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agency

Wildlife

Out of Africa

How West and Central Africa have become the epicentre of ivory and pangolin scale trafficking to Asia

December 2020





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ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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Above: Numbering far fewer than African Savannah elephants, forest elephant populations in WCA have significantly declined and continue to be threatened by poaching

Front cover ©EIAimage

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Summary

The coronavirus pandemic of 2020 saw the world come to a virtual standstill, with global lockdowns disrupting or halting transport and trade routes and travel. The hopes that illegal wildlife trade activities would also be disrupted or halted were largely misplaced – as millions of people worldwide adapted and started working from home, so too did the traffickers.

Over the past decade, we have seen a shift of focus as organised criminal networks involved in illegal wildlife trafficking from the continent of Africa to markets in East and South-East Asia have further turned their attention from East and Southern Africa to West and Central Africa, moving their operations to both source and export increasing quantities of illegal wildlife.

Based on ongoing EIA investigations, this report presents a brief analysis of these two regions and provides an overview of the ongoing activities of the networks operating in them. Through engagement with illegal traffickers and traders operating out of Nigeria and beyond, details and documents shared with investigators reveal how they exploit the existing

status quo of the region, which has a wealth of natural resources but is faced with a number of challenges – pockets of civil unrest, high levels of poverty and weak rule of law, all underpinned by corruption.

Much has been made of Nigeria's role in the illegal wildlife trade; in 2015, the country emerged as the primary exit point for illegal wildlife, implicated in the seizures of more than 30 tonnes of ivory and 167 tonnes of pangolin scales. But this is not Nigeria's problem alone; the sheer scale and volume of the illegal wildlife trade makes this a regional issue, as evidenced by the severe decline of elephant and pangolin populations in neighbouring countries and local extinctions of certain elephant populations.

The wildlife is largely sourced from other countries in the region, including Cameroon, Gabon, the Central

African Republic and the Democratic Republic of Congo, and involve multi-national organised criminal groups operating throughout Africa. These groups exploit the services of major maritime shipping and air transport companies to move their illicit cargo and include shipping agents and freight forwarders, who have established safe passage through the payment of bribes to customs and other government officials.

There is no silver bullet or 'one size fits all' approach to tackling the illegal wildlife trade and other issues facing the region but there are certain actions which can and should be immediately implemented to address the fundamental drivers of ivory and pangolin trafficking in the region.

Above: Much has been made of West and Central Africa's role in the illegal wildlife trade: since 2015, the region has become the primary exit point for illegal wildlife products especially ivory and pangolin scales



Above: Raw ivory offered by traders in Nigeria.

Introduction

West and Central Africa are now major sourcing and export hubs for the illegal trafficking of elephant ivory (“ivory”) and pangolin scales to Asia.

Its weak governance systems and transportation networks have been hijacked by transnational criminal networks who have chosen countries such as Nigeria, Cameroon and the Democratic Republic of Congo (DR Congo) in which to base their operations and organise the high-volume trafficking of ivory and pangolin scales to East Asian and South-East Asian countries such as China and Vietnam.

Nigeria and DR Congo are affected by some of the highest levels of organised crime on the African continent.¹ Along with Cameroon, the three countries have well-established criminal networks which are involved in various trafficking activities; these include not only wildlife but also humans, drugs, minerals, timber and weapons.



Above: Pangolin scales smuggled out from Nigeria

Criminal networks operating in West and Central Africa’s export hubs extend across a swathe of the region’s tropical rainforests and savannas and present sustained threats to populations of the region’s last strongholds of Africa’s elephants and its three species of pangolin (white- and black bellied and giant ground pangolins). Ivory and pangolin scale smuggling routes involve a string of countries, including Gabon, the Republic of Congo, the Central African Republic, Liberia, Cote d’Ivoire and Benin.

The criminals involved in wildlife trafficking seek out operational environments that are well connected to consumer markets and present minimal law

enforcement risks.² West and Central Africa’s porous borders, endemic corruption, weak or absent rule of law, low human development and hotspots of armed conflict make the region exceptionally vulnerable to the activities of wildlife trafficking networks.

Growing economic integration including road, air and maritime transportation infrastructure development facilitate the means by which wildlife can be exported to Asia. Indeed, Nigeria stands out in the region (and the continent) as one of the ‘Big Five’ economies in Africa, projected to be the fastest-growing economy in Africa by 2050.^{3,4} Yet this is in stark contrast to widespread corruption, poor institutional frameworks and weak

governance which undermine economic growth, foster inequity and facilitate crime.

Many countries in West and Central Africa display low levels of resilience in their response to organised crime, measured by closely related benchmarks such as political leadership, government transparency and accountability and the freedom of civil society, local communities and independent media to raise the alarm against criminality and corruption.⁵ Cameroon, DR Congo, Gabon, Nigeria and the Republic of Congo have been flagged for rampant corruption, lack of government accountability and increasing repression of civil society and the media,⁶ all of which undermine the response to wildlife crime.

Wildlife trafficking is not a new phenomenon in West and Central Africa. The region has had well established commercial domestic markets for ivory⁷ and other wildlife products such as bushmeat⁸ for centuries and, during colonial times, massive numbers of elephants were poached to supply ivory to the West.⁹

More recently, national-level wildlife trafficking networks have supplied urban consumers with millions of tonnes of bushmeat every year, driving a wave of biodiversity loss.¹⁰ It is these same networks which are being co-opted to supply the enormous quantities of pangolin scales and ivory entering the international illegal trade to Asia.¹¹ At a time when the world is grappling with the crippling impacts of the ongoing coronavirus pandemic, such high-volume trade in wildlife and, indeed, any legal or illegal wildlife trade also poses a serious risk for the spread of zoonotic diseases such as COVID-19.

Twenty years ago, EIA investigations in West and Central Africa exposed an increase in poaching in the region and highlighted the role of Cameroon as an important conduit for ivory trafficking.¹² In this report, EIA exposes how traffickers from the supply side in Africa and demand side in Asia cooperate to traffic enormous quantities of ivory and pangolin scales.

EIA has identified Nigeria as a key country in the consolidation, packing, sale and export of high volumes of ivory and pangolin scales, sourced largely from outside the country from neighbours throughout West and Central Africa. Traders in Lagos are sourcing illicit wildlife products from suppliers in Cameroon and selling to customers in Nigeria and abroad, predominantly Vietnamese and Chinese buyers. They offer services as 'clearing agents' working with corrupt Government officials, particularly in the customs departments of specific sea and air ports, to export ivory and pangolin scales in staggering quantities which continue to leave the shores of Nigeria undetected, destined for Asian markets. These operations are highly organised and sophisticated, spanning multiple jurisdictions and not only violate wildlife or environmental protection laws, but also other laws related to organised crime, including conspiracy, money laundering, customs fraud and corruption.



Top: Live pangolins for sale at a Lagos market

Above: Nigeria Customs seized 8,492kg pangolin scales in March 2018 – yet pangolins scales several times that quantity are illegally exported from Nigeria undetected each year

There is also a high level of convergence between ivory and pangolin trafficking and the timber trade, with some individuals trading in both wildlife and timber products; timber also serves as a method of concealment for ivory and pangolin trafficking.

This report reveals that the last remaining elephant and pangolin populations of West and Central Africa are under severe attack by organised crime networks. The recommendations presented here need to be implemented as a matter of urgency.



