

# Upholding the Law:

## The Challenge of Effective Enforcement



### Recommendations

This briefing calls upon Parties to the Convention on International Trade in Endangered Species (CITES) to acknowledge that environmental crime, including wildlife crime, is a form of serious transnational organised crime and to adopt appropriately stringent measures to tackle it effectively. Specifically, the Environmental Investigation Agency (EIA) urges Parties to:

- Support the draft Decisions in CoP14 Doc. 25 and Doc. 26 calling for a second meeting of the CITES Enforcement Expert Group
- Support the Secretariat's request for additional personnel to support effective enforcement of the Convention as outlined in CoP14 Doc. 7.3 (Rev.1)
- Support the recommendation of Germany on behalf of the EU in CoP 14 Doc. 42 for the provision of assistance to customs authorities in identifying and measuring CITES-listed timber species

EIA further recommends that Parties:

- Implement intelligence-led enforcement mechanisms as a means to combating illegal trade in wildlife and ensure proper enforcement of CITES; consider the parameters and performance indicators already employed by many national enforcement authorities in order to measure progress
- Participate in existing, and develop new, regional and multilateral initiatives to improve cooperation and coordination amongst enforcement agencies at bilateral and international levels, such as ASEAN-WEN (Association of Southeast Asian Nations Wildlife Enforcement Network) and the Border Liaison Offices established under the United Nations Office on Drugs and Crime (UNODC)
- Utilise all available legal instruments and protocols to combat environmental crime, such as the UN Convention against Transnational Organised Crime (UNTOC) and the UN Convention against Corruption (UNCAC)
- Support the CITES Secretariat in identifying ways to develop synergy with the Secretariat of the UN Commission on Crime Prevention and Criminal Justice (CCPCJ) under Resolution E/CN.15/2007/L.3/Rev.1 ('International cooperation in preventing and combating illicit international trafficking in forest products, including timber, wildlife and other forest biological products'), agreed at its 16th Session in April 2007
- Implement previous CITES recommendations urging Parties to establish specialised enforcement units to combat wildlife crime
- Consider the establishment of a single, internationally coordinated database storing all data pertaining to illegal wildlife trade as an alternative to the numerous databases currently in use and which the CITES Secretariat has highlighted as inefficient and ineffective<sup>(1)</sup>
- Commission a detailed assessment of the links between environmental crime and other forms of serious organised crime and conduct an analysis of the direct and indirect socioeconomic impacts of wildlife crime
- Coordinate measures to close legislative loopholes to enable better enforcement of CITES listings, such as upholding CITES listings in Free Trade Zones
- Recognise that Appendix III should be accorded the same level of enforcement effort as the other CITES appendices

**Transnational organised crime is considered one of the major threats to human security, impeding the social, economic, political and cultural development of societies worldwide<sup>(2)</sup>**

## Introduction

Effective implementation and enforcement of CITES is critical to the success of every aspect and objective of the Convention. CITES itself is a valuable enforcement tool capable of compelling Parties to legislate and take action to tackle environmental crime. However, as this briefing demonstrates through a series of case studies, this potential capability is not being realised and there are more effective enforcement mechanisms available to Parties than those currently being applied.

The current lack of effective enforcement in tackling environmental crime, including wildlife trade and illegal logging, has been tabled for discussion in over 20 documents before the 14th Meeting of the Conference of the Parties (CoP) to CITES, both in relation to general compliance and specific species, including Asian big cats, elephants, Tibetan antelope and bigleaf mahogany. Political commitment and investment in the requisite resources is inadequate, and national legislation is frequently marred by loopholes or undermined by contradictory legislation in fellow CITES Parties and species range states. The bold and innovative solutions recommended by CITES enforcement experts, including the

recommendations of the CITES Enforcement Expert Group following their first meeting in 2004, are yet to be fully implemented.

The illicit exploitation of the environment is recognised by the UN as a form of serious transnational organised crime.<sup>(3)</sup> Attracted by high profits and low risks of detection, such criminal activity is typically controlled by a minority of prominent individuals and established networks operating across multiple borders and continents. A disregard for finite natural resources means they will simply switch to alternative commodities once a supply has been exhausted.

The individuals at the centre of environmental crime are undeterred by the isolated seizures and arrest of minor players which characterise much of current enforcement efforts. Even when key offenders are convicted, the penalties are often inadequate to deter re-offending or disrupt established criminal networks in any meaningful way.

