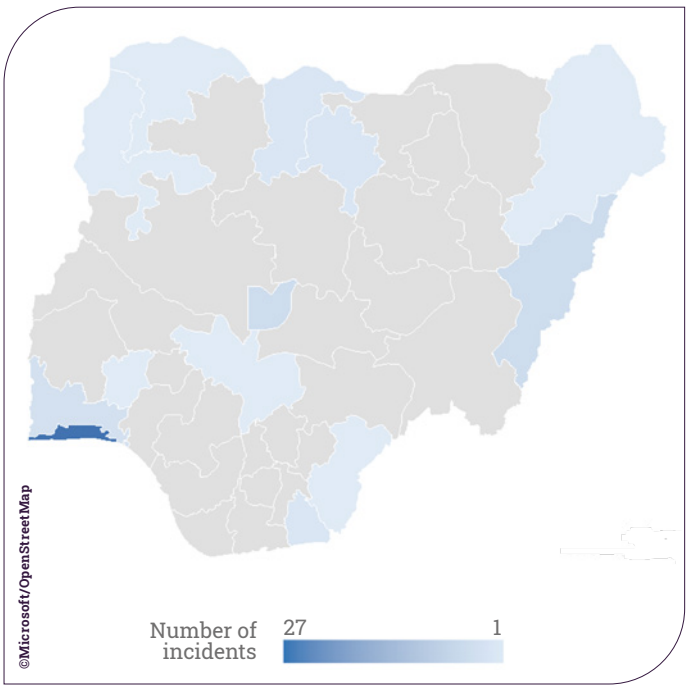


Figure 2: *Incidents across West and Central Africa*

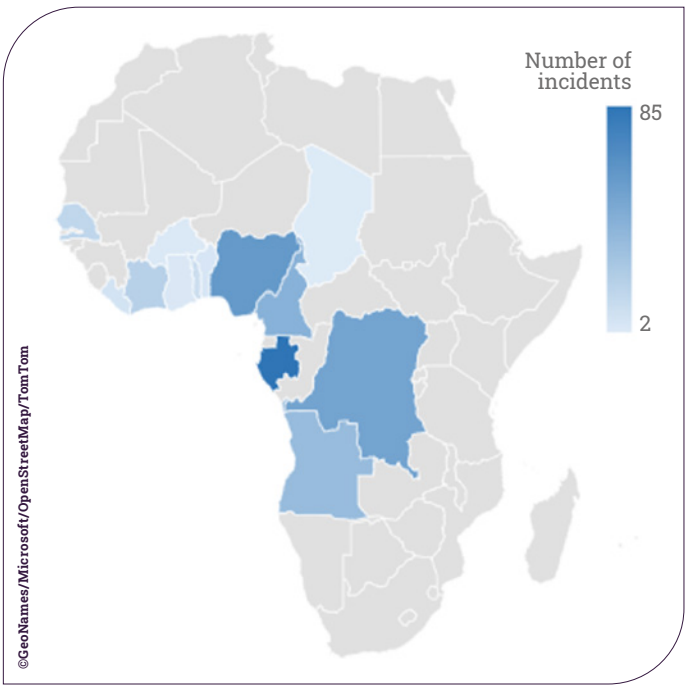


Table 1: *Number of incidents of wildlife crime across West and Central Africa*

COUNTRY	NUMBER OF INCIDENTS
Gabon	85
Nigeria	58
Democratic Republic of the Congo	52
Cameroon	42
Angola	35
Republic of the Congo	32
Côte d'Ivoire	20
Senegal	16
Togo	11
Liberia	7
Benin	5
Ghana	4
Burkina Faso	3
Chad	2
Central African Republic	2
Grand total	**374**

Table 2: *Total reported weight of seized elephant ivory and pangolin scales between 2021-26, including the proportion (%) contributed by each country of the total seized weight in the reporting period. No weight data was available for Ghana and Chad.*

COUNTRY	ELEPHANT IVORY (KG)	% OF ELEPHANT IVORY	PANGOLIN SCALES (KG)	% OF PANGOLIN SCALES	TOTAL ELEPHANT IVORY AND PANGOLIN SCALES (KG)
Nigeria	10,719	55	41,946	67	52,665
Democratic Republic of the Congo	5,024	26	11,608	19	16,632
Cameroon	223	1	6,738	11	6,960
Gabon	1,318	7	94	<0.5	1,412
Liberia	-	-	1,072	2	1,072
Côte d'Ivoire	348	2	713	1	1,061
Angola	1,012	5	3	<0.05	1,015
Republic of the Congo	414	2	182	<0.5	596
Togo	268	1	-	-	268
Burkina Faso	36	<0.5	-	-	36
Benin	28	<0.5	-	-	28
Central African Republic	19	<0.5	-	-	19
Senegal	8	<0.05	-	-	8
Grand Total	**19,418**	**-**	**62,355**	**-**	**81,772**



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SHIFTY BUSINESS



Wildlife crime across WCA is not an isolated conservation issue, but may converge with the drugs trade, money laundering and corruption to form a complex criminal environment in the region.



THE ADAPTING MODUS OPERANDI OF IWT

Trends in IWT observed by EIA since 2020 highlight the resilience and adaptability of these networks in response to law enforcement action, which often fails to significantly deter traders from operating.

Shifts or stagnations in trends underline the need for a more international and collaborative approach to combatting networks by focusing enforcement efforts on key actors across the supply chain, rather than those at lower levels who are easily replaceable. Through focusing on key facilitators, law enforcement efforts can dismantle networks instead of allowing them to circumvent risk by shifts in their modus operandi.

Shifting locations. In recent years, enforcement efforts in Lagos, Nigeria have increased as the city has been identified as an export point for illegal wildlife goods. Such actions have pushed some traders to relocate their operations to areas with weaker law enforcement presence, such as Enugu and Port Harcourt. While one could argue such a shift does indeed represent a disruption of the trade, there is little to indicate that enforcement efforts are sufficiently robust and effective to halt trade and dismantle trafficking networks on a transnational level.

Above, left: Onne Port, a key export point for IWT goods leaving Nigeria.

Above: Pangolin scales concealed inside a wooden box before being loaded into a container for export.



Ivory products offered for sale at a market in Abuja

Shifting packing methods. When traders send out illegal wildlife, they will conceal the goods in products which are consistently traded along the same route, referred to as 'fillers'. These include moringa seeds, cashew nuts, cow horns and ginger. Although the general selection of fillers has remained largely consistent over the years, the filler a trader chooses may change periodically, often dictated by whatever product will raise the least amount of suspicion with law enforcement. Some traders receive such information from their corrupt contacts.

