



DIRECTORATE-GENERAL FOR INTERNAL POLICIES

POLICY DEPARTMENT
ECONOMIC AND SCIENTIFIC POLICY **A**

Economic and Monetary Affairs

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**Environment, Public Health
and Food Safety**

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Internal Market and Consumer Protection

Wildlife Crime in the Netherlands

In-depth Analysis for the ENVI Committee



DIRECTORATE GENERAL FOR INTERNAL POLICIES
POLICY DEPARTMENT A: ECONOMIC AND SCIENTIFIC POLICY

Wildlife Crime in the Netherlands

IN-DEPTH ANALYSIS

Abstract

This analysis on wildlife crime was commissioned by Policy Department A at the request of the Committee on the Environment, Public Health and Food Safety. It gives an overview of the state of wildlife crime in the Netherlands based on available documents and empirical research including interviews. The study identifies main routes and species linked to illegal wildlife trade as well as Dutch efforts to combat wildlife crime.

This document was requested by the European Parliament's Committee on the Environment, Public Health and Food Safety.

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Manuscript completed in Mars 2016.

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This document is available on the Internet at:

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LIST OF ABBREVIATIONS

CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
IFAW	International Fund for Animal Welfare
NGO	Non-Governmental organisation
NVWA	Netherlands Food and Consumer Product Safety Authority
TCM	Traditional Chinese Medicine
WAP	World Animal Protection
WJC	Wildlife Justice Commission
WNF	Wereld Natuur Fonds
WODC	Research and Documentation Center (of the Dutch Ministry of Security and Justice)

EXECUTIVE SUMMARY

This study presents insights on wildlife crime and efforts to combat it in the Netherlands. It is based on publicly available documents, literature, and interviews with three experts. The analysis shows that the Netherlands is a major destination as well as transit hub for the trade in endangered animals and plants and products thereof in Western Europe. Between 2001 and 2010, 14 % of seizures in the EU took place in the Netherlands. A similar trend is noticeable in the period 2011-2015.

Trading routes in which the Netherlands is involved are very diverse and in the case of confiscations, countries of origin, export and destination are often unknown. However, it is evident that in 2013-2014, the majority of confiscations in the Netherlands were related to trading routes in which China, Hong Kong and Thailand either were countries of origin, export and/or destination.

In the Netherlands illegal shipments of wildlife mainly consist of live reptiles and birds, and products thereof, plants, and Traditional Chinese Medicine (TCM). In the past few years, the majority of confiscated wildlife items fell under Appendix II/Annex B instead of Appendix I/Annex A.

Dutch trafficking hotspots are the airport of Schiphol Amsterdam and the port of Rotterdam, with its massive container activity. Another important trading place is the internet, through websites such as www.markplaats.nl and www.christies.com. In addition, local markets and fairs for birds, reptiles and curiosa objects offer opportunities for illegal trade.

Combating wildlife crime is not a high priority in the Netherlands and there is no specific action plan to tackle illegal wildlife trade. However, compared to the other EU Member States, the Netherlands is seen as one of the frontrunners in enforcement of wildlife trade regulations, because of its risk-based approach and well-functioning cooperation between customs, police, and administration. It has an action plan for enforcement of CITES related regulations.

The strengths of the Dutch approach are related to the well-functioning cooperation between customs, national policy and the Netherlands Food and Consumer Product Safety Authority (NVWA) and their risk-based approach to control and enforcement. There is much expertise in the Netherlands that could be shared with other countries.

The Netherlands is involved in several cooperative activities with other countries. However, the varying levels of enforcement in the EU are considered a major barrier for effective cooperation.

Several international NGOs, such as the International Fund for Animal Welfare (IFAW), Wereld Natuur Fonds (WNF), and World Animal Protection (WAP) are active in the Netherlands to combat wildlife crime. In addition, the Wildlife Justice Commission (WJC) was launched in July 2015. It aims to hold perpetrators of wildlife crime accountable and to generate additional publicity.

Addressing the demand side of wildlife trade is considered a challenging task. The Ministry of Economic Affairs is undertaking efforts in the area of awareness-raising. Since February 2015, the Netherlands has a positive list of mammals that are legally allowed to be kept as pets. The intention exists to develop similar lists for reptiles and birds.

1. INTRODUCTION

This in-depth analysis presents insights on wildlife crime and efforts to combat it in the Netherlands. It was compiled as part of a larger project executed for the European Parliament titled a 'Study on Wildlife Crime' which provides insights into wildlife crime in the EU as well as efforts to combat it (Sina et al. 2016). The latter study also presents conclusions on how to enhance EU and Member State action on wildlife crime. The present in-depth analysis has informed the main study, but contains a more detailed description of the situation in the Netherlands than the main study. In addition to this in-depth analysis, similar analyses have been prepared on Germany, Poland, Spain and the UK.

