

Conference Report

Mainstreaming Financial Investigations in Illegal Wildlife Trade Cases

Lessons from Nigeria

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In September 2023, researchers from RUSI's Organised Crime and Policing research group led the design and implementation of a multi-agency training workshop on the financial investigation of illegal wildlife trade cases in Nigeria. This workshop was planned and delivered with the help of RUSI's technical lead on financial investigation training in Nigeria, Neil Bennett, civil society partners the Environmental Investigation Agency and Africa Nature Investors, and the Nigerian Financial Intelligence Unit. The authors are indebted to these partners, all of whom were integral to the success of the workshop.

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Introduction

In recent years, Nigeria has been recognised as the primary transit hub for the trafficking of large-scale flows of illegal wildlife trade (IWT) products from Africa to Asia.¹ In line with recommendations in previous RUSI research on combatting the involvement of organised crime groups (OCGs) and associated illicit financial flows in IWT,² Nigeria has taken positive steps in tackling these issues. They include recognition of IWT as a money-laundering risk, prioritisation of financial intelligence resources for parallel investigation of IWT, and the strengthening of national policy frameworks to combat the financial enablers of wildlife crime.

Despite such progress, these strategies have yet to produce successful enforcement outcomes, with no examples of IWT-related money-laundering prosecutions being sanctioned to date. The Nigerian Financial Intelligence Unit (NFIU) has therefore identified the need for capacity building in financial investigation and prosecution of IWT cases. Against this backdrop, and in collaboration with the NFIU and key civil society partners, in September 2023 RUSI delivered a training workshop in Abuja on the financial investigation of IWT for Nigerian public sector agencies.

The aim of the workshop was to enhance the institutional capabilities of the Nigerian authorities to combat IWT-related financial flows and OCGs, while identifying existing challenges and opportunities for effective cooperation and collaboration in financial investigations and prosecutions of IWT. The workshop was followed by four bilateral meetings with members of the regulated financial sector to further explore the themes raised in the workshop, including the role of the private sector regarding the detection and investigation of IWT-related illicit financial flows. The purpose of this report is to summarise the lessons learned from these activities, including the workshop, pre- and post-workshop questionnaires and the bilateral meetings. None of the discussions in the workshops are attributable and details pertaining to any ongoing cases have been withheld from this report to avoid jeopardising judicial outcomes.

The report is structured in four sections. The first provides further background to the workshop, detailing participating organisations and learning objectives. The second outlines stakeholder perceptions of Nigeria's role in IWT at the national

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1. Environmental Investigation Agency (EIA), 'Combating Wildlife Crime in Nigeria: An Analysis of the Criminal Justice Legislative Framework', August 2021, p. 10; Government of Nigeria, 'National Strategy to Combat Wildlife and Forest Crime in Nigeria 2022–2026', p. 6; Interpol and ENACT, 'Illicit Goods Trafficking Via Port and Airport Facilities in Africa', June 2020, p. 13; United Nations Office on Drugs and Crime (UNODC), 'World Wildlife Crime Report 2020', 2020, p. 19.
 2. Alexandria Reid and Mark Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa', *RUSI Occasional Papers* (April 2021).

and international levels. The third discusses opportunities identified for improving financial investigations into wildlife crime. The fourth maps specific opportunities around the role of the private sector. The report concludes with a short summary of the key themes that emerged during discussions, including: how pervasive corruption undermines efforts to counter IWT; capacity gaps around financial intelligence in IWT cases; the need for greater inter-agency collaboration and coordination; the opportunity to engage the private sector – hitherto an under-utilised resource in the fight against IWT in Nigeria – in efforts to ‘follow the money’; and the importance of raising mainstream awareness of IWT.

Overview

Amid growing international consensus around the need to ‘follow the money’ in wildlife investigations, Nigeria has taken significant steps in prioritising resources and strengthening key policy frameworks on IWT-related illicit finance. In 2020, the NFIU established its Natural Environment and Wildlife Trade Crimes Analysis Unit (NEWTCU), the first of its kind in the region. The NEWTCU is tasked with collaborating with relevant enforcement actors to provide tactical and operational intelligence on IWT cases. Recently, steps have been taken to strengthen key policy frameworks to support ‘following the money’ in IWT, with wildlife crime being recognised in the 2022 National Inherent Risk Assessment (NIRA) of Money Laundering in Nigeria as an inherent risk for illicit finance;³ and the 2022–26 National Strategy to Combat Wildlife and Forest Crime (NSCWFC) including the removal of financial enablers of IWT crime as a strategic objective.⁴ Subsequently, authorities have begun to conduct parallel financial investigations of IWT cases.⁵ These policy reforms are in line with RUSI’s recommendations from research conducted on IWT and illicit financial flows in West Africa in 2021.⁶

However, there have been no sanctioned cases of IWT-related money-laundering. Accordingly, the NEWTCU has identified the need for capacity building in this area to ensure that investigations and prosecutions are conducted in line with national money-laundering risks.