The frequent involvement of government officials links environmental crime to issues of corruption and bad governance, highlighting its contribution to cultures of lawlessness, impunity and social instability. According to the UNCAC and Transparency International respectively,

*Below:  
Seized African  
ivory inspected  
by Hong Kong  
customs  
officials, 2003*





corruption jeopardises sustainable development<sup>(4)</sup> and poses a threat to "domestic and international security and the sustainability of natural resources".<sup>(5)</sup>

Environmental crime can also provide venture capital for those engaged in other forms of serious organised crime. Such concerns were echoed by the UN general assembly in 2000 during the development of the UNCTOC, where the growing links between the illicit trafficking of wild flora and fauna and other forms of transnational organised crime were recognised.<sup>(3)</sup>

Environmental crime has a disproportionately negative impact on developing countries and the most economically marginalised sectors of society: it undermines sustainable development and detracts from national and international efforts to attain the UN Millennium Development Goals (MDGs) and implement the recommendations of the World Summit on Sustainable Development (WSSD).

If enforcement agencies tasked with tackling wildlife crime are to make an impact, a proactive, intelligence-led approach targeting key individuals and effectively disrupting criminal networks and activities is required.

## Intelligence-led Enforcement: Increasing the Risks, Eliminating the Profits

Without intelligence, enforcement officers can only operate on a reactive basis, with limited insight into which tactical responses should be adopted or where to direct resources.

Potential sources of intelligence are numerous and include witnesses, informants, convicted criminals, crime scenes and forensic information, undercover operatives and surveillance products. The expertise and technology exists to analyse vast amounts of intelligence, and official mechanisms (such as Interpol's Ecomessage system) are already established to facilitate its international dissemination. Systematic analysis of such intelligence and the mapping of criminal networks can illustrate the roles of key players. It can also provide insight into how other areas of legislation can be applied, such as those relating to the seizure of assets and other proceeds of crime.

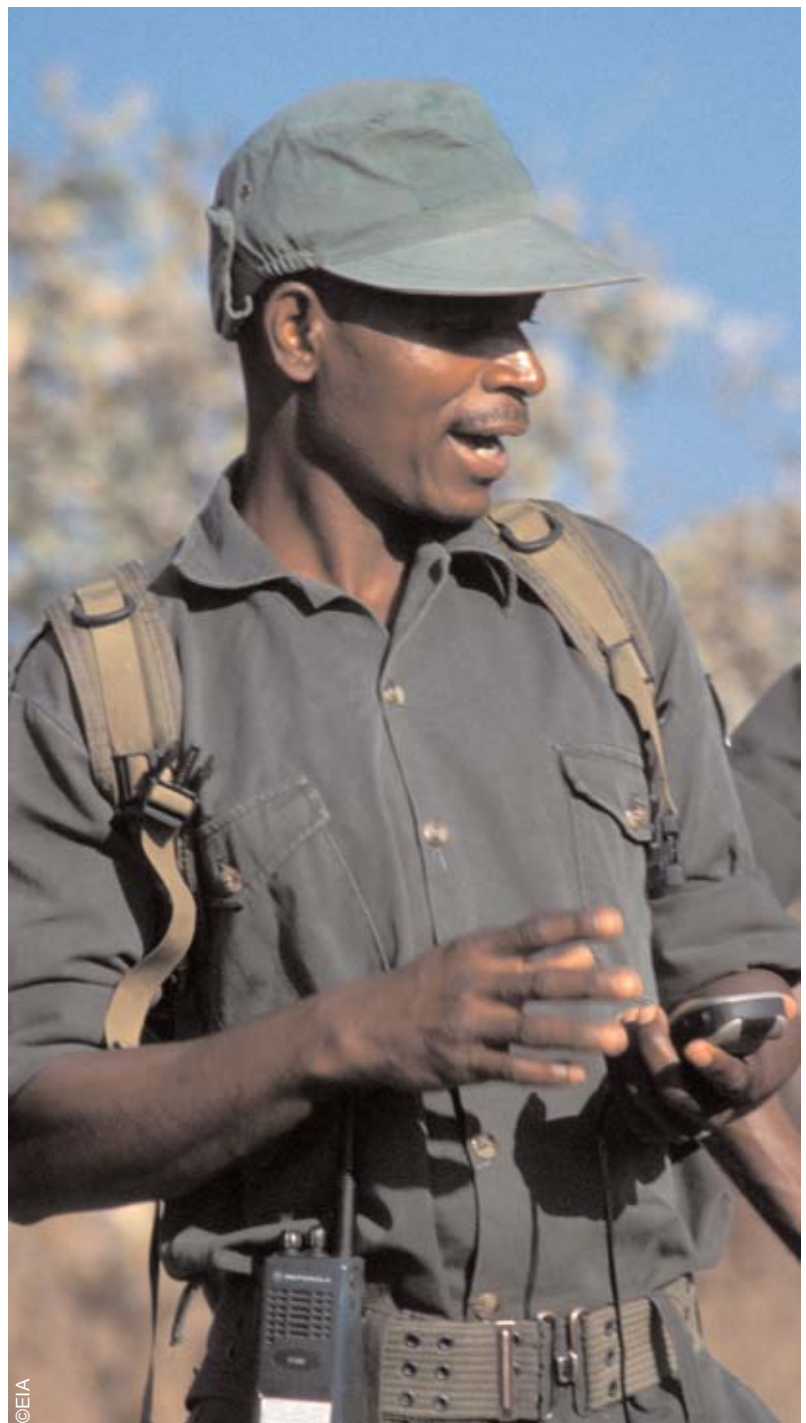
Despite the apparent awareness of the need for intelligence-led enforcement and numerous multilateral initiatives to enhance capabilities in this respect (such as workshops conducted under the auspices of ASEAN-WEN and