The present analysis is based on desk-based research, a limited number of interviews with experts on the topic of wildlife crime as well as the analysis of available data on wildlife crime. Generally, it should be noted that data on wildlife crime (as on other forms of environmental crime) have significant gaps; the data that exist are not necessarily coherent across time or between countries.

The text is structured as follows: Section 2 provides evidence on wildlife crime in the Netherlands. Section 3 focuses on efforts addressing wildlife crime, including among others a description of relevant actors and the legislative framework. Section 4 presents the conclusions on wildlife crime in the Netherlands; recommendations can be found in the main study on wildlife crime.

2. WILDLIFE CRIME IN THE NETHERLANDS

KEY FINDINGS

- The Netherlands is a major destination as well as transit hub for the trade in endangered animals and plants, and products thereof.
- Compared with other EU Member States, the amount of CITES related seizures is relatively high.
- Illegal shipments of wildlife mainly relate to live reptiles and birds, and products thereof, plants, and Traditional Chinese Medicine (TCM).
- For the majority of confiscations, China, Hong Kong and Thailand either are countries of origin, export and/or destination.
- There are no indications that organized crime is heavily involved in wildlife crime in the Netherlands.

2.1. Trade routes and trends

The Netherlands is well-known as a major **destination as well as transit hub** for the trade in endangered animals and plants and products thereof (TRAFFIC 2015; Van Uhm 2012a and 2012b). Between 2001 and 2010, 14 % of seizures in the EU took place in the Netherlands (out of a total of 22 000 seizures in the EU)¹. A similar trend is noticeable in the period 2011-2015.

Compared with other Member States, the amount of **CITES related seizures** is relatively high. However, opinions vary about the interpretation of this data. Two experts interviewed argued that the Netherlands was indeed a major player and that those wildlife crimes resulting in seizures were in fact only the tip of the iceberg²; another expert expressed the view that the Dutch type of risk-based enforcement has proven to be effective, resulting in a relatively high amount of seizures³.

An explanation for the relatively **strong involvement of the Netherlands** in wildlife trade could be that it had in the past less strict legislation than neighbouring countries⁴. Consequently, it became an important hub of international wildlife trafficking and also well-known as such. After the relevant legislation was harmonised with that of other EU Member States, some of the major Dutch traders stayed involved in the wildlife business but started to operate from 'source' countries, such as Indonesia, Madagascar, and Panama. There are indications that these traders still use Dutch trade channels and contacts for their trade activities.

An expert meeting in 2011 concluded that approximately **250 professional traders and 640 private individuals** are involved in trading activities in the Netherlands, and that CITES-related crime in which the Netherlands plays a role shows a considerable variation (Neve et al. 2012).

¹ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015.

² Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

³ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority, Ministry of Economic Affairs, 4 November 2015.

⁴ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015.

Current Dutch trafficking hotspots are the **airport of Schiphol Amsterdam** and the **port of Rotterdam** due to its massive container activity⁵. Significantly fewer seizures are reported from the port of Amsterdam.

In the Netherlands illegal shipments of wildlife mainly relate to **live reptiles and birds, and products thereof, plants, and Traditional Chinese Medicine (TCM)**⁶. In the past few years, the majority of confiscated wildlife fell under Appendix II/Annex B instead of Appendix I/Annex A. Legal wildlife related exports mainly relate to captive-bred CITES species, such as orchids, cactuses, birds and reptiles⁷.

Considerable amounts of legal and illegal wildlife and wildlife products are offered for sale at the **websites** of www.markplaats.nl and, for art objects, www.christies.com. In addition, **local markets and fairs** are popular places for the trade in live birds, reptiles and curiosa objects. These markets and fairs are well-known internationally and attract many foreign buyers and traders. Most of the trading is legal but the interviewees suggested that illegal trade takes place at the fringes of these gatherings⁸.

2.2. Seizures/confiscations

Trading routes in which the Netherlands is involved are very diverse; in cases of confiscations countries of origin, export and destination are often unknown⁹. However, it is evident that in 2013-2014, for the majority of confiscations **China, Hong Kong and Thailand** were either countries of origin, export and/or destination.

In 2013, significant confiscations were also carried out of specimens coming from **Central and South America**¹⁰. This was less the case in 2014. African countries are only involved as countries of origin and export but not as destination.

