

# THE INSIDE STORY

## **Environmental criminals' perceptions** of crime, corruption and CITES



Environmental Investigation Agency (EIA)  
March 2013

The Environmental Investigation Agency (EIA) and partners conduct on the ground investigations engaging environmental crime offenders. Investigations document illegal trade, what facilitates it and the emerging trends, which is then presented to international decision-makers.

**Over the years, EIA's direct engagement with active environmental offenders has yielded rich insights** into their attitudes and perceptions: about what helps them do business and what deters them; the market trends and how these compare to previous years; how they perceive the criminal justice system; what they anticipate for their future business, and for the future of the species which they trade.

In source, transit and destination countries, individuals operating at different stages of the illegal trade chain describe similar dynamics: corruption (bribes and payoffs), weakly enforced legislation, the ability to exploit parallel legal markets and loopholes, even how domestic policies stimulate demand for protected species.

**As valuable as they are, offenders' perceptions are not currently being taken into account by all the** stakeholders in environmental crime. This is compounding a situation where environmental crime is not being fully or effectively addressed. Knowing how and what environmental criminals are thinking should not be the sole domain of non-governmental organisations (NGOs), undercover journalists, individual law enforcement officers or the communities living in areas where crime happens.

The Convention on International Trade in Endangered Species (CITES), with a membership of 178 Parties, seeks to regulate trade so it does not threaten species, but it does not exist in a vacuum.

**EIA's investigations have found environmental criminals are not ignorant about CITES, or about domestic legislation. A species' protected status or scarcity can mean that criminals 'bank on extinction', exploiting higher demand or higher financial 'value'.**

Country reporting to CITES on species-specific resolutions is inadequate. Governments may claim they have effectively deterred illegal trade, but provide little substantiating evidence.

Scoring systems rating national enforcement efforts tell an incomplete story if the information to measure success is only seizures, obscuring fewer prosecutions and a consistent absence of meaningful convictions.

Decision-makers can institute practices which value criminal thinking: practices where enforcement and crime prevention practitioners engage environmental offenders at both the pre- and post-conviction stages in instituted ways. This knowledge can feed into a range of actions towards the detection, disruption, prevention and ultimately, reduction of environmental crime. The international community too, including Parties to CITES, needs to take into account how those engaged in the legal and illegal trade react to international decisions, particularly when issues are kept on the table. Traders are paying attention to what happens next.



Elephant bull grazing on wet grassland, Lower Zambezi, Zambia.  
© Mary Rice / EIA



Two of the many: traders of different commodities engaged by EIA and partners.

LEFT: “This export is non-legal” - merbau timber smuggler Ricky Gunawan.  
© EIA/Telapak

RIGHT: Manager of CFC exporting company Hangzhou Sporlan, who described “very close relationships with Customs” and tip-offs about planned inspections.  
© EIA



## CRIMINAL PERCEPTIONS OF ENVIRONMENTAL CRIME

It is established practice to gather information about perceptions of ‘traditional’ crimes such as robbery or burglary. In the UK for example, police and local authorities invite communities to express their perceptions of crime, including fear of crime, through consultations, surveys or questionnaires.<sup>1</sup> A body of literature about public perceptions of crime (including those of victims of crime) helps to develop policies and crime prevention strategies.<sup>2</sup>

For environmental crime, these structures do not exist in formalised, wide-ranging ways. Environmental crime victims are broad, to name a few: species, communities, economies and national and international security. Demand-reduction research and campaigns seek to engage consumers of wildlife products, but this is challenged when the trade is covert, as has happened for tiger parts and rhino horn, or if Government policy itself stimulates demand. Furthermore, local communities affected by poaching and destruction of natural resources may not be surveyed for their perceptions of community-level losses.

If offenders feel scrutinised,<sup>3</sup> they can be deterred from committing crime. But when that scrutiny is absent, and when there is a lack of legal sanction – such as non-existence of laws or weak enforcement – deterrent-free crime remains a strong and irresistible magnet.

*‘Driven by perceptions of low risk and high profit, indications have emerged of environmental crime activities attracting the greater interest of organized crime groups.’<sup>4</sup>*

UNODC says that these organised crime groups are ‘often relying on failures in the criminal justice system’.<sup>5</sup>

With little to fear, offenders speak candidly. Environmental criminals offer a huge and currently unexploited source of information on motivation, methods, deterrents or lack thereof, and socio-economic conditions. Engaging them opens the way for many more interventions. To disrupt crime, it is important to know what criminals think.

## WHERE THE MARKET IS

In 2011, EIA's investigations into the illegal rosewood trade engaged a major trader who complained that the 'species is finished' and 'there are only about five years left in the trade.'<sup>6</sup> This was quoted in the subsequent proposal to list *Dalbergia cochinchinensis* on CITES Appendix II, submitted by Thailand and Vietnam for the 16<sup>th</sup> Conference of the Parties (CoP) to CITES<sup>7</sup> which, with additional evidence, makes the case for why the species should receive international protection.

An analysis of the effect of market speculation on wildlife decline, *Banking on Extinction* (2012)<sup>8</sup> quotes the following extract from The Economist (2002), which describes the perceptions of those trading scarce wildlife:

*'Market signals suggest that basking sharks do face a problem. Kuniaki Takahashi, a Japanese shark-fin trader, is so convinced that stocks are collapsing that a few years ago he cornered the market in Norwegian shark fins and stockpiled the result in Japan. He still seems confident that his stockpile will make him a fortune.'*<sup>9</sup>

Unlike surveys which seek to identify the demographics of wildlife product consumers, traders can give direct information about who is buying what and why.

EIA-Wildlife Protection Society of India (WPSI) investigations across the Tibetan plateau highlighted the use of endangered Asian big cat skins for traditional Tibetan clothing (chupa); but by 2006 this demand had collapsed.

Since the massive skins seizure at Sangsang (2003), there does not appear to have been enforcement action in the western part of the country.<sup>10</sup> Persistent traders remain and continue business: they just cater to a different market. Since 2007, demand has come from mainland Chinese military and business elites, who desire skins for luxury home décor, taxidermy and non-financial bribes. Bribes are another way corruption lends a hand to crime.



LEFT:  
Tiger skin for sale in Xining, Qinghai Province of China, 2009.  
The skin was backed on to red material with a full intact head and paws: clearly prepared for the home décor market.

**EIA's 2012 investigations in China have** documented a parallel legal domestic trade in the skins of captive bred tigers - for the same luxury home décor market.

## CORRUPTION, COLLUSION, CONNECTIONS

Corruption, collusion of authorities in crime, and political connections undermines the work of committed officers and often means business as usual for criminals – the most powerful among them rarely apprehended.<sup>11</sup>

The nature of corruption makes it difficult to assess, so Transparency International takes perceptions of corruption as the best available method.<sup>12</sup>

When criminals speak of environmental crime, corruption is woven into most scenarios they describe. Over the years, the trader quoted below has consistently referred to corruption, explaining here why he need not worry even if his products are seized:

*'Imprisonment – impossible... After they confiscate the items, we'll find the people inside, pay a bit ... and retrieve the items.'*

– Persistent trader of Asian big cat skins in Linxia, China, 2012

Corruption permeates every aspect of environmental crime investigated by EIA: permits are obtained illegally, criminals get tip-offs about planned checks and raids, 'errors' in evidence-gathering mean unsuccessful prosecutions, and local officials are themselves the buyers and recipients of wildlife products.<sup>13</sup> Under-resourcing of enforcement agencies, in terms of salaries, prestige and investment in skills, can compound these issues.