As part of RUSI’s long-running programme supporting key IWT source and transit jurisdictions in strengthening understanding of and capacity in financial

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3. National (Money Laundering and Terrorist Financing) Risk Assessment Forum (NRA Forum), ‘National Inherent Risk Assessment of Money Laundering in Nigeria’, 2022; see also Government of Nigeria, ‘National Strategy to Combat Wildlife and Forest Crime in Nigeria 2022–2026’.
 4. Government of Nigeria, ‘National Strategy to Combat Wildlife and Forest Crime in Nigeria 2022–2026’, p. 10.
 5. NRA Forum, ‘National Inherent Risk Assessment of Money Laundering in Nigeria’.
 6. Reid and Williams, ‘Illegal Wildlife Trade and Financial Investigations in West Africa’.

investigation of IWT cases, the 2022–25 project ‘Combatting the Illegal Wildlife Trade in West and Central Africa’⁷ included plans for public sector capacity-building activities in Nigeria, including the RUSI-led training workshop that was held in Abuja in September 2023. All activities under this project were funded under the ‘Partnership against Wildlife Crime in Africa and Asia’ programme, implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit on behalf of the German Federal Ministry for Economic Cooperation and Development.⁸

The September 2023 workshop also ensured synergies with other capacity-building activities in Nigeria, strategically aligning with a multi-phase training programme on financial investigation of IWT cases developed by the Environmental Investigation Agency (EIA) and Africa Nature Investors (ANI). Key personnel from these non-profits were involved in the delivery of the RUSI-led workshop to ensure continuity and consistency with other external training programmes.

The workshop was held from 5 to 8 September 2023 in Abuja, Nigeria’s administrative and political capital. In attendance were 19 public and private sector participants, representing agencies involved in or assisting on IWT-related financial crime cases. These included individuals from the following Nigerian agencies: NFIU Federal Ministry of Environment; Independent Corrupt Practices Commission (ICPC); Interpol National Central Bureau; Nigerian Customs Service; National Environmental Standards and Regulations Enforcement Agency (NESREA); National Parks Service (NPS); Economic and Financial Crimes Commission (EFCC); and the Federal Ministry of Justice (FMoJ). Of the total workshop participants, 32% identified as female.

The workshop was delivered by RUSI with support from the EIA, ANI, Western Union’s Financial Intelligence Unit – a team tasked with law enforcement outreach – and Standard Chartered Bank. The workshop agenda was designed to:

1. Complement and expand on training already undertaken by the NFIU, the EFCC, the EIA and the United Nations Office on Drugs and Crime (UNODC).
2. Ensure a common understanding of the scale and nature of IWT in Nigeria and further afield, including a detailed assessment of the financial dimension of local, regional and international IWT supply chains.
3. Improve confidence in applying technical skills and approaches in multi-agency financial investigations of IWT, using a supply chain approach.

7. RUSI, ‘Combatting the Illegal Wildlife Trade in West and Central Africa: Phase II’, < <https://rusi.org/explore-our-research/projects/combating-illegal-wildlife-trade-west-and-central-africa-phase-ii>>, accessed 2 August 2024.

8. Deutsche Gesellschaft für Internationale Zusammenarbeit, ‘Partnership against Wildlife Crime in Africa and Asia’, <<https://www.giz.de/en/worldwide/66553.html>>, accessed 2 August 2024.

4. Strengthen understanding of the role of the private sector in providing support to financial investigations and collating financial intelligence.
5. Conduct hypothetical case review exercises to develop and enhance financial investigative skills and build inter-agency collaboration.

Prior to attending the workshop, participants completed a pre-training questionnaire to assess baseline levels of knowledge and experiences to date. Following completion of the workshop, participants also completed a post-training questionnaire allowing for analysis of workshop learnings and to help inform this report. The workshop was followed by four bilateral meetings with members of the regulated financial sector to further discuss the themes raised in the workshop.