In 2013 and 2014, the total amount of seizures/confiscations in the Netherlands amounted to 1,634, of which 218 were classified as significant¹¹. The **breakdown across different types of wildlife** was as follows: 40 % Traditional Chinese Medicine, 25 % birds, 15 % plants, 10 % reptiles, and 10 % mammals.

Table 1: Significant seizures/confiscations in the Netherlands

Type of seizure/confiscation	Number of seizures
<i>Live specimens</i>	
Animals	26
Plants	22

⁵ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

⁶ CITES Netherlands Biennial Report 2013-2014.

⁷ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority, Ministry of Economic Affairs, 4 November 2015.

⁸ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015, interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority, Ministry of Economic Affairs, 4 November 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

⁹ CITES Netherlands Biennial Report 2013-2014, Annex C3.

¹⁰ CITES Netherlands Biennial Report 2013-2014, Annex C3.

¹¹ CITES Netherlands Biennial Report 2013-2014, p. 5.

Corals	3
<i>Non-living specimens</i>	
Animal products	34
Leather products	20
Medicines	13
Wood and products containing wood	12
Animals	5
Ivory	4
Corals	2
Cosmetics	1

Source: CITES Netherlands Biennial Report 2013-2014.

TRAFFIC annually reports about international seizures at EU borders. It considers the Netherlands as one of the countries with a relatively high number of seizures at the EU's external borders (TRAFFIC 2015).

In 2015, the Netherlands was one of the participants in **COBRA III**, a major international enforcement operation coordinated by Europol and Interpol. The operation led to multiple seizures in the Netherlands, including 43 ivory objects and 16 whale ribs¹². The Dutch national Nicolaas Duindam is on Interpol's Infra Terra list of most wanted suspects of wildlife crime.

2.3. Trade in specific species

Researchers have reported about specific forms of illegal trade in protected species. Van Uhm (2016 and 2014a) reported that in the past years many dead animal specimens and products thereof were confiscated in Europe that are used as ingredients in **Traditional Chinese Medicine (TCM)**. The majority of confiscated TCM items were exported by Chinese business men from China, with the Netherlands, Denmark and Germany as destinations. In most cases, these products were imported without any official CITES documents. Most traded TCM items came from the cities of Guangzhou, Hongkong and Beijing, and travelled to Europe over land, sea and by air.

The market for TCM ingredients is not only growing in China but also worldwide, including in Western Europe (Van Uhm 2014a). Demand for **rhino horn** has increased significantly, specifically for use in TCM products, and tiger bones, antelope horn, bear bile, pangolin scales and seahorses are also in high demand. Reijngoud (2009) investigated the availability of **bear bile** products in the Dutch market and found that trade mainly takes place through the internet.

¹² Press Release NVWA, 18 June 2015.

Neve et al (2012) reported that within the market for **reptiles**, the Netherlands, Germany and Belgium are linked to a considerable extent. Specifically, the airport of Schiphol Amsterdam is getting a more prominent role as point of entry. Once imported, many reptiles are traded via the internet or local markets and fairs.

According to Siegel and Van Uhm (2014), 22 shipments of **caviar** were intercepted in the Netherlands between 2006 and 2013 (Siegel and van Uhm 2014). These shipments amounted to more than 30 kilograms in total, with a value of several thousands of Euros per kilogram. Dutch shop and restaurant owners confirmed that illegal black caviar is regularly offered for sale. Methods used in illegal trading consist of falsifying documents and labels, and selling wild caviar as cultivated caviar. But due to its high price, cultivated caviar is also increasingly sold as wild caviar. Maximum amounts of 125 grams of caviar are allowed to be traded freely in the Netherlands.

Van Uhm (2016 and 2014b) also investigated the illegal trade in **Barbary macaques**, which are the most commonly seized protected mammal at the European borders. The latter study was commissioned by the Dutch NGO Foundation AAP (Stichting AAP). Most of these macaques are destined to be kept as pets. In addition to an analysis of trade figures, Van Uhm interviewed monkey hunters and traders in Morocco and sent out questionnaires to European rescue centres for Barbary macaques. One of the major outcomes of this study is that organized traders in Morocco perform more important roles in the smuggling process than assumed previously. The illegal trade is driven by high profit margins. While the hunters are paid EUR 50-100 for a Barbary macaque, the consumer in Europe will pay EUR 2,000 for the same animal.

2.4. Organized crime

According to two experts interviewed, there are no indications that organized crime is heavily involved in wildlife crime in the Netherlands¹³. However, this does not mean that there is not a certain level of organization between the people engaged in illegal wildlife trade¹⁴.