*'When it comes to smuggling ... they [traffickers] get notice ... some are very close to the people in Customs ... the stuff that has been seized, they buy it back from Customs ... Customs don't earn much ... so what do they want ... for example, if I were a Customs officer, if you pass by my area and I detain your goods, if I sell it off, it would be my personal gain ... I earn a bit and you earn as well ...'*

– Ivory trader in China, 2010

Even if legislation is tightened and enforcement does its job, the ability of criminals to corrupt the judicial process renders 'deterrents' such as imprisonment meaningless. This can only demotivate those working hard to ensure a successful prosecution.

*'I went inside [prison] but I came out ... I just have to pay money.'*

– Ivory dealer in Zambia, 2010

Yet if authorities investigating criminal activity detect enforcement corruption or powerful vested interests, they may be unwilling or discouraged from digging too deeply. Transparent and robust oversight and anti-corruption initiatives can help towards a working environment where honest officers are not demotivated and are able to undertake cases without fear of reprisal.

NGOs and journalists who conduct their own investigations into environmental crime and gain first-hand access to environmental criminals who reference corruption can use this information to call for greater transparency and accountability.

Corruption needs to be acknowledged as a key impediment to effectively tackling environmental crime, and one with lasting impacts across the entire criminal justice system. Strategies to combat environmental crime need to both run parallel to and incorporate anti-corruption measures.

Either way, what offenders say should be crucial to all those delivering an anti-corruption agenda.

## TACKLING CORRUPTION IN PRACTICE

Arguably, because environmental crime such as trafficking of ivory may be seen as ‘victimless’, it may be more susceptible to the corrupt involvement of agencies.

Anti-corruption methods need to incorporate both deterrent and preventative methods<sup>14</sup> working in tandem. There must be a commitment and active support to tackling corruption from political, enforcement<sup>15</sup> and judicial leadership.

The status of national or specialist units mandated to enforce environmental crime should be raised<sup>16</sup> and officers provided with a well-resourced working environment. Recruitment procedures for enforcement agencies should have the means to attract passionate, motivated and dedicated candidates, and include thorough background checks; ethics and integrity training should take place regularly and throughout an officer’s career.<sup>17</sup>

To work effectively, both internal and external specialist anti-corruption units require a strong mandate, capacity, security, requisite skills, ability to act independently, and jurisdiction.<sup>18</sup> The units themselves must also be accountable, including the officers of higher ranks.<sup>19</sup>

Corruption exists in many different ways: it may be in process or in financial terms<sup>20</sup> which means different skills and methods are required to identify and combat the conditions which allow corruption.<sup>21</sup>

Methods for identifying corruption should combine reactive procedures (such as mechanisms for internal and public complaint reporting and response) with proactive methods such as regular development and delivery of multi-faceted anti-corruption strategies which are reviewed for effectiveness, and risk assessments to identify and prioritise areas which are prone to corruption.<sup>22</sup>


Corruption is pernicious, and different working environments provide different challenges to combating corruption: insecure or conflict-affected border areas are some of the most challenging and dangerous.<sup>23</sup>

Resources including the *Wildlife and Forest Crime Analytic Toolkit* can assist in identifying technical assistance needs throughout the criminal justice system.<sup>24</sup>



ABOVE:  
Illegal ivory for sale in full view of local law enforcement in Linxia, Gansu Province of China, 2008. In places where illegal trade persistently happens, authorities need to commit to recognising and addressing the underlying reasons crime is occurring. This approach can involve many stakeholders.

## The Singapore Seizure



**Hong Kong Links**

Historically Hong Kong has played a pivotal role in the international ivory trade but recent investigations by EIA indicate that whilst the domestic ivory industry is in steady decline, Hong Kong-based traders remain central to the ivory black market. It is clear that despite protestations of ignorance by its directors, *Delight Harvest* is linked to a group of Hong Kong ivory traders who expanded their sphere of operation to Singapore in the mid to late 1980s.

*Far Left: George Poon, who made a fortune before the ban from poached ivory. Businessmen behind the ivory syndicate are linked to the Poon family.*

*Left: Shipping bill for consignment of timber from Sheng Luck to Singapore, faxed to 'Peter Wang' in Hong Kong.*

LEFT: EIA's report *Back in Business* (2002) detailed how the Singapore ivory seizure lifted the lid on a well-organised ivory smuggling network which had been operating since the mid-1990s. Some of the syndicate's key players were found to be connected to the Poon family, who had exploited various loopholes in the ivory trade system prior to the international ban to make a fortune out of poached ivory.

## DETECTING THE BOSSES

In environmental crime, law enforcement and prison services have immediate access to offenders. Information from and about offenders can be captured in both direct and indirect ways:

Direct:

- arrest interviews;
- investigations, including covert methods such as law enforcement officers posing as potential associates; appropriate surveillance including monitoring of communications;
- post-conviction prison interviews.

Indirect (information known personally to a source):

- human information sources (such as community who live where crimes happen, or covert informants who are embedded or associate with suspected criminals).

In environmental crime enforcement, these methods of engagement are used to varying extents.

Poachers and couriers are relatively visible and numerous, and arrests of these occur in both source and transit countries. Routine arrest interviews can identify opportunities for pursuing further lines of enquiry – including for units specialising in connected crime types, and for units in other countries. Conducted effectively, this process gathers information to profile future offences as part of proactive investigations.

For a number of reasons, in-depth investigations identifying and apprehending major criminals are rare – but not without precedent. In order to reduce risk of detection, those controlling the trade will limit the knowledge of supporting criminal actors and remain **protected**. An ivory trader in China told EIA in 2010: *‘Generally, the big bosses don’t show their faces’*, which highlights why targeted investigations, incorporating a more sophisticated range of techniques, are sorely needed.

The UN Convention Against Transnational Organised Crime and UN Convention Against Corruption encourage special investigation techniques for the purpose of effectively combating organised crime and corruption, in accordance with what is possible and permissible under domestic law.<sup>25</sup> For competent agencies with appropriate jurisdiction, these techniques can identify and engage the individuals with an intimate knowledge of how the trade is conducted, as well as offenders who represent the best value for money for where scarce enforcement resources can be directed.

As highlighted by the CITES Secretariat in relation to the illegal rhino horn trade,<sup>26</sup> there is a general lack of understanding of the criminality higher up the trade chain. One reason is that the tactics highlighted are not universally embedded. Informants and covert investigations generate intelligence, but the extent to which they are deployed varies, including between source, transit and demand countries.

If actionable intelligence is being proactively generated, it shows that one of a suite of more effective enforcement responses is taking place. Likewise, post-operational assessments can use what criminals think to indicate whether enforcement has actually had the intended impact.

Despite arrests, conviction rates and sentencing for environmental crimes are notoriously low. The whole criminal justice system, not simply enforcement officers, has to respond effectively.



ABOVE: Law enforcement should target persistent and prolific criminals. The above trader has consistently offered Asian big cat skins to EIA investigators, whilst describing how his connections enable him to avoid prosecution. © EIA



## WHOSE PERCEPTION IS IT?

Offenders engaged during the course of an investigation bring to the table their own agendas. When engaging with undercover officers, they may exaggerate to gain trust or smooth expected business along. In arrest interviews, they may be antagonistic, or they may be cooperative and provide valuable information. Gaining worthwhile and appropriate information is dependent on using trained officers who are experienced in a range of lawful investigation and interview techniques.

