



**TRAFFIC**

# Switching Channels

*Wildlife trade routes  
into Europe and the UK*

A WWF/TRAFFIC Report

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TRAFFIC, the wildlife trade monitoring network, works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. It works in cooperation with the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

TRAFFIC is a joint programme of WWF and IUCN The World Conservation Union.

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## **INTRODUCTION**

Illegal wildlife trade routes are difficult to uncover. By their very nature they are covert, sometimes run by organised criminals, and often used to smuggle other commodities such as drugs and guns. This report attempts to uncover some of these complex trade routes into Europe and the UK, as well as the techniques used to smuggle wildlife. It is based on research commissioned by WWF and TRAFFIC, the wildlife trade monitoring network, and independently conducted by the University of Wolverhampton which uses evidence from HM Customs and Excise, the Police and a number of court cases.

## **THE SIZE OF THE LEGAL TRADE IN WILDLIFE**

It must be remembered that there is a huge *legal* market for wild plants and animals – a market which the illegal trade undercuts, supplants and exploits. Unscrupulous individuals, rogue traders and criminal gangs all threaten sustainable and responsible businesses that provide vital income to some of the world's poorest countries.

The global legal trade in wildlife resources was estimated in the early 1990s to be worth nearly US\$159 billion a year in export value. Sixty five per cent of this trade involves timber exports (worth US\$104 billion), with fisheries exports constituting a further 25 per cent (US\$40 billion). Trade in live animals, plants, products and derivatives was therefore estimated to be worth approximately US\$15 billion annually.

The legal trade in protected species broadly flows from range areas – where the species come from – to consumer areas. Some are both significant consumer and range areas. The situation is made more complex by a thriving trade in captive-bred or artificially propagated specimens, which may be farmed in non-range areas and traded internationally. The involvement of intermediate destinations and the consequent re-export trade further complicates the picture and opens up opportunities for illegal trade.

## **METHODS EMPLOYED IN ILLEGAL WILDLIFE TRADE**

Criminals who engage in the illegal wildlife trade are often merely transferring the skills, connections, transport routes, counterfeiting and concealment techniques they have developed in the areas of drugs, small arms or human trafficking.

The skills used by these people will depend on the type of illegal shipment, which may contain live animals or plants, dead animals or unprocessed parts (e.g. taxidermy specimens, skins, tusks, bones, trophies), dead plants or parts (e.g. dried flowers, ginseng roots, fibres) and processed or worked parts (e.g. carved ivory, traditional Asian medicine ingredients, tanned skins, sawn timber).

### **Intermediate destinations**

Illegal trade in wildlife is often not conducted directly between range area and consumer area, but specimens may be transported to a variety of intermediate destinations. As with many types of international trade, intermediate destinations are a common feature of illegal wildlife trade routes and can serve five broad functions:

- 1 “funnel” locations where shipments are bulked for longer-haul journeys;
- 2 stopovers and convenient ports – these may be ports where illegal wildlife shipments are switched between different modes of transport. For instance, shipments might be switched between surface and air transport;
- 3 processing centres – where products made from wildlife are manufactured;
- 4 transshipment centres and “free” trade areas – countries where porous borders, weak legislation and lax enforcement allow the illegal import and export of wildlife to continue unhindered, and provide suitable transshipment locations for wildlife trafficking<sup>1</sup>;
- 5 regional distribution centres – these are close to final destinations and provide places where bulk shipments are broken down into smaller consignments and transported on to the consumer market.

### **Techniques used to avoid Customs**

Like other smugglers, wildlife traffickers go to great lengths to cover their tracks and conceal their offences. They do this in a number of ways, but usually employ three general techniques:

- 1 **disguising** illegal items so that they will pass through customs checks as legal imports. This involves either changing the appearance of the items, or providing fraudulent documentation, or both;
- 2 **concealing** the illegal items within legal shipments;
- 3 **evading** customs controls by making wholly illegal shipments;

Other methods may be more blatant – such as shipping to locations where open sale of these items is not illegal or where enforcement is particularly weak.

The following examples illustrate the lengths to which smugglers will go in order to conceal shipments:

- ivory has been dyed to appear like wood and concealed in timber shipments;
- rare bird chicks have been mixed with shipments of hen chicks from India;
- a rhino horn was hidden inside a statue made from plaster of Paris.