Van Uhm (2012b) interviewed staff from the **Dutch Crime Squad** about the involvement of organized crime groups in wildlife trade. They reported that crime networks smuggling animals, such as birds or reptiles to the Netherlands use a *modus operandi* similar to drug traffickers. A common method is to hide the animals or products in concealed compartments in luggage or on the smuggler's body. Furthermore, it appeared that criminal groups immediately filled the gap when legal imports of protected birds were banned due to avian influenza. Couriers repeatedly smuggled birds from Surinam through Spain into the Netherlands.

In China, organized crime organisations such as the Wo Shing Wo and 14K **triads**, are involved in wildlife crime, especially in relation to rhino horn and ivory (Van Uhm 2014a). It is not evident whether the Chinese triads active in the Netherlands are also engaged in smuggling of illegal TCM products or ivory.

¹³ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority (Ministry of Economic Affairs, Netherlands Enterprise Agency), 4 November 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

¹⁴ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015.

3. EFFORTS TO COMBAT WILDLIFE CRIME IN THE NETHERLANDS

KEY FINDINGS

- Combating wildlife crime is not a high priority in the Netherlands at the political level. However, compared to other EU Member States, the Netherlands is seen as one of the frontrunners in enforcement of wildlife trade regulations.
- It is common practice in the Netherlands that administrative measures for confiscated live specimens include the passing of all associated costs to the offender.

3.1. Legislative framework and authorities

The main responsibility for the implementation of the legislation on the trade in endangered animal and plant species lies with the **Ministry of Economic Affairs** and its Department for Nature and Biodiversity¹⁵. Specific authorities responsible for combating wildlife crime in the Netherlands are the following:

- Department for Nature and Biodiversity of the Ministry of Economic Affairs
- Legal office of the Ministry of Economic Affairs
- Food and Consumer Product Safety Authority of the Ministry of Economic Affairs
- CITES Management Authority, located at the Ministry of Economic Affairs
- CITES Scientific Authority, independent but with a secretariat provided by the Ministry of Economic Affairs
- Customs Service of the Ministry of Finance
- Platform on Environmental Crime (DNR) of the National Police Agency
- Office of the Public Prosecutor of the Ministry of Security and Justice
- Administrative Law Enforcement of the Netherlands Enterprise Agency
- Team IBG (Seizure of CITES-goods) of the Netherlands Enterprise Agency

The current **legislative framework** consists of the Flora and Fauna Act (Flora en Faunawet, Stb. 1998, 402) and a series of implementing regulations. A new Act on nature protection has been adopted in December 2015 (Wet natuurbescherming, Stb. 2016, 34); it will enter into force on 1 January 2017.

There are **stricter domestic measures** than EU law requires for the trading and possession of Appendix I /Annex A specimens (e.g. primates, large felidae, hawks, rhino horns and tiger bones)¹⁶. According to national law, the Ministry of Economic Affairs is obliged to maintain a **register for Annex A specimens** of all sources¹⁷. This rule also applies to birds of Annex B without a seamless closed foot ring. Birds mentioned in Annex A need to be marked in line with the national legislation on foot rings. Other vertebrates contained in Annex A need to be marked in line with EU legislation.

¹⁵ CITES Netherlands Biennial Report 2013-2014, p. 3.

¹⁶ CITES Netherlands Biennial Report 2013-2014, p. 3.

¹⁷ CITES Netherlands Biennial Report 2013-2014, p. 3.

The **effectiveness of the national legislation** has been assessed as adequate¹⁸. However, the CITES Netherlands Biennial Report 2013-2014 does not give details about this assessment nor does it indicate to which point in time it refers. The Dutch government has not planned any review or assessment for the new reporting period.

Combating wildlife crime is **not a high priority** in the Netherlands at the political level¹⁹. The Netherlands has no specific action plan to tackle illegal wildlife trade in place. However, compared to the other EU member states, the Netherlands is seen as one of the frontrunners in enforcement of wildlife trade regulations²⁰. It has an action plan for enforcement of CITES related regulations.

The Dutch political **Party for the Animals** (Partij voor de Dieren) recently called for an import ban on hunting trophies, along similar lines as those already in force in Australia (for lion parts and products) and the United States (for elephant parts and products), which was endorsed in a parliamentary resolution²¹. An important argument for such a ban is that the current import exemptions for hunting trophies may have the side-effect of facilitating illegal trade of the species concerned by providing an easy cover-up.

From 1-3 March 2016, the Dutch Ministry of Economic Affairs (2016) will host a global conference **'Save Wildlife: Act Now or Game Over'** in The Hague, together with its partners, The Hague Institute for Global Justice and The Prince of Wales's International Sustainability Unit, in close cooperation with the European Commission. The conference will build on the London and Kasane Conferences on illegal wildlife trade, and set the stage for the Hanoi Conference, due to take place later in 2016. It will place particular emphasis on striking multi-stakeholder **'wildlife deals'** in the areas of tourism, anti-corruption, technology, transportation, finance, and demand reduction.