Similarly, the ways in which traders pack their containers to conceal the illegal products also shifts depending on enforcement actions of the time. Recent EIA investigations revealed traders packing pangolin scales in two layers of jute sacks to provide more padding, concentrating the sacks at the centre of a container surrounded by legitimate products such as moringa seeds. This packing method was chosen due to customs officers only checking the packages at the front of the container during inspection.

Despite authorities being aware of the packing and concealment methods used by traders, IWT continues. This raises the question as to what more can be done to increase detections of illicit products within legitimate shipments.

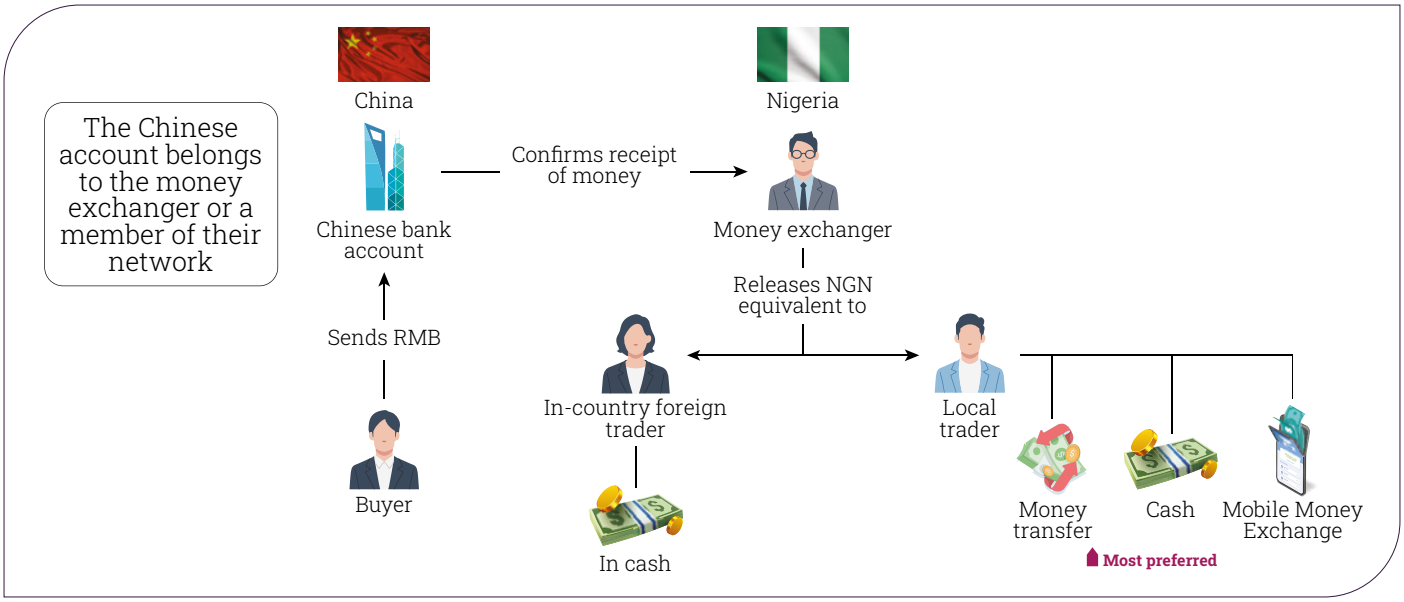
In 2021, scanners were introduced at Onne Port, Port Harcourt, to "modernise Customs operations" and "enhance security".[7] Such scanners should be able to detect wildlife products being smuggled in containers exiting the port, but EIA intelligence reveals that scanning officers can be bribed to let containers avoid the scanners or avoid further problems should the illicit products be detected.

On a broader scale, this example demonstrates how, while looking at improving detection of illicit products at ports, authorities must also work to systematically address key facilitators of the trade, including corruption. Shipping lines and airlines must also act accordingly and in collaboration with the authorities to prevent and detect illegal goods travelling along their routes.

Shifts in payment methods. As the value of the naira has depreciated, cash payments have become decreasingly convenient in Nigeria. In the past two years, EIA has seen an increase in the use of bank transfers between actors within a supply chain, including in the payment of bribes to corrupt officials. Payments made internationally make use of underground banking systems to launder illicit proceeds. This shift in financial trends represents a significant opportunity for law enforcement intervention in 'following the money' across a supply chain and extracting key actors and beneficiaries within the network. Enforcement efforts must be multi-faceted, spanning across both borders and sectors to comprehensively tackle wildlife crime.

Aside from law enforcement agencies, the private sector also has a role to play in tackling wildlife crime. Financial institutions must monitor customer transactions to highlight red flags that could indicate unusual or potentially criminal activity, filing suspicious transaction reports (STRs) to alert the authorities. With the ever-shifting modus operandi of criminals, it is vital that financial institutions maintain up-to-date knowledge on criminals' tactics.

Crime convergence. Wildlife crime across WCA is not an isolated conservation issue, but may converge with the drugs trade, money laundering and corruption to form a complex criminal environment in the region. Embedded within broader organised criminality, the illegal wildlife trade undermines governance and erodes financial integrity. A multi-pronged approach to tackling wildlife crime involves collaboration between law enforcement, private sector and civil society across borders, to ensure that intelligence and best-practice is shared and built upon to drive systemic change.



MONEY LAUNDERING

UNDERGROUND BANKING

Operating on a transnational level, wildlife traders often use money exchangers to receive international payments without the need for any cross-border bank transactions. In this arrangement, the money exchanger acts as an intermediary, facilitating the movement of value between the buyer and the trader.

For example, a trader in Nigeria may inform a money exchanger that they are expecting payment from a buyer in China and require the funds in Nigerian naira (NGN). The money exchanger then provides the buyer with details of a bank account in China into which the payment can be deposited in Chinese renminbi (RMB). This account may be controlled by the money exchanger or by an associate within their network. In some cases, the account is a business account, allowing the transaction to be recorded as payment for goods or services.

Once the payment has been received in China, the money exchanger, or an associate in Nigeria, releases the equivalent value in naira to the trader. The funds may be transferred to the trader's personal or business bank account or provided in cash. As a result, value is transferred between the buyer and trader without a direct international transfer occurring between them.

