A woman in a police uniform, with a white shirt and dark trousers, is leaning over a large metal container. She is wearing white gloves and looking down at several large, light-colored ivory tusks inside the container. The tusks are arranged in a row, and some have markings on them. In the background, another person in a dark uniform is partially visible. The setting appears to be a warehouse or a storage area.

# **MORE THAN WORDS: ARE COMMITMENTS TO TACKLE ILLEGAL WILDLIFE TRADE BEING MET?**

**A REVIEW OF PROGRESS AGAINST  
COMMITMENTS MADE AT  
INTERGOVERNMENTAL CONFERENCES**



WORKING  
TOGETHER FOR  
NATURE'S  
RECOVERY



International Institute  
for Environment  
and Development



### About WWF

At WWF, we're fighting for your world. We're tackling the underlying causes that are driving nature's decline – particularly the food system and climate change. And we're working to ensure future generations have a world with thriving habitats and species.

### About IIED

IIED is a policy and action research organisation promoting sustainable development and linking local priorities to global challenges. We are based in London and work on five continents with some of the world's most vulnerable people to strengthen their voice in the decision-making arenas that affect them.

Published August 2019 by WWF-UK.

Any reproduction in full or in part of this publication must mention the title and credit WWF-UK as the copyright owner.

© 2019 WWF-UK. All rights reserved.

No photographs in this publication may be reproduced without prior authorisation.

For further information, please contact  
Paul De Ornellas, chief wildlife adviser at WWF:  
[PDeOrnellas@wwf.org.uk](mailto:PDeOrnellas@wwf.org.uk)

or

Dilys Roe, principal researcher, IIED  
[Dilys.Roe@iied.org](mailto:Dilys.Roe@iied.org)



# CONTENTS

## 1. INTRODUCTION 4

## 2. METHODOLOGY AND DATA HEALTH WARNINGS 6

## 3. OVERVIEW OF PROGRESS AGAINST COMMITMENTS 9

**3.1 Countries participating in the state-led conferences ahead of London 2018 10**

**3.2 Countries reporting on progress against commitments 12**

**3.3 Most and least reported pillars 12**

## 4. DETAILS OF PROGRESS AGAINST EACH PILLAR 13

**4.1 Eradicating the market for illegal wildlife products 14**

Tightening market controls 17

Collaborating along the trade chain 18

Engaging the private sector 18

Renouncing government use of at risk species 19

Inventorying and destroying seized illegal products 19

Raising public awareness 20

Understanding demand reduction and behaviour change 20

Other actions 21

**4.2 Building effective legal frameworks 21**

Treating wildlife crime as 'serious crime' 23

Strengthening countries' legal frameworks 24

Strengthening the judiciary 24

Tackling corruption and financial crime 25

**4.3 Strengthening law enforcement 26**

Investing in capacity building for law enforcement officials 30

Strengthening capacity for specialised investigations 30

Establishing national cross-agency coordination and collaboration 31

Strengthening regional and global enforcement network 31

Working with existing international agencies 32

Engaging the private sector 32

Strengthening the International Consortium on Combating Wildlife Crime (ICWC) 32

Other actions 32

**4.4 Sustainable livelihoods and economic development 32**

## 5. FUNDING FOR TACKLING IWT 36

Funding trends 2010-2016 37

IWT funding 2016-2018 39

Geographical distribution of funding 39

Conference pillars addressed 41

## 6. SUFFICIENCY OF ACTIONS - ARE INVESTMENTS IN TACKLING IWT PAYING OFF? 43

How do the countries of most concern correlate with the countries of most funding? 45

## 7. ROBUSTNESS OF EVIDENCE BASE 48

Progress against pillars evidence 49

Funding evidence 49

IWT trends evidence 50

## 8. CONCLUSIONS AND RECOMMENDATIONS 51

## ANNEX 56



# 1. INTRODUCTION

A ground pangolin in the Tswalu Kalahari Reserve, South Africa. Pangolins are the most heavily trafficked group of wild mammals. Despite protection across their range they are poached and illegally traded in Africa and Asia with African pangolins increasingly a target for Asian markets.