At risk: Status of pangolins and elephants in West and Central Africa

Elephants and pangolins found in West and Central Africa are threatened throughout their range from high levels of poaching and trafficking.

Three of the four species of African pangolin (all but ground pangolin, *Smutsia temminckii*) inhabit areas of West and Central Africa. While exact pangolin population figures are unavailable, all pangolin species found in this region are threatened with extinction and are classified as either Endangered or Vulnerable on the IUCN Red List. IUCN updated the conservation status of three pangolin species in 2019 under which the white-bellied pangolin (*Phataginus tricuspis*) and giant pangolin (*Smutsia gigantea*) have been categorised as Endangered due to continuous poaching and trade as well as forest loss in West and Central Africa.¹³

The most recent comprehensive population survey of elephants in West and Central Africa was conducted in 2016. Results indicate that populations in West Africa are particularly vulnerable to local extinctions due to herds being mostly small, fragmented and isolated. Populations in Central Africa have been severely affected by ivory poaching since at least 2003, and regionally, at least two populations have been recorded

as lost in DR Congo and Chad.¹⁴ Data indicates that a significant proportion of ivory trafficked globally is sourced from elephants in West and Central Africa, mainly from forest elephant populations.¹⁵ EIA intelligence also shows that Gabon and the Republic of Congo, home to the region's largest forest elephant populations, are sources of ivory entering the illegal trade to Asia.

According to the latest data submitted to CITES, the four Central African nations of Cameroon, the Republic of Congo, DR Congo and Gabon continue to be major sources of ivory in a sub-region where elephant populations have experienced major declines. These countries exhibited the highest continental proportion of illegally killed elephants (PIKE) values for 2017 in the whole of Africa.¹⁶

Above: Forest elephants are under severe threat due to the high levels of poaching in Western and Central Africa in recent years

Elephant populations of West and Central Africa

NIGERIA

Despite a ban on ivory sales in Lagos, a flourishing market was reported as recently as 2017. However, with a small estimated domestic population of 94 elephants, it is unlikely that ivory sold in Nigeria is sourced from its own elephant population, although poaching has been recorded in Yankari National Park, the only relatively well-protected population in Nigeria. Five elephant populations have been reported as lost.¹⁴

GABON

Gabon has the largest population of forest elephants, with a population of 7,058.¹⁴ Gabon is a major source for ivory, with an estimated 80 per cent of the ivory poached in Gabon crossing into Cameroon.¹⁹ In the past decade, approximately 30 per cent of Gabon's elephants have been killed, with up to a dozen elephants shot by poachers every day.²⁰

The Minkébé National Park is an elephant poaching hotspot losing more than 80 per cent of its population to poachers between 2004-14. The park is also believed to be a prominent pangolin poaching site.²⁰

CAMEROON

Due to poaching, Cameroon's forest elephant population has suffered a 70 per cent decline, falling from approximately 21,000 in 2010 to 6,400 in 2015 and the cross-border protected area between Cameroon, the Republic of Congo and Gabon, known as the TRIDOM area, is a hotspot for elephant poaching.¹⁷

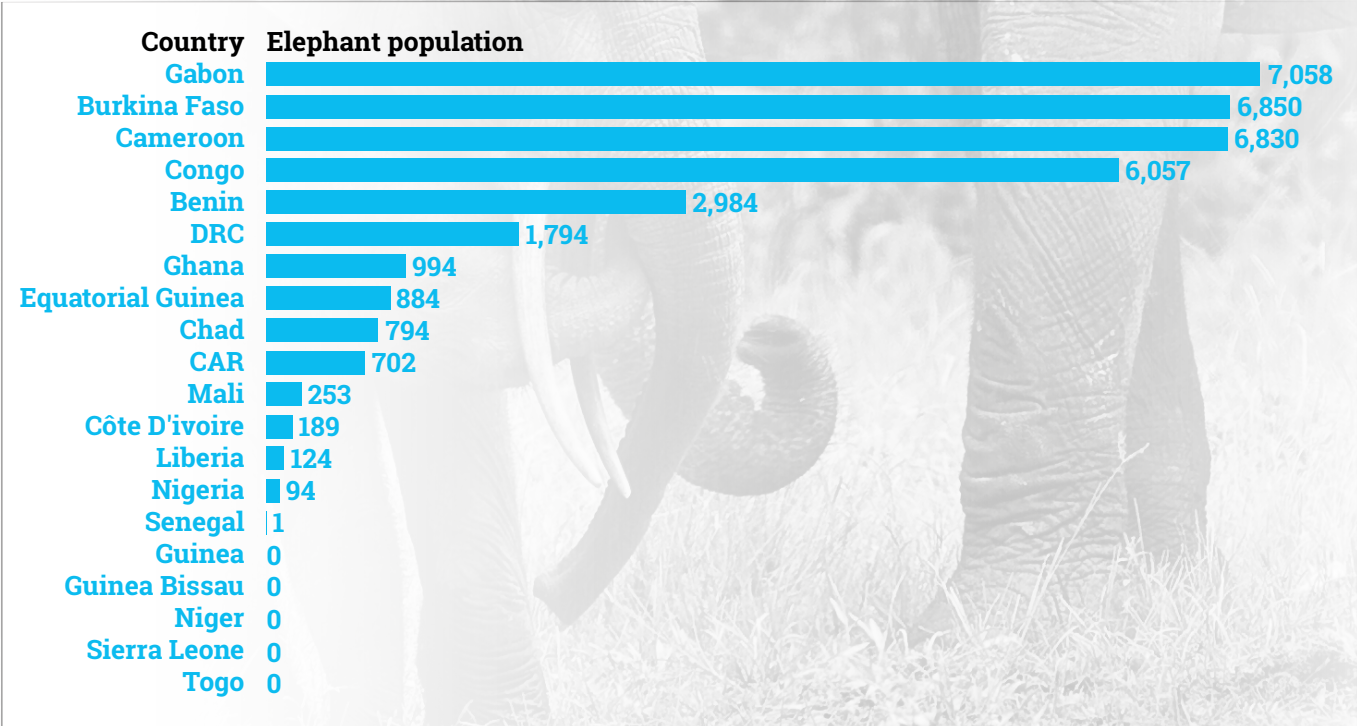
Domestic ivory trade is permitted in Cameroon and it is possible to apply for a permit to work ivory and/or trade in ivory and its products.¹⁸

OTHER COUNTRIES

Intelligence indicates that the Central African Republic, DR Congo and the Republic of Congo are also source countries in the regional illegal ivory trade, further threatening already vulnerable populations in the region.

