



**Wildlife Justice**  
Commission

# Convergence of wildlife crime with other forms of organised crime

May 2021



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# Acronyms

|                      |   |
|----------------------|---|
| <b>BMF</b>           | Bruno Manser Fund   |
| <b>CITES</b>         | Convention on the International Trade in Endangered Species of Wild Fauna and Flora |
| <b>CoP</b>           | Conference of the Parties   |
| <b>DEA</b>           | United States Drug Enforcement Agency   |
| <b>DSI</b>           | Department of Special Investigation (Thailand)                                      |
| <b>Hong Kong SAR</b> | Hong Kong Special Administrative Region of the People's Republic of China           |
| <b>IUU fishing</b>   | Illegal, Unreported and Unregulated fishing   |
| <b>MACC</b>          | Malaysia Anti-Corruption Commission   |
| <b>NGO</b>           | Non-governmental organisation   |

|                   |   |
|-------------------|---|
| <b>NRCN</b>       | Natural Resources Conservation Network                          |
| <b>PERHILITAN</b> | Department of Wildlife and National Parks Peninsular Malaysia   |
| <b>RFD</b>        | Royal Forest Department (Thailand)                              |
| <b>UNEP</b>       | United Nations Environment Programme                            |
| <b>UNODC</b>      | United Nations Office on Drugs and Crime                        |
| <b>UNTOC</b>      | United Nations Convention against Transnational Organised Crime |
| <b>USFWS</b>      | United States Fish and Wildlife Service                         |
| <b>UWA</b>        | Uganda Wildlife Authority                                       |

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# Executive Summary

**Over the past two decades**, wildlife crime has become a form of transnational organised crime, generating billions of dollars annually and affecting almost every country. As wildlife crime has increased in seriousness and profitability as a crime type, so too have reports of its convergence with other forms of organised crime. However, these reports have been mostly anecdotal, and the nature of this relationship is still largely undocumented.

**Through its own investigations** and intelligence analysis, the Wildlife Justice Commission has also collected evidence of criminal networks that are dealing in wildlife alongside other illicit commodities. This report aims to present some of these examples, along with information collected from open sources, to contribute to the knowledge base on this issue. It sets out 12 case studies that illustrate a range of converging crime types and typologies that have transpired in different regions of the world to increase the understanding of how these intersections can occur on the ground. The case studies include six cases involving the trafficking of terrestrial wild animals, three cases involving fisheries crimes, and three cases involving timber crimes (*although they are collectively referred to as wildlife crime throughout the report*).

**The cases demonstrate** that criminal groups may have a range of motivations to diversify their activities and engage in wildlife or other types of crime.

Convergence can occur opportunistically on an ad-hoc basis, as a complete “career shift” in response to changing conditions, or as part of a diversification strategy to increase profits across a range of illicit commodities. It can also occur transactionally when criminal groups in different markets exchange goods or services with each other or could be embedded to such an extent that the crimes are inextricably linked.

**Intelligence analysis** is an essential tool to identify cases where convergence exists and to manage the highest threat from organised crime. Yet there is a lack of focus on the collection and analysis of wildlife crime data and information. Few governments hold their own comprehensive datasets, and unlike other illicit commodities, there is no standardised data collection for wildlife. Furthermore, there is inadequate sharing of the information that does exist, meaning that opportunities to fully understand the threat posed by convergence are being missed and resources are not being allocated appropriately in response to the problem.

**Several commonalities** can be observed in the case studies, particularly elements of bribery and corruption that are an underlying factor present in almost every case, and money laundering as a converging crime linked to the proceeds generated from wildlife crime. The clear and frequent intersection of these crimes highlights the need for financial and

corruption investigations that run in parallel or in response to wildlife crime cases; however, few countries are currently undertaking these types of investigations. Financial investigations in particular are an important but under-utilised technique to identify and trace the proceeds of crime, with the aim of ultimately seizing or confiscating funds or property derived from crime and removing the financial incentive and expected reward for criminals.

**The cases also demonstrate** that wildlife crime is a cross-cutting criminal activity which cannot be tackled in isolation from other crimes. Multi-agency investigations and task forces can be an effective strategy to address convergence, offering alternative legislation, powers, and expertise of other law enforcement agencies to enable the application of the full force of the law to the crime. The Wildlife Justice Commission's investigations have frequently shown that high-level wildlife criminals can also be less operationally savvy compared to top-level criminals in other crime types, which can sometimes present an easier entry point for the investigation of organised crime. These are opportunities that could be better leveraged by law enforcement agencies to target and remove the common nodes between networks, have a greater impact on disrupting transnational organised crime groups, and prevent networks from reforming.

*Wildlife crime is a cross-cutting criminal activity which cannot be tackled in isolation from other crimes.*

**Crime convergence** should be further studied and integrated as part of the approach to tackle wildlife crime and organised crime more broadly, as improved understanding of this intersection can help to identify more strategic policy and law enforcement responses to address it.

**This report offers** a set of recommendations for law enforcement authorities and policy makers that could assist in this regard:

**i** **More consideration** should be given to intelligence collection and sharing in a timely and secure manner, and for governments to develop their own comprehensive wildlife crime information systems.

**ii** **Organised crime** group mapping should be an essential tool to identify how and where convergence may be occurring, and to tackle wildlife crime as an organised crime threat.

**iii** **Multi-agency cooperation,** joint investigations and task forces should be utilised where appropriate to bring the necessary law enforcement expertise to target convergence and explore all angles of the criminal scenario.

**iv** **Consideration should be** given to using alternative legislation relating to the convergent or ancillary offences where relevant and appropriate.

**v** **Financial and corruption** investigations should be conducted in parallel or in response to wildlife crime cases to identify any associated money laundering or corruption offences, payment methods, and to identify the proceeds of crime to facilitate asset recovery.

**vi** **Greater utilisation of** specialised investigative techniques such as communications interception, undercover operations, the use of listening and tracking devices, and controlled deliveries to gain a better understanding of where crime convergence may exist.

# Introduction

**In October 2020**, the Wildlife Justice Commission co-hosted a side event alongside the United Nations Office on Drugs and Crime (UNODC) at the 10th Conference of the Parties (CoP) to the United Nations Convention against Transnational Organised Crime (UNTOC), which focused on the cross-cutting nature of wildlife crime and the potential opportunities this can present for law enforcement to infiltrate criminal networks that may be engaging in multiple forms of organised crime. Coinciding with this side event, the Wildlife Justice Commission also published a briefing paper to highlight how intelligence analysis can lead to a greater understanding of such crime convergence.<sup>1</sup>

**Through its investigations** and intelligence work, the Wildlife Justice Commission has uncovered evidence of criminal networks that are dealing in wildlife alongside other commodities such as illicit drugs, human trafficking networks that are opportunistically engaging in wildlife crime, and links between wildlife crime and fraud, corruption, and money laundering. A growing number of media articles indicating similar types of convergence have also been published in recent years. However, there remains little quantitative data or analysis of this convergence, and much of what is understood is based on anecdotal evidence.

**This report seeks** to build on the Wildlife Justice Commission's previous briefing paper and the discussion at the UNTOC CoP side event by providing some concrete examples of cases where convergence is known to have occurred with wildlife, timber, and fisheries crimes, collected from both open sources and the Wildlife Justice Commission's operational work. It is by no means a comprehensive collection of case studies, but instead aims to contribute to the knowledge base on this issue by illustrating several different convergence typologies, determining some of the common elements between them, and identifying strategies these cases can offer to law enforcement and policy makers to better address transnational organised crime in the future. Based on learnings from these past cases, this report aims to strengthen policy and enforcement efforts moving forward.

**As the case studies** in this report demonstrate, indications of convergence may be present in many cases, but intelligence analysis and organised crime group mapping<sup>2</sup> are essential tools to build a deeper understanding of how and where convergence is occurring. Further developing this understanding is critical to enable authorities to more effectively tackle wildlife crime from the point of view of organised crime.

<sup>1</sup> <https://wildlifejustice.org/wildlife-crime-the-soft-underbelly-of-organised-crime/>

<sup>2</sup> Organised crime group mapping is a technique to identify, evaluate and prioritise the management of the threat that a criminal group poses. It is based on the gathering and assessment of current intelligence to define and score the threat posed, based on a series of indicators. This technique lends itself well to identifying when criminal groups are involved in a variety of different crimes.

A close-up photograph of a large pile of shark fins and gill rakers, likely from a shark finning operation. The fins are light-colored, ranging from off-white to light brown, and are piled together on a blue, textured surface. The background is blurred, showing a concrete floor and a person's leg in the distance.

*Intelligence analysis and organised crime group mapping are essential tools to build a deeper understanding of how and where convergence is occurring.*

# Brief review of wildlife crime convergence

**To date** there is still limited documentation and empirical evidence of the intersection of wildlife crime and other crime types.

**One of the earliest reports** noting this convergence was published by INTERPOL in 2015, observing that a growing number of its members were reporting environmental crimes as increasingly associated with other crime types. The report stated that this convergence was becoming more complex and was one of the greatest challenges facing law enforcement officers when dealing with organised crime syndicates.<sup>3</sup>

**An attempt to quantify** it followed in 2016, with a joint study by INTERPOL and the United Nations Environment Programme (UNEP) based on questionnaire responses from 69 member countries, which found that 84% of respondents had observed a convergence between environmental crime and other types of serious crime. The reported convergences included corruption (42%), counterfeiting (39%), drug trafficking (36%), cybercrime (23%) and financial crime (17%), but there was limited information or specific examples of how this convergence was presenting on the ground.<sup>4</sup>

**In a similar vein**, a report published by TRAFFIC analysed 1,321 incidents of illegal wildlife trade

from 2004 to 2019 recorded in its Wildlife Trade Information System, which documented links with other forms of crime and/or the seizure of other commodities. It reported the most common convergences as corruption (53%), illicit drugs (14%), fraud (13%), firearms (9%), money laundering (6%), and other (5%).<sup>5</sup>

**Despite these indications** of convergence, Eurojust's analysis of environmental crime cases in Europe suggests that if other crimes are detected alongside an environmental crime, they will often become the primary focus of investigations and criminal proceedings, while the environmental crime is treated as an ancillary offence, or in some cases may not be fully investigated or prosecuted.<sup>6</sup> The tendency to prioritise enforcement efforts on other crimes and overlook environmental crimes is likely to be a contributing factor behind the limited empirical evidence of convergence in this field.

**An unpublished**, classified study of data from the United States intelligence community and other U.S. government data was reported to have found that convergence of wildlife crime in East Africa was systemic. Analysis of the combined data purportedly revealed that two-thirds of the actors and networks associated with wildlife trafficking in that region overlapped with narcotics networks, along

<sup>3</sup> INTERPOL (2015), *Environmental Crime and its Convergence with other Serious Crimes*, [accessed at this link](#).