3.2. Enforcement and other measures to combat wildlife crime

3.2.1. Administrative measures

The **Dutch Management Authority for CITES** is located at the Ministry of Economic Affairs, Department of Nature and Biodiversity²². Its staff consists of one person in the policy section (100 % of time spent on CITES), and twelve persons at the permit and administrative law enforcement section who each spend 80 % of their time on CITES related activities²³. The lead agency for enforcement is located at the **Netherlands Food and Consumer Product Safety Authority (NVWA)**. Its staff works only partially on CITES related matters (0.03 %) and has been recently reduced from 350 to 150 persons. Staff from the NVWA periodically gets together with officers from other enforcement agencies, such as customs, national policy and the public prosecutor's office. The frequency of meetings amounts to 6 times per year²⁴.

It is common practice in the Netherlands that **administrative measures** for confiscated live specimens include the passing of all associated costs to the offender. In a recent case

¹⁸ CITES Netherlands Biennial Report 2013-2014, p. 4.

¹⁹ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015, interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority, Ministry of Economic Affairs, 4 November 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

²⁰ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority, Ministry of Economic Affairs, 4 November 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

²¹ Parliamentary resolution proposed by parliamentarians Thieme and Heerema and endorsed by majority voting, 25 June 2015.

²² CITES Netherlands Biennial Report 2013-2014, p. 6.

²³ CITES Netherlands Biennial Report 2013-2014, p. 6-7.

²⁴ CITES Netherlands Biennial Report 2013-2014, p. 14.

the costs for keeping alive a large party of live spectacled caimans amounted to ten thousands of Euros²⁵. Living plants are donated to botanical gardens and animals and corals to zoos. For non-living specimens, no costs are passed on to the offenders. Dead specimens are destroyed.

In 2013 and 2014, enforcement authorities wrote 60 letters to offenders to explain the CITES regulations and gave out 113 official warnings to offenders²⁶. In the previous period of 2011 and 2012, these letters and official warnings amounted to 115 and 121, respectively²⁷.

3.2.2. Criminal prosecution

Under Dutch criminal law, the maximum penalties in the case of a wildlife crime vary and can include **imprisonment for a maximum of 6 years**, community service or a fine of EUR 81 000 for individuals and EUR 810 000 for corporations²⁸. In case of an offence, which is a lighter form of a criminal act than a crime, the maximum penalties are detention for a maximum of 1 year, community service or a fine of EUR 20 250 for individuals and EUR 202 500 for corporations. In addition, Dutch criminal law allows for the following sanctions: closing down a business for a certain period of time; publishing court decisions in certain magazines/newspapers; and prohibiting a convicted offender from trade in live animals or keeping live animals as pets.

The CITES Netherlands Biennial Report 2013-2014 confirms that there have been criminal prosecutions of significant CITES-related violations in the Netherlands and also court actions but does not specify the type of criminal acts and ensuing sanctions.

In 2014 and 2015, the national police and the NVWA started several criminal investigations²⁹. However, they were not always given follow-up by public prosecutors, although there are several examples of court cases and convictions. Recently, a bird trader was convicted and received **a sentence of 15 months in prison** because of large-scale trading and membership in a criminal organization³⁰.

3.2.3. Crime investigations

Every four years, the Research and Documentation Centre (WODC) of the Dutch Ministry of Security and Justice publishes the so-called **Organized Crime Monitor** that analyses the nature of organized crime in the Netherlands. The last version is from 2012 (see Kruisbergen et al. 2012). In recent years, money laundering has received increased attention from the research department of the WODC but not in relation to wildlife crime (see e.g. Kruisbergen et al. 2015).

Overall, wildlife crime has thus far not been an explicit topic in the research activities of the WODC. Similarly, the national office of the public prosecutor and the police do not consider wildlife crime a priority area in their investigations (Openbaar Ministerie en Politie 2015). The regional and national information and expertise centres of the ministry of Security and Justice have not included wildlife crime as one of their priorities either (RIEC-LIEC 2015).

²⁵ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority (Ministry of Economic Affairs, Netherlands Enterprise Agency), 4 November 2015.

²⁶ CITES Netherlands Biennial Report 2013-2014, Annex C3.

²⁷ CITES Netherlands Biennial Report 2011-2012, Annex C3.

²⁸ CITES Netherlands Biennial Report 2013-2014, p. 21.

²⁹ Interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

³⁰ Veroordelingen voor grootschalige illegale dierenhandel, rechtspraak.nl, 11 June 2015.

