

# INVESTIGATOR

Autumn • 2022

**eia** environmental  
investigation  
agency

A bold new project helping  
artificial intelligence learn  
how to safeguard tigers

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investigation  
agency

It's been a whale of a time  
for whale and dolphin  
conservation!

EU closes in on a new law  
to curb its deforestation  
footprint

We call for probe into  
Europe's black market in  
climate-damaging gases





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## INTRODUCTION



Welcome to the Autumn 2022 *Investigator*, keeping you abreast of our activities and successes.

Inside, you can read about an exciting project we've launched with the Alan Turing Institute to develop a new artificial intelligence tool to identify individual tigers by their stripe patterns, as unique as fingerprints are to humans.

We believe this tool will be of invaluable help in identifying tigers and their skins found in illegal trade, as well as revealing possible sources and trafficking systems.

You'll also find news of all the major activities and outputs of our busy campaign teams.

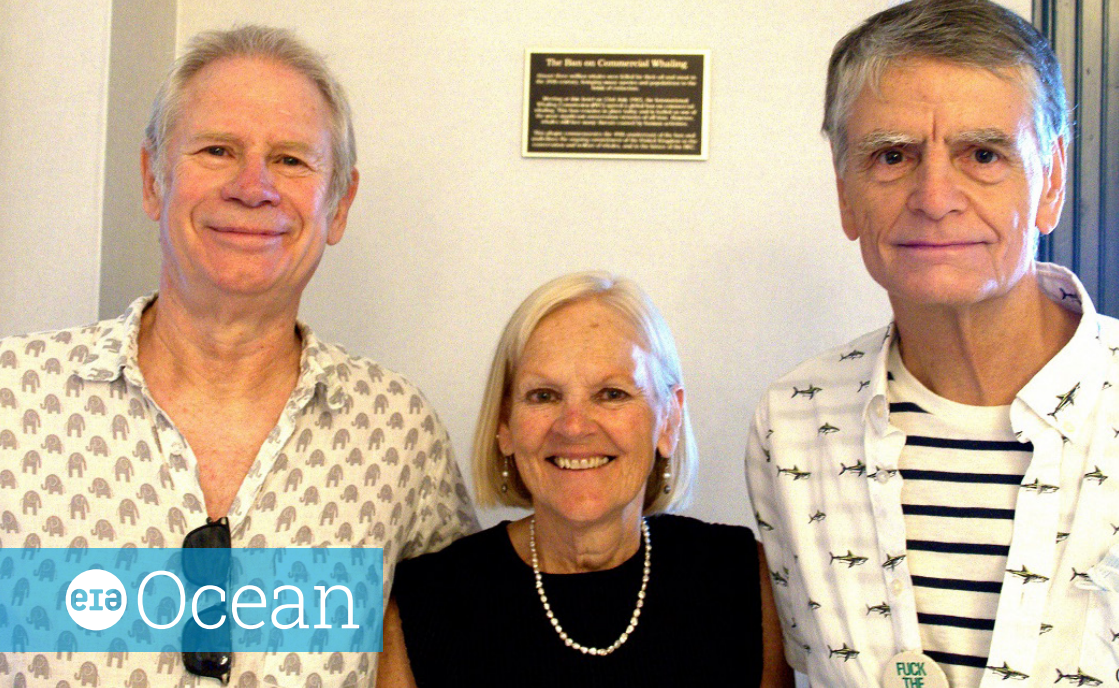
Once again, my sincere thanks for all your support – without it, we simply couldn't achieve so much in our mission to protect the natural world from crime and abuse.

**Mary Rice, Executive Director**

62-63 Upper Street, London N1 0NY  
T: +44 (0) 20 7354 7960  
E: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)  
[eia-international.org](https://eia-international.org)

Environmental Investigation Agency UK  
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## It's been a whale of a time for cetacean conservation!

On 23 July 1982, contracting governments to the International Whaling Commission (IWC) voted by 25 to seven for a global ban on commercial whaling.

