



environmental
investigation
agency

Forests

Double Impact

The nexus where wildlife
and forest crime overlap

January 2021





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ABOUT EIA

We investigate and campaign 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 like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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Above: African forest elephant (*Loxodonta cyclotis*) populations, particularly in parts of West and Central Africa, are being poached for their highly prized 'yellow ivory'.

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Executive summary

EIA conducted a review of the information gathered between 2017 and 2020 by its Wildlife and Forests teams in Africa and Asia in order to examine the relationship between wildlife and forest crime. Detailed analysis of this information revealed a relationship (or 'nexus') between the two crime types in three key areas:

Geographic nexus

In Africa and Asia, there is a significant convergence between illegal wildlife and illegal timber 'hotspots', transportation routes, processing hubs and key ports. EIA's analysis further points to a geographic convergence at the local level, with specific towns and cities acting as hubs for both crime types in hotspot countries. Transnational organised crime groups use the same networks of corruption from source to destination to facilitate the movement of both illegal wildlife and forest crime products.

Timber companies and timber as a concealment method

In Africa and Asia, there is a significant convergence between the way illegal wildlife and illegal timber is traded and shipped. Traders within Africa and Asia trade in both illegal wildlife and illegal timber products. Timber is used by traffickers

for sending illegal wildlife shipments both within Africa and from Africa to Asia. Traffickers may send shipments of illegal wildlife products within shipments of legal timber, but they also send products within shipments of illegal timber. Asian wildlife trafficking networks have set up timber companies to act as fronts for their wildlife trafficking activities in Africa.

Link between deforestation and the illegal wildlife trade

In Africa and Asia, there is a significant correlation between deforestation and increased levels of poaching which, in turn, often leads to higher levels of illegal wildlife trafficking activity. Road building by timber companies in hotspot illegal timber and wildlife trade countries has made wildlife populations in those countries more accessible to poachers and is fuelling the illegal wildlife trade in these countries.

Time to act

During 2021, the Convention on Biological Diversity, the UN Convention on Climate Change, a special session at the UN General Assembly on Corruption and a session at the UN Convention Against Transnational Organised Crime all offer the opportunity to make progress on wildlife and forest crime through international action. A number of nexus hotspot countries have also introduced new legislation in response to the coronavirus pandemic and the link to zoonotic diseases – those arising from animals – driving potential progress at the national level.



Above: 2021 offers the international community many opportunities to act against illegal wildlife and timber trafficking.

Key policy recommendations

EIA believes the UK Government, international organisations and the governments of nexus hotspot countries should:

1. Recognise that a nexus between wildlife and forest crimes exists and to support countries affected in order to address it as it manifests;
2. Apply the Wildlife and Forest Crime Analytic Toolkit produced by the International Consortium on Combating Wildlife Crime (ICCCWC) to comprehensively assess weaknesses and put in place action plans which are made public and which are robustly monitored and reported against;
3. Ensure that where countries can report on or be assessed against progress on combating environmental crimes and associated enablers such as corruption and money-laundering, they do so (such as the Review Mechanisms for UN Convention Against Corruption, the UN Convention Against Transnational Organised Crime and the Financial Action Task Force Mutual Evaluation process);
4. Take action to address corruption in ports, in concert with private sector actors operating in and through ports.

Introduction

Following on from the London Conference on the Illegal Wildlife Trade in 2018, EIA was asked by FGMC to consider if there were opportunities that we had missed in addressing forests that may have relevance to efforts to tackle the illegal wildlife trade

Why does the nexus between WFC matter?

The international community recognises the significant detrimental impacts of wildlife and forest crime (WFC)¹ and has made commitments to increase the pressure on criminals engaging in these activities. As EIA noted in our 2017 report *Time for Action*² it is the implementation of these various resolutions and commitments that has been slow.

The devastating impact of COVID-19 has again shown governments that unsustainable exploitation of the world's flora and fauna can lead to significant costs, economically and to the security of citizens. Action to address WFC would help to tackle the degradation of the world's biodiversity, adding significantly to our overall wealth and wellbeing³. This is particularly important in the context of the 15th meeting of the Conference of the Parties to the Convention on Biodiversity (CBD CoP15) and the upcoming UN Climate Change Conference (UNFCCC CoP26). WFC issues are also pertinent to the UN Convention against Transnational Organised Crime (UNTOC), alongside the 14th UN Congress on Crime Prevention and Criminal Justice, as well as the CITES Standing Committee meetings expected to take place in the coming months and the CITES CoP19 thereafter.

Methodology

This report has been informed by internal intelligence and analysis of external data sources. Information is collected by EIA from a variety of different sources, some of which are sensitive and sourced from people actively engaged in wildlife and/or timber trafficking. EIA uses the UK's approved intelligence grading system, as set out by the College of Policing. The reliability of the source is evaluated, along with the validity and accuracy of the information. Grading intelligence in this way determines the level of confidence that can be achieved from the intelligence when developing

inferences. Crime hotspots, methodology trends and emerging criminality can all be identified through comprehensive analysis of intelligence. This analysis identifies criminal networks involved in environmental crime.

The report focuses on key species: elephants, pangolins and rhinos as they represent the majority of all seizures by volume⁴ and form the bulk of EIA's efforts. We also reviewed data on tigers, as despite lower volumes seized in trade due to smaller populations, smuggling methods used and ineffective enforcement in some source, transit and destination countries tigers are prevalent in trade detected by EIA investigators and have very significant conservation value.

This report is not a comprehensive assessment of all available evidence on the relationship between wildlife and forest crime. Due to the COVID-19 pandemic, we were unable to undertake detailed fieldwork to follow up on the desk-based research that has led to the findings presented. The analysis is therefore, while being extensive and detailed, limited.

The frequency of references in EIA intelligence reports is referred to in this report as a way of illustrating trends. By using external data sources and seizure data, we have triangulated these trends to make conclusions. To select a manageable pool of data, we have analysed EIA reporting from 2017 to the present. The range of countries reviewed is also limited to those in which EIA UK is carrying out work or has done so since 2017. This means that other countries which are significant sources or destinations for illegal timber or illegal wildlife products are not included.

Finally, when estimating illicit timber flows, we have used COMTRADE data. Such data is used widely by international governmental bodies and other NGOs when analysing trade in timber products. However, some governments are unable to ensure the quality of the data and its sharing in a timely manner⁵.



The role of this report

In concluding that a nexus between wildlife and forest crime does exist and drawing some conclusions as to its extent and character, this report can play an important role. Tackling WFC requires the effective design of policy and then its effective implementation by relevant agencies, working collaboratively, with the right skill sets and complementary objectives. It is difficult to

Above: Pangolin scales are trafficked from Africa to Asia in large quantities. This trade mirrors closely the trades in other illegally sourced wildlife and timber.

design an effective policy response at the national level to deal with WFC without more detailed knowledge of the kinds of criminal networks that undertake WFC, the places they are working and the methods they employ to run their operations. This report seeks to help fill this gap.

The geographical nexus

In Africa and Asia, there is a significant convergence between illegal wildlife and illegal timber hotspots, transportation routes, processing hubs and key ports. EIA's analysis further points to a geographic convergence at the local level, with specific towns and cities acting as hubs for both crime types in hotspot countries.

The role of Vietnam and China in Africa-Asia illegal wildlife and timber trades

Data analysed for this report suggests that Vietnam is the most frequent destination for shipments of ivory, pangolin scales and rhino horn from Africa. While Vietnam is a significant consumer country for rhino horn, much of the volume of rhino horn and the majority of ivory and pangolin scales smuggled to Vietnam are ultimately destined for China, the primary consumer country for these products.

China or Vietnam are the destination countries in all 13 Africa- or Asia-focused illegal timber trade reports published by EIA since 2017. China is estimated to account for half of all global illegal timber imports⁷ and is the largest importer of African timber in the world⁸. It is the top importer of wood from five out of six of Africa's largest wood exporters. These include Cameroon, Gabon and Nigeria, which have high levels of illegal timber exports (see below section on Africa).

Vietnam is one of the largest timber processors in the world. In 2018, it was the world's fifth largest exporter of timber products, the second largest in Asia (after China) and largest in South-East Asia⁹. Vietnam imports a great deal of timber to feed its growing processing industry. While domestic plantations provide timber for the low value-added sector, it imports a great deal of tropical timber for production by the more lucrative sectors of the furniture industry¹⁰. This makes Vietnam of the two main destinations (alongside China) for rosewood (*Dalbergia* spp), the most trafficked wildlife or timber commodity in the world based on market value¹¹. In addition, Vietnam is one of the top two largest importers of wood from high risk (in terms of illegality and scale) countries in Africa, including Democratic Republic of Congo, Republic of Congo, Cameroon and Nigeria^{12,13}.

China and Vietnam are home to major processing centres for illegally sourced or traded wildlife and timber.

In Vietnam, villages such as Nhi Khe and Dong Ky are major processing centres for ivory, rhino horn and rosewood, while ports such as Hai Phong are major import gateways for commodities of both crime types. Border crossings such as Nam Phao-Cau Treo between Laos PDR and Vietnam and Mong Cai-Dongxing between Vietnam and China are used for both illegal wildlife and illegal timber smuggling.

Hotspots in Africa

Ivory

Ivory poaching occurs across the elephant's range. It is particularly severe throughout West and Central Africa (Gabon, Democratic Republic of Congo, Republic of Congo and Central African Republic) and is increasing in other parts of Africa, notably in Mozambique, which is estimated to have lost 53 per cent of its elephant population in five years¹⁴.

There are several major ivory trafficking hotspots which act as consolidation hubs and export hubs for shipments to Asia. Principal among these is **Nigeria**; it has been referenced 72 times as an export/transit point for ivory in EIA intelligence reports since 2018.