## In October 2018 the UK government hosted a high-level, inter-governmental conferences to tackle illegal wildlife trade (IWT).

The London Conference 2018 was the fourth in a series of state-led conferences on IWT, the first held in London in 2014, followed by Kasane (Botswana) in 2015 and Hanoi (Vietnam) in 2016. The first London Conference was convened in response to the sudden escalation in poaching of high value mammal species, particularly elephants, rhinos and big cats. It built on a meeting convened by the Prince of Wales in May 2013 between the UK government with other governments, NGOs and experts at Clarence House. The Clarence House conference, which included representatives from over 20 governments highlighted the need to move IWT from a niche environmental issue to one which was recognised by governments at the highest levels, as an essential part of ensuring national and international security and stability. Critically, the Clarence House conference recognised the role of government in tackling three key challenges associated with IWT:

- 1 Law enforcement and criminal justice: including cross border collaboration and international coordination
- 2 Demand reduction – tailored to local circumstances and audiences but with best practices shared internationally
- 3 Sustainable alternative livelihoods – building a local stake in conservation initiatives and linking conservation with poverty alleviation

At the end of the Clarence House conference, the UK government committed to host a meeting “aimed at the highest levels of Government, and, to agree on an ambitious agenda of effective action to tackle the illegal wildlife trade”. And hence the London Conference 2014 was born.

The London Conference 2014 picked up on the three themes that emerged from the Clarence House conference, expanding the first Clarence House theme to make a fourth – Ensuring Effective Legal Frameworks and Deterrents. The Kasane and Hanoi Conferences retained these four key pillars of actions and during the three conferences various commitments for action were made under each of them. The outcome statement from the 2018 London Conference did not include specific commitments under each of the four pillars, but it did recognise the importance of some key actions and affirmed the participants’ determination to implement the commitments already made in the previous declarations. The commitments/recommended actions made under each of the four pillars are summarised in Annex 1.

In the run up to the London Conference 2018, WWF-UK commissioned the International Institute for Environment and Development (IIED) to conduct a review of progress against the four pillars of the state-led conferences. The review was intended to address the following questions:

- 1 What are some of the major achievements at national, regional and international levels and what are some of the major gaps – with reference to the four key pillars?
- 2 Which countries appear to be making good progress and which appear to be making little or no progress in tackling IWT – with reference to the four key pillars?
- 3 Is progress around four focal pillars equal or if not – against which pillars has the most and least progress been made?
- 4 Has funding for action around four focal pillars been sufficient and balanced?
- 5 How robust is the evidence upon which the assessments of progress have been made? What are the weaknesses and strengths in the evidence base?

This report presents the findings of that review. Section 2 describes the approach used to conduct the review. Sections 3 and 4 provide an analysis of progress against the commitments made at the IWT conferences in London 2014, Hanoi 2015 and Kasane 2016 (questions 1,2,3). Section 5 provides an analysis of funding allocated to IWT and its distribution geographically and between the four pillars (question 4). Section 6 explores the extent to which the funding allocated has been effective in reducing IWT (question 4). Section 7 discusses the nature of the evidence base on which the analysis is based (questions 5). Finally, Section 8 presents the overall conclusions of the review and some recommendations for future allocation of funds and for future efforts to monitor progress against the commitments.



## 2. METHODOLOGY AND DATA HEALTH WARNINGS

A local girl carries firewood near Virunga National Park, Democratic Republic of the Congo.



To answer questions 1-3 we developed an Excel based spreadsheet to capture reported progress on a country-by-country, pillar-by-pillar basis. We reviewed all the commitments under each pillar and tried to simplify and aggregate these where possible into a smaller number of themes. The themes used and the specific commitments to which they relate are summarised in Annex 1.