REAL ESTATE

A 2024 report published by the Economic and Financial Crimes Commission (EFCC) in Nigeria identified real estate to be of medium- to high-risk for money laundering.[8]

In February 2026, EFCC issued a further statement, noting with "grave concern" the trend of criminals funnelling illicit proceeds through real estate.[9] EIA investigations have found that wildlife traders are among those exploiting this money laundering tactic, purchasing real estate both in Nigeria and abroad.

Focusing enforcement on commodity seizures overlooks the abuse of the financial systems that sustain criminal activity. Real estate markets and cross-border laundering networks represent critical points for disruption.

In recent years, Nigeria has strengthened its anti-money laundering (AML) and anti corruption frameworks, including enhanced legislative reforms recognised by the Financial Action Task Force (FATF) in 2025. These developments represent a positive step towards addressing systemic vulnerabilities. However, criminal networks continue to exploit trade finance, informal value transfer systems and weaknesses in non-financial sectors such as real estate.

EIA continues to share intelligence with relevant Nigerian authorities to assist in identifying and disrupting high-level actors exploiting the financial system.

DRUGS TRADE

The trade in synthetic drugs is rapidly expanding across WCA, increasingly devastating local communities, particularly the youth. Nigeria remains a key transit and destination hub for synthetic substances, with the Global Initiative Against Transnational Organized Crime (GITOC) reporting a surge in tramadol and codeine imports in Nigeria in 2025.[10]

EIA has identified two wildlife networks involved in the synthetic drugs trade in Nigeria. One large-scale trader in these networks is alleged to have strong connections with high-level Nigerian officials. Although the extent of the officials' involvement in the wildlife or drugs trade is unconfirmed, such corrupt connections are likely to provide protection for the trader's illicit activities.

The convergence between IWT and the synthetic drugs trade reflects how environments that foster illicit activity are exploited by criminal networks in multiple ways, with consequences not only for wildlife but also for communities and broader state security.



CRACKS IN THE CHAIN



With shipments crossing through multiple jurisdictions, building a complete picture of the key actors across a shipment's supply chain requires transnational cooperation.



Pangolin scales and ivory concealed in timber container seized at Apapa port

Those exporting wildlife from Nigeria conceal their involvement by using cover companies or altering the Bill of Lading (BoL) to obscure the true origin or destination country.

Traders distance themselves from the successful import of illicit goods on the buyer's end of the trade chain, where a separate network of actors is often at play. With shipments crossing through multiple jurisdictions, building a complete picture of the key actors across a shipment's supply chain requires transnational cooperation, which even the agencies themselves accept is lacking.

A regional roundtable hosted by EIA in 2025 between Nigeria, Cameroon and the Republic of the Congo revealed challenges of responsiveness to requests for information despite the potential to use both informal channels and established ones, particularly INTERPOL and the WCO. Transnational crimes demand a transnational response. An MoU between Nigeria's Ministry of Environment and Vietnam's Ministry of Agriculture and Environment, which aimed at strengthening cooperation between these two trafficking hubs, has been pending for several years. The first draft of the MoU was prepared by Vietnam in late 2022 and subsequently shared with Nigerian counterparts for review. Progress has reportedly stalled due to changes in Nigeria's administration and leadership since 2023, despite continued efforts by Vietnam to advance the process.

Other key gaps revealed by EIA analysis include the financial aspects of wildlife crime, emphasising that this is a financially motivated crime driven by the simple economics of sourcing a product at little cost and selling it downstream at increasing levels of profit. Each node involves a financial transaction directly related to the commodity being trafficked, along with other costs such as packing materials and shipping costs. The cost of paying bribes to corrupt public officials should also not be overlooked. Even with this arguably obvious observation and countless pledges to 'follow the money', we find financial investigations to be lacking, despite positive engagement of financial intelligence units, economic police and the private banking sector.

Greater attention should be paid to exploring the convergence of wildlife crime with other forms of crime, along with common elements not specific to wildlife crime such as exploited border crossings, money laundering and corruption. An integrated, multi-agency approach, including departments with mandates that go beyond environmental issues, is essential yet understandably, impeded by competing priorities.



A large quantity of ivory offered by a trader in Lagos



Pangolin scales offered for sale at a market in Abuja

THE VALUE OF PROSECUTIONS

For many years, Nigeria was infamously unsuccessful in bringing wildlife traffickers to justice.[11] That has changed in recent years, with noticeably more arrests and prosecutions – and convictions.

Yet despite Nigeria continuing to be a significant hub for IWT,[12] incident data highlights a significant gap between enforcement activities and meaningful judicial outcomes. While seizures and arrests demonstrate that illegal wildlife trafficking is being identified and disrupted, the low conversion rate from arrests to prosecutions raises important questions about the effectiveness of current enforcement efforts, which indicate a low level of post-incident 'whodunnit?' investigations where the offender is unknown.

Another concern, identified through EIA's in-court monitoring of cases, is the outcome of prosecutorial processes, specifically court hearings. Trials are rare, perhaps because defendants are invariably limited to those caught red-handed, which means evidence is rarely heard, let alone tested. Guilty pleas are also common, which allows the opportunity for bargains to be gained. In July 2023, four defendants convicted at Lagos Federal Court of trafficking pangolin scales and ivory tusks were offered the option of six years imprisonment or paying a fine.[13] They chose the latter – and were flying out of the country just days later.

EIA continues to work with authorities to identify and address factors affecting prosecutorial outcomes, which may include corruption, limited investigative knowledge and enforcement capacity, weak legal frameworks and lack of interagency collaboration.[14,15,16] Wildlife crime is also viewed as low priority in comparison to other security and governance challenges, so may be allocated limited enforcement resources.[17] In relation to the 58 wildlife crime incidents recorded in Nigeria between 2021-26, 22 resulted in the arrest of a total 72 suspects. Of these, 19 were charged across six incidents, resulting in 12 recorded convictions across four incidents. This shows only 18 per cent of recorded incidents involving arrests in Nigeria have recorded convictions, highlighting a significant gap between arrests and completed judicial outcomes.

Although this only includes recorded wildlife crime incidents since 2021, earlier analysis shows that between 2010-21, authorities in Nigeria intercepted 63 illegal wildlife shipments, where only 11 led to court cases and none resulted in jail time, highlighting this low conversion rate as long term pre-existing issue.