<sup>4</sup> INTERPOL and UN Environment (2016), *Strategic Report: Environment, Peace and Security - A convergence of threats*, <https://wedocs.unep.org/handle/20.500.11822/17008>

<sup>5</sup> TRAFFIC (2020), *Initial analysis of the financial flows and payment mechanisms behind wildlife and forest crime*, p.21, accessed at: <https://www.traffic.org/publications/reports/case-digest-an-initial-analysis-of-the-financial-flows-and-payment-mechanisms-behind-wildlife-and-forest-crime/>

<sup>6</sup> Eurojust (2021), *Report on Eurojust's Casework on Environmental Crime*, p.9, accessed at: [https://www.eurojust.europa.eu/sites/default/files/2021-01/report\\_environmental\\_crime.pdf](https://www.eurojust.europa.eu/sites/default/files/2021-01/report_environmental_crime.pdf)

with other priority threats. The study promoted the utility of merging data across multiple sectors and commodities to identify interconnections that may otherwise be missed and taking a “commodity-agnostic” approach to tackling criminal networks.<sup>7</sup>

**Using a different approach**, an analysis of data from judicial case files in 118 countries since 2000 has found that on average between 80-90% of sampled case files show transnational criminal networks engaged in seven or more types of organised crime, including wildlife trafficking. This provides an indication of the frequency with which convergence occurs in the field of organised crime.<sup>8</sup>



**A recent study** published in 2020 analysed 106 transnational environmental crime cases (including wildlife, timber, and natural minerals smuggling) with links to other serious crimes to identify some of the main ways that convergence is occurring.<sup>9</sup> It found the most common trend was criminal groups diversifying into environmental crime in response to changing conditions, and that some groups had transformed with complete “career shifts”, while others chose to dominate a specific product line or market. The second most common form was criminal groups that maintained flexible operations across multiple illicit commodities and used their expert knowledge to opportunistically get involved

*The tendency to prioritise enforcement efforts on other crimes and overlook environmental crimes is likely to be a contributing factor behind the limited empirical evidence of convergence in this field.*

<sup>7</sup> Gloria Freund, former Combating Wildlife Trafficking Lead at the U.S. Office of the Director of National Intelligence, spoke unofficially on the study findings at the Wildlife Justice Commission’s UNTOC CoP side event in October 2020. The full event recording can be accessed here: <https://vimeo.com/470939942>

A broad summary of the study findings is also published here: <https://www.worldwildlife.org/pages/tnrc-blog-understanding-crime-convergence-to-better-target-natural-resource-corruption>

<sup>8</sup> Edgardo Buscaglia is a senior scholar at Columbia University, and these findings from his work on anti-organised crime effectiveness were also mentioned at the Wildlife Justice Commission’s UNTOC CoP side event in October 2020. The full event recording can be accessed here: <https://vimeo.com/470939942>

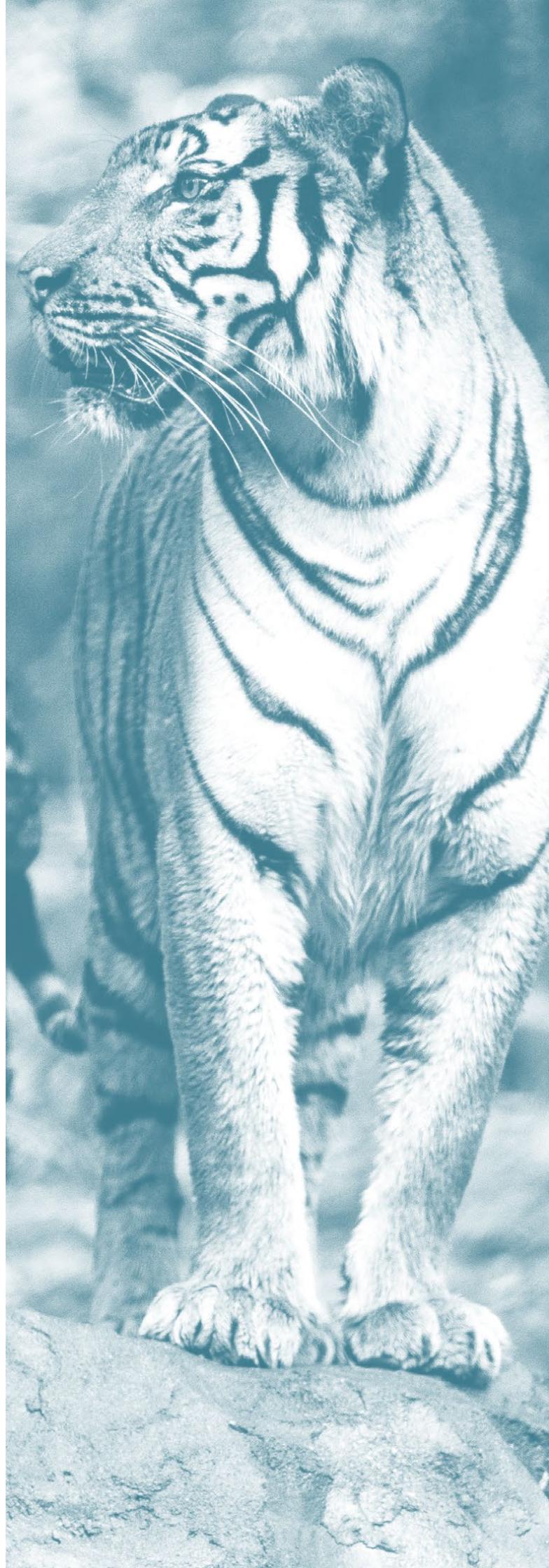
<sup>9</sup> Van Uhm D.P & Nijman RCC (2020), The Convergence of Environmental Crime with other serious crimes: Sub-types within the environmental crime continuum, accessed at: <https://journals.sagepub.com/doi/full/10.1177/1477370820904585>

in environmental crimes, such as their established access to strategic smuggling routes. To a lesser extent it also identified convergence occurring between licit and illicit markets, with the use of legitimate companies to camouflage criminal activities.

**More broadly**, increased globalisation and international trade have enabled criminal organisations to take a global outlook in pursuing new illicit markets, with criminals often benefiting from the same technology, transportation, and infrastructure developments that enable legitimate industries to conduct business across borders.<sup>10</sup> In the field of wildlife crime, criminal groups may also be motivated to diversify their activities by the potential for high profits combined with relatively weaker legislation and lower criminal penalties for these activities in many countries compared to other more traditional crimes, such as drug trafficking.

*Increased globalisation and international trade have enabled criminal organisations to take a global outlook in pursuing new illicit markets.*

<sup>10</sup> Radisch, J. (2016), *Illicit Trade: Convergence of criminal networks*, accessed at: [https://www.oecd-ilibrary.org/governance/illicit-trade/illicit-trade\\_9789264251847-4-en](https://www.oecd-ilibrary.org/governance/illicit-trade/illicit-trade_9789264251847-4-en)



## Illustrative case studies of convergence

**This section** presents a set of 12 case studies where convergence is known to have occurred with crimes involving terrestrial wild animals, fisheries, and timber. The case studies have been collected from both open sources and the Wildlife Justice Commission's opera-

tional work, with the aim of reflecting a variety of converging crime types and convergence typologies that have transpired in different regions of the world. Table 1 below provides a summary of the 12 case studies and the diversity of convergences they represent.

| Case study | Commodities involved                              | Convergence typology   | Geographic region/s             |
|------------|---|--|---------------------------------|
| 1          | Elephant ivory, rhino horns<br>Illicit drugs      | Opportunistic convergence and diversification of illicit commodities | East Africa                     |
| 2          | Tiger parts<br>Human trafficking                  | Opportunistic convergence  | Southeast Asia                  |
| 3          | Live reptiles<br>Migrant smuggling                | Unconfirmed – possibly complete “career shift”                       | South Asia                      |
| 4          | Live reptiles<br>Fraud                            | Unconfirmed – possibly complete “career shift”                       | South Asia                      |
| 5          | Wildlife (various)<br>Gold/precious stones        | Diversification of commodities                                       | Various                         |
| 6          | Rhino horns<br>Various fraud and smuggling crimes | Opportunistic convergence  | Europe                          |
| 7          | Shark fins<br>Illicit drugs                       | Diversification of commodities                                       | North America<br>East Asia      |
| 8          | Abalone<br>Illicit drugs                          | Transactional convergence  | Southern Africa                 |
| 9          | Fish<br>Human trafficking/modern slavery          | Transactional convergence  | Southeast Asia                  |
| 10         | Timber<br>Illicit drugs                           | Diversification of commodities                                       | Southeast Asia<br>South America |
| 11         | Timber<br>Corruption and fraud                    | Embedded convergence   | South America                   |
| 12         | Timber<br>Corruption and money laundering         | Embedded convergence   | Southeast Asia                  |

Table 1: Summary of 12 convergence case studies.

## Wildlife crime

### CASE STUDY

1

#### COMMODITIES INVOLVED

Elephant ivory, rhino horns, illicit drugs

#### CONVERGENCE TYPOLOGIES

Opportunistic convergence and diversification of illicit commodities

#### GEOGRAPHIC REGION

East Africa



In June 2019, the United States Department of Justice issued an indictment charging four men for conspiracy to smuggle rhino horn and elephant ivory valued at more than USD 7 million – Moazu Kromah (Liberian national residing in Uganda), Amara Cherif (Guinean national), Mansur Mohamed Surur (Kenyan national), and Abdi Hussein Ahmed (Kenyan national). In addition, Kromah, Cherif and Surur were charged with conspiracy to commit money laundering, and Surur and Ahmed were charged with conspiracy to possess and distribute more than 10 kg of heroin.<sup>11</sup> The case appears to present the Kromah network as a wildlife trafficking network first and foremost, which engaged in heroin trafficking opportunistically rather than as part of its usual business activities.

The four suspects are alleged members of a transnational criminal group based in East Africa engaged in the large-scale trafficking of at least 190 kg of rhino horn and 10 tonnes of ivory between 2012-2019 from Uganda, Democratic Republic of Congo, Guinea, Kenya, Mozambique, Senegal, and Tanzania to buyers in Southeast Asia and the United States. Payments from foreign buyers were often sent in the form of international wire transfers, some through U.S. financial institutions, and paid in cash. Separately, from 2018-2019, Surur and Ahmed are also alleged to have conspired to possess and distribute 10 kg of heroin to a buyer represented to be located in New York.

Kromah was initially arrested in February 2017 by the Uganda Wildlife Authority (UWA) in cooperation with the Natural Resources Conservation Network (NRCN, a Ugandan NGO) in possession of 1.3 tonnes of ivory. Although Kromah is described as being at the centre of vast ring of organised criminals, connected to at least four major criminal syndicates, the case did not progress through Ugandan courts due to suspected corrupt elements in the criminal justice system.<sup>12</sup>

However, the size and importance of the case caught the attention of the U.S. Fish and Wildlife Service (USFWS), which opened a joint investigation with the U.S. Drug Enforcement Agency (DEA) and assistance from UWA and NRCN, to dig deeper into Kromah and his network's criminal activities.

<sup>11</sup> <https://www.justice.gov/usao-sdny/pr/members-african-criminal-enterprise-charged-large-scale-trafficking-rhinoceros-horns>

<sup>12</sup> <https://globalinitiative.net/wp-content/uploads/2020/01/RB3.dec19Jan20.pdf>



*Image 1: Kromah at an airport in Entebbe, Uganda, before being extradited to the United States.  
Credit: Natural Resources Conservation Network.*

**The joint investigation** uncovered both the African and Asian ends of the network and its criminal dealings over a seven-year period. A key shipment that Kromah's network is believed to have been responsible for was six tonnes of ivory that was seized in Malaysia in December 2012, comprising four tonnes of ivory from savannah elephants in East Africa and

two tonnes of ivory from forest elephants in West Africa. A subsequent DNA analysis of the seized ivory indicated that it had originated from at least nine different African countries.<sup>13</sup> This shipment demonstrates the significant reach and criminal access of the network behind it in sourcing and consolidating ivory from such a large geographic area. These factors also undoubtedly facilitate their ability to obtain other illicit commodities.

**Kromah was arrested** for the second time in Uganda in June 2019 and promptly extradited to the United States. Cherif was also arrested in June 2019 in Senegal and later extradited to the United States in April 2020. Surur was eventually arrested in Kenya in July 2020 and extradited to the United States in January 2021. Ahmed remains a fugitive. The case is now awaiting prosecution in the United States.<sup>14</sup>

**Another significant case** demonstrating the convergence of these crime types is the arrest of the Akasha brothers, Baktash and Ibrahim, in Kenya in November 2014. The brothers were the subjects of a joint investigation between DEA and Kenya's Anti-Narcotics Unit and were charged with conspiracy to import and distribute 99 kg of heroin and 2 kg of methamphetamine into the United States and obstruction of justice, among other charges. The Akasha brothers were allegedly responsible for the manufacture, shipment, and distribution of tonnes of narcotics throughout the world for over two decades.<sup>15</sup> Conversely with

<sup>13</sup> <https://intpolicydigest.org/moazu-kromah-and-the-case-of-the-west-african-ivory-cartel/>

<sup>14</sup> <https://www.justice.gov/usao-sdny/pr/us-attorney-announces-extradition-kenyan-national-large-scale-trafficking-rhinoceros>

<sup>15</sup> <https://www.justice.gov/usao-sdny/pr/former-leader-kenyan-organized-crime-family-and-his-brother-plead-guilty-narcotics>



*Image 2: (L-R) Baktash Akasha, Gulam Hussein, Ibrahim Akasha and Vijaygiri Goswami with their lawyer during a hearing at Mombasa Law Courts in February 2015. Credit: Reuters/Joseph Okanga.*

the Kromah network, the Akasha network was an established drug trafficking network which appears to have increasingly diversified into ivory trafficking in response to demand and opportunity.

