

A close-up, high-resolution photograph of a tiger's face, focusing on its eyes and nose. The tiger's fur is a mix of brown, black, and white, with distinct stripes. The eyes are a golden-brown color and are looking slightly to the right. The nose is a reddish-brown color. The background is dark, making the tiger's face the central focus.

ENFORCEMENT NOT EXTINCTION

Zero tolerance on tiger trade



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EXECUTIVE SUMMARY

The International Tiger Forum held in November 2010 in Saint Petersburg, Russia, provides an exciting opportunity. Convened by Prime Minister Vladimir Putin, leaders of Tiger Range Countries (TRC) endorsed a declaration and Global Tiger Recovery Program (GTRP) to double the tiger population by 2022, the next Year of the Tiger, setting the tone for future national and global efforts.

Many of the strategies advocated in the Forum have been proposed repeatedly since the last Year of the Tiger. Some are older still. On paper they appear objective, logical and scientific – yet governments have failed to implement them thoroughly or consistently.

Will this time be any different? Can world leaders rise to the challenge and deliver meaningful action, not simply fine words?

Drawing on EIA's experience of investigating the illegal trade in consumer countries, this position paper highlights the key recommendations on law enforcement that have consistently been made over the years and examines the possible underlying reasons why they have not yet been implemented. Accepting that these enforcement recommendations are still key to the survival of the wild tiger, we identify actions that governments can take to overcome those obstacles and demonstrate real progress and change on the ground.

We call upon governments to prioritise the following:

- Secure greater involvement of police and Customs officers in tiger and other Asian big cat conservation
- Reduce demand for tiger and other Asian big cat parts
- Expand the use of intelligence-led enforcement in combating tiger trade
- Improve international cooperation to disrupt transnational criminal networks
- Continue with reform of judicial processes
- Increase resources to combat wildlife crime
- Improve the motivation of enforcement personnel
- Tackle corruption in wildlife crime

1993

International Symposium on the Tiger held in New Delhi, India

China bans domestic trade in tiger bone and tiger bone medicines

1994

CITES Parties urged to adopt legislation against killing of tigers (Resolution Conf. 9.13)

Global Tiger Forum (GTF) holds its first meeting in India



INTRODUCTION

The survival of the wild tiger symbolizes hope for humanity in a manner quite unlike that of any other species, and with reason. The political commitment and investment necessary to reverse the tiger's decline will be nothing short of revolutionary. It will require the same change of attitudes and practices needed to make good on global promises to eradicate poverty or mitigate climate change. As a symbol of the forests and ecosystems of which it is a part, the tiger is an iconic barometer of how sincere and effective that commitment is.

The tiger is also a political animal, subject to the highest levels of attention – from when Mao first declared it a pest in the 1950s to when Indira Gandhi launched Project Tiger in 1973. For better or worse, it is profound acts of political will such as these which have determined the fate of wild tigers.

Now, in 2011, at the end of the Chinese Year of the Tiger there are as few as 3,200 remaining across their range. It is time for world leaders to acknowledge that if we cannot save the wild tiger, there is little hope of success in tackling the other environmental challenges we face. It is time to unite over a groundbreaking pledge, backed by swift action and credible resources.

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Will this time be any different? Can world leaders rise to the challenge and deliver meaningful action, not simply fine words? Even as we write this there are continuing reports of habitat destruction and industrial developments in tiger forests.

The Environmental Investigation Agency (EIA) has been probing the international illegal trade in tiger and Asian big cat parts and derivatives since 1994, throughout Europe, the USA and Asia. Most recently,

with colleagues at the Wildlife Protection Society of India (WPSI), EIA has exposed the nature and dynamics of the trans-Himalayan trade and the role of persistent offenders operating through transnational criminal networks.

As a campaigning organisation, EIA has identified and lobbied for enforcement strategies to bring change, engaging the professional enforcement community to target the criminals who control the trade. Many of these strategies are compatible with government promises, past and present.

Yet TRC government enforcement strategies have not necessarily evolved to keep pace with criminal operations; actionable intelligence has not been gathered, analysed and shared effectively, and international communication and cooperation still appear to be difficult. It is clear that there has never been any serious recognition or examination of the barriers to these essential activities.

This position paper therefore reflects on the nature of the illegal trade, examines the underlying causes impeding the implementation of enforcement-related recommendations and suggests immediate and longer-term actions we believe will be meaningful indicators of whether the direction set at the Forum will indeed lead along the path to recovery.

The next twelve years demand something different. The opportunity presented by the Forum must not be squandered on little more than an insubstantial political group hug on paper or the hollow reiteration of existing agreements. It must be characterized by an honest appraisal of existing problems, backed with far-reaching actions, meaningful pledges and financial commitments which go beyond all that has been promised before, to ensure zero tolerance on all tiger trade. So far we have heard many warm speeches.

Indeed, without a monumental shift in political will and genuine leadership, the obstacles hampering success will continue to plague global efforts. As a non-governmental organisation, EIA has a duty to call upon the Forum to reach beyond platitudes, to signify the beginning of an era of concrete action before it is too late.

After all, who wants to live in a world without tigers?

EIA, February 2011

"Next year, you can sell it [the tiger skin] for even more ... because, if you count the years, next year is the Year of the Tiger..."

Expectation expressed by a tiger skin trader in 2009

1995

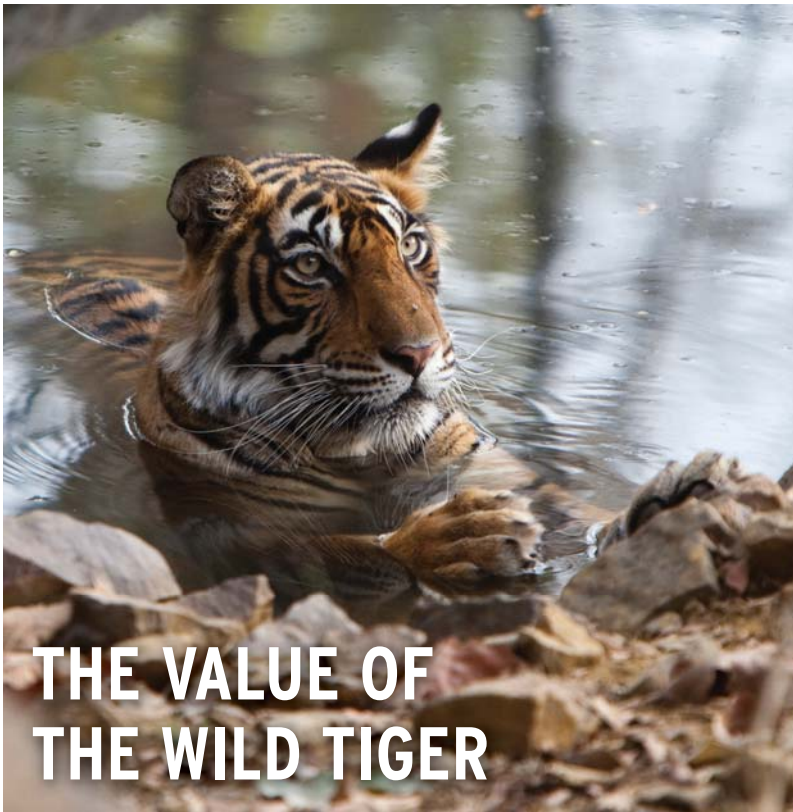
Statement at Beijing workshop urges regional cooperation in Asia

India and China sign protocol on tackling tiger trade

Russia reports creation of an anti-poaching brigade

1996

China reports its 'highest priority' as being to stop illegal cross-border wildlife trade (CITES SC 37)



THE VALUE OF THE WILD TIGER

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TOP:

'Tiger pattedar pani ka devta hai' - the tiger is a striped water god! India's Sanctuary magazine's rallying cry.

ABOVE:

The tiger is a vehicle for the Hindu Goddess Durga, just one of many examples of the tiger's religious and cultural value.

For millions of people in TRCs, and around the world, the tiger is a powerful cultural icon. For some it represents wildness in its truest form, a symbol of hope for a better world; for others it is a living god to be revered, worshipped and feared. Many more identify with its strength and beauty, and it occupies a central place in the folklore of those countries in which it is found. Alongside these cultural motivations there are other important reasons why the survival of the tiger impacts on us all, many of which have been recognised in the GTRP.

1) ECOSYSTEM SERVICES - THE WATER GOD

The tiger is an indicator of the health of the ecosystems in which it lives. The forests and grasslands in which tigers live support a wide array of biodiversity and store vast amounts of carbon, mitigating climate change. Tiger forests regulate the weather, influencing rainfall patterns across wide areas. The same forests, grasslands and wetlands help prevent flooding, drought and soil erosion. Protecting existing tiger habitats and the reforestation of degraded habitat may help buffer the poorest communities in Asia against the impacts of river siltation and flooding, while providing global benefits.

2) CULTURAL IMPORTANCE - THE SOUL OF ASIA

The tiger has been revered by forest communities for centuries: worshipped as a protector against evil spirits and as the vehicle of deities; conjured by shamans travelling to the spirit world; appeased through ritual ceremonies before entering the forests. Valmik Thapar's *The Cult of the Tiger*¹ offers numerous historical accounts of how humans have been enchanted by the tiger, noting that although the advent of the gun and widespread hunting shattered the sanctity of the beliefs of many, there remain thousands of people in Asia for whom the folklore of the tiger is still alive.

3) AN INDICATOR OF THE DECLINE OF OTHER SPECIES

It is often said that protecting tigers will protect other species. An example relates to the other big cats of Asia. The threats facing wild tigers are also devastating other Asian big cat populations. The skins and other body parts of leopards, snow leopards, clouded leopards and Asiatic lions are traded, often as tiger substitutes in the case of bones, while the skins of the spotted cats are desired as cheaper alternatives for luxury home décor and taxidermy. The ratio of tigers seized in relation to leopards has at times been more than 1:10.²

Habitat destruction and associated natural prey decline, as well as the hunting of prey species, forces leopards and snow leopards into conflict with local communities and the vicious cycle of human-predator conflict.

The same solutions mooted for tiger conservation would, if implemented, also address the conservation needs of other Asian big cats and species affected by wildlife crime and deforestation. Indeed, ignoring this fact remains a major flaw in the arguments advanced by proponents of tiger farming and a legalised tiger trade – not only would such practices be detrimental to tigers by stimulating further demand, they do nothing to address the conservation needs of other Asian big cats.