Wholly illegal shipments to the UK include the example of Raymond Humphrey and his co-conspirators, who took birds of prey from Thailand, concealed them in suitcases and flew them direct from Thailand to the UK.

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<sup>1</sup> These areas may also become processing centres, where manufacturers take advantage of the freedom of movement of raw materials and finished products, and the ready access to markets where the finished products may be passed off as legal.

## **SOURCE COUNTRIES: PROCESSING AND TRANSIT**

Skin, fur and fleece products and traditional Asian medicines (TAMs) – including parts of endangered reptiles, tiger, rhino, antelope and bear – are manufactured from raw materials that are gathered from a range of countries, and transported to processing centres where manufacture takes place. Finished products will be shipped on in bulk after processing. Some examples of processing and transit include reptile skins and shahtoosh products.

- **Reptile skins** must be tanned, cut and manufactured into products such as watch straps and handbags. This results in flows of untanned skins into Europe, where tanneries are located. They are then re-exported to plants in other countries for cutting and manufacture. The multiple re-export and changing size and appearance of the skins has often been exploited to launder illegally obtained skins in with legal shipments. The finished products are then re-exported to Europe for sale.
- **Traditional Asian medicine** manufacturers operating in the Far East gather shipments of endangered species or their parts and derivatives from all over the world, including tiger bones from India, bear gall bladders from Asia and North America, and musk deer glands and ginseng from China and Russia. The packaged medicines are distributed within Far East markets, and to Europe and North America through commercial shipments and small quantities carried by passengers.
- Manufacture of **shahtoosh** shawls in India, made from Tibetan antelope fleeces, are transported from the range areas in China to the north of the country. Finished articles are distributed to consumer markets in Asia, Europe, North America and the Far East.

## **GLOBAL TRADE ROUTES**

Between 1997 and 1999, the UK accounted for 12 per cent of all European Union (EU) exports and re-exports of permitted consignments of CITES<sup>2</sup> and European Community (EC)<sup>3</sup> listed species. Research shows that the principal destination was Asia – which was also the largest source of imports and a key range area. This not only illustrates the importance of the UK in the chain of trade in protected species, but also signals the potential opportunities for illegal trade to exploit networks and routes used by the legal trade.

Historically, the most significant transshipment centres for the illegal wildlife trade have been Hong Kong and Singapore. However, recent research points to the United Arab Emirates (UAE) as a centre of growing importance. The UAE as a nation state has joined CITES, but partly because each emirate in the federation maintains a separate enforcement policy, the record of the UAE overall has been very poor in terms of compliance with, and enforcement of, CITES. There is a bustling free trade zone in the Dubai emirate, and the Blue Souk in Sharjah is notorious as a market where endangered species are openly on sale. In a recent response to enquiries regarding the open sale of skins of tigers and other CITES-listed species, a Dubai Economic Development spokesman said:

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<sup>2</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora

<sup>3</sup> The principal EC regulation seeks to govern the trade in species of fauna and flora or derivatives listed in four Annexes (A-D).

“Currently the sale of any type of skin is allowed to take place in UAE, whether they come from cows or tigers. The fact that the skins were illegally smuggled from the original country and then brought illegally into the UAE is not our concern. International trade may be illegal, but actually selling them here is not.”

In November 2001, the CITES Secretariat stated it had “discovered that much of the caviar worth \$25 million that left the UAE during the first 10 months of this year appeared to be of unlawful origin”. At the same time, there is evidence that the UAE may be used as a centre for money laundering and that it may be becoming a transshipment centre for heroin. Once again, the potential for links between the global illegal wildlife trade and the drugs trade are clear. Much of the caviar was destined for markets in Europe and the US.

**Figure 1. Caviar trafficking to EU and US markets through UAE**



In 2001 the prosecution of US Caviar & Caviar in the US demonstrated the involvement of an American labelling firm located in the UAE and applying counterfeit labels to illegally harvested caviar. There is mounting evidence that caviar traders operating in the UAE are increasingly involved in the illegal trade.