Commonly known as 'the moratorium', the ban put in place at the meeting in Brighton's Metropole Hotel has come to be regarded as one of the most important conservation decisions of the 20th century and is as important today as it was four decades ago.

EIA's three co-founders – Dave Currey, Jennifer Lonsdale and Allan Thornton – joined others in July at the same venue, now named the Hilton Metropole, for a special event to commemorate and celebrate the landmark decision.

A permanent memorial plaque was

unveiled in the hotel lobby by James Smith, UK Commissioner to the IWC. In his speech, he reaffirmed the UK Government's commitment to the conservation and welfare of whales and dolphins and the future of the IWC and announced a new UK contribution of £300,000 towards its conservation work and operating costs.

Afterwards, Jennifer said: "EIA sincerely thanks the UK for its enduring work with the IWC and the commitment to its future.

"This contribution will make a real difference for cetaceans and the IWC.

"It was particularly moving as I was joined by the other two co-founders of EIA, a proud moment to reflect on our history working with the IWC to gain greater protection for cetaceans and ensure the moratorium has remained in place – and it was lovely to all be together again!"

"When the three of us founded EIA, we immediately started working with the IWC and are as committed to its work today as we were in the 1980s." ●

Opposite page: EIA founders, from left, Dave Currey, Jennifer Lonsdale and Allan Thornton in Brighton

## Greenwashing not enough to tackle soft plastics pollution

Some UK supermarket schemes to address the mounting problem of soft plastics pollution are failing to adequately address the issue.

In June we released the new report *The Great UK Soft Plastics Scandal*, warning that this serious shortcoming, combined with inadequate current Government policy, could result in greenwashing being substituted for meaningful action.

The prevalence of soft plastics – which can include products such as plastic carrier bags, bread and cereal bags, cling film, bubble wrap, magazine wrap and shrink wrap (for multi-pack products such as drink containers, tinned food and toilet paper) – is a particularly concerning aspect of the ongoing global plastics crisis.

Our research also revealed how a fund set up by some of the world's largest brands to encourage UK soft plastic recycling has yet to pay out a penny and exposed how a potential conflict of interest whereby an MP paid to chair a packaging industry lobbying group can directly influence a Parliamentary group he also chairs. ●



Above: A soft plastics recycling collection point at a UK supermarket

### OCEAN NEWS IN BRIEF

- New EIA-funded research in August showed that prioritising the perspectives of indigenous caretakers, rather than others with vested commercial interests, is crucial to reversing plastic pollution and ending the exploitation of the Pacific Islands as a dumping ground.
- In April, we wrote to Iceland Prime Minister Katrín Jakobsdóttir, calling on her to intervene and prevent the resumption of commercial whaling in the country after a three-year hiatus.



## EU closes in on a new law to curb its global deforestation footprint

The EU Parliament has backed the European Commission's long-awaited proposal for a new law seeking to stop commodities produced through deforestation or human rights abuses from being placed on the bloc's markets.

The proposal, which got Parliament's vote in September, will focus on products such as palm oil, beef, leather, soy, cocoa, coffee and timber.

EIA welcomes this proposal and has been urging EU policymakers to adopt such a law for more than five years.

Our Forests team, working in close collaboration with coalition partners in Brussels, has produced several joint briefings and held many meetings with the Commission, the Council and Members of Parliament.

The efforts received a further boost in April when 35 Indonesian environmental groups – led by EIA's Indonesian partner Kaoem Telapak – announced their support for an

ambitious new EU regulation seeking to clean up its consumption of commodities linked to deforestation.

In a joint statement, the groups further called for additional roles for independent smallholders and the protection of indigenous people's rights.

EIA Forests Campaigner Vanessa Richardson said: "Recognising its role in consuming commodities produced through deforestation, the EU is now moving forwards to ensure consumers can safely purchase these forest-risk products."

"The law proposes a new due diligence regulation for companies so they can make certain these commodities and products can only be sold and exported

## A partnership forged over two decades to fight forest crime

When society was upended by pandemic lockdowns in 2020, EIA and others had to find new ways to work effectively – and, as if that wasn't challenge enough, our Forests team set out to make a feature-length film!