The analysis of progress against the commitments was based on existing reports of progress that have been made by countries in between the three conferences up to and including the report on progress one year after Hanoi. As noted above, there is no formal requirement for reporting on progress made against the conference commitments. Some countries who participated in the conferences have not reported at all, others have reported against some commitments but not others. The information available is thus extremely limited. It was beyond the scope of this assignment in terms of time and resources to conduct any new surveys or interviews to collect further first-hand reports of progress but this would be an essential first step to get a comprehensive assessment of action and progress on the ground including by governments, NGOs and private organisations. Progress reports reviewed included:

- The UK government's review of progress against commitments made in the London 2014 Declaration (released in run up to the Kasane conference): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415690/review-progress-kasane-conf-150317.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415690/review-progress-kasane-conf-150317.pdf)
- A briefing prepared by the Environmental Investigation Agency (EIA) in advance of the Kasane conference: <https://eia-international.org/report/high-profit-low-risk-reversing-the-wildlife-crime-equation>
- A briefing prepared by the Environmental Investigation Agency (EIA) in advance of the Hanoi conference: <https://eia-international.org/no-time-paper-promises-hanoi-wildlife-trade-meeting>
- A briefing prepared by the prepared by the Environmental Investigation Agency (EIA) in advance of London 2018 conference: <https://eia-international.org/report/all-eyes-on-london>
- A report prepared by the Vietnamese government which compiles government self-reports of progress in advance of the Hanoi conference: <http://iwthanoi.vn/documents2/>
- The World Wildlife Crime Report (2016) produced by the United Nations Office on Drugs and Crime: [https://www.unodc.org/documents/data-and-analysis/wildlife/World\\_Wildlife\\_Crime\\_Report\\_2016\\_final.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/World_Wildlife_Crime_Report_2016_final.pdf)
- A report prepared by the Vietnamese government which compiles government self-reports of progress a year on from the Hanoi conference: <http://iwthanoi.vn/one-year-report/>

- A report prepared by the EU Commission on the EU Action Plan against wildlife trafficking, reviewing one year after an overview of actions and initiatives taken by the EU Member States and the European Commission

We also included information from a research conducted as part of the thesis research for a student's Masters in Conservation Science (Imperial College, London) being co-supervised by the report authors. The thesis explored the extent to which national level legislation, policies and strategies in African elephant range states supports community engagement to tackle IWT.

To answer question 4, we constructed a similar country by country datasheet and first used a funding analysis compiled by the World Bank (Wright et al 2016) to record aggregate funding received by each country between 2010 and mid-2016. Much of the primary data included in the World Bank report is confidential and not publicly available. We weren't therefore able to re-use the original World Bank data, only the aggregated results of their survey. However we sought to add to this as far as possible by identifying 1) any projects funded between 2010 and 2016 that were not included in the World Bank analysis (for example projects in Latin American countries) and 2) new projects funded since the World Bank analysis. This was based on an interrogation of the Global Environment Fund (GEF) projects database; the UK IWT Challenge Fund summary of projects; the US Fish and Wildlife Service (USFWS) online summary of projects; email discussions with the US Agency for International Development (USAID) and European Union (EU) officials as well as internet searches. For each project we identified we recorded the country or region to which the funding was allocated, the amount of funding (converted to US dollars where necessary to allow for summing) and – where the information existed – which of the four pillars the identified projects addressed.

It should be stressed that our analysis of funding was based on data we could find and access – not on all data that exists. Our sample of donors and projects was only a small component of those covered in the World Bank analysis. Furthermore the data from different donors is produced in different formats and so not straightforward to aggregate in many cases. For example, the GEF, USFWS and IWT Challenge Fund provide funding data on a project by project basis and state the funding committed to each project. USAID, on the other hand, only provide details of aggregate annual spend on a country-by-country basis. So a project worth \$5 million may have been agreed in 2016 but the USAID data will only reflect the portion of the commitment that has been spent in 2016 not the full commitment. There is also a time-lag in making funding data available for some donors. For example, at the time of the analysis (July/August 2018) USFWS had released 2017 summaries for some but not all of their schemes, while the most recent data for USAID was their 2016 spend.