Nigeria's Role in IWT

A key topic of discussion during the workshop sessions and wider consultations centred around the role Nigeria plays in regional and global IWT supply chains. Participants recognised Nigeria's role as an exit point for international IWT flows and voiced concerns about Nigeria being a transit point – or what one participant called a 'weak link' – for wildlife poached across the wider region.⁹ Experts have warned that ivory sourced from as far as East Africa is being trafficked through Nigeria,¹⁰ and increases in large-scale, multi-commodity seizures demonstrate the embedded nature of OCGs in the trade.¹¹

In this context, participants voiced a need to improve mainstream awareness of IWT in Nigeria. IWT knowledge within agencies is usually limited to the few individual officers tasked with tackling the issue, and general societal awareness of the illegal and harmful nature of wildlife crime is still comparatively low. Many observed that poached wildlife is sold openly on roadsides and at junctions within both cities and rural areas, despite this being codified under national legislation as a crime. While efforts to increase awareness are under way, including billboard campaigns, such interventions are relatively new and have limited reach. Participants believed that historically weak enforcement had reinforced low levels of awareness, speculating that recent increases in IWT arrests could be publicised by civil society to raise awareness of IWT's illegality and deter involvement in IWT.

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9. EIA, 'Combating Wildlife Crime in Nigeria', p. 10; Interpol and ENACT, 'Illicit Goods Trafficking Via Port and Airport Facilities in Africa', p. 13; UNODC, 'World Wildlife Crime Report 2020', p. 19.
 10. Several participants stated that Nigeria is now widely acknowledged as the primary exit point for elephant ivory. Traffickers now utilise the Apapa Port Complex and other ports in Nigeria after having been displaced from East African ports such as the Port of Mombasa in Kenya. See Interpol and ENACT, 'Illicit Goods Trafficking Via Port and Airport Facilities in Africa', p. 13.
 11. Reid and Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa'.

In general, participants highlighted increasing political commitments to combatting IWT in Nigeria, including the publication of the NSCWFC in 2022 and recent progress on the Endangered Species Conservation and Protection Bill, which passed its first reading at the House of Representatives in late February 2024.¹² However, participants emphasised that corruption remains pervasive, acknowledging its role in facilitating IWT supply chains, in making Nigeria an appealing consolidation, transit and export point for OCGs, and in neutralising counter-IWT efforts. For example, experts warn that as much as 70% of the fees charged by corrupt shipping agents are used to bribe government officials and transport actors,¹³ and investigative journalists suggest that corruption and patronage are inhibitors of due process in the investigation and prosecution of IWT, especially concerning targets that are positioned further up the network hierarchies.¹⁴ Participants agreed that corruption disincentivises the initiation of financial investigations into IWT cases; one observed how corrupt state actors ‘are often above the law’.

Opportunities and Challenges for Improved IWT Financial Investigations

Large-scale wildlife trafficking in Nigeria is motivated by profit, yet financial investigations are rarely used to target the offenders, resulting in missed opportunities to investigate high-level actors or seize criminal proceeds. Policy frameworks support the understanding of anti-money-laundering (AML) risks associated with IWT, as well as the value of financial intelligence in IWT investigation. The NSCWFC expressly targets wildlife-related illicit finance under the objective ‘Remove enablers of crime’, identifying various outputs as critical to its success, including the completion of money-laundering risk assessments, ensuring that all relevant institutions possess capabilities to identify and report on wildlife-related illicit financial flows, and developing capacity in the NFIU and EFCC to conduct wildlife-related financial investigations and prosecutions.¹⁵

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12. *Environment Africa Magazine*, ‘Nigeria Wildlife Protection Bill Passes First Reading’, 28 February 2024, <<https://environmentafricamag.com/2024/02/28/nigeria-wildlife-protection-bill-passes-first-reading/>>, accessed 6 August 2024.
 13. EIA, ‘Out of Africa: How West and Central Africa Have Become the Epicentre of Ivory and Pangolin Scale Trafficking to Asia’, December 2020, p. 20.
 14. Ini Ekott, ‘In Nigeria, a Decade of Payoffs Boosted Global Wildlife Trafficking Hub’, *Mongabay*, 4 March 2022, <<https://news.mongabay.com/2022/03/in-nigeria-a-decade-of-payoffs-boosted-global-wildlife-trafficking-hub/>>, accessed 23 July 2024.
 15. Government of Nigeria, ‘National Strategy to Combat Wildlife and Forest Crime in Nigeria 2022–2026’, pp. 61–62

