



# IN COLD BLOOD

Combating organised  
wildlife crime



## ACKNOWLEDGEMENTS

EIA would like to acknowledge the support of the Rufford Foundation, Ernest Kleinwort Charitable Trust and Anthony Rae Foundation, enabling EIA to undertake sustained independent monitoring, documentation and analysis of wildlife crime.

EIA also wishes to thank government and civil society contacts who have provided insights and information to complete this report.

Report design by:  
[www.designsolutions.me.uk](http://www.designsolutions.me.uk)

February 2014



### ENVIRONMENTAL INVESTIGATION AGENCY (EIA)

62/63 Upper Street, London N1 0NY, UK  
Tel: +44 (0) 20 7354 7960  
Fax: +44 (0) 20 7354 7961  
email: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)

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

### EIA US

P.O.Box 53343  
Washington DC 20009 USA  
Tel: +1 202 483 6621  
Fax: +202 986 8626  
email: [usinfo@eia-international.org](mailto:usinfo@eia-international.org)

### Cover images:

Vintage Paper © Pola36 | [Dreamstime.com](http://Dreamstime.com)  
US Dollars © Indiansummer | [Dreamstime.com](http://Dreamstime.com)  
Rhino © Johannes Gerhardus Swanepoel | [Dreamstime.com](http://Dreamstime.com)  
Elephant © EIA  
Tigers © Elliott Neep | [www.elliottneep.com](http://www.elliottneep.com)  
Snare Wire © Care for the Wild International



# CONTENTS

3	INTRODUCTION
4	THE NATURE OF WILDLIFE CRIME
7	WILDLIFE CRIME CASE FILES
17	CATCHING UP WITH MAJOR WILDLIFE CRIMINALS
19	WHAT NEEDS TO BE DONE?
20	RECOMMENDATIONS

## WILDLIFE IN JEOPARDY

### TIGERS:

Fewer than 3,500 wild tigers remain across 13 tiger range countries in Asia. They face many threats, including poaching for skins, bone and other parts. Skins are used for luxury home décor and gifts, and bones for medicine and tonics. The main market is China, followed by Vietnam for bone, Indonesia for skins and Thailand for meat. Other Asian big cats are also threatened by the demand for skins and other body parts. In the past 13 years, 5,740 Asian big cats have been identified in trade; in trans-Himalayan countries specifically, 1,298 tigers have been identified in trade since 1994.<sup>1</sup>

### ELEPHANTS:



Distributed in Africa and Asia, elephants are threatened by poaching for tusks for ivory carvings, with main markets in Asia. International ivory trade was banned in 1989 but two international legal sales from African to Asian countries have subsequently taken place. There has recently been a huge increase in poaching, with an estimated 50,000 African elephants killed annually.<sup>2</sup> Large volumes of ivory continue to be trafficked, with at least 45 tonnes seized in 2013.<sup>3</sup>

### RHINOS:



Distributed in Africa and Asia, the most populous subspecies is the white rhino whose population of 20,170 mainly spans South Africa, Namibia, Zimbabwe and Kenya.<sup>4</sup> Rhinos are threatened by poaching for horn, used in traditional Asian medicines and for decorative carvings. New uses for rhino horn have emerged, such as ground horn in drinks for social occasions. Poaching for horn has increased dramatically in recent years: South Africa has experienced a poaching increase of more than 7,000 per cent since 2007.<sup>5</sup> Emerging crime trends to procure rhino horn include exploitation of hunting loopholes and burglaries targeting rhino horn in museums.

# INTRODUCTION



© Mary Rice/EIA

## ABOVE:

Wildlife populations are devastated by criminal activities which fuel conflict, undermine governance and economic stability and exploit communities.

The Environmental Investigation Agency (EIA) has been documenting and analysing environmental crimes and abuses that impact our natural world for three decades. The objective has been to motivate governments to implement and enforce policies, laws and practices to protect species and habitats threatened by trade and unsustainable exploitation.

EIA's modus operandi includes undercover investigations into the criminals perpetrating these crimes. In the 1980s, EIA documented the role of the Poon family, a sophisticated and organised transnational criminal network engaged in trafficking ivory from Africa, via the Middle East to east Asia. Over a decade later, EIA's analysis of individuals and companies implicated in the seizure of more than seven tonnes of ivory in Singapore in 2002 revealed that members of the Poon network were still involved in the illegal ivory trade. To this day, none of the key players involved in the 2002 seizure have been prosecuted.

A lack of effective enforcement to disrupt the international syndicates involved in wildlife crime is a common and persistent problem. This is often due to a lack of investment and commitment from the highest levels of government to deliver a proactive, multi-agency, targeted and effective response.

The current unprecedented level of political attention given to wildlife crime

represents a crucial opportunity to turn previous commitments to combat organised wildlife crime into action. The international community must now ensure that the rule of law is fully applied to wildlife crime, and that enforcement techniques honed in other areas of serious crime are used to dismantle wildlife trafficking syndicates.

This report features case studies that illustrate the successes and shortcomings in efforts to disrupt criminal networks, prosecute criminal masterminds and confiscate the proceeds of wildlife crime.

The role of serious and organised criminal networks in wildlife crime is not an overnight phenomenon, but in the face of chronic government failure to treat it seriously, networks have persisted and prospered.

Yet there are also examples where enforcement has been effective. Many frontline officers take great risks to curb wildlife poaching and smuggling. Specialised agencies and international organisations are yielding results. This dedication must be backed by political commitment to turn the tide against the current escalation of wildlife crime. Now is the time for enforcement, not extinction.

Environmental Investigation Agency  
February 2014

# THE NATURE OF WILDLIFE CRIME

Wildlife crime involves the poaching, illegal possession or trade of protected fauna and flora. International illegal wildlife trade occurs in contravention of the United Nations Convention on International Trade in Endangered Species (CITES). Although historically treated as a low priority by governments, wildlife crime has wide-ranging impacts, threatening the survival of species in the wild along with ecosystems and habitats upon which millions of people also depend. It is facilitated by arms proliferation, with rangers among human casualties on the front line against well-equipped and well-funded poachers. Wildlife crime fuels conflict and undermines governance, socio-economic stability, territorial integrity and national security.<sup>6</sup>

As with other major crimes, wildlife criminals use intimidation and corruption. Corruption is inherent in wildlife crime – whether through bribes, pay-offs, officials turning a blind eye, or distortion of the judicial process following arrests. Criminals involved in wildlife trade can also be involved in the trafficking of other contraband and make use of the same logistics and trafficking routes. Proceeds generated through wildlife crime may fuel other organised criminal activities and conflict.

Wildlife crime exhibits numerous indicators of organised crime, such as individuals cooperating in networks, motivated by high profits and aided by corruption. Although wildlife killings can be opportunistic or driven by subsistence, the organised crime aspect is common and persistent. The 1980s saw the mass slaughter of elephants across Africa, including by military groups using automatic weapons, to procure ivory which was trafficked by organised criminals through the Middle East to Asia. In the 1990s, demand for tiger bone surged and impacted heavily on tiger populations as criminal networks supplied the international market.

Both the international community and individual countries have responded to previous threats by taking laudable steps such as the ban on international commercial trade in rhino horn in 1977 and ivory in 1989, adopted under CITES, and a ban on the use of rhino horn and tiger bone for traditional medicinal purposes in China in 1993.

Yet these measures have been undermined by contrary policies and decisions which stimulate demand and present the opportunity for exploitation and laundering. Two CITES-sanctioned international ivory sales have made a mockery of the 1989 ban on ivory trade, while China's domestic ban on tiger bone does not extend to tiger skins.

## Lessons learned?

Despite previous poaching crises, governments have failed to take sufficient measures to respond effectively to wildlife crime. Enforcement tactics have not kept pace with sophisticated networks and under-investment in resources has resulted in a lack of consistent implementation of effective disruption or prevention tactics.

The responsibility for fighting wildlife crime often rests with under-resourced wildlife and forest departments, and

## SERIOUS ORGANISED WILDLIFE CRIME

Expert analysis of wildlife crime has identified a host of factors indicative of the serious and organised nature of the offences, especially in relation to Asian big cats, rhinos and elephants.<sup>7</sup> Recognised indicators of organised wildlife crime include:

- Organised structure to poaching: use of gangs, supply of vehicles, weapons and ammunition and exploitation of local communities;
- Provision of high-quality lawyers and corruption of judicial process;
- Violence towards law enforcement personnel;
- Financial investment in 'start-up' and technology needed for processing and marketing;
- Sophistication of smuggling techniques and routes;
- Involvement of persons of high political or social status;
- Sophisticated forgery and counterfeiting of documents;
- Use of fake or 'front' companies;
- Use of the internet to commission crime;
- Previous convictions for other types of crime;
- Huge profits.<sup>8</sup>

police and customs agencies often fail to prioritise wildlife crime. Multi-agency units, long recommended as a means to effectively tackle the issue, are not widely established and, where they do exist, are constrained by resources and lack authority. When enforcement does occur it tends to over-emphasize seizures of contraband wildlife, usually exhibited soon after to the media, rather than conduct serious investigations into the networks involved.