According to its **Security Agenda 2015-2018** (*Veiligheidsagenda 2015-2018*), current priorities of the Ministry of Security and Justice include child pornography, high impact crime, and cybercrime.

Every four years, the government publishes the **National Threat Assessment** (*Nationaal Dreigingsbeeld*) which analyses trends in organized crime. The Threat Assessment consists of a main report and several underlying studies. It forms the basis for priority setting by the government in dealing with organized crime. The next Threat Assessment is planned for 2017.

The last Threat Assessment was published in 2012 (Boerman et al. 2012). Its main report does not mention any CITES-related crime at all. However, one of the underlying reports focuses on environmental crime and dedicates 12 out of its 167 pages to illegal trade in endangered plant and animal species (Neve et al. 2012).

The Dutch National Police also does **empirical research** about organized crime and officers involved in enforcement activities regularly report about their **tactical operational analyses** (Dutch National Police, 2015). However, these reports are not publicly available. In its crime statistics, the Dutch police do not have a separate category for CITES-related crime.

3.2.4. NGOs combating wildlife crime

Several international NGOs, such as the **International Fund for Animal Welfare (IFAW)**, **Wereld Natuur Fonds (WNF)**, and **World Animal Protection (WAP)**, are active in the Netherlands on combating wildlife crime. In addition, the environmental consultancy **Ecojust** provides expert advice and legal support in relation to enforcement and prosecution of wildlife crime³¹. It also disseminates online information on wildlife crime worldwide and participates in **Wildleaks.org**, an online platform for wildlife crime whistleblowers. Ecojust is also one of the partners in the **Wildlife Justice Commission (WJC)** initiative that was launched in The Hague on 13 July 2015, in response to the rise in wildlife crime experienced in recent years. The WJC aims to contribute to holding perpetrators of wildlife crime accountable, and to generate more publicity. It is currently gathering information on organized crime involving ivory and rhino horn trafficking from Africa to Asia and will soon start a court case in two different countries. In October 2015, the Dutch Ministry of Economic Affairs pledged to support the WJC financially³².

The focus of **Foundation AAP** (*Stichting AAP*) is on improving the welfare of exotic, non-domesticated animals that are illegally traded, kept as pets or abused in tourism, entertainment and biomedical research³³. AAP offers temporary shelter in its facilities in the Netherlands and Spain. In addition to its rescue activities, AAP advocates the development of stricter policies and legislation and better enforcement of existing legislation. It organizes publicity campaigns against keeping exotic animals as pets by stressing that these animals should not be taken out of their natural habitats. AAP is a member of EARS, the European Alliance of Rescue Centres and Sanctuaries, which is based in the Netherlands. Occasionally, Foundation AAP commissions research on specific wildlife trade related issues.

In addition, there are several news services dedicated to informing the wider public about wildlife and nature issues. One of them is **PiepVandaag.nl**, a Dutch online community that focuses on nature protection and environmental issues, including wildlife crime. The

³¹ Ecojust, <http://www.ecojust.eu>.

³² Roy Lie a Tjam. "Combatting transnational wildlife crime through collaboration", Diplomat Magazine, 11 October 2015.

³³ AAP, <http://www.aap.nl>.

website and Facebook account provide news and opinions in the Dutch language on a daily basis. Wildlife crime is one of its main topics.

De **Koninklijke Nederlandse Vereniging voor Natuurtoezicht** is a community of professionals active in nature protection. It publishes a newsletter on a daily basis, with a strong focus on compliance and enforcement issues. **Nature Today** provides a similar news service. The **NVWA** also publishes news about wildlife crime.

3.2.5. Wildlife crime in the media

Dutch national and regional newspapers and weekly magazines report on a regular basis about wildlife issues. This takes the form of news items when major seizures or court cases take place and also stories and interviews discussing wildlife issues in a broader context. The daily newspaper 'Het Parool' recently published an interview with Pauline Verheij from the Wildlife Justice Commission about the **international court case** she is helping to prepare against a criminal network involved in ivory and rhino horn trading in South-East Asia³⁴. In the article she explains the novel ways in which the Commission aims to operate to fight wildlife crime. Furthermore, the recent killing of Cecil the lion³⁵ in Zimbabwe got extensive media coverage with major articles about trophy hunting in Dutch newspapers and weekly magazines³⁶. An older example is the article about the pros and cons of ivory destruction in the newspaper Trouw in 2014³⁷.