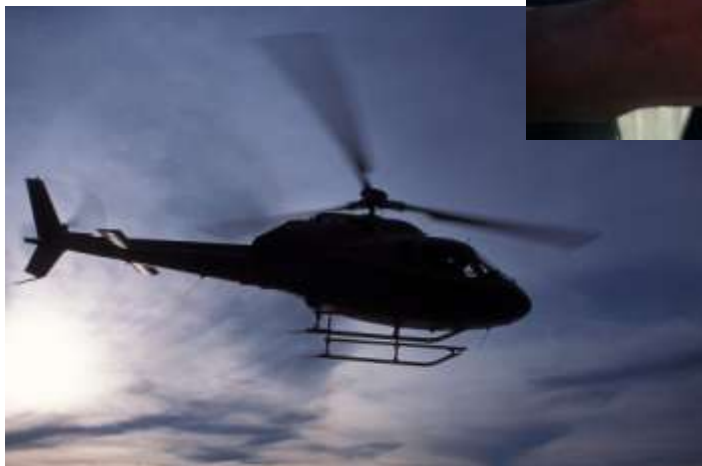
For the researcher/analyst, information from offenders can be gathered and analysed against information from informants, enforcement officers, the community, and contemporary and historical incidents. This process is already used in strategic problem solving.<sup>27</sup>

Just because someone has claimed something does not make it true: the source, nature and handling of all information must be considered, with obvious discrepancies noted and corroboration sought. Statements may be vague or open to interpretation: checks and balances against introducing bias should be used.

Those working outside enforcement agencies, including academics, can also carry out semi-structured interviews with offenders who are consenting participants, so responses can be compared and conclusions made.<sup>28</sup>



A wide variety of tools and methods are needed to combat environmental crime. Units need sustainable funding, dynamic leadership and the tools to respond effectively, but reducing crime is not the job of enforcement agencies in isolation.



ABOVE: Training on use of GPS devices, South Luangwa, Zambia.

LEFT: Helicopter above South Luangwa, Zambia.

Both © Mary Rice / EIA

## BENEFITS TO STAKEHOLDERS

### Knowing offenders' motivations and their perceptions about what helps them do

business – including offenders with greater knowledge of trade – would benefit the variety of stakeholders who have jurisdiction and interest in combating environmental crime. This information can strengthen formalised activities across different areas:

#### *Relating to criminal justice system and resource allocation:*

- generates intelligence, which after evaluation and analysis can develop proactive investigations including profiling of subjects and premises;
- identifies parallel activities which helps evidence-gathering for other suspected offences such as money laundering and tax offences;
- encourages cooperation such as when offender describes criminal links to other locations, in which case the corresponding authorities can be cooperatively engaged;
- gains specific information on concealment methods which helps to direct tactical resource tasking such as equipment or detection dogs at ports of exit, or additional human resources at a border crossing exploited due to lack of officers;
- informs results analysis on effectiveness of operations: **offenders' perceptions** before and after operations take place;
- provides an indication of what kind of operational decisions are being made to combat crime and how they could be extended to include more effective and specialist investigation methods;
- identifies a range of facilitators to criminal activity which can be used to appeal for additional resources and application of anti-corruption measures.

#### *Relating to crime prevention activities:*

- **helps 'map' crime and identify gaps and weakness** from which intervention and prevention measures can be developed;
- gains specific information on methods (MOs) which helps to strengthen weaknesses in the locale which create opportunities to commit crime;
- directs preventative patrols and helps site guardians exercise specific preventative measures.

#### *Relating to roles and activities of civil society and policy makers:*

- supports calls for improved transparency and anti-corruption measures when that offenders identify corruption and weak governance as helping their activities;
- enables civil society to further hold governments accountable to their commitments to reduce crime including as a counterweight to official reports which downplay or deny there is a crime issue, or that enforcement has been completely effective;

*Relating to roles and activities of civil society and policy makers, continued:*

- helps develop studies on the effectiveness and impact of decisions around policy, legislation and trade such as whether offenders reference these international/national decisions as facilitators or disruptors of criminal activities
- in the case of rumours of opening trade, **provide early warning of offenders' expectations** of the impact of expected decisions on business; likewise can be taken into account when developing new policies and legislation;
- helps to develop and target demand-reduction initiatives by gaining information on trends and specific demographics of market demand;
- **can provide an 'early warning' indicator for conservation and protection measures** when offenders speak of sourcing replacement species;
- profiles offenders against their motivations so appropriate and more effective criminal justice responses can be developed whether punitive, restorative or diversionary;
- is of interest for stakeholders in associated cross-cutting issues such as weapons proliferation which impacts upon poaching, or infrastructure projects which can impact upon wildlife collection trends.

*Relating to activities of academics and media:*

- is a resource for research into criminal motivations, psychology, and deterrents;
- is a resource for enhanced understanding of environmental crime;
- is a resource to develop tools to engage all stakeholders in multiple actions to **detect, prevent and reduce crime (e.g. 'crime scripts')**.

## APPLYING CRIMINAL PERCEPTIONS

Perceptions can be applied in a variety of ways which can benefit a range of stakeholders in environmental crime.

### Profiling criminal activities

Profiling generates an overview of core and associated criminal activities and methods they use, and can also help to explore potential links between cases.

In a report on trade in Sumatran tigers, TRAFFIC feature an interview with a tiger hunter to explain poaching methods, competition and markets.<sup>29</sup> EIA investigations in Zambia in 2010 recorded the perceptions and attitudes of significant, urban ivory traders operating at that time, which here has been used to develop the following general composite profile of criminal activity at that time.

*Source of ivory: "From Zimbabwe, Democratic Republic of Congo (DRC), Namibia, Botswana and Angola. There are differences between certain countries: Zambian ivory can be sourced, but it might not be as good quality, it's smaller. It's cheaper to buy ivory in Angola. Poaching is easy in Zimbabwe, and you also get rhino horn from there. Some of the people we know just specialise in rhino horn, they don't deal in ivory."*

*Trafficking: "Corruption helps business. When you transport ivory, you can either make payments, in which case you might have to pay on both sides of border, or you can use your connections inside agencies. So it helps if you know a Customs officer and it helps to keep track of where he's posted and change the route you take when you need to. But in some countries, like DRC for example, they don't even bother to ask what you're transporting – but paying money can still help. It also helps to use transport that isn't checked much, such as aid vehicles, or use diplomatic channels."*

*"We send ivory out either by plane or by ship. It's easier by ship. Lots of people put ivory into containers of timber. There are tricks to packing it so it won't get detected, like if you wrap it in aluminium foil. South Africa is a common exit, or we can use Tanzania, Mozambique or Kenya."*

*Market: "Mostly, ivory goes to China. The big buyers are Chinese, they buy big quantities. We're in contact with them."*

*"We also sell direct and regularly to Chinese people in this country. So you get to know the Chinese words for certain products and the prices. But there have been buyers from other countries too, like from France."*

*Supply: "We've got a quarter to nearly half a tonne available at the moment, and we can organise between a tonne and two tonnes in a month."*

*Criminal justice system: "Trust is important to business. Even if you do get caught, you can go through the system and get out fairly fast, if you pay money."*

*Other activities: "We've been in this business for a long time. We also deal in diamonds, copper, gold. But tougher laws mean it's harder to smuggle diamonds out of Angola – it's easier from Zambia now. We do other business too: every day, legal business."*

Several of the trafficking methods traders in Zambia highlighted were also described that year by ivory traders at the consumer end in Hong Kong and Guangzhou, China: *'Some do it [trafficking] by using waste ... you know how people trade in waste material from overseas ... they arrange a container for that ... and use aluminium foil ... because [X-ray] can't look through.'* Interceptions of ivory shipments demonstrate the method of concealing ivory in waste and timber, ivory wrapped in foil, and the use of diplomatic links to traffick ivory.