Yet despite such frameworks, as well as recent internal and external trainings already undertaken by the NFIU and EFCC, there is a lack of IWT-related AML prosecutions. This pattern is reflected in a wider trend identified by the Financial Action Task Force (FATF) – the global standard-setter for AML compliance – for whom ‘demonstrating a sustained increase in [money-laundering] investigations and prosecutions in line with [money-laundering] risks’ is one of the strategic deficiencies which led to Nigeria’s inclusion on the FATF ‘grey list’ in February 2023, which put the country under increased regulatory monitoring.¹⁶ There is evidence supporting this issue in the context of the workshop itself. For example, a high percentage of participants (71%) had experience of financial investigation in their day-to-day role, yet only a small percentage (12%) had been involved in an IWT case where financial intelligence was applied, and even fewer (5%) could identify a team member who could provide guidance on financial investigation in IWT cases. Therefore, despite significant progress in Nigeria, further efforts are needed to convert policy into practice and to ensure that the relevant cases are successfully sanctioned and prosecuted.

To ensure this goal is achieved, participants emphasised that future training inputs would require greater consistency, continuity and reach across relevant stakeholders. Sustained training or mentorship of individuals in a range of agencies, including a larger number of investigators and prosecutors, would help to mainstream good practice. Even if training activities only target the entry level, most felt such interventions would have significant impact. As evidenced via the questionnaires that monitored self-reported skills development resulting from the RUSI-led workshop, participants reported that they believed their skills had increased from ‘limited’ to ‘improved’ knowledge or understanding in relation to key markers, such as knowledge of financial investigation tools, understanding AML concepts and approaches, opportunities for financial investigations into IWT cases, and knowledge of global IWT case precedents. While a high proportion of participants (75%) claimed they were committed to sharing obtained knowledge with colleagues, it was felt that further capacity building in financial investigation for IWT still needs to be implemented, including on-the-job mentorship, technical skills training and the development of long-term, sustainable and certified curricula.

In the broader context, there was consensus among participants on the need for senior leadership endorsement of financial investigation as a standard operating protocol for IWT, particularly in high-value cases, suggesting a prerequisite to increase awareness and buy-in among high-level officers – including elected officials – to ensure that, as one participant put it, the ‘tone

16. FATF, ‘Jurisdictions Under Increased Monitoring’, 23 February 2024, <<https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-february-2024.html>>, accessed 18 March 2024.

from the top’ successfully creates the necessary ‘traditions and customary practices’ within the relevant agencies.

Even without existing organisational norms and best practice, participants recognised the importance of commencing financial investigations as early as possible. In wider discussions, participants also highlighted the need for greater inter-agency collaboration and increased efforts to understand and delineate institutional roles. Several participants observed that wildlife law enforcement officers may have no capacity to investigate suspicious transactions, meaning that early involvement of official financial investigators at the EFCC – the agency charged with the prevention, investigation, prosecution and penalisation of financial crimes in Nigeria¹⁷ – is crucial.

However, participants flagged that it remains the responsibility of other enforcement actors, including wildlife enforcement personnel, to trigger parallel financial investigations once a suspected offender has been apprehended, underlining the need for consistent entry-level training and coordination between all relevant agencies. Occurrences of disruption to inter-agency cooperation and information sharing on past and future investigations were attributed to structural-, bureaucratic- and resourcing-related delays.

In this context, participants understood the primary function of the NFIU as processing requests from enforcement agencies and analysing suspicious transaction reports (STRs) from the private sector. However, there was far less awareness of the types of financial intelligence available and the breadth of regulated entities which have to report to the NFIU. Additionally, there was confusion over roles and responsibilities in processing mutual legal assistance requests. Participants noted that such requests often get ‘stuck’ and rarely receive responses or lead to further action. Others acknowledged that there was room to improve internal collaboration channels between the functions of investigators and prosecutors within individual agencies, such as the NPS, ICPC, EFCC, FMOJ and NESREA, which all have prosecutorial powers.