4) A POTENTIAL SOURCE OF INCOME

One of the biggest obstacles to tiger recovery has been the disenfranchisement of communities living around them.

Communities that feel few benefits from the tiger's presence may be less inclined to alert authorities to poachers and more likely to poison the carcasses of livestock killed by a tiger.

But tigers could generate significant income for local communities, particularly through tourism, with a share of profits going to community trusts. This has been most effectively implemented to date in Nepal.³ While there are examples of genuine community-led tourism throughout Asia, they are few and far between. Community-based crafts and arts can generate local income, such as Ranthambore School of Art in India, while health and education camps in the name of the tiger attempt to foster good relations with communities.

Capacity building and husbandry programmes to minimise conflict with wildlife, and NGO interventions to plug the gaps left by failed government compensation schemes, are among other efforts to engage communities.

To overcome breakdowns in the system of governance or localised corruption, which undermine compensation schemes, lessons can be learned from snow leopard conservation where devolving the administration to communities has met with initial success.⁴

5) A MEANS OF CATALYSING IMPROVED GOVERNANCE

The survival of wild tigers is an indicator of good environmental governance at a local level. With the right people in the right place; good leadership in the field combined with working relationships between officials, communities, scientists and NGOs, tiger populations have recovered.

Institutionalising examples of good governance, and elevating the political and financial status of the beleaguered environmental and forest departments, filling posts with motivated highly trained and well-equipped anti-poaching and wildlife management personnel, or creating a dedicated wildlife service and flushing out the rot in the system with anti-corruption drives, will not just benefit tigers but society at large.



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ASIAN BIG CATS UNDER THREAT

Little more than a century ago, there were an estimated 100,000 wild tigers on the planet. Today there are probably fewer than 3,200. Across their range, tigers are seriously threatened by poaching to feed the illegal trade in skins and bones, habitat destruction and the decline in natural prey populations. Tigers (*Panthera tigris*) have been listed on Appendix I of the UN Convention on International Trade in Endangered Species (CITES) since 1975, with the exception of the Siberian sub-species which was added in 1987. All international and domestic trade in tiger parts and products is flatly prohibited but the demand for tiger bone for traditional medicine and the burgeoning market for skins continues, and a recent analysis by TRAFFIC reveals that on an average a minimum of 104 tigers have entered trade every year between 2000 and 2010^{5a}. In India, home to nearly half of the world's remaining wild tigers, the current population is officially estimated to be 1,411.^{5b}

Asian leopards (*Panthera pardus*) and snow leopards (*Uncia uncia*) face the same threats to their survival. There are no reliable estimates for leopard populations throughout Asia, but several subspecies are listed as critically endangered.⁶ It is thought that there are currently just 3,500 to 7,000 snow leopards spread across the central Asian mountain ranges, from Afghanistan to Mongolia.⁷ Leopards and snow leopards have both been on CITES Appendix I since 1975.



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CHANGING DYNAMICS OF THE TIGER TRADE

ABOVE:

Tiger and leopard skins for sale in Litang, Sichuan Province of China, 2005. Despite the international alarm being raised in 2000 over the escalating skin trade, tiger, leopard and snow leopard skins were still being openly sold in China five years later.

The illegal trade in tigers, and indeed other Asian big cats, is constantly evolving as the criminals controlling it adapt to enforcement incidents, changes in consumer attitudes, the impact of awareness campaigns and emerging markets. It is essential that governments invest in mechanisms to be proactive and keep pace with such change to effectively combat wildlife crime.

Decline in formal medicine trade

In the early 1990s, China emerged as a major importer and consumer of tiger bone and an exporter of tiger bone products, surpassing Thailand and Indonesia as the primary supplier to markets in South Korea and Japan. China's growing domination of the marketplace coincided with reports of increased tiger poaching in India, starting in the late 1980s.⁸

In 1993, following intense international pressure, China introduced a domestic trade ban on the sale of tiger parts and derivatives. This was aided by donors and NGOs launching global campaigns to engage the practitioners of Traditional Asian Medicines, working together to promote alternatives. Despite the official move away from patented and packaged tiger bone medicines, tigers continued to be poached in India, where the high-profile pursuit of major wildlife trafficker Sansar Chand dominated the national headlines. In 1993, one of his suspected associates was arrested in Delhi during

the seizure of a staggering 287kg of tiger bones, eight tiger skins and 43 leopard skins.⁹

In December 1999, the illegal tiger trade again exploded onto the international agenda with the seizure in India of a large consignment of skins: three tiger, 50 leopard and five otter in one truck in Ghaziabad, Uttar Pradesh. Weeks later, in January 2000, leads from this seizure resulted in a massive haul in the small town of Khaga, also in Uttar Pradesh, comprising four tiger, 70 leopard, 221 otter skins, 175kg of tiger bone, 132 tiger claws and approximately 18,000 leopard claws. A major 'processing' and tanning operation had been uncovered just a short walk from the Khaga police station. Not only was the skin trade escalating, there was clearly still demand for bones and other body parts. Information from both seizures suggested the old trade connections with Tibet and China were still flourishing.

The Wildlife Protection Society of India (WPSI) swung into action. Since 1994, it had kept detailed records of thousands of wildlife crime incidents dating back to the 1970s, with the advent of India's Wildlife (Protection) Act in 1972. WPSI started mapping the criminal networks behind the trade, using historical intelligence as well as new details emerging from seizures in India and Nepal throughout 2000–02. They also used information recovered from arrested

individuals and seized specimens, including signatures, telephone numbers and diary notes.

The 'Tibetan' market

At the time of the Khaga seizure, it was unclear to what extent tiger and other Asian big cat skins were going only as far as Tibet and how many were entering into trade in mainland China. While the use of strips of tiger skin among the Tibetan community was historically documented as the preserve of the political and military elite,¹⁰ images taken by travellers to the region in the mid-1990s showed the use of entire tiger and leopard skins to decorate traditional costumes (chupa), although it was not clear from such reports whether these were old or new skins, and whether it was a handful of people or hundreds.¹¹

In 2002, Tibetan traders in Nepal told EIA investigators that the primary demand for tiger, leopard and otter skins was to decorate chupa, with skins mostly moving from India directly into Tibet along traditional trade routes via Ladakh and Shimla.

In 2003, the biggest-ever seizure of skins took place in Sangsang, just outside Lhasa, Tibet Autonomous Region (TAR). A total of 31 tiger, 581 leopard and 778 otter skins were recovered in one truck. The Anti-Smuggling Bureau of Lhasa Customs General Administration investigated and subsequently revealed the three arrestees had travelled all the way from Ali County in the West of Tibet (known as Ngari County in Tibetan). They had spent a couple of months in a guest house in Shiquanhe making phone calls, including abroad, and had been arrested by Chinese police for attempting to illegally cross the border into India, but were subsequently released.¹² Customs released images of the haul, with dated Delhi newspapers stuck to the rear of some.¹³ Sadly, the information surrounding the international phone calls was not shared with India, hampering any follow-up investigation there.

In 2004, EIA produced a briefing paper for Chinese Customs and the CITES Management Authority, using open source information on trade in the region and information generated by WPSI investigations. This included information on individuals absconding

from India, believed to be in hiding in Nepal and engaging with buyers in China.

The briefing preceded EIA's first reconnaissance visit to Lhasa, TAR, during which it documented whole leopard skin and leopard skin-decorated chupa for sale. One trader told EIA's Chinese-speaking colleagues they had tiger skin available at more than 10 times the price of leopard, and that buyers were wealthy Chinese from the mainland looking for skins to decorate their sofas. Full details were again shared with the relevant authorities.

By the end of 2004, news was beginning to emerge¹⁴ that all the tigers in India's Sariska Tiger Reserve had been exterminated, while the loss of tigers in Panna Tiger Reserve was also reported.¹⁵ Four years on from Ghaziabad and the trade in skins was still spiralling out of control.

In 2005, EIA and WPSI returned to the TAR, to the provinces of Sichuan and Gansu. Attending traditional horse-racing festivals and local markets, EIA and WPSI documented the scale of demand and the open ease with which trade in tiger and leopard skins was conducted. The team was staggered, not only at the open display, use and sale of Asian big cat skins, but by the sheer volume of skins.

BELOW:

Traders in Tibet confirmed that skins are signed at time of selection from a stockpile.

BOTTOM:

Despite the decline in the availability of packaged tiger bone medicines in China, raw tiger bones continue to be bought and sold for medicinal purposes.