The resulting documentary *Indonesia – Fight for the Remaining Forest* featured hard-hitting investigative videos, news reports and contextual interviews to chronicle the work over 20 years of EIA and our partner Telapak (now Kaoem Telapak) to stop the illegal destruction of Indonesia's forests.

Campaigners past and present from both organisations were joined by guests in July for a special premiere screening of the film at the Prince Charles Cinema, off Leicester Square, London. ●

Below: Forests campaigners Mardi Minangsari and Faith Doherty at the London premiere of their film



to and from the EU if they are free from deforestation, degradation and human rights abuses.

"The EU Parliament's position is a step in the right direction – it goes beyond the Commission's already ambitious proposal and is largely in line with what EIA and more than 100 civil society organisations

around the world have been campaigning for."

The proposed regulation's final text will now be jointly negotiated by the EU's three institutions, the Council, Commission and Parliament. ●

Opposite page: Deforestation due to land clearance for oil palm production in Indonesia





## Convicted German trader investigated by EIA is raided for again dealing illegal teak

Information supplied by EIA's Forests team led authorities in Germany to raid the private villa of timber trader Stephan Bührich and the premises of a company of which he was previously a director.

The raids in April took place amid fresh allegations concerning 10 counts of illegally trading Myanmar teak into Germany via Croatia.

Bührich is the former director of WOB Timber in Hamburg, a company previously investigated by EIA for exploiting regulatory loopholes to

trade illicit timber in circumvention of the EU Timber Regulation (EUTR).

The EUTR requires those placing imported timber onto the bloc's marketplace to conduct due diligence from stump to shipment – something not possible under Myanmar's opaque logging and timber trading system.

Timber imports from Myanmar are now doubly illegal under sanctions put in place in response to the country's military coup in February last year.

The German raid seized a total of 111 cubic metres of teak worth more than €1 million from two locations owned by WOB Timber, suspected to be illegal Myanmar teak smuggled via Croatia. Company assets worth €1.7 million were also seized.

Our 2020 report *The Croatian Connection Exposed* identified WOB Timber as one of several firms using Croatian outfit Viator

Pula to import timber from Myanmar and attempt to avoid the EUTR's due diligence requirements.

The Regional Court in Hamburg previously found WOB Timber had evaded earlier EU sanctions against the previous military junta on 31 separate shipments of timber worth millions of euros from 2008-11.

For this earlier offence the company was fined €3.3 million and director Stephan Bührich sentenced to a 21-month suspended jail term and a fine of €200,000.

EIA Forests Campaigns Leader Faith Doherty said: "This is a great result and a clear signal to the rest of the industry that it is absolutely unacceptable for European firms to import blood wood from Myanmar." ●

Opposite page: "Good morning, this is the Wood Police." How German news platform *Bild* reported the raid.

**RAZZIA IN ALSTER-VILLA**  
**Guten Morgen, hier ist die Holz-Polizei**

## CITES acts to shut down the rosewood racket from West Africa

In June, we were delighted to join with our EIA US colleagues to welcome the immediate suspension of international trade in West African rosewood.

The historic move by the UN Convention on International Trade in Endangered Species (CITES) effectively bans commerce in what has become the world's most trafficked natural commodity.

The suspension applies to all 16 source countries, including the current top

exporters Sierra Leone, Ghana, the Gambia and Mali.

EIA's focus on rosewood trafficking goes back more than a decade to when EIA UK made the case in *Rosewood Robbery* for Thailand to list Siamese rosewood (*Dalbergia cochinchinensis*) on CITES due

to unsustainable illegal logging to supply demand from China.

The new suspension is binding for all 184 CITES member states – including importing countries such as China, which can no longer accept shipments of illegal West Africa rosewood (*Pterocarpus erinaceus*).

China has been the main consumer of rosewoods to feed its lucrative domestic market in high-end reproduction furniture, known as Hongmu. ●

Right: Timber market in Xinhui, Guangdong Province, China



## We call for probe into the Europe's black market in climate-damaging gases

More than a year after our Climate team exposed Europe's alarming illegal trade in climate-damaging hydrofluorocarbon (HFC) refrigerant gases, we have urged a formal investigation into the growing black market and lack of enforcement.