While the focus is placed on the size or frequency of seizures of wildlife, organised criminal networks demonstrate adaptability to evade enforcement.<sup>9</sup>

Nor is burgeoning trafficking matched by prosecutions and convictions, particularly of major criminals. In some countries where convictions do occur, weak penalties provide inadequate deterrence.<sup>10</sup> The current head of the UN Office on Drugs and Crime (UNODC), Yuri Fedotov, has stated the importance of making wildlife crimes punishable by imprisonment of four years or more in national legislation, which would ensure the UN Convention against Transnational Organised Crime (UNTOC) can be used to combat wildlife crime.

To date, the tracking of illicit financial flows and divesting wildlife criminals of the proceeds of crime are not widespread practices, yet the foundation exists to make them so: the UN Convention on Corruption seeks to identify the links between corruption, organised crime, money laundering and economic crime; the Financial Action Task Force (FATF) specifically addresses money laundering and its

recommendations are suitable for adaptation to combat the laundering of proceeds derived from wildlife offences.<sup>11</sup>

Intergovernmental organisations and bodies such as INTERPOL and World Customs Organisation (WCO) increasingly play an important coordinating role in combating transnational wildlife crime, yet their effectiveness is equally dependent upon the cooperation and participation of national governments, as well as their own internal resources and priorities.

Governments must act now to avoid the mistakes of the past which have allowed criminals to exploit contradictory laws and profit from the lack of sustained implementation of effective responses. Practices which tackle wildlife crime as serious organised crime need to be rigorously applied and institutionalised, or wildlife crime will remain a high profit and low risk activity.

## Growing recognition of the wildlife crime threat

The international community has repeatedly expressed the need for more effective action to combat wildlife crime, through the UN General Assembly (UN GA), UN Economic and Social Council (ECOSOC) and UN Commission on Crime Prevention and Criminal Justice (CCPCJ). Specific resolutions include:

- UNGA Resolution 55/25 adopting the Convention on Transnational Organised Crime (UNTOC) in 2000 recognises that the Convention provides a legal framework to combat illicit wildlife trafficking;<sup>12</sup>
- ECOSOC resolutions 2001/12, 2003/27, 2008/25 and 2011/36 on illicit trafficking in protected species of wild fauna and flora;<sup>13</sup>
- CCPCJ Resolution 16/1 of 2007 on “International cooperation in preventing and combating illicit international trafficking of resources including wildlife”;<sup>14</sup>
- Rio+20’s Outcome Document paragraph 203, adopted by the UNGA on July 27, 2012 (UNGA/66/288), which “recognises the economic, social and environmental impacts of illicit trafficking in wildlife, where firm and strengthened action needs to be taken”.<sup>15a</sup>

**“ UNODC calculated in 2011 that the total value of the illegal global wildlife trade was between \$8bn to \$10bn annually (excluding timber and marine wildlife)”**

**Yury Fedotov, Executive Director of the UN Office on Drugs and Crime and John E Scanlon, Secretary-General of CITES<sup>15b</sup>**



© Dave Currey/EIA

Additionally, international agreements directly or indirectly attempting to tackle wildlife crime include CITES, UNTOC and UN Convention against Corruption. CITES and the international police organisation INTERPOL developed a memorandum of understanding in 1998.<sup>16</sup> INTERPOL has a dedicated Environmental Security Sub-Directorate and operates several species-specific projects through which it plays a coordinating role for international operations and provides a mechanism for countries to share information through its National Central Bureaus and I24/7 network. More recently, INTERPOL has been promoting the creation of multi-agency units called National Environmental Security Task Forces (NESTs).<sup>17</sup>

At the International Tiger Forum in St Petersburg in 2010, five international organisations (CITES Secretariat, INTERPOL, WCO, UNODC and the World Bank) united under the banner of the International Consortium on Combating Wildlife Crime (ICWC)<sup>18</sup> and in 2012 launched the “Wildlife and Forest Crime Analytical Toolkit”.<sup>19</sup> The Toolkit enables countries to identify gaps and obstacles to combating wildlife crime across areas such as legislation, enforcement, judiciary and prosecution. The outcome of this assessment can be used by countries to develop strategies, to close identified gaps, and to request technical assistance.

Since 2013, wildlife crime has risen up the international political agenda through a spate of high-level events, announcements and expressions of concern from world leaders, including:

- ECOSOC Resolution 2013/40 gave specific recognition to trafficking in protected species of wild fauna and flora involving organised criminal groups as a serious crime;<sup>20</sup>
- African Development Bank – Marrakech Declaration, May 2013: A 10-point action plan to combat illicit wildlife trafficking;<sup>21</sup>
- HRH The Prince of Wales and HRH The Duke of Cambridge hosted an international conference in collaboration with the UK Government on illegal wildlife trade in May 2013;<sup>22</sup>
- US President Obama’s Executive Order on Combating Wildlife Trafficking in July 2013;<sup>23</sup>

- Public destruction of ivory stockpiles in the Philippines, the US, China and France;<sup>24</sup>
- UN General Assembly high level meeting on “Poaching and illicit wildlife trafficking – a multidimensional crime and a growing challenge to the international community”, held in September 2013.<sup>25</sup>

While there are encouraging moves in the right direction, the challenge remains to translate this high-level attention and momentum into meaningful action. This entails national leaders bringing together ministers and senior managers responsible for police, customs and other law enforcement agencies with colleagues in forest, national park and environment agencies to ensure that skilled personnel are assigned to tackling wildlife crime.

## Indicators of real commitment

Commitments must be made to proactive and effective enforcement, by dedicating resources so that multi-agency enforcement units have the money, people, training, equipment and authority required to fulfil their mandate. For example, India’s Wildlife Crime Control Bureau (WCCB) became operational in 2008 as a national multi-agency unit and has since been involved in the investigation of cases involving Asian big cat trade networks, such as the Harsh Tamang case in 2009 and “Sarju network” arrests in 2013. In 2011, China established a National Inter-Agency CITES Enforcement Collaboration Group (NICECG), a coordinating body to facilitate the collection and exchange of intelligence, enhance capacity building and coordinate joint enforcement activities. Yet such positive moves are sometimes hindered by a lack of human and operational resources, and can lack representation of key agencies and the requisite authority. Also, such multi-agency units need to span the criminal justice system by including prosecutors and justices.

Other indicators that a government is committed to more proactive and effective law enforcement tactics include creating a centralised wildlife crime database to collate, analyse and disseminate criminal information to aid profiling and targeted action; appropriate and lawful use of specialist investigation techniques such as covert techniques and controlled deliveries; evidence-gathering for robust prosecution; and financial investigations, seizure of assets and the application of proceeds of crime legislation.



© iStock.com/EdStock

**ABOVE:** President Obama’s 2013 Executive Order on Combating Wildlife Trafficking recognises the “international crisis” of wildlife trafficking. Actions include encouraging the development and enforcement of laws, providing assistance to countries experiencing wildlife trafficking, combating transnational organised crime, and reducing demand.

## WILDLIFE CRIME CASE FILES:



SINGAPORE SEIZURE GOES UP IN FLAMES: Ivory destructions symbolise commitment to tackling the trade, but robust prosecutions of major suspects will indicate meaningful action.

© Mary Rice/EIA

# IVORY

## SINGAPORE IVORY SEIZURE, 2002

### LOCATIONS:

Zambia, Malawi, Mozambique, Singapore, Japan

### ORGANISED CRIME INDICATORS:

- sophisticated smuggling techniques, methods of circumvention and routes;
- use of front companies;
- corruption;
- multiple shipments.

In June 2002, the vessel *MOL Independence* docked in Singapore. Prompted by a tip-off, the Singaporean authorities inspected a container off-loaded from the vessel, declared by the bill of lading to be carrying stone sculptures from Lilongwe, Malawi.

Inside the container was the largest ivory consignment seized since the 1989 international ban on trade in ivory, totalling 7.2 tonnes of ivory, including over six tonnes of tusks.

Subsequent research by EIA indicated that the seized container was just one of 19 suspected shipments by a sophisticated and organised ivory syndicate that had been operating with impunity since at least 1994. The size of the consignment was a clear indication of the syndicate's confidence in evading detection.

Subsequent DNA analysis revealed the seized ivory had been sourced largely from elephants in Zambia. After poaching, the ivory had been transported to Malawi for packing and then taken by road to the port of Beira, in Mozambique, from where it was shipped to South Africa and on to Singapore, with Japan the intended final destination.

The syndicate had used a range of activities to evade detection, including pseudonyms, fake companies and misdeclaration of cargo. Its activities were on a truly international scale, involving individuals in Zambia, Malawi, Mozambique, China, Singapore and Japan.

Initial investigations were characterised by unprecedented levels of interagency cooperation across regions and countries. As a result, a distinct syndicate was revealed, key players identified and substantial evidence recovered.

Yet these encouraging moves soon stalled. The momentum driving communication and cooperation decreased, coupled with obstruction and uncertainty regarding judicial requirements. The prosecution in Malawi was delayed due to a misguided belief that the seized ivory was physically required in court. The accused were discharged.