Profiles can be more detailed or general, and can generate prioritised operational and strategic options for future action. These options might identify:

- need for training of officers to effectively deal with offences outside their traditional remit;<sup>30</sup>
- engagement of additional agencies with jurisdiction and specialisation in crimes related to other commodities, such as rhino horn or minerals, for intelligence-sharing or joint operations;
- targeted operations against identified profiled premises, vehicles and trafficking routes;
- engagement of port authorities for targeted methods of detecting contraband and development of risk assessments;
- collaboration with authorities in other countries based on specific intelligence, or request to participate in specialised co-ordinated operations;
- need for anti-corruption initiatives, including to investigate specific agencies and units;
- need for specialist prosecutors and judicial reform.

## ASSESSING THE DAMAGE

Governments may report to CITES that crime has been effectively deterred,<sup>31</sup> but this is not supported by evidence of tangible, measurable reductions in crime. Without context, isolated actions may be painted as successes, but crime keeps on happening. This is evidenced by persistent traders operating in well-established trading hubs.

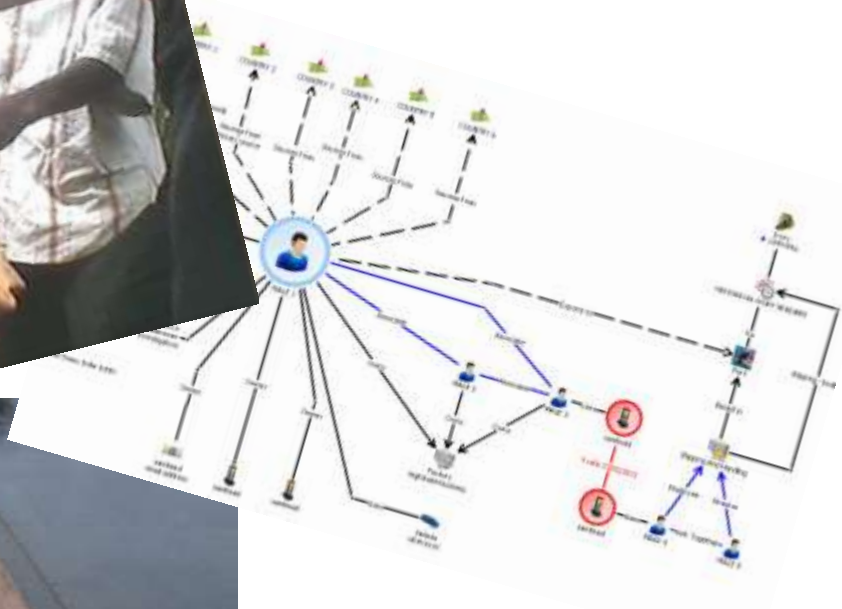
If governments reported against a range of indicators relating to all stages in the criminal justice process, including deployment of more sophisticated enforcement methods, and conducted post-operational assessments of targeted actions, it would indicate a more thorough, committed and proactive approach to reducing illegal trade.

Assessments should take place following an operation to find out how effective actions have been – and to ensure the same problems do not continue.<sup>32</sup> Knowing what offenders think can be a worthwhile indicator when assessing whether the right kind of disruptive or diversionary tactics have been deployed.

Known offenders stating that targeted enforcement has stopped them from committing a particular criminal activity has been one positive outcome of problem-solving operations, **resulting in significant reductions in crime: the heat simply isn't worth it.**<sup>33</sup>

But there are different kinds of ‘offenders’ who have different motivations.<sup>34</sup> Hunting may be a traditional subsistence activity, but absence of other income plus outside demand may instead encourage hunting for profit. Alternatives can dissuade from this,<sup>35</sup> and in the case where activity is illegal, alternatives can reduce criminalisation of communities and risk of exploitation by others.

Post-conviction interviews can profile ‘types’ of criminals and explore whether the legal sanction they receive upon conviction (fine, imprisonment, community service) has actually deterred them from committing future crimes. Wealthy criminals may view fines as just another ‘business expense’, so more effective punitive actions should be considered, where feasible under law.<sup>36</sup> In other cases, restorative justice rather than punitive justice might be a more favourable response for another ‘type’ of offender who has different motivations or choices in committing crime.



DISRUPTIVE TACTICS:  
From source to trafficking to market, insider information gives more options to combat crime in more ways.

TOP LEFT: Tusks from young elephants for sale in Tanzania in 2010, identified during covert investigations. © EIA

TOP RIGHT: Integrating information from a range of sources such as investigations, arrest interviews, telephone records and existing criminal cases can help understanding, focus targets and explore further leads. © EIA

LEFT: Tusks seized by Customs in Hong Kong, 2003. © Mari Park / EIA

## INTERNATIONAL DECISION-MAKING AND WHAT CRIMINALS THINK

EIA investigations have discovered that criminals do think of CITES – but CITES does not necessarily reciprocate. From 2000 onwards, ivory traders in the demand country of China have given EIA many insights into the blooming and tenacious illegal trade, from exploitation of loopholes to organised criminal activities.

A picture emerges of unevenly applied enforcement effort, with some sections of the authorities enforcing against the illegal trade and others profiting from it. Enforcement against premises trading ivory are typically described as checks and confiscations, rather **than operations successfully targeting the ‘big bosses’ of the ivory trade. The entire time,** traders have consistently referenced collusion and corruption, and how their government generates profit from ivory trade.

International ivory trade was banned in 1989. Following two CITES-approved sales in 1999 and 2008, by 2013 there was an acknowledged massive rise in elephant poaching and illegal ivory trafficking<sup>37</sup> against a backdrop of minimal convictions in major criminal cases.

**Yet discussions around ivory trade rumble on in CITES: for example a ‘Decision-Making Mechanism for Process of Trade in Ivory’ (CITES Decision 14.77) was adopted in 2007 and on the agenda for the 16<sup>th</sup> Conference of the Parties (CoP) to CITES in 2013.**<sup>38,39</sup>

Mali (2012) has formally expressed its concern that international discussions could affect the decisions of criminals:

*‘Mali is concerned that the international community (and particularly the criminals involved in illegal wildlife trade) may interpret the deliberations on the decision-making mechanism as an indication that the resumption of ivory trade is being discussed or has already been approved. This could lead to an increase in poaching and illegal trade ... Mali would like to know which measures will be taken by the Standing Committee before the decision-making mechanism is discussed at the CoP to prevent an intensification of poaching.’<sup>40</sup>*



LEFT:

Reality of poaching:  
a poached elephant  
in Kenya.

© Mary Rice / EIA

Ivory traders in China have demonstrated awareness of CITES and have anticipated how CITES will impact their business. In 1999, Botswana, Namibia and Zimbabwe were permitted through CITES to sell ivory to Japan; in 2000, when engaged by EIA, traders in China referenced that sale, stating: *'We have been longing for this opportunity'*.