TRAFFIC) many Parties are yet to establish central multi-agency bodies to coordinate information sharing, investigative activities and tactical response. Furthermore, many Parties are yet to make full and effective use of the multilateral intelligence-sharing systems that are already operational. Until such measures are adopted, prominent criminals will continue to evade detection, illegal trade will persist and species numbers will continue to decline.

## Targeting Key Criminals

The primary objective of any criminal intelligence system or group of systems should be to contribute to the prevention and detection of a crime. They must therefore impact upon the individuals committing that crime.

*Below:  
An anti-poaching officer  
in Zambia's  
South Luangwa  
National Park*



**Wildlife crime holds vital intelligence that could positively contribute to efforts to tackle other forms of organised crime**

EIA supports the CITES Secretariat in its view that many of the current systems designed to record incidents of illegal trade are inefficient and do not contribute to effective intelligence-led enforcement or to a reduction in the number of offences. Furthermore, the "haphazard and incomplete"<sup>(6)</sup> methods in which data are submitted render them unreliable and ineffective. The Secretariat is now calling on Parties to review past practice and develop new approaches to reporting, storing and handling such information.

For instance, Parties may want to consider the introduction of a single, internationally coordinated database. Incorporating standardised methods of reporting and storing all data pertaining to wildlife crime, this would provide an effective alternative to the numerous databases currently in use. Intelligence could be shared amongst Parties, better enabling them to direct operational resources to target organised criminal syndicates.

## International Cooperation

International enforcement cooperation goes beyond simply exchanging intelligence. There are numerous international legal instruments available that could provide guidance to Parties and facilitate cross-border enforcement efforts, and which complement current initiatives under CITES. For example, the UNODC has launched a range of initiatives including a Border Liaison Office (BLO) programme. This promotes and supports development of interagency cooperation at both national and bilateral levels. Although largely focused on narcotics and human trafficking, CITES Parties should consider inviting the UNODC to assist in the establishment of BLO networks in key wildlife trafficking areas.

The 16th Session of the CCPCJ adopted language for a resolution which strongly encourages Member States to "cooperate at the bilateral, regional and international levels to prevent, combat and eradicate ... illicit international trafficking in forest products, including timber, wildlife and other forest biological resources".<sup>(7)</sup> In line with this, the CITES Secretariat should be supported and encouraged by Parties in its attempts to establish synergy with the Secretariat of the CCPCJ under this proposed resolution.

The ASEAN-WEN initiative has been embraced by relevant governments and appears to be progressing, with discussions on how to engage China. Similar regional agreements could be considered through, for example, the South Asian Association for Regional Cooperation (SAARC).

Other international legal instruments available to Parties include the UNTOC, the UNCAC and Mutual Legal Assistance Treaties (MLATs).

## Measuring Performance

In order to accurately measure successes and identify areas for development, enforcement agencies need to establish clear performance indicators. Standard indicators are already used by numerous law enforcement agencies, including wildlife authorities operating under the aegis of CITES' MIKE (Monitoring the Illegal Killing of Elephants) programme.<sup>(8)</sup> Existing indicators include: the number of intelligence packages executed, total patrol hours, offences detected, rates of arrest and conviction, seizure rates, and training programmes conducted. Time-bound performance targets should be set and assessed on a regular basis. Agency performance should be compared between regions to identify failings and allow for the adoption of best-practice.