In summary the analysis of funding is based on the following information:

- World Bank analysis of donor funding for IWT 2010–2016 (Wright et al 2016) [<http://documents.worldbank.org/curated/en/695451479221164739/Analysis-of-international-funding-to-tackle-illegal-wildlife-trade>]
- GEF online projects database – projects funded since 2016 and/or in countries not covered by the World Bank analysis [<https://www.thegef.org/projects>]
- IWT Challenge Fund – online summary of projects funded since 2016 [<https://www.gov.uk/government/publications/illegal-wildlife-trade-challenge-fund-list-of-existing-projects>]
- USFWS – online project summaries from species and regional conservation funds for 2016 and 2017 for countries already covered in World Bank analysis and from 2010 for countries not covered [<https://www.fws.gov/international/grants-and-reporting/project-summaries.html>]
- USAID – country level data from 2016 fiscal year report (USAID 2017) [[https://www.usaid.gov/sites/default/files/documents/1865/USAID\\_FAB\\_FY2016\\_Annual\\_Report\\_FINAL.pdf](https://www.usaid.gov/sites/default/files/documents/1865/USAID_FAB_FY2016_Annual_Report_FINAL.pdf)]
- EU – any information found via web searches or email requests for projects funded since 2016
- African Elephant Fund – projects funded since 2016 as described on website [<http://www.africanelephantfund.org/page/i/summary-of-funded-projects>]

To provide insights as to whether the funding had been sufficient we tried to identify sources of information on poaching statistics so that we could explore any apparent correlation between amounts of funding received and trends in poaching. However this proved difficult to do since reliable, global poaching data on a country by country basis is hard to come by and generally not publicly available. For example under the Monitoring Illegal Killing of Elephants and other Endangered Species (MIKES) programme,

primary data is not publicly available, only aggregated trend data, as they appear in CITES report. We include insights from the latest MIKE reports in our narrative analysis but this is not sufficient to demonstrate any correlation. TRAFFIC have supported this study by pulling together an analysis of data from their seizures database and highlighting the source, transit and destination countries where the most seizures of parts from African elephants, African and Asian rhinos and pangolins, and tigers. Sabri Zain (pers comm) notes that the data is unreliable because it is taken from media reports which are biased to certain species and geographic areas – “the media focus is skewed in both the countries and species it focuses on”. The data therefore comes with a warning that “it is therefore not possible to assume from these data alone any trade trend conclusions. In addition to these biases, the ability and willingness of a country to make seizures is dependent on a number of factors, and countries do not all make seizures at the same rate. Therefore, just because a country makes a large number of seizures, it does not mean it is the country with the largest volume of illegal wildlife trade or that its efforts to curb illegal wildlife trade are effective. To add further complexity, the factors influencing seizure rate and reporting rate will vary over time. Due to these complexities, the use of seizures as a measure of illegal wildlife trade is unreliable and trends in the data may reflect changes in reporting rates or enforcement effort rather than trends in trade.” Nevertheless, and in the absence of any other data sources, the TRAFFIC data provides insights on seizures of a wider range of species than the rhinos and elephant reports which are available via CITES and may highlight countries where there may be problems (even if there are additional unrecorded seizures elsewhere).

To answer question 5 on the robustness of data we sought in our analysis to distinguish reported activities/progress from actual evidence of progress such as new legislation and we have reported on this. We have also provided an overview of the available data and its limitations as personal insights into evidence robustness.





### 3. OVERVIEW OF PROGRESS AGAINST COMMITMENTS PRIOR TO LONDON 2018



Singye Wangmo, tiger protector, who heads up a team of 30 rangers in Royal Manas National Park, Bhutan.