Our 2021 report *Europe's Most Chilling Crime* revealed Romania to be a major illegal entry point into the EU.

But despite providing hard evidence to the authorities in Romania, the country has failed to act – compelling EIA to urge the European Public Prosecutor's Office to launch a probe into the ongoing smuggling of harmful greenhouse gases.

HFCs are industrial refrigerant gases used in, among other things, air-conditioning and supermarket cooling units.

As part of a gradual phase-down in using HFCs, the European Union has introduced a quota system via its F-Gas Regulation to progressively limit the volume of these greenhouse gases on the market.

It cut the supply by 37 per cent in 2018, which caused prices to skyrocket and led to a burgeoning black market in Europe

which enforcement agencies have been slow to tackle.

Our report was the first to expose how illegal cylinders of Chinese-made HFCs entered Romania via Ukraine and Turkey and were then shipped around the continent through courier services and even in the luggage compartments of transnational coaches.

Apart from identifying the smuggling routes, we also named the individuals and companies involved.

Senior Climate Campaigner Fionnuala Walravens said: "Despite giving Romanian law enforcement our evidence 12 months ago, no action appears to have taken place.

"The illegal trade not only jeopardises the achievement of the EU's climate objectives, but it has also resulted in the loss of approximately €77 million a year in VAT and customs duties.

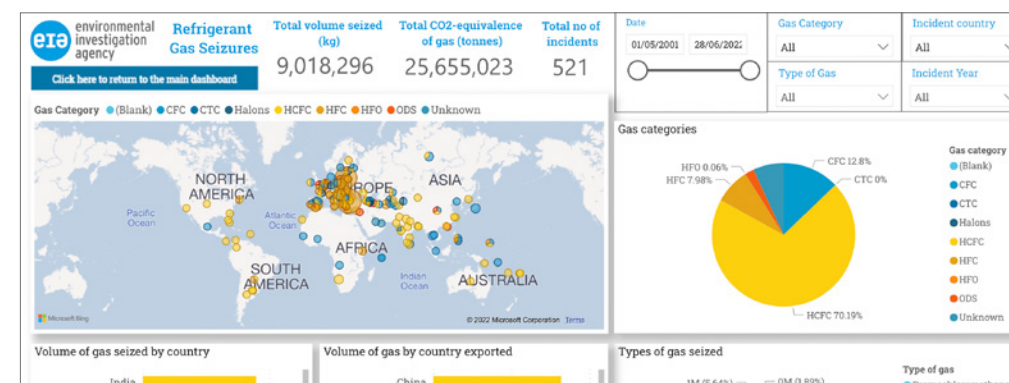
"So, in a first for EIA, we have now asked the European Public Prosecutor's Office, which exists to protect EU taxpayers' money from criminals, to investigate this growing black market in greenhouses gases."

Losses to legitimate businesses are significant. In 2020, Europe's five major HFC manufacturers noted that illegal imports cost about \$500 million in lost profits per year. ●

Left: Part of a seizure of illegal cannisters.

### CLIMATE NEWS IN BRIEF

- In May, we asked why UK supermarket giant ASDA was opting for climate-damaging air-conditioning systems after learning it had recently installed rooftop cooling units using a potent climate-harming refrigerant.
- Against a backdrop of record-breaking heatwaves this summer, we used June's World Refrigeration Day to spell out the importance of keeping cool without resorting to technology which further worsens the climate crisis.



## Keeping track of climate crime

After unveiling our first-of-its-kind Global Environmental Crime Tracker in June, we have now updated this amazing resource to keep tabs on illegal trade in climate-harming gases.

The Tracker – developed by EIA's Intelligence Team – is free to use, open to all and was launched with detailed resources on seizures of Asian big cats, elephant ivory, rhino horn, pangolins, totoaba fish and timber.