Democratic Republic of Congo, Cameroon and Gabon are also frequently identified as ivory transit points for criminal organisations operating in Africa. **Angola, Uganda and Mozambique** also remain significant. According to analysis of seizure data, Gabon has seen the most (76) ivory seizures since 2018, followed by Kenya (53), Zimbabwe (45), Namibia (33) and Uganda (29), showing that these countries also remain in use by traffickers.

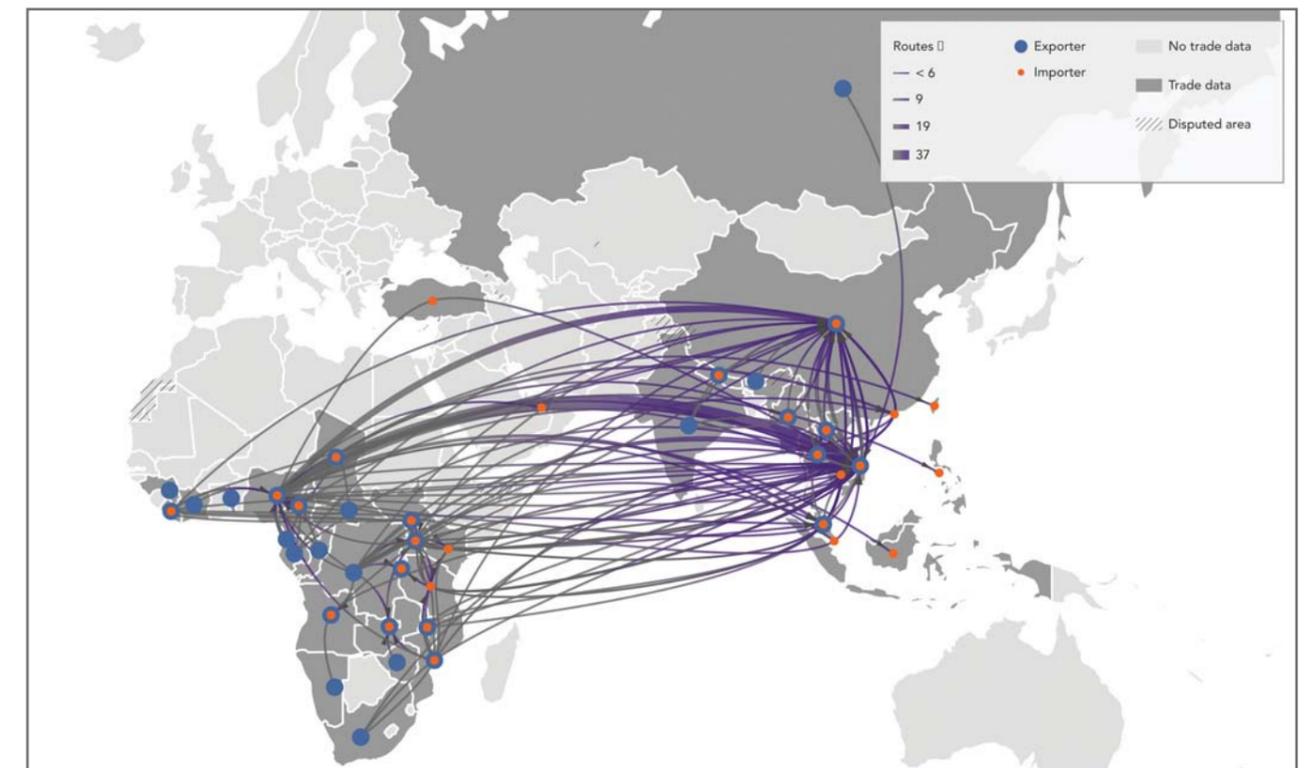
Pangolins

Pangolins are poached from the wild across their range, which spans West, Central and East Africa, as well as in South Asia, South-East Asia and East Asia. Within Africa, there are a number of major pangolin trafficking hotspots. **Nigeria** is principal among these as a pangolin scale transit point identified by EIA. **Uganda, Democratic Republic of Congo**¹⁵ and **Cameroon** also remain significant.

Rhino

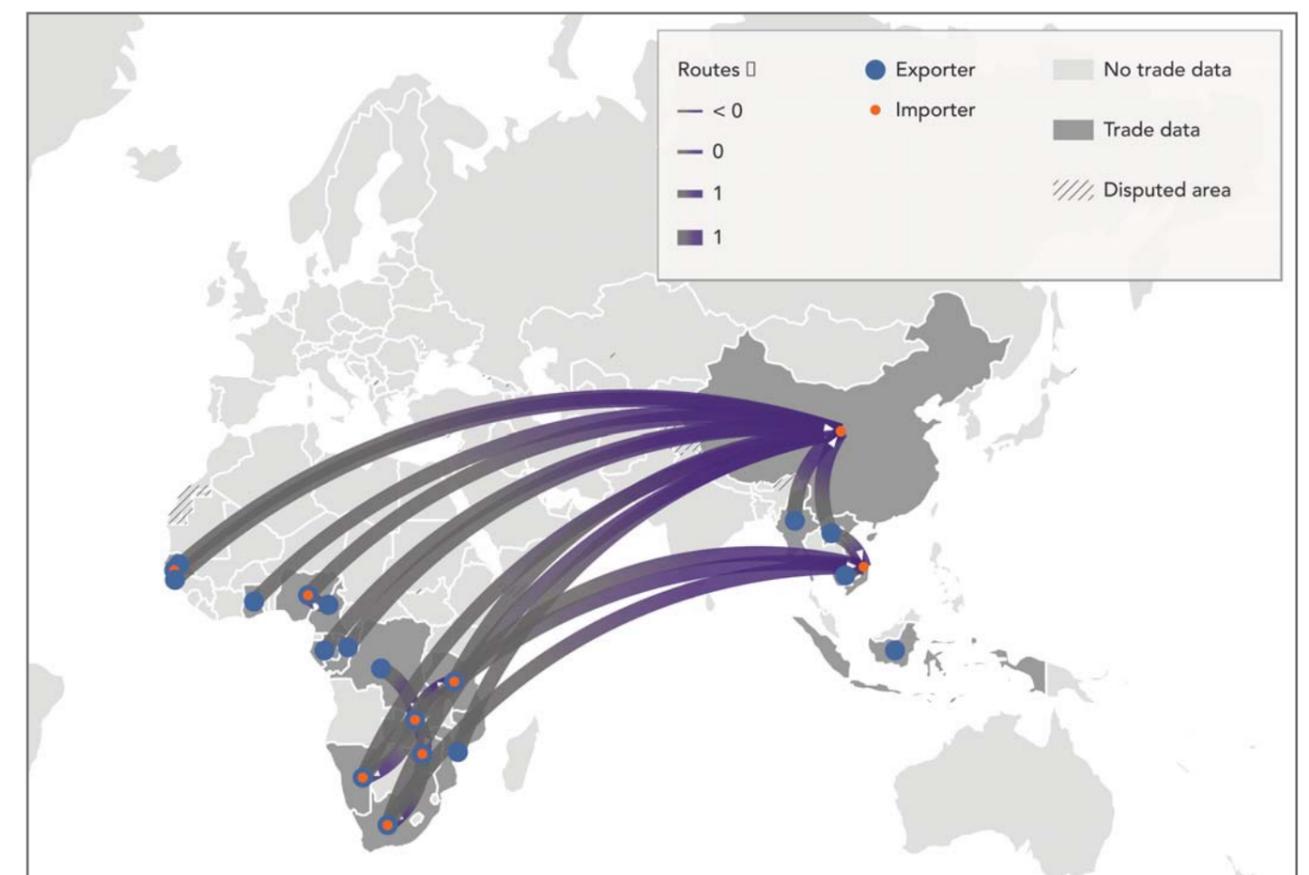
The illegal rhino horn trade relies on rhino poaching in sub-Saharan Africa, particularly in **South Africa, Namibia and Kenya**. Historically, rhino horn was moved out of Africa in large quantities from eastern seaports such as Mombasa and Dar Es Salaam. Today, due to stricter enforcement and lower volumes, the commodity is more likely to be moved

Figure 1: Frequency of ivory, pangolin, rhino and tiger routes as referenced in EIA intelligence reports 2018-20⁶



Note: the direction of trade on the above map is indicated by a shift in colour from grey to purple. If a specific route has been mentioned more than once, this will result in a thicker line. Blue dots indicate that a country was an exporter for a specific route, while orange dots indicate that the country was an importer. Countries may be both importer and exporter destinations, indicated by an orange dot inside a blue circle.

Figure 2: Illegal timber routes in Africa and Asia as referenced in EIA intelligence reports 2018-20⁶



out of Africa by air, especially from airports in **Nigeria** and **Democratic Republic of Congo**. **Angola**, **Mozambique**, and South Africa are also identified as trafficking routes.

Illegal timber

Official trade data shows the most significant source and destination countries involved in the (legal/official) timber trade. The table below, based on UN Comtrade data, illustrates the top five largest (in terms of value) exporters of wood (HS 44) in Africa in 2018.

The tables below demonstrate the five largest importers of wood for each of these countries in 2018. **China** is the largest importer for five out of six of the above countries and **Vietnam** is the second largest importer for three out of six.

EIA analysed its Africa- and Asia-focused illegal timber trade reports since 2017 and compared the findings with a 2014 Chatham House assessment on illegal timber exports¹⁵. According to the EIA reports, there is some overlap between those countries exporting timber legally and those doing so illegally. Illegal timber hotspots include **Nigeria**, **Gabon**, **Democratic Republic of Congo**, **Cameroon**, **Mozambique**, **Republic of Congo**, **Zambia**, **Senegal**, **Ghana** and **Guinea Bissau**.



Above: Dong Ky, Vietnam is a major processing centre for ivory, rhino horn and rosewood. The area attracts Chinese buyers looking to source these products.