Wildlife smuggling can also be a response to other desires and markets, as in the case of illegal hunting. In November 2001, following a lengthy undercover investigation, the US Fish and Wildlife Service prosecuted five people in Missouri for smuggling endangered leopards and tigers into the US so that they could be hunted and killed. Similar undercover operations in India have revealed that hunters will pay vast sums to hunt and kill endangered species such as tigers, Tibetan antelope, brown bears and clouded leopards. In another recent US court case in

May 2002, eight men were indicted on charges which included killing and trading tigers and leopards and selling the meat for human consumption.

## **EUROPEAN MARKETS**

Western Europe is an important market for the trade in protected species. UNEP-WCMC data for the western EU countries demonstrates that between 1997 and 1999, the EU imported 22,878 permitted consignments of CITES-listed species and products (of these, 11 per cent were imported into the UK), and exported 15,646 consignments – a net import of around 2-3,000 consignments a year, when each shipment may contain tens of thousands of items or just a few specimens. This signals the importance of the EU both as a market and an intermediate destination for wildlife products.

The UK plays an important role in the wildlife trade as both a consumer and a re-exporting (intermediate) country. The main sources of imports into the UK are range areas in Africa and Asia – as they are for the EU as a whole.

The US is the largest exporter of consignments to the EU, and while some of the species involved are native to that country, most are not. In some cases, exports of non-native species from the US represent intermediate or transit trade from other range areas (for instance, numerous parrot species are imported from Central and South America). It should be noted that some trans-Atlantic shipments consist of captive-bred or artificially propagated specimens for sale in Europe.

Indonesia is the second largest exporter of consignments to the EU, and many of the species exported are native to Indonesia itself. Hence much of this trade is direct from state of origin to the destination market.

## **EXAMPLES OF TRADE ROUTES TO THE UK AND EUROPE**

The trade in controlled species into Europe is helped by well-developed ports and cargo handling capabilities, as well as high volumes of international trade in general commodities. This is reflected in the role of countries such as the US and South Africa as exporters of CITES-listed consignments to the EU and the UK. In addition, almost all trade to Switzerland and the Czech Republic is likely to be intermediate or transit: because of these countries' land borders with the EU, there are many opportunities to smuggle illegally traded wildlife into the EU.

Some states shipping significant numbers of permitted CITES consignments into the EU may have particular connections with EU countries for a range of reasons – former colonial rule, common languages, currencies and, in some cases, favourable trade arrangements. For instance, Suriname is a former colony of the Netherlands, and the two countries maintain a special trading relationship with less stringent import controls – between 1997 and 1999, 31 per cent of Suriname's exports of wildlife to the EU arrived at Dutch ports. The fact that the Netherlands also had the highest number of wildlife shipments in the EU during this period stresses the leading role played by that country in the export and re-export of protected wildlife, and suggests that it could be a major illegal import destination into the EU.

Trade routes are developed not only by the opportunism of illegal wildlife traders who exploit loopholes, weak enforcement procedures and changing local enforcement efforts or priorities, but also, in some cases, through detailed intelligence. The following examples of illegal trade look at the sometimes complex routes taken from range areas to intermediate and consumer areas, much of which is destined for markets in the EU and the UK:

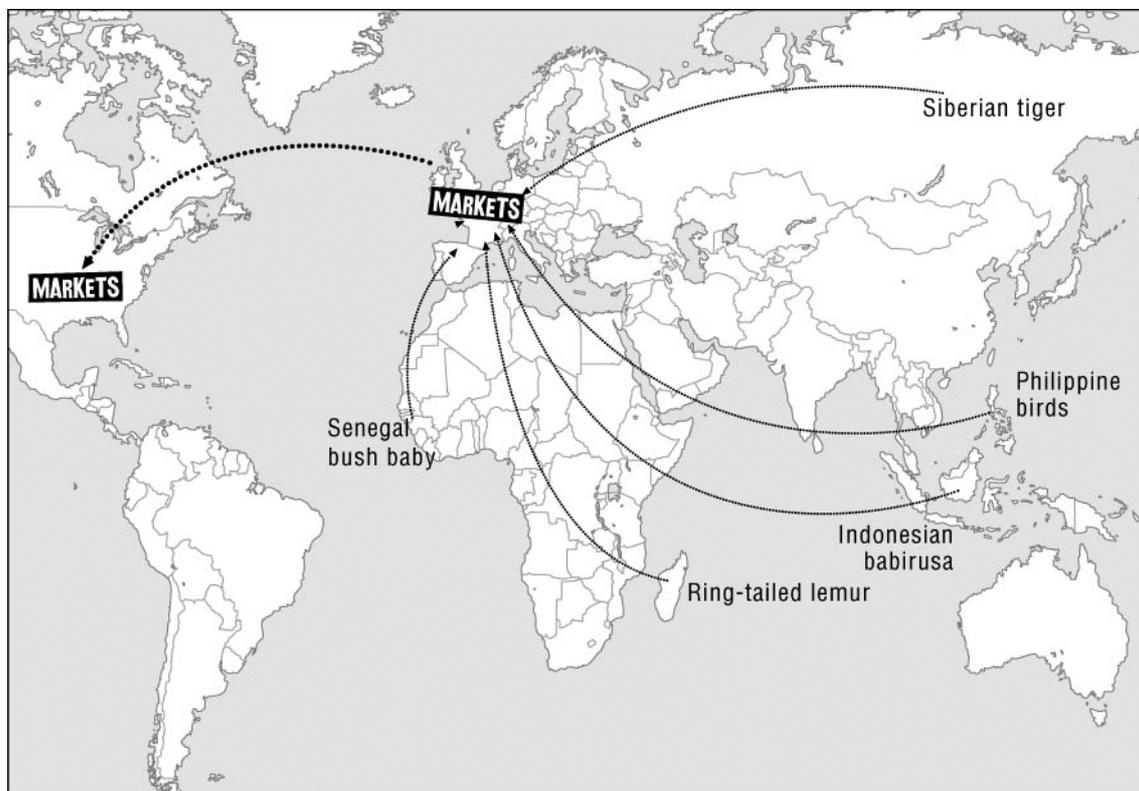
- Hummingbirds from South American countries have been smuggled to Suriname across poorly controlled land borders, or by coastal or river transport. From Suriname, shipments proceed to the Netherlands. Bird traders may then purchase these birds and take them into the UK.
- A trader smuggling birds from Guyana used a tortuous route involving several stopovers (see Figure 2). The birds were taken by boat to Grenada – sometimes via Suriname – where the trader owned a zoo, effectively laundering them into the legal market. They were then moved to Barbados and flown to Havana, then on to Moscow and Hungary, from where the birds were transported overland into western European markets. The same trader was thought to use another route from Moscow to Singapore, where he would pick up black cockatoos from Indonesia and smuggle them back to the West Indies.

**Figure 2. Guyana to the EU – a tortuous trade route for smuggling exotic birds**



- Nicolaas Peters, a Dutch national, had been involved in trading wildlife specimens around the world for 18 years, mainly for the taxidermy trade. Although based in Wales, his main wildlife trading centres were in Belgium and the Netherlands. He had a string of convictions for wildlife trade offences, including fines in Germany for trading without permits, in England for the illegal possession of protected wildlife, in France for smuggling wildlife and in Australia for smuggling dead birds and insects. Following a tip-off from a taxidermist, HM Customs and Excise (HM C&E) raided Peters' house with wildlife investigators from TRAFFIC and the RSPB, and discovered more than 700 dead specimens including many highly endangered species. Three hundred bird specimens had originated from the Philippines and included at least 42 CITES-listed species. Other seized items included a Siberian tiger skull, a Philippine eagle skull and a ring-tailed lemur – all fully protected under CITES.