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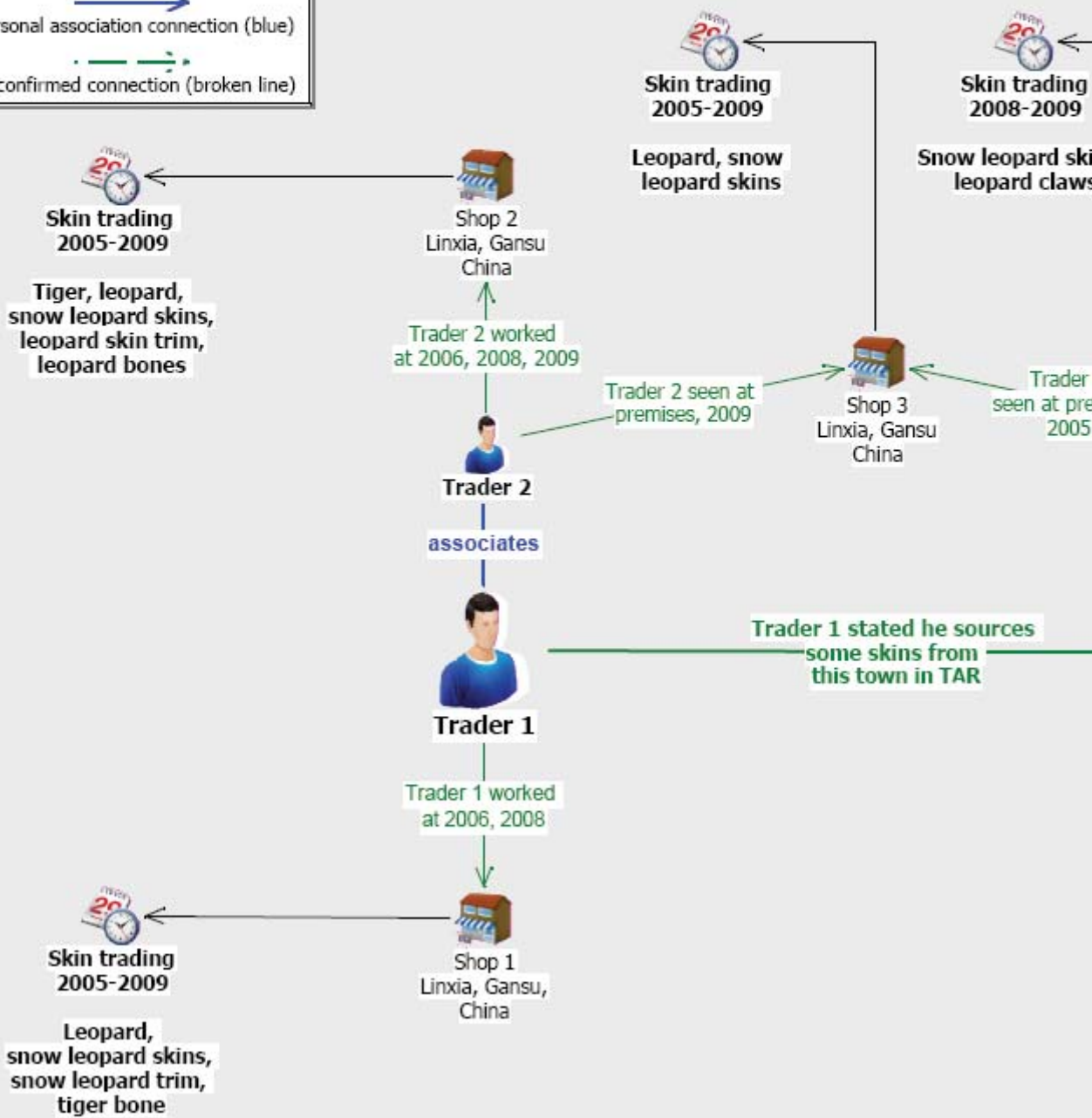
© Nick Mole / EIA

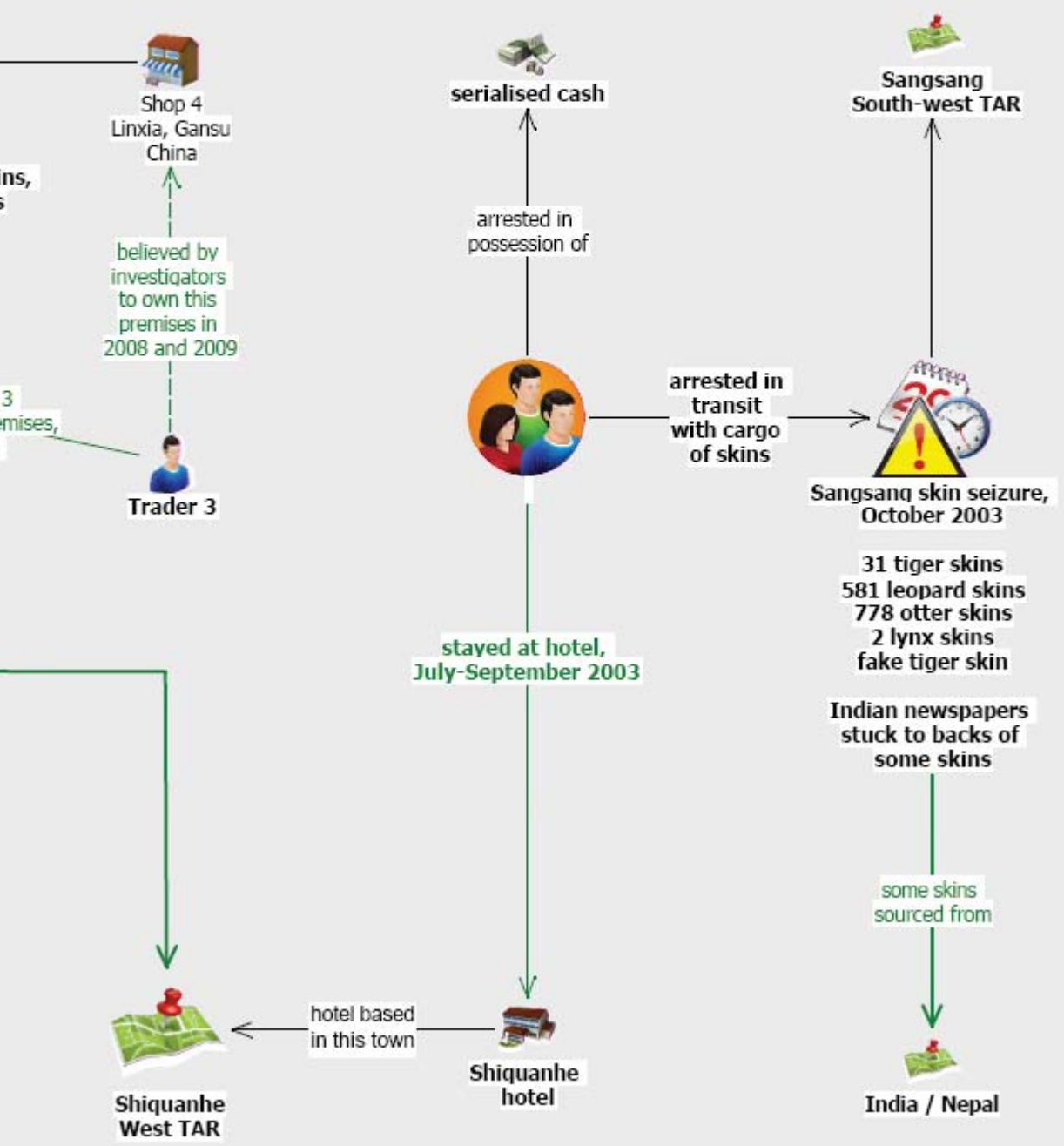


NGO investigations encounter both premises and traders repeatedly involved in illegal activity, indicating:

- **recidivist offending**
- **lack of enforcement**
- **governance issues**

The associations between traders and premises in Linxia indicates that criminal networks are involved in the skin trade





This chart illustrates the value of compiling and analysing historical information to inform future operational activities, and demonstrates how in the absence of targeted enforcement measures, illegal activity can persist.

With leopard and snow leopard skins, the trade was far more overt than with tigers – no more so than in Linxia in Gansu Province, where EIA was directed by local contacts. During the course of two days, EIA investigators visited more than 80 shops in the same street, documenting an estimated 160 leopard and 60 snow leopard skins openly for sale. Retailers claimed that because of their minority (Hui) status, they had special dispensation to trade in Appendix I Asian big cat skins, some domestic, some from India.

The EIA/WPSI findings were immediately relayed in person to Chinese forestry, police and Customs officials at the CITES Enforcement Seminar in Urumqi, Xinjiang Province. The CITES Secretariat and officials from neighbouring countries were present. The scale of the trade shocked government participants, especially those who thought the 2003 Sangsang seizure had broken the back of the trade and that targeted consumer outreach campaigns were having an effect.

In January 2006, the Dalai Lama appealed to all Tibetans to stop using endangered Asian big cat skins. Across

the Tibetan plateau, people burned skins and it became socially unacceptable to sell skins and skin chupa in the markets of Lhasa, TAR, and Litang, Sichuan Province. When EIA and WPSI returned to the horse festivals in 2006, there was a significant decline in the number of people wearing skins. By 2007, not a single person was wearing skin-decorated chupa in Litang.

However, at the Nagchu horse festival in TAR some skin use has continued, and as recently as 2009 EIA documented the continued use and sale of 10 tiger and 27 leopard skin chupas. According to tailors selling skin chupa in Nagchu town market, Tibetans employed by the government are expected to wear skin-decorated chupa. This coercion to wear chupa decorated with skins echoes independent news reports of provincial authorities in Qinghai ordering festival-goers and local TV presenters to wear skins.^{16a,16b}

Demand today

Although appeals by religious leaders and targeted outreach campaigns have reduced demand from the Tibetan community, without law enforcement operations targeting the criminals profiting from the trade, trafficking in Asian big cat skins and parts into China has continued via the same routes. Despite the long history of trafficking and trade of Asian big cat parts in the western part of the country, there does not appear to have been any further enforcement action there since Sangsang in 2003.

Importantly, there has been a clear shift in favour of meeting the demand for skins to be used as home décor, taxidermy and for bribery. Many skins are now sold with the head and paws intact, or backed onto cloth for display.¹⁷ According to traders selling skins in 2007–09, the primary buyers have also changed and are principally the mainland Chinese business elite, officials and the military. Investigations in 2009 revealed that tiger and leopard bones continue to flow into a network of dealers selling to mainland Chinese for medicinal purposes, with customers apparently purchasing the raw, authentic item over patented packaged products.

BELOW:

From 2005 to 2009, EIA and WPSI investigators documented 20 whole tiger skins, 334 whole leopard skins, 97 whole snow leopard skins, a minimum of 62 chupa decorated with tiger and a minimum of 154 with leopard. In addition to these, bone, teeth and 7 big cat rugs were recorded.



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THE NATURE OF THE TRADE

While there have been seizures of Asian big cat parts and a decline in overt sales in China, the trade remains characterised by persistent offenders. In 2009, EIA encountered traders in Lhasa and Linxia whom we have documented in operation since 2005. Poor local law enforcement and their connections to corrupt local officials have ensured their continued operations.

Previous reports on the trans-Himalayan trade between 2004 and 2009 describe the trafficking routes, many of which were in use in the 1980s and 1990s, indicating significant trans-boundary enforcement gaps.

The consumer, or retail, level of business provides a relatively easy entry point to initiate covert operations that reveal more about the trade and criminal networks. Basic profiling of typical traders has enabled EIA to undertake investigations in areas not previously visited and almost immediately locate potential investigation targets. In all cases, by enquiring about the availability of tiger or other Asian big cat parts - including the tiger bone trade, previously considered to be impenetrable - investigators have been shown specimens for sale and obtained valuable information about the nature of the trade plus nominal information on the criminals involved.

This includes information on the trafficking routes, methods of concealment, how business is conducted with counterparts across borders, and the various government departments implicated by traders as corrupt.