In 2017, an aerial survey suggested that the northern elephant population of the Central African Republic may be locally extinct due to pressure from poaching, further exacerbated by civil war.²¹ While the Republic of Congo is home to the second largest forest elephant population (after Gabon), with approximately 6,057 elephants, its domestic population is increasingly threatened by poaching to feed the ivory trade in the region. The elephant population in DR Congo, which latest estimates put at 1,794, has similarly suffered a decline, most notably in the past decade as a result of intense poaching pressure from different groups, including the Lord's Resistance Army.¹⁴

Figure 1: Poaching is one of the primary reasons for the local extinction of certain elephant populations in West and Central Africa. Urgent improvements in law enforcement and investment in conservation is vital for the survival of the last remaining wild populations in this region



Pangolin populations of West and Central Africa

Information regarding pangolin populations is largely unavailable, mainly due to a lack of field surveys and the detectability of pangolins in their habitat. A scoping study conducted by USAID's West Africa Biodiversity and Climate Change program has provided more information on the pangolin population status in West and Central Africa:²²

	White-bellied pangolin (<i>Phataginus tricuspis</i>)	Giant pangolin (<i>Smutsia gigantea</i>)	Black-bellied pangolin (<i>Phataginus tetradactyla</i>)
IUCN Status	Endangered	Endangered	Vulnerable
Frequency of encountering	Most frequently encountered of all African pangolin species, both in the wild and in the bushmeat trade.	The second least frequently encountered African pangolin species. They are rarely seen in the bushmeat trade. ²³	The least frequently encountered of all the African pangolin species, both in the wild and in the bushmeat trade. ²⁴
Population ²⁵	All three pangolin populations in West and Central Africa are declining		
	Reported as 'uncommon' to 'abundant'	Many range states have reported that the species is extinct in the wild	The species is reported as 'rare' to 'not uncommon' in most range states, except for Guinea, Liberia and Côte d'Ivoire
	Abundant: Central Africa Reasonable and stable: The Upper Guinea forest countries (e.g., Guinea, Liberia, Côte d'Ivoire and Ghana) Least common: The Dahomey Gap countries ²⁶	Rare / uncommon: Guinea, Liberia, and Côte d'Ivoire Rarely encountered: Nigeria Locally extinct: Ghana, Benin and Togo	Common and stable: Central Africa Rarely encountered: Nigeria Completely absent: Dahomey Gap countries

Below: White-bellied pangolin (*Phataginus tricuspis*)



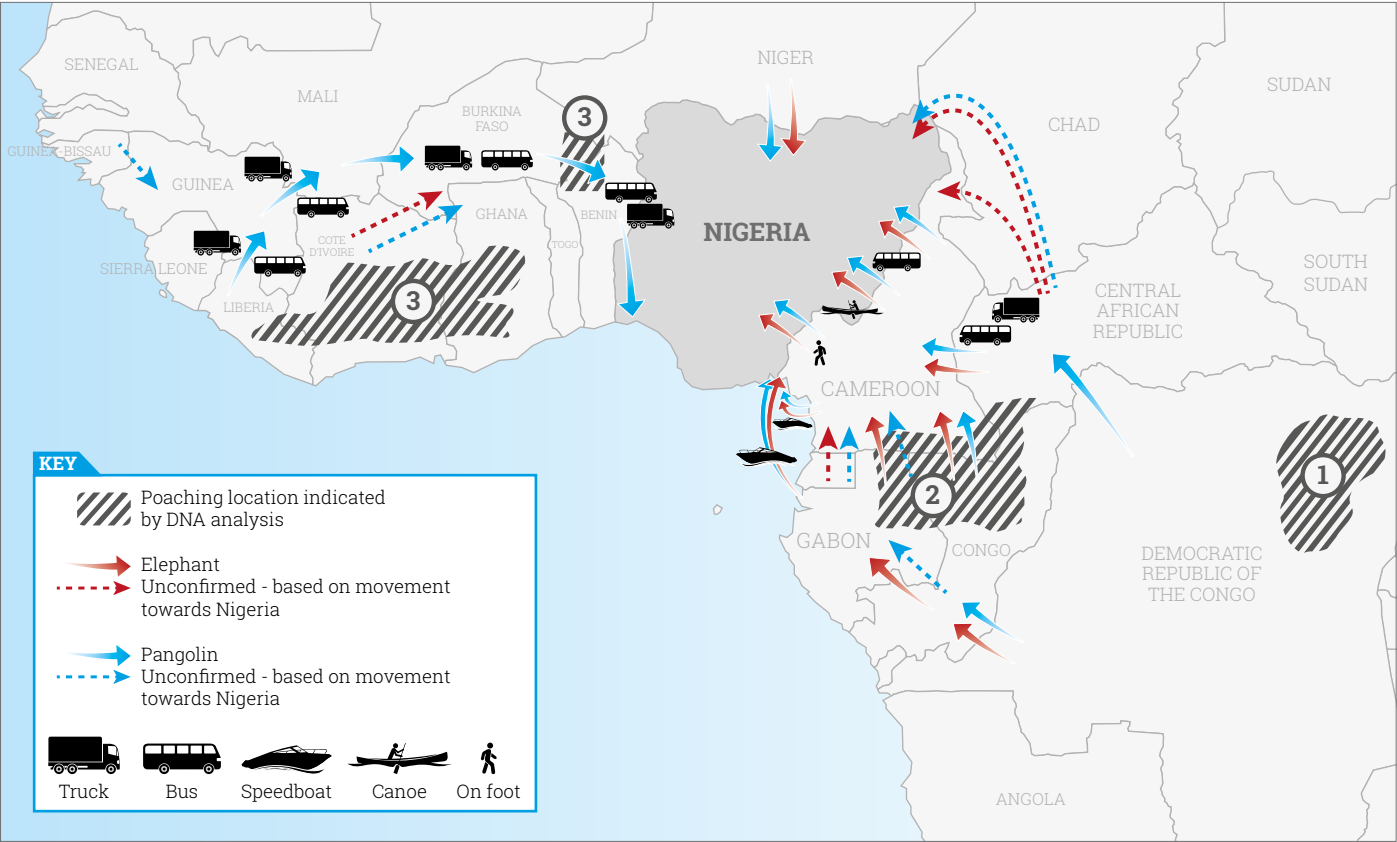
Below: Black-bellied pangolin (*Phataginus tetradactyla*)



All roads lead to Nigeria

Major elephant and pangolin trafficking hotspots in West and Central Africa

Figure 2: Map illustrating the sourcing routes and transit types of ivory and pangolin scales smuggled towards Nigeria based on EIA's seizure database and investigations from 2018 to 2020.



Below: At the height of the COVID-19 pandemic, trafficking continued as evidenced by the seizure of 626kg ivory in Cameroon on 22 October 2020



©Maha Ngalié, MINFOP (Ministry of Forestry and Fauna, Cameroon)

Below: DNA analysis of seized ivory can reveal poaching hotspots and criminal network behind multiple shipments of illegal tusks



©DWNP, Malaysia

Following the DNA trail: Sourcing ivory from the forest elephants of West and Central Africa

DNA analysis of large-scale ivory seizures (>500kg) between 1996 and 2014, conducted by researchers at the University of Washington, has confirmed that a significant portion of ivory trafficked globally is sourced from elephants in West and Central Africa, confirming that these elephant populations are at severe risk from poaching.¹⁵ The analysis found that:

- 1 the majority of African forest elephant ivory intercepted between 1996 and 2005 came from the eastern part of DR Congo;
- 2 since 2006, up to 93 per cent of forest elephant ivory seized globally came from the Tri-National Dja-Odzala-Minkébé (TRIDOM) region and the Dzanga Sangha Reserve in Central African Republic;
- 3 a smaller quantity of forest elephant ivory came from Burkina Faso, Benin, Ghana and the Republic of Côte d'Ivoire.