This low conversion rate and the ongoing level of wildlife crime suggests current enforcement strategies are only leading to surface level disruption of organised trafficking networks, with minimal impactful long-term change.

Recorded incidents in WCA show 685 arrests from 2021-26, resulting in at least 69 convictions, translating to only a 10 per cent conversion rate from arrests to convictions. Recorded data also shows that 23 Asian nationals, mostly



Vietnamese, were arrested; however, records show only four of these perpetrators were convicted.

Limited resources available to enforcement and judicial agencies, as well as political barriers, contributes to selective prosecution across WCA by creating prosecutorial inequalities. As a result, economically vulnerable local actors, often nationals of WCA countries, undergo heavier judicial processes, while middle- to high-level actors, including transnational organised crime figures and corrupt facilitators, remain comparatively protected from the same accountability.

This selective enforcement against low level actors leads to less meaningful impact as they are easily replaceable, so removing them is not as disruptive to criminal networks as would be the removal of higher-level actors from an IWT supply chain. As well as limiting long-term disruption, this enforcement model also creates a weak deterrent effect on middle- to high-level actors.

The failure to consistently follow financial trails, due to limited resources, also diverts attention from the illicit financial tactics which sustain trafficking networks. Prioritising financial investigations would enable authorities to identify and target the less replaceable higher-level actors who coordinate logistics, manage profits and facilitate corruption to establish protection mechanisms.

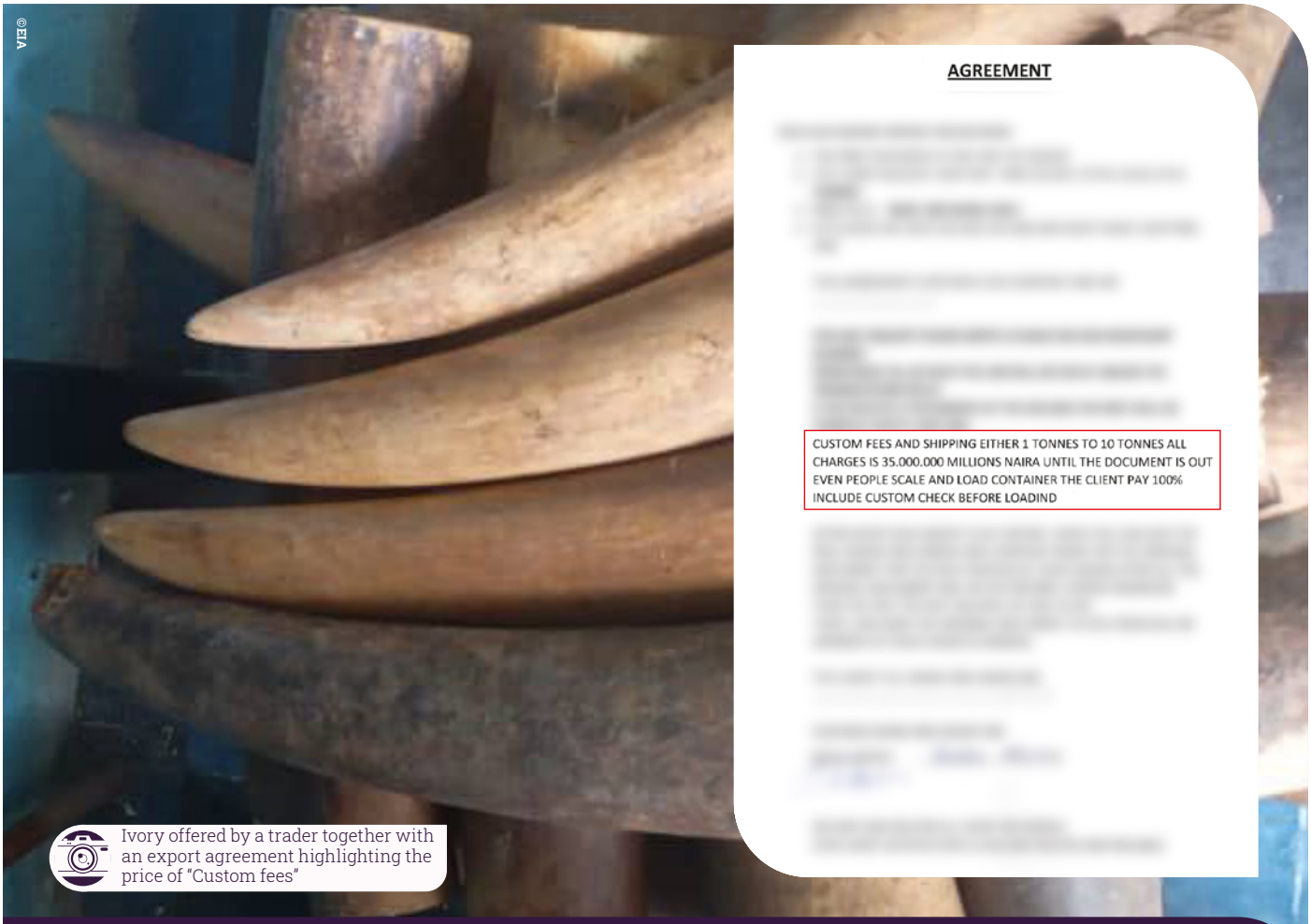
Strengthening financial investigative capacity, enhancing interagency and cross-border collaboration, as well as reducing political interference, are therefore essential to producing more equitable prosecutions across criminal hierarchies, as well as achieving meaningful and sustained disruption of IWT networks.

Despite known limitations within judicial systems in WCA, the incompleteness of publicly available incident data limits its reliability when used for estimating wildlife crime prosecution rates. Public reports often only document the actual seizure event but may not include follow ups on any subsequent prosecution outcomes. This reporting of incomplete stories creates an information gap which distorts the true conversion rate from arrest to prosecution.

Obtaining court case information to follow up on reported seizures to complete the story is also challenging, with the lack of centralised databases or electronic court case documents adding to the difficulty of collecting prosecution data. Reporting rates may also vary across different agencies as journalists may be driven by competing priorities, often influenced by local political and socio-economic climates. The rate of reported seizures is subject to national law enforcement efforts and effectiveness, as well as law enforcement efforts in publicising incidents and the national media interest in reporting on incidents.