All this demonstrates it is possible to generate a vast amount of information to target the tiger traders, but it is simply not being done on a proactive basis by national law enforcement professionals. Until this gap is closed, through official, long-term covert operations and greater investment in intelligence-led enforcement, the transnational criminal networks will continue to exploit the weaknesses in the system, and tigers and other Asian big cats will be pursued for their body parts.

CRIMINAL CONTEXT

There are subtle differences in the terms often used by law enforcement professionals that are less familiar to those decision-makers governing tiger and forest management, which can be a basis for confusion and a lack of appropriate action.

1) ORGANISED CRIME

It is broadly recognised that wildlife crime, certainly in the case of tigers, has become more sophisticated and organised. The UN describes organised crime as referring to the actions of a group of people (three or more^{18,19}) collaborating to repeatedly commit crime defined as serious, for financial or other material benefit.

The CITES Secretariat's indicators of organised wildlife crime are:

- Organised structure to poaching, utilising gangs and supplying vehicles, weapons and ammunition
- Exploitation of local communities
- Provision of high-quality lawyers
- Corruption of judicial process and enforcement personnel
- Violence towards law enforcement personnel
- Exploitation of civil unrest
- Financial investment in 'start-up' and technology for processing and marketing
- 'Inviolability' displayed by those involved
- Sophistication of smuggling techniques and routes
- Use of 'mules' or couriers²⁰

2) INFORMATION AND INTELLIGENCE

Information can be publicly available or privileged (meaning sensitive or secret), such as telephone records, arrest histories, or the number of crimes in a particular location during a specified period. There is a wealth of information available, but it is when it is processed, integrated and analysed that it becomes really useful. Transformed into **intelligence** it offers a far more informative picture that can be used to direct further enforcement actions.

It is not just the processing of information that is important. There is a lot of general information available on seizure incidents for example, but more specific information is required surrounding the individuals involved; telephone and business records, passport and travel details. Processing this higher level of **information** into **intelligence** would enhance enforcement efforts.

3) CRIMINAL ORGANISATIONS

Trafficking in tiger parts is a form of serious organised crime²¹ perpetrated by a network of individuals and organised criminal groups rather than "organisations" which are traditionally seen within crime circles as familial groups such as crime families (mafia).²²

The United Nations Office on Drugs and Crime states that, "The traditional hierarchical forms of organised crime groups have diminished; replaced with loose networks who work together in order to exploit new market opportunities."²³ The failure to understand the nature of these "loose networks", and acknowledge the adaptability and resourcefulness of individuals within criminal networks is one that has and continues to frustrate wildlife crime enforcement activity.²⁴



© Mike McWilliam / EIA

KEY ENFORCEMENT RECOMMENDATIONS 1993-2010

ABOVE:
Forest guards on patrol in India. Strong on-the-ground protection must be backed up with efforts to reduce demand and tackle the international trade.

After conducting a review of Tiger Range Country National Action Plans, strategies for tiger conservation and CITES resolutions and decisions since 1993, EIA has identified the key enforcement solutions most consistently raised and committed to during the past 17 years. Based on its experience, EIA believes implementation of these actions remains critically important to the conservation of wild tigers:

- 1) Intelligence-led enforcement, consisting of;
 - Intelligence sharing
 - Regional cooperation and networks
 - Domestic multi-agency enforcement units / operations;
- 2) Legislative and judicial reform;
- 3) Demand reduction.

INTELLIGENCE-LED ENFORCEMENT

Intelligence-led enforcement is a management tool intended to maximise limited resources towards where they will have most impact. Instead of making isolated seizures or attempting to police long and porous borders, intelligence-led policing draws on investigation, profiling, informants and targeted action to break up criminal networks. It is focused towards specific

tasks and is reactive to changes in circumstance. As such, it is particularly appropriate to combating wildlife crime, where the random interceptions of goods in transit only leads to the arrest of couriers. Without follow-up investigations and prosecutions, this simply removes the desired commodity from the consumer, but is not effective in striking at the heart of the trade and those who control it. The tragedy is that as with other forms of crime, the criminal networks simply source new supplies, but unlike arms and narcotics, tigers are a finite resource.

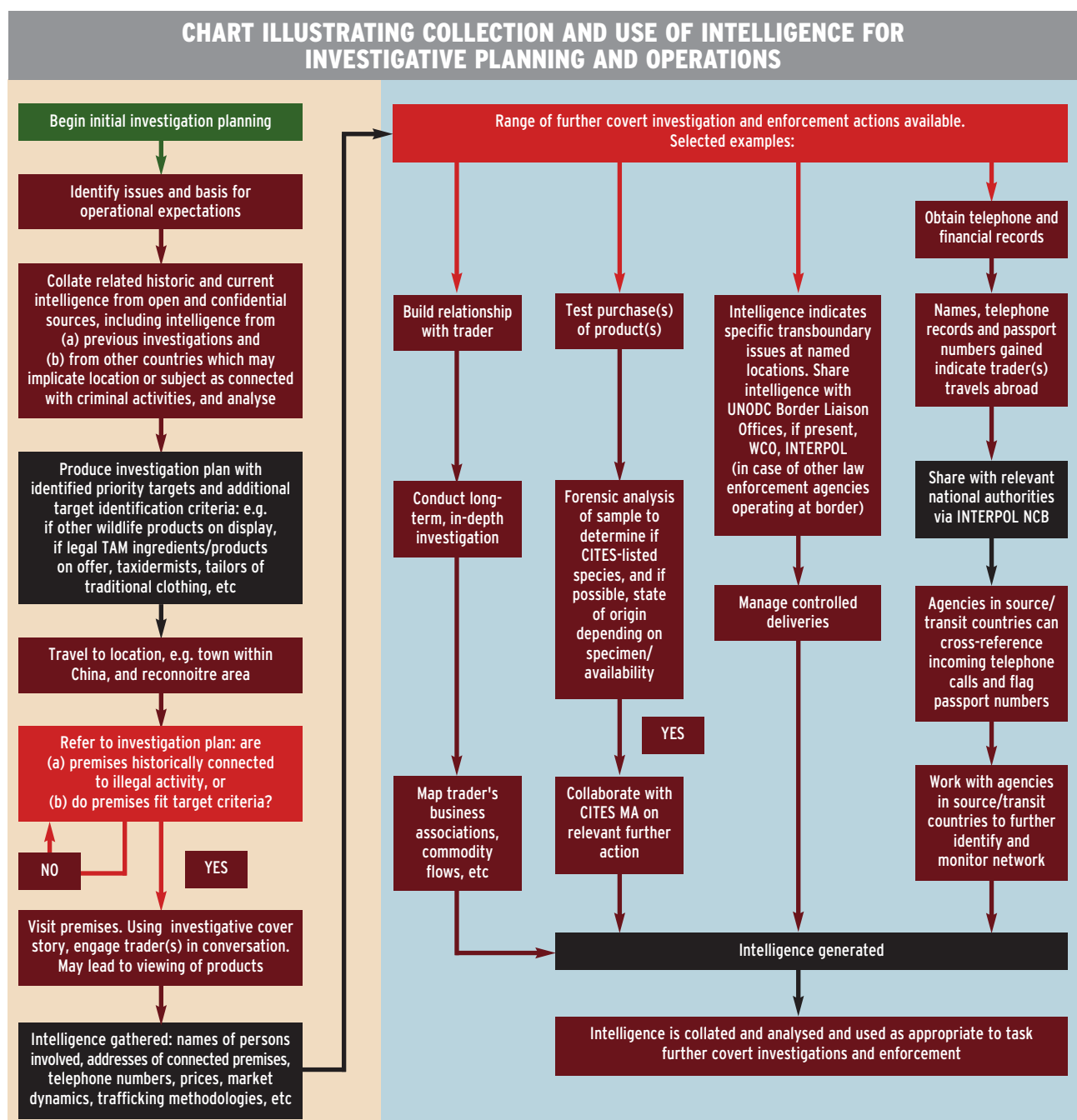
The importance of intelligence-led enforcement to combat the Asian big cat trade has long been recognised: it was referenced specifically in 1999 by the CITES Tiger Technical Mission team; and in 2002, CITES Res. Conf. 12.5 recommended intelligence be shared between enforcement agencies and further provided guidance on reporting and intelligence analysis. The need to embed this professional enforcement approach is one reason the CITES Secretariat first recommended the convening of high-ranking police and Customs officials to address tiger conservation in 2006.²⁵ Four years on, finally recognising it is essential, the CITES Parties agreed such a meeting should take place although no date has yet been set (see CITES Decision 15.48).

In April 2009, at a meeting of ASEAN countries in Pattaya, governments agreed a Manifesto on Combating Wildlife Crime in Asia, again pledging to implement intelligence-led enforcement, effective patrolling and anti-poaching activities. At the October 2009 Kathmandu Global Tiger Workshop, government delegations reaffirmed their commitment to implementing the Pattaya Manifesto and CITES Resolution 12.5.

In their National Tiger Recovery Priorities (NTRPs), TRCs recognise the need for intelligence-led action. A major test of the success of the GTRP will be the speed and efficiency with which

TRCs mount intelligence-led operations in both forest and urban areas.

Frustratingly, there is a wealth of valuable intelligence potentially available to law enforcement agencies and the flow chart below illustrates the type and level of information which can be obtained by NGOs, and indicates how much more could be achieved if professional law enforcement agencies were tasked with conducting long-term covert investigations, controlled deliveries and generating actionable intelligence on a regular and proactive basis. It is critical that efforts in this direction are massively accelerated with considerably more resources than have been allocated to date.



**ABOVE:**

The alarm over the increasingly organised and sophisticated tiger trade was raised ten years ago with information surrounding the massive seizure of bones and skins in Khaga, India.

Intelligence sharing

As far back as 1994, CITES was urging Parties to strengthen communications to combat the tiger trade, a call repeated ever since.²⁶

While the CITES Secretariat itself provides a mechanism for sharing information between CITES Management Authorities (MA), in 1996 CITES signed a Memorandum of Understanding (MoU) with the World Customs Organisations to facilitate cooperation in the exchange of information. In 1998, CITES signed an MoU with INTERPOL to better engage police agencies in exchanging wildlife crime information.