Another finding from the DNA analysis of tusks from large ivory seizures was that a pair of tusks from the same elephant was not necessarily smuggled in the same shipment; in one case, the pair were smuggled separately 10 months apart from the same initial location of export.²⁷ Such

compelling forensic evidence serves as a useful tool in disrupting wildlife trafficking networks; linking a wildlife criminal to multiple ivory seizures provides information which could help expand the scope of the investigation and ultimately secure strengthened prosecution outcomes and higher deterrent penalties.

Scientists are currently developing a DNA analysis system for pangolin scales which would determine the geographic origin and identification of pangolins seized and highlight poaching hotspots. This work complements ivory assignments because 25 per cent of all large seizures of pangolin scales are co-mingled with ivory.

The DNA analysis findings of large-scale ivory seizures are also corroborated by EIA investigations, which have found that ivory trafficked through West and Central Africa is largely from forest elephants, while African savanna elephant ivory is typically exported from ports in East/Southern Africa. Improvements in law enforcement efforts in countries such as Kenya, Uganda and Tanzania, combined with declining elephant populations in major poaching hotspots such as Mozambique, have almost certainly played a role in the displacement of ivory and pangolin trafficking networks to West and Central Africa.²⁸



©Royal Malaysian Customs



©EMILE KOUTON via Getty Images

Above left, in 2012, Royal Malaysian Customs seized 6,034kg ivory shipped from Togo; above right, 3,900kg ivory were seized in Togo in 2014. DNA analysis showed some of the tusks seized in Togo and Malaysia came from the same elephant population, suggesting that the same network may have been involved in exporting these large-scale shipments of ivory representing hundreds of dead elephants

Key African countries implicated in ivory and pangolin scales trafficking

This map flags the key export and destination hubs for ivory and pangolin trafficking from West and Central Africa to Asia, based on seizure data and intelligence gathered by EIA.²⁹ This includes countries which have seized ivory and pangolin scales, countries from which they were exported undetected only to be seized in another country and countries whose nationals are implicated in seizures.

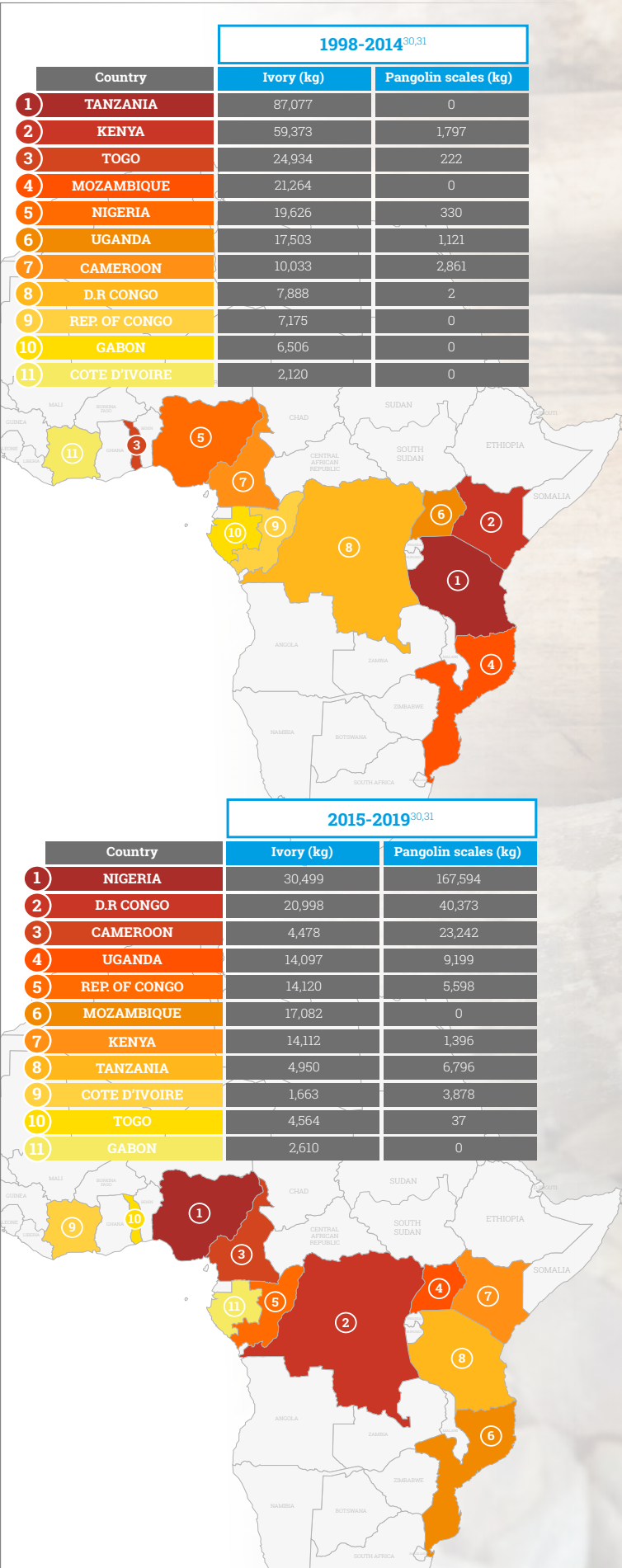
Below: The record seizure of 8,300kg pangolins scales and 2,100kg ivory in Hong Kong is just one of the many examples of the trafficking of such from Nigeria to Asia



Below: By air and by sea, in containers and in suitcases, pangolin scales and ivory are smuggled from West and Central Africa



Figure 3: A shift in the epicentre of illegal ivory and pangolins trade over the last decade, measured by the quantity of seized contrabands linked to each country



Out of Africa: Large scale transportation of ivory and pangolin scales

Since 2015, Nigeria has been the world's primary exit point for ivory and pangolin scales trafficked from Africa to Asia.³² During the past five years, the country has been implicated in more than 30 tonnes³³ of ivory and 167 tonnes of pangolin scales seized globally, the equivalent of at least 4,400 elephants and 167,000 pangolins.³⁴

Many seizures have involved ivory and pangolin scales in the same shipment, demonstrating a high level of convergence between these two illicit wildlife products. EIA has documented ivory and pangolin scale traffickers who are also involved in the trafficking of other wildlife commodities such as rhino horn, lion teeth, seahorses and shark fins, as well as illegal donkey skins and timber.

Throughout 2019 and 2020, EIA undercover investigations in West and Central Africa have provided remarkable insights as to how ivory and pangolin scales are being trafficked from across the region into Nigeria. Traffickers use buses or trucks from Liberia and the Central African Republic, speedboats from Gabon and Cameroon, canoes or simply walk across the Cameroon-Nigeria border to transport illicit wildlife products.

The Apapa Port Complex, Nigeria's largest port, is used by traffickers to export both ivory and pangolin scales. Concerns about enforcement in Lagos has meant traffickers are increasingly shifting their export operations to Port Harcourt and Onne Port. For air cargo, the main points of exit from Nigeria is the Murtala Muhammed International Airport in Lagos and, to some extent, the Mallam Aminu Kano International Airport in the northern state of Kano.

The port of Matadi is the main port in DR Congo for sea shipments of ivory and pangolin scales but it is too shallow for large ships, so containers are often transferred to larger ships at Pointe-Noire, the main port in the Republic of Congo, using feeder vessels.