**In January 2017**, an out-of-court arrangement was agreed between the United States and Kenyan authorities, and the brothers and two other defendants were extradited to the United States. It was later revealed that the brothers had conspired to pay “hundreds of thousands of dollars in bribes to judges, pros-

ecutors and law enforcement officials” in Kenya to attempt to control the extradition hearings. To date, none of the corrupt individuals within the Kenyan criminal justice system have been publicly identified. In the Manhattan federal court in New York in August 2019, Baktash was sentenced to 25 years in prison<sup>16</sup> and in January 2020 Ibrahim was sentenced to 23 years in prison, to be served in the United States.<sup>17</sup>

**Although the indictment** and conviction of the Akasha brothers only related to drug trafficking

<sup>16</sup> <https://www.justice.gov/usao-sdny/pr/former-leader-violent-kenyan-organized-crime-family-sentenced-25-years-prison-narcotics>

<sup>17</sup> <https://www.reuters.com/article/us-kenya-drugtrafficking-usa-idUSKBN1Z92G2>

offences, analysis conducted by the Satao Project, a strategic intelligence organisation, found significant overlaps with ivory. Their analysis of phone logs, shipping documents and company records has allegedly linked the Akasha brothers to 13 large ivory shipments since 2013 with a combined weight of 30 tonnes.<sup>18</sup> Using completely different methodology, DNA analysis of large ivory seizures made between 2006 and 2015 also connected at least seven seizures to a Mombasa-based network, which is believed to denote the Akasha network. The DNA analysis was based on a “sample matching” technique, identifying pairs of ivory tusks that become separated during the trafficking process and split between different shipments. The study identified a large number of cases where pairs of tusks turned up in successive seizures that were shipped close in time through a common port, implying that the shipments were likely packed by the same trafficker.<sup>19</sup>

**Furthermore**, the DEA agent leading the investigation stated that evidence of the network’s involvement in wildlife crime was found throughout recordings made by DEA sources, and as a multi-faceted criminal organisation, ivory was just one of their money-making products. Although the DEA chose to pursue the indictment of the Akasha brothers solely on drug trafficking, it was reported that the link to wildlife crime played an important role in eventually securing their extradition to the United States.<sup>20</sup>

## GOOD PRACTICE

- **Multi-agency investigation** enabled collaboration between specialised law enforcement agencies and brought together the expertise and resources needed to tackle crime convergence in this case.
- **Specialised investigation** techniques such as undercover operations are important to gather evidence of the full criminal scenario and build a strong case for prosecution. In the Akasha case, evidence collected during undercover operations also supported the extradition request.

## INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Organised crime group mapping** is a technique to assess the level of criminality of a group and prioritise investigation efforts on those groups that pose the greatest threat. As this technique is focused on networks, it lends itself well to identifying convergence and groups that are involved in a variety of different crimes.

<sup>18</sup> <https://www.theguardian.com/environment/2017/aug/19/super-gangs-africa-poaching-crisis>

<sup>19</sup> Wasser, S.K. et al (2018), *Combating transnational organised crime by linking multiple large ivory seizures to the same dealer*, Science Advances Vol. 4, no. 9, accessed at: <https://advances.sciencemag.org/content/4/9/eaat0625>

<sup>20</sup> <https://www.theguardian.com/environment/2017/aug/19/super-gangs-africa-poaching-crisis>

## CASE STUDY

2

### COMMODITIES INVOLVED

Tiger parts and human trafficking

### CONVERGENCE TYPOLOGY

Opportunistic convergence

### GEOGRAPHIC REGION

Southeast Asia



**During an investigation** into the illegal trade in tiger parts within Southeast Asia, in August 2016 Wildlife Justice Commission operatives received intelligence of a Vietnamese national named Son who was residing in Kuala Lumpur and had access to tiger products in Malaysia. The operatives obtained multiple images of Vietnamese men in a jungle setting with a dead tiger, as well as tiger canines, claws, and tiger bone paste (images 3-6).

**This led the Wildlife Justice Commission** to launch a joint operation with the Department of Wildlife and National Parks Peninsular Malaysia (PERHILITAN) to investigate Son's network. An undercover operative met with two network members and was taken to an apartment complex in an outer suburb of Kuala Lumpur. In an apartment that was occupied by eight Vietnamese men, two tiger skins were shown to the operative.



*Images 3-6 (clockwise from top left): Photo of dead tiger in jungle setting that triggered the investigation; big cat skull; tiger bone paste that the group was selling; two tiger skins shown to Wildlife Justice Commission operatives.*

**Acting on information received** from the Wildlife Justice Commission, PERHILITAN officers raided the premises and arrested the eight men, seizing two tiger skins, one tiger canine, 20 bear claws and two

pieces of ivory jewellery. Son was not present at the apartment at this time, although PERHILITAN officers located and arrested him later that same day in possession of one tiger canine, one piece of ivory jewellery and one bear claw. Expert investigators established that the skins had come from wild Malaysian tigers, which increased the impact of the offences given that fewer than 200 tigers are estimated to remain in the wild in Malaysia.

**Following the arrests** of the nine men, only Son was found to be legally living in Malaysia – the other eight men had expired visas and their passports had been taken from them. PERHILITAN's interviews with these men indicated that they were working for a syndicate run by a Cambodian boss, illegally collecting agarwood in the Malaysian forests.<sup>21</sup> The men were allegedly brought from Vietnam to Malaysia and their passports withheld until they had collected enough agarwood to cover their expenses. While in the forests, the group was opportunistically poaching tigers and collecting other wildlife products to sell on the side to earn money.

**Information later obtained** by the PERHILITAN officers indicated that this same syndicate was also facilitating the recruitment of Vietnamese women to travel to Malaysia to work in the sex industry. The arrangement was similar to the men working in the forest, in that the women were held in Kuala Lumpur and dispossessed of their passports until it

was determined they had covered the costs of their transportation and housing. Information relating to this Cambodian/Vietnamese human trafficking network was shared with other relevant law enforcement agencies in Malaysia.

**Son and one other Vietnamese man** pled guilty to offences relating to the illegal possession of wildlife products. Son received a fine of MYR 15,000 (equivalent to approximately USD 3,700) and the other man received 36 months imprisonment. The remaining seven men were deported back to Vietnam.

#### GOOD PRACTICE

- **Collaboration between law enforcement authorities and NGOs** in sharing intelligence and conducting joint investigations can be effective to identify and target criminal patterns of behaviour.

#### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Wildlife crime can be an easier entry point to investigate other associated crimes**, and the use of wildlife legislation in some countries can provide law enforcement opportunities such as the ability to act even without a warrant and to inspect premises at any time.

<sup>21</sup> Agarwood is formed in the heartwood of certain tree species (particularly species of the *Aquilaria*, *Gonystylus*, and *Gyrinops* genus) when they become infected with a type of fungus. In response to the attack the tree produces a dark, aromatic resin, which is highly sought after for making perfumes, fragrances, and incense. All species of the *Aquilaria*, *Gonystylus*, and *Gyrinops* genus are listed as CITES Appendix II species.

## CASE STUDY

# 3

### COMMODITIES INVOLVED

Live reptiles and migrant smuggling

### CONVERGENCE TYPOLOGY

Unconfirmed – possibly complete “career shift”

### GEOGRAPHIC REGION

South Asia



**From 2016 to 2018**, the Wildlife Justice Commission investigated the illegal trade in live turtles and tortoises within Asia, focusing on criminal networks operating across India, Pakistan, Bangladesh, Sri Lanka, Malaysia, and Thailand. Several networks operating in India became key targets of the investigation and were involved in the supply of thousands of internationally protected turtles and tortoises (CITES Appendix I and II species) for the illegal live pet trade, including Indian star tortoises, black pond turtles, three-striped roofed turtles, red-crowned roofed turtles and tricarinate hill turtles. The investigation utilised covert investigation techniques and intelligence analysis in cooperation with law enforcement agencies in four

countries to gather evidence, effect arrests and seizures, and disrupt regional level criminality.

**In June 2017**, the Wildlife Justice Commission received intelligence relating to an Indian national in Chennai, India, who was actively involved in the supply of a range of wildlife products. Ongoing intelligence and covert investigations confirmed this suspect was illegally trading in Indian star tortoises, red sandalwood,<sup>22</sup> and live tiger cubs.

**Not only was there evidence** of a convergence of wildlife and timber trafficking in this case, but two years later in March 2019, the Wildlife Justice Commission received further intelligence and was able to obtain evidence of this same suspect’s involvement in the smuggling of migrants from Sri Lanka, India, and Bangladesh to several European countries. It was not confirmed whether this suspect had made a full transition to migrant smuggling as his primary criminal business, or whether he continued to engage in wildlife trafficking as well.

**The migrant smuggling methodology** involved obtaining fraudulent documentation to clear airline and immigration checks at departure ports in South Asia so that passengers could arrive at targeted destination countries in Europe and claim asylum. Further investigation by the Wildlife Justice Commis-

<sup>22</sup> Red sandalwood (*Pterocarpus santalinus*) is a tree species endemic to the southern parts of the Eastern Ghats mountain range in India. Its timber is highly valued for its deep red colour, particularly in China for use in carvings and furniture, and it also has several applications in traditional medicine. Exporting red sandalwood is prohibited in India except under some special circumstances and it is listed as a CITES Appendix II species. However, the illegal trade in red sandalwood is lucrative and shipments are regularly seized from smuggling attempts.

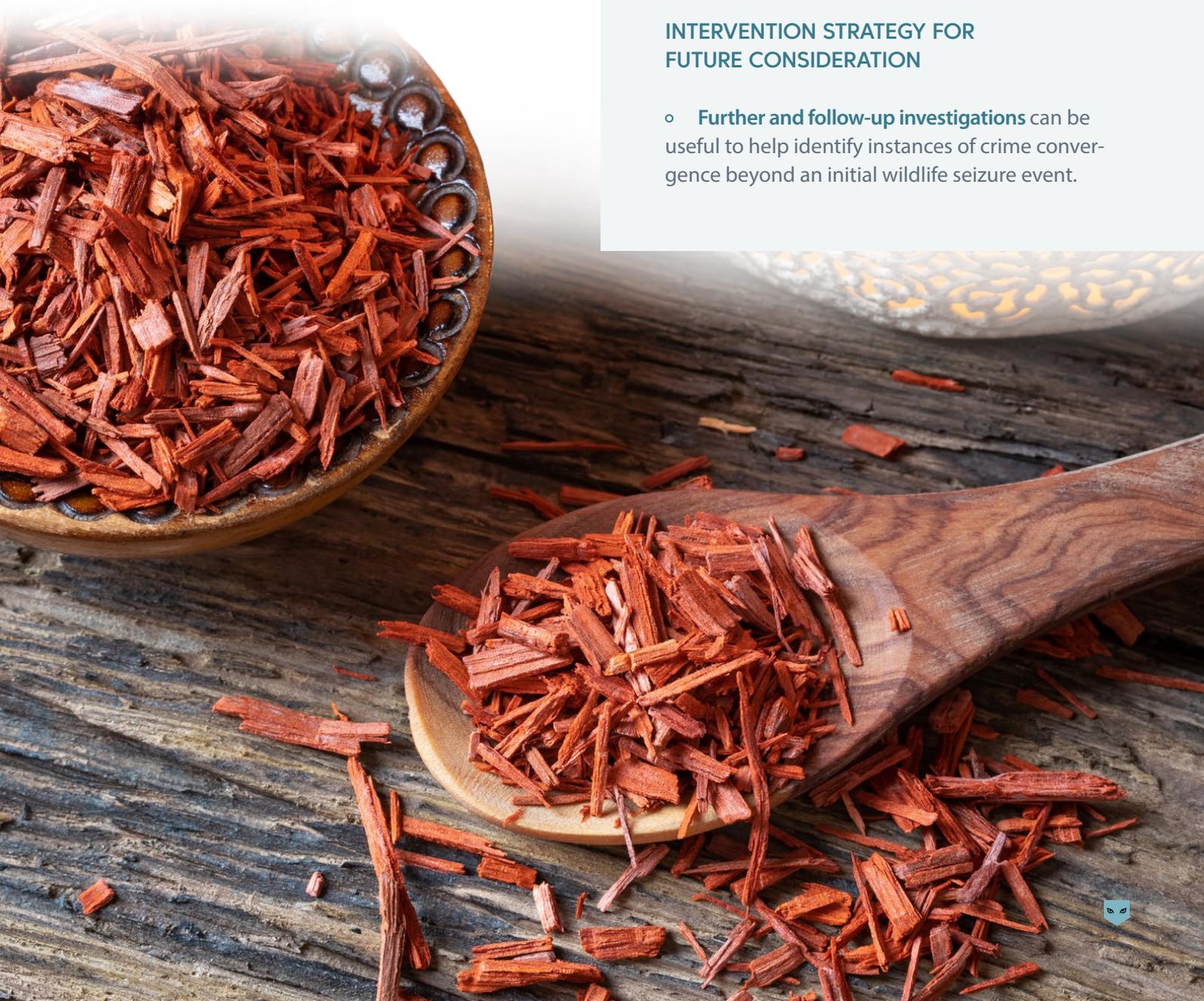
sion indicated that this network extended to several other countries outside of India. Information relating to the identity of the network and evidence of the use of fraudulent documentation was provided to the respective government authorities in Europe.