The new global refrigerant seizure tracker was added in April and contains information dating back to 2001. ●

Above: The section of our Global Environmental Crime Tracker that deals with refrigerant gases





# A bold new project helping artificial intelligence learn how to better safeguard tigers

International Tiger Day on 29 July was a particularly special occasion this year – as well as falling in the Year of the Tiger, it also saw the launch of a landmark new EIA project to help protect tigers using artificial intelligence.

In partnership with the world-renowned Alan Turing Institute, a leading UK centre for data science and artificial intelligence, we are developing a bold new AI tool to contribute to law enforcement efforts by creating an extensive database of tiger stripe patterns.

Alongside the launch, we also issued a call for any interested parties – from citizen scientists and fellow wildlife campaigners to photographers – to submit their images of tiger stripe patterns to help teach the AI how to analyse them.





## Why tiger stripe patterns?

There are an estimated 4,500 endangered wild tigers remaining throughout Asia, with seizures and trade analysis indicating that poaching to feed consumer demand is still a major threat to their survival.

Of mounting concern are those tigers being held and sometimes bred in captivity; it is currently estimated that more than 7,000 are kept in facilities in China, South-East Asia and South Africa. The vast majority of these places provide no benefit whatsoever to wild tigers and no tiger bred in them has ever been released to the wild.

But captive tiger facilities pose an even grimmer threat – far from helping to

protect the species, many such facilities have been implicated in illegal trade in tigers and their parts and derivatives, feeding an insatiable demand that drives the poaching of wild tigers and other big cat species such as leopards, lions and jaguars.

The opaque nature of these facilities effectively creates a black hole for clandestine tiger trade, with very little credible official oversight or monitoring.

And that's where tiger stripe patterns come in.

Every tiger's individual stripe pattern is as unique as fingerprints are to humans and it is the ultimate goal of this project to create a global database which will allow the patterns of tigers everywhere to be accessed and compared to skins and animals found in illegal trade.

EIA Tiger & Wildlife Crime Campaign Leader Debbie Banks said: "Such a database would be of huge benefit to law enforcement agencies and researchers.

"Not only will this help trigger and facilitate cooperation with different

enforcement bodies around the world, it would also go a long way to exposing the workings and shadowy connections of the illegal transnational tiger trade."

EIA already has a database of hundreds of images of tiger skins (rugs, taxidermy specimens, carcasses) and our Wildlife team has also been gathering data from open-source images of seized tigers.

We know other organisations and researchers also collect such images, but the difficulty comes when we swap images in an attempt to identify specific individual animals as it currently involves a manual scan to determine if there is a match.

Left and below: Tigers in captivity and consumer demand for their products remain an ongoing threat to the survival of the iconic species in the wild





# The Alan Turing Institute

The Alan Turing Institute is named after the pioneering computer scientist and philosopher who helped crack Germany's Enigma Code during World War Two, saving many thousands of lives.

His likeness currently appears on the UK's £50 banknote and his pioneering work in theoretical and applied mathematics, engineering and computing are considered to be the key disciplines comprising the fields of data science and artificial intelligence.

In June 2021, the Institute was awarded £10 million new funding by the Engineering and Physical Sciences Research Council to strategically invest

in key areas for the future of AI and data science in the UK.

It is from this funding that a Turing-sponsored doctoral researcher will spend six months working with EIA and using the images to develop the technology; the project will also be taken up by a longer-term Turing Data Study Group.