One trader described the anticipated impact on his business of the elephant population downlisting in protection, from CITES Appendix I to Appendix II:

*'Since the last few years, the African ivories have been flooding everywhere like a disaster ... its protection has been downgraded from category one to two. In this trend, the relaxation will get more and more ... If the 'relaxation' continues, the ivory market, especially for craft items like what we have, will bloom vastly. It is almost impossible that our products will be stagnated in market.'*

– Ivory trader in China, 2000

Traders have also revealed loopholes in China's domestic legal ivory trading system. While well aware of the 1989 international ban, traders in 2000 described various ways to circumvent it. One such method was by 'forgetting' to register 'old' (pre-1989) stock:

*'The licence will indicate that the items were made 10 years ago. I can say that I bought them 10 years ago but I did not make the application at that time. Very natural indeed. Now I 'become aware' of the need to do so.'*

– Ivory trader in China, 2000

Traders also noted the importance of connections, corruption and collusion to business:

*'You need to manipulate some relationships to do the export.'*

– Ivory trader in China, 2000

*'Most of the officers in Customs normally pretend not to see anything.'*

– Ivory trader in China, 2000

In terms of supply and control of that supply, one trader observed:

*'In the past, in mainland China ... even after the ban in 1989, huge amount of stock has still been kept by big department stores and trading companies ... since the last one or two years, we have not had such a huge quantity. If you want to find some, relatively it's still available. The properties of the Communist Party are pretty huge. So 'She' just sells it, bit by bit, slowly, with a good price.'*

– Ivory trader in China, 2000

These perceptions allow a look at trends in demand, supply and the nature of regulation and enforcement. Given that in 2000, traders discussed the lack of clarity around legislation, enforcement collusion in illegal trade, and government interests in ivory, from what follows it appears that these issues were never adequately addressed or reconciled.



In 2002, CITES approved a second ivory sale by elephant range states, but the actual sale to both Japan and China did not occur until 2008. The significant time lapse between the CITES decisions and actual implementation kept the discussion on the table. China itself reported that: *'Many Chinese people misunderstand the decision [to sell to Japan] and believe that the international trade in ivory has been resumed.'*<sup>41</sup>

Even by 2003, ivory traders in China engaged by EIA were concerned about supply. They spoke of not being able to guarantee availability: *'Stock is not always available to you, unless it is a Government deal.'*

In 2004, China was said to have demonstrated 'significant and commendable improvement of its law enforcement effort in dealing with a serious illegal ivory problem.'<sup>42</sup> The verification mission that took place in March 2005 concluded it was 'abundantly clear that China is now firmly committed to eradicating illegal activities' and that the legal ivory trade system 'offers an opportunity to eradicate, or at least significantly reduce, illicit trade.'<sup>43</sup>

Traders encountered by EIA mentioned checks on premises, but apparent ease of evading detection: *'If the authorities conduct a check, they [the traders in shops] keep them [ivory products] hidden away. Otherwise, they will be confiscated.'* Traders demonstrated awareness of the international ban although there were ways to circumvent it, such as 'cultural exchanges': *'On the surface it looks like a 'cultural exchange', but in actuality, it is for commercial purpose.'*



ABOVE:  
Far and wide: framegrab of illegal ivory for sale in Lhasa, Tibet Autonomous Region, 2007, with no evidence of enforcement or control.

© EIA

The overall tone of conversations shifted and traders began describing trafficking activities, including large consignments, in greater detail.

When acknowledging some confiscations by Customs, traders also advised on trafficking methods for small items carried on the person. Yet they also described the movements of containers of ivory and the high costs associated with trafficking.

The clandestine nature of illegal trade was summarised by one trader who said: *'as for business, we have to respect our segment' – that 'don't ask' attitude helping business; in addition, how to take measures to reduce risk: 'we have risks too ... that is why I have a few factories scattered about.'*

By that time, the domestic market had grown: *'Actually, the domestic sale of ivory is already very good and sells very well'* with ivory products demanded *'as presents for high-ranking Government officials. Especially if it's to win a promotion at work.'*

Even then, the CITES-approved sale of ivory to China did not actually take place until more than three years later, in November 2008. In 2010, EIA engaged traders in China and Hong Kong, who described the quantity from this 2008 legal sale as minimal in comparison to demand – basically, a drop in the ocean:

*'70 tonnes will all be used on the mainland. 70 tonnes is very little ... They won't carve these stuff with their 70 tonnes ... these are difficult to sell. They make these ... one year it will all be gone! There are so many people ... even if they kill all the African elephants, it won't be enough to make these [chopsticks]'*

– Ivory trader in Hong Kong, 2010

The amount sold to China was actually less, at a reported 62 tonnes:<sup>44</sup> not only did ivory traders perceive that more legal ivory was available than was sold through CITES, they also believed this amount was not enough to satisfy market demand.

Traders also noted the ubiquity of illegal, trafficked ivory on the market, findings which have been since confirmed by independent investigations:<sup>45</sup>

*EIA: How much of the raw materials available in the market is legal?*

*Trader: Not even 10 per cent.*

– Ivory trader in China, 2010

Reports of enforcement were varied; the Asian Games was given as a reason for strict checks, rather than any long-term commitment. Rather, if you continue about your business quietly, you should be okay:

*'We dare not do it too big. Even though the Government doesn't have their eyes on you every day, you can't 'beat the drum' about it either. Otherwise, for them, they are unable to keep it under the lid. It's always like that.'*

– Ivory trader in China, 2010



LEFT:

EIA's end-2010 investigations in Hong Kong and Guangzhou, China assessed **the implementation of China's ivory** trade regulation and registration system.

EIA investigators engaged both legal and illegal traders who described rising demand, high prices and the prevalence of illegal ivory on the market.

The CITES-sanctioned sale in 2008 has failed to either reduce the price of ivory or curb illegal trade.

© EIA

Traders described the risks and 'sensitivities' involved in illegal trade, one even referencing the SFA's legal trade guidance, but this didn't mean it could not be done.

In 2010, trafficking methods and routes were referenced with far more frequency and detail than in any previous year. The importance of Vietnam, Guangxi and Hong Kong; the **smuggling of ivory wrapped in aluminium and concealed in waste (reflecting that year's information from traders in Zambia)** and carried in cages beneath vessels; continued references to corrupt Customs officers.

The CITES Management Authority of China reports that it 'has tried her best to control the illegal trade in ivory. We have taken all measures we can take in the past. We don't know if there is any other country that does more than China'.<sup>46</sup> Yet according to the traders' perceptions, if 90 per cent of the ivory available to buy is illegal, what has gone wrong?

Before countenancing discussions on further legal trade, the CITES community needs to conduct a study into why current legal ivory trade systems and controls are failing.<sup>47</sup> **Incorporating traders' perceptions into the equation will help to inform this.**

Likewise, domestic legislation can stimulate demand and supply for CITES-listed species. **China's legal trade in Asian big cat skins from captive sources runs contrary to CITES Decision 14.69: 'tigers should not be bred for trade in their parts and derivatives' and has instituted a mechanism through which skins of wild Asian big cats, poached in source countries such as India and Nepal, could be laundered.**<sup>48</sup>

EIA has documented the impact on business of **China's Government Notification 139 (2005), which 'enables the pilot use of captive-bred tiger bone for medicine and the reduction of the use of leopard bone.'** This Notification is referenced in a report and business plan prepared in 2005 which describes the 'great market potential' for tiger bone wine, prompting the Sanhong Biotechnology Company to invest millions to produce a range of 'Real Tiger Wine'.<sup>49</sup>

**China's Government policy has encouraged the growth and expansion of operations licensed to keep and breed tigers.** The trade from these facilities directly contradicts demand-reduction initiatives and undermines both domestic implementation of CITES and international conservation programmes such as the Global Tiger Initiative (GTI), aimed at doubling the world's wild tiger population by 2022 and ascribed to by all tiger range countries, including China.