CASE STUDY: Nhi Khe and Dong Ky

In Vietnam, two closely linked villages within 20km of Hanoi have played a key role in the illegal wildlife trade and illegal timber trade in the past decade.

Nhi Khe, located 17km to the south of Hanoi, has been a renowned centre for traditional Vietnamese wood carving for centuries. In the past 10 years, as Chinese wildlife and timber traders have increasingly looked to Vietnam to source goods, the skilled carvers already present in the village have turned their trade to a new craft – ivory, rhino horn and rosewood carving.

Nhi Khe's emergence as a hub for ivory, rhino horn and rosewood products (especially smaller craft items) is closely linked to the development of another small village – Dong Ky, which is located 20km to the north-west of Hanoi.

Between 2000-15, Dong Ky and the surrounding area was the centre for the rosewood trade in Vietnam. Chinese buyers travelled to the area's markets to source raw materials and products (especially furniture). Many of these same buyers would then be taken to Nhi Khe by their translators to shop for ivory, rhino and craft rosewood products.

With more and more Chinese buyers visiting Nhi Khe, the town soon developed into a wildlife trade hotspot, with traders coming not only from the village but also from other areas in Vietnam, such as Nghe An Province, a long-time wildlife trade hotspot.

Following NGO reporting and resultant law enforcement, since 2017 the illegal wildlife trade in Nhi Khe has largely gone underground.

CASE STUDY: Consumer market, Guangdong Province

Guangdong Province in southern China has been one of the main destinations in the world for illegal wildlife commodities and illegal timber during the past 20 years.

The provincial capital, Guangzhou City, has long been an important trading hub for all types of commodities and is also the centre of Cantonese culture and cuisine. The city is also home to famous markets for unprocessed traditional Chinese medicine ingredients, such as Qingping market, as well as to traditional Chinese medicine companies such as Kangmei Pharmaceutical Co Ltd.

Guangdong Province has featured heavily in EIA's Wildlife team investigations in recent years. In 2017, EIA's report *The Shuidong Connection* demonstrated how the province, and especially the town of Shuidong in Dianbai County, Maoming City, was the centre of the global ivory smuggling trade. According to EIA intelligence reports since 2018, Guangdong Province is also a major centre

for the pangolin scale and rhino horn trade in China. The province's main airport, Guangzhou Baiyun International Airport, also saw more ivory seizures than any other airport between November 2019 and June 2020.

Analysis of EIA intelligence reports and seizure databases further indicates that Guangzhou Port is one of the most common destination ports for pangolin scale shipments from Africa.

Guangdong Province has also featured prominently in EIA Forests team investigations in the past decade. In 2017, EIA's report *The Rosewood Racket* demonstrated how Guangzhou Port was one of the two most common destination ports for illegally traded kosso logs from Nigeria and highlighted the districts of Xinhui and Zhongshan as two of the three main processing centres for rosewood in China. Guangdong Province has also featured as a major destination for illegally traded Burmese teak in EIA investigations in Myanmar.

Figure 3: UN Comtrade data on timber exports from Africa (2018)

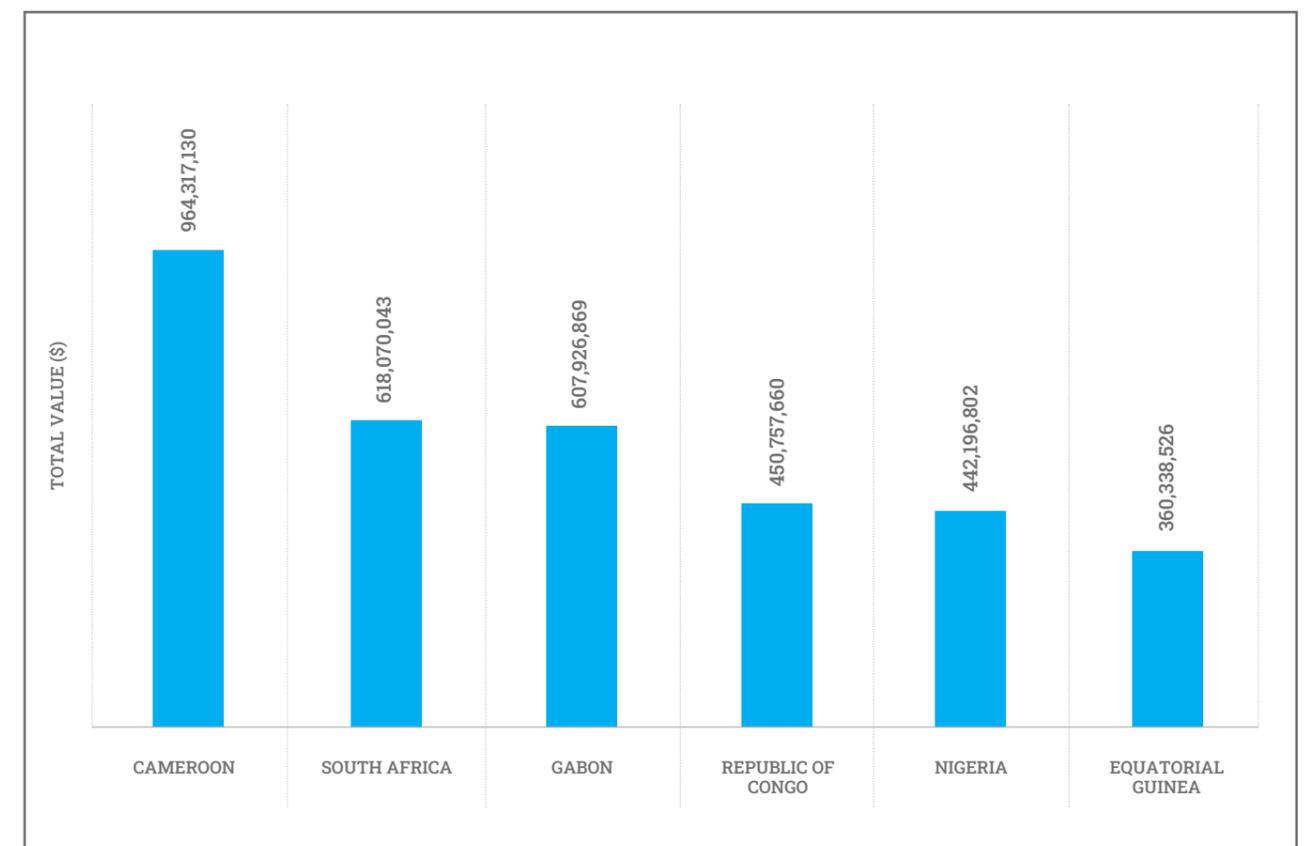


Figure 4: Major importers for African timber, by \$USD value (2018)

Cameroon

Importer	Total value of wood imports (\$)
China	325,940,172
Vietnam	188,229,192
Belgium	122,769,330
Italy	63,903,829
France	28,755,626

South Africa

Importer	Total value of wood imports (\$)
Japan	226,248,249
Botswana	57,990,272
Namibia	48,824,205
China	42,361,691
UK	35,353,384

Gabon

Importer	Total value of wood imports (\$)
China	312,402,167
France	68,216,243
Belgium	60,529,798
India	42,884,797
Italy	27,716,570

Chatham House in 2014 estimated, based on illegal exports to other countries in the study only, the percentage of illegal timber to legal timber as a total volume of their exports of timber for some of these. The figures were:

- **Republic of Congo** (66%)
- **Democratic Republic of Congo** (60%)
- **Ghana** (28%)
- **Cameroon** (27%)

If looking at exports to China alone, then Chatham House estimated that the percentage of illegal exports was even higher:

- **Republic of Congo** (84%),
- **Democratic Republic of Congo** (79%)
- **Ghana** (40%)
- **Cameroon** (38%)

Republic of Congo

Importer	Total value of wood imports (\$)
China	215,561,801
Vietnam	93,832,969
Belgium	27,110,576
France	22,466,847
USA	13,719,318

Nigeria

Importer	Total value of wood imports (\$)
China	290,451,892
Vietnam	40,138,792
Poland	14,681,969
India	14,560,798
Lebanon	11,233,433

Equatorial Guinea

Importer	Total value of wood imports (\$)
China	345,793,504
Spain	6,627,193
Republic of Korea	4,004,096
France	2,055,993
Lebanon	626,823

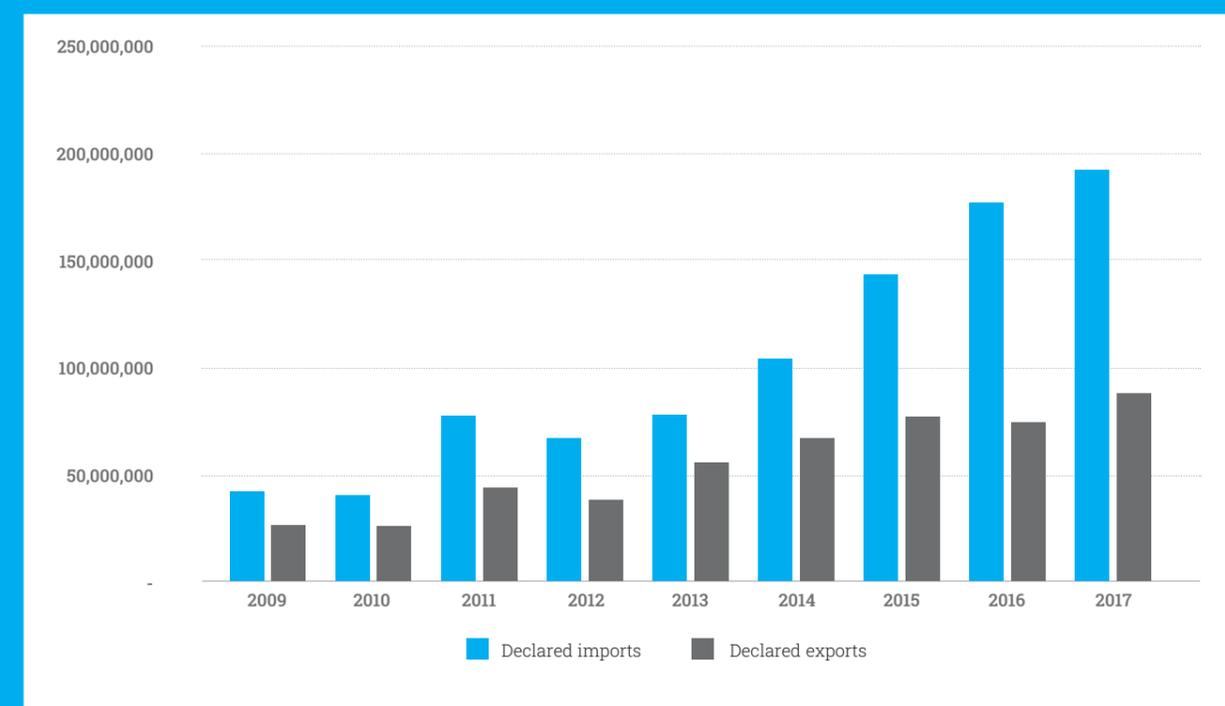
Chatham House will update its research in 2020, but this is not complete and therefore we have not been able to draw on the most up to date figures.