**Below: The Alan Turing Institute is headquartered in the British Library, London**



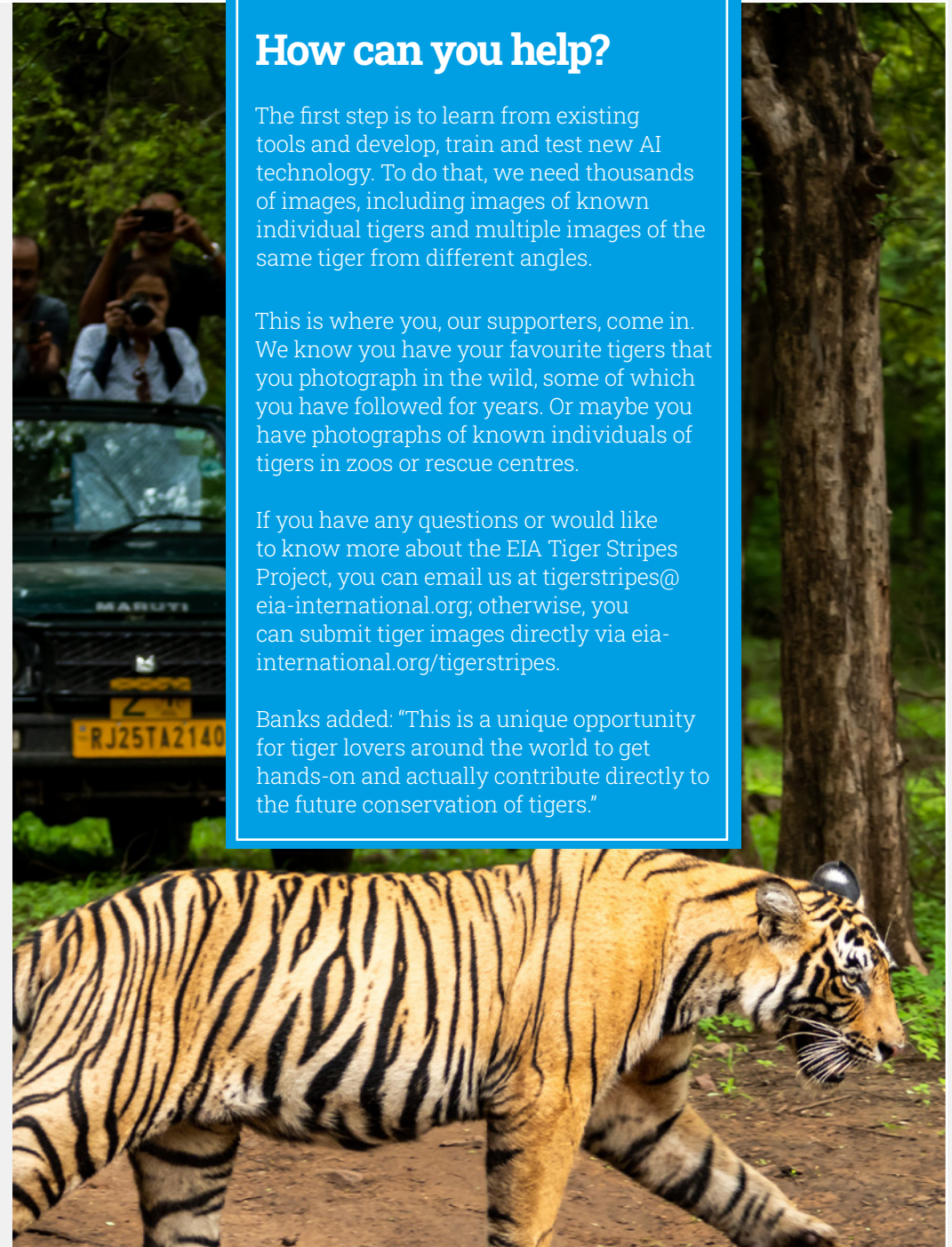
## How can you help?

The first step is to learn from existing tools and develop, train and test new AI technology. To do that, we need thousands of images, including images of known individual tigers and multiple images of the same tiger from different angles.

This is where you, our supporters, come in. We know you have your favourite tigers that you photograph in the wild, some of which you have followed for years. Or maybe you have photographs of known individuals of tigers in zoos or rescue centres.

If you have any questions or would like to know more about the EIA Tiger Stripes Project, you can email us at [tigerstripes@eia-international.org](mailto:tigerstripes@eia-international.org); otherwise, you can submit tiger images directly via [eia-international.org/tigerstripes](http://eia-international.org/tigerstripes).

Banks added: "This is a unique opportunity for tiger lovers around the world to get hands-on and actually contribute directly to the future conservation of tigers."