The lack of clarity regarding domestic legislation, failure to implement CITES domestically, and unevenly implemented enforcement means that governments themselves have both directly and indirectly stimulated demand, and traders are profiting from it.<sup>50</sup>



ABOVE:

EIA has documented skins of captive bred tigers being offered for sale in China, accompanied by permits issued by the State Forestry Administration (SFA). The associated regulation system is flawed: traders describe ways in which it can be abused, including through the re-use of permits and falsification of origin.  
© EIA

## PREVENTING CRIMES

Preventing criminal activity can start with harmonising domestic legislation with commitments under international mechanisms such as CITES, and continues with listening to offenders to inform prevention and diversion actions.

Knowing what offenders think has a huge potential to influence crime prevention activities, and it is often in this context that offender attitudes are gathered and used for other crime **types. This information gives insights into criminals' techniques and strategies, along with their reasoning while offending.**<sup>51</sup>

Interviewing at the post-conviction stage has the advantage that offending histories can be corroborated. Hearing directly from convicted criminals what real-world conditions enabled them to commit crime helps to make coordinated and nuanced prevention campaigns which complement legislation – whether those campaigns incorporate anti-corruption initiatives, better targeted patrols, improvements in the awareness of judiciary, or warning guardians of resources what actions they can take to prevent crime.<sup>52</sup>

## 'MAPPING' CRIME—AND NETWORKS

**Criminologists can use offenders' attitudes to profile and 'map' crime. This can include crime scripts, which looks at all the elements involved in a crime: before, during and after.**

**A 'script', like a film script, sets out who the actors (offenders) are, where they operate, and what actions are required to expedite the offence. Scripts can '*... draw from multiple information sources; interviews with offenders (to get their crucial viewpoint), [or] detailed investigative notes.*'**<sup>53</sup>

When the stages of crime and its actors are mapped holistically like a flow, gaps and weaknesses enabling crime can be identified, and corresponding intervention points developed – along with what is not known. The advantage of this process is that it then identifies the agencies and policy-makers responsible for different facets of enforcement and prevention – because reducing crime is not the job of enforcement agencies in isolation.<sup>54</sup>

**Taking it a step further, Morselli and Roy's work (2008) on stolen vehicle exports incorporated these crime scripts on criminal decision-making processes, but merged it with analyses of criminal networks because '*without an understanding of the people executing [crime] we would have difficulty assessing a strategy for disrupting the process.*'**<sup>55</sup>

This project used information related to Canadian Operations Siren and Togo of Project CERVO (1993-2005), a task force of law enforcement and security agencies. To understand who the criminals were and how they conducted business up and down the chain, they used information held by a number of agencies and, notably, transcripts from arrest interviews, police affidavits, physical and electronic surveillance transcripts, intelligence reports and information from past investigations.<sup>56</sup>

## RECOMMENDATIONS

Tackle corruption in environmental crime, by:

- using tools such as the ICCWC Wildlife Crime and Forest Analytic Toolkit to identify and analyse general corruption offences under domestic criminal law, enforcement measures relating to corruption investigations, and measures to combat corruption of prosecution services and judiciary
- strengthening national anti-corruption legislation, bodies and oversight
- encouraging transparency including engaging independent stakeholders, including civil society, to monitor processes
- incorporating anti-corruption legislation to environmental crime investigations.

Further development of an intelligence-led, problem-solving culture in environmental crime enforcement, to:

- enhance understanding of the value of using intelligence to effectively combat criminal activity
- designate intelligence leads within agencies and units to act as focal points and promote understanding of intelligence-led activities
- develop capacity to gather, analyse and action intelligence
- undertake targeted investigations and interventions based on thorough problem analysis
- conduct post-operational evaluations
- include environmental crime priorities within organised crime strategies.

Engage and target environmental criminals, by:

- using corroborated criminal information as a source of intelligence to generate tactical and strategic profiles of subjects, premises, locations and risks to support continuing investigations, evidence-gathering, analysis and resource assignment
- using information to develop collaborative operations with other existing law enforcement or intelligence agencies and specialist units, both domestically and internationally
- conducting post-conviction interviews
- using information to help inform resource-allocation
- using information to develop crime-prevention strategies, including diversionary and alternative schemes
- using information to inform overall punitive or restorative legal sanctions.

Incorporate criminal perceptions into CITES, other multilateral environmental agreements and bilateral decision-making processes, to:

- fulfil reporting requirements against distinct and wide-ranging criminal justice activity indicators
- recognise and incorporate criminal perceptions in discussions as indicators of trends in supply, demand, substitute species and enforcement activities
- incorporate criminal perceptions in studies on impacts of CITES decisions and other processes.

Generate a body of literature to inform awareness and policy-making to:

- develop body of literature addressing environmental crime
- utilise criminal perceptions to develop crime detection, disruption, prevention and reduction measures.



ABOVE: Ivory burning in Kenya, 2011.  
© Mary Rice/EIA

## References

1. Questionnaires such as these have the advantage of highlighting what is perceived by the victim as criminal behaviour, such as types of anti-social behaviour, although in reality this behaviour might not actually be an offence under existing criminal law. These surveys may also capture unreported crime, so the results may indicate the presence of crimes that have not been officially reported to police. These types of surveys can be naturally subject to constraints, such as: only accessing and capturing the views of certain sections of population; embedded assumptions expressed in question format; the subjective response of the respondents based upon a host of factors, including personal experience; and the fact that different types of offences will be reported in different means, so **'unreported crime' captured in a survey may be skewed towards, and therefore representative of, only certain kinds of offences.** This point is included to demonstrate the limitations and challenges in constructing these questionnaires, which should be taken into account when designing a way to record perceptions of victims or criminals. See also, British Crime Survey (BCS).
2. Concentration on victims as opposed to criminals is likely due in part to several factors: e.g. the covert nature of criminal activities in the first place; the moral imperative for attention and action is directed towards assisting victims of crime and the non-criminal community; police and decision-makers are required to be aware of, accountable and reactive to community perceptions of crime and fear of crime; sociological research may tend towards identifying at-risk and vulnerable groups, such as women, to develop preventative and support solutions; even the existence of culture that does not wish to **'legitimise' criminals by soliciting their views.**
3. With general reference to crime, a feeling of scrutiny can be imposed through conditions such as (a) the presence of effectual enforcement officers or community monitors, (b) from what is known in crime prevention circles as **'natural surveillance'**, meaning how the physical environment makes offenders feel exposed, such a feeling of **'no place to hide'**. More generally, media and civil society scrutiny can also help, including civil society monitoring of processes.