## Linking Wildlife Crime to Other Illicit Activities

"Illicit international trafficking in forest products, including timber, wildlife and other forest biological resources, is often perpetrated by individuals and groups, including organized criminal groups that may operate transnationally and that may also be engaged in other illicit activities...".<sup>(9)</sup>

There are many, often anecdotal, accounts of wildlife crime's links to other forms of organised crime, such as drug smuggling and human trafficking. In some cases, the primary intent of the offender is misinterpreted, such as when natural products are used to conceal narcotics. Such accounts are frequently accompanied by statements that refer to the comparative global value of wildlife trade. The CITES Secretariat has asserted that these statements are of limited value in terms of eliciting support from policy-makers on the issue.<sup>(10)</sup>

Nonetheless, sufficient circumstantial evidence and growing political concern does exist to warrant further research into any existent links. It is possible that wildlife crime holds vital intelligence that could positively contribute to efforts to tackle other forms of organised crime. Further research is also necessary to assess and understand the extent of its negative socioeconomic impacts and develop strategies to mitigate them.

# Illegal Ivory Trade: The Case of the Singapore Seizure

In June 2002, over six tonnes of ivory was seized on board a ship arriving in Singapore. The seizure, which disrupted one of the world's most lucrative ivory syndicates, resulted from the coordinated efforts of national enforcement agencies from Zambia, Malawi and Singapore, as well the multilateral Lusaka Agreement Task Force.

The infamous Singapore seizure succinctly illustrates many of the concerns set out in this briefing. Despite initial high levels of interagency cooperation, the recovery of substantial evidence and numerous investigations by a range of national and intergovernmental agencies, the case has continued to founder. There have been no significant prosecutions to date and the syndicate responsible remains free to operate with impunity.<sup>(11)</sup>

## Illegal ivory trade and Transnational Organised Crime

“Large-scale ivory seizures are indicative of greater involvement of organised crime in the illegal ivory trade.”<sup>(12)</sup>

Investigations into the Singapore case revealed a well established syndicate comprised of Southeast Asian and African nationals, operating across at least five borders and spanning two continents. Recovered documentation showed that the syndicate had been active for at least eight years, having

dispatched 19 similar sized shipments since 1994. Such a formidable record of activity represents literally thousands of poached elephants and black market ivory worth hundreds of millions of dollars.

Sourced largely from elephants in Zambia, the ivory was transported to Malawi for packing before being taken by road to Mozambique. From there it was shipped to South Africa, and on to Japan via Singapore. The modus operandi employed to avoid detection included the use of personal and company pseudonyms, mis-declaring goods, bribing customs officials, fake documentation and multiple transshipments.<sup>(13)</sup>

## Sustainable Development Undermined

The seventh MDG links environmental sustainability with sustainable development and poverty reduction.<sup>(14)</sup> Illegal ivory trade undermines this goal by fuelling elephant poaching in developing countries, amounting to the theft of natural resources worth millions of dollars by international criminal gangs. For example, much of the ivory procured by the Singapore syndicate came from Zambia's South Luangwa National Park (SLNP).<sup>(11)</sup> Besides damaging an area's ecological biodiversity, poaching on such a scale poses a threat to Zambia's budding tourism industry. The Luangwa Valley is home to one of Africa's most important elephant populations and the park constitutes a vitally lucrative tourist destination.<sup>(15)</sup>



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*Left: High levels of elephant poaching places a strain on resource-strapped wildlife enforcement agencies*





As in many developing African countries, wildlife tourism makes a crucial contribution to national GDP (gross domestic product) and has been identified as having the potential to further assist economic development.<sup>(16)</sup> Although community involvement is still relatively marginal, wildlife tourism provides crucial employment opportunities for local people in rural areas, as well as facilitating the development of regional infrastructure. Sustained poaching serves to negate such activities, stifling attempts to stimulate much needed economic growth.

**The CITES Secretariat has identified a clear correlation between levels of corruption and illegal killing in both African and Asian elephant Range States**

The intensive poaching required to supply ivory syndicates also places a strain on the resource-strapped wildlife authorities tasked with protecting Africa's national parks. Anti-poaching patrols are generally ill-equipped, and the proliferation of small arms across Africa caused by numerous civil conflicts means that such patrols increasingly encounter heavily armed poachers. Injury, and even death, during such confrontations is not uncommon.