## Renewed threat to elephants from fresh efforts to reopen ivory trade

In May, we were alarmed to see a new attempt by several Southern African nations to reopen the global ivory trade via another 'one-off' sale of stockpiled tusks and warned this could mean disaster for threatened elephants.

At the end of the month, Zimbabwe hosted a four-day Elephant Summit in Hwange National Park to rally support to restart the international ivory trade ahead of the 19th meeting of the Conference of Parties (CoP19) to the Convention on International Trade in Endangered Species (CITES) in November this year.

Along with countries including Botswana, Namibia, South Africa, Tanzania and Zambia, the main aim of the event was to lay the groundwork which would allow them to sell off stockpiled ivory.

Fortunately, the meeting failed in its attempt to secure a unified voice.

The Summit did issue a preliminary statement, purportedly the Hwange Declaration on the Conservation of the African Elephant, which outlined multiple action points relating to elephant management and research, the use of wildlife resources, human-elephant conflict and CITES.

However, on reading the statement the intentions of its signatories became clear – certain African countries responsible

## UK ivory ban finally comes into force!

After several years of tireless campaigning spearheaded by EIA, 6 June finally saw the UK Ivory Act come into force, effectively outlawing all legal ivory trade apart from a few narrow exemptions.

EIA led a coalition of environmental groups to secure the Act, which became law in December 2018, after our research revealed in 2017 that the UK was the world's leading exporter of antique ivory.

It is now illegal to deal in almost all items made of, or containing, elephant ivory, regardless of their age. There are a number of carefully crafted, limited and certified exemptions, which include portrait miniatures, musical instruments, items with low ivory content, sales to qualifying museums and rare/important items.

Penalties for dealing in ivory now include fines of up to £250,000 or up to five years' imprisonment.

In a joint statement, we strongly urged Japan – the largest remaining legal market for ivory since China closed its market – to follow suit. ●

Right: EIA and friends raise awareness outside the Royal Courts of Justice, London, 2019

for managing elephant populations believe they alone should be allowed to decide how elephants and their parts are utilised, managed and disposed of.

Afterwards, EIA and 45 other organisations issued a joint statement calling on pro-trade countries on the continent to abandon the attempt and instead align themselves with both the majority position in Africa and globally, which stands firmly against



ivory trade and live elephant sales.

The statement concluded: "While the Summit's stated goal was to develop a unified 'African' voice for elephants, such a unified position already exists in that the majority of African elephant range states do not support the re-opening of ivory trade, including from stockpiles." ●

Opposite page: Stockpiled ivory being destroyed at a public event in Kenya, 2016



## Pangolin trade investigation exposes serious regulatory gaps

Legal loopholes in wildlife trade between Uganda and China could facilitate an illicit shadow trade in the scales of endangered pangolins.

Our April report *Lethal Loopholes – Global traditional Chinese medicine interests and the trade in pangolins between Uganda and China* gave the warning after examining the case of a Chinese businesswoman who set up shop in Uganda.

Despite the activities of Ma Jinru coming to the attention of authorities in the East African country on several occasions – including her arrest for possessing a large stockpile of pangolin scales – no conclusive legal action was ever taken against her shadowy operation.

However, our Wildlife team was concerned that her case exposes fundamental flaws in the trade system between both countries which may be exploited to trade the illegally sourced scales of endangered pangolins, the most widely trafficked mammal on the planet.

Wildlife Campaigner Ceres Kam said: "Ma Jinru may have avoided prosecution, but her activities indicate a credible risk that illegal trade may have occurred and further expose significant loopholes which need to be closed as a priority."

Ma Jinru moved to Uganda in 2013 to establish a pangolin trade operation, ostensibly for the commercial breeding of pangolins to feed the traditional Chinese medicine (TCM) trade, which she operated with the assistance of close associate and Ugandan wildlife trafficker Smith Ewa Maku.

Our three-year investigation into their activities suggests that Ma's move to Uganda enabled her to deal in pangolins by exploiting laws permitting legal wildlife trade. Crucial to her endeavour was the backing she obtained from high-ranking individuals in the TCM industry,



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as well as both the Chinese and Ugandan governments.