On this, many participants flagged the importance of involving the judiciary in capacity building on IWT. Representatives of multiple agencies emphasised the benefits of greater interactions between enforcement and justice actors. The lack of ‘judicial will’ to consider IWT offences as a serious matter was seen by some participants to be the primary obstacle to effective prosecution, even if a strong case was built – an issue one participant felt was exacerbated by weak penalties and the practice of compounding offences before a case reaches court. Investigative journalists in Nigeria have reported that conservationists and some

17. EFCC, ‘About Us: The Establishment Act’, <<https://www.efcc.gov.ng/efcc/about-us-new/the-establishment-act>>, accessed 23 July 2024.

government officials believe the practice of compoundment encourages corruption and undermines deterrence.¹⁸ Assuming that the Endangered Species Conservation and Protection Bill becomes law, penalties on IWT will significantly increase in future. Including the judiciary in future workshops would likely improve its understanding of the scale and gravity of IWT, including the associated money-laundering risks, and provide opportunities to educate prosecutors and investigators on correct court process through peer-to-peer learning, which would support the judicial enforcement of tougher penalties on IWT. Absent in participant responses was any explicit mention of the role played by corruption in the courtroom, but Transparency International cites examples of extortion and political interference in the Nigerian judiciary,¹⁹ suggesting that this also plays a significant role in undermining IWT prosecutions.

Finally, during reflections on a training presentation about the ‘Shuidong Connection’ – the EIA investigation into a criminal syndicate that trafficked ivory from Africa to Shuidong in China for over two decades – several participants suggested that there was also a need for better cooperation between national and international agencies.²⁰ The lack of formal structures for collaboration was observed to hamper cooperation on international investigations, including in cross-border cases with neighbouring countries, such as Cameroon. Nigeria and Cameroon have since agreed on a Memorandum of Understanding on ecosystem conservation, inclusive of cross-border counter-IWT activities, which will provide a formal framework under which cooperation may be improved.²¹ A recent report by Transparency International, however, shows that the FATF still finds that Nigeria lacks the necessary legal and technical frameworks to enable effective international cooperation.²²

The Role of the Private Sector

As elsewhere, the role of the private sector is undervalued in relation to IWT in Nigeria. Banks and other regulated financial institutions have a crucial and often overlooked role in supporting the prevention, detection, investigation and

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18. Ekott, ‘In Nigeria, a Decade of Payoffs Boosted Global Wildlife Trafficking Hub’.
 19. Paul Banoba, Robert Mwanyumba and Samuel Kaninda, ‘CPI 2023 for Sub-Saharan Africa: Impunity for Corrupt Officials, Restricted Civic Space and Limited Access to Justice’, Transparency International, 30 January 2024, <<https://www.transparency.org/en/news/cpi-2023-sub-saharan-africa-corruption-impunity-civic-space-access-justice>>, accessed 23 July 2024.
 20. See EIA, ‘The Shuidong Connection: Exposing the Global Hub of the Illegal Ivory Trade’, July 2017, <<https://eia-international.org/wp-content/uploads/EIA-The-Shuidong-Connection-FINAL.pdf>>, accessed 12 March 2024.
 21. Zeniat Abubakar Abuja, ‘Nigeria Signs MoU with Cameroon on Ecosystem Conservation’, 19 April 2024, <<https://von.gov.ng/nigeria-signs-mou-with-cameroon-on-ecosystem-conservation/>>, accessed 21 April 2024.
 22. Andy McDevitt, *Risks of Illicit Financial Flows in Africa: Understanding Vulnerabilities to Corrupt Money Flows in Nine Countries*, (Berlin: Transparency International, 2024), pp. 39-42.

understanding of IWT-related financial crime. Furthermore, within the context of the multifarious AML and terrorist-financing risks faced by financial entities in Nigeria, wildlife trafficking is relatively low priority. As a result, there has been little cross-sector engagement in terms of ensuring effective private sector AML compliance on IWT risk indicators.

While some of the public sector participants (38%) had worked with the private sector during non-IWT financial investigations, few (3%) had worked with the private sector on wildlife cases. Several public sector actors commented that past attempts at collaborating on IWT investigations had been met with an unwillingness to cooperate on the part of the private sector. However, during discussions with representatives of the financial sector, there was considerable appetite to begin proactively tackling IWT in collaboration with the authorities. Fundamentally, there was tangible evidence of the absence of cross-sector cooperation on IWT: banking compliance officers confirmed that no STRs linked to IWT had ever been logged by their banks, despite there being seven STR codes relating to wildlife.