Despite existing channels for intelligence-sharing, the CITES MAs of some TRCs indicated they either never share intelligence or do so with only one other country, once or twice a year. Some said that as far as they were aware, the mechanism for liaising with INTERPOL was new, and one CITES MA stated there was no 'law' for CITES to cooperate with INTERPOL.²⁷ Clearly, there remains a significant gap between the measures already in place and the willingness or ability of TRCs to use them. Without reviewing these issues, it seems unlikely significant progress can be made in this regard.

"The CITES Management Authorities in some TRCs indicated they either never share intelligence or do so with only one other country, once or twice a year."

Indeed, countries still appear reluctant to engage in intelligence exchange. Noting a lack of sufficient progress, the CITES Secretariat arranged a specialised training course focusing on intelligence issues for TRCs, held in Indonesia in December 2009. One outcome was an agreement that participating TRCs would provide intelligence on Asian big cat trade for analysis by INTERPOL by the end of February 2010. Only one country did so. A repeat call for such intelligence was endorsed by the 15th Conference of the Parties to CITES in March 2010, with a revised deadline of July 2010.²⁸ We look forward to hearing whether countries have indeed provided the kind of intelligence that can lead to the disruption of criminal networks.

The situation could be improved through the establishment of INTERPOL 'wildlife crime desks', embedded within the NCBs of source, transit and consumer countries. This apparatus would build on existing enforcement mechanisms and the MoU with CITES. Professional investigators would represent communication and facilitation nodes between INTERPOL General Secretariat and national enforcement agencies.

Regional co-operation and networks

International cooperation is at the heart of the effectiveness of CITES, but in 1994, Parties felt compelled to press tiger range and consumer countries to improve communication and cooperation to end the tiger trade.²⁹

The International Symposium on Tigers in Delhi in 1993 agreed a mechanism for international cooperation was essential, and in 1994 the Global Tiger Forum was established and now comprises seven TRCs.

Since then, a number of formal bilateral and multilateral cooperation agreements have emerged to strengthen enforcement on wildlife crime through shared expertise and best practice (see Table 1).

Despite these existing mechanisms, intelligence-sharing has been inadequate but there is little evidence of any real assessment by governments as to why. The insistence that bilateral or multilateral agreements be signed in order to achieve cooperation gives cause for concern, implying that governments would rather operate in loose political agreements than answer to binding global treaties.

Domestic multi-agency enforcement units / operations

Following its assessments in 1999, the CITES Tiger Technical Mission Team suggested specialised enforcement units would overcome obstacles related to the implementation of intelligence-led strategies.³² CITES guidance

TABLE 1. Membership of existing intergovernmental agreements and agencies with a mandate to address illegal wildlife trade and organised, transnational crime¹

Tiger Range Country	CITES year ratified	INTERPOL membership	World Customs Organization	Global Tiger Forum	UN Convention on Transnational Organised Crime	Convention on Biological Diversity	UN Convention against Corruption	Bilateral	ASEAN-Wildlife Enforcement Network (WEN) / SA-WEN
Bangladesh	1981	1976	1978	Y	N	1994 (R)	2007 (a)		SA-WEN
Bhutan	2002	2005	2002	Y	N	1995 (R)	2005 (S)		SA-WEN
Cambodia	1997	1956	2001	Y	2005 (R)	1995 (a)	2007 (a)	MOU with Vietnam: on illegal wildlife trade ²	ASEAN-WEN
China	1981	Rejoined 1984	1983		2003 (R)	1993 (R)	2006 (R)	Protocol with India: Tiger conservation (1995), MOU with Nepal on biodiversity (2010); ³⁰ Protocol with Russian Federation on Tiger Protection	
India	1976	1949	1971	Y	2002 (S)	1994 (R)	2005 (S)	MOU with Nepal: illegal wildlife trade (2010) ³¹	SA-WEN
Indonesia	1978 (a)	1952	1957		2009 (R)	1994 (R)	2006 (R)		ASEAN-WEN
Lao PDR	2004 (a)	1957	2007		2003 (a)	1996 (a)	2009 (R)		ASEAN-WEN
Malaysia	1977 (a)	1961	1964		2004 (R)	1994 (R)	2008 (R)		ASEAN-WEN
Myanmar	1997	1954	1991	Y	2004 (a)	1994 (R)	2005 (S)		ASEAN-WEN
Nepal	1975	1967	1986	Y	2002 (S)	1993 (R)	2003 (S)	See above	SA-WEN
Russian Federation	1992	1990	1991		2004 (R)	1995 (R)	2006 (R)	See above	
Thailand	1983	1951	1972		2000 (S)	2004 (R)	2003 (S)		ASEAN-WEN
Vietnam	1994 (a)	Rejoined 1991	1993	Y	2000 (S)	1994 (R)	2009 (R)	See above	ASEAN-WEN

¹ Non-annotated dates refer to year of ratification. Suffixes refer to: (S) - year signed; (R) - year ratified; (a) - year accession

² CoP15 Inf. 7 exact date of action not stated

recommends that specialised enforcement units are multi-agency, comprising personnel from national agencies regularly engaged with wildlife crime enforcement, including police, Customs, forest and wildlife departments.³³ EIA believes that these units are an essential tool in combating wildlife crime.

Multi-agency units are an appropriate enforcement response to a range of overlapping criminal activities traditionally tackled by separate departments. In reality, criminal transgressions are not usually limited to a single act – aside from investigating the core crime, there may be opportunities for investigation and prosecution on financial, conspiracy, immigration or other grounds.

Core functions should include gathering of intelligence – including through analysis of historical cases; cultivation of informants and open source information; analysis of intelligence and dissemination through a routine exchange with INTERPOL via the National Central Bureaus; covert investigations to generate actionable intelligence leading

to arrests and convictions; participation in coordinated international operations to disrupt transnational networks.

A specialised multi-agency enforcement unit presents several additional advantages by pooling skills, knowledge and resources – especially access to informant networks and other intelligence sources otherwise exclusive to individual agencies. The issues become shared and are not isolated as ‘someone else’s jurisdiction’. Finally, as CITES has commented, the collaboration of personnel from a variety of agencies can be an effective measure against corrupt practices.³⁴

India was the first Tiger Range Country to establish a full-time, operational, multi-agency unit, the Wildlife Crime Control Bureau (WCCB) which came into existence in 2005, and was fully activated in 2007. Malaysia, Thailand, Vietnam, Cambodia, Lao PDR, Nepal, China Indonesia and Bangladesh all have, or are planning to set up, a dedicated body to combat wildlife crime, in the form of networks, task forces, committees or multi-agency units.^{35,36}

Some range states have instead proposed to strengthen existing individual institutional capacity or synthesize aspects of operations between existing individual enforcement agencies (including short-term interagency operations),³⁷ sometimes by giving a coordinating role to an existing unit.³⁸ However, some CITES MAs still cite a lack of full-time multi-agency units as a barrier to effective CITES enforcement.³⁹ EIA encourages all TRCs to move towards establishing full-time, multi-agency units with the operational capacity and resources to perform the core functions listed above.

Equally, multi-agency enforcement at an international level is of critical importance. The CITES Secretariat, INTERPOL, the UN Office on Drugs and Crime, the World Customs Organisation, along with support from the money-laundering and asset-recovery divisions of the World Bank have launched the International Consortium for Combating Wildlife Crime (ICWC). This will provide a collaborative framework to support national enforcement efforts, assisting with intelligence sharing, enforcement cooperation and international interdictions, needs assessments, best practice exchange and capacity building.

BELOW:

Wildlife crime enforcement must become more sophisticated, and pool the skills and resources of frontline protection officers with police, Customs and intelligence officers in full-time, operational multi-agency enforcement units.



© Debbie Banks / EIA



© Mike McWilliam / EIA

ICCWC – AN INTERNATIONAL RESPONSE TO WILDLIFE CRIME

Working together, the partners in the International Consortium to Combat Wildlife Crime can pool skills and resources, operating through their national parent agencies to raise wildlife crime enforcement to a professional and consistent standard across the tiger range and consumer countries.

UN Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)⁴³

- CITES is a Multilateral Environmental Agreement (MEA) to which all TRCs are parties which aims to protect wild species against over-exploitation from international trade
- The CITES Secretariat's Enforcement Assistance Unit supports enforcement measures through liaison and information exchange with national, regional and international law enforcement agencies
- Provides capacity building, training and reference materials
- Convenes specialist CITES Enforcement Task Forces, including the Tiger Enforcement Task Force, and the CITES Enforcement Expert Working Group

INTERPOL

- International police organisation with a National Central Bureau in 188 member countries
- Unique, secure communications system I-24/7 for sharing sensitive information on criminals
- Recent examples include *Operation Infra-Red*, which led to the arrest of more than 100 known and suspected international criminals throughout 29 countries in just three months.⁴⁰ INTERPOL's Environmental Crime Programme recently coordinated *Operation Tigre*, which led to the arrest of 25 individuals in six participating TRCs⁴¹
- Searchable databases, including one holding data on more than 175,000 known criminals, allows for cross-checking information on wildlife criminals against other forms of crime⁴²
- No language or diplomatic barriers to communication and cooperation

United Nations Office on Drugs and Crime (UNODC)⁴⁶

- The UNODC assists over 145 countries with the implementation of the UN Convention against Corruption and the UN Convention on Transnational Organised Crime
- Strengthens integrity and capacity of governments, judiciary and enforcement agencies, including through needs assessment and exchange of best practice and has produced a wildlife crime assessment toolkit
- Creation of Border Liaison Offices for joint-border patrolling

World Customs Organisation (WCO)^{44,45}

- The WCO's Customs Enforcement Network supports Customs administrations in 150 countries by providing a database of non-nominal Customs seizures and offences for trends analysis, a website for alerts, a concealment picture database and a communications network between Customs officers
- WCO's Environet is a specific communications tool on environmental crime
- Through the Green Customs Initiative and UNODC Container Control Programme, the WCO contributes to capacity building and training

World Bank Stolen Asset Recovery Initiative (StAR)^{47,48}

- In partnership with the UNODC, the World Bank's StAR addresses the flow of the proceeds from criminal activity, corruption and tax evasion, estimated at between \$1 trillion and \$1.6 trillion
- Provides technical assistance and builds capacity into investigations and legal action to detect and prevent the financial aspects of wildlife crime

LEGISLATIVE AND JUDICIAL REFORM

It's long been recognised that problems with the judicial process have blighted tiger conservation. In 1994, CITES resolution 9.13 urged Parties to adopt comprehensive legislation and enforcement controls to eliminate trade in tiger parts and derivatives, and to impose penalties adequate to deterring the trade.⁴⁹

Specialised courts and more strict penalties have been introduced over the years by TRCs, but a mixed bag of low detection rates, poor conviction rates, and bureaucratic failings across the tiger's range means that these efforts still offer little deterrent.