Nigeria, followed by **Democratic Republic of Congo**, are the two most referenced countries in Africa as illegal timber transit points in all EIA intelligence reports since 2018.

The overlap between legal and illegal exports can be further corroborated by analysis of UN Comtrade data. EIA analysis of this data shows discrepancies between reported timber exports from various countries heading to China and Vietnam and declared imports in China and Vietnam from these countries. Where significant, these discrepancies can be viewed as an indicator of illegal activity, especially when corroborated by other evidence¹⁶.

CASE STUDY: Illegal timber exports from Cameroon to Vietnam

Figure 5: Overview of the declared timber trade from Cameroon to Vietnam, by \$USD value (2009-17)



Cameroon was the most significant exporter of timber from Africa in 2018. During the period 2009-17, Vietnamese-declared imports of timber products (HS code 44) from Cameroon was valued at \$923m, while declared exports from Cameroon for the same products was declared at \$501m; a difference of 84 per cent.

EIA reporting¹⁷ shows evidence of significant and systematic trade in illegal timber from Cameroon

to Vietnam. During the period January 2016 to July 2020, EIA estimated that 132,000m³ of logs have been exported from Cameroon to Vietnam in breach of a partial log export ban. This accounted for an estimated 11 per cent of the total volume of logs exported to Vietnam (13 per cent of the total value) during this period. The significant risk of illegal timber in Cameroon's timber exports is also noted elsewhere¹⁸.

In Africa, there is significant convergence in the ports used to export illegal wildlife and illegal timber. These tend to be the major ports in the nexus country hotspots. In particular, we would highlight Apapa Port Complex in Nigeria, Pointe Noire in Republic of Congo and Matadi in Democratic Republic of Congo.

Other areas of intra-country geographic convergence include towns such as Sagamu in Nigeria, which acts as a transit point for illegal timber and a consolidation hub for pangolin scales, and national parks such as Messok Dja in Republic of Congo, which are afflicted both by poaching (in this case of forest elephants and pangolins) and illegal logging.

Hotspots in Asia

China and Vietnam

China and Vietnam are significant in the source, import, processing, sale and consumption of illegal wildlife and timber products from Asia, while Vietnam is also an important transit country.

China and Vietnam are the countries in Asia most frequently identified as transit/destination points for ivory (Vietnam: referenced in reports 51 times; China: referenced in reports 21 times), pangolins (Vietnam: 47; China: 33) and rhino (Vietnam: 25; China: 13) since 2018.

Vietnam is a source of captive-bred tigers in illegal international trade, as well as transit country for tiger products moved from elsewhere in South-East

Figure 6: Frequency of Asia-only ivory, pangolin, rhino and tiger routes as referenced in EIA intelligence reports 2018-20⁶

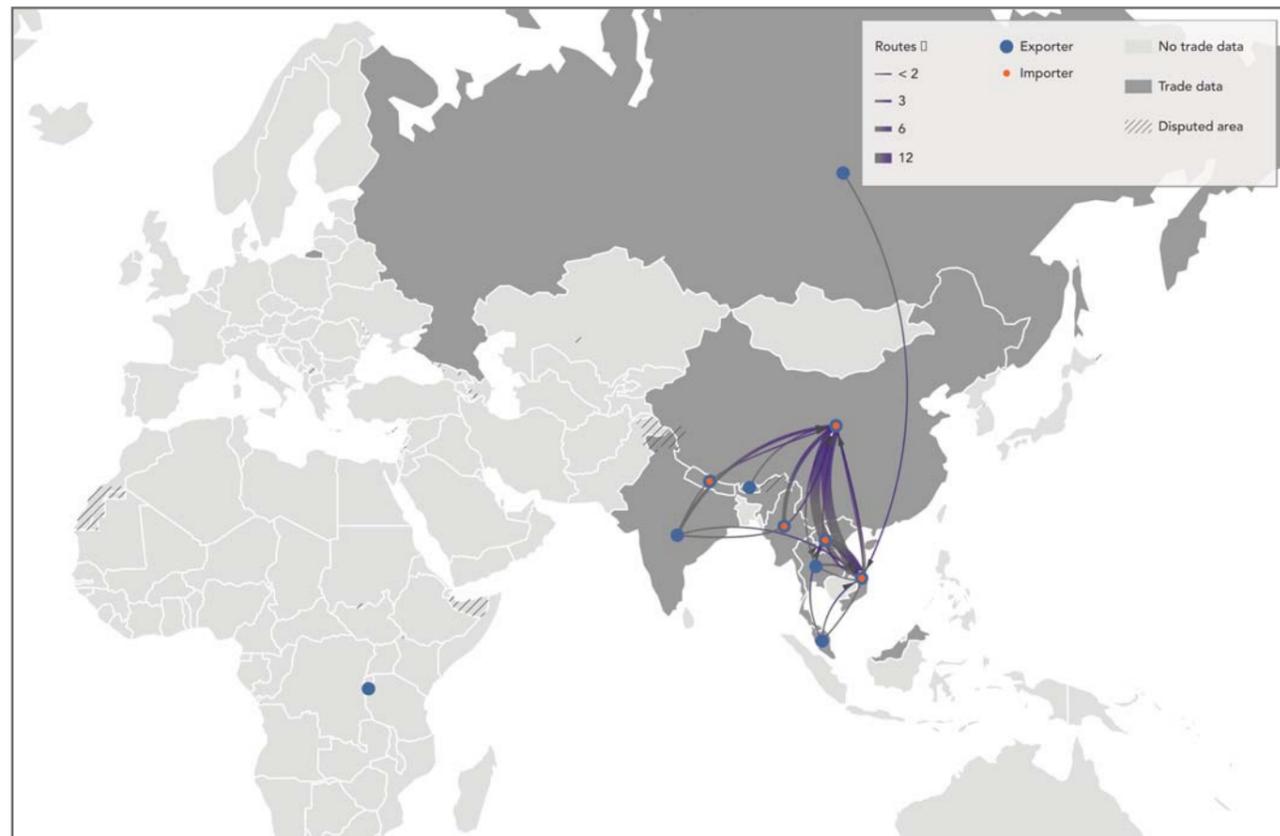
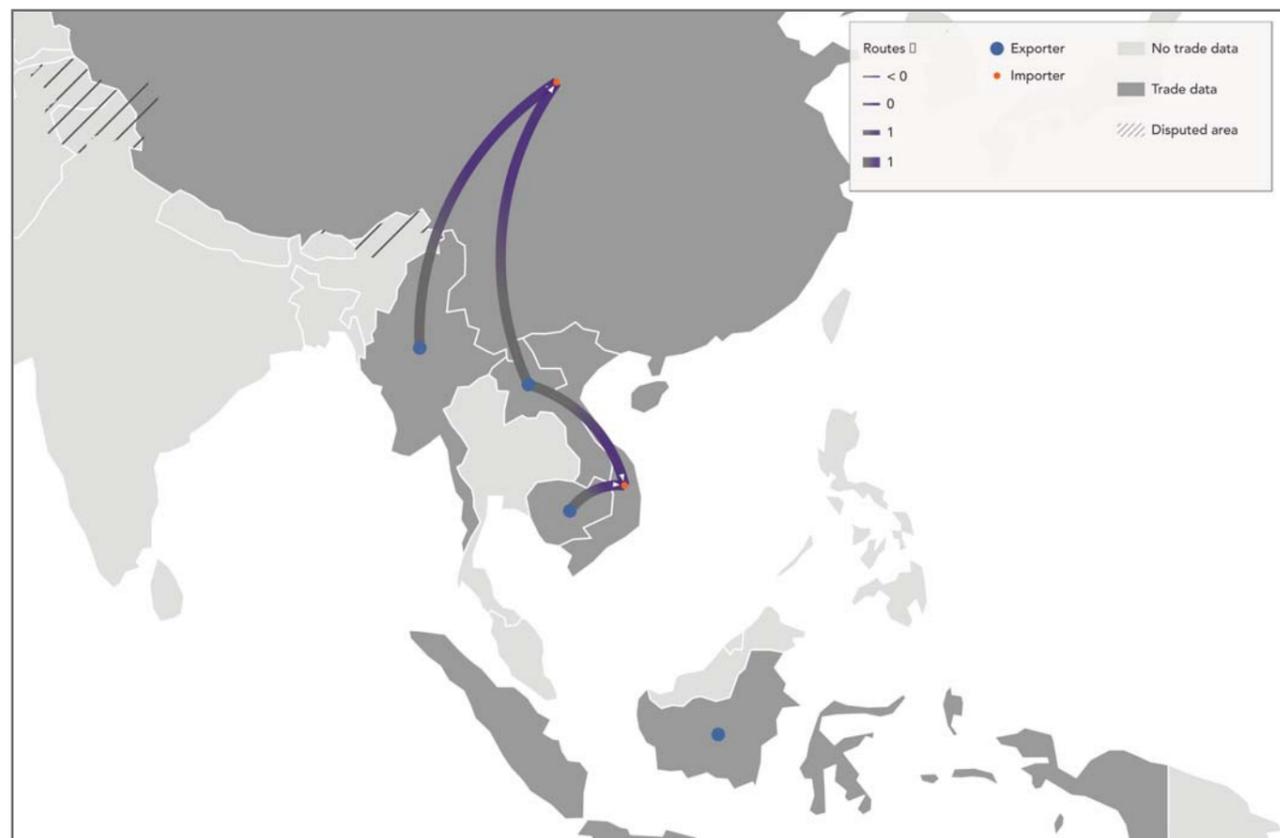