Poaching must be treated seriously and poachers held responsible for their actions. However, those recruited by lucrative transnational ivory syndicates typically hail from

the poorest sections of society. Access to income generating activities is extremely limited, making them vulnerable to exploitation at the hands of unscrupulous criminal networks. Paid just a few dollars to place their lives in considerable danger, their situation presents a bleak contrast to the riches enjoyed by those operating in the upper echelons of the trade. Moreover, it is usually the poachers and those at the lower end of the supply chain who are caught, while the individuals driving the networks evade detection.

### Corruption and Cover Up

Illegal ivory trade frequently encompasses incidents of corrupt practice, negating national and international efforts to stamp it out. Examples of this abound. A poacher apprehended in SLNP in 2001 revealed that he had been contracted by the warden of the park to poach 100 elephants in order to supply ivory to the Singapore syndicate. Rather than being investigated, the warden was simply transferred to another region.<sup>(13)</sup> In 2005, an elephant poacher in Tanzania alleged that he had been recruited and supplied with firearms by a former game-ranger acting at the behest of senior members of government and their counterparts abroad. The ivory he acquired was periodically transported to the capital in government vehicles, passing unhindered through numerous police roadblocks.<sup>(17)</sup>

Under its MIKE program, the CITES Secretariat has identified a clear correlation between levels

*Above:  
The Singapore  
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of corruption and illegal killing in both African and Asian elephant Range States. It has also noted that more elephant carcasses are reported where corruption is lower.<sup>(18)</sup>

## Enforcement and Judicial Failures

As the case of the Singapore seizure shows, those orchestrating international ivory syndicates are rarely brought to justice, reinforcing perceptions of illegal trade as a low risk - high return enterprise. The only way this status quo can be inverted is with high level political commitment, stringent and unambiguous legislation, and blanket application of intelligence-led enforcement, coordinated across national and international boundaries.

### Illegal ivory trade amounts to the theft of natural resources worth millions of dollars by international criminal gangs

The case also demonstrates a familiar lack of awareness amongst enforcement agencies and the judiciary regarding legislation and case jurisdiction. For example, all the investigating parties initially maintained that the seized ivory needed to be present in court in order to prosecute the case. This argument has been cited as a major cause of delay, as well as leading to an undue level of emphasis being placed on the DNA analysis of the ivory in terms of sovereign ownership and repatriation.

However, a senior representative from the Zambian judiciary has recently refuted this assertion and outlined a number of alternatives which would satisfy the requirements of the courts.<sup>(19)</sup> Such a disparity of knowledge reflects a lack of communication amongst relevant agencies at both national and international levels, despite the coordinating efforts of LATF and Interpol.

Protracted investigations and inefficient use of intelligence have also contributed to the foundering of the case. Five years have passed since the consignment was apprehended. The whereabouts of key suspects and witnesses alike are now unknown and many of the original people investigating the case have moved on. Additional delays have been attributed to the theft of vital evidence in Zambia, although replacement copies of the stolen documents have now been provided to the relevant agencies by a third party.<sup>(16)</sup>

The problems outlined above have been galvanised by a distinct absence of political will to prosecute those responsible. Until wildlife crime is taken seriously by governments and viewed on a par with other forms of serious transnational organised crime, the plunder will continue, damaging biodiversity, threatening species with extinction, stealing from local and national economies, perpetuating corruption and undermining global efforts towards sustainable development.