#### GOOD PRACTICE

- **Information exchange with relevant law enforcement agencies** when instances of crime convergence are identified.

#### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Further and follow-up investigations** can be useful to help identify instances of crime convergence beyond an initial wildlife seizure event.



## CASE STUDY

4

### COMMODITIES INVOLVED

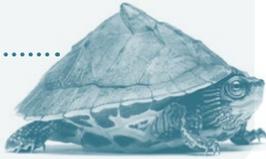
Live reptiles and fraud

### CONVERGENCE TYPOLOGY

Unconfirmed – possibly complete “career shift”

### GEOGRAPHIC REGION

South Asia



During its previous multi-year investigation into the illegal trade in live turtles and tortoises within Asia, the Wildlife Justice Commission had identified a Bangladeshi national who was part of a reptile smuggling network operating between India, Bangladesh, and Thailand.

In May 2019, Wildlife Justice Commission operatives received new intelligence indicating that this individual was now involved in setting up and operating “scam call centres” that were illegally obtaining personal information of customers from various companies located in the United States, United Kingdom, Ireland, and Australia.

Workers from the call centres would contact the customers and use a variety of false pretences to attempt to extract money from them. Victims were requested to send money to a local bank account, where it was remitted to Thailand. The money was then sent either to Bangladesh or India via hawala transactions.<sup>23</sup>

It is believed the scam call centre business is currently more profitable than previous turtle and tortoise trafficking activities, although it requires a considerably larger network of operations and initial cost outlay. While the method by which money is transferred back to the principles is similar to the method used to transfer money between countries for transactions involving illegal wildlife, it is unlikely to account for the convergence in this case.

Information on the identity of members of this network and evidence in relation to the illegally obtained company data was provided to the respective government authorities.

Every year millions of people worldwide collectively lose billions of dollars to scam callers offering wide-ranging fraudulent “services” and schemes to gain money. These are particularly difficult crimes to investigate and prosecute due to the victims being located in another country to

<sup>23</sup> Hawala is an informal ‘underground’ method of transferring money without any physical money movement taking place. Transactions are arranged through a network of hawala dealers, based on trust and balancing books.

the scam operations, and evidence from the victims is needed to bring charges. Jim Browning is the Internet alias of a software engineer who focuses on scambaiting and uncovering scam call centres. One of his most prominent exposés involved hacking into the computer system and CCTV camera network of a call centre in India to collect extensive evidence of their scam operation which was charging thousands of British victims hundreds of pounds to fix non-existent computer problems.<sup>24</sup> Browning's work triggered a BBC investigation and a raid on the centre by the Indian police, which resulted in the arrest of the call centre owner in March 2020.<sup>25</sup>

### GOOD PRACTICE

- **Information exchange with relevant law enforcement agencies** when instances of crime convergence are identified.

### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Further and follow-up investigations** can be useful to help identify instances of crime convergence beyond an initial wildlife seizure event.

<sup>24</sup> Jim Browning (2020), Spying on the Scammers series, accessed at: <https://www.youtube.com/watch?v=le71yVPh4uk&feature=youtu.be>

<sup>25</sup> <https://www.bbc.com/news/technology-51740214>



## CASE STUDY

5

### COMMODITIES INVOLVED

Wildlife (various) and gold/precious stones

### CONVERGENCE TYPOLOGY

Diversification of commodities

### GEOGRAPHIC REGION

Various



**Over the years**, the Wildlife Justice Commission has identified many instances of criminal networks involved in large-scale wildlife trafficking that are also involved in smuggling gold and precious stones in the black market. Although information in these cases is limited as the Wildlife Justice Commission has not pursued any further investigation into the smuggling of precious metals and stones, the volume of instances points to this potentially being a notable convergence typology in certain geographic locations. Some examples recorded by the Wildlife Justice Commission include the following:

- **In September 2017**, intelligence was received that an Indian national from Chennai who was involved in smuggling tortoises and turtles was also involved in smuggling gold from the Middle East to India. It was

stated that this trade had become lucrative due to the amount of money that could be made by avoiding customs duty on gold brought into India from abroad.

- **In June 2018**, Wildlife Justice Commission operatives identified a suspect in Kenya who claimed to be able to supply illegal ivory. The case did not progress as the suspect had reportedly sold the ivory before resources could be deployed to corroborate the intelligence and investigate further. However, analysis on this suspect indicated he was also involved in the procurement and sale of gold, although the exact nature of his role in the industry was not known.
- **Information was obtained** during an investigation in October 2018 that a Congolese national in Uganda was able to supply both ivory and gold. Both commodities were suspected to be sourced from the Democratic Republic of Congo and it is believed that they were smuggled to buyers in Uganda.
- **Operatives identified** a suspect in Malawi in November 2018 who was involved in ivory trafficking as well as the illegal mining and subsequent illegal export of precious and semi-precious stones. It is believed that the ivory and stones were moved through the same transportation channels to customers in Asia.
- **In March 2019**, the Wildlife Justice Commission received intelligence that a West African criminal network operating across Nigeria and several oth-

er countries in the region were involved in the procurement and supply of ivory as well as smuggling of gold. The network was believed to be using the movement of gold to fund procurements in its wildlife business and as a method to conceal cross-border financial transactions.

- **In April 2020**, operatives identified a Nigerian suspect who was involved in the supply of large-scale quantities of ivory and pangolin scales and transportation of these products to multiple Asian destinations. This suspect was also able to source other valuable commodities, including gold.

**There have been anecdotal reports** of an increased convergence between several illicit commodity trades in South Africa, including gold, chrome, copper, and rhino horn.<sup>26</sup> There is an apparent convergence in the smuggling methods for gold bars and rhino horns, with gold bars commonly smuggled in hand luggage on flights from South Africa to Dubai,<sup>27</sup> which is also how rhino horn is often moved before travelling on to destinations in Asia. Cash, gold bars, and precious stones were also reported to be among the products seized by USFWS officials in a 2012 rhino horn trafficking case in the United States.<sup>28</sup> It is possible that these commodities are used to hide illicit proceeds when smuggling wildlife commodities or could be used in exchange for payments of products. For example, in the shark fin trafficking case

study in this report, the illicit proceeds were deposited into third-party business accounts that dealt in gold, precious metals, and jewels, to hide the illegal activities (see Case Study 7).



*Image 7: USFWS officials seized more than USD 2 million in cash, gold bars and precious stones, along with rhino horns and other wildlife products in a 2012 case. Credit: USFWS.*

## INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Organised crime group mapping** is a technique to assess the level of criminality of a group and prioritise investigation efforts on those groups that pose the greatest threat. As this technique is focused on networks, it lends itself well to identifying convergence and groups that are involved in a variety of different crimes.

<sup>26</sup> <https://www.businesslive.co.za/fm/features/2020-12-03-inside-sas-heist-culture-gold-guns-and-gangs/>

<sup>27</sup> <https://www.dailymaverick.co.za/article/2021-02-11-dubai-to-crack-down-on-gold-smugglers-travelling-to-the-emirate-state-via-south-africa/>

<sup>28</sup> <https://www.latimes.com/local/la-xpm-2013-may-15-la-me-rhino-horns-20130516-story.html>

## CASE STUDY



### COMMODITIES INVOLVED

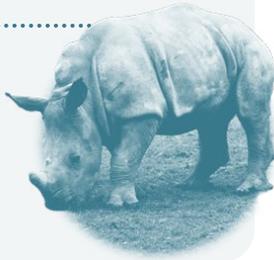
Rhino horns and various fraud and smuggling crimes

### CONVERGENCE TYPOLOGY

Opportunistic convergence

### GEOGRAPHIC REGION

Europe



**The Rathkeale Rovers** are an organised crime network of “travelling traders” based in Ireland but operating internationally across a range of criminal activities including fraud, money laundering, drug smuggling, and art theft. They are particularly notorious for their fraudulent schemes which have included trading in bogus electrical goods, counterfeit antiques, and tarmacking scams.<sup>29</sup> The Rathkeale Rovers are a classic example of a diversified network that actively seeks new criminal opportunities to exploit.

**As rhino poaching began** to escalate in South Africa from 2010 due to the high demand and high prices rhino horn commanded in the black markets in Asia, the Rathkeale Rovers master-minded an opportunity to exploit this trade from Europe. The group was behind a spate of organised robberies at museums, zoos, and auction houses across Europe targeting

the theft of rhino horns and mounted rhino heads worth millions of Euros between 2010 to 2013.<sup>30</sup> During this period, 58 theft incidents involving 95 rhino horns occurred in Germany, France, Portugal, United Kingdom, Italy, the Netherlands, and Ireland. Europol coordinated a large joint investigation called Operation Oakleaf to tackle the thefts, with the participation of law enforcement agencies from 17 countries. In total, 31 members of the Rathkeale Rovers were arrested.<sup>31</sup> During the sentencing of 14 members of the group that had been arrested in the United Kingdom in April 2016, it was described as an “extremely sophisticated conspiracy”.<sup>32</sup> None of the stolen horns were recovered and all are believed to have been trafficked to Asia. Several rhino horn trafficking cases involving the Rathkeale Rovers were also linked to the United States.<sup>33</sup>



*Image 8: The horn from a black rhino was stolen from the Museum in Ritterhaus in Offenburg, Germany. Credit: AFP/Getty Images.*

<sup>29</sup> <https://www.sundayworld.com/crime/world-crime/from-africa-to-iceland-norway-to-new-zealand-rathkeale-rovers-travellers-have-dealt-in-everything-from-tarmac-to-rhino-horn-40059841.html>

<sup>30</sup> <https://www.irishmirror.ie/news/irish-news/crime/irish-sunday-mirror-investigates-irish-2274088>

<sup>31</sup> <https://www.europol.europa.eu/about-europol/europol-20-years/europol-20-years-most-noteworthy-operations>

<sup>32</sup> <https://www.independent.ie/irish-news/courts/rathkeale-rovers-gang-members-jailed-over-multi-million-euro-rhino-horn-spree-34597780.html>

<sup>33</sup> <https://www.irishtimes.com/news/crime-and-law/member-of-rathkeale-rovers-jailed-for-rhino-horn-smuggling-1.3292633>



*Image 9: Ten of the 14 Rathkeale Rovers who were arrested and convicted in the United Kingdom. Credit: Durham Police/ PA Wire.*

**The robberies prompted** many museums and other institutions across Europe to increase the security of their exhibits and remove rhino horns from display. As a result of these increased security measures and the successful law enforcement response there have not been any further thefts of rhino horn from museums or other institutions, highlighting the opportunistic nature of convergence in this case. However, the group continues to operate and expand into other lines of criminal activity and has most recently been reported to be trading in forged negative COVID-19 test certificates.<sup>34</sup>

#### GOOD PRACTICE

- **International cooperation** on a large, joint law enforcement operation to investigate widespread crimes which were linked by a similar pattern of modus operandi.

#### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Intelligence analysis and organised crime group mapping** in this type of case are useful techniques to identify and map out members of the criminal network who may be dispersed across many countries and to tackle the problem from an organised crime point of view.