Although presenting herself as a pangolin conservationist and using her political connections to legally establish a facility, which she claimed would be for breeding

pangolins, she appears to have been working with Maku to export pangolin scales of legally questionable origin to China. ●

Opposite page: Ma Jinru, inset, who set up shop as a pangolin trader in Uganda

## Suspected wildlife trafficker arrested

Malaysian national Teo Boon Ching, a suspected key player in the illegal wildlife trade between Africa and Asia, was arrested in Thailand in June.

His arrest in Bangkok is his second for wildlife trafficking offences in Thailand; the first was in March 2015 in relation to the seizure of 135kg of elephant ivory.

Based on EIA investigations, Teo has been involved in the business for more than two decades, providing concealment and packing services to a number of criminal networks involved in the smuggling of elephant ivory, rhino horns and pangolin scales into Asia via Malaysian ports.

Our 2018 report *Exposing the Hydra* documented his role as a specialist transporter assisting Vietnamese and Chinese syndicates in trafficking wildlife between Africa and Asia.

Executive Director Mary Rice said: "Given Teo Boon Ching's lengthy operations in illegal wildlife trade and previous enforcement failures, this is a great opportunity to bring him and his associates to justice." ●



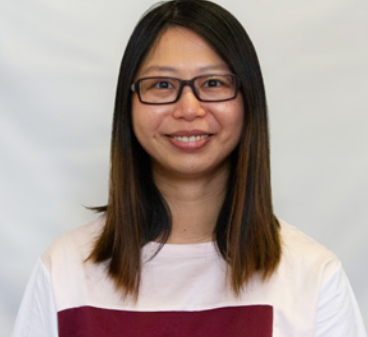
Above: Teo Boon Ching, caught on EIA undercover footage

### A LANDMARK IVORY BUST

June saw the 20th anniversary of the infamous Singapore seizure, a landmark ivory bust which changed the way wildlife crime is tackled to this day.

In a special blog for our website, Campaigns Director Julian Newman took a look back at the case, the challenges of following the paper trail to the parties involved and the lessons learnt by enforcement agencies.





## MEET THE TEAM

**Name:** Ceres Kam

**Age:** 37

**Role:** Wildlife Campaigner

### Hometown

Canton, China, but moved to Hong Kong as a kid and then to Sweden as a teenager.

### Education

MD, MSc in Behaviour.

### Campaign specialism

Wildlife – working closely with the Intelligence and Investigations Team to track ivory trafficking, Chinese policy research and the impact of traditional Chinese medicine in Africa.

### What first interested you in environmental issues?

I have always been fascinated by animals since I was little. As I grew up, the rapid decline of birds and insects, both in China and later in Sweden, concerned me. It is difficult to pinpoint any event as a trigger, but my interest in conservation grew as I read about the various amazing wild animals in the world, the books by Gerald Durrell, Sir David

Attenborough and more.

### What is your most memorable experience at EIA?

Two weeks into my full time employment at EIA, I took off to Malawi for a work trip (I had been working as a consultant part-time for a few months by then). It was my first time ever to Africa, I was to travel alone and all the security procedures that come with an EIA work trip made it even more tense and exciting simultaneously. The work went really well and I found time at the end of the trip to visit Liwonde National Park. Staying in a lodge inside the park, I saw elephants, buffalos, hippos and many species more for the first time. Seeing a family of elephants turn up next to the canteen area after sundown was one thing, but trying to fall asleep in a tree house when an adult elephant was shaking branches in a feast about 50m away was quite another! ●

Below: Young elephant in the wild, as photographed by Ceres



**“If it wasn’t for EIA  
the world would be  
a darker place”.**

Mary, EIA supporter.

**Support our campaigns against wildlife trade  
and for the protection of biodiversity**

For a future where humanity respects, protects and  
celebrates the natural world for the benefit of all.

**Let your passion live on. Remember EIA in your Will.**

Visit [eia-international.org/giftinyourwill](http://eia-international.org/giftinyourwill)