© PINPEP / WWF-UK

### 3.1 COUNTRIES PARTICIPATING IN THE STATE-LED CONFERENCES AHEAD OF LONDON 2018

41 countries participated in the London 2014 conference, 32 in Kasane 2015 and 42 in Hanoi 2016 (in addition, the European Union was represented as well as individual member countries at all three conferences). 23 countries participated in all three IWT conferences, 16 in two, and 14 in one conference<sup>1</sup>. Of those that have only participated in one conference, six countries (Brazil, Chad, Congo, Italy, Nepal and Rwanda) participated only in the London conference, one country (Belgium) participated only in the Kasane conference, and seven countries (Cambodia, Madagascar, Mongolia, Norway, Singapore, Swaziland and Sweden) first participated at the Hanoi conference.

Notable absences from the conferences include important<sup>2</sup> IWT source countries such as Equatorial Guinea and Nigeria, as well as significant IWT transit countries such as Qatar and IWT transit and destination countries such as India, Hong Kong SAR, and Thailand. It is also striking that fewer countries from Latin America have participated compared to other regions. Only Colombia and Mexico have participated in the London and Hanoi conferences, and Brazil has participated in just the London conference. Figure 1 summarises attendance by countries at each of the conferences prior to 2018.

The London Conference 2018, had a higher level of participation than the previous conferences, with 65 countries signing up to the conference declaration. It also included some of the countries noted above as being significant along the IWT value chain but previously absent including Nigeria, Qatar, India and Thailand; and a greater number of Latin American countries including Bolivia, Colombia, Costa Rica, Mexico, Nicaragua, Panama and Peru.

<sup>1</sup> Again, this does not include the EU, whose representatives have participated in all three of the IWT conferences.

<sup>2</sup> "Important" or "significant" in this context is based on countries identified via the TRAFFIC seizures databases as having high numbers of seizures of African elephants, rhinos, pangolins or tigers (see Section 6 which presents this data).



**Figure 1:** Countries participating in the London 2014, Kasane 2015, and Hanoi 2016 IWT Conferences

Country	Participants		
	London	Kasane	Hanoi
<b>North America</b>			
Canada			
USA			
<b>Latin America</b>			
Brazil			
Colombia			
Mexico			
<b>Oceania and the Pacific</b>			
Australia			
<b>Europe and the Middle East</b>			
Austria			
Belgium			
France			
Germany			
Italy			
Netherlands			
Norway			
Sweden			
Switzerland			
UAE			
UK			

Country	Participants		
	London	Kasane	Hanoi
<b>Africa</b>			
Angola			
Botswana			
Cameroon			
Chad			
DRC			
Congo			
Ethiopia			
Gabon			
Kenya			
Madagascar			
Malawi			
Mozambique			
Namibia			
Rwanda			
South Africa			
Swaziland			
Tanzania			
Togo			
Uganda			
Zambia			
Zimbabwe			

Country	Participants		
	London	Kasane	Hanoi
<b>Asia</b>			
Bangladesh			
Cambodia			
China			
Indonesia			
Japan			
Laos			
Mongolia			
Malaysia			
Myanmar			
Nepal			
Philippines			
Russia			
Singapore			
Sri Lanka			
Vietnam			