China and Vietnam are the primary destination countries for ivory trafficked from Africa. With a ban on the legal trade in ivory in China, recent reports have indicated that since China's domestic ivory ban went into effect in 2018, Chinese consumers are now driving an expansion in demand for ivory by purchasing more ivory abroad in South-East and East Asian markets and smuggling the ivory back into China where it is used for 'gifting' or ornamental purposes.³⁵⁻³⁹ The majority of pangolin scales trafficked from Africa are destined for China, where they are consumed as medicinal products.

For ivory and pangolin scales trafficked to China and Vietnam, maritime shipments are sent from West and Central Africa with one or more stops en-route. At each stop, either 'transshipment' or 'transit' takes place. Transshipment takes place when the container is moved from one ship to another for onward transportation to Vietnam or China, without a customs check. Transit refers to containers being imported into the country, the contents repacked and then re-exported as a new shipment to the destination.⁴⁰ For both China and Vietnam, the top transshipment locations are Singapore and Malaysia. South Korea and Indonesia are also common transshipment countries. Vietnam and Hong Kong are frequent transit hubs for goods to China. In Vietnam, shipments are broken down into smaller batches to be smuggled into China overland.

Air freight is also used to transport ivory and pangolin scales to China and Vietnam, with transshipments taking place in the United Arab Emirates, Ethiopia or Turkey. To some extent, ivory is also smuggled to European countries; however, this is primarily in transit for onward transportation to Asian markets.³²

Documents shared with EIA investigators by traffickers reveal how they exploit the services of major international maritime shipping and air transport companies to move their illicit cargo. These include Maersk, Pacific International Lines, Ethiopian Airlines, Turkish Airlines and Emirates Airlines.



Case file

More than 25 tonnes of pangolin scales seized in Singapore in April 2019

In early April 2019, authorities in Singapore confiscated a staggering combined haul of 25.6 tonnes of pangolin scales in two seizures within just five days. The seized scales represent a total of approximately 38,000 pangolins and were on their way from Nigeria to Vietnam.

The first haul of 12.9 tonnes, which is the world's largest known seizure of pangolin scales to date, was discovered at the Pasir Panjang Export Inspection Station by the National Parks Board (NParks) and Singapore Customs on 3 April 2019. The scales were packed in 230 sacks hidden in a 40ft shipping container declared as containing "frozen beef". During the inspection, the authorities also seized 177kg of carved elephant ivory.

Five days later, on 8 April 2019, authorities including NParks, Singapore Customs and the Immigration and Checkpoints Authority (ICA) confiscated another shipment of 12.7 tonnes of pangolin scales packed in 474 sacks. Similarly, the scales were found in a 40ft container, which was declared as containing 'cassia seeds' originating from Nigeria, also destined for Vietnam.

At the time of writing, there is no publicly available information on the status of the investigation into these seizures. It is unknown, for example, whether the law enforcement authorities of Nigeria, Singapore and Vietnam have collaborated to conduct intelligence-led investigations into the companies and/or the individuals registered

as consignors and consignees on the paperwork related to the seized shipments.

The Singapore seizures of April 2020 demonstrate the catastrophic quantities of wildlife products being trafficked from Nigeria as well as the major role Vietnam is playing as a transit hub. In 2018 and 2019 alone, Vietnamese customs seized at least 22 tonnes of pangolin scales originating from Nigeria.³² During the same period, Hong Kong customs seized at least 20 tonnes of scales exported from Nigeria.

The huge quantities of pangolin scales seized on the Nigeria to Vietnam shipping route indicate there are significant vulnerabilities in the capability of law enforcement agencies to disrupt the trafficking networks operating between the two countries.



Above: Temminck's ground pangolin



Above: The 12.9 tonnes of scales seized on 3 April 2019 came from the white-bellied pangolin, the giant ground pangolin, the black-bellied pangolin, and Temminck's ground pangolin



Above: The 12.7 tonnes of scales seized on 8 April 2019 came from the white-bellied pangolin and the giant ground pangolin



Case file

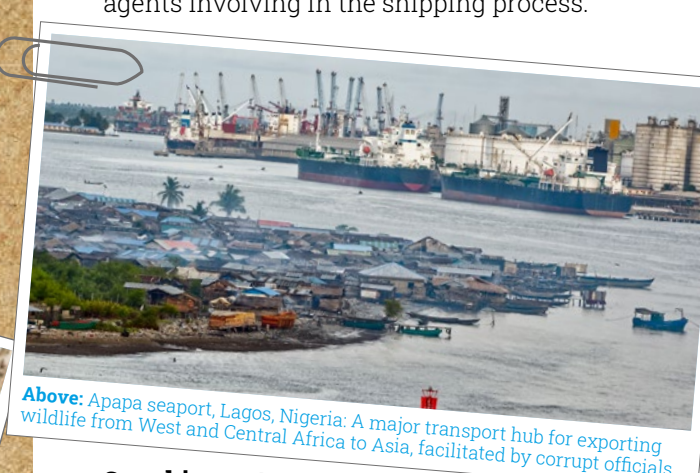
The role of shipping agents in illegal wildlife trade

Summary

EIA investigations have identified several networks trafficking wildlife from Nigeria to Asia, in which clearing agents play a critical role in enabling the trade. Mr X and Mr Y are two experienced shipping agents who specialise in offering 'clearing services' at specific export hubs in Nigeria. Mr X specialises in the sea route operating at Apapa seaport while Mr Y runs clearing services at Murtala Muhammed International Airport in Lagos. These agents are responsible for arranging the necessary paperwork and organising payments to relevant government officials and all the agents involving in the shipping process.



Role:	Shipping agents
Country of operation:	Nigeria
Type of contraband:	Ivory and pangolin scales



Above: Apapa seaport, Lagos, Nigeria: A major transport hub for exporting wildlife from West and Central Africa to Asia, facilitated by corrupt officials



Above: Customs officers of Noi Bai International Airport seized 193kg ivory and 805kg pangolin scales transported by air cargo originating from Nigeria to Vietnam in September 2018

Sea shipment

Mr X ships containers of illicit wildlife regularly from Apapa seaport to various destinations including Hong Kong, Malaysia, Singapore and Vietnam. Because of recent seizures, he only sends direct shipments to Malaysia and sends shipments destined for Hong Kong, Singapore and Vietnam to Malaysia first for transshipment or repacking. The Maersk and Cosco shipping lines are frequently used for transportation, which takes approximately six weeks for a shipment exported from Nigeria to arrive at a port in Vietnam.

Timber, cashew nuts and ginger are often used by Mr X to conceal ivory and pangolin scales for shipments to Asia. When timber is used as a concealment method, a 20ft container is the preferred option as it can hold up to five tonnes of contraband; for example, pangolin scales are often packed at the bottom, ivory in the middle and then pangolin scales again on top before being sealed shut. If customers want to clear between nine and 10 tonnes of goods, a 40ft container is recommended.