Figure 7: Illegal timber routes in Asia-focused EIA public reports (2017-20)⁶



Asia to China, and a major consumer of tiger products. Beyond this, the picture of active trade routes for wild tiger poaching and trafficking is complex. Seizure data points to certain routes being dominant, but this is skewed by a high proportion of publicised seizure incidents coming from certain countries (notably India, Nepal, China, Russia) versus few reports from other countries (Myanmar, Laos, Thailand, Cambodia). This is despite massive declines and local extirpations of wild tigers in south east Asia, the growth of tiger farms and these countries being implicated as significant in illegal tiger trade in EIA’s intelligence database. Discrepancies can be caused by differing levels of law enforcement effort and public reporting.

Vietnam and China are also driving an illegal trade in timber within Asia. EIA has shown that China imports illegal timber from Myanmar¹⁹ and Laos²⁰. China is also one of the main destinations for illegal timber from India, Malaysia and Indonesia. Vietnam is the primary destination for illegal timber from Cambodia²¹ and Laos.

Above: Illegal logging in Phnom Prich Wildlife Sanctuary, Cambodia. The country is also a significant source of, transit route for and consumer of illegal wildlife.

South-East Asia

A nexus between wildlife and forest crime is prevalent in much of South-East Asia, beyond Vietnam. Laos, Myanmar, Cambodia, Malaysia, Indonesia and Singapore are all frequently referenced as transit points for illegal wildlife in EIA intelligence reports. Laos and Myanmar are also home to major illegal wildlife markets, along with Thailand and Cambodia.²²

Indonesia is an ivory source and consumer country, a source and transit country for pangolin scales^{23,24} and a source, consumer and exporter of tiger and exports huge volumes of timber to China²⁵. Chatham House estimated that in 2014, 70 per cent of the timber and timber products Indonesia exported to China were illegal²⁶.

Although there are no up-to-date figures, trade data suggests this situation is likely to have improved

subsequently, notably owing to the successful agreement of a Forest Law Enforcement, Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA) between Indonesia and the European Union.

Laos and Myanmar have also been subject to extensive illegal logging²⁷. However, in recent years there has been a notable reduction in the legal trade of timber from Laos to Vietnam²⁸. This is likely to have resulted mostly from the imposition of Lao Prime Ministerial Order 15, enacted in May 2016²⁹, but the long-term impact of this legislation is unclear at the present time.

Cambodia has an increasingly important role in the illegal ivory trade³⁰. Cambodian logging gangs, controlled by the Cambodian military, frequently enter Thailand for both protected and seized Siam rosewood (*Dalbergia cochinchinensis*).

Transshipment

Transshipment or transit destinations between Africa and Vietnam or China are very common in the illegal wildlife trade and are also used in the illegal timber trade, albeit to a lesser extent. Given its bulk and the fact that it is relatively easy to mix legal and illegally sourced timber, timber often takes a more direct route to its final markets; illegal wildlife products, by contrast, sometimes move through five or more countries before arriving at their final destination.

Malaysia, Singapore and Hong Kong are the most significant trans-shipment points for illegal wildlife and timber on the Africa-Asia trade route. Ports such as Port Johor in Malaysia and Port of Singapore act as key transit or transshipment points for illegal wildlife commodities and illegal timber destined for China and Vietnam.

What factors make these locations viable trafficking hubs?

Trade chains have developed for the movement of illegally sourced or traded timber and wildlife because of market dynamics. Wildlife and timber are harvested in source countries where they are abundant, whether this is in contravention of the laws of these countries or not. At the consumption end of the trade chain, demand for wildlife and timber drives up prices and makes the risks inherent in illegal trafficking more viable as financial rewards more than compensate.

Connectivity matters – where integration into the global economy through trade routes and

infrastructure can be a positive force for development, these are also precisely the factors which enable illegal trades in timber and wildlife to flourish. In addition, these illegal activities and the illegal trade they fuel are possible because of weak enforcement, deficiencies in legal frameworks, corruption or a combination of these factors.

Legal frameworks

Wildlife and forest crime (WFC) may be dealt with under environmental laws, may not be recognised as a predicate offence for money-laundering and may be regarded as a ‘conservation issue’ rather than a serious and organised crime. It is now widely recognised that WFC is all too often a low-risk/high-reward crime that is transnational and organised in its nature. Some countries have adapted their legal frameworks accordingly to address this fact, but in some limitations in the legal framework – especially with regards to the severity of punishments available – do not help to address the low-risk/high-reward conundrum.

CASE STUDY: Cameroon

Cameroon has a high level of enforcement and conviction under the 1994 Forestry and Wildlife Law³¹. This covers flora and fauna crimes and categorises species under three classes, A, B and C. Under this law, an offender is liable upon conviction to a fine of between CFA 3,000,000-10,000,000, equivalent to between \$5,300-\$17,700³², and imprisonment for a term of one to three years under Article 158³³. The Ministry of Forests and Wildlife (MINFOF) is responsible for the effective enforcement of wildlife law. It often works in conjunction with the Last Great Ape Organisation (LAGA), a Cameroon-based NGO. While conviction rates are high, sentencing is lenient at best and thus unable to act as a real deterrent. An egregious example of this occurred when two Chinese nationals were sentenced to three months’ imprisonment by the Bonanjo Court of First Instance, Douala, in January 2017 after being caught with more than five tonnes of pangolin scales ready for illegal export³⁴. Cameroon continues to take action against wildlife crime. On 26 October 2020, 626kg of ivory, in the form of 118 elephant tusks, was seized by Cameroonian customs, coming from neighbouring Gabon. This is the single largest seizure of elephant tusks in Cameroon in recent years. EIA will be looking to see whether the scale of this crime is reflected accordingly in the convictions imposed upon those involved³⁵.

Weak enforcement

Twenty years ago, the UN General Assembly recognised the role of organised crime in trafficking flora and fauna. It advocated the application of the UN Convention against Transnational Organised Crime as an instrument for international cooperation to dismantle the networks involved, follow the money and seize assets. But it remains the case that much more could be done to tackle WFC by countries using the tools already available to them to disrupt other serious crime types.

However, there are also countries which have taken steps to address the low-risk/high-reward nature of WFC, leading to some success. This has relied on revisions to legal frameworks, along with the necessary resourcing of bodies capable of enforcing such rules.



Above: Conflicting laws in Nigeria create loopholes and confusion, limiting the possibilities for effective enforcement.

CASE STUDY: Nigeria

In Nigeria, conflicting laws create loopholes and confusion, making enforcement and multi-agency co-operation difficult. This is further exacerbated by a complex federal legislative framework under which both state and national authorities have the mandate to enforce laws. This lack of coherence in legislation has contributed to the poor level of understanding of the applicable legislation on wildlife and forest crime among key national law enforcement agencies such as the Nigeria Customs Service, Nigeria Police Force and the National Environmental Standards and Regulations Enforcement Agency (NESREA). The criminal justice response in dealing with wildlife and forest crime in Nigeria has been

extremely inadequate, exacerbating its role as a hub for criminal networks. For example, while there have been some arrests of wildlife traffickers in Nigeria, it appears that very few cases have resulted in prosecution and deterrent sentencing. However, Nigeria also has a strong framework for investigating financial crimes and corruption which could serve as important tools to tackle wildlife and forest crime. A recent study commissioned by the UK Government found that environmental crime, organised crime, smuggling, fraud and forgery are predicate offences under Nigerian laws enabling the application of anti-money laundering legislation³⁶.

CASE STUDY: Gabon

In Gabon, wildlife and forests are protected under the 2001 Forest Code, enforceable by the Ministry of Water and Forests. Revisions to the Forest Code in 2019 have increased maximum sentences from 3-6 months’ imprisonment to 10 years³⁷. A special unit known as l’Agence Nationale des Parcs Nationaux (National Parks Agency, or ANPN) was established on 27 August 2007 to manage Gabon’s 13 national parks. Within the ANPN, there is a 240-strong special forces unit, created by Presidential order, that is tasked with tackling poaching and other wildlife related crime within the parks³⁸. Former ANPN Director, Lee White was selected by President Ali Bongo to become Minister of Forests, Oceans, Environment and

Climate Change in 2019. Gabon are also in discussions with the European Union on a VPA, under which it would develop a timber legality assurance system. It has made conditional to licencing that all logging companies must be certified by the Forest Stewardship Council by 2022³⁹.

These latest actions show a strong degree of political will on behalf of the Gabonese Government towards tackling wildlife and forest crime. By prioritising and sufficiently resourcing efforts to protect Gabonese forests, it is demonstrating commitment to actively addressing the problems it faces with WFC.