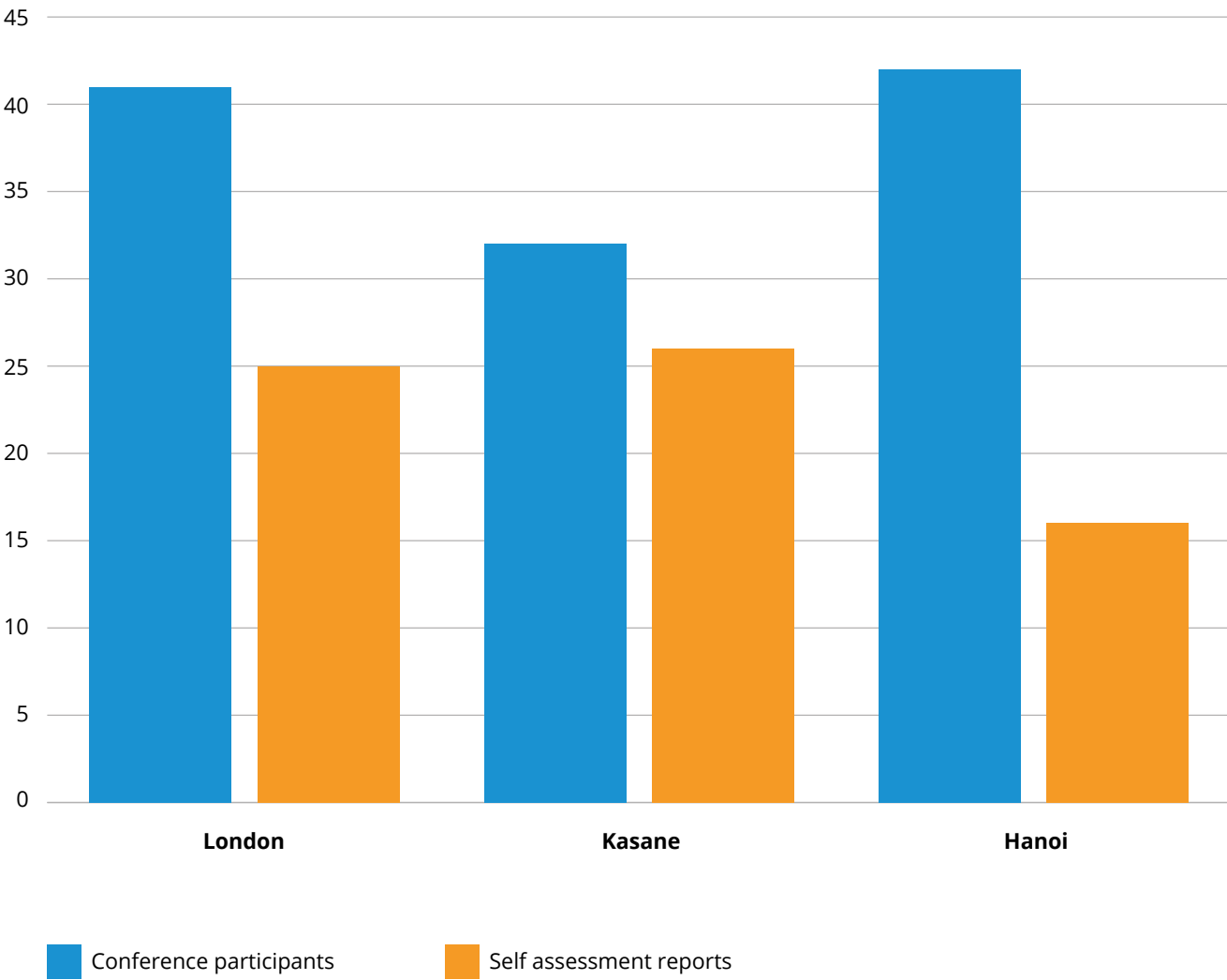
3.2 COUNTRIES REPORTING ON PROGRESS AGAINST COMMITMENTS

Not all the countries that participated in the conferences have reported against the commitments made. 23 countries reported on progress since London 2014 prior to the Kasane conference, 16 prior to the Hanoi conference and 14 one year after Hanoi. Only ten countries have consistently reported (i.e. in all three cases): Australia, Canada, China, Indonesia, France, Germany, Malawi, the UK, USA and Vietnam. Figure 2 shows the number of countries attending each conference compared to the number that have reported on progress since the conference.

3.3 MOST AND LEAST REPORTED PILLARS

Generally, more action was reported on the two pillars of strengthening law enforcement and building effective legal frameworks than on the two pillars of eradicating the market for illegal wildlife products and supporting sustainable livelihoods and economic development. Furthermore, the actions carried out under the law enforcement and legal frameworks pillars covered a much wide range of commitments than those under the demand reduction or livelihoods pillars. It is hard to know whether this difference is due to a bias in reporting or key differences in implementation of the four pillars. The lack of action on supporting sustainable livelihoods and economic development was acknowledged as obvious gap in implementation in all the progress reports reviewed.