<sup>34</sup> <https://www.irishtimes.com/news/crime-and-law/irish-gang-forging-negative-covid-19-tests-for-european-travellers-europol-warns-1.4473032>



## Fisheries crime

### CASE STUDY

7

#### COMMODITIES INVOLVED

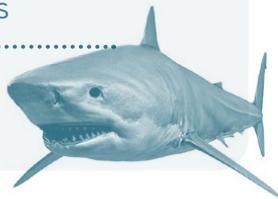
Shark fins and illicit drugs

#### CONVERGENCE TYPOLOGY

Diversification of commodities

#### GEOGRAPHIC REGION

North America and East Asia



In September 2020, the multi-agency investigation Operation Apex was initiated by the USFWS and the DEA under the umbrella of the Organised Crime Drug Enforcement Task Force. It targeted and shutdown an international syndicate that was allegedly engaged in trafficking shark fins from Mexico to Hong Kong SAR, drug trafficking in the United States, and money laundering. The indictment in Operation Apex charged 12 defendants and two businesses with drug trafficking conspiracy, money laundering conspiracy, and conspiracy to commit wire fraud and mail fraud.<sup>35</sup>

**Shark finning** is the practice of catching sharks at sea, cutting off their fins and throwing the injured shark back into the ocean to die. Shark fins are one

of the most valuable seafood products and mostly used in shark fin soup, a popular delicacy in many parts of Asia. Shark finning is estimated to account for around 73-100 million shark deaths per year.

**The conspiracy began** as early as 2013. It is alleged the defendants operated a business in California dealing in shark fins smuggled from Mexico, in violation of U.S. federal and state law, which then exported multi-tonne shipments of dried shark fins to Hong Kong SAR. The defendants also purportedly used a seafood front business in Florida, where under state law licensed dealers are permitted to trade in shark fins under certain conditions. Fake invoices and paperwork were created to make it appear that the Florida business was invoicing and financing the shark fin business and dozens of bank accounts were used to hide the millions of dollars in proceeds. During the operation, agents also seized 18 totoaba swim bladders. The totoaba is a large, critically endangered fish found only in the Gulf of California in Mexico, and its swim bladder is also a highly valuable product in the Asian black market.<sup>36</sup>

**The network members** were also allegedly shipping hundreds of kilograms of marijuana inter-state from California. The indictment claims that couriers were paid shipping fees to take bundles of USD 1-2 million in cash, or sometimes smaller amounts, to be laundered. The proceeds from the shark fin and drug trafficking were deposited into third-party business accounts that dealt in gold, precious

<sup>35</sup> <https://www.justice.gov/usao-sdga/press-release/file/1313441/download>

<sup>36</sup> <https://www.justice.gov/usao-sdga/pr/international-money-laundering-drug-trafficking-and-illegal-wildlife-trade-operation>

metals, and jewels, located in the United States, Mexico, and Hong Kong SAR, to hide the illegal activities.

**This case demonstrates** the benefits that a multi-agency investigation can bring to effectively address all aspects of crime convergence when a criminal network is dealing in diverse illicit commodities.



*Image 10: Shark fins and totoaba swim bladders were among the items seized.  
Credit: U.S. Attorney Southern District of Georgia.*

### GOOD PRACTICE

- **Multi-agency investigation** enabled collaboration between specialised law enforcement agencies and brought together the expertise and resources needed to tackle crime convergence in this case.
- **Use of alternative legislation** that can be applied to the criminal scenario where relevant, to tackle transnational, organised wildlife crime. It is notable that although shark fin trafficking was a significant part of the offending of this criminal network, the charges in the indictment related to drug trafficking and other ancillary offences.
- **Financial investigation** conducted in parallel to the predicate offence to identify any associated money laundering offences, payment methods, and the proceeds of crime to facilitate asset recovery.

### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **International cooperation and controlled delivery** to identify and further investigate network members who are located in other countries and involved further along the supply chain in buying and distributing the illicit commodities.

## CASE STUDY

8

### COMMODITIES INVOLVED

Abalone and illicit drugs

### CONVERGENCE TYPOLOGY

Transactional convergence of illicit commodities

### GEOGRAPHIC REGION

Southern Africa



**In many parts of Asia**, abalone is another highly sought-after seafood delicacy. In South Africa, the illegal trade in abalone to supply the high demand in Asian markets is driving a severe decline in stocks of the shellfish and drawing local fishing communities into the criminal underworld. More than 96 million individual abalone are estimated to have been poached in the 10 years from 2006-2016, with 90% of them sent to Hong Kong SAR.<sup>37</sup>

**The illicit abalone trade** in South Africa is largely controlled by Chinese criminal groups, who source their product from local gangs operating in fishing settlements close to known poaching sites. The abalone is typically dried in illegal processing facilities in South Africa, before being transported across the border by truck into Namibia, Zimbabwe, or Mozambique, with abalone hidden in false compartments

or among boxes of other products such as dried fruit. From there, it is exported to Hong Kong SAR.<sup>38</sup> In June 2020, South African police and environmental officials busted an illegal abalone processing facility in Western Cape province, arresting two suspects and seizing abalone worth over ZAR 5.4 million (equivalent to approximately USD 374,000).<sup>39</sup>

**Shipments of illegal abalone** are reportedly often exchanged for drugs such as methamphetamine or its chemical precursors, embedding the trade within South Africa's drug economy.<sup>40</sup> This type of barter is an example of transactional convergence, occurring when criminal groups in different markets purchase or exchange goods or services with each other.<sup>41</sup> Although this abalone-for-drugs criminal trade has been widely reported in South Africa by multiple sources, there is a dearth of specific cases of seizures or arrests involving both commodities, indicating that this convergence may not yet be effectively targeted by law enforcement authorities.

**One linked case** that was recently reported in July 2020 involved the seizure of 41 rhino horns at OR Tambo International Airport in Johannesburg from a shipment declared as "fine art", which was destined for Malaysia. A further search of the warehouse led to the discovery of abalone worth an estimated USD 66,000 destined for Hong Kong SAR and approximately USD 40,000 worth of the drug

<sup>37</sup> TRAFFIC (2018), *Empty Shells: An assessment of abalone poaching and trade from southern Africa*, accessed at: [https://www.traffic.org/site/assets/files/11065/empty\\_shells.pdf](https://www.traffic.org/site/assets/files/11065/empty_shells.pdf)

<sup>38</sup> <https://www.theguardian.com/environment/2018/aug/19/poachers-abalone-south-africa-seafood-divers>



*Image 11: In June 2020, Police and environmental officials busted an illegal abalone processing facility in Western Cape province, seizing abalone worth over ZAR 5.4 million. Credit: Pixabay*

ephedrine hidden in a shipment of printer cartridges destined for Madagascar.<sup>42</sup>

**The illegal abalone trade** also exists alongside the legal commercial trade in wild-caught and farmed abalone, providing the potential for convergence between licit and illicit markets. This is particularly the case once the product is outside of South Africa, as many key transit and destination countries along the supply chain do not have the legal provisions to recognise illegally sourced abalone, while the main abalone species being exploited<sup>43</sup> is not listed by CITES.

**Corruption is also known** to be closely linked to South Africa's abalone black market. In May 2018, nine fisheries officials were arrested for colluding with poachers,<sup>44</sup> while two top officials in the fisheries department have also been involved in separate scandals including rigging auctions of confiscated abalone and sabotaging an investigation into an abalone syndicate.<sup>45</sup>

#### GOOD PRACTICE

- **Anti-corruption:** Some instances of official corruption associated with illegal abalone in South Africa have been investigated and suspects arrested.

#### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Anti-corruption:** Continuing allegations of high-level corruption indicate the need for a systemic approach to identify and mitigate corruption vulnerabilities in this sector.
- **Organised crime group mapping** would be a useful technique to help identify those criminal networks who are involved in a variety of different crimes and enable law enforcement to focus resources more efficiently on targeting those groups posing a higher criminal threat.

<sup>39</sup> <https://www.thesouthafrican.com/news/abalone-poaching-in-south-africa/>

<sup>40</sup> <https://globalinitiative.net/analysis/abalone-poaching/>

<sup>41</sup> Management Systems International (2020), *Strengthening the Rule of Law Approaches to Address Organised Crime: Criminal Market Convergence*, accessed at: <https://globalinitiative.net/wp-content/uploads/2020/03/ROL-and-OC-White-Paper-4-Criminal-Market-Convergence-March-2020.pdf>

<sup>42</sup> <https://www.timeslive.co.za/news/south-africa/2020-07-14-rhino-horn-worth-r115m-disguised-as-fine-art-seized-at-or-tambo-airport/>

<sup>43</sup> *Haliotis midae*

<sup>44</sup> <https://www.news24.com/news24/SouthAfrica/News/marine-inspectors-bust-for-allegedly-aiding-abalone-syndicate-20180306>

<sup>45</sup> <https://www.groundup.org.za/article/fisheries-department-rots-top/>

## CASE STUDY

9

### COMMODITIES INVOLVED

Fish and human trafficking/  
modern slavery

### CONVERGENCE TYPOLOGY

Transactional convergence

### GEOGRAPHIC REGION

Southeast Asia



**Revelations of modern slavery** in the fishing industry first emerged in Thailand in 2014, exposing so-called “slave ships” that stayed out at sea for years at a time, trading slaves from one boat to another and serviced by cargo boats that collected the catch and dropped off supplies. Investigations traced the supply chain of seafood caught by these boats to many global retailers and supermarkets in the United States, Europe, and the United Kingdom.<sup>46</sup>

**These media reports** sparked a multi-agency investigation by Indonesian authorities including immigration, fisheries and police, into Pusaka Benjina Resources, one of the largest fishing companies in eastern Indonesia. Pusaka Benjina operated dozens of boats suspected to be Thai-owned with Thai captains and foreign fishing crews.<sup>47</sup>

**The investigation** found that at least 1,456 crew members comprising 1,205 foreigners and 251 Indonesians were forced to work very long hours in abusive conditions with no pay. The foreigners had been recruited in Thailand —many were smuggled migrants from Myanmar and Cambodia who had paid brokers to help them find work and passage in Thailand and were then sold to boat captains— and brought to Indonesia using fake immigration papers and seamen books.<sup>48</sup> This recruitment strategy is indicative of a transactional convergence typology, with one criminal group supplying a service or good to another.

**Apart from the labour** and immigration crimes, investigators also found other issues connected with the case including bribery, corruption, forgery of license and other documents, money laundering, various tax-related crimes, and fisheries offences. Of the 200 boats identified in Pusaka Benjina’s fishing fleet, only 68 had fishing permits. In June 2015, the Indonesian government announced it had revoked Pusaka Benjina’s license and banned it from any further fishery activities.<sup>49</sup>

**Three Indonesian employees** and five Thai boat captains were convicted in March 2016 and each sentenced to three years imprisonment and ordered to pay a fine equivalent to approximately USD 12,250. The five Thai captains were additionally ordered to pay a total of USD 67,800 in compensation

<sup>46</sup> <https://www.theguardian.com/global-development/2014/jun/10/-sp-migrant-workers-new-life-enlaved-thai-fishing>

<sup>47</sup> <https://www.thejakartapost.com/news/2015/05/13/indonesian-police-arrest-7-seafood-slavery-case.html>

<sup>48</sup> <https://www.thejakartapost.com/news/2015/05/09/police-have-20-possible-suspects-benjina.html>

<sup>49</sup> <https://www.thejakartapost.com/news/2015/06/23/govt-revokes-licenses-six-major-fishing-firms.html>



*Image 12: In April 2015, foreign fishing crew at the Pusaka Benjina Resources compound raise their hands as they are asked who wants to go home. Credit: Dita Alangkara/AP.*

to their crew members.<sup>50</sup> Although the investigation and conviction are seen as a success for Indonesia in taking steps to clean up its fishing industry and address organised crime, many victims and observers have complained that the penalties were not commensurate with the crimes and suffering inflicted on thousands of people over many years.