**Figure 3. The global extent of Peters' UK-based illegal wildlife trade**

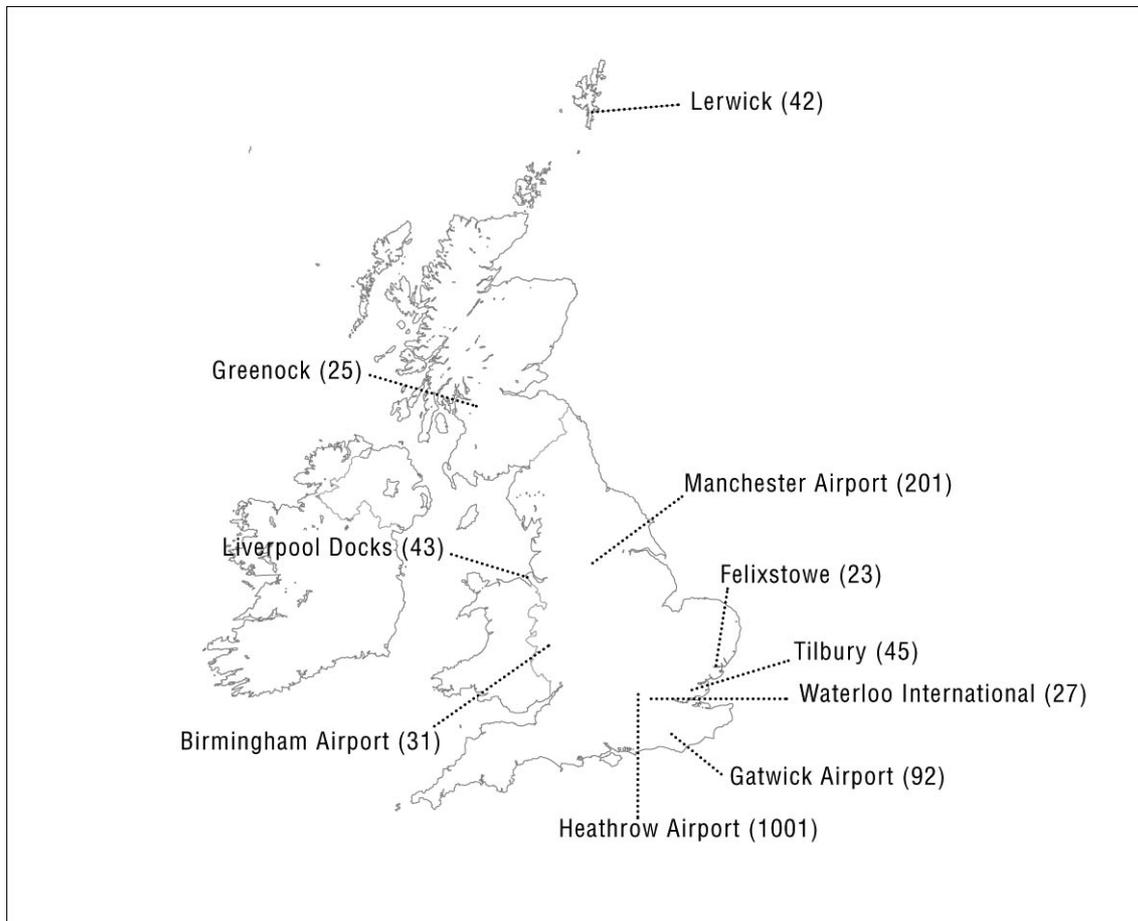


A further raid in Belgium found a larger stockpile of specimens. Papers discovered at Peters' home revealed his involvement in organising the killing and smuggling of birds from the Philippines, and the identity of an official to be bribed. Peters had also exported many specimens to the US, either without licence or under licences issued in Belgium, which he re-used illegally. The global reach of Peters' operation is illustrated in Figure 3 above, and it is clear that he used Belgium as his major port of entry into the EU because he considered there was less risk of detecting the smuggling of goods into Belgium than directly into the UK. Once the wildlife had illegally entered the EU, he was able to transport it throughout the EU virtually unhindered.

## ILLEGAL TRADE FLOWING INTO THE UK

By definition, the hidden nature of wildlife trafficking makes it difficult to establish the full extent and patterns of illegal trade flows into the UK, but we can get an indication of this through looking at customs seizures of wildlife goods. HM C&E maintains records of seizures of all CITES and EC-listed species where illegal consignments are detected at UK ports. A breakdown of seizures over the period 1996 to 2000 shows that seizures have remained fairly constant, despite changes in Customs staffing and priorities over this time. Further, an analysis of the regions from which consignments are shipped to the UK demonstrates similarities with the pattern of permitted imports.