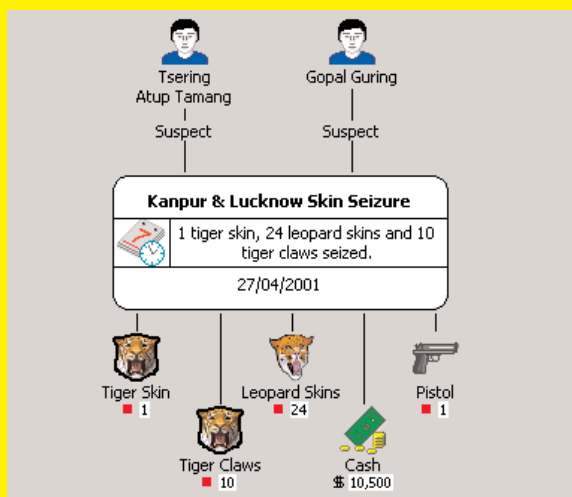
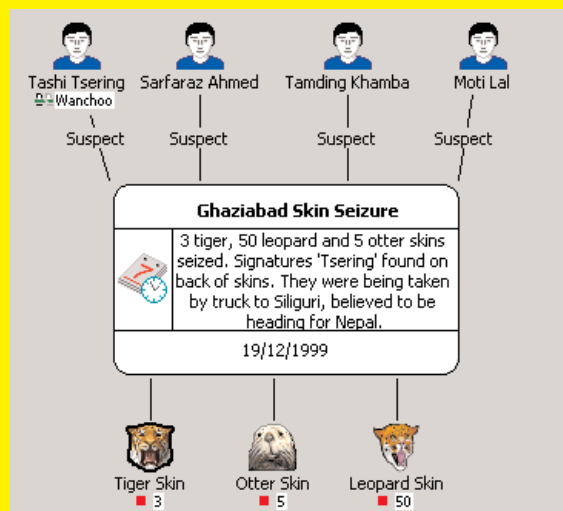
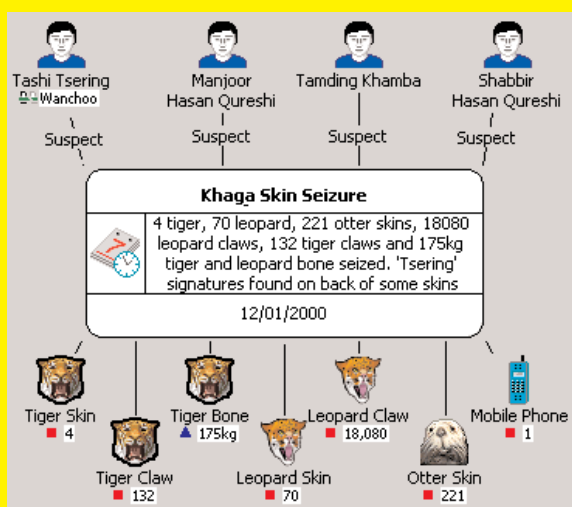
*Left: A keystone species, elephants are vital to maintaining biodiversity as well as constituting a lucrative tourist attraction for developing countries*

# Driving Enforcement through Intelligence

Skin Trade

Shown on these pages is a case study based on four seizures across northern India<sup>(20)</sup> over a three year period, illustrating the importance of intelligence-led enforcement. The seizures, which include the largest ever seizure of big cat skins in India, resulted in a vast amount of intelligence from a range of sources, including crime scenes, prisoners, physical evidence and surveillance. The intelligence is available for analysis in police, forest and court case records.

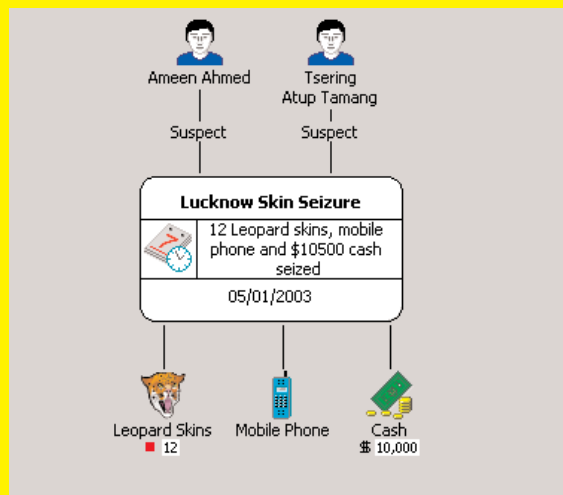
The gathering, analysis and dissemination of intelligence managed by a single, centralised, multi-agency unit should be the driving force behind any enforcement strategy, so as to direct valuable operational resources against the most significant individuals and cause the greatest disruption to organised criminal networks.



Effective intelligence-led enforcement is the key to combating organised crime. Reactive seizures and arrests are regularly made by a variety of enforcement agencies. Such events generate an abundance of opportunities to explore valuable sources of information.

Raids upon premises and the arrests of individuals are often only the start of many weeks and sometimes months of painstaking investigation, requiring great attention to detail. The prosecution of a criminal is not over until a successful conviction is made.

In addition to the information of immediate evidential value to the prosecution of a case, all of the information gained should be subjected to a degree of analysis in order to convert it from raw data into intelligence. This can be broken down into that which is of historical value, immediately actionable, or requiring further development.