3.2.6. Demand management

The experts interviewed considered addressing the demand side of wildlife trade a challenging task for several reasons³⁸. First, due to increased prosperity in several parts of the world, the demand for exotic pets and wildlife products including TCM is expected to increase at an enormous scale. Second, private keeping of reptiles and birds is accepted by major parts of the Dutch population. Lovers of wild animals who keep them as pets and/or breed them are often convinced that their hobby is born out of a deeply felt love for nature. Many of them play down the serious side-effects and argue that they positively contribute to species conservation. Third, as species become more threatened and more difficult to source they often become more desirable and expensive, thereby fuelling the incentive for illegal trade. Fourth, breeders of animal and plant species are always searching for fresh breeding material to reduce the risk of inbreeding. Fifth, the wider public may not be aware that importing certain plant and animal species is in contravention with the law regulating endangered and/or threatened flora and fauna.

In order to reduce demand for wildlife, the **Dutch CITES Bureau** informs those who apply for CITES permits and certificates about what is allowed and what is not. The Bureau also disseminates a newsletter. Other activities aimed at demand reduction include the provision of information and education at markets and fairs, including the Holiday Fair (*Vakantiebeurs*) which promotes touristic destinations to consumers, the World Port Days (*Wereldhavendagen Rotterdam*), and birds and reptile markets.

³⁴ Patrick Meershoek, Jacht op ivoorhandel geleid vanuit Nederland. In Het Parool, 24 October 2015.

³⁵ Cecil was an iconic African lion who was recognised by many visitors to the Hwange national park in Zimbabwe due to his distinctive black mane. In July 2015, he was killed by an US dentist who paid 50 000 dollars to a professional hunter and a landowner for the trophy hunt on Cecil.

³⁶ E.g. Rutger van der Hoeven, Nous sommes Cecil, De Groene Amsterdammer, 6 August 2015.

³⁷ Stephanie Engel, Maakt een taboe op ivoor in huiskamer of museum echt kans?. In Trouw, 20 February 2014.

³⁸ Interview with Daan van Uhm, wildlife crime researcher at Utrecht University, 28 October 2015; interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority (Ministry of Economic Affairs, Netherlands Enterprise Agency), 4 November 2015; and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

In February 2015, the Netherlands published a list of mammals that are legally allowed to be kept as pets. The intention exists to develop similar lists for reptiles and birds.

3.3. Cooperation with other Member States

The Netherlands is involved in several cooperative activities with other countries, such as exchange of information with other countries to determine the legal origin of specimens, requests for and providing investigative assistance, exchange of intelligence, cooperative enforcement activities, and international criminal investigations on the smuggling of animals from all over the world³⁹.

Structural cooperation takes places under the umbrella of the **EU Wildlife Enforcement Working Group** for which the Netherlands is one of the leading countries in the working group alongside Belgium, Germany and the UK⁴⁰.

The **varying levels of enforcement** in the EU are considered one of the major problems between the Member States⁴¹. Much illegal wildlife enters the EU through countries at the Southern and Eastern borders. At these borders, transport of wildlife and wildlife products may be easily laundered, for example by importing species caught in the wild as captive bred. In some countries, CITES certificates are easily granted, especially when custom officials are paid a small bribe.

³⁹ CITES Netherlands Biennial Report 2013-2014, p. 5.

⁴⁰ Interview with Bart Langeveld, responsible for CITES confiscations, Dutch CITES Management Authority (Ministry of Economic Affairs, Netherlands Enterprise Agency), 4 November 2015, and interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

⁴¹ Interview with Jaap Reijngoud, independent consultant specialized in wildlife crime enforcement, 9 November 2015.

4. CONCLUSIONS

The Netherlands is a major destination as well as transit hub for the trade in endangered animals and plants and products thereof in Western Europe. CITES-related crime shows a considerable variation in terms of trade routes and species concerned. There are signals that legal and illegal trade are interwoven.

Compared with other Member States, the Netherlands has a relatively high number of seizures at EU borders. It is unclear whether this is due to a stronger involvement in wildlife crime or to a more effective enforcement. Trafficking hotspots are the airport of Schiphol Amsterdam and the sea port of Rotterdam. Other venues for illegal trade are offered by websites and local markets and fairs.

Demand management is considered a challenging task as awareness about the illegality of trade in endangered species is low and private keeping of wildlife species is accepted by major parts of the Dutch population.

There is a certain level of organization between the people engaged in illegal wildlife trade in the Netherlands but there are no indications that Dutch organized crime is heavily involved.

Dutch enforcement of wildlife trade regulations is risk-based and takes advantage of a well-functioning cooperation between customs, national police and the Netherlands Food and Consumer Product Safety Authority (NVWA). Dutch enforcement officials consider the varying levels of enforcement in the EU Member States a major problem, seriously hampering effective enforcement of wildlife trade regulations.