**Figure 4. HM C&E seizures at customs stations for the ten stations with most seizures, 1996-2000<sup>4</sup>**



<sup>4</sup> Source: HM C&E. Customs 'stations' are not always strictly ports – for instance, Waterloo International has a customs station for travellers arriving on Eurostar who have travelled from outside the EU, but Waterloo is not a port. Note that the figure for seizures at Heathrow includes 610 instances where the seizure location is recorded as 'London Airports', the great majority of which are attributable to Heathrow. Note also that seizures at Lerwick consist in the main of small quantities of goods seized during searches of east European fishing vessels.

Heathrow airport is by far the most frequent location for wildlife seizures, followed by Manchester and Gatwick airports. These patterns not only reflect the routes of the illegal trade and entry points used by wildlife smugglers, but also the numbers (and priorities) of HM C&E staff at those ports. They also reflect the effort and expertise of Customs staff at Heathrow. It should be noted that these seizures are achieved despite the higher organisational priorities which HM C&E is mandated to work to, including drug smuggling and duty-bearing products such as alcohol and tobacco.

Seizures and inspection by Customs officers can only be conducted where border controls are in place. The permeability of borders within the EU means that illegal trade also enters the UK through member states with little or no monitoring. To address the challenges of the illegal wildlife trade effectively, it is essential to consider the ways in which the *legal* global trade is regulated across and within national borders. The EU has established a single market among its member states, based on principles of free circulation of goods, people, services and capital. In order to achieve this, a framework, in the form of a customs union operational from March 1993, was developed so that common rules exist at its internal borders.

**Table 1. Seizures of illegally imported CITES/EC-listed species at UK ports by HM C&E, 1996-2000**

Year	Total
1996	442
1997	495
1998	497
1999	336
2000	441
<b>Total</b>	<b>2,211</b>

Numbers of smuggled consignments tell only part of the story. Numbers of items within those consignments, and the species they comprise, need further investigation. A recent analysis of seizure records for 1999 and 2000 helps clarify some of these points and indicates that:

- approximately 17 per cent of seizures were of live animal specimens;
- dead items, ranging from taxidermy specimens to traditional Asian medicine pills, made up 75 per cent of seizures;
- only 7 per cent of seizures were of plants, the majority of which were rare orchids which sometimes arrived in large shipments from Taiwan;
- nearly half – 47 per cent – of all live animal specimens seized were reptiles, reflecting their popularity as exotic pets and the ease of transporting them;
- parrots and macaws made up 18 per cent of live animal seizures;
- 60 per cent of live animal seizures could be categorised as small consignments, representing either the smuggling of a few valuable specimens, or tourists returning with pets purchased abroad – in the latter case often from Morocco and usually tortoises. Other small seizures represented the undeclared excess numbers in shipments where the number of specimens was under-declared;

- TAMs represented 26 per cent of dead item seizures, often consisting of packaged pills and plasters, but also arriving as ingredients – American ginseng was commonly seized in consignments from the US, while 84 per cent of seizures of consignments arriving from China contained TAMs;
- goods manufactured from reptile skins (mainly watch straps and wallets) constituted 17 per cent of dead item seizures, and were often imported from Switzerland, the US or Nigeria;
- dead corals and seashells (usually conch) made up 21 per cent of dead item seizures but were almost always found in small quantities, reflecting the frequency with which tourists bring back items such as these as souvenirs;
- of the 32 incidents of caviar seizure, the 12 direct shipments from Russia and Iran (both range areas) were mainly of large consignments; six illegal shipments from Dubai (part of the UAE) illustrate the UK’s role as a market for caviar trafficked through the UAE;
- the number of ivory seizures was small (36 in total), in part reflecting the successful suppression of ivory trading into the UK. The seizures consisted of raw ivory (10) arriving mainly from African exporters, and worked ivory (26) from a mixture of range and non-range areas, including Indonesia and the US.

The five countries that consigned most shipments of endangered wildlife to the UK in 1999 and 2000 are listed in Table 2 below. What is clear from this table is the preponderance of live shipments from the US, where few endangered species are native, reflecting the substantial trade in captive-bred specimens that finds markets in Europe. The role of another non-range state – Switzerland – in relation to dead items is in part attributable to the large numbers of reptile skins (some as watchstraps) that are exported from Switzerland to the EU, but the figures also help confirm Switzerland’s role as an entry point into the EU and a stepping-stone to UK markets.