Mr X is willing to reduce the clearing fee he charges for frequent customers and has established multiple companies in Nigeria to register as consignors for his shipments. In order to avoid

detection, he uses each registered company for two or three shipments, after which they are dissolved

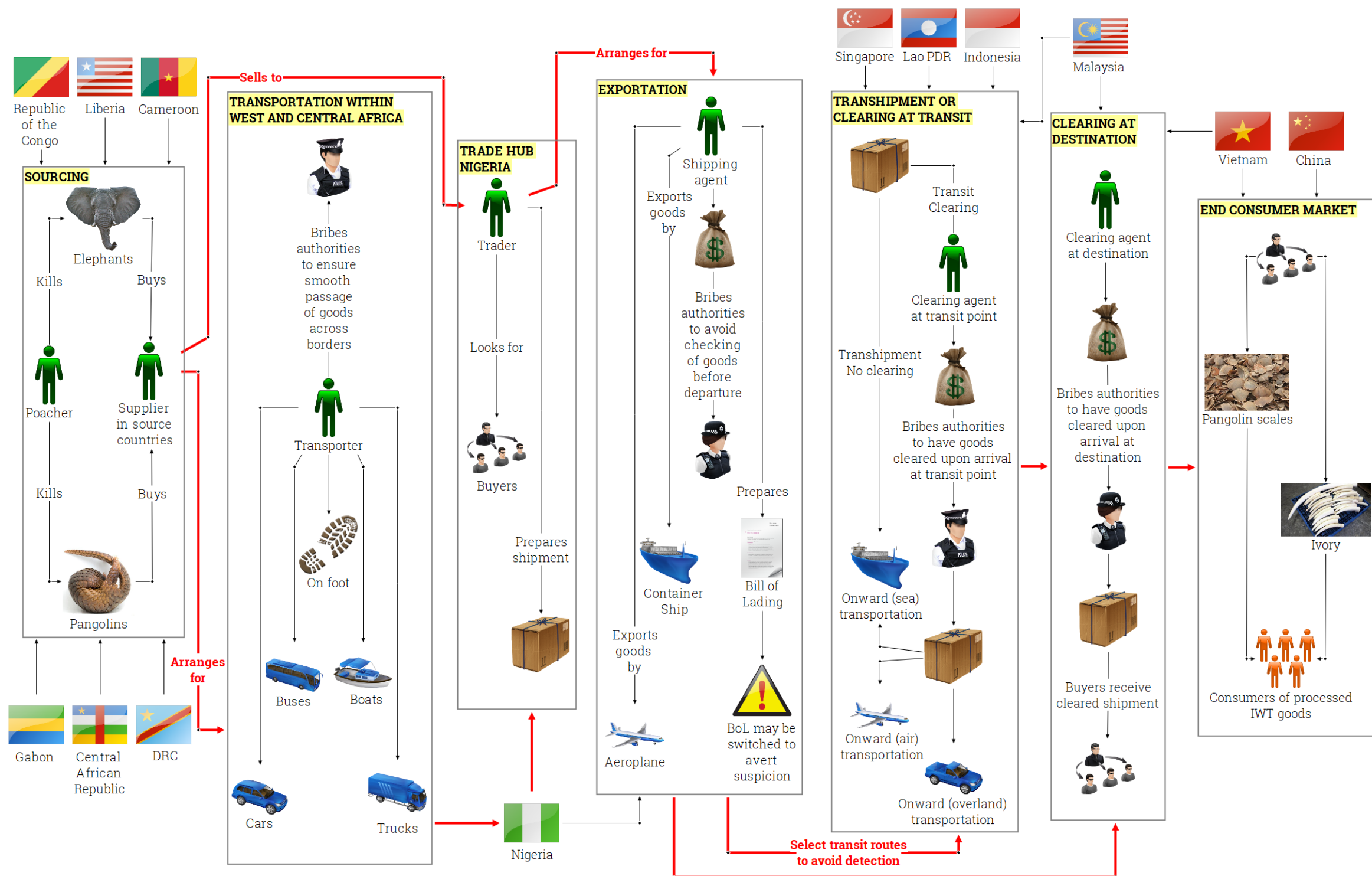
In terms of communication, Mr X prefers to contact his customers via secure messaging apps and accepts bank transfers for payment.

Air shipment

Mr Y specialises in clearing ivory and pangolin scales exported from Murtala Muhammed International Airport to Malaysia, Singapore, Thailand, Laos, Cambodia and Vietnam. He sends the illicit wildlife twice a week via air cargos transported by Emirates, Ethiopian or Turkish airlines. These shipments may need to transit through Dubai or Malaysia first.

According to Mr Y, customers are asked to pay the money when the goods are dropped at his warehouse; he purchases a variety of packing materials, including foam, aluminium, plastic, sacks and strong cartons. The illicit goods are then shipped in cargo declared as legal products such as auto parts.

Despite COVID-19 travel restrictions, Mr Y has been able to send his shipments to Asia throughout 2020. Significant bribes are paid to airport customs officials and airline staff to secure the shipments. In addition to clearing services, Mr Y can source ivory and pangolin scales from Cameroon on behalf of his customers.



The Africa to Asia trafficking network

EIA has identified several African and Asian nationals involved in trafficking wildlife, particularly ivory and pangolin scales, from West and Central Africa to Asia.

Primary source countries include Cameroon, Central Africa Republic, DR Congo, Republic of Congo, Gabon and Liberia. **Poachers** and **suppliers** are based in these countries to source ivory and pangolin scales before **transport agents** arrange for these products to be shipped to Nigeria.

Once in Nigeria, **traders** work closely with **shipping**

agents to clear shipments for export through major hubs, including Apapa seaport and Lagos airport.

Although traders have direct route options from Nigeria to seaports in Vietnam such as Hai Phong, Da Nang and Ho Chi Minh City, most syndicates choose to use transshipment and/or transit locations such as Malaysia and Singapore to 'break the route' and circumvent

Figure 4: The intricate and vast operations of organised crime networks involved in wildlife crime can only be effectively disrupted by intelligence-led multinational and cross-departmental enforcement collaboration targeting intermediary and higher levels of such networks, including corrupt state actors

detection. Repacking and bill switching may take place through **clearing agents during transit** before onward transportation to Vietnam and China via air, sea or land routes.

Upon arrival, **clearing agents at the destination** are responsible for clearing the illicit ivory and pangolin scale shipments before forwarding them to the

importers, who then sell the goods on to processors and/or end consumers.

Corrupt government officials at ports play a key role along the trafficking route. Traffickers pay bribes to ensure the smooth passage of goods across borders, to circumvent checking and to ensure the goods are cleared at export, transit or destination locations.

Role of corruption in Nigeria and nearby countries

Traffickers and shipping agents claim that customs officials at border control are often aware of the illegal wildlife goods being moved through their checkpoints.

Bribes are paid to officials to facilitate import of export of illegal wildlife products, which can range from Nigerian naira 50,000-100,000 (approximately \$131-262) per tonne of goods per port.

Nigeria is regarded as a ‘safe’ country for the trade and shipment of illegal goods by wildlife traffickers because bribes can easily be paid – and accepted – so they can avoid detection, seizure and arrest or even retrieve their goods on the rare occasion when they have been seized by the authorities. Up to 70 per cent of the fees charged by corrupt clearing agents are for bribes to government officials and private transport company staff involved in the container scanning process. Corrupt customs officials demand different levels of bribes to circumvent scanning depending on the goods involved.

Illegal traders in Nigeria will ordinarily have a close to a network of corrupt individuals, including staff of the shipping line, customs officials and the port security staff involved in scanning shipments. They work as a team and share the bribe paid by illegal wildlife traders and freight agents.