# CITES and Illegal Logging: The Ramin Case

Illegal logging is one of the world's most profitable environmental crimes, with an estimated annual global value of US\$15 billion.<sup>(21)</sup> The sheer scale of illegal logging, coupled with the devastating impacts on ecosystems and forest communities, has led to high level political commitment to tackle timber theft.

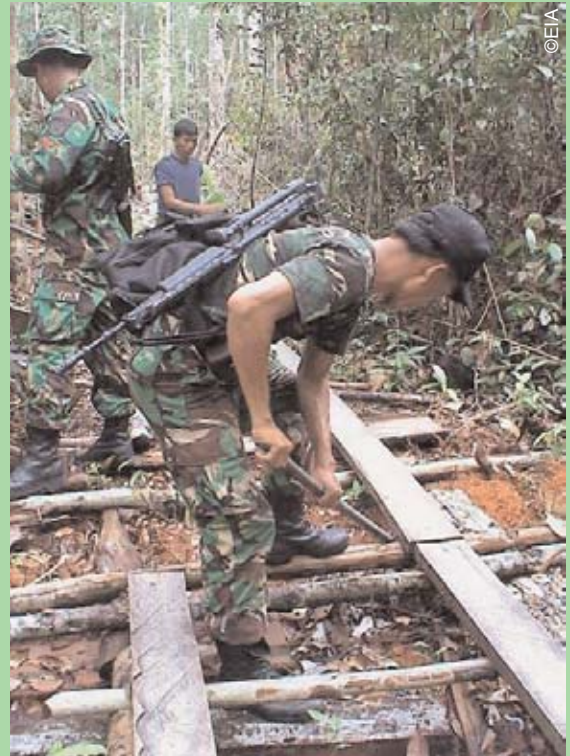
Despite such commitment, enforcement efforts continue to be undermined by a lack of adequate legal instruments and an absence of effective legislation. For instance, Indonesia has banned the export of both round logs and rough sawn timber. However, the failure of the majority of timber consuming countries to implement legislation outlawing the import of illegally sourced wood means that if illicit shipments reach international waters, the contraband effectively becomes legal and can enter almost any port around the world without hindrance.

**Enforcement efforts continue to be undermined by a lack of adequate legal instruments and an absence of effective legislation**

In light of this situation, CITES remains one of the few enforcement tools capable of compelling the interdiction of illegal timber trade by providing a clear legal basis for Parties to seize shipments of CITES-listed species entering their territory. On the other hand, in terms of combating illegal logging, CITES is constrained by its limited application to listed timber species, which represent a mere fraction of the overall illicit global trade. A wider use of Appendix III to cover more species of commercial timber would be one way to help overcome this downfall.

## Legislation Undermined

In 2001, the government of Indonesia, suffering from an illegal logging rate of around 80% and a deforestation rate of over two million hectares a year, placed ramin (*Gonystylus spp.*) on Appendix III of CITES.<sup>(22)</sup> Indonesia declared the listing an emergency measure and requested international assistance with its enforcement. In spite of this, Malaysia - also a Ramin Range State - lodged an official reservation for ramin parts and products, seriously undermining attempts to control illicit trade. Just a few days after the Appendix III listing (with a zero quota for Indonesia) came into force, EIA documented Indonesian ramin entering two ports in Malaysia in clear breach of CITES.<sup>(23)</sup>



Two years later, EIA uncovered a smuggling syndicate operating at the Malaysian port of Pasir Gudang, an international Free Trade Zone (FTZ). The syndicate was transshipping some 4500 cubic metres of illegal Indonesian ramin to China every month.<sup>(24)</sup> Malaysian enforcement authorities subsequently seized over 2000 cubic metres of the illicit timber. However, due to a loophole in Malaysian law which exempts FTZs from CITES regulations, the timber was released and allowed to proceed to its final destinations.

Despite such transgressions, the Appendix III listing did assist in reducing the amount of ramin illegally felled in Indonesia by placing pressure on consumer market countries to act. Significant seizures were made in the UK, USA and Singapore and, following the Pasir Gudang case, the Malaysian government altered its customs regulations to allow seizure of illegal CITES-listed species in FTZs. However, the effectiveness of the CITES listing was undermined by the low priority generally accorded to species listed under Appendix III. Partly in response to this, at the following CoP in 2004, Indonesia proposed to uplist ramin to Appendix II. The proposal was adopted unanimously, the first time a commercial timber species had been uplisted without a vote.