The ivory was subsequently transported to Kenya in March 2004, under the custodianship of the Lusaka Agreement Task Force (LATF). Although the prosecution recommenced, the case had been re-assigned to a new prosecutor, again resulting in delay. The shipping agent in Singapore who prepared the documents which facilitated the shipment was fined only 5,000 Singapore dollars (US\$3,000), at that time the maximum fine under the Endangered Species (Import and Export) Act.<sup>26</sup>

This small fine was the only penalty levied on any member of the syndicate, despite a wealth of incriminating evidence. Basic background checks made by EIA revealed that the consignees in Singapore had historical links to the ivory trade dating back to the 1980s. Yet such checks were not conducted by the Singapore authorities and no follow-up action taken. Ultimately, excellent work by officers from the Zambia Wildlife Authority (ZAWA), LATF and Malawi's Anti-Corruption Bureau was squandered and an opportunity to dismantle a major ivory smuggling network missed.

The Poon network was exposed in the 1980s and the Singapore seizure in 2002 revealed its ongoing involvement in the illegal ivory trade. None of the key players have been prosecuted yet.



© EIA



## IVORY TRAFFICKING AND THE TENG GROUP, 2006

### LOCATIONS:

Cameroon, Nigeria, Hong Kong, Taiwan

### ORGANISED CRIME INDICATORS:

- sophisticated smuggling techniques and methods of concealment;
- use of front companies;
- attempted corruption of judicial process;
- multiple shipments;
- huge profits;
- repeat offenders.

In 2006, a shipping container of used tyres arrived in Douala, Cameroon, from Hong Kong. It travelled inland to an address in the Cameroon capital of Yaoundé, where it was emptied, loaded with timber and despatched again for Asia.

In May, Customs officers at Hong Kong's Kwai Chung terminal used X-ray to examine the container and found concealed behind the timber in a specially modified compartment, 3.9 tonnes of elephant tusks – a record seizure for Hong Kong at that time, and representing at least 400 dead elephants.

Follow-up investigations found the container was intended for

re-export to Macau.<sup>27</sup> Hong Kong alerted the Cameroonian authorities and an inter-agency investigation was initiated in Cameroon. The Yaoundé address was traced and two further modified containers were discovered, registered to the same shipper. The hidden compartments had been skilfully constructed and their presence suggested the traders had advance knowledge of the space and shipping budget for specific amounts of ivory.<sup>28</sup> These containers were empty; however, ivory chippings were found inside and paperwork indicated the transport of at least 12 previous shipments along the same route.<sup>29</sup> INTERPOL issued a notice in July 2006 to alert law enforcement of the method used to smuggle the ivory.<sup>30</sup>

The shipments were linked to the 'Teng Group' – a notorious syndicate connected to money laundering and drug trafficking with previous connections to Nigeria.<sup>31</sup> In 1998, Customs officers in the port of Keelung, Taiwan, seized 1.4 tonnes of ivory tusks hidden amongst a container of timber shipped from Nigeria. The consignee was a member of the Teng Group.

The group, comprising Taiwanese and Filipino nationals, had been operating an import/export company from Yaoundé for several years.<sup>31</sup> The syndicate has been cited as making around US\$4 million every two months.<sup>32</sup> In a house search, ivory carvings were recovered, along with 35 telephone SIM cards indicating the lengths to which the suspects had gone to avoid detection.<sup>33</sup> The scale of operations was extensive – subsequent DNA analysis of the ivory seized found it had originated from forest elephants, centred in south-east Gabon near the Congo-Brazzaville border.<sup>34</sup>

Three arrests of the Teng Group members were made in Cameroon, and attempted bribery to release an arrested suspect occurred.<sup>35</sup> The suspects were charged with violations of Customs and wildlife laws and a prosecution was launched. Yet by the time the case came to court, the accused had fled and remain at large.<sup>36</sup> Despite impressive inter-agency and international cooperation in both seizure and investigations, a criminal syndicate behind a series of illicit ivory shipments has so far evaded the law.



© EIA



© Mari Park/EIA

Without investigations, evidence-gathering to secure prosecutions, and application of a range of legislation, criminals will continue undeterred and write off seizures of contraband as a business expense – while more poaching fills the shortfall.

## WILDLIFE CRIME CASE FILES:



© EIA/WPSI

# ASIAN BIG CATS

## SANSAR CHAND AND THE SARJU NETWORK

### LOCATIONS:

India, Nepal, China

### ORGANISED CRIME INDICATORS:

- organised structure to poaching;
- multiple shipments;
- inviolability of perpetrators;
- provision of high-quality lawyers;
- repeat offenders.

In India, Sansar Chand ranks as one of the most notorious tiger traders in history. Involved in the wildlife trade virtually all his life, he was first arrested in 1974 in a case involving tiger and leopard skins.<sup>37</sup>

When Chand was convicted for only the second time in 2004, he disappeared after he was released on bail.<sup>38</sup>

In February 2005, news emerged that all tigers in Sariska Tiger Reserve had been poached. India's Central Bureau of Investigation (CBI) was called in to investigate, while the Delhi City Crime Branch conducted telephone intercepts which led to Chand. He was arrested in June 2005.<sup>39</sup> At that time it was estimated his network controlled 50 per cent of the black market in tiger and leopard skins, and he and his associates had at least 57 court cases pending against them across nine states in India, dating back as far as 1974.<sup>40</sup>

Chand sold hundreds of tiger and leopard skins to international dealers, supplying a transnational trade decimating India's Asian big cats.<sup>41</sup> He was charged under the stringent Maharashtra Control of Organised Crime (MCOCA), a landmark charge against a wildlife criminal.<sup>42</sup> Members of Chand's family have continued trading: his wife, previously convicted, has received bail on appeal, and his brother Narayan remains in prison.<sup>43</sup>

While Chand is arguably the most notorious trader he did not act alone, and was part of a transnational network with links across the Himalayan region which was never fully dismantled.

Since 2005, investigations by EIA and the Wildlife Protection Society of India (WPSI) have documented the sale of 461 Asian big cat skins in China and Tibet Autonomous Region (hereafter referred to as Tibet).<sup>44</sup> Seizures in early 2013 indicate that the trans-Himalayan skin trade continues, with agencies in Nepal intercepting seven tiger skins and 167 kg of bone heading to China.<sup>45</sup> Reports suggest at least one of the tiger skins seized matched a tiger from Pench reserve in India.<sup>46</sup> Records<sup>47a, 47b</sup> for 2013 suggest between 68-80 tigers died in India alone. Initial estimates suggest that at least 42 of these tigers were killed for trade,<sup>47b</sup> though this figure may rise as postmortem investigations are concluded. At least 110 leopards were also killed for trade.<sup>47b</sup>

During 2013, tiger poaching in the Pench Corridor made headlines in India and led to a series of arrests across several states. The structure was familiar: itinerant, organised poachers supplying city-based traders with rumoured international connections. The activities of a procurer named Sarju Bagdi came to light, described by Delhi Police as a former poacher for Sansar Chand. In September 2013, Sarju was arrested with cash and tiger bones; police interrogations revealed he had been sourcing tiger skin and derivatives for Delhi-based Suraj Pal.<sup>48</sup>

Long active in the trade, Suraj Pal's status as a major tiger skin trader was described several years ago by Sansar Chand himself yet he was arrested for the first time only in September 2013.<sup>49</sup> A journalist reported that Chand, Sarju and Suraj Pal all share the same lawyers.<sup>50</sup> In this ongoing case, a wide range of agencies with both state and national reach have been involved in the search and apprehension of suspects - agencies which are subject to a range of different jurisdictions and mandates whose activities require careful coordination and cooperation to gather evidence aimed towards the most robust prosecutions.

Specialised investigation techniques have enabled agencies to gather information and India now has an opportunity to effectively disrupt a significant and wide-ranging network. The historical links to the Chand network remind us how persistent these repeat offenders are, how important it is to fully investigate criminal associations, to establish national centralised databases on criminal information and plan a coordinated interagency approach. With tentacles stretching across borders, action is required in Nepal and China in order to disrupt the networks along the entire chain.



© Belinda Wright/WPS/EIA



© EIA



© EIA

Enforcement tactics have not kept pace with the changing dynamics of the Asian big cat trade. The trans-Himalayan trade continues in a more covert manner – correspondingly sophisticated tactics are needed to detect and disrupt it.

## SANGSANG SEIZURE, 2003

### LOCATIONS:

India / Nepal, Tibet

### ORGANISED CRIME INDICATORS:

- use of 'mules' or couriers;
- forgery or counterfeiting of documents;
- multiple commodities of fauna;
- sophisticated methods of circumvention and routes.

In December 1999, a consignment of three tiger skins, 50 leopard skins and five otter skins was intercepted in Ghaziabad, India. A few weeks later, leads from the case resulted in a massive seizure in Khaga, India, revealing operations and trade connections between India, Nepal and Tibet.

The scale of the illicit trade was confirmed in 2003 when police in Sangsang, Ngamring County, Tibet conducted a routine vehicle search and discovered a huge amount of skins from Asian big cats and other species: 31 tiger skins, 581 leopard skins and 778 otter skins. Some of the tightly packed skins had bullet holes and some had Delhi newspapers stuck to the back of them.