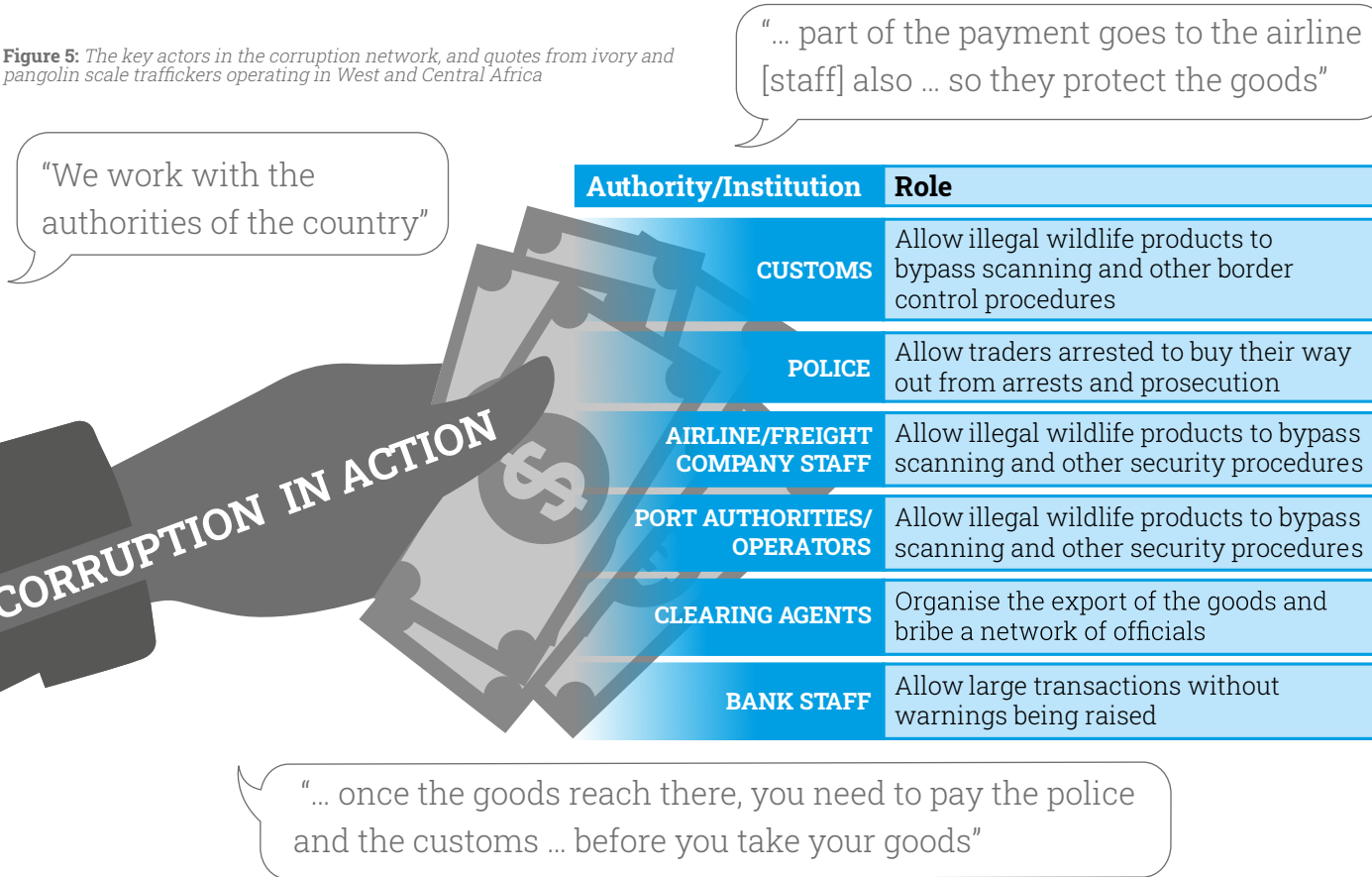
Similarly, in DR Congo traders send illegal wildlife products from the Port of Matadi with the help of bribed shipping company staff and high-ranking officials of the port authority and customs.

As demonstrated by the activities of Mr X and Mr Y (page 15), traffickers use multiple front companies to disguise their illegal business, using each company two to three times before switching to a new one.

Individual bank staff in Nigeria may also be involved in the illegal trade, helping traffickers to open bank accounts. Traffickers claim that as much as one billion Naira (approximately \$2.6 million) can be transferred through their accounts without the bank flagging any concerns.

Some shipping agents also claim they can manipulate shipping records by bribing customs contacts or other relevant staff to change the port of origin of a container on the paperwork to avoid customs detection by risk assessment.

Figure 5: The key actors in the corruption network, and quotes from ivory and pangolin scale traffickers operating in West and Central Africa



Impact of coronavirus pandemic on ivory and pangolin trafficking in West and Central Africa

With the onset of the COVID-19 pandemic, global lockdowns have disrupted and halted the international travel and trade routes on which wildlife trafficking networks previously relied to transport their illicit products across and within borders.

EIA engagements with wildlife traffickers throughout 2020 reveal how they have responded to the pandemic. As lockdown restrictions are lifted and international travel resumes, it will be crucial to monitor any increase in global wildlife trafficking .

The first case of COVID-19 in West and Central Africa was recorded in Nigeria in February 2020 and by late October 2020 a total of 313,933 cases had been recorded across the entirety of West and Central Africa.^{41,42} Since July 2020, some domestic and international travel restrictions in the region have been lifted, with international flights to and from Abuja and Lagos resuming in September 2020.

EIA data shows a significant drop in the seizures of ivory and pangolin scales this year compared with previous years, most likely due to global travel restrictions and the reduction in passenger flights. However, EIA investigations have also confirmed that ivory and pangolin scale trafficking is continuing despite the pandemic and while there has been a decrease in the number of seizures, this may be due to fewer enforcement staff available to conduct investigations and detect shipments at borders.

Investigations also reveal that traffickers across West and Central Africa have been unable to export illegal wildlife products due to lockdown restrictions. Despite this, sourcing routes for ivory and pangolin scales across West and Central Africa into Nigeria have continued to be used during the pandemic, albeit with some disruptions. EIA has established that these routes continue to be used to source large volumes of ivory and pangolin scales, most likely to stockpile the goods in anticipation of increased buyer-interest when the pandemic subsides.

While traffickers have inevitably found it more difficult to export goods from Africa to Asia via air, sea routes have remained active with containers of pangolin scales and ivory leaving Nigeria from Apapa Port and Port Harcourt to destinations in South-East Asia. It is also apparent that corruption continues to facilitate successful shipments and that traffickers make use of established contacts at borders who can be paid off to allow entry of persons or goods. It is believed that the number of containers leaving Nigeria has not reduced



Above: Illegal wildlife traders are exploiting the power of social media platforms and expanding their operations online to adapt to COVID-19 related travel restrictions

significantly during the pandemic because workers in the port rely heavily on bribes from traffickers to mitigate its economic impact. However, this became more challenging during the COVID-19 lockdown in Nigeria as the ability to clear containers is believed to be contingent on face-to-face liaison with senior officials or higher management who, because of the virus outbreak, have not been physically present at their workstations as frequently as before; this may have therefore slowed down some illegal wildlife transactions.