Nonetheless, illegal trade in ramin persists, with Malaysia continuing to play a central role. In February 2006, EIA discovered that a Chinese manufacturing company was obtaining rough sawn ramin from a firm based in Sarawak,

*Above Right: Anti-illegal logging operation, Tanjung Puting National Park, Indonesia. The CITES listing has reduced the illegal felling of ramin in the country*





Malaysia. The Chinese company openly admitted that the ramin had originated in Indonesia, was smuggled into Sarawak and provided with CITES papers for export to China.<sup>(25)</sup> EIA investigators also documented 12 tonnes of illegal Indonesian sawn ramin stored in a warehouse in Port Klang, Peninsular Malaysia, awaiting onward shipment to markets in Europe and Asia.<sup>(26)</sup>

### **CITES remains one of the few enforcement tools capable of compelling the interdiction of illegal timber trade**

In the same year, Malaysia set an export quota for ramin of 45000 cubic metres, a volume greater than that which could be sustainably logged from within the country.<sup>(27)</sup> Such an excessive quota is clearly based on an inaccurate Non-Detriment Finding and provides a cover for illegal ramin smuggled into the country from Indonesia. Serious concerns over Malaysia's ramin export quota were raised at the 54th CITES Standing Committee meeting in 2006. Here the CITES Secretariat judged the threat to ramin to be so severe that it could merit an Appendix I listing.<sup>(28)</sup> Further concerns over Malaysia's inflated export quota were raised by the EU's Scientific Review Group. At a meeting held in March 2007, the group's deliberations led to a suspension of imports of Malaysian ramin into the EU.<sup>(29)</sup>

Overall, listing ramin under CITES has contributed to a reduction in levels of illegal extraction of the species, especially in Indonesia. Imports by major consumer markets such as the EU and USA have fallen steadily. Logging in protected areas of Indonesia, such as the Tanjung Puting National Park, has also declined. Yet progress has been hindered by a succession of enforcement weaknesses and the failure of Malaysia to take the necessary measures to protect the species.

### **Closing the Loopholes**

Possible measures to improve timber-related enforcement should include greater scrutiny of Non-Detriment Findings and, in relation to timber listed on Appendix II, restricting exports to independently-certified wood. In terms of ramin, Indonesia's export quota of 8800 cubic metres is certified independently under Forest Stewardship Council regulations. None of Malaysia's ramin exports are independently certified.

The example of ramin clearly shows that CITES has an important role to play in efforts to curb illegal logging, but also reveals significant problems when it comes to enforcing a listing. Until such legislative and enforcement loopholes are plugged, they will continue to be exploited by criminal networks, undermining the Convention and posing a persistent threat to our global environment.

*Above:  
By 2001,  
Indonesia was  
suffering an  
illegal logging  
rate of 80%*

*Left:  
12 tonnes of  
illegal  
Indonesian  
ramin stored at  
a warehouse in  
Malaysia,  
May 2006*

*Far Left:  
Illegal  
Indonesian  
ramin seized in  
Singapore,  
October 2002*





## Conclusions

- Environmental crime, including the illegal trade in endangered species, is a form of serious organised crime. Controlled by powerful individuals through established criminal networks operating within and across multiple borders, such sophisticated criminal activity requires an equally sophisticated enforcement response.
- Environmental crime has a disproportionately negative impact on the most marginalised sections of society and is recognised as undermining sustainable development. It frequently goes hand in hand with corrupt practice and bad governance, which in turn facilitates further illicit abuse of natural resources for personal gain.
- There is wide recognition amongst Parties to CITES that effective enforcement efforts are lacking. The mechanisms available to Parties are not being fully utilised, hampering the potential enforcement capabilities of the Convention. In order to tackle environmental crime effectively, it is imperative for Parties to make use of all available mechanisms and to implement strategies of proactive, coordinated and intelligence-led enforcement through specialised units.
- There are a number of other multilateral legal instruments available to Parties which complement current enforcement initiatives under CITES. The development of formal synergies would positively contribute to coordinated enforcement efforts and provide models upon which new initiatives could be based.
- Sufficient evidence exists of links between environmental crime and other forms of serious organised crime to warrant a detailed study to assess such links and establish the true economic value of environmental crime, as well as its socioeconomic impacts.

*This briefing was written by Debbie Banks, Justin Gosling, Julian Newman, Rachel Noble & Mary Rice, June 2007.*

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