The three occupants of the vehicle were arrested and, while claiming not to know each other, were in possession of serialised cash totalling an equivalent of US\$5,300, believed to be part of a bigger sum. The vehicle licence and registration were fakes.

The case was handed to the Anti-Smuggling Bureau of Lhasa Customs for investigation. A number of different authorities and departments collaborated and cooperated, including the

Ngamring County Public Security Bureau (PSB), Ali Customs, Rutog County Public Security Bureau and other local authorities. Inquiries found that the three suspects had previously travelled from Lhasa to western Tibet in June 2003 and had spent considerable time in a guest house in Shiquanhe Town, in Ali County, making telephone calls abroad.

In September, the suspects had travelled to the Indo-Tibetan border area, most likely to collect illegal goods; however, they were arrested for attempting to cross the border illegally and subsequently released. They returned at night on October 4 and collected the consignment. Witnesses reported seeing up to 25 horses pulling packs, accompanied by three to four people, delivering the items in bales.<sup>51</sup> In October 2004, the three suspects were found guilty, convicted and sentenced to death, subsequently commuted to life imprisonment.<sup>52</sup> The conviction of the couriers did not result in identification of the leaders of the smuggling syndicate. After the seizure, the smugglers reduced the risk of detection by moving skins in smaller quantities and in pieces, and quartering skeletons to carry in batches.<sup>53</sup>

Within Tibet the case was characterised by good cooperation between police and Customs authorities, and also between local offices and regional headquarters. Yet intelligence-sharing needed to unmask the key players behind the smuggling attempt proved to be problematic. Information surrounding the international phone calls by the couriers in Shiquanhe was not shared with the Indian and Nepalese authorities at the time, and financial investigations could have revealed further leads and built a case for seizure of assets of the syndicate bosses.

### THE TRANS-HIMALAYAN SKIN TRADE CONTINUES:

The huge Sangsang seizure resulted in convictions of couriers but syndicate bosses remained untouched.



© Anti-Smuggling Bureau Customs Administration of China





Integrating information from a range of historical and contemporary sources highlights key features of the ongoing Asian big cat trade.

## WILDLIFE CRIME CASE FILES:

© Czech Environmental Inspectorate

Ten rhino horns seized at Prague Airport.

# RHINO HORN

## EXPLOITATION OF LOOPHOLES AND TRANSNATIONAL TRAFFICKING

### LOCATIONS:

South Africa, European Union, Vietnam

### ORGANISED CRIME INDICATORS:

- organised structure to poaching;
- financial investment in start up;
- sophisticated methods of circumvention and routes;
- use of 'mules' or couriers;
- huge profits;
- multiple shipments.

Illicit trade in rhino horn has surged in recent years, driven by growing demand in Asia for uses ranging from traditional Asian medicine to ground rhino horn in a fashionable social drink.

Rhino horn is sourced and smuggled to Asian markets in several ways. In Europe, serial burglaries of museums have targeted rhino horns and are linked to organised crime groups. Rhino horns have also been procured from private collectors and auction houses for Asian markets. Subversion of legal rhino hunting has also emerged.

South Africa has the largest population of southern white rhino, present in both national parks and private game reserves. It is also the epicentre of the current poaching crisis – an increase of over 7,000 per cent since 2007.<sup>54</sup> These populations are listed on Appendix II of CITES, with an annotation limiting trade to hunting trophies and live rhino to appropriate and acceptable destinations.

These annotations present a loophole which has been ruthlessly exploited by resourceful criminals who obtain rhino horn through 'pseudo hunts' in South Africa. The scale of this abuse and the sophisticated syndicates behind it is shown by the escalating involvement of hunters from countries such as Vietnam, a major market for rhino horn, and Thailand. The most notorious case involves Thai national Chumlong Lemtongthai, a member of the Xaysavang syndicate.

In February 2012, South Africa's National Department of Environmental Affairs (DEA) issued instructions to stop granting hunting permits to Vietnamese citizens until it could be verified that they would not be misused to supply the illegal rhino horn trade.

The ability of organised crime to exploit loopholes and adapt to enforcement challenges was then demonstrated by the emergence of a new trend: groups from a different community – Czech nationals – with no previous hunting experience and no gun licences, undertaking paid hunting holidays to South Africa to procure rhino horn.<sup>55</sup> The horns were then exported to the hunters in the EU – however, the 'hunters' are simply middlemen and the horns are then laundered onto the black market.<sup>56</sup>

In July 2013, the Czech authorities conducted searches and arrested 15 people connected to sham rhino hunts in South Africa. At least, 24 rhino horns have been seized in the Czech Republic in the past few years.<sup>57</sup> The Czech Environmental Inspectorate has identified a growing number of people involved in this criminal activity; with recruitment of the 'hunters' now extending to other EU states.

The Czech case highlights continuing problems with international intelligence-sharing. Efforts by the Czech authorities to exchange information with South African counterparts, including using INTERPOL channels, were largely fruitless.<sup>58</sup>

In the absence of harmonised systems in South Africa able to collate and compare permit details and identify anomalies, and a lack of efficient and timely information-sharing by countries within existing mechanisms, sophisticated, transnational criminals such as these are likely to continue to abuse South Africa's loopholes.

## THE CASE FOR PROSECUTION

All too often, exemplary work carried out by dedicated enforcement agencies has failed to lead to detailed follow-up investigations into other members of the smuggling networks and prosecutions resulting in deterrent sentences.

The apparent obsession with seizures alone does not constitute an adequate deterrent. Without prosecutions, seizures of contraband merely constitute a business expense. For example, although the Hong Kong authorities seized almost 14 tonnes of ivory between 2011-13, no prosecutions have occurred in the territory.<sup>59</sup>

Many of the individuals highlighted are serial offenders, their operations and networks largely unscathed by enforcement activities.

Yet there are also examples where good enforcement practice has been applied to wildlife crime cases, spanning the initial seizure to a successful prosecution, and effective utilisation of tools such as timely sharing of intelligence and use of controlled deliveries to track the main culprits.

Examples include:

## Fujian Province, China: ivory smuggling via Malaysia

### INDICATORS OF PROACTIVE ENFORCEMENT:

- specialised investigation techniques, controlled delivery;
- timely international sharing of intelligence;
- identification and disruption of networks;
- media announcements after investigations completed.

In November 2012, authorities in Quanzhou, in Fujian Province of China, acted on intelligence to conduct a series of coordinated enforcement actions against a gang suspected of the transportation and storage of illegal ivory. Vehicle stops and a series of arrests across Fujian led to a raid of the warehouse rented by the gang where a total of 4.2 tonnes of ivory was discovered. The investigation found that from April 2012, the buyer Liu and his partner Zhang had invested more than US\$3 million to import African ivory into China hidden in consignments of wooden planks. Upon importation, the warehouse was a holding point from which the ivory could be sold in batches.<sup>60</sup>



China's ivory market stimulates demand and provides a laundering mechanism for illegal ivory to enter the market

© EIA

## WILDLIFE CRIME CASE FILES:



© Bruce McCoubrey/EIA



© EIA

Following the discovery, investigations by Xiamen Customs found two containers had yet to arrive and were en route via Malaysia.<sup>61</sup> They shared this intelligence with China Customs headquarters, which forwarded it to Royal Malaysian Customs.

Acting on the tip, Customs officers in Port Klang, Malaysia, inspected a consignment of timber from West Africa and found six tonnes of ivory concealed inside wooden slabs, synonymous with the smuggling method used by Liu's gang.<sup>62</sup>

This case demonstrates several elements of good enforcement practice. Announcements to the media were made following the investigations and evidence-gathering in Fujian; and information was transferred via existing networks in a timely manner, from Xiamen Customs to China Customs then internationally to Malaysia, to enable the shipment to be intercepted.

This case marked the second ivory trafficking ring to be broken up by the authorities in Fujian. The other syndicate, headed by a man named Chen - an authorised ivory dealer in China - was implicated in five shipments of ivory totalling 7.5 tonnes. Chen received a 15-year prison term in May 2013.

### Sri Lanka ivory seizure

#### INDICATORS OF PROACTIVE ENFORCEMENT:

- international cooperation;
- use of international enforcement agencies;
- timely sharing of intelligence.

Given the international nature of wildlife trade, intergovernmental organisations can play a vital role in coordinating enforcement activities, sharing information in secure and appropriate ways, and disseminating best practice.

The World Customs Organisation is an intergovernmental body with 179 Customs administration members from around the world.<sup>63</sup> This network is supported by the Regional Intelligence Liaison Office (RILO) mechanism comprising regional centres for collecting, analysing and supplementing data in addition to disseminating information on trends, modus operandi, routes and significant cases of fraud.<sup>64</sup>

In 2012, RILO Asia Pacific (RILO AP) received information suggesting that three containers in transit were suspected of containing illegal wildlife items. It was through the Customs network that RILO AP shared intelligence in a timely manner to Sri Lanka Customs at the Port of Colombo, where the containers were due to arrive, enabling interception. On May 22, 2012, Sri Lanka Customs searched the containers and discovered 1.5 tonnes of elephant tusks, a historic ivory seizure for Sri Lanka. The consignment was en route from Mombasa, Kenya, and outbound to Dubai.<sup>65</sup>

In July 2013, follow-up case support was provided by INTERPOL. A team was dispatched to Sri Lanka to take samples of the tusks for DNA testing, which revealed the ivory had come from elephant populations in southern Tanzania. This momentum must continue in order to secure meaningful prosecutions.