**Following this case**, in October 2015 Indonesia established the Presidential Task Force to Combat Illegal Fishing (Task Force 115) as a multi-agency task force dedicated to investigating illegal fishing and its convergence with other serious crimes, reporting directly to the President.<sup>51</sup>

**Related forms** of convergence are evidently ongoing in the global fishing industry, with a new case of abuse of fishing crew reported as recently as February 2021. An investigation by the Advocate for Public Interest Law and the Environmental Justice Foundation alleged that more than half of the migrant workers interviewed who crewed South Korea's distant water fishing fleet were forced to work in excess of 18 hours a day, and almost all workers reported that they had their passports confiscated by their captain and several months wages deducted at the start of contracts to discourage them from leaving or escaping.<sup>52</sup>

<sup>50</sup> <https://www.theguardian.com/world/2016/mar/11/seafood-slave-drivers-given>

<sup>51</sup> <https://setkab.go.id/en/president-jokowi-sets-up-task-force-to-fight-illegal-fishing/>

<sup>52</sup> <https://www.seafoodsource.com/news/environment-sustainability/investigation-reveals-worker-abuse-on-korean-fishing-vessels-exporting-to-us-e>



*Image 13: In April 2015, rescued Myanmar fishermen prepare to depart Benjina, Indonesia to return home. Credit: Dita Alangkara/AP.*

### GOOD PRACTICE

- **Multi-agency investigation** enabled collaboration between specialised law enforcement agencies and other relevant authorities, bringing together the expertise and resources needed to tackle crime convergence in this case.
- **An enduring multi-agency task force** was established to provide the necessary resources and mandate to investigate illegal fishing and convergence with other crimes in a targeted manner and on an ongoing basis.

### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Financial investigation** is particularly important in complex cases involving a variety of potential financial crimes that may be committed by individuals or legal entities. Financial investigation can help to identify the proceeds of crime to facilitate asset recovery, and in the event that funds are recoverable, these could be used to compensate the victims of crime.

## Timber crime

### CASE STUDY

10

#### COMMODITIES INVOLVED

Timber and illicit drugs

#### CONVERGENCE TYPOLOGY

Diversification of commodities

#### GEOGRAPHIC REGION

Southeast Asia and  
South America



**In Thailand** in October 2020, when officers from the Department of Special Investigation (DSI) raided the home of a deceased member of a drug network, they had been expecting to seize assets acquired from drug money. The deceased man had been connected to a THB 508 million drug case (equivalent to approximately USD 16.9 million). Instead, they discovered a stockpile of rare timber with an estimated value of THB 160 million (equivalent to approximately USD 5.3 million), including 409 planks of rosewood, 1,207 planks of blackwood, 170 planks of teak, and 17 planks of makha mong. Officers from the Royal Forest Department (RFD)

were called in to investigate the origin of the timber, which they suspected could be from protected areas in the northeast of Thailand. They believed it was likely the timber was being stored at the suspect's house while waiting to be exported. DSI and the RFD were jointly investigating the case to identify the convergence between the drug network and the timber, with DSI analysing the financial trail to try to find a link with a particular illegal timber harvesting gang.<sup>53</sup>

**It has separately been** reported that criminal groups in Thailand often pay illegal timber harvesters with methamphetamines. One forestry official stated that when timber harvesters are arrested, they are found in possession of yaba<sup>54</sup> "nearly 100%" of the time, with drugs being a way to pay for labour and to launder money.<sup>55</sup>

**The intersection** between timber and drugs is also seen in the Amazon region. Cocaine is often smuggled using the existing supply routes of the timber industry, with heavy timber trucks discretely carrying cocaine from forest production areas to commercial shipping areas. Timber truck searches are often avoided by drug enforcement agencies due to the high volume of timber trucks on logging roads, the large quantities and significant weight of the timber, and the amount of time a search would take.<sup>56</sup>

<sup>53</sup> <https://www.bangkokpost.com/thailand/general/2006027/drugs-case-leads-to-rare-wood-inquiry>

<sup>54</sup> Yaba tablets are an inexpensive mix of caffeine and methamphetamine.

<sup>55</sup> <https://chinadialogue.net/en/nature/the-guardians-of-siamese-rosewood/>

<sup>56</sup> <https://smallwarsjournal.com/jrnl/art/illicit-confluences-intersection-cocaine-and-illicit-timber-amazon>

**A major case** was reported in Peru in 2008 with the arrest of the mayor of Pucallpa, one of the most strategically important cities for Peru's timber trade. The investigation started in 2003 when Peruvian law enforcement discovered 523 kg of cocaine hidden in a plywood shipment and traced it back to one of the mayor's businesses. He was eventually arrested five years later in 2008 and alleged to have controlled the major drug trafficking routes from Peru to Brazil, using the logistical and commercial networks in his timber business to move the cocaine. Police seized a total of USD 71 million worth of assets whose origin could not be accounted for, including 34 properties, 44 boats, and 200 vehicles, indicating how lucrative this timber-drug network was.<sup>57</sup>

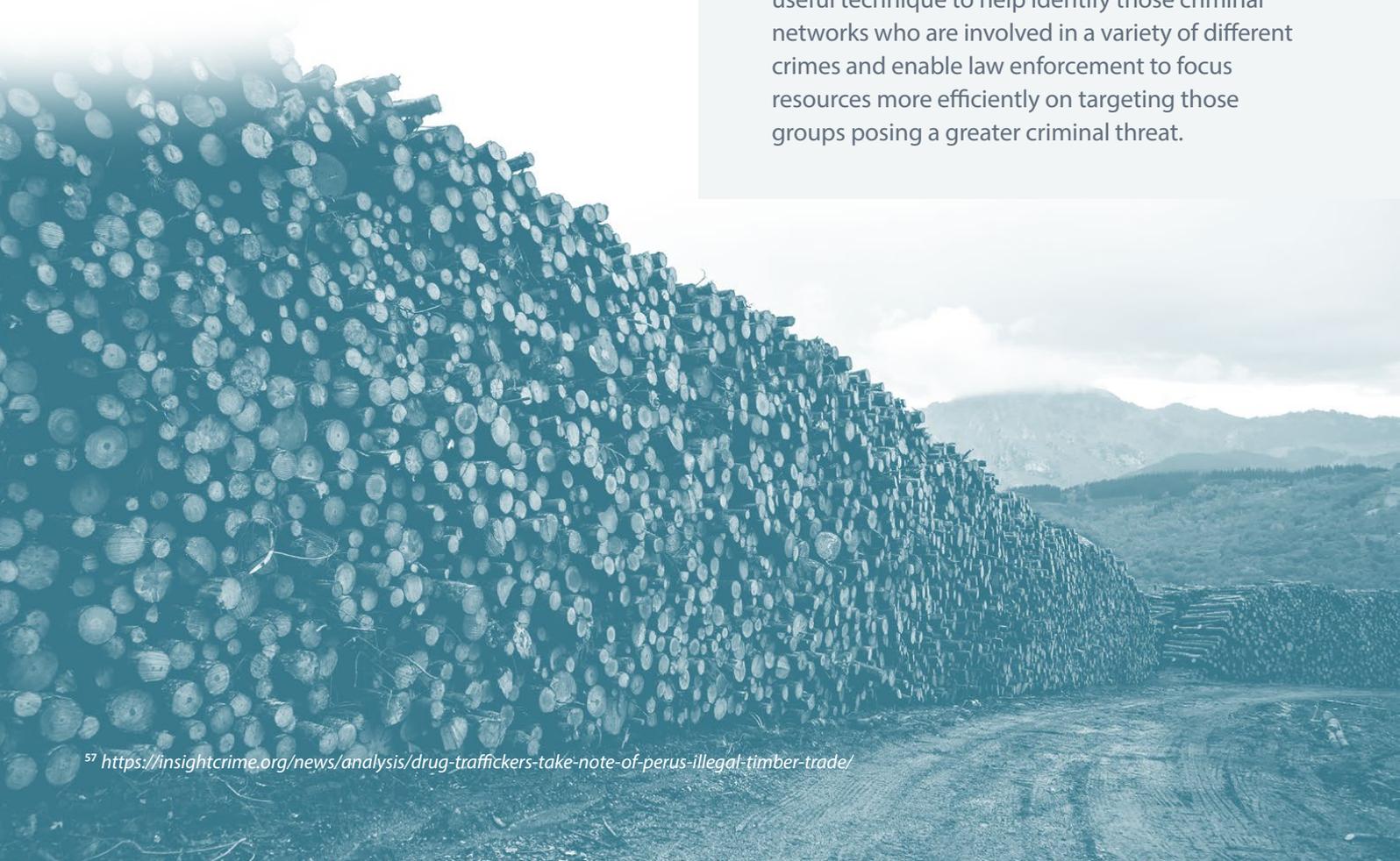
### GOOD PRACTICE

- **Initiating a joint investigation** (between DSI and RFD) upon the discovery of other illicit commodities connected to the key suspect, to identify the nature of the convergence.
- **Conducting financial investigation and following the money trail** (in the Peru case) to identify illicit proceeds and assets and facilitate asset recovery.

### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Organised crime group mapping** would be a useful technique to help identify those criminal networks who are involved in a variety of different crimes and enable law enforcement to focus resources more efficiently on targeting those groups posing a greater criminal threat.

<sup>57</sup> <https://insightcrime.org/news/analysis/drug-traffickers-take-note-of-perus-illegal-timber-trade/>



## CASE STUDY

11

### COMMODITIES INVOLVED

Timber, corruption, and fraud

### CONVERGENCE TYPOLOGY

Embedded convergence where the crime types are inextricably linked

### GEOGRAPHIC REGION

South America



**The largest illegal timber case** in Peru demonstrates deep and systemic connections between illegal timber and fraud, with official documents containing false information used to launder timber that was allegedly illegally harvested. During 2015, the Yacu Kallpa container ship moved over 1,312 m<sup>3</sup> of illegal timber obtained in the Peruvian Amazon that was taken from indigenous communities, farming families and government lands, equivalent to the full freight capacity of 60 semi-trailers.<sup>58</sup>

**The shipment** was destined for Houston, United States, and in November 2015 on the morning it was set to depart Peru, a public prosecutor boarded the ship and attempted to seize 15% of the timber that investigators had proven was of illegal origin. The seizure attempt met with complications that allegedly resulted in an agreement with the captain

that he would return with the illegal 15% portion after delivering the rest of the cargo, and the ship left port the next day. However, the investigation continued, visiting the locations cited in the timber certificates to verify its extraction.

**Meanwhile**, the ship travelled to the Dominican Republic where some cargo was unloaded, and then on to Tampico, Mexico, where it was detained at the end of January 2016. By this time investigators had found that 96% of the original cargo was “not of legal origin”. The companies exporting the timber denied any knowledge of illegality, pointing to their official certification documents and claiming to have purchased the timber in good faith. The companies’ claims were supported by several top-level politicians; however, investigators working for the NGO Global Witness



*Image 14: The largest illegal timber case in Peru demonstrated deep and systemic connections between illegal timber and fraud.*

*Credit: Environmental Investigation Agency.*

<sup>58</sup> <https://news.mongabay.com/2017/11/videos-detail-corruption-in-massive-illegal-peruvian-timber-case/>

had collected undercover video evidence of executives from several of the export companies revealing that at least some of them, and possibly all, were well aware that the timber was illegal but felt protected by their ability to obtain fraudulent official documents.<sup>59</sup> It was later reported that Mexican authorities eventually released the shipment, giving in to diplomatic pressure and lobbying from the timber industry. The timber allegedly ended up in the United States via several Mexican companies that sent it to their subsidiaries based there.<sup>60</sup>

**The investigation in Peru** led to 52 cases involving more than 100 defendants, which are still in the process of prosecution five years later. It also exposed several methods by which illegal timber is laundered into the legal supply, all of which rely on the participation of corrupt regional government officials who are responsible for approving all harvesting plans and permits. One of the methods involved purchasing timber from areas where logging is not permitted, using false certification documents identifying it as being from a legal concession. Linked to this method, harvesting plans could be drawn up by corrupt forestry consultants who fake the tree locations to make it appear as though they are within legal concession boundaries.

**Another method** exploited designated “local forest” areas, which allow small quantities of timber to be taken by local communities for self-subsistence

and local infrastructure purposes. However, investigators discovered that instead, most of the logging occurring in many of the local forests was actually large-scale and for commercial purposes.

#### GOOD PRACTICE

- **Collaboration between law enforcement authorities and NGOs** in sharing intelligence, conducting joint investigations, and collecting evidence.
- **Use of specialised investigation techniques** such as undercover operations to gather evidence and build a strong case for prosecution.
- **Conducting further and follow-up investigations** to help uncover the full extent of criminality linked to the case.

#### INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Anti-corruption:** The various methodologies for laundering illegal timber revealed during this investigation indicate the need for a systemic approach to identify and mitigate corruption vulnerabilities in the forestry sector.