Data limitations extend beyond gaps caused by incomplete media reporting. Even if complete stories are available, data collection efforts might be focused on specific species or geographic areas, creating additional data biases. Seizure and other incident data is also limited by data accessibility, language barriers, law enforcement effectiveness and the extent to which authorities publicise incidents. As reported by the UN Office on Drugs and Crime (UNODC) in its 2020 and 2024 World Wildlife Crime reports, seizure data can be difficult to interpret in isolation and can lead to false conclusions because the data represents more than one indicator – the presence of a problem and the initiative of the relevant authorities in addressing it. On their own, seizures cannot be used to demonstrate the magnitude and trend of the trafficking and should always be analysed alongside other information sources to obtain a more comprehensive picture.

Above, left: A large quantity of ivory being weighed by a trader.



Ivory offered by a trader together with an export agreement highlighting the price of "Custom fees"

CASE STUDY: BACK TO BUSINESS

WEAK ENFORCEMENT AND CORRUPTION UNDERMINE PROSECUTION DETERRENCE

Mr X is a Nigerian illegal wildlife trader operating a shop selling carved ivory products at Lekki Craft Market. From this storefront, he has developed links with Asian buyers, particularly Chinese clients, supplying large quantities of pangolin scales and elephant ivory sourced from neighbouring countries such as Cameroon, Gabon and CAR.

In February 2022, Mr X was arrested for unlawful possession of nearly 900kg of pangolin scales and 145kg of elephant ivory. He was convicted in May 2023 and sentenced to two years' imprisonment.

However, EIA's intelligence indicates that within months of his sentencing, Mr X was free and had resumed offering illegal wildlife products. By November 2024, approximately 18 months after sentencing, he was documented offering up to five tonnes of pangolin scales, demonstrating the rapid rebound of his trafficking operation.

Intelligence suggests Mr X spent only a few months in custody following his arrest and reportedly paid several million naira through his lawyer during court proceedings. While his vehicle and mobile phone were seized, his bank accounts, suspected to contain funds obtained from illegal business, were neither frozen nor confiscated, highlighting gaps in asset recovery measures.

The arrest also appears to have created new corruption risks. Mr X claimed he had established contact with a Customs official involved in the operation, alleging that advance payments could provide early warning of enforcement activities.

Mr X's swift return to business is not an isolated case but rather a common pattern. In November 2025, a prolific trader who remains on the run for a 2021 offence, was documented offering more than 700kg of ivory, with a contract to supply a total of three tonnes within 60 days, including export arrangements priced at NGN35 million for "customs fees and shipping".

These cases illustrate how weak sentencing enforcement, limited financial investigations and corruption vulnerabilities continue to undermine deterrence and enable wildlife trafficking networks to persist. Addressing these weaknesses will be essential if transnational investigations and prosecutions are to deliver lasting impact.



CORRUPTION RULES, FRUSTRATES AND UNDERMINES ENFORCEMENT AND JUSTICE

Positive change is happening in Nigeria and many other countries implicated in wildlife trafficking across the trade chain between WCA and Asia. But even if investigations were thorough, transnational and gathered evidence of prosecutorial quality, and if prosecutions were timely and resulted in outcomes that deterred offending, these efforts will continue to be undermined by corruption.

It is important to note that Nigeria scored 26 out of 100 on Transparency International's 2025 Corruption Perceptions Index, indicating persistent concerns regarding public-sector corruption.[18] Endemic corruption across Nigeria's Government and society has resulted in deep mistrust among the general public in key governance and law enforcement institutions.[19] These findings support EIA's observations during the past five years, which reveal the growth of corruption as an organised and integral part of the IWT.

Beyond the wildlife trade, corruption drives the trade in narcotics, counterfeit pharmaceuticals, timber and other transnational organised crimes.[20] Corruption not only allows for criminal networks to flourish, but also diverts public resources from communities, further fuelling poverty and inequality in Nigeria and feeding into the cycle whereby people are pushed into criminality as a means of survival.

Without addressing corruption, law enforcement efforts to combat IWT risk being undermined. Legislation implemented into a system which allows for the circumvention of the law make such measures redundant.

While corruption exists across the trade route, as the key exporting hub, Nigeria holds leverage over the trade. Addressing corruption within its own system will significantly disrupt the flow of goods along the route. It will also address other transnational organised crimes which operate out of Nigeria facilitated by corruption.

Carved ivory products offered for sale at Lekki Market.

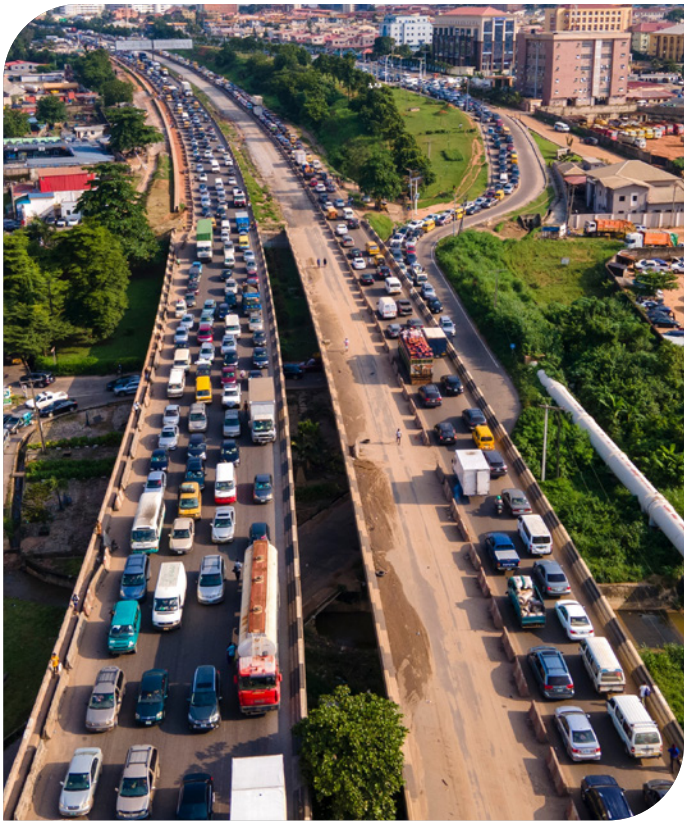
REGIONAL AND DOMESTIC TRANSPORTATION

As a key facilitator and routine cost within the illegal wildlife supply chain in WCA, corruption plays a central role in the transportation of illicit wildlife products.

While some traders collect the goods themselves, others will use transporters. Traders pay their transporters in advance, including the fees for bribes to authorities – an anticipated expense in their journey.