(reference 3 continued)

Civil society outrage around the Anson Wong case led to pressure to reform the law: *'...the Malaysian people read about his [Wong's] exploits in National Geographic. Outraged, they wrote letters to their newspapers, which covered the story on their front pages. Parliament passed new wildlife laws, and the government announced administrative reform. Anson Wong was stripped of his business licenses and went to prison in Malaysia'*. From Bryan Christy (2013), *CITES ivory policy is on drugs*, National Geographic (28<sup>th</sup> February 2013) at <http://newswatch.nationalgeographic.com/2013/02/28/cites-ivory-policy-is-on-drugs/> [Accessed 4<sup>th</sup> March 2013]

4. United Nations Environment Programme (UNEP) Global Environmental Alert Service (2013) *Transnational Environmental Crime – A common crime in need of better enforcement* (January 2013) at [http://na.unep.net/geas/archive/pdfs/GEAS\\_Jan2013\\_EnvCrime.pdf](http://na.unep.net/geas/archive/pdfs/GEAS_Jan2013_EnvCrime.pdf) [Accessed 18<sup>th</sup> February 2013]

5. United Nations Office on Drugs and Crime *What does environmental crime have in common with organized crime?* webpage at <http://www.unodc.org/unodc/en/frontpage/what-does-environmental-crime-have-in-common-with-organised-crime.html> [Accessed 4<sup>th</sup> March 2013]

6. Environmental Investigation Agency (2012) *Rosewood Robbery: The case for Thailand to list Rosewood on CITES*

7. Thailand and Vietnam (2012) *Consideration of Proposals for Amendment Of Appendices I and II, CoP16 Prop. 60*

8. Charles F. Mason, Erwin H. Bulte, Richard D. Horan (2012) *Banking on Extinction: Endangered species and speculation*, Oxford Review of Economic Policy, Volume 28, Number 1, pp. 180-181 [Accessed 9<sup>th</sup> February 2013]

9. The Economist (2002), *Out of the Blue: Trade in Endangered Species* (31<sup>st</sup> October 2002) at <http://www.economist.com/node/1416142> [Accessed 9<sup>th</sup> February 2013]

10. EIA (2010), *Enforcement not Extinction*

11. New York Times (2013) *In Trafficking of Wildlife, Out of Reach of the Law* (3<sup>rd</sup> March 2013), at [http://www.nytimes.com/2013/03/04/world/asia/notorious-figure-in-animal-smuggling-beyond-reach-in-laos.html?pagewanted=all&\\_r=1&](http://www.nytimes.com/2013/03/04/world/asia/notorious-figure-in-animal-smuggling-beyond-reach-in-laos.html?pagewanted=all&_r=1&) [Accessed 4<sup>th</sup> March 2013] and Denis D Grey (2012), *Thailand Wildlife Trafficking Seizures Increase Tenfold, But Corruption Still Persists* (15<sup>th</sup> August 2012) at [http://www.huffingtonpost.com/2012/08/15/thailand-wildlife-trafficking\\_n\\_1778497.html](http://www.huffingtonpost.com/2012/08/15/thailand-wildlife-trafficking_n_1778497.html) [Accessed 29<sup>th</sup> August 2012]

12. *'Corruption generally comprises illegal activities, which mainly come to light only through scandals, investigations or prosecutions. It is thus difficult to assess absolute levels of corruption in countries or territories on the basis of hard empirical data. Possible attempts to do so such as by comparing bribes reported, the number of prosecutions brought or court cases directly linked to corruption cannot be taken as definitive indicators of corruption levels. Rather they show how effective prosecutors, the courts or the media are in investigating and exposing corruption. One reliable method of compiling comparable country data is to capture perceptions of those in a position to offer assessments of public sector corruption in a given country.'* From Transparency International, webpage *Why is the CPI based only on perceptions?* [http://cpi.transparency.org/cpi2011/in\\_detail/#myAnchor4](http://cpi.transparency.org/cpi2011/in_detail/#myAnchor4) [Accessed 24<sup>th</sup> July 2012]

The Elephant Trade Information System (ETIS) previously incorporated TI Perceptions of Corruption into its analysis of illegal ivory trade, which reports to CITES.

13. For example EIA (2008), *Skin Deep: The need for effective enforcement to combat the Asian big cat skin trade*. See also Maurice Kugler, Thierry Verdier and Yves Zenou (2003) *Organised Crime, Corruption and Punishment*, The Research Institute of Industrial Economics, Working Paper No. 600

14. McCormack (1996) on *'deterrence and voluntary compliance'* cited in Tim Newburn (1999) *Understanding and preventing police corruption: lessons from the literature* Policing and Reducing Crime Unit: Police Research Series paper 110, p44

15. Gareth Newham (2011) *Tackling Police Corruption: Is an Independent Police Corruption Investigation Unit enough?* Institute for Security Studies, p6

16. EIA (2010), *Enforcement Not Extinction*

17. Tim Newburn (1999) *Understanding and preventing police corruption: Lessons from the literature* Policing and Reducing Crime Unit: Police Research Series paper 110, pp 28-29

18. Listed under *Reasons why specialised anti-corruption units fail are: 'Insufficiently independent from interference; Inadequate resources and capacity and security; No incentives to attract the required Investigators; Is not held properly*



accountable for its performance or the conduct of its members' in Gareth Newham (2011) *Tackling Police Corruption: Is an Independent Police Corruption Investigation Unit enough?* Institute for Security Studies , p10

19. See NYPD IAB example: 'Commanders also tested for adherence to supervisory responsibilities' in Gareth Newham (2011) *Tackling Police Corruption: Is an Independent Police Corruption Investigation Unit enough?* Institute for Security Studies , pp 14-15

20. Tim Newburn (1999) *Understanding and preventing police corruption: Lessons from the literature* Policing and Reducing Crime Unit: Police Research Series paper 110

21. Gareth Newham (2011) *Tackling Police Corruption: Is an Independent Police Corruption Investigation Unit enough?* Institute for Security Studies p16: provides two models for addressing police integrity, being deterrence model and opportunity-focused model, latter 'identifies the conditions preset for corruption to flourish' referenced to Julie Berg UCT Criminology.

22. Gareth Newham (2011) *Tackling Police Corruption: Is an Independent Police Corruption Investigation Unit enough?* Institute for Security Studies

23. Julian Rademeyer (2012) *Killing for Profit: Exposing the illegal rhino horn trade*. Cape Town: Zebra Press, p235

24. United Nations Office on Drugs and Crime (2012), *International Consortium on Combating Wildlife Crime Wildlife and Forest Crime Analytic Toolkit*, Vienna: United Nations

25. United Nations Office on Drugs and Crime (2012), *International Consortium on Combating Wildlife Crime Wildlife and Forest Crime Analytic Toolkit*, Vienna: United Nations

26. CITES Secretariat (2012), *Rhinoceros: Report of the Secretariat*, SC62 Doc 47.2

27. These kinds of information sources can also be used as part of an approach called 'ERASOR' which stands for Extra Routine and Systematic Opportunistic Research, of which qualitative interviewing, including of known and suspected offenders and prisoners, is a major component. This information is used to identify individuals and stolen goods and connected markets as part of the Market Reduction Approach (MRA), an inter-agency process designed to reduce theft, but suitable to other crime types. See Mike Sutton, Jacqueline Schneider and Sarah Hetherington (2001), *Tackling Theft with the Market Reduction Approach*, Home Office Crime Reduction Research Series Paper 8.

Sutton (2008) gives many examples from interviews with offenders in Mike Sutton (2008), *How Prolific Thieves Sell Stolen Goods: Describing, understanding and tackling the local markets in Mansfield and Nottingham – a Market Reduction Approach Study*, Internet Journal of Criminology

28. One method: Perceptions expressed by traders are summarised against certain themes, with evidential quotes. When this is undertaken over a period of several years, it gives a comparable overview within and across the years and within locations, according to the traders themselves. Questioning and information-gathering protocols are used (including style of questioning, introducing checks and balances, seeking verification, full and accurate evidence of conversations to accurately reflect findings and reduce introduced bias, in a process which screens what is pertinent, non-pertinent and appropriate information to gather, maintain and use. Processes are be subject to issues including access, scope, trust, ethics and scope which should be reflected and accounted for in the project outline.