Further, workshop discussions highlighted concerns around STR processing. A few participants noted the practice within investigating agencies of assigning low-priority STRs to junior officers who are tasked with ‘clearing’ the backlog. This raised concerns that IWT-related STRs, when and if they are forwarded to the relevant authority, may not receive the proper prioritisation and resources. There was, however, consensus among public sector participants that the private sector was a useful ally in conducting financial investigations on other predicate offences, suggesting that IWT collaboration is under-exploited in the sector.

Intelligence on financial modalities for OCGs trafficking wildlife out of West Africa suggests that perpetrators repeatedly utilise the same financial channels to facilitate criminal activity, because they are largely unchallenged and unmonitored. A 2020 EIA report suggests traffickers in Nigeria have previously disclosed to undercover investigators that they can transfer as much as NGN 1 billion – worth \$2.6 million at the time – through their accounts without flagging suspicion.²³ For example, Asian buyers will send large, rounded sums of money in payment for IWT consignments via conventional international banking systems. While this figure is only worth approximately \$600,000 (equivalent to £470,000) at the time of writing, due to currency fluctuations, it remains substantial. More recently, the 2022 NIRA of Money Laundering in Nigeria suggests that efforts are made to disguise such transactions by breaking them up into multiple smaller deposits or transfers or using less-regulated foreign exchange bureaus instead of mainstream commercial banks.²⁴

23. EIA, ‘Out of Africa’, p. 20.

24. NRA Forum, ‘National Inherent Risk Assessment of Money Laundering in Nigeria’.

Comparatively high levels of settlement by Asian investors in Nigeria also help create opportunities for easy obfuscation of transcontinental IWT-related product and money flows, including domestic bank transfers from local buyer accounts and the use of companies in trade-based money-laundering. The practice of Chinese *fei qian* ('flying money') is also popular in Nigeria for facilitating transcontinental payments. Some participants observed that local OCGs may use their wives' and girlfriends' bank accounts as proxies to receive or move funds around; this aligns with observations made in the 2022 NIRA about the use of family members' accounts for illicit finance related to bribery, corruption and drug trafficking.²⁵ The gaps and contradictions in knowledge of these IWT-related financial typologies reflect participants' requests for more information on IWT-generated illicit financial flows.

As per their experience in combatting terrorist financing and trafficking of other illicit commodities (for example, drugs, gold and diamonds), representatives of the private sector were confident that efforts to counter IWT-related financial crime could be strengthened through both the proactive prevention or monitoring of IWT-related financial crime (for example, customer due diligence and STRs) and reactive support for public sector financial investigations into wildlife offending (for example, responding to production orders, testifying in court). The financial sector holds valuable data which can be used to inform wildlife intelligence, helping to identify or prioritise leads and map the OCG networks involved in the trade.

Many financial institutions identified an opportunity for the Central Bank of Nigeria, which is the financial regulator and has overall responsibility for the administration of federal government regulation, to play a greater role in leading on the effort to combat IWT. It was noted by several participants that the Central Bank has been absent from discussions to date and should be included in future engagement. Specifically, it was also suggested by several participants that with greater involvement from the Central Bank, there may be opportunities to integrate explicit IWT considerations into the interpretation of Nigeria's Sustainable Banking Principles.²⁶

Bridging the gap between the public and private sectors in Nigeria and fostering improved multi-directional information-sharing mechanisms was therefore considered a priority. This aligns with further interventions that have taken place in Nigeria in recent years advancing public-private partnership (PPP) in relation

25. For bribery and corruption, see *ibid.*, p. 21; for drug trafficking, see *ibid.*, p. 29.

26. The adoption of the Sustainable Banking Principles by the Central Bank of Nigeria in July 2012 meant the integration of social and environmental considerations into operations, policies, processes and procedures at the industry level. See Central Bank of Nigeria, 'Implementation of Sustainable Banking Principles by Banks, Discount Houses and Development Finance Institutions in Nigeria', 24 September 2012, <<https://www.cbn.gov.ng/out/2012/ccd/circular-nsbp.pdf>>, accessed 22 March 2024.

to IWT. In June 2023, public and private sector representatives met and established a working group for developing a PPP on IWT.²⁷ A further meeting with representatives of the Association of Chief Compliance Officers of Banks in Nigeria (ACCOBIN) was planned by the working group, alongside a series of virtual engagements with the heads of financial institutions, to define and disseminate a two-year action plan for the PPP. This has now evolved into plans to develop a broad PPP encompassing all predicate offences, not just IWT, modelled on similar initiatives undertaken in other regions, such as the South African Anti Money-Laundering Integrated Task Force.²⁸ Furthermore, in July 2024 the United for Wildlife Financial and Transport Taskforces launched a West Africa chapter,²⁹ which will provide a framework for greater information sharing between private sector actors at a regional level and their national public sector counterparts, focused on galvanising participants from high-risk private sector ‘reporting entities’ such as banks and money or value transfer services, key supply chain actors, and relevant public sector stakeholders to engage in the fight against IWT.