## Gir Lion Poaching Case, India

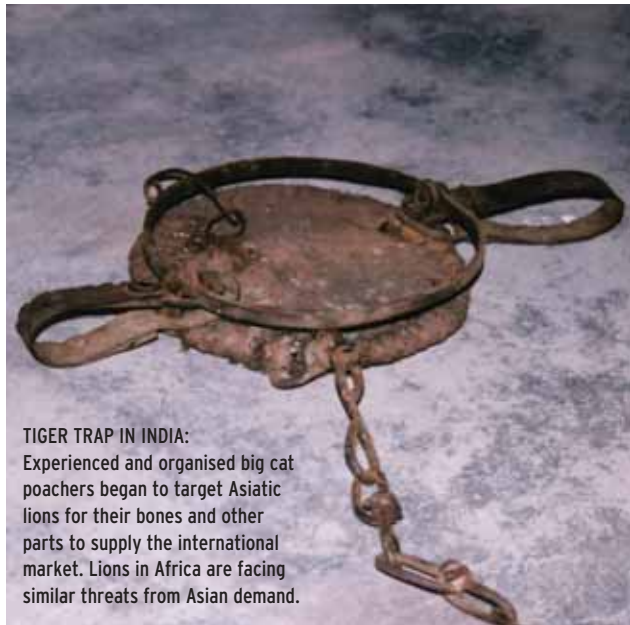
### INDICATORS OF PROACTIVE ENFORCEMENT:

- interagency cooperation;
- application of policing methods to poaching incidents;
- scientific evidence-gathering;
- evidential case-building for robust prosecution;
- identification and disruption of network.

The last remaining population of Asiatic lions is found in Gir National Park, India. In 2007, organised tiger poachers targeted these lions for their bones and other parts to feed the international market as a substitute for tiger bone.<sup>66</sup>

The State CID Crime Department was called in to cooperate in investigations with Forest Department and the Directorate of Forensic Sciences. NGOs provided specialist insights into the methods and typical profiles of poachers.<sup>67</sup> A dedicated team of forensic experts conducted crime scene examination, methodically collecting, preserving and analysing evidence.

Suspects were arrested in possession of lion claws, traps and mobile phones. Upon arrest, suspects' fingernails were clipped for evidence of Asiatic lion blood suspected to have been deposited while dissecting the carcasses. Samples were taken from bloodstained clothing still worn by the poachers. DNA analysis by Gandhinagar Forensics Laboratory confirmed the presence of lion blood. A bandage found at the scene connected the suspects' DNA with the location.<sup>68</sup> This was the first case



**TIGER TRAP IN INDIA:**  
Experienced and organised big cat poachers began to target Asiatic lions for their bones and other parts to supply the international market. Lions in Africa are facing similar threats from Asian demand.

© Nick Mole/EIA

in which such DNA techniques were used to catch criminals in a wildlife crime investigation.

In court, this persuasive evidence helped secure a conviction. In the end, 36 poachers were convicted and a major poacher/trader network was exposed. The Gir lion poaching case is an example of successful enforcement made possible through rigorous investigation and evidence-gathering, with a strong forensic interface at every stage of investigation. This case demonstrates how forensics can be effectively applied to wildlife crime.



© Mike McWilliam/EIA



### TENG GROUP

CAMEROON: Ivory



© Merit Park/EIA

Active in West Africa since the 1980s and linked to money laundering and drugs, the Teng Group was implicated in multiple ivory shipments from Cameroon to Asia, with one 3.9 tonne shipment intercepted in Hong Kong in 2006. Although prosecution was launched against three members of the Group, they fled from Cameroon and have so far escaped the law.

### CHUMLONG LEMTONGTHAI & MARNUS STEYL

SOUTH AFRICA: Rhino horn



© Dave Currey/EIA

In July 2011, Thai national Chumlong Lemtongthai ('Chai') was arrested in South Africa and charged with illegally obtaining hunting permits to fraudulently export rhino horns. He operated as a senior member of a syndicate around the infamous Laos-based Xaysavang Company.<sup>71</sup> At his trial, he pleaded guilty to 52 counts, including illegally obtaining hunting permits, trading in rhino horn, breaching the Customs and Excise Act and tax fraud.<sup>72</sup> In November 2012, he was sentenced to 40 years in prison. Reduced to 30 years on appeal.<sup>73</sup> Charges against five co-accused, including safari-operator Marnus Steyl and two other South African nationals mysteriously dropped due to insufficient evidence.<sup>74a</sup> Following pressure from the media and parliament, Steyl was rearrested and the prosecution against him is on-going.

## CATCHING UP WITH MAJOR WILDLIFE CRIMINALS

### - WHERE ARE THEY NOW?

Above the poachers and couriers, wildlife crime is characterised by known and suspected criminals who are prolific, persistent and well-connected. Wildlife crime investigation should be aimed towards gathering evidence for prosecution under anti-money laundering, proceeds-of-crime and anti-corruption laws. While governments fail to push to the full extent of the law to combat wildlife crime, criminals will continue to take advantage of weak legislation, lack of judicial awareness, absence of deterrents, and localised corruption.

## TSERING ATUP TAMANG

INDIA: Asian big cats



© WPSI

In Kanpur, India, in April 2001, Tsering Atup Tamang was arrested in connection with the seizure of 19 leopard skins and a tiger skin. Tamang was also in possession of a large amount of money. In January 2003, while on bail<sup>74b</sup> for the Kanpur offence, Tamang was again arrested, this time in Lucknow, India, in connection with the seizure of 12 leopard skins and again in possession of a large amount of cash. He was arrested with two other individuals connected with a transnational network supplying dealers in Tibet and China with skins poached from India. Tamang absconded while on bail. A citizen of Nepal but of Tibetan origin, Tamang is believed to be living in considerable style in Kathmandu, Nepal.

## VIXAY KEOSAVANG

LAOS: Rhino horn, lion bone, primates



Courtesy of Julian Rademeyer/  
Killing For Profit

Lemtongthai (right) is the self-confessed agent for Vixay Keosavang's (left) Laos-based business Xaysavang Trading Import-Export Company. Keosavang has emerged as one of the world's most notorious wildlife traders, involved in primate-trading, sourcing lion bones and rhino horn among other wildlife products. Within Laos, Keosavang appears to enjoy influential patronage and a network of high-level contacts. In November 2013, the US Government announced a US\$1 million reward for information leading to the dismantlement of the Xaysavang network, describing the company as having affiliates in South Africa, Mozambique, Thailand, Malaysia, Vietnam and China.<sup>75</sup> Another member of the syndicate, Punitak Chumchom, is wanted by South Africa and is the subject of an international INTERPOL Red Notice.

## PERSISTENT TRADER IN LINXIA

CHINA: Asian big cats



© EIA

During the course of five separate investigations, EIA has encountered the same Asian big cat trader and documented him selling 16 Asian big cat skins, claws and bones at the equivalent of US\$83,000.<sup>76</sup> Based in the town of Linxia, in China's Gansu Province, he is part of a trans-Himalayan network of traders sourcing skins and parts from India. Despite frequent exposure of this trading hub and the provision of his details to law enforcement, he remains at large and boasts of receiving tip-offs when inspections by the authorities are due to occur.

## "OAD BANGKRUAU"

THAILAND: Asian big cats (Bangkok)



© EPA

In February 2012, police discovered a slaughterhouse in Bangkok, processing tigers and other species into trophies for export. Several arrests were made including a male known as "Oad Bangkruay" under a warrant for suspected collusion to illegally possess carcasses of endangered animals and violation of Customs Act by smuggling wild animals.<sup>77</sup> Despite the circumstances, in January 2013, the main accused was found not guilty in court due to lack of evidence and witnesses,<sup>78</sup> and in the absence of a prosecutor's appeal, the case was closed.

## ANSON WONG

MALAYSIA: Reptiles, big cats, birds



© Dave Currey / EIA

Known as the 'Lizard King', Wong has a long history as a major wildlife trader, trafficking a host of endangered species ranging from snow leopards and tigers to birds and reptiles. He was arrested in Mexico in 1998 after a sting operation by US Fish and Wildlife Service agents and subsequently jailed in the US. Upon his release, he returned to Malaysia and resumed business. He was arrested again in 2010 in Malaysia attempting to smuggle reptiles and sentenced to five years in jail, subsequently reduced on appeal, and then freed in 2012.<sup>49</sup> Questions remain about lack of investigation into Wong's business contacts,<sup>70</sup> and some associates are reportedly still involved in illegal wildlife trading.



## WHAT NEEDS TO BE DONE?

© iStock / James Brey

**“We know what we need to do - the issue is whether we are going to do it. This will require political support from the highest level...”**

**John E Scanlon, Secretary General of CITES<sup>79</sup>**

Wildlife crime is surging due to rising demand, allied to high profits and the low risk of detection. Sophisticated criminal syndicates and networks have emerged to move contraband wildlife from remote areas to the booming cities where the main markets are located, abetted by the globalisation of trade, communication and finance.