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ANNEX I: LIST OF INTERVIEWS CONDUCTED

For the present analysis, the following interviews were conducted:

- Bart Langeveld, responsible for confiscated animals, plants and products, CITES Management Authority (Ministry of Economic Affairs, Rijksdienst voor Ondernemend Nederland), 4 November 2015
- Jaap Reijngoud, wildlife crime enforcement specialist, independent consultant for TRAFFIC, environmental NGO's and public authorities, 9 November 2015
- Daan van Uhm, academic researcher specialised in wildlife crime, Department of Criminology, Law Faculty, Utrecht University, 28 October 2015

ANNEX II: MAJOR SEIZURES REPORTED BY TRAFFIC

2014 (TRAFFIC 2015):

- 550 bottles containing derivatives/extract of Costus Root (*Saussurea costus*) (App. I/Annex A), detected following random controls at a river port, en route from Hong Kong to the Netherlands.
- 163 live spectacled Caimans (*Caiman crocodilus*) (App. I/II, Annex A/B), detected in air freight following a documentary check by customs, en route from Guyana to the Netherlands.

2013 (TRAFFIC 2014):

- 200 kg Hoodia (*Hoodia* spp.) (App. II/Annex B) powder, seized at airport, en route from China to the Netherlands.
- Large seizure involving various plant and animal-derived medicinal items, seized at port, en route from China to the Netherlands.
- 1 675 kg of Candelilla wax (*Euphorbia antisiphilitica*) (App. II/Annex B), seized at company premises while in transit in the Netherlands, exported from USA and intended to be shipped to Thailand for processing into lip balm.
- 379 reptile leather products seized including items made from skins of python (*Python* spp.) (App. I/II, Annex A/B) and monitor lizard (*Varanus* spp.) (App. II/Annex B), seized at airport, en route from Indonesia to the Netherlands.
- 600 live Red-eyed Leaf Frogs (*Agalychnis callidryas*) (App. II/Annex B), seized at airport, en route from Nicaragua to the Netherlands.

2012 (TRAFFIC, 2013):

- Various shipments of dried seahorses Hippocampus spp. (App. II/Annex B), seized while in transit in the Netherlands, en route from Central and South America - Ecuador, Panama, Peru to China.
- 276 480 tablets (57.6 kg) containing Costus Root (*Saussurea costus*) (App. I/Annex A), seized at random control in maritime port while in transit in the Netherlands, en route from Hong Kong to the UK.
- 540 000 tablets (630 kg) containing pangolin (*Manis* spp.) (App. II/Annex B), seized during random control at airport while in transit in the Netherlands, en route from China to Ghana.
- 50 tusks of African Elephant ivory (*Loxodonta Africana*) (App. I/II, Annex A/B), detected in air freight while in transit in the Netherlands, en route from Nigeria to Thailand.
- 680 kg of stony coral (*Scleractinia* spp.) (App. II/Annex B), en route from Indonesia to the Netherlands.
- 22 300 Red Sandalwood (*Pterocarpus santalinus*) (App. II/Annex B) timber chips, seized following random control at airport, en route from Nepal to the Netherlands.

2011 (TRAFFIC 2012):

- 309 dead seahorses (*Hippocampus* spp.) (App. II/Annex B), seized at airport while in transit in the Netherlands, en route from Peru to China.
- 2 994 dead seahorses (*Hippocampus* spp.) (App. II/Annex B), seized at airport while in transit in the Netherlands, en route from Peru to China.
- 170 large leather products made of Reticulated Python (*Python reticulatus*) (App. II/Annex B), detected in air freight shipment, en route from Indonesia to the Netherlands.
- 740 kg of stony coral (*Scleractinia* spp.) (App. II/Annex B), seized at airport, en route from Indonesia to the Netherlands.
- 762 kg of stony coral (*Scleractinia* spp.) (App. II/Annex B), seized at airport, en route from Indonesia to the Netherlands.
- 12 000 live cacti (*Cactaceae* spp.) (App. I/II, Annex A/B), seized at maritime port, en route from China to the Netherlands.
- 6 820 Hedge Cacti (*Cereus hildmannianuscacti*) (App. II/Annex B), seized at maritime port, en route from China, with destination the Netherlands.
- 160 orchids (*Orchidaceae* spp.) (App. I/II, Annex A/B), seized at airport while in transit in the Netherlands, en route from Thailand, with destination Russia.

NOTES

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ISBN 978-92-823-8997-3 (paper)
ISBN 978-92-823-8996-6 (pdf)

doi:10.2861/484448 (paper)
doi:10.2861/574976 (pdf)