**Table 2. Numbers of seizures at UK ports by type of seizure, 1999-2000**

Country	Live Animals	Country	Dead Items	Country	Plants
US	21	China / Hong Kong combined	117	US	8
Morocco	13	US	71	Malaysia	8
Indonesia	6	Switzerland	21	Taiwan	7
Singapore	5	Thailand	20	Ecuador	5
Ghana / Lebanon (=)	4	Jamaica	17	Australia	3

While aircraft are the predominant mode of transport used, it should also be remembered that many illegal wildlife shipments entering the UK are made by surface means, and by postal distribution systems. The figures for international postal depots show 123 seizures at the principal air mail sorting depot at Coventry.

**Table 3. Number of seizures at international postal depots 1996-2000**

<b>Depot</b>	<b>No. of seizures</b>
Coventry International Hub	123
Mount Pleasant Parcel Post Depot	37
Dover Parcel Post Depot	21

### **MARKET DISRUPTION IN THE UK – UNCOVERING THE ILLEGAL TRADE**

The work of the new National Wildlife Crime Intelligence Unit within the National Criminal Intelligence Service will undoubtedly contribute to the effectiveness of the UK's enforcement efforts and could, through Europol and Interpol collaborations, play a significant part in EU-wide efforts to disrupt the illegal wildlife trade. However, with more countries hoping to accede to the EU (they are generally less affluent than current members and are often existing or potential transit states for the illegal wildlife trade) and other agreements that give certain states preferential access to the EU single market, there is an urgent need for more effective internal controls to combat the illegal wildlife trade. The need for effective EU-wide enforcement capacity will become even more urgent if the recently indicated willingness of the EU to join CITES as an entity is carried forward.

Illegal markets, at national levels, can also be interrupted by concerted enforcement action. For instance, in February 1995 the Metropolitan Police (together with forces in Birmingham and Manchester) launched Operation Charm, and raided Chinese pharmacies to follow up evidence obtained in an investigation by TRAFFIC International. As a result, several thousand illegal medicine products were seized, together with body parts of tiger, rhino, bear and other species. Although these seizures were felt to have had a clear impact on the illegal trade, the markets for these products still drive the supply, and Operation Charm has become a continuing initiative with wider aims to combat many aspects of the illegal trade. These include seeking to raise the level of public awareness about the illegal trade in endangered species.

## RECOMMENDATIONS

- 1 In the UK, HM Customs and Excise should give a higher priority to detecting and preventing wildlife trafficking, taking into account both the inherent seriousness of the ensuing environmental damage, and the evident linkages to the drugs trade. Similarly, higher priority should be given to the detection and disruption of illegal trading within the UK by police forces.
- 2 In the UK, changes need to be made to the law, by increasing penalties from two to five years imprisonment which will automatically make wildlife trade offences arrestable.
- 3 In the UK, sentencing guidelines should be developed and provided to the judiciary, and additional training should be given to both prosecutors and the judiciary to increase their awareness of the impact of the illegal wildlife trade.
- 4 More effective cooperation should be promoted with the EU Customs Union, through joint training and exchange and placement schemes, which should be facilitated by the European Commission and the World Customs Organisation.
- 5 Data, intelligence and best practice should be shared among relevant statutory and other bodies, including non-governmental organisations.
- 6 A common methodology/framework for assessing the value and seriousness of wildlife trafficking should be developed across CITES signatories.
- 7 The National Wildlife Crime Intelligence Unit (NWCUI) can play a vital role in providing intelligence to assist Customs in the following:
  - Development of effective and regular risk assessments and targeting procedures. This will ensure that Customs receive early indications of any switching of channels to other ports of entry and other trade routes.
  - Generation of intelligence packages for Customs. For this to be most effective, a Customs officer should be seconded to work within the Unit and act as a liaison point with Customs.
  - Greater co-operation and collaboration with enforcement agencies internationally, facilitated through the NWCUI. Customs could establish useful bilateral and multilateral co-operation with source and transit states to tackle the problems at source, as well as the interception at UK ports.