Wildlife criminals are motivated by profit, and to date the enforcement response has failed to provide an effective deterrent when weighed against the huge financial rewards to be had. This situation is not unique to wildlife crime; it occurs in other areas such as narcotics. Yet lessons learnt from the global fight against transnational organised crime are not being adequately applied to curb the illegal wildlife trade.

All too often the enforcement focus falls on the lower levels of the supply chain – the poachers, couriers or end-buyers. Greater effort is needed to build evidence against the main culprits who lead the smuggling syndicates without getting their hands dirty. This involves painstaking investigations and detective work, inter-agency and international



© Debbie Banks / EIA

intelligence-sharing and the use of techniques such as forensics and controlled deliveries.

The current illegal wildlife trade crisis is prompting high-level political attention. It is vital that this turns into meaningful action to effectively tackle the problem through an adequate legal system with deterrent penalties, properly resourced multi-agency task forces and effective cross-border intelligence-sharing.

# RECOMMENDATIONS

To effectively combat organised wildlife crime, governments should take the following actions:

## STRENGTHEN LEGAL FRAMEWORKS

- Ensure that illegal wildlife trade is recognised as a serious crime, as stipulated in Resolution 40 of the UN Economic and Social Council adopted in July 2013
- Apply a variety of laws to prosecute wildlife criminals, such as anti-money laundering, proceeds-of-crime and anti-corruption laws
- Make wildlife crime a “predicate offence” under the Financial Action Task Force anti-money laundering provisions, a change which would enable forfeiture of criminal assets

## BUILD EFFECTIVE ENFORCEMENT

- Convene a ministerial level meeting of relevant ministries, such as home affairs, forests and wildlife, national parks, finance and justice ministries, to formulate a strategy to tackle wildlife crime
- Establish operational multi-agency enforcement units spanning all relevant agencies, including police, Customs, wildlife and prosecutors
- Embed wildlife crime training in the national curricula for police and Customs officers
- Establish national databases for the collation and analysis of wildlife criminal information
- Utilise specialist investigation techniques such as controlled deliveries, covert investigations and forensics
- Enhance awareness among the judiciary of the need to effectively tackle wildlife crime
- Make use of the International Consortium on Combating Wildlife Crime (ICWC) Forest and Wildlife Crime Analytic Toolkit to identify and close gaps in the criminal justice response to wildlife crime

## DISMANTLE INTERNATIONAL WILDLIFE CRIME NETWORKS

- Ensure intelligence is shared rapidly via existing channels such as INTERPOL’s i24/7 network and the World Customs Organisation’s Customs Enforcement Network
- Engage in coordinated and targeted cross-border enforcement operations
- Utilise mutual legal assistance treaties, extradition treaties and INTERPOL Red Notices to pursue fugitives

## SUPPRESS DEMAND

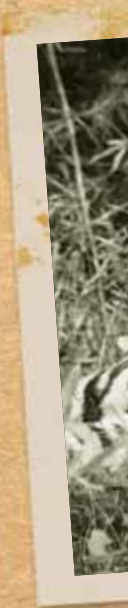
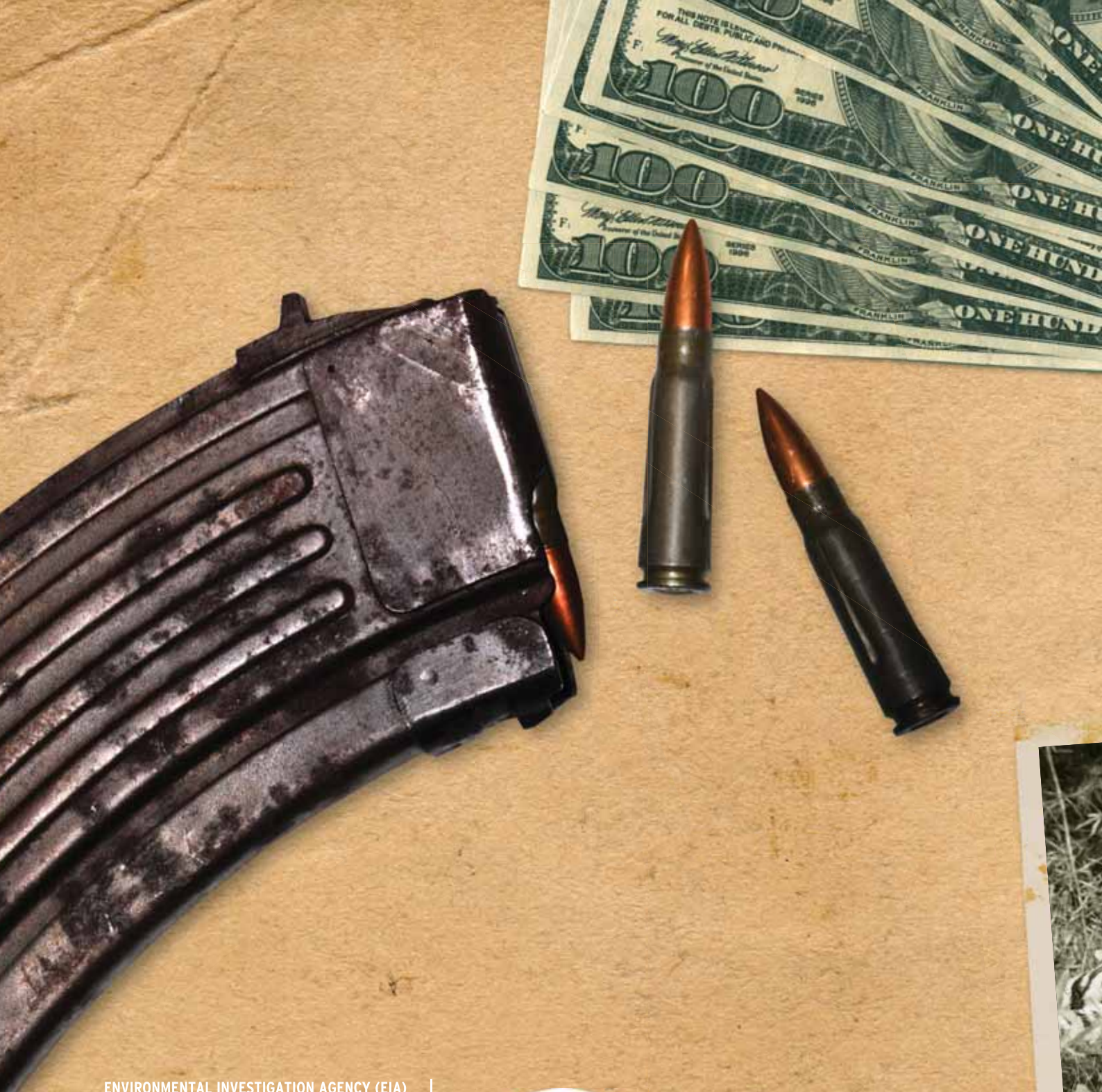
- Close down domestic ivory markets
- Inventory and destroy wildlife stockpiles, especially ivory, rhino horn and tiger parts and products
- End all trade in tiger parts and products, including those from captive-bred tigers