Corruption is evident throughout the region and EIA intelligence shows that bribery within Nigeria acts as the primary enabler of the trade.

Once goods arrive in Nigeria, they often travel by road to locations where they can be consolidated and packed before being exported by sea or air cargo. Bribes paid to authorities at checkpoints along the road allow for wildlife products to be transported across the country with reduced risk of enforcement action. Such bribes can be paid to deter authorities from conducting thorough checks on the vehicle or, if the wildlife products are discovered, larger bribes can be given to prevent the goods from being seized.

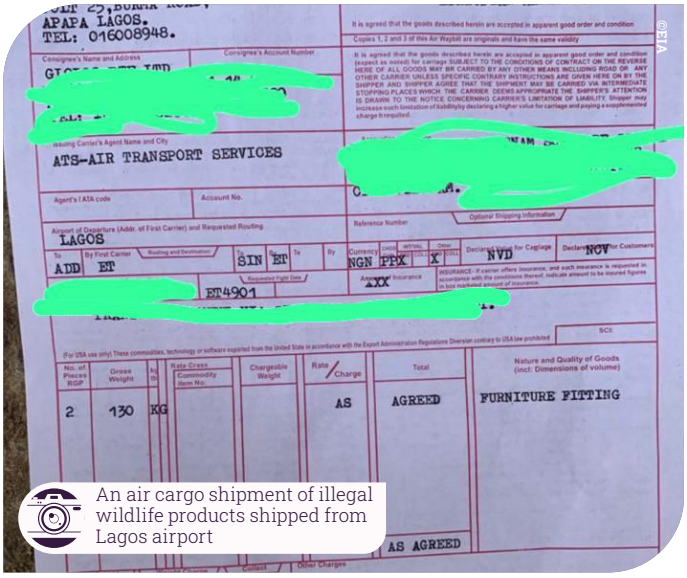


EXPORT

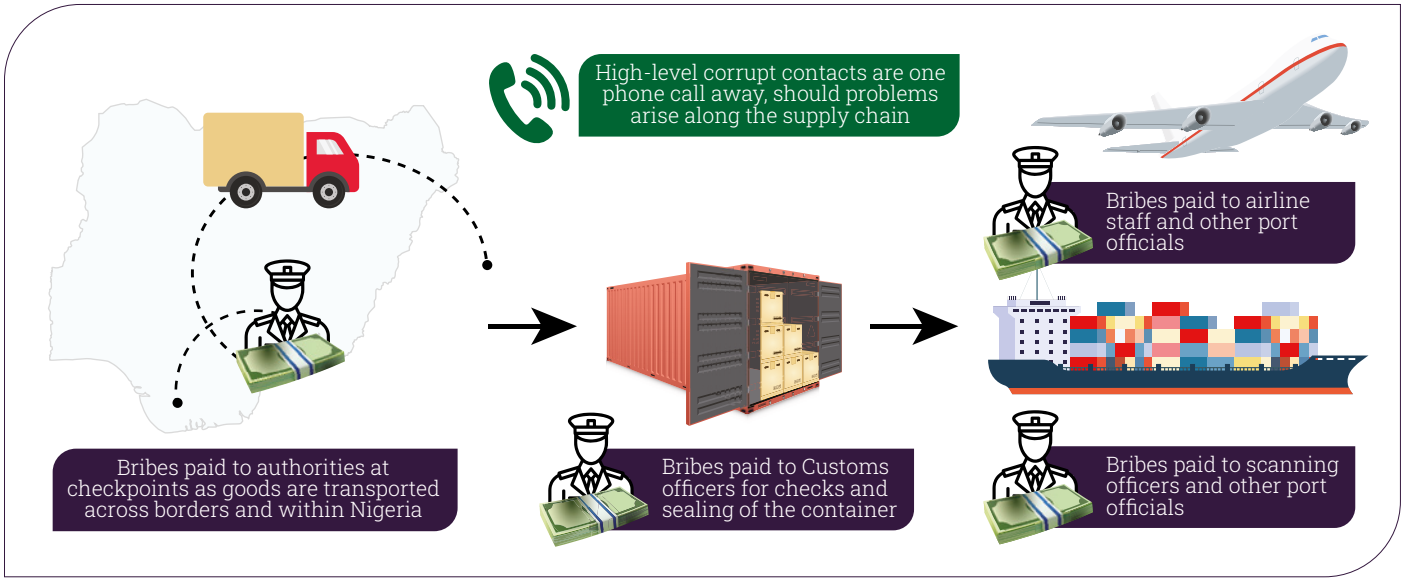
For goods being exported by sea, bribes are paid to officers who inspect and seal the container before export. Bribes can also be paid to scanning officers and other port authorities during export.

When shipping illegal wildlife goods as air cargo, traders must pay multiple authorities, including the airline staff and other entities operating at the airport. Illegal goods such as carved ivory jewellery can also be smuggled out of Nigeria while being worn by passengers; EIA investigations reveal reports of bribes paid to airport staff to allow for such products to pass through security.

***Figure 3:** Bribe payments made to authorities along the supply chain within WCA of illegal wildlife products being prepared for export via sea or air cargo*



An air cargo shipment of illegal wildlife products shipped from Lagos airport





INGRAINED IN THE SYSTEM

Traders with corrupt high-level contacts operate with an extra layer of security, knowing they can call upon them should unexpected problems occur along the supply chain. In conversation with EIA investigators, traders frequently stress the importance of paying sufficient bribes to authorities or risk encountering problems.

The ingrained nature of corruption within Nigerian law enforcement agencies undermines parallel enforcement efforts working to combat wildlife crime. Operating within this environment, Nigeria has remained the preferred export country for wildlife traders, operating both sea and air routes out of the country, reassured by the notion that they can pay their way out of trouble.

The cost of bribes has increased in recent years, with corrupt officials creating a mutually beneficial system of financial gain for both themselves and traders. Accepting bribes is not the only way corrupt officials make money from IWT. EIA has also heard of incidents where officials are awarded bonuses or promotions for conducting seizures and subsequently selling the seized goods back to traders for profit.

Some traders have long-standing relationships with their corrupt contacts, offering them gifts or monetary incentives throughout the year to maintain the connection.

Above: Paying bribes to officials for safe passage of illegal wildlife products is common-place across the supply chain.

Above, right: Pangolin scales remain one of the most heavily trafficked wildlife products globally.