Figure 8: Transparency International Corruption Perceptions Index 2019 Rankings

Country	Corruption ranking out of 179 countries (1 = least corrupt)
DEMOCRATIC REPUBLIC OF CONGO	168 / 179
REPUBLIC OF CONGO	165 / 179
CAMEROON	153 / 179
NIGERIA	146 / 179
MOZAMBIQUE	146 / 179
GABON	123 / 179
VIETNAM	96 / 179
CHINA	84 / 179

Corruption

When wildlife is illegally traded, corruption at ports, border crossings and airports is a pervasive enabling factor. This principally centres on corruption involving customs officials and law enforcement, but also includes port operators⁴⁰. Port and border crossing-related corruption also plays an important role in the illegal timber trade.

Traffickers in Africa and Asia move shipments of illegal wildlife commodities through ports, airport and border crossings. In many cases, this involves collusion, bribery and criminality affecting authorities charged with enforcing laws against WFC. This mode of petty corruption is seen by traffickers as a cost of doing business. Officials engaging in corruption do so for a variety of reasons, but significant among these is opportunity and the perception of a low likelihood of redress.

Multiple EIA public reports detail how timber traffickers exploit corrupt customs officials to move their shipments from ports and across borders; *The Rosewood Racket* (2017) details how Nigerian timber traders were able to smuggle kosso from Cameroon into Nigeria by paying bribes to police and the army at the border and on the road; *African Log Ban Matters* (2018) provided evidence of how traffickers in Mozambique exported more than one million tonnes of logs to China in violation of the export ban, creating a corrupt network of customs officials, shipping agents and harbour operators; *Cashing in on Chaos* (2020) demonstrates how rosewood traffickers bribe police and customs officials at each

of the 15-20 checkpoints between the border with Senegal and the port of Banjul in The Gambia, from where illicit timber is exported to China; and investigation findings shared in *Tainted Timber, Tarnished Temples* (2020) again showed the prevalence of corrupt customs officials and the ease of getting fake paperwork to clear illegal timber for export, so it can smoothly enter the supply chain on arrival in Vietnam.

The role of clearing agents

A clearing agent (also known as a customs agent or customs broker) is an individual (or entity) dealing directly with local customs authorities to ensure the release of imported goods at a port of entry or the release of goods for export at a port of origin. They handle customs declarations and arrange for the payment of customs duties and other relevant taxes⁴¹. Clearing agents require a licence to operate and are accredited with the local customs authorities, border agencies and ports⁴². They are also critical to criminal syndicates involved in wildlife and forest crime. In sub-Saharan African ports, corrupt clearing agents have relationships with officials in relevant agencies, knowing who to bribe, how to go about it and the rates for different types of illicit goods. EIA is aware of multiple clearing agents in Nigeria who specialise in facilitating the exports of illegal wildlife commodities by sea and air. These agents typically either have a relative who works in Nigerian customs or are current or former employees of the customs or port authorities themselves. EIA's *Mukula Cartel* report (2019) demonstrates how clearing agents also facilitate exports of illegal

timber in Africa. The report details how an influential Zambian trafficker of illicit mukula logs has an agent located at Walvis Bay port in Namibia who facilitates his exports.

The role of international shipping companies

Illegal wildlife and illegal timber are primarily moved between Africa and Asia by sea using international shipping lines. Illegal timber, ivory and pangolins/pangolin scales – given their bulk and the volumes moved together – are transported from Africa to Asia by sea. Rhino horn is predominantly transported from Africa to Asia by air, but sometimes also by sea.

Two shipping companies, Maersk and CMA CGM, dominate West Africa-Asia shipping routes⁴³, which are high-risk both for illegal timber and illegal wildlife. Given that shipping companies do not carry out checks on timber legality, the more containers a carrier ships on these routes, the higher percentage of illegal timber they are likely to be transporting. Employees of shipping companies can also be corrupted. EIA's *Cashing-In On Chaos* (2020) presented evidence of how Maersk, CMA CGM and MSC Mediterranean Shipping Company were all knowingly shipping illegal timber from The Gambia to China. The report led CMA CGM to implement a temporary ban on timber exports from The Gambia.

Below: Maritime trafficking is a significant transportation mode for both illegal wildlife and illegal timber.



High-level corruption

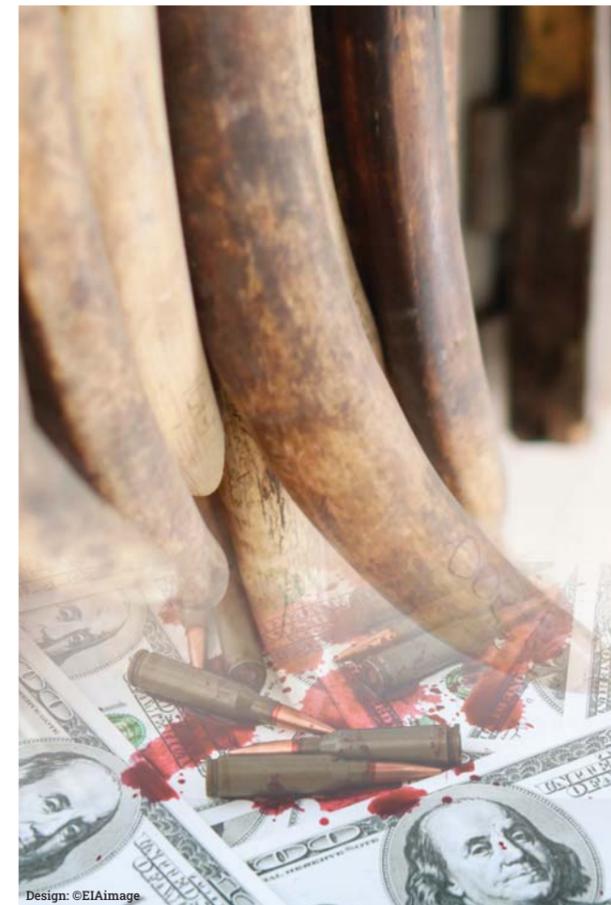
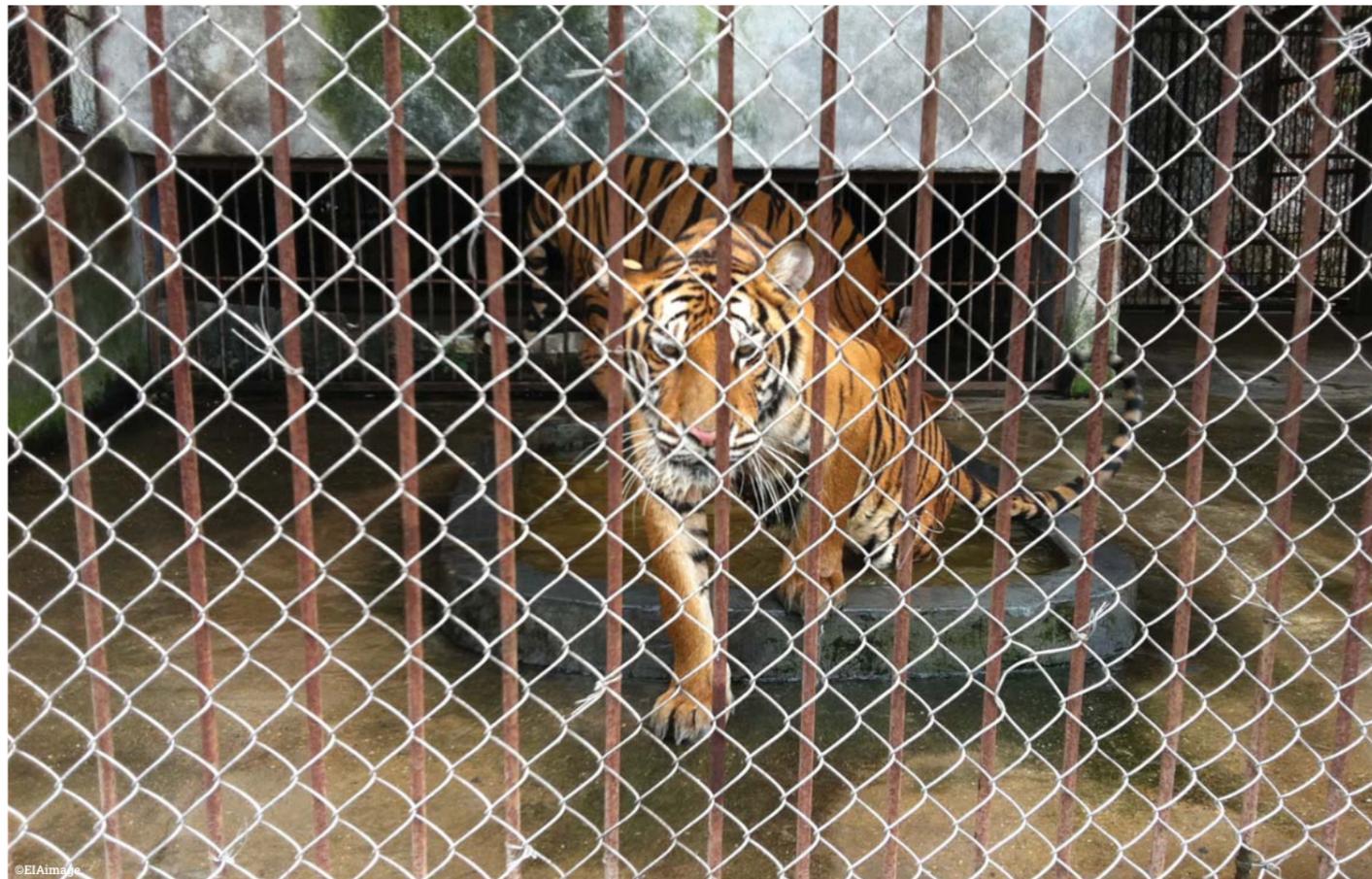
EIA has reported many examples of government ministers, senior public officials and even senior diplomats helping or providing protection to illegal wildlife traffickers, including in Gabon⁴⁴, Zambia, Angola⁴⁵ and Mozambique⁴⁶.