In recent months, the Manifesto on Combating Wildlife Crime in Asia made a commitment to 'identifying, investigating and prosecuting significant cases, obtaining significant terms of imprisonment and fines, and seizing and forfeiting the proceeds and tools of the criminal activities.'

A low conviction rate is widely associated with environmental crime. Whilst there have recently been some high-profile convictions in India,⁵⁰ data from the Wildlife Protection Society of India indicates that during 2000–09, 882 people were accused in tiger cases, including poaching and the seizure of body parts.

Of these, only 18 were convicted – a rate of just two per cent.⁵¹

Although some TRCs have high conviction rates for other forms of crime, this is countered by the perception among illegal wildlife traders that they have little to fear about detection or prosecution; in one TRC, there has been only one conviction in the past 12 years.⁵² In some cases, the penalties applied are weak; elsewhere, perpetrators are allowed to retain illegal property if a fine is paid. And even if wildlife criminals are imprisoned, in some TRCs they are often released early.⁵³

The reasons for the low conviction rate are complex. The effective investigation, prosecution and sentencing of criminals can be disrupted by barriers embedded in both pre-judicial and judicial procedures. In 1999, the CITES Tiger Technical Missions highlighted considerable delays in judicial process, citing a lack of training and awareness, confusion over jurisdiction and a lack of legislative and technical knowledge.⁵⁴

Cases may fall apart due to technical errors by those filing them; in some range states, they can be 'lost' altogether due to bureaucracy or alleged corruption.⁵⁵ The Tiger Technical Missions also felt there was 'considerable scope' for raising awareness among the judiciary of wildlife crime issues,⁵⁶ something NGOs, UNEP⁵⁷ and regional networks such as ASEAN-WEN have attempted to address.⁵⁸

Another key recommendation of the Tiger Technical Missions team was to establish special wildlife crime courts.⁵⁹ By 2009, specialised environmental courts and tribunals had been set up in some TRCs in Malaysia, Indonesia, India, Bangladesh, China and Thailand.⁶⁰

Malaysia, India and Russia have all recently indicated their intention to strengthen legislative and prosecutorial processes and to better evaluate their effectiveness to combat tiger trade.^{61,62,63,64,65}

Again, while recent developments are welcome, EIA notes it has been 16 years since CITES first called for improvement in this area. The wheels of government may turn slowly, but this is still an excessive delay. There will need to be continual commitment to achieve real and long-lasting change.

BELOW:

This pile of leopard skins was being displayed quite openly in 2005. Laws must be enforced to make a prohibition effective.



© Belinda Wright / WPSI / EIA



DEMAND REDUCTION

Demand reduction is crucial to complement enforcement efforts in the battle against the tiger trade. If the consumer end is not tackled, it will be almost impossible to deal with supply. In 1999, six years after China's ban on tiger bone medicines, the CITES Technical Mission report expressed concern about the country's level of consumer demand. In 2000, CITES called on Parties to eliminate demand for tiger products from Traditional Asian Medicine, and many groups have worked with the Asian medicine community to develop alternatives and spread awareness of the need to end the use of tiger parts. This appears to have been successful in significantly reducing the availability of packaged and patented medicines claiming to contain tiger.^{66a}

As noted in the section 'Changing dynamics of the tiger trade', there have been other successes in reducing consumer demand through targeted and specialised outreach campaigns. However, demand reduction strategies require constant sensitivity to market changes, such as the new market for skins as luxury items.

Bone is increasingly used in tiger bone wine, marketed as a gift or "tonic", with large volumes advertised openly at wildlife parks and tiger breeding centres. Vietnam has emerged as a major consumer of tiger bone

manufactured into a medicinal "glue" and recent reports suggest that many of the tiger parts in trade in Vietnam have come from captive sources^{66b}. The presence of so many captive-bred tigers has been recognised as a threat to the wild tiger by the Parties to CITES (Decision 14.69). So too has the existence of stockpiles of tiger parts, both from pre-convention stocks and from seizures. Consolidating and destroying these parts would send a powerful message of TRCs' commitments to maintaining the ban on tiger trade. In fact resolutions under CITES calling for the destruction of stocks date back to 2002 (Res. Conf. 12.5), while those calling for the adequate control of such stocks date back farther still.

To respond to these shifting demands, ongoing and responsive reduction strategies are required. There is little point in targeting potential consumers of tiger bone medicines in Hong Kong or Shanghai if the primary demand is for skins for taxidermy or interior décor. Similarly, as the Tibetan market has declined, new attention must be placed on educating the Hui traders who control much of the trade, and the Han Chinese consumers who have emerged as the main consumers of skins and bones. Only by responding to such shifting dynamics, supported by clear policies to discourage use, can demand be reduced.



© Faith Doherty

TOP:

The availability of products from captive-bred tigers - such as this tiger bone wine on sale near Beijing - stimulates demand for wild tiger products and confuses efforts to enforce regulations.

ABOVE:

The CITES Secretariat has indicated that tiger parts may be leaking into the illegal market from captive breeding centres in a number of TRCs.



© Dave Currey / EIA

OBSTACLES TO ENFORCEMENT PROGRESS

If the aspirations and commitments being made prior to the International Tiger Forum are to be turned into action, then TRCs, donors and the wider international community must ask why it is still so difficult for governments to launch intelligence-led enforcement strategies, why criminal intelligence is still not shared despite the mechanism to do so, and why the skills of agencies specialising in crime and enforcement has not been better integrated into wildlife crime enforcement.

This might be understandable if the recommendations regarding key enforcement measures were only a few years old, but many date back 10 or 15 years. Notwithstanding recent reinvigorated efforts to sign new cooperation agreements and create multi-agency enforcement units, progress has been appallingly slow. The tiger does not have time to endure such a continued lack of political will.

If the discussions at the International Tiger Forum are to change the situation, it is necessary to look more deeply at the reasons behind the failure of some previous initiatives.

Symptomatic of weak political will are underlying themes such as a lack of understanding or capacity, a lack of resources, cooperation, motivation, compounded by corruption and institutional weaknesses.

LACK OF UNDERSTANDING AND CAPACITY, AND UNCLEAR POLICIES

It is clear there is a significant lack of understanding in the tiger conservation and wildlife management community about the nature of the trade and requirements of enforcement, as well as what is meant by fundamental terms such as intelligence and information, and the role of key agencies. This is a serious barrier.

For example, as recently as CITES CoP15, it was apparent that many Parties claimed they could not exchange intelligence until court cases were completed. While safeguards to minimise interference in the due process of investigation should always be applied, international and multi-agency intelligence sharing does take place – for terrorism or counterfeit goods – and can actually facilitate wider investigations.

Only INTERPOL has the robust infrastructure enabling the secure transmission of nominal intelligence, without language barriers.⁶⁷

Lack of understanding is also a key obstruction to reducing demand for tiger parts, evident from the absence of targeted outreach campaigns and institutional messaging to address the current buyers of tiger and other Asian big cat skins and meat and the growing production and demand for tiger bone wine. Doubtless these markets are in

BELOW:

Despite many years of agreements on how to improve enforcement, the parts of tigers and other Asian big cats are still being traded – in some cases in full view of passers by, such as here in Linxia, Gansu Province of China in 2008.



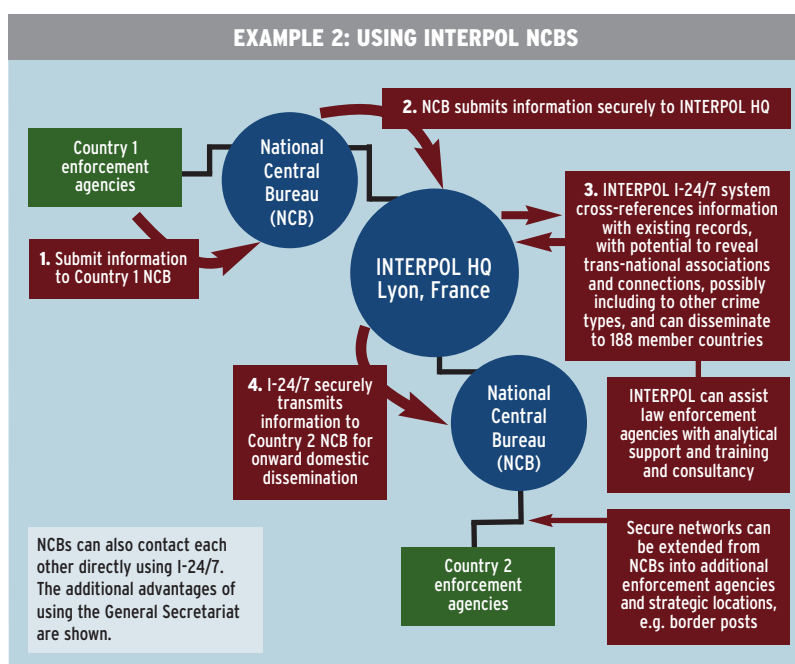
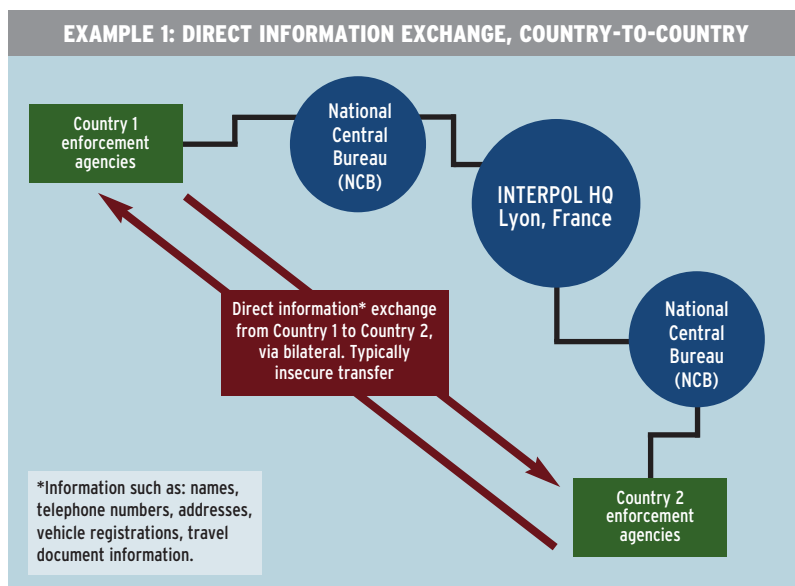
constant flux and so need close attention to be successfully targeted. Equally, poor comprehension of law and conservation policy, or unclear policy messages, will confuse localised enforcement efforts; Chinese wildlife parks openly selling tiger bone wine have on more than one occasion claimed to do so with local government permission. Further complicating the situation in China, and making policing the ban on tiger products particularly difficult, is the creation of a scheme announced in a State Forestry Administration Notification No. 2006 (2007), to register, label and allow the sale of tiger and leopard skins from 'legal sources', apparently without a rigorous mechanism for evaluating legality; also, the granting of State Food and Drug Administration licenses to medicines listing Appendix I animals in the ingredients.⁶⁸