TRADER: *"We bought one carton of wine, we went to Shoprite, we bought expensive wine, we carried and went. One about* ***₦320,000****. Then put* ***₦2 million****... I put in an envelope... cash. We went and gave him."*

EIA: *"[To the] Comptroller?"*

TRADER: *"Yes. He was very happy."*

EIA UNDERCOVER MEETING WITH A TRADER



NIGERIA CUSTOMS SERVICE

Although corruption is present across various law enforcement bodies, NCS remains integral to the facilitation of the trade. EIA investigations have uncovered the organised manner by which traders can leverage their strong connections within the NCS to greatly reduce risk across their supply chain.

NCS is led by the Comptroller-General of Customs (CGC); different regions across the country are split into Customs Area Commands, each managed by an Area Comptroller. Within each Area Command there are multiple specialised units overseen by a Deputy or Assistant Comptroller.

One prolific Nigerian trader alleges that his senior-level contact in NCS arranges the safe passage of his illegal wildlife goods across Nigeria to the port of export. This includes negotiating and distributing bribe payments to all relevant law enforcement agencies in the regions the goods will pass through before being shipped out.

One trader describes how they arrange bribe payments with officials of different units, including a unit which will check the value of the illicit goods and indicate how much the bribe needs to be. Once the bribe payment has been made via bank transfer, the trader's container number will be shared within customs to ensure it passes smoothly out of the port. A few months after the shipment has been cleared, the illicit profits generated from bribe payments will be distributed to high-level NCS officials.

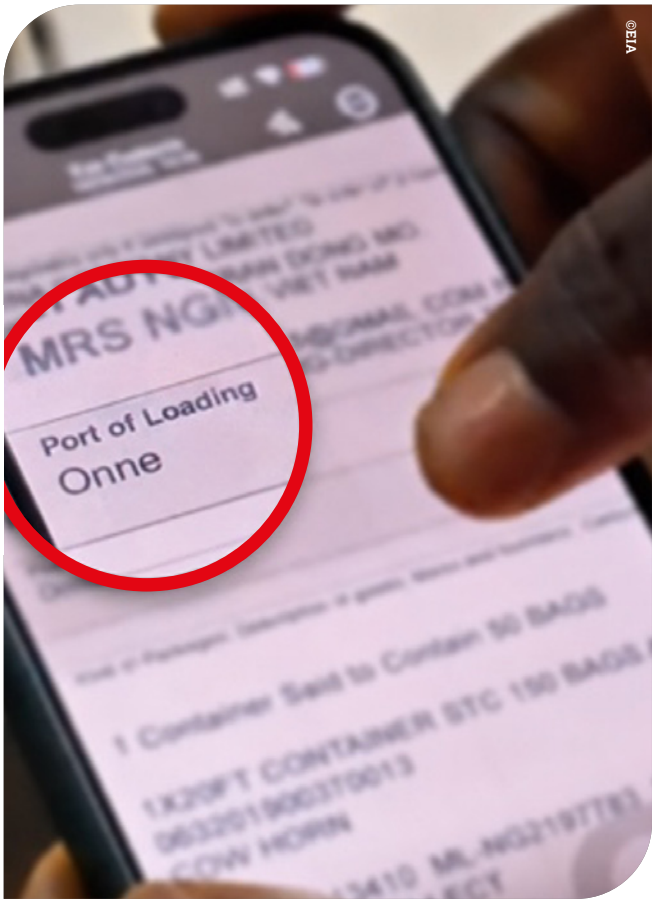
Above: Corruption within the Nigeria Customs Service is a key facilitator in the illegal trade in pangolin scales and ivory.



EIA: *"So is the [customs guy] responsible for managing Port Harcourt?"*

TRADER: *"Not really. He [Mr Y] has that … relationship because he is from customs. Let me tell you something – if [Mr Y] is not from customs, I cannot do this. If [Mr Y] is not from customs, this cannot be done. I can only do this only if he must be from customs."*

EIA UNDERCOVER MEETING WITH A TRADER EXPLAINING HOW THEY CANNOT OPERATE WITHOUT THE SUPPORT OF NCS



Right: A trader showing EIA details of an IWT shipment listing Onne Port as the port of loading.



NIGERIA'S NEW WILDLIFE CRIME LAW

Like many countries, Nigeria's legislation to protect endangered species has proved to be inadequate.

In 2021, EIA commissioned an expert analysis of Nigeria's laws, resulting in recommendations to the then Minister of the Environment. EIA's initiative led directly to Nigeria developing a new endangered species and protection law. This is a key step for Nigeria for many reasons, not least because in 2024 an analysis of Nigeria's response to wildlife and forest crime under the ICCWC Wildlife and Forest Crime Analytic Toolkit identified 33 recommendations — the first of which was to revise Nigeria's laws.

Nigeria's new law represents an extraordinary national commitment and the most significant overhaul of its wildlife protection framework in nearly four decades. It not only strengthens the criminal justice response to wildlife crime but drives policy and structural reforms across multiple agencies.

Note: *At the time of publication, the Endangered Species Conservation and Protection Bill 2024 had been passed by the National Assembly and was awaiting presidential assent.*



The law provides several key measures to combat serious and organised wildlife crime, including:

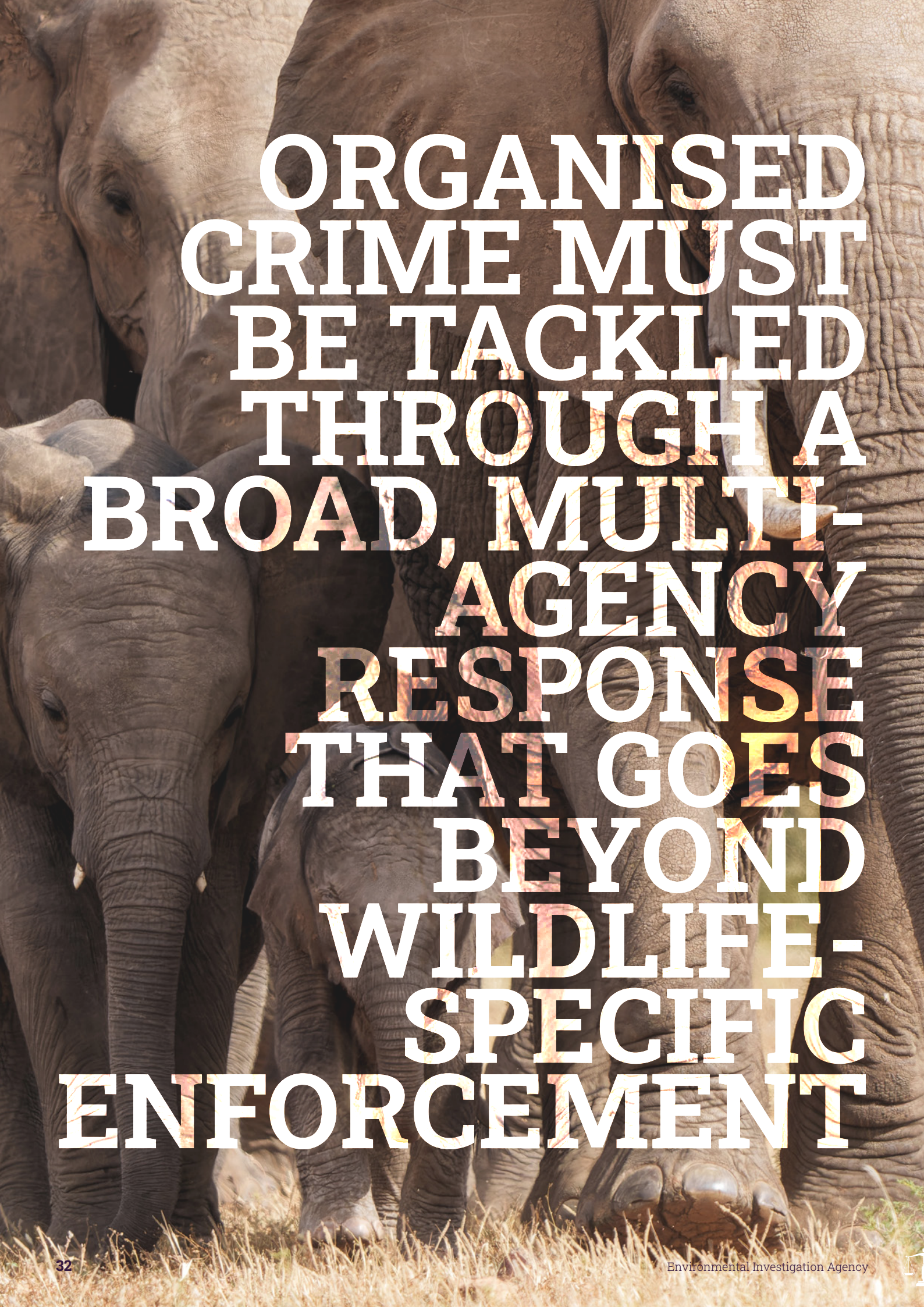
- enhanced law enforcement capabilities;
- expanded investigative powers to include financial enquiries and intelligence-led operations;
- greater court powers to expedite wildlife cases and recover assets;
- the creation of corporate liability;
- stricter penalties for traffickers and poachers;
- and stronger alignment with international treaties and conventions to support cross-border cooperation and the extradition of offenders.

These provisions directly address the vulnerabilities exposed by EIA's investigations. The powers to probe financial transactions are particularly significant — as this report documents, following the money is one of the most underutilised and potentially impactful tools available to disrupt trafficking networks. Corporate liability closes a longstanding loophole exploited by traders operating through legitimate import/export businesses; the ability to extradite offenders is critical given the transnational nature of the networks involved.

While this legislation is a critical step in supporting intelligence-led and proactive responses to organised wildlife crime and in ensuring a more robust criminal justice response that deters such offences, unless Nigerian investigators, prosecutors and the judiciary fully implement and enforce this law, it will remain little more than an advisory document.

Failure to do so would be an extraordinarily missed opportunity, not just for Nigeria but also for the wider region. Neighbouring countries are watching. If Nigeria can demonstrate that strong legislation translates into meaningful prosecutions and dismantled networks, it has the potential to set a new regional standard. If it cannot, traffickers will draw their own conclusions.

The Federal High Court of Nigeria in Abuja.



ORGANISED CRIME MUST BE TACKLED THROUGH A BROAD, MULTI-AGENCY RESPONSE THAT GOES BEYOND WILDLIFE-SPECIFIC ENFORCEMENT



CONCLUSION

More than six years of EIA research and investigations paint a consistent and deeply concerning picture.

The ongoing illegal wildlife trade flowing through Nigeria and the wider WCA region is not a fragmented collection of opportunistic crimes — it is an organised, adaptive and financially sophisticated criminal enterprise sustained by corruption, enabled by weak enforcement and increasingly intertwined with drug trafficking and money laundering.

The evidence in this report demonstrates that current approaches are falling short. Contraband is intercepted, but networks are not being dismantled. Arrests are recorded, but convictions are rare and deterring sentences rarer still. Each time enforcement tightens in one location or disrupts one method, traders adapt by shifting cities, changing concealment methods, moving money through new channels.

The resilience of these networks is not accidental – it is the product of deep-rooted corruption and a persistent failure to pursue the high-level actors who coordinate and profit most.

There are, however, genuine reasons for cautious optimism. Nigeria's new law represents a serious legislative commitment which, if enforced, could fundamentally alter the criminal justice response to wildlife crime. The shift toward digital financial transactions among traders creates new opportunities for financial intelligence-led investigations. The growing recognition that wildlife crime converges with broader organised criminality opens the door to more coordinated, multi-agency responses.

But legislation and opportunity mean little without political will and sustained international support. The species affected by organised trafficking cannot withstand indefinite exploitation. The window to act is narrowing.

The message from almost a decade of frontline intelligence is clear – reactive, commodity-focused enforcement is not enough. Dismantling these networks requires multi-faceted, collaborative investigations, targeting the powerful and treating wildlife crime with the seriousness it deserves.

Above: Pangolins are heavily traded for their scales and meat, pushing them to extinction.



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2. All data analysis in this report refers to recorded incidents that have occurred between January 2021 to February 2026.

3. Countries include Angola, Benin, Burkina Faso, Cameroon, the Central African Republic, Chad, the Democratic Republic of the Congo, the Congo, Côte d'Ivoire, Gabon, the Gambia, Ghana, Guinea, Liberia, Nigeria, Senegal and Togo

4. EIA classifies large-scale seizures as anything above 500kg seized.

5. Incidents 'linked to Nigeria' refer to incidents that occur globally that are connected to Nigeria. For example, this may include a seizure that took place in Vietnam, but the shipment was origin Nigeria.

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