Conclusion

With Nigeria’s role as a source of and transit hub for large-scale flows of IWT, its agencies are under increasing pressure to tackle the issue. Due to the involvement of OCGs motivated by profit and the industrial scale of the IWT flows, wildlife crime is a major source of illicit finance. Insights provided by stakeholders engaged for this project reflect a widespread appetite in Nigeria for applying ‘follow the money’ techniques to wildlife investigations, to identify and prosecute senior criminal actors involved in the crime. However, there are still several barriers to the mainstreaming of parallel IWT financial investigations. As in many other jurisdictions, policy frameworks are in place but there is a lack of tangible progress in IWT-related money-laundering prosecutions.

The key themes emerging from public and private sector discussions conducted as part of the RUSI-led training workshop held in September 2023, suggest that the following factors comprise the key barriers and opportunities along Nigeria’s path to progress on ‘following the money’ in IWT:

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27. EIA, ‘Biodiversity Challenge Funds Project Half Year Report HYR3 – Disrupting International Wildlife Trafficking Networks in West and Central Africa’, 31 October 2023, <<https://iwt.challengefund.org.uk/documents/XXIWT101/25241/IWT101%20HYR3%20-%20edited.pdf>>, accessed 15 August 2024.
 28. The South African Anti Money-Laundering Integrated Task Force was created in December 2019 as a public–private partnership between institutions from the banking sector and regulatory agencies.
 29. The United for Wildlife Financial and Transport Taskforces bring together civil society organisations, transport intermediaries and financial institutions (including banks and mobile money operators) to detect and report illicit financial activity related to IWT. Private sector members receive alerts about new wildlife-trafficking incidents, strategic bulletins and operational details, such as the names of offenders.

- **Corruption is pervasive and undermines efforts to counter IWT:** Corruption plays a key role in making Nigeria a key consolidation, transit and export point for illicit wildlife flows from across the African continent and disincentivises effective financial investigations of IWT.
- **Capacity gaps continue to exist around using financial intelligence in IWT cases:** More consistent training inputs and resources are required across the relevant Nigerian agencies and the private sector, including for prosecutors and judicial officers. Future activities should reflect demand for on-the-job mentorship and technical skills training, and – in the long term – should promote the development of locally accredited courses.
- **Greater inter-agency collaboration and coordination is required:** A lack of synergy exists between agencies at the national and international levels, with confusion over institutional roles and responsibilities, especially surrounding financial intelligence requests and mutual legal assistance. Clearer delineation of institutional roles and greater inter-agency collaboration will help strengthen IWT outcomes.
- **The private sector is an undervalued resource in the fight against IWT:** Banks and other regulated financial institutions play a critical but often overlooked role in combatting financial crime. The private sector has proved a useful ally in tackling money-laundering related to other predicate offences, suggesting significant potential to bolster financial investigations into IWT cases through greater public-private collaboration.
- **There is need for increased awareness of IWT in mainstream society:** Low societal awareness of the illegal and harmful nature of IWT is reflected in the broader enforcement and financial compliance infrastructure in Nigeria. Strengthening general awareness of IWT thus has the potential to improve efforts to counter IWT-related financial crime.

Addressing these issues will be key to the success in combatting IWT in Nigeria, as well as disrupting criminal demand for wild flora and fauna from across the African continent. Additionally, such actions would contribute to curbing the growth of organised crime and corruption in Nigeria and the wider region. Nigeria has made and continues to make vital strides in strengthening its governance of IWT and wildlife-related illicit finance. However, the effectiveness of the country's new and emerging policies and legislation have yet to be proven in the courts. Addressing corruption, building capacity, improving national and international cooperation, harnessing the private sector, and strengthening mainstream awareness of IWT are all important milestones towards this goal.

About the Authors

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