Lockdown in Nigeria and other countries has equally prevented Vietnamese and Chinese traders, the primary buyers of ivory and pangolin scales, from travelling into the country. Prior to lockdown, ivory and pangolin scale suppliers would rarely sell to buyers without face-to-face meetings, but EIA information has ascertained that traffickers have adapted their modus operandi by increasingly using online platforms to circumvent pandemic restrictions. demonstrating the flexibility and willingness of criminals to pursue profit in the face of increased risk. In light of this shift, it is possible that traffickers' online customer bases will have grown throughout 2020, increasing their potential sales and consequently maintaining pressure on globally threatened wildlife such as elephants and pangolins.



The Shuidong smugglers – owning the road

Findings from EIA's in-depth investigations into the activities of a syndicate of wildlife traffickers operating out of the town of Shuidong in southern China exemplify the drivers behind the shift from East Africa to West Africa as the main trafficking hub for ivory and pangolin.

EIA first encountered three members of the Shuidong group in the port of Pemba in northern Mozambique – Ou Haiqiang, Wang Kangwen and Xie Xingbang. Both Ou and Xie had been active in ivory trafficking in neighbouring Tanzania for more than a decade but improved enforcement leading to long jail sentences had prompted them to switch to Mozambique for sourcing. As Ou said: "In East Africa, only in Mozambique can these things still be moved out; it's not possible in any other place. West Africa is easy."

On that occasion, the gang shipped 2.3 tonnes of ivory tusks concealed in a container with plastic pellets and they departed with the shipping Bill of Lading in hand a couple of days before the tusks left Pemba.

The shipment took a circuitous route before finally arriving in Shuidong six months later. The key transit port was Busan, in South Korea, which did not make economic sense but was crucial from a smuggler's

perspective. In Busan, the group used a Chinese freight agent who specialised in moving consignments of illegal wildlife onwards to China, the final destination, switching the shipping documents to make it appear the shipment originated in South Korea and not Africa to confound risk-profiling systems used by customs. For this service, the agent charged the equivalent of \$45 per kilo for pangolin scales and \$145 a kilo for ivory.

The relationship with the freight agent was managed by Chinese national Wong Muk Nam, an investor in the ivory consignment and a confidante of Wang. Due to these connections, Wong was said to 'own the road' – in other words, he controlled the Busan trafficking route.

The use of plastic pellets to conceal the tusks was as carefully chosen as the route – Wong operated a plastics factory in Foshan, southern China, so an apparent shipment of pellets from Busan via Hong Kong to southern China would not raise any red flags with customs.

He had made at least five previous successful shipments of illegal wildlife along the route using the same modus operandi. Chinese court records show Wong, along with a third Chinese national named Tan, made three shipments of pangolin scales from



Lagos in Nigeria to Shuidong during 2015, weighing a total of almost four tonnes. All of the shipments were concealed with plastic pellets and routed via Busan.

By late 2016, the Shuidong syndicate's attention was increasingly shifting to Nigeria. Ou explained how the sales price in China for 'white' savannah elephant tusks was decreasing and cutting into profit margins, while the value of 'yellow' tusks from forest elephants found in Central and West Africa provided a greater return. Ou was also smuggling pangolin scales, attracted by lower sourcing costs and perceived as less risky than ivory. By early 2017, Ou, in partnership with Wang, was sourcing ivory tusks and pangolin scales from contacts in Lagos.

Acting on information from EIA, Chinese law enforcement agencies raided Shuidong. Wang was arrested and subsequently sentenced to 15 years in jail. Xie was tracked down to Tanzania and was jailed for six years upon his return to China. Ou and Tan were located in Nigeria and were extradited to China in early 2019 to face trial. Wong remains at large and is subject to an INTERPOL Red Notice.

Above: Undercover engagement by EIA investigators with members of the Shuidong syndicate lasting from April 2016 to April 2017 demonstrated how the economics of the ivory and pangolin trade, coupled with improved enforcement in parts of East Africa, led members of the group to switch operations westward



Conclusion and recommendations

A wealth of natural resources combined with pockets of violent conflict, high levels of poverty, corruption and weak rule of law make vast swathes of West and Central Africa an extremely challenging region in the fight against wildlife trafficking.

Given these challenges, there is no 'one size fits all' approach that can be applied across the board; however, there are certain actions that could and should be implemented to address the fundamental drivers of ivory and pangolin trafficking in the region.

With elephant and pangolin populations in severe decline in West and Central Africa, as demonstrated by local extinctions of certain elephant populations, there is no time to waste in securing implementation.



► Lack of political will

Wildlife trafficking should be a matter of national priority due to its role in irreversible biodiversity decline, the spread of zoonotic diseases such as COVID-19, the convergence with other serious crime types, harming economic development and the destabilisation of the rule of law.

Heads of states should prioritise the development and implementation of national strategies to tackle wildlife trafficking, backed up by adequate resources and a commitment to uphold the accountability of relevant government agencies

► Corruption

Urgent action is needed to stop corrupt State actors in key government agencies who facilitate and protect the operations of organised wildlife trafficking networks. Without tackling this corruption, it will be impossible to strengthen and implement the law enforcement and policy responses required to tackle organised wildlife crime.

Conduct financial investigations to prosecute and secure deterrent penalties which include the seizure of assets of corrupt State actors who use their positions to facilitate ivory and pangolin trafficking, particularly within customs, border police and other key government agencies

► Lack of law enforcement

A low level of capacity and under-resourced law enforcement agencies, along with a lack of co-operation between relevant national agencies, has hindered a successful criminal justice response to tackling wildlife crime to date.

Undertake intelligence-led investigations to target wildlife criminals operating at intermediary and higher levels, co-ordinated by a well-resourced multi-agency enforcement unit/taskforce

► Role of foreign nationals

Foreign criminals, from both neighbouring and other countries in the region, as well as Asian countries such as China, Malaysia and Vietnam, play a key role in sourcing, transporting, consolidating, trafficking and financing ivory and pangolin trafficking.

Utilise existing channels for mutual legal assistance as well as diplomatic and political bilateral dialogues to strengthen international law enforcement co-operation with relevant countries, prioritising syndicate intermediaries as well as leaders and financiers residing abroad

► Non-compliance within the transport sector

Countries such as Cameroon, DR Congo and Nigeria play a prominent role in the sourcing and transportation of ivory and pangolin scales destined for Asian markets. Specialised transporters exploit corruption at key entry/exit points and adopt fraudulent techniques to avoid detection such as using front companies and switching the bill of lading.

Incentivise shipping companies, clearing agents, freight forwarders and other private transport operators to enhance the security of the supply and transportation system and effectively co-operate with customs officials to detect, seize and investigate wildlife trafficking

► Weak governance

The majority of countries in West and Central African region have a track record of poor government transparency and accountability as well as the suppression of press and civil society freedoms, which have hindered efforts to counter organised crime and enabled a culture of corruption and non-compliance.

Empower civil society and local community groups, particularly in areas close to wildlife habitats and hotspots for wildlife trafficking, as well as media, to report wildlife trafficking and challenge government failures



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30. Seizure data up till 24 Nov 2020, countries are linked to seizures through seizure location, DNA analysis of ivory, shipping route, and suspect nationality. One seizure may be linked to multiple countries.

31. Seizure reports that only mention “Congo” and the exact country cannot be identified have been excluded from the calculation.

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