Powerful officials are able to issue permits and documentation despite obvious illegal activity, guarantee to criminal gangs no harassment by law enforcement and create ways to bypass customs checks or legislation.

CASE STUDY: The Shuidong route

EIA's 2017 report *The Shuidong Connection* demonstrated how a corrupt clearing agent in Busan, South Korea helped an ivory trafficking syndicate by issuing a new Bill of Lading for a 2.3 tonne shipment so that it could be sent on to Hong Kong without arousing the same suspicion as if it had come directly from its true origin of Pemba, Mozambique.

The clearing agent, who also carried out more general freight forwarding activities, was found to specialise in the forwarding of illegal wildlife trade shipments and charged different rates depending on the species, ranging from \$45 per kilo for pangolin scales to \$145 per kilo for ivory.



CASE STUDY: Moving dirty money

Networks identified by EIA were involved in the trafficking between South Africa, Mozambique, Malaysia, Laos, Vietnam and China of more than 25 tonnes of ivory, estimated to be sourced from 3,385 elephants. The network used a range of techniques to move money around to facilitate their crimes and recoup their profits:

A number of elements of the financial chain for this network were apparent. Chinese money changers in "Chinatown" in South Africa were responsible for sending and receiving funds to and from China. Payments to facilitate trans-shipment were made into a Malaysian bank account through Chinese underground banking.

The bank account details of the Chinese underground bank are valid for one day only and once the funds were deposited in China, the money was transferred to a bank account in Malaysia within two hours.

In Vietnam, a gold shop was used as an intermediary to offer a guarantees to those purchasing the ivory. Customers were required to make a deposit at the shop which the trafficker could then obtain in the event of non-payment for goods delivered.

CASE STUDY: Gabon and Republic of Congo – high-level corruption

In 2019, affiliates of the Chinese timber company Dejia Group were found by EIA to be operating a wide-ranging bribery scheme in Gabon and Republic of Congo to win forest concessions and illegally appropriate timber.

Representatives of SSMO routinely paid a wide range of officials, including the Minister of Water and Forests and the Governor of Haut-Ogoué Province.

SICOFOR, the company's affiliate in Republic of Congo, and SSMO, in Gabon, were found to have overharvested thousands of trees, illegally logged unauthorised species and exported hundreds of thousands of logs beyond their permitted export quotas. Representatives of SICOFOR told EIA investigators they would pay bribes to officials at all levels in Republic of Congo, from low-ranking civil servants to the Minister of Forest Economy.

Shortly after the public release of *Toxic Trade* in March 2019, the Gabonese Government announced that 350 containers of illegally logged kezavingo timber had disappeared from a Chinese-owned depot at the Port of Owendo after having been seized in February 2019. This led to a political scandal in Gabon, which came to be known as Kezavingogate and resulted in the dismissal of the Vice President, the Minister of Forestry and Environment and other high-ranking officials⁴⁷.

Tackling illicit financial flows
The importance of conducting financial investigations to interdict the criminal syndicates associated with wildlife crime is now a mainstream concept. The most recent estimates of the total volume of money generated by wildlife and forest crime⁴⁸ totals between \$50-180 billion, tantamount to a huge injection of dirty money flowing in and through the world's financial system.

Numerous important resolutions⁴⁹ in multilateral bodies have recommended action to tackle illicit financial flows and money laundered from WFC. Therefore the framework exists to take action, but such action is still relatively limited⁵⁰.

Under China's Presidency of the Financial Action Task Force from 2019-20, the international Anti-Money Laundering community developed its understanding of the illicit financial flows

Above: Large sums of illicit money from wildlife and forest crime are flowing through the global financial system.

associated with wildlife crime, starting from a low base in most jurisdictions. However, in many contexts forest crime and illegal logging are backmarkers for financial crime investigatory bodies and the anti-money laundering architecture.

Added to the low level of understanding of WFC, numerous hindrances exist to the possibility to deploy financial investigations:

- the absence of these crime types being on statute as predicate offences for money laundering;
- perceptions that these crimes are less serious and therefore lower priority;
- a lack of awareness of the 'red flag indicators' necessary to identify WFC financial flows, meaning low numbers of suspicious transaction reports being generated;
- lack of regulation of key elements of the financial system in most developing countries where WFC takes place;

- lack of collaboration between relevant agencies;
- lack of collaboration across borders to facilitate financial investigations;
- political factors which mean the institutions doing the investigating may not be able or willing to act with impartiality.

EIA has found notable similarities in the financial strategies of criminals engaged in WFC:

- significant use of cash in source countries to enable the payment of poachers, the small-scale purchase of equipment and for bribery necessary to secure the complicity of officials and politicians;
- a flow of funds back into Asian countries in which the most significant transnational organised criminal syndicates reside in or originate from;
- the use of front companies to obscure funds;
- the use of the formal banking system and money service businesses to move funds between Africa and Asia.

Illegal wildlife in the timber trade chain

In Africa and Asia, there is a significant convergence between the way illegal wildlife and illegal timber are traded and shipped; Traders in Africa and Asia deal in both.

How is the nexus evident?

Illegally sourced timber and wildlife products travel to and from similar destinations, require similar equipment to process and ship and rely on the same forms of bribery and corruption.

Those operating timber companies can thus maximise their profits with minimal additional work by engaging in the harvesting of both timber and wildlife products. Timber companies being managed by Vietnamese and Chinese individuals, based in Africa, present the highest likelihood of being engaged in the illegal sourcing or trading of wildlife. These individuals remain connected to their country of origin, understand the demand there and are therefore well-placed to shift between wildlife and timber products in response to prices.

Timber companies are convenient front operations for the illegal sourcing or trading of wildlife because – provided it is logged legally, is an unprotected

species and is moved following due processes – timber does not arouse suspicion.

Wildlife products can be placed among the timber in a container or disguised using more sophistication. One such method involves hollowing out logs before placing the items inside and then filling them with wax and resealing. Other examples include constructing crates to look like stacks of logs and filling the cavity with illegal wildlife products. Illegal timber species⁵¹ can also be trafficked as a commodity alongside wildlife.

Determining the extent of the use of timber companies as front operations is made complicated by the strategies that criminals use to hide their tracks. Bills of Lading, frequently hand-written, are easily altered to change the origin of the shipment, the commodity listed or the company responsible for shipping a container. This is done to ensure ‘red flags’ – such as high-risk country of origin or cargo – would no longer be visible.



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CASE STUDY: Syndicate trading timber and wildlife

A South-East Asian syndicate previously investigated by EIA used timber front companies and timber as a concealment method for transporting illegal wildlife products.

The syndicate set up operations in several countries in West and Central Africa. In some instances, it chose not to set up its own timber company and instead formed agreements with timber companies based in-country which would ship timber and illegal wildlife products on their behalf.

In the countries where the syndicate chose to set up its own timber operations, it ensured each company was registered to a different member of the syndicate – but all had the same ‘shadow’ director. It would first purchase a timber processing site and establish a company before specialist individuals would arrive to set up the equipment necessary. It was on these sites

that the syndicate would cut and prepare the timber, with methodologies for doing so differing between countries. In some instances, it involved packing hollowed logs with illegal wildlife products or in others using logs or square cut logs to conceal illegal wildlife products inside the container.

Timber was used as a method of concealment for both in-country transport of illegal wildlife products as well as transporting to Asia. Under the guise of a timber company, and often with amended Bills of Lading, these containers were then shipped out to customers in Asia via the hotspot routes noted in the section above. The choice of timber and wildlife product also varied depending on what is prevalent in the country of operation and its neighbours and was largely sourced externally through middle men interacting in turn with poachers.



Above: Ivory is concealed within timber when it is trafficked. Timber shipments are relatively easy to move through ports with minimal scrutiny.

Trends in the wildlife/timber trafficking relationship

The COVID-19 pandemic has led to fewer seizures of large-scale shipments, making it difficult to determine current trends. Concurrent to this, timber exports are subject to growing restrictions. For example, after an investigation lead by EIA uncovered the illegal rosewood trade between Nigeria and China, the CITES Standing Committee agreed on a trade suspension on rosewood from Nigeria effective from 1 November 2018⁵².

Demand side legislation affecting the timber industries in key countries could also have an impact, largely through mandating stronger checks on timber imports. At the end of 2019, China amended its Forest Law to include a nationwide ban on buying, processing or transporting illegally sourced timber⁵³, although it is not clear how this will affect imported timber. Vietnam too has recently established a new timber legal assurance system, but this is in its very early stages⁵⁴.

Deforestation and poaching

How is this nexus evident?

Illegal logging and land clearance pose numerous threats to the environment, including habitat destruction and loss of biodiversity as well as leaving wildlife vulnerable to poaching for consumption and trade⁵⁵. There is also a significant link between logging and the decimation of certain species within forested areas^{56,57}.

Poaching has been found to have been carried out by employees of logging companies, which view wildlife as a free subsidy that can be used towards feeding their workers. In Sarawak, Malaysia, it was found that bushmeat was present in 49 per cent of meals in logging camps, as opposed to 29 per cent of meals in the interior^{58,59}.

Subsistence hunting also occurs outside of these camps, with locals utilising wildlife as a food source. However, rampant deforestation across South-East Asia has been related to an increase in commercial poaching, potentially by those who were previously subsistence poachers. Traps and snares made with cables from bicycles or other vehicles capture animals indiscriminately, including leopards, deer, wild boar and bears.