<sup>59</sup> <https://insightcrime.org/news/analysis/report-exposes-inner-workings-timber-trafficking-peru/>

<sup>60</sup> <https://ojo-publico.com/especiales/madera-ilegal/del-sur-al-norte-la-ruta-del-trafico-de-madera-del-amazonas/>

## CASE STUDY

# 12

### COMMODITIES INVOLVED

Timber, corruption, and money laundering

### CONVERGENCE TYPOLOGY

Embedded convergence where the crime types are inextricably linked

### GEOGRAPHIC REGION

Southeast Asia



**Abdul Taib Mahmud** has been touted as the richest individual in Malaysia, with his personal wealth estimated to be at least USD 15 billion.<sup>61</sup> He held the position of Chief Minister of Sarawak for more than 30 years from 1981 to 2014, during which time he is alleged to have controlled a network of companies involved in illegal logging. Taib was not only the Chief Minister, but also concurrently Sarawak's Minister of Finance and Minister of Planning and Resource Management, giving him enormous political power as well as absolute control over the allocation of timber licenses and logging concessions. He was additionally chairman of the Sarawak Timber Industry Development Corporation, the regulatory body for the logging industry which was also heavily involved in logging.<sup>62</sup>

**Already by the late 1980s**, Taib's family members and close associates were estimated to control over 1.6 million hectares of timber concessions in Sarawak constituting more than 10% of the state's land. Taib and his wider family are regularly accused of corruption and personally benefiting from Sarawak's natural and economic resources. Several formal complaints against Taib of alleged corruption and abuse of power have been lodged with police and the Malaysian Anti-Corruption Commission (MACC) over the years.<sup>63</sup>

**Taib has been linked** to various timber scandals, including a 2007 case when Japanese tax authorities revealed that Japanese shipping companies exporting timber from Sarawak had paid tens of millions of US dollars in illegal, secret kickbacks to Hong Kong companies linked to Taib's brother. In 2008, an Indonesian newspaper implicated Taib in a timber scam involving around 30 shipments of illegal Indonesian logs being imported into Sarawak every month and re-exported to other countries. According to investigation findings published by the NGO Bruno Manser Fund (BMF) in 2012, Taib and his family members are alleged to have amassed illegally acquired assets worth billions of dollars in Malaysia, Canada, United Kingdom, Australia, and the United States, among others, and stakes in over 400 companies worldwide.<sup>64</sup>

<sup>61</sup> <https://www.malaysiakini.com/news/209353>

<sup>62</sup> <https://news.mongabay.com/2011/03/report-corruption-in-sarawak-led-to-widespread-deforestation-violations-of-indigenous-rights/>

<sup>63</sup> <https://www.malaysiakini.com/news/484233>

<sup>64</sup> Bruno Manser Fund (2012), *The Taib Timber Mafia: Facts and Figures on Politically Exposed Persons from Sarawak, Malaysia*, accessed at: [https://www.brunomanser.ch/upload/berichte/bmf\\_taib\\_family\\_report\\_2012\\_09\\_20\\_2.pdf](https://www.brunomanser.ch/upload/berichte/bmf_taib_family_report_2012_09_20_2.pdf)

In June 2011, the MACC announced that Taib was under investigation for allegations of timber corruption, following the Swiss authorities opening an investigation in May 2011 and freezing his assets held in Swiss banks.<sup>65</sup> A few months later, German authorities followed suit and announced an investigation into corruption and money laundering relating to Taib and his connections with Deutsche Bank.<sup>66</sup> Allegations were also raised of AUD 30 million of corrupt proceeds relating to Taib's business activities being laundered through the Australian real estate market<sup>67</sup> and CAD 29 million laundered through the Canadian real estate market.<sup>68</sup>



Image 15: In June 2011, the MACC announced that Taib was under investigation for timber corruption, but in 2014 found he had not abused his position. Credit: Malaysiakini.

**Despite the evidence** raised in these allegations, enormous personal wealth gained while earning a modest government salary, repeated corruption complaints, and numerous investigations conducted across several countries, Taib's high-level political power has ensured he remains protected and no formal charges of corruption or money laundering have been laid against him. In 2014, the MACC found that Taib had not abused his position for corruption because approvals of land and logging areas were made by other ministers or the Sarawak cabinet rather than Taib himself.<sup>69</sup> However, amid international pressure, Taib resigned from the role of Chief Minister in 2014 and was instead appointed as Governor of Sarawak – a largely ceremonial position but still within the halls of power.<sup>70</sup> This case demonstrates the potential for timber crime to be linked to government officials at the highest levels, and the complexity of investigating such cases even where clear evidence exists due to the power and influence they can command.

## GOOD PRACTICE

- **International cooperation** to investigate complex, high-level political corruption and money laundering allegations in response to an NGO investigation (even though they were unable to achieve a successful result).

<sup>65</sup> <https://www.sarawakreport.org/2011/05/swiss-president-orders-an-investigation-into-taibs-assets-exclusive/>

<sup>66</sup> <https://web.archive.org/web/20150411092506/>, <http://www.sarawakreport.org/2011/09/taib-probe-opens-in-germany-breaking-news/>

<sup>67</sup> <https://www.michaelwest.com.au/allegations-family-of-malaysian-billionaire-taib-mahmud-laundered-money-in-australia/>

<sup>68</sup> <https://www.michaelwest.com.au/banks-and-audit-firm-sued-over-taib-mahmud-money-laundering/>

<sup>69</sup> <https://web.archive.org/web/20140302064255/>, <http://www.themalaysianinsider.com/malaysia/article/no-proof-of-taib-power-abuse-as-sarawak-ministers-had-approved-land-for-his>

<sup>70</sup> <https://thediplomat.com/2014/03/taib-mahmuds-really-excellent-retirement/>

## Analysis and discussion

**The 12 case studies** indicate different types of organised crime and illicit commodities that have been observed to converge with wildlife crime, as well as different ways in which convergence can occur. They demonstrate that criminal groups may have a range of motivations to diversify their activities and engage in wildlife or other types of crime.

*The case studies in this report demonstrate that criminal groups may have a range of motivations to diversify their activities and engage in wildlife or other types of crime.*

**Convergence can occur** opportunistically on an ad-hoc basis, such as heroin trafficking in the Kromah case; as a suspected complete “career shift” in response to changing conditions, such as the Bangladeshi reptile trafficker now involved in scam call centres; or as part of a diversification strategy to maintain flexible criminal operations, such as organised robberies of rhino horns from museums in the Rathkeale Rovers case. Convergence can also be transactional when criminal groups in different markets purchase or exchange goods or services

with each other, such as timber poachers in Thailand who may be paid partly with drugs, or the illegal abalone traders in South Africa who exchange shipments for methamphetamine or chemical precursors. Convergence can also be embedded to such an extent that the crimes are inextricably linked, and neither crime could take place without the “support” of the other, such as in the systemic corruption and fraud underpinning illegal logging and timber trafficking in Peru.

**Transnational crimes** can also become highly connected as criminal groups seek to become involved in various types of smuggling – as it is often their access to transport routes and the transit itself, rather than the product, that is the most valuable commodity. Given this, focusing on identifying and mapping the trafficking network and assessing its vulnerabilities is key to address crime convergence.

**The following observations** can be drawn from the case studies, which could assist law enforcement agencies and policy makers to better understand and address the convergence of wildlife crime with other serious crimes.

## Common facilitating factors: Bribery and corruption

**Corruption is a major driver** of all forms of wildlife crime involving terrestrial wild animals, fisheries, and timber, facilitating illegal poaching or harvesting, transportation, processing, and sale of products at every step of the supply chain. It also creates a significant advantage in favour of trafficking networks over law enforcement agencies who are investigating these crimes, as corrupted officials protect traffickers from criminal justice and hinder investigative efforts.

**Examples of bribery** and corruption can be overtly seen in the majority of the 12 case studies, but undoubtedly would also be covertly present in a high proportion of cases to facilitate the movement of products across borders. It is most formidable in timber and fisheries crime cases, where corruption relating to the provision of fishing licenses and logging concessions can extend to the highest levels of government. Its ability to stymie cases in court is evident in the both the Kromah and Akasha cases, and the role it can play in selling back seized goods or sabotaging investigations can be seen in the illegal abalone trade case. As a result, corruption goes far beyond simply being a convergence crime, as it

is a common underlying factor present in almost every case. Therefore, in order to counter any form of wildlife crime, corruption must be addressed.

*In order to counter any form of wildlife crime, corruption must be addressed.*

## Common resulting crime: Money laundering

**Wildlife crime** is a lucrative industry that is attractive to organised crime groups because of the potential to enjoy large profits with relative impunity. The high prices and high returns that some wildlife products command in illicit markets, such as rhino horn and ivory, indicate the existence of significant illicit financial flows that may be laundered in various ways to disguise their illegal origin. Money laundering is a common resulting crime linked to any proceeds-generating crime; however, not many countries conduct financial investigations to identify the proceeds of crime or possible money laundering offences related to wildlife crime.

**The United States** is one of the few countries that does, which is demonstrated by two of the case studies where money laundering charges were included in the indictments – the Kromah case and the shark fin trafficking case. Another two cases indicated the presence of money laundering crimes although no such formal charges were laid – the Pusaka Benjina case in Indonesia and the timber scandals related to Abdul Taib Mahmud in Sarawak, Malaysia. “Following the money” is an under-utilised investigation technique that would provide an opportunity for law enforcement to identify, trace, freeze and seize the proceeds of wildlife crime and remove the financial incentive and expected reward for criminals.

## Opportunities for law enforcement agencies

### Easier entry point for investigation

**During investigations**, the Wildlife Justice Commission’s encounters have shown that in some cases wildlife criminals are not as operationally savvy as other types of organised criminals, making wildlife crime appear more like “disorganised” crime at times. This can be due to the fact that environmen-

tal crimes often have lower penalties and are not as highly prioritised or resourced by law enforcement compared to other types of organised crime, and the role played by corruption in providing “protection” to criminals so they feel more confident that they can act with impunity.

**As an example**, from 2016 to 2019 the Wildlife Justice Commission investigated a prominent Vietnamese wildlife broker, Nguyen Van Nam. His criminal career progressed rapidly during this time and by 2019 he had asserted his position as one of Vietnam’s top wildlife criminals and lead broker for a prolific network responsible for trafficking vast quantities of elephant ivory and rhino horn from Africa to China via Vietnam. Nguyen Van Nam was eventually arrested in Hanoi on 30 September 2019 in connection with the illegal trade of 204 kg of ivory, and on 16 July 2020 he was convicted and sentenced to 11 years in prison.<sup>71</sup> The Wildlife Justice Commission’s investigative findings clearly showed Nguyen Van Nam’s operations to be neither particularly sophisticated nor criminally shrewd. He regularly displayed poor criminal tradecraft, continuing to use the same phone number and requesting payments to the same bank accounts throughout the entire investigation. Nguyen Van Nam also regularly disclosed valuable information that revealed the inner workings of his operations, which is unusual

<sup>71</sup> <https://e.vnexpress.net/news/news/204-kg-ivory-haul-lands-three-traders-in-jail-4132021.html>

compared to top-level criminals in other crime types. This serves as a reminder that wildlife criminals can sometimes present an easier entry point for the investigation of organised crime.

**Similarly**, the unravelling of the Kromah network had much to do with the analysis of his phone records, which yielded evidence of several years of criminality while operating with the same phone number.

### Joint investigations to target convergence

**On the other hand**, the most serious wildlife crime cases sometimes go beyond the capacity of environmental police or wildlife authorities to handle alone, and this is particularly the case when they are converging with other forms of organised crime. As several of the case studies in this report show, convergence can be most effectively addressed through joint investigations and multi-agency task forces. A multi-disciplinary approach can offer up a range of alternative legislative options to explore all angles of the criminal scenario as well as alternative powers and expertise of other law enforcement agencies that may be better suited to complex, transnational investigations. It is notable that in several of the case studies in this report, wildlife trafficking charges were not laid despite clear evidence of wildlife trafficking offending —such

as the Akasha brothers' case and the shark fin trafficking case— with charges instead focusing on the convergent crime and ancillary offences. There could be many reasons for this, such as the pursuit of higher penalties under alternative legislation, or to reduce the complexity of prosecuting and adjudicating the case in court; however, a joint, multi-agency investigation can help enable these types of strategic decisions to be made.