# REFERENCES

1. Tiger and leopard deaths from poaching and seizures for India, 1994-2013 from Wildlife Protection Society of India (WPSI), <http://www.wpsi-india.org> (2014 not shown at time of writing). Snow leopard, clouded leopard and Asiatic lion provided by WPSI May 2013. Outside India: EIA-compiled records, skin, carcasses and live only.
2. Center for Conservation Biology, Tracking poached ivory: research overview, <http://conservationbiology.uw.edu/research-programs/tracking-poached-ivory/accessed/14/01/2014>
3. EIA-compiled records for 2013 (ongoing)
4. Estimate at 31 December 2010, and AfRSG data 2011 cited at IUCN Red List: Ceratotherium simum, <http://www.iucnredlist.org/details/4185/0>
5. WWF, Rhino poaching sees 7,000% increase in six years, (20 January 2014), <http://www.wwf.org.uk/news/feed.cfm?6982/rhino-poaching-sees-7000-increase-in-six-years>
6. UN ECOSOC, Resolution adopted by the Economic and Social Council on 25 July 2013, 2013/40: Crime prevention and criminal justice responses to illicit trafficking in protected species of wild fauna and flora, [http://www.un.org/da/search/view\\_doc.asp?symbol=E/RES/2013/40](http://www.un.org/da/search/view_doc.asp?symbol=E/RES/2013/40)
7. See, e.g., UNODC, Report on Transnational Organized Crime in Eastern Africa: A Threat Assessment (September 2013), [http://www.unodc.org/documents/data-and-analysis/Studies/TOC\\_Africa\\_2013.pdf](http://www.unodc.org/documents/data-and-analysis/Studies/TOC_Africa_2013.pdf); CITES Secretariat, Monitoring of illegal trade in ivory and other elephant specimens CoP16 Doc. 53.2.1 (March 2013), <http://www.cites.org/eng/cop/16/doc/E-CoP16-53-02-01.pdf>
8. CITES Secretariat Presentation to CITES Silk Road Enforcement Seminar at Urumqi, China (2005). See also J. M. Sellar, International Illicit Wildlife Trafficking (2007) available at [http://www.olliechiefmagazine.org/magazine/index.cfm?issueaction=display\\_arch&article\\_id=1203&issue\\_id=62007](http://www.olliechiefmagazine.org/magazine/index.cfm?issueaction=display_arch&article_id=1203&issue_id=62007). In 2003, the report of the UN Economic and Social Council Secretary General, to the 11th Session of the Commission on Crime Prevention and Criminal Justice listed indicators of organised crime: item E/CN.15/2003/8 at <http://www.unodc.org/unodc/en/commissions/CCPCJ/session12.html>
9. EIA, A deadly game of cat and mouse: How tiger criminals give China the run-around, (2009), providing findings of investigations in China where a trader had told EIA that following a seizure of a large-scale consignment of Asian big cat parts, he had started sourcing skins and bones in smaller consignments from India.
10. See, e.g., U.S. Law Library of Congress, Global Legal Research Center (Jan. 2013), Wildlife Trafficking and Poaching, [http://www.loc.gov/law/help/wildlife\\_trafficking\\_and\\_poaching-2013-008667.pdf](http://www.loc.gov/law/help/wildlife_trafficking_and_poaching-2013-008667.pdf) (explaining that wildlife trafficking is not treated as a criminal offence in Mozambique)
11. United Nations Office on Drugs and Crime (2012), International Consortium on Combating Wildlife Crime Wildlife and Forest Crime Analytic Toolkit, Vienna: United Nations, [https://www.unodc.org/documents/Wildlife/Toolkit\\_e.pdf](https://www.unodc.org/documents/Wildlife/Toolkit_e.pdf)
12. UN General Assembly, Resolution adopted by the General Assembly 55/25: United Nations Convention against Transnational Organized Crime, <http://www.un-documents.net/a55r25.htm> (distributed 10 November 2000)
13. UN ECOSOC Resolutions: 2001/12 (24 July 2001), <http://www.un.org/en/ecosoc/docs/2001/resolution%202001-12.pdf>; 2003/27 (22 July 2003), <http://www.un.org/en/ecosoc/docs/2003/resolution%202003-27.pdf>; 2008/25 (24 July 2008), <http://www.un.org/en/ecosoc/docs/2008/resolution%202008-25.pdf>; 2011/26 (28 July 2011), <http://www.un.org/en/ecosoc/docs/2011/res%202011-26.pdf>
14. Commission on Crime Prevention and Criminal Justice, Resolution 16/I: International cooperation in preventing and combating illicit international trafficking in forest products, including timber, wildlife and other forest biological resources, [http://www.unodc.org/documents/commissions/CCPCJ/CCPCJ-ECOSOC/CCPCJ-ECOSOC-00/CCPCJ-ECOSOC-07/Resolution\\_16-I.pdf](http://www.unodc.org/documents/commissions/CCPCJ/CCPCJ-ECOSOC/CCPCJ-ECOSOC-00/CCPCJ-ECOSOC-07/Resolution_16-I.pdf)
15. UN General Assembly, Resolution adopted by the General Assembly on 27 July 2012 66/288: The future we want, [http://www.un.org/en/ga/search/view\\_doc.asp?symbol=A/RES/66/288](http://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/66/288)
16. Yury Fedotov and John E Scanlon (Sept. 2013), Wildlife crime ranks among trafficking in drugs, arms and humans, <http://www.theguardian.com/environment/2013/sep/26/wildlife-crime-trafficking-drugs-arms>
17. Memorandum of Understanding Between the General Secretariat of ICPO-INTERPOL and the Secretariat of the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES) (1998), at <http://www.cites.org/common/disc/sec/CITES-Interpol.pdf>
18. INTERPOL, INTERPOL launches National Environmental Security Task Force initiative (8 September 2012), <http://www.interpol.int/News-and-media/News-media-releases/2012/N20120918quater>
19. CITES, INTERPOL, UNODC, World Bank, World Customs Organisation joint press release, Powerful alliance to fight wildlife crime comes into effect (23 November 2010), [http://www.cites.org/eng/news/pr/2010/20101123\\_ICCW.php](http://www.cites.org/eng/news/pr/2010/20101123_ICCW.php)
20. CITES, INTERPOL, UNODC, World Bank, World Customs Organisation joint press release, ICWC launches wildlife and forest crime toolkit (25 July 2012), [http://www.cites.org/eng/news/pr/2012/20120725\\_ICCW\\_toolkit.php](http://www.cites.org/eng/news/pr/2012/20120725_ICCW_toolkit.php)
21. UN ECOSOC, Resolution adopted by the Economic and Social Council on 25 July 2013, 2013/40: Crime prevention and criminal justice responses to illicit trafficking in protected species of wild fauna and flora, [http://www.un.org/da/search/view\\_doc.asp?symbol=E/RES/2013/40](http://www.un.org/da/search/view_doc.asp?symbol=E/RES/2013/40)
22. African Development Bank and WWF, The Marrakech Declaration: A 10-point action plan to combat illicit wildlife trafficking (30 May 2013), [http://www.wwf.org.uk/what\\_we\\_do/press\\_centre/?newsid=6615](http://www.wwf.org.uk/what_we_do/press_centre/?newsid=6615)
23. CITES, Royal efforts to support fight against illegal wildlife trafficking (21 May 2013), [http://www.cites.org/eng/news/pr/2013/20130521\\_royal\\_wildlife\\_trafficking.php](http://www.cites.org/eng/news/pr/2013/20130521_royal_wildlife_trafficking.php)
24. The White House Office of Press Secretary, Executive Order - Combating Wildlife Trafficking (01 July 2013), <http://www.whitehouse.gov/the-press-office/2013/07/01/executive-order-combating-wildlife-trafficking>
25. Bryan Christy in National Geographic, Opinion: China's Ivory Crush Is Important First Step (8 January 2014), <http://news.nationalgeographic.com/news/2014/01/140108-china-ivory-crush-illegal-endangered-elephant-animals-poaching-science/>; Kim Willsher, France destroys illegal ivory stocks (06 Feb. 2014), <http://www.theguardian.com/environment/2014/feb/06/france-destroys-illegal-ivory-poaching>
26. CITES UN General Assembly, side event (26 September 2013), [http://www.cites.org/eng/news/sq/2013/20130926\\_unga\\_side-event.php](http://www.cites.org/eng/news/sq/2013/20130926_unga_side-event.php)
27. AVA press release (23 July 2013) [http://www.ava.gov.sg/NR/rdonlyres/C8A609F5-788C-4C36-819F-875DD1E5727E/26406/PressRelease\\_AVAREPATRIATESIVORYTOAFRICA.pdf](http://www.ava.gov.sg/NR/rdonlyres/C8A609F5-788C-4C36-819F-875DD1E5727E/26406/PressRelease_AVAREPATRIATESIVORYTOAFRICA.pdf)
28. Hong Kong Customs, Hong Kong Customs seize 3.9 tons of elephant tusks (10 May 2006) [http://www.customs.gov.hk/en/publication\\_press/index\\_id\\_624.html](http://www.customs.gov.hk/en/publication_press/index_id_624.html)
29. A. Gossmann (2009), Tusks and trinkets: An overview of illicit ivory trafficking in Africa, African Security Review: Vol 18 No 4 (Institute of Security Studies: Pretoria, South Africa), <http://www.isn.ethz.ch/Digital-Library/Publications/Detail/?ots591=0c54e3b3-1e9c-be1e-zc24-a6a87060233&lng=en&id=112070>
30. Conde Nast Traveller, Tracking the Slaughterer: How LAGA Helped Bust the Largest Kong Smuggling Ring in Africa (undated), <http://www.cntraveler.com/daily-traveler/2012/10/laga-busts-smuggling-ring-africa-wildlife-crimes>
31. INTERPOL, Cameroon and Hong Kong win INTERPOL award for fighting wildlife crime (20 April 2007), <http://www.sheldrickwildlifetrust.org/PDF/IvoryApocalypse.pdf>
32. Sheldrick Wildlife Trust, Ivory Apocalypse (2013), <http://www.sheldrickwildlifetrust.org/PDF/IvoryApocalypse.pdf>