The decision-makers responsible for wildlife and forests are often not attuned to professional enforcement needs or approaches. For example, following NGO exposés of illegal trade in tiger parts in China, enforcement operations were publicly announced in advance, warning criminals and undermining the chances of obtaining valuable intelligence.⁶⁹ In some tiger range countries officials feel confident they are on top of the trade simply by making seizures, ignoring the need to make arrests and conduct investigations.

Improving understanding is partly to do with outreach and communications, but also with training. In the past 10 years, more than 33,000 forest, police, Customs, military and judiciary officials have been trained or sensitized in wildlife crime enforcement by NGOs across India, with the support of the government.⁷⁰ Several thousand more have been trained across China and South East Asia.^{70b,70c} While a valiant and important effort, it reaches only a fraction of those who need it. In India's self-declared State of the Tiger, Madhya Pradesh, alone, there are more than 40,000 state police and 20,000 forest staff.^{71,72}

Despite general acceptance of the need for a professional enforcement approach, very few TRCs have wildlife crime on the curricula at their police and Customs training academies.⁷³

This needs to change. The professional enforcement community must become



more effectively engaged, treating wildlife crime as a serious form of organised crime. Fully integrating wildlife crime into training programmes could play an important role in this process.

FIGURE 3
The advantages of using INTERPOL to share intelligence on wildlife criminals.

LACK OF RESOURCES

Tiger conservation is generally run on a shoestring and according to the Executive Summary of the Global Tiger Recovery Programme, all TRCs except India have identified significant shortfalls in their ideal budgets. Clearly, this affects the protection of tigers, with insufficient funds to fill anti-poaching vacancies, equipment, pay in relation to other government departments, training and forensic support.

"In India there are many poor people... and the laws are non-existent... I can select them [bones] when I'm there... over there it's like my own shop."

Perceptions of tiger bone trader in China, August 2009

Recent estimates by the Wildlife Conservation Society put the resources available to protect 'source' populations at \$5 per hectare, which drops to \$3.6 per hectare if India is excluded. This falls significantly below the estimated \$9 per hectare needed to adequately secure a population.⁷⁴

NGO spend has also been modest. According to the IUCN Cats Projects Database, NGOs spent just \$57 million on tiger conservation from 1998–2007, or less than \$6 million a year across the entire range.⁷⁵

Enforcement spending is somewhat harder to quantify because it frequently bridges different departmental budgets, but it is clearly recognised as an urgent need.⁷⁶ According to the IUCN database, NGO spend on enforcement was just over \$10 million from 1998–2007, or 18% of total spend.⁷⁷ However the vast

majority of these funds were targeted at in-country initiatives and enforcement around protected areas, with only about \$3.5 million over ten years channelled towards projects with an ex-situ, transboundary law enforcement component or the capacity to share intelligence and exchange information between government agencies.⁷⁸

Intergovernmental enforcement initiatives are similarly starved of funds. From the CITES Secretariat's total operational expenditure of \$4.4 million in 2008, only \$593,000 was available for enforcement and compliance. Given that CITES is required to operate across the entire range of regions and species, this figure is shockingly low, and while the Conference of Parties recently supported the need to double the staff working on enforcement, that is still only two people to address global wildlife crime issues. INTERPOL's Environmental Crime Programme would require less than \$800,000 per year to provide a service to its 188 members on wildlife and other environmental crime. ICCWC only requires \$4m over five years, while ASEAN-WEN operated on around \$7m over five years from US AID.

Protecting wild tigers while they still live is the priority, but there is a need to complement this with increased funding to tackle the demand-driven criminal networks. Despite cross-border cooperation and law enforcement being identified as an 'overwhelming priority', the National Tiger Recovery Priorities identified in the GTI process only call for 6.6% of the projected extra TRC funding requirements for the next five years to be spent on tackling illegal trade and demand reduction, of which 50% was requested by Vietnam alone.⁷⁹

Clearly, the situation needs to change. EIA endorses the objective of increasing funding for in-situ tiger conservation to \$9 per hectare, as outlined by the Wildlife Conservation Society. We also urge all TRCs to increase funding for ex-situ enforcement measures, including the assignment of officers from police and Customs to facilitate national and international multi-agency cooperation.

When discussing funding mechanisms, it is worth remembering the total external funding needs identified in the Global Tiger Recovery Program amount to \$350 million. This is a drop in the ocean for some TRCs, compared to expenditure on non-wildlife initiatives; it is estimated

BELOW:

Personnel risking their lives to save endangered species often live in poor conditions, contributing to low morale. There must be greater investment in resources, training and the social status of the frontline staff.



China spent \$31 billion on the Olympic Games in 2008,⁸⁰ while India spent a total of \$2.6 billion on the 2010 Commonwealth Games.⁸¹

COOPERATION AND TRUST

Poor communications, both internally and between TRCs, are a perennial obstacle to improving enforcement, particularly intelligence exchange and regional cooperation.

Inter-departmental rivalry and protective attitudes towards intelligence sources are long-standing reasons why there may be a lack of intelligence sharing within a country, hence the recommendations for multi-agency units. Lack of trust or understanding of mechanisms may also prevent international exchange.

The absence of national intelligence collation may be one reason why countries have not made use of the analytical and international coordination services provided by INTERPOL. While individual officers in TRCs may have wealth of knowledge and information around tiger trade, there does not appear to be a comprehensive national system for collating the breadth and scope of information that can be turned into valuable intelligence. A recent exercise by TRAFFIC confirms that within each TRC no single agency or focal point has all the information on seizures, nominal information, follow-up investigation reports, prosecutions and enforcement effort at their fingertips.

Language and political barriers are a flimsy excuse for not communicating with INTERPOL, since the agency recently had a role in coordinating international investigations between TRCs on issues such as money-laundering and illegal gambling.⁸² Some officers in TRCs are unsure as to why they should send their information to INTERPOL, and may feel that in so doing they lose ownership; that they are giving their information to an external entity. In fact, all TRCs pay a membership fee to INTERPOL through one of their national police agencies. As members they can make use of INTERPOL's secure communications, analysis and support service.

There is also a lack of trust within the NGO community, both internally and, frequently, in relations with TRC governments. Many range states are



hostile towards NGOs publishing 'bad news', while NGOs often compete for small funding streams and initiatives, creating divisions and obstacles.

There is no easy solution to overcoming issues of trust, but the first step must be an open and honest appraisal of the situation. Simply maintaining the line that 'all is well' does not benefit the tiger.

Bringing relevant agencies together round the table to foster good personal relations is critical and has led to demonstrable improvements in enforcement communication and cooperation elsewhere and is one of the reasons multi-agency units have been consistently promoted.

MOTIVATION, GOVERNANCE AND CORRUPTION

Everyone who has worked on the ground in tiger conservation will have encountered extraordinary individuals, for example forest officers and forest

ABOVE:

Illegal ivory for sale in full view of local law enforcement, Linxia, Gansu Province in 2008.

"In the forestry bureau ... we have a classmate in the forestry bureau. Before they conduct checks, they inform me beforehand."

Trader to EIA, 2008



ABOVE:
Tiger skin offered for sale
in 2009 in Lhasa, TAR.

guards who have demonstrated enormous courage, not only by risking their lives on the front line but also in withstanding the institutional weaknesses in the system of governance constantly undermining tiger conservation success. They will also be aware of the enormous challenges facing the sector.

Most forest personnel engaged in protected area and tiger management are low paid, understaffed, ill-equipped, uninsured, and sometimes living and working away from their families for long periods. Committed officers are often transferred if they challenge local political leaders, industrial interests, well-connected poachers or even upset a 'VIP'.

Low pay and difficult working conditions demoralise staff and can foster corruption. Forest officers may be open to bribery and involved in illegal activities, or at least turn a blind eye to them. Officers who may have joined the forest service to go into the commercial forestry sector may see wildlife management as a 'punishment posting'. The conduct of demoralised and disinterested personnel can sour relationships with other stakeholders through punishing whistleblowers inside and outside the system instead of openly addressing problems, withholding compensation from local communities for livestock predation;

diverting equipment and funds for personal gain; managing corrupt tender processes to favour cronies, and so on. Localised corruption could explain why there has reportedly only been one seizure of tiger skins in the TAR, Sichuan, Qinghai and Gansu Provinces of China since 2001, despite tiger trade in these areas being well-documented by EIA, WPSI and others from 2004 to 2009.

Motivation and incentives are not just factors affecting enforcement performance in and around forest areas. In urban and cross-border areas, where many of the main tiger part traders are based, effective enforcement depends on proactive police and Customs efforts.

Since 2004, EIA and WPSI have found clearly illegal products on sale in full view of law enforcement agencies.⁸³ EIA has heard first-hand from traders at a key market in Linxia, Gansu Province of China, how they are tipped off by friends in the local forest department before an inspection, especially when authorities are visiting from outside the province.⁸⁴ Another trader in the same town said enforcement is unlikely when local officials in the State Administration for Industry and Commerce are the recipients of skins presented as 'gifts', or non-financial bribes.