*A multi-disciplinary approach can offer up a range of alternative legislative options to explore all angles of the criminal scenario.*

### Advantages of wildlife crime laws and powers

**Wildlife crime laws** in some countries provide law enforcement powers that may not exist for other offences, which can provide certain advantages during investigations. For example, under the Wildlife Conservation Act 2010 in Malaysia, enforcement officers have the full powers of police investigation including arrest, search, and

seizure, with or without a warrant, and may enter any licensed wildlife premises at any time to conduct an inspection. The ability to act even without a warrant and to inspect premises at any time can be an advantage during investigations where a rapid response is crucial, such as those investigations involving live animals, and may be able to be leveraged by other agencies in relevant cases during joint investigations.

## The role of intelligence analysis

Although intelligence analysis is commonly used in response to other forms of serious and organised crime, it is virtually absent from the wildlife crime enforcement toolbox. Intelligence analysis is an incredibly important force multiplier where resources are low and the problem is vast, as it allows for in-

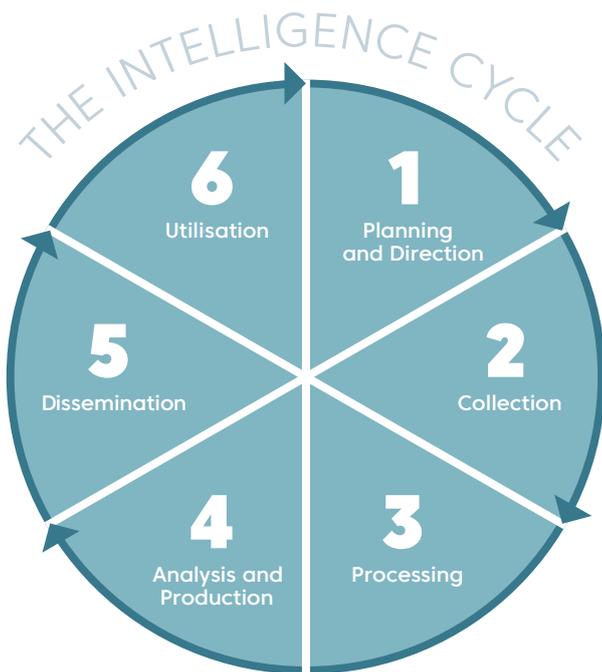
vestigations to remain focused on the greatest criminal threat. Therefore, intelligence must form part of any overarching strategy to tackle wildlife crime. Yet, the lack of both technical and human capacity is a major obstacle to the widespread use of intelligence analysis, and as a result, there are major gaps in the global intelligence picture of wildlife crime.

*Intelligence analysis is an incredibly important force multiplier where resources are low and the problem is vast, as it allows for investigations to remain focused on the greatest criminal threat.*



### Leveraging the full intelligence cycle

The **collection** of information is one of the early stages of the intelligence cycle. However, too much emphasis is placed upon this, and not enough on the analytical stages, which should aim to extract meaning from the information.



### Standardised data collection

**There is currently** an over-reliance on NGOs to collect wildlife crime data and information, with few governments holding their own comprehensive datasets. Unlike other illicit commodities (and most notably illicit drugs), there is no universal, standardised data collection for wildlife. This may be complicated by the fact that there is no agreed legal definition of wildlife crime and great variations from country to country on which wildlife species and products are protected by national law, and which acts involving protected species constitute a criminal offence. However, the lack of standardised data collection creates huge challenges when it comes to compiling and analysing data across a range of sources. Price data in particular is vital to provide a deeper understanding of the criminal dynamics behind the trade, and with a convergence lens it can provide a common unit to enable unlike species and commodities to be compared and monitored over time as an index. It also enables the calculation of revenues accruing to criminals, which is crucial for financial investigations.

### Identifying the highest threats

**Intelligence analysis** and organised crime group mapping are valuable tools to identify and manage the highest threat from organised crime. Particularly in the context of crime convergence, it is crucial that

law enforcement focus is on the criminal networks as a whole, rather than individuals, to determine where the greatest level of risk lies and prioritise resources in the most efficient way to address the problem from an organised crime point of view. Targeting criminal networks in this way can then lead to the potential disruption of multiple criminal activities simultaneously, rendering networks less efficient and having a greater overall impact on reducing crime.

### Applying analytical techniques to identify convergence

**Crime series** are defined as incidents that demonstrate at least one commonality in the method used to commit the crime. Such observed characteristics allow for the attribution of several crimes which may fit the series to one offender or a network of offenders. Applying analytical techniques such as *crime pattern analysis* to identify crime series will provide more insight as to how such crimes may be further linked. Another useful technique that can increase insights about organised crime driven by high-value commodities such as rhino horn or illicit drugs, is the examination of the *flow of commodities*. Tracing the flow of illicit drugs, ivory, shark fins, or other products in a trafficking network may allow for the identification of those involved in the importation and distribution of the commodity. A flow chart is a useful tool in a criminal business profile which can illustrate business and financial processes.



# Conclusion and recommendations

**Convergence between** wildlife crime and other forms of organised crime has long been recognised but the extent to which it is occurring has remained a matter of debate, due to the lack of data and empirical evidence. The result is that intelligence opportunities to fully understand the nature of the threat are being missed and resources are not being allocated appropriately in response to the problem.

**The case studies illustrated** in this report provide a range of examples of how crime convergence is occurring on the ground, with the aim of further developing the knowledge base around this issue. Crime convergence should be further studied and integrated as part of the approach to tackle wildlife crime and organised crime more broadly, as an improved understanding of this intersection can help to identify more strategic policy and law enforcement

responses to address it. The case studies also show that wildlife crime is a cross-cutting criminal activity which cannot be tackled in isolation from other crimes.

*Crime convergence should be further studied and integrated as part of the approach to tackle wildlife crime and organised crime more broadly.*

**Intelligence analysis** and a toolbox of analytical techniques such as organised crime group mapping, crime pattern analysis, flow of commodities, and more, can lead to greater insight of where and how wildlife crime may be converging with other crimes. However, intelligence needs to be shared for it to be of value in a law enforcement con-

text, but is currently not happening enough to enable authorities to understand the rate at which crime is intertwined and for further connections to be established. Crime is still often looked at in terms of individuals and specific commodities, particularly in the field of wildlife crime, where instead it should be assessed and dealt with in terms of the size of the threat posed by a particular organised crime group and the means and motivations of that group to commit crimes.

**Due to the “lower risk”** profile of wildlife crime, wildlife criminals are often less guarded and operationally savvy, which can present an easier entry point for law enforcement to infiltrate criminal networks that may be engaging in multiple forms of organised crime. Utilising such investigative opportunities that target and remove the common nodes between networks

could have a significant impact on disrupting and dismantling transnational organised crime groups across a range of crime types.

**There is also a lack** of financial and corruption investigations that run in parallel or in response to wildlife crime cases, despite clear and frequent convergence with these crimes. If a criminal group can send a shipment of wildlife products to a country with fake address and contact details and no legitimate means of identifying the recipients, then it stands to reason that they could also do the same for other commodities including illicit drugs and firearms. Such shipments clearly suggest corrupt collusion, but these investigations are not followed up. As income streams, criminal groups may see little difference between commodities, although it does not mean that such nexuses exist in every case.

**Identifying if convergence exists** can also be useful during the adjudication and sentencing of cases, to understand the full extent of crime and aggravating circumstances that are involved and ensure that appropriate penalties are applied commensurate with all aspects of the case.

**Based on the case studies** and analysis, the Wildlife Justice Commission suggests the following recommendations to assist law enforcement authorities and policy makers in strengthening their focus on wildlife crime convergence:

**i** **More consideration** should be given to intelligence collection and governments developing their own comprehensive wildlife datasets. Linked to this, it is also important that frameworks and protocols are developed to

facilitate the sharing of intelligence in a timely and secure manner – both inter-agency and cross-border. This would greatly contribute to improved global intelligence compilation, analysis, and sharing for wildlife crimes.

**ii** **Organised crime group** mapping should be an essential tool to identify how and where convergence may be occurring, and to tackle wildlife crime from the point of view of organised crime. Crime should be assessed in terms of the size of the threat posed by a particular organised crime group and the means and motivations of that group to commit crimes, and law enforcement resources allocated accordingly.

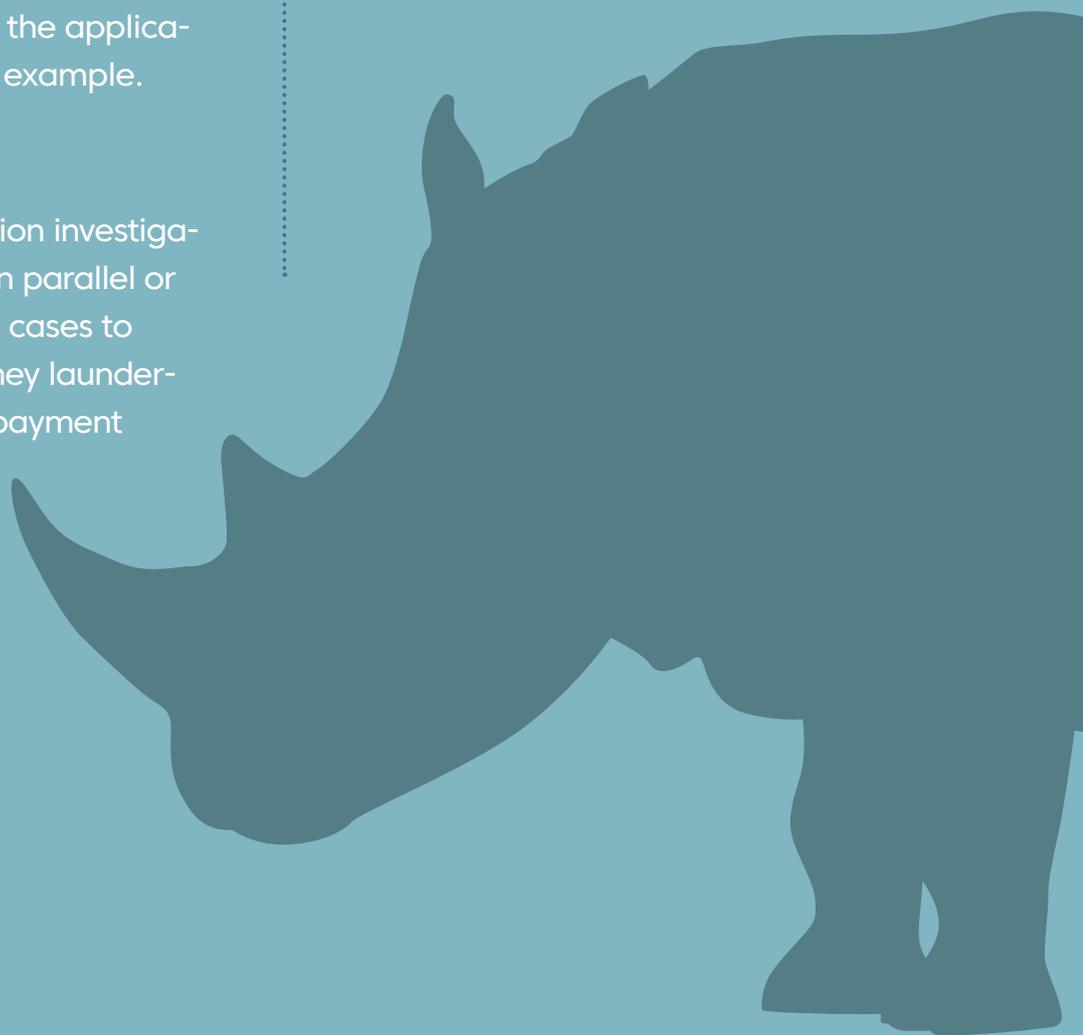
**iii** Multi-agency cooperation, joint investigations and task forces should be utilised where appropriate to bring the

necessary law enforcement expertise to target convergence and explore all angles of the criminal scenario.

**iv** Consideration should be given to using alternative legislation relating to the convergent or ancillary offences where relevant and appropriate. This approach may enable strategic decision making relating to the use of alternative law enforcement powers or the application of higher penalties, for example.

**v** Financial and corruption investigations should be conducted in parallel or in response to wildlife crime cases to identify any associated money laundering or corruption offences, payment methods, and to identify the proceeds of crime to facilitate asset recovery.

**vi** Greater utilisation of specialised investigative techniques such as communications interception, undercover operations, the use of listening and tracking devices, and controlled deliveries would enable investigators to gain a better understanding of where crime convergence may exist between wildlife crime and other serious crime types, and to develop a coordinated law enforcement response if such crimes are identified.



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