33. LAGA, Sanitised briefing (02 May 2008)
34. Center for Conservation Biology, University of Washington, Tracking poached ivory (accessed 2 December 2013), <http://conservationbiology.uw.edu/research-programs/tracking-poached-ivory/>
35. LAGA, Sanitised briefing (02 May 2008)
36. Sheldrick Wildlife Trust, Ivory Apocalypse (2013), <http://www.sheldrickwildlifetrust.org/PDF/IvoryApocalypse.pdf>
37. Wildlife Protection Society of India (WPSI), Sansar Chand finally arrested (30 June 2005), <http://www.wpsi-india.org/news/30062005.php>
38. Malini Shankhar in India Together, Revisiting the arrest of Sansar Chand (28 February 2009), <http://www.indiatogether.org/2009/feb/env-sanchand.htm>
39. Malini Shankhar in India Together, Revisiting the arrest of Sansar Chand (28 February 2009)
40. Wildlife Protection Society of India (WPSI), Sansar Chand finally arrested (30 June 2005)
41. Wildlife Protection Society of India (WPSI), Poacher Sansar Chand revealed Tibet, Nepal links: CBI (06 February 2006), <http://www.wpsi-india.org/news/06022006.php>
42. Wildlife Protection Society of India (WPSI), Notorious wildlife criminal Sansar Chand gets bail (31 May 2012), <http://www.wpsi-india.org/news/01062012.php>
43. Wildlife Protection Society of India (WPSI) pers comms (06 and 09 December 2013)
44. EIA-WPSI investigations 2005-2012 inclusive, and hundreds pieces of skin on chupa not included in this count
45. INTERPOL, Nepal police seize tiger parts and arrest seven during intelligence-led actions (23 January 2013), <http://www.interpol.int/News-and-media/News-media-releases/2013/N20130123>
46. Times of India, MP forest department officials fail to get their act together (17 September 2013), [http://articles.timesofindia.indiatimes.com/2013-09-17/bhopal/42147995\\_1\\_national-tiger-conservation-authority-tiger-bones-ntca](http://articles.timesofindia.indiatimes.com/2013-09-17/bhopal/42147995_1_national-tiger-conservation-authority-tiger-bones-ntca)
- 47a. National Tiger Conservation Authority of India, Tigernet, <http://www.tigernet.nic.in/Alluser/Default.aspx>
- 47b. Wildlife Protection Society of India (WPSI), Tiger and leopard deaths from poaching and seizures for 2013, <http://www.wpsi-india.org/wpsi/index.php, as accessed 23 January 2014>
48. Delhi Police Crime Branch, Press Release (08 September 2013)
49. Delhi Police Crime Branch, Press Release (08 September 2013)
50. Times of India, Sarju's trail for 6 months ends in 8 days (10 September 2013), [http://articles.timesofindia.indiatimes.com/2013-09-10/nagpur/41936471\\_1\\_tiger-skin-sarju-bagdi-forest-department](http://articles.timesofindia.indiatimes.com/2013-09-10/nagpur/41936471_1_tiger-skin-sarju-bagdi-forest-department)
51. CCTV, [法治在线] 雪域惊天案 (14 February 2004), <http://www.cctv.com/news/china/20040805/101605.shtml>
52. Wildlife Protection Society of India (WPSI), Death sentence for smuggling animal skins (8 October 2004)
53. EIA investigations 2009, conversations with traders
54. WWF, Rhino poaching sees 7,000% increase in six years, (20 January 2014), <http://www.wwf.org.uk/news/feed.cfm?6982/rhino-poaching-sees-7000-increase-in-six-years>
55. CITES Secretariat: Report of the Secretariat; Rhinoceros CoP16 Doc54.2 (Rev 1), <http://www.cites.org/eng/cop/16/doc/E-CoP16-54-02.pdf>
56. Chair of the Standing Committee Working Group on Rhinoceroses, Report of the Working Group CoP16 Doc. 54.1 (Rev. 1), <http://www.cites.org/eng/cop/16/doc/E-CoP16-54-01.pdf>
57. Total from sources: Czech Environmental Inspectorate, CITES News 105/2013 and Associated Press, Rhino horns seized at Prague Airport (16 January 2014), <http://www.boston.com/news/world/europe/2014/01/16/rhino-horns-seized-at-prague-airport/>
58. Czech Environmental Inspectorate, Presentation to INTERPOL Environmental Compliance and Enforcement Events 2013 (November 2013)
59. Total quantity from EIA records based on Hong Kong Customs press releases; case updates provided by CITES MA Hong Kong (pers comms 2013)
60. Southeast Network, 厦门海关查获走私象牙 价值6亿人民币 (5 November 2013), <http://news.sina.com.cn/c/2013-11-05/125928625380.shtml>
61. International Business Daily, 国内三美狼打象牙走私的七寸 (12 November 2013), <http://collection.sina.com.cn/vj/20131112/0803131510.shtml>
62. International Business Daily, 国内三美狼打象牙走私的七寸 (12 November 2013), <http://collection.sina.com.cn/vj/20131112/0803131510.shtml>
63. World Customs Organisation, Massive Ivory Seizure by Royal Malaysian Customs (December 2012), <http://www.wcoomd.org/en/media/newsroom/2012/december/ivory-seizure-malaysian-customs.aspx>
64. World Customs Organisation, Customs Enforcement Network, <http://www.wcoomd.org/en/topics/enforcement-and-compliance/instruments-and-tools/cen.aspx> (accessed 06 December 2013)
65. World Customs Organisation, Regional Intelligence Liaison Offices (RILO), <http://www.wcoomd.org/en/topics/enforcement-and-compliance/instruments-and-tools/riilo.aspx> (accessed 06 December 2013)
66. WCO RILO AP Alert 09/2012, 1.5 tons of ivory tusks seized by Sri Lanka Customs (22 May 2012), [http://www.aduanas.gub.yu/innovaportal/file/9884/1/alerta\\_riilo\\_asia\\_cites.pdf](http://www.aduanas.gub.yu/innovaportal/file/9884/1/alerta_riilo_asia_cites.pdf)
67. Wildlife Protection Society of India (WPSI), Tiger poachers behind killing of Gir Lions (7 April 2007), <http://www.wpsi-india.org/news/07042007.php>
68. Down to Earth, Forensics can easily be used in wildlife (15 June 2009), <http://www.downtoearth.org.in/node/3452>
69. Down to Earth, Forensics can easily be used in wildlife (15 June 2009), <http://www.downtoearth.org.in/node/3452>
70. Bryan Christy, Anson Wong Goes Free (28 February 2012), <http://news.watch.nationalgeographic.com/2012/02/28/anson-wong-goes-free/>
71. SM Mohd Idris, Sabahat Alam Malaysia, letter to the editor Free Malaysia Today (06 December 2013): "The gravest mistake is when no investigations were conducted into the business contacts or associates of Wong upon confiscation of his laptop and mobile phones by the Malaysian Anti-Corruption Agency (MACC). It brought unanswered questions as to why no business contacts or associates of Wong were ever identified or charged. It gives the implication that the authorities were keeping their eyes closed with the intention to protect the trafficker implicated in the trade", available at <http://www.freemalaysiatoday.com/category/opinion/2013/12/06/authorities-must-wake-up-to-antics-of-wong/>
72. Julian Rademeyer, USS1-million bounty for wildlife crime syndicate exposed in Killing for Profit (18 November 2013) Minister of Environmental Affairs South Africa, Edna Molewa, Edna Molewa welcomes sentencing of Chumlong Lemthongthai to 40 years in jail (11 November 2012), <http://www.politicsweb.co.za/politicsweb/view/politicsweb/page/71619?doi=339453&sn=Detail&id=71619>
73. SAB News, Convicted Rhino Poacher Chumlong Lemthongthai won appeal (undated), <http://www.youtube.com/watch?v=9Mz2i078Y20>
- 74a. 3rd Degree film, Greed, Superstition and Slaughter (2012)
- 74b. EIA (2004), Tiger Skin Trail, <http://www.eia-international.org/the-tiger-skin-trail-report>
75. US Department of State, Press Statement by John Kerry Secretary of State, First Reward Offer for Transnational Organized Crime Information (13 November 2013), <http://www.state.gov/secretary/remarks/2013/11/217558.htm>
76. Total of RMB 515,950 for sixteen skins at the premises. Prices correct as quoted each year and multiplied by amount of skins per species offered that particular year by this trader. In cases where a price range was given, an average price has been used.
77. Bangkok Post, Man accused of selling tiger meat (08 February 2012)
78. WFFT tweet update (31 January 2013), <https://twitter.com/EdwinWiek/status/296936368268005377> and The Big Chilli interview (05 June 2013), <http://www.thebigchilli.com/1/post/2013/06/raided-by-armed-officials-arrested-harassed-and-living-in-fear-for-his-life-if-edwin-wiek-rescues-wild-animals-that-have-been-maltreated-and-neglected-by-humans.html>
79. John Scanlon (Sept 2013), Opening Remarks at the High-Level Panel Discussion on "Poaching and Illicit Wildlife Trafficking - A multidimensional crime and a growing challenge to the international community," UN General Assembly side event, New York, [http://www.cites.org/eng/news/sq/2013/20130926\\_unga\\_side-event.php](http://www.cites.org/eng/news/sq/2013/20130926_unga_side-event.php)





ENVIRONMENTAL INVESTIGATION AGENCY (EIA)

EIA - LONDON

62/63 Upper Street

London N1 0NY, UK

Tel: +44 (0) 20 7354 7960

Fax: +44 (0) 20 7354 7961

email: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)

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



EIA - WASHINGTON, DC

PO Box 53343

Washington, DC 20009 USA

Tel: +1 202 483-6621

Fax: +1 202 986-8626

email: [info@eia-global.org](mailto:info@eia-global.org)

[www.eia-global.org](http://www.eia-global.org)