In response to allegations of the illegal manufacture and sale of tiger bone wine in association with tiger farms, authorities have merely accepted claims from the owners that products are derived from lion not tiger, with no forensic investigation whatsoever. While quick to repudiate independent DNA tests on tiger meat, also recovered from tiger farms, authorities have failed to conduct their own investigations.

Similarly, in Lhasa and Shigatse, in TAR, traders have talked about their relationship with Customs and post office officials as the means to ensure safe passage of tiger and other Asian big cat parts.

Such corruption is a problem in all societies, but according to Transparency International most TRCs rank relatively poorly in the Corruption Perceptions Index.⁸⁵ Unless corruption is curbed, traditional deterrents such as the toughening of legislation may inadvertently promote corruption.⁸⁶ Criminals will simply raise their game, such as paying higher bribes, to offset the elevated threat of arrest or prosecution, especially where governance is weak.⁸⁷

TRCs recognize the need to tackle corruption and develop mechanisms to address it. In 2005, Vietnam passed a law on anti-corruption, while Cambodia (described as having a culture of corruption that permeates most aspects

of everyday life,^{88,89}) passed a much delayed anti-corruption bill in 2010.⁹⁰ Indonesia has set up an anti-corruption agency (KRP) and national ombudsman,⁹¹ while Nepal has a national audit institution.⁹² China has made good efforts in this department with a National Bureau of Corruption Prevention and a new ethics code.⁹³ So far however the emphasis in TRCs has been on combating corruption in other sectors of society, not in wildlife or environmental crime (although India's Comptroller and Auditor General has audited protected area enforcement). Clearly, while progress is being made, it is crucial that anti-corruption instruments are used to their full in tackling the tiger trade, beginning with a recognition of the role corruption plays in conservation. It remains to be seen if there is sufficient political will to making this a reality.

In wildlife crime specifically, corruption may be tackled by elevating the status and prestige of the departments responsible for protection and law enforcement to reflect their true value. Salaries, resources and training must also reflect this, while mechanisms to secure the engagement of other stakeholders to ensure transparency are also required. At the same time, corruption in wildlife crime law enforcement needs to be taken more seriously, and make it onto the agenda of high level anti-corruption instruments.

"We have worked very hard to bring here. We have paid tax twice in India, Nepal and then in China. It also includes bribe."

Tiger skin trader to EIA, 2005



© www.tigersintheforest.com

CONCLUSION

Achieving the goal of substantially increasing, or even doubling, the number of wild tigers by 2022 will require sincere political commitment from the very highest levels of government. World leaders must not only acknowledge the importance of saving the wild tiger, but ensure all relevant departments governing police, Customs, agriculture, development, industry and foreign affairs, as well as the environment and forest Ministries, are fully engaged. This widening of scope is absolutely crucial if the tiger is not to suffer from the inevitable conflicts that arise between departments charged with different priorities. Tiger Range Country efforts and global initiatives must also be supported with greater investment from the international donor community.

EIA remains of the view that there is so much more that governments could do to end all trade, in all parts and derivatives of tigers, from all sources, if they genuinely wished to. Achieving this will require an honest appraisal of why existing strategies have not yet been implemented, followed by the integration of policies across government departments to place the tiger and the world it symbolises higher up the political agenda.

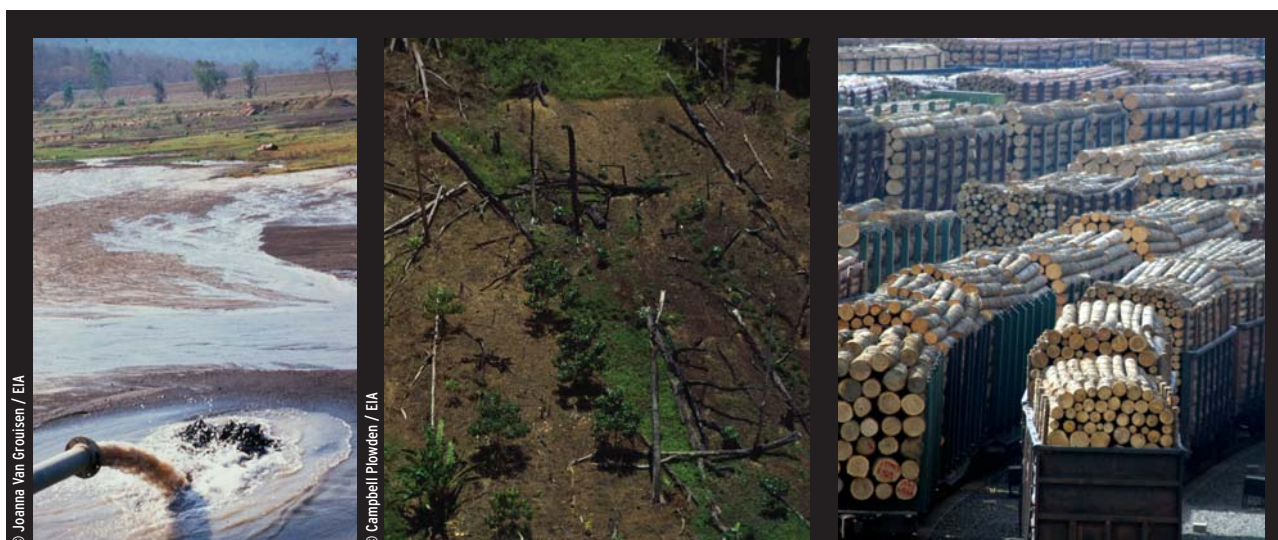
While some changes will take time, there are nonetheless immediate actions that could be taken to demonstrate renewed commitment now, as well as longer-term actions that can be set in motion. On the following page we identify actions EIA believes will indicate that governments are taking steps to seriously combat the tiger trade.

**BELOW:
(LEFT TO RIGHT)**

Mining and other industrial interests threaten tiger landscapes in India.

Forest clearance in Indonesia continues to reduce tiger habitat.

Logs from Russia awaiting transportation at the Russo-Chinese border.



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HABITAT LOSS

While this document has focused heavily on trade and enforcement, the underlying causes impeding effective action against the illegal tiger trade also threaten the viability of other strategies to save the wild tiger. Habitat loss is a good example. Lack of understanding over the value of tiger conservation landscapes, coupled with corruption and the lack of integrated government policy mean the Ministries established to defend the tigers' forests are constantly being undermined by industrial efforts to log, clear, flood and dig up the land.

In the weeks running up to the International Tiger Forum there have been disturbing reports from a number of tiger range countries. In Myanmar there are accounts that protected tiger forests have been leased for private sugar cane and tapioca plantations.⁹⁴ In Indonesia, video footage has emerged of bulldozers illegally destroying areas of Sumatran rainforest.⁹⁵ In India, tiger conservation landscapes are under constant pressure to open up to coal and bauxite mining, as well as road building and other industrial infrastructure.⁹⁶ Finally, in the Russian Far East, there are serious concerns that the provincial government will allow large-scale logging to take place in a crucial tiger habitat.⁹⁷ Without action to challenge these fundamental conflicts, the future for the big cats of Asia looks bleak.

The leaders of tiger range countries can change this. They have the opportunity to commit to aligning national stability, equitable growth and development with ensuring the protection of the tiger's rapidly dwindling kingdom.

RECOMMENDATIONS

Secure greater involvement of police and Customs officers in Asian big cat conservation

- As a sign that this is happening, TRCs can immediately assign appropriate officers to attend the high-level police and Customs meeting called for under CITES Decision 15.48;
- Place wildlife crime on the curricula of all law enforcement academies;

Reduce demand for tiger and other Asian big cat parts

With immediate effect, TRCs should:

- Issue a clear statement committing to an end to **all** trade in **all** parts and derivatives of tigers from **all** sources;
- Consolidate and destroy stockpiles of tiger parts and derivative; mount clear, up-to date and appropriate campaigns to deter consumers;
- Fully investigate suspected cases of illegal trade in parts from all sources;
- Fulfil CITES Decision 14.69 by phasing out tiger farming;
- Increase presence of messaging and inspectors at key border crossings;

Expand the use of intelligence-led enforcement in combating tiger trade

- TRCs should immediately convene roundtable discussions between INTERPOL NCBs and other relevant national enforcement agencies to develop national priorities;
- Work towards the establishment and proper support of multi-agency operational enforcement units;
- Mount targeted covert operations within 12 months in urban and cross-border areas;

Improve international cooperation to disrupt transnational criminal networks

- Provide resource support for the ICCWC initiative;
- Exchange actionable intelligence with other TRCs through the INTERPOL NCBs - effective immediately; supporting the Environmental Crime Programmes of INTERPOL and WCO;
- Support the establishment of INTERPOL wildlife crime desks in their country;

Continue with judicial reform

- Establish special courts for wildlife crimes if they do not yet exist;
- Support sensitisation of judiciary and prosecutors to the seriousness of tiger/wildlife crime;
- Implementation of a 'zero-tolerance' policy for criminals engaged in the trafficking of all Appendix I species, including no bail in cases involving suspected prolific wildlife criminals;
- Work with international community to carry out a comprehensive assessment of the criminal justice response to wildlife and forest crime in the TRCs;

Increase resources to combat wildlife crime

- Work with ICCWC to develop a full needs assessment for enforcement in TRCs as a matter of urgency;
- Donor agencies and TRCs recognise and link wildlife crime enforcement with sustainable development and to increase budget lines for enforcement;
- Donors and TRCs increase resources available for both ex-situ law and in-situ law enforcement needs identified in GTRP;
- TRCs to develop community-led conservation projects; explore innovative funding mechanisms including payment for ecosystem services;

Improve the motivation of enforcement staff

- TRCs to raise the profile of wildlife crime and enforcement;
- TRCs conduct a needs assessment for frontline forest personnel;
- TRCs establish a national wildlife service or elevate the financial and social status of the existing forest / wildlife services;

Tackle corruption in wildlife crime

- TRCs to apply anti-corruption legislation in wildlife crime;
- Ensure sufficient funds are available for national audit and anti-corruption bodies; encourage private-public partnerships around Protected Areas to ensure there are independent 'eyes and ears' in the field;
- Use existing anti-corruption expertise and resources, such as INTERPOL's best practice and global standards, to combat police corruption, or the resources of ABD/OECD Anti-Corruption Initiative for Asia and the Pacific, and support internal anti-corruption initiatives.



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