Logging access roads, designed to facilitate the transportation of resources into and out of concessions, serve as a conduit for poaching. Poachers can enter the forest using these access roads and, either by placing traps or using guns, can hunt a wide variety of species. These areas of forest also happen to be those where animals have retreated to seek refuge; they therefore have relatively dense wildlife populations, which in turn attracts poachers.

CASE STUDY: Poaching and forest loss

Within protected forested areas in Cambodia, the number of traps put down has increased alongside the diminution of forests; 17,175 traps were removed in 2019, which is 5,000 more than in 2018⁶⁰. Comparatively, within these protected areas, 71.8kha of tree cover was lost in 2019, compared with 50.4kha in 2018⁶¹. The scale of growth of these poaching activities most likely indicates some form of commercial trafficking.



Above: Deforestation is a key driver of poaching as it opens up previously inaccessible areas of forest.

Trends

The impact on livelihoods stemming from the COVID 19 pandemic has led to an increase in poaching and illegal logging to provide a form of subsistence for communities⁶⁶.

And with job losses set to hit rangers in some countries in the coming months, poaching cases could continue to rise for the foreseeable future, with experienced poachers and illegal loggers capitalising on this opportunity⁶⁷.

Lockdowns have led to reductions in tourism in many places. This has reduced the revenue available to fund conservation efforts and reduced the presence of members of the public and tourists in conservation areas, who would otherwise act as an additional deterrent for potential poachers.

COVID-19 has stimulated responses targeting the wildlife trade which could reduce poaching. Vietnam, for example, announced it had banned all imports of wild animals including eggs, organs and other body parts, as well as a crackdown on illegal wildlife products⁶⁸. Again, it is too early to determine the effectiveness of such measures and significant caution should be made prior to any positive conclusions, given the scale and centrality of Vietnam to the illegal wildlife trade.

CASE STUDY: Minkebe Park in Gabon



In Gabon's Minkébé National Park, the impact of access roads became evident when the elephant population started to dramatically deteriorate from the early 2000s. A study observing this decline between 2004-14 noted that poaching in Minkébé was lowest in the park's southern end, where the closest Gabonese road is 58km away. By contrast, the north-eastern corner, which is 6km from a main road in Cameroon, had been almost cleared of elephants⁶².

Intensive logging up to the Gabonese border has made the northern region of Minkébé Park easily accessible to Cameroonian poachers, whereas this area takes days of hiking to reach through Gabon⁶³. This example is illustrative of the situation occurring across the Congo Basin as industrial logging continues to expand⁶⁴. A 2019 study showed that between 2003-18, within the Congo Basin, the length of logging roads doubled within concessions and rose by 40 per cent outside of concessions, growing by 87,000km. Deforestation

rates were highest within 1km of old roads (referring to roads built before 2003), at approximately four times what they were at the beginning of the 21st century.

Several key species have also dropped off considerably, most notably the population of forest elephants is one-third of what it was only 10 years ago.

It also found logging companies with licenses to harvest trees abandoned 44 per cent of logging roads inside concessions over the same period. These abandoned roads are very rarely shuttered off and are no longer managed by the logging company, leaving them open to be used by hunters and illegal loggers⁶⁵. If these roads were instead decommissioned after use, including road surface decompaction, it would not only reduce opportunities for illegal loggers and poachers, but could also allow for active forest restoration.



Making progress

There are important opportunities to make progress against wildlife and forest crime in 2021, by strengthening action against corruption and setting ambitious goals for the preservation of biodiversity. The UK Government could also continue to play a significant part in this fight by taking bilateral action.

Tackling corruption

Owing to the COVID 19 pandemic, environmental crime has been pushed up the agenda for many multilateral discussions. The recent resolution adopted at the 10th Conference of the Parties to UNTOC⁶⁹, amid debates about a 4th UNTOC Protocol on wildlife crime⁷⁰, is evidence of this. The Crime Congress in Kyoto scheduled for March 2021 could see productive engagement to take forward these debates and the focus of the UN system on environmental crime.

Next year offers the chance to build further. The UN General Assembly will host a Special Session (UNGASS) dedicated to anti-corruption. Through momentum generated by the CITES COP17 resolution on combatting corruption associated with WFC⁷¹ and building on recognition of environmental crime within the UN Convention Against Corruption (UNCAC) through a specific

resolution in 2019⁷², proponents of action to combat WFC could bring forward specific discussions to bring about further political will to combat the petty and high-level forms of corruption noted in this report.

The role of trafficking through ports could be raised in discussions on combatting corruption. EIA and other NGOs, under the auspices of the United for Wildlife Transport Task Force, will be working in 2021 to support a Kenyan proposal to the International Maritime Organisation to develop Guidelines to prevent the smuggling of flora and fauna along maritime routes.

Efforts to combat financial flows from wildlife and forest crime will continue at the Financial Action Task Force. As President, Germany has made environmental crime a theme of its tenure⁷³, with money laundering associated with illegal logging a priority.

Biodiversity

The 15th Convention of Parties to the UN Convention on Biological Diversity should take place in Beijing in 2021. With China acting as host, the CBD offers the opportunity for the Chinese Government to show global leadership, particularly given its Belt and Road Initiative could lead to massive expansion of infrastructure into areas of value for biodiversity and make trafficking routes more connected to one another⁷⁴.

China is the primary market for the focal species in this report and for illegal timber and thus any meaningful action to combat both needs to be done with China as a partner, acknowledging its current role and taking ambitious steps to address it. Recent efforts to tackle wildlife crime have fallen short of steps necessary by overlooking domestic markets for threatened species⁷⁵.

In addition to the CBD, there are several significant regional initiatives⁷⁶ which target countries identified as hotspots for the WFC nexus. Enhancing forest governance through these initiatives could have a knock-on effect on poaching levels and thus an impact on the illegal sourcing and trading of wildlife.

Global Britain

As the UK articulates its vision for 'Global Britain', it could continue the significant role it has played in harnessing political will to fight wildlife and forest crime. The UK hosted the first of a series of global summits in 2014 and has sought to ensure the issue is raised in appropriate forums since then, including UNCAC. It also took a leading role in the global fight against corruption when hosting the International Anti-Corruption Summit in 2017.

The UK is at the forefront of pushing 'nature-based solutions' to combat climate change and plans to host the 26th UN Climate Change Convention of Parties in 2021. New UK domestic regulations on forest commodities could, if sufficiently robust, help reduce downstream deforestation. As well as combatting climate change and generating important ecosystem services⁷⁷, progress on reducing deforestation could help reduce the illegal wildlife trade.

The UK has stated its desire to clean up its financial system against the proceeds of crime flowing into it. The use of Unexplained Wealth Orders and a new UK Sanctions regime could be used to target individuals and syndicates prosecuting WFC. Given the influx of wealth into the UK property market from Chinese buyers⁷⁸ and the prominence of Chinese individuals and syndicates in WFC, there are likely proceeds of WFC being laundered through the UK.

Recommendations

National governments acting bilaterally and in multilateral processes must address a range of issues that this report brings to light.

Design responses against wildlife and forest crime by understanding the nexus between them

- All countries should be held to account for commitments already made but not delivered in the fight against wildlife and forest crime
- All countries, particularly those noted in this report as hotspot countries for wildlife and forest crime, should complete the ICCWC Wildlife and Forest Crime Analytic Toolkit to identify specific weaknesses in their current approaches to WFC and identify improvements that could be implemented
- Assess progress in combating wildlife and forest crime in reviews of implementation of the UNCAC and UNTOC and consult with civil society organisations with specialist knowledge of WFC to do so

Governance and legal frameworks

- Use results from the ICCWC assessment and those under UNCAC and UNTOC to develop and publish action plans and direct resources to deliver results against them
- Clearly define sentencing guidelines for wildlife and forest crime and carry out prosecutions under relevant national laws which specify the most severe penalties
- Hotspot countries identified in this report should be targets for the development of robust timber legal assurance systems, in the manner supported through the EU FLEGT VPA process⁷⁹

Law enforcement

- Establish National Environmental Security Task Forces⁸⁰ or similar multi-agency bodies mandated to combat both wildlife and forest crime
- Target intelligence led policing efforts to disrupt WFC at specific locations identified in this report falling under their jurisdiction
- Focus efforts on the tackling of corruption to disrupt wildlife and forest crime on ports and specifically those ports identified in this report
- Use existing mechanisms to facilitate international/cross border cooperation between different law enforcement agencies, including support from INTERPOL and use of UNTOC, World Customs Organisation and UNCAC

Tackling maritime trade routes

- Countries which are members of the IMO should support the Guidelines brought to the International Maritime Organisation by the Government of Kenya⁸¹
- Alongside efforts at the IMO on a voluntary set of guidelines, shipping companies can themselves adopt measures. Such measures could include blacklists of the kind noted in this report and implemented by CMA-CGM, following EIA reporting on timber trafficking out of The Gambia.
- Shipping companies should follow practices initiated by the likes of Maersk and MSC to use data-driven systems to red flag potentially suspicious cargoes, adopting practices used in the tackling of other forms of smuggling such as drugs or human trafficking⁸²
- This could lead to a sector-wide standard 'flagging system' being developed and universally used

Tackling financial flows

- Members of the FATF should note the opportunity to increase understanding of financial flows derived from wildlife crime forest crime
- National Risks Assessments identifying money laundering risks undertaken by countries identified in this report should note WFC risks
- Countries identified in this report which are also subject to FATF enhanced scrutiny/'grey listing' could take action to prosecute those responsible for wildlife and forest crimes through financial crime investigations
- Financial institutions and designated non-financial businesses and professions should continue to work with competent authorities to enhance their understanding of financial flows from wildlife and forest crime

Eradicating markets

- Improve legislation to close domestic markets for wildlife species threatened by commercial trade, including the species featured in this report
- More research into drivers of consumer demand should be undertaken, leading to more demand-reduction campaigns, targeting in particular Chinese and Vietnamese consumers, including those making purchases in third countries



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