29. Chris R. Shepherd, and Nolan Magnus (2004) *Nowhere to Hide: The trade in Sumatran tiger*, TRAFFIC Southeast Asia

30. For a discussion on the remit of fish and wildlife officers and how the offences they identify range from 'traditional law enforcement activities in addition to the type of enforcement customarily associated with fish and wildlife law enforcement', see Tara O'Connor Shelley and Matthew S. Crow, (2009) *The Nature and Extent of Conservation Policing: Law enforcement generalists or conservation specialists?* American Journal of Criminal Justice, Volume 34, Issue 1-2

31. CITES Management Authority of China (2012) *Conservation of and Trade in Asian Big Cats in China* at CoP16 Doc. 50 (Rev. 1), Annex 3 b, p3

32. See Center for Problem-Oriented Policing: *The SARA Model* at <http://www.popcenter.org/about/?p=sara>

33. Metal theft is a growing and pernicious problem in the UK, valued at over £220 million a year (BBC, (2012) *Metal theft: Tougher powers unveiled*, 8<sup>th</sup> November 2012) and feeding international markets. In north-east UK, Operation Hansell (2007) appeared to have little impact on metal theft; problem analysis identified the issue remained due in part to inadequate legislation, a situation where prolific offenders who had turned from other forms of crime to metal theft and a lack of knowledge around stolen asset markets. In 2011 a new campaign was launched, combining a change of local legislation

and engagement of prolific offenders alongside targeted operations at specific sites and institution of a participatory crime prevention scheme. This resulted in a 60 per cent reduction in the crime over a 12-month period, and criminals formerly engaged in metal theft reported to patrolling officers that they had been deterred from their previous activity due to the greater level of enforcement given to it. From Victoria Price, Durham Constabulary UK, (2012) *Reducing metal theft in County Durham and Darlington*, presented at the UCL Jill Dando Institute of Security and Crime Science International Crime Science and Intelligence Analysis Conference, 13-14<sup>th</sup> December 2012

34. Some offenders have less 'choice' about committing crime than others, or different choices to make. See the example from Russian conservation NGO Phoenix Fund of four categories of those involved in the illegal fur trade in Russia, as cited in Nigel South and Tanya Wyatt (2011) *Comparing the Illicit Trades in Wildlife and Drugs: An exploratory study*, Deviant Behaviour (32:6)

35. See for example Lebialem Hunters' Beekeeping Initiative at [www.bee4bushmeat.org](http://www.bee4bushmeat.org) [Accessed 23<sup>rd</sup> February 2013]

36. Verbal comms with Angus Nurse, February 2013

37. CITES Secretariat (2012), *Monitoring of illegal trade in ivory and other elephant specimens: Report of the Secretariat*, CoP16 Doc. 53.2.1

38. CITES Secretariat (2012) *Decision-making mechanism for a process of trade in ivory*, CoP16 Doc 36 (Rev 1)

39. EIA (2013), *Stop Stimulating Demand: Discussion of ivory trade mechanism may itself spur consumer demand and poaching*

40. Mali (2012) *Comments from Mali on the document entitled 'decision-making mechanisms and necessary conditions or future trade in African elephant ivory'*, CoP16 Inf 5, p13

41. China in CoP12 Inf. Doc 15, quoted in Bryan Christy (October 2012) *Ivory Worship*, National Geographic

42. Anon (2004) *Monitoring of Illegal Trade in Ivory and other Elephant Specimens*, CoP13 Doc. 29.2, p7

43. CITES Secretariat (2005), *Technical Mission Report: Verification mission related to the control of internal trade in ivory in China, 7-11 March 2005* SC53 Doc 20.1 Annex, p7

44. EIA (2011) *Briefing Document for the 61st Meeting of the CITES Standing Committee: Elephants*

45. Esmond Martin and Lucy Vigne (2011) *The Ivory Dynasty: A report on the soaring demand for elephant and mammoth ivory in southern China* London: Elephant Family, The Aspinall Foundation and Columbus Zoo and Aquarium

IUCN/SSC Asian Elephant Specialist Group (2012) *Status of Elephant Populations, Levels of Illegal Killing and the Trade in Ivory: A report to the CITES Standing Committee*, SC62 Doc. 46.1 (Rev. 1) p5 states: 'A worrying trend, however, which has become clearer since the preparation of document SC61 Doc. 44.2 (Rev. 1), is the significant deterioration in China's domestic ivory trade control system'.

See also EIA (2011), *Briefing document to the 61<sup>st</sup> Meeting of the CITES Standing Committee* and EIA, (2012) *Blood Ivory: Exposing the myth of a regulated market*

46. CITES Management Authority of China (2012) *Control of Ivory Trade in China*, SC62 Inf. 8, p2

47. TRAFFIC (2011) *Illegal Trade in Elephant Specimens in elephant conservation, illegal killing and ivory trade*, SC62 Doc. 46.1 (Rev. 1), p24: 'Failure to implement key regulatory features in China's legal control system, such as the visible display of product identification certificates with legal ivory products at the retail level, has been noted in recent published reports (Martin and Vigne, 2011; EIA, 2011). Such transgressions seem to have seriously compromised the integrity of the system and need to be addressed.'

48. EIA (2013) *Hidden in Plain Sight: China's Clandestine Tiger Trade*

49. EIA (2013) *Hidden in Plain Sight: China's Clandestine Tiger Trade*

50. EIA (in press) *Stop Stimulating Demand*

51. To make crime prevention recommendations about vehicle thefts, Copes and Cherbonneau (2006) conducted interviews with convicted vehicle thieves, both on community supervision and in prison. See Copes and Cherbonneau (2006) *Key to Auto Theft: Emerging Methods of Auto Theft from Offenders' Perspective* British Journal of Criminology Volume 46, Issue 5

52. Metropolitan Police UK crime prevention poster campaign on London Underground quotes criminals on how they opportunistically commit crime, seeking to raise public awareness of how to reduce opportunity (2013)

53. Lisa Tompson, Spencer Chainey (2011) *Profiling Illegal Waste Activity: Using Crime Scripts as a Data Collection and Analytical Strategy*, European Journal on Criminal Policy and Research, Volume 17, Issue 3

See also Graham Hancock (2010) *Organised Crime and Crime Scripts: Prospects for Disruption*. Presentation given to International Crime Science Conference, London 2010

54. EIA (2011) *Scripting the crime and identifying the target* and EIA (2011) *It matters what criminals think too*

55. Carlo Morselli and Julie Roy (2008) *Brokerage Qualifications in Ringing Operations* Criminology, Volume 46, Number 1

56. Carlo Morselli and Julie Roy (2008) *Brokerage Qualifications in Ringing Operations* Criminology, Volume 46, Number 1

## Acknowledgements

Thanks to Nic Crane, Angus Nurse, Henry Partridge, and Martin Peirson for feedback on this briefing.

Thanks to Andrew Lemieux for general comments on the use of information from arrest interviews in combating poaching, and to Lisa Thompson on use of crime scripts.

EIA uses IBM i2® intelligence analysis software.

Environmental Investigation Agency (EIA)  
62-63 Upper Street, London, N1 0NY  
email: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)

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

EIA US  
PO Box 53343, Washington DC 20009, USA  
Email: [usinfo@eia-international.org](mailto:usinfo@eia-international.org)

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