Figure 2: Number of countries participating at the state-led conferences and number of countries reporting on progress.





## 4. DETAILS OF PROGRESS AGAINST EACH PILLAR

Farmer working on her farm.  
Bomet County, Mara River  
Upper Catchment, Kenya.



There were thirteen commitments in total from the London, Kasane and Hanoi IWT conferences related to eradicating the market for illegal wildlife products. We have grouped these commitments under seven broad themes:

- 1 Tightening market controls
- 2 Collaborating along the trade chain
- 3 Engaging the private sector
- 4 Renouncing government use of at risk species
- 5 Inventorying and destroying seized illegal products
- 6 Raising public awareness
- 7 Understanding the science of demand reduction and behaviour change

Most significant progress appears to have been made in closing domestic markets for illegal ivory trade – specifically in China, the UK and the US. However, parallel legal domestic markets persist for other at-risk species such as tiger and pangolin (EIA 2015; 2016). The progress report on year after Hanoi underlines that continued existence of

Much of the reports of progress are focused on the market for elephant ivory and somewhat also on rhino horn. EIA (2016) stresses that other species such as pangolin and tiger are not getting the attention needed. Furthermore, it seems that at-risk birds, reptiles and plants species appear largely forgotten in reports of progress. It is hard to know whether this is a problem with reporting or a lack of implementation focus on these species.

We did not find any reports of progress for the London commitment to “minimise speculation in endangered wildlife products by opposing the use of misleading, exaggerated or inaccurate information, where this could stimulate poaching, trafficking or demand.” As such this is not included in the following narrative or Tables 1-4.

**Tables 1-4. Country action associated with the pillar of eradicating the market for illegal wildlife trade for countries that have participated in London 2014, Kasane 2015 or Hanoi 2016 Conferences.** Note the blue cells indicate when a country is a participant of an IWT conference, and the orange cells indicate action(s) Where there is no action (i.e. no orange cells) this may be due to inaction, but more likely a lack of reporting.

**Table 1: Europe**[illegible]



Table 2: Africa

Country	Participants			Eradicating the market for illegal wildlife						
	London	Kasane	Hanoi	Tightening market controls	Inventorying and destroying seized illegal products	Renouncing government use of at risk species	Engaging the private sector	Understanding the science of demand reduction and behaviour change	Collaborating along the trade chain	Raising public awareness
<b>Africa</b>										
Angola										
Botswana										
Cameroon										
Chad										
Congo										
DRC										
Ethiopia										
Gabon										
Kenya										
Madagascar										
Malawi										
Mozambique										
Namibia										
Rwanda										
South Africa										
Swaziland										
Tanzania										
Togo										
Uganda										
Zambia										
Zimbabwe										



**Table 3: Asia**[illegible]**Table 4: Americas, Oceania and Pacific**[illegible]



### Tightening market controls

Countries participating in the 2014 London IWT conference committed to “*support, and where appropriate undertake, effectively targeted actions to eradicate demand and supply for illegal wildlife products*”. At the Kasane conference in 2015 this commitment was echoed with countries committing “*to tighten existing international controls on the import and export of illegal wildlife products, particularly ivory*”. In this review, we have found more information on progress related to these two commitments than for any others under this pillar. Of note, is that this information largely details progress towards eradicating the market for elephant ivory, and there is limited information on eradicating the illegal trade in products associated with other species.

African countries that have reported progress towards eradicating the elephant ivory trade include Botswana, Chad, Ethiopia, Gabon, Kenya, Malawi and Tanzania. Indeed, Botswana, Chad, Ethiopia, Gabon and Tanzania have launched the Elephant Protection Initiative (EPI) with 18-member countries<sup>3</sup> and an NGO coalition. The EPI calls for the closure of domestic ivory markets, and the development and endorsement of the African Rhino Action Plan (Vietnam Ministry of Agriculture and Rural Development 2016). The founding countries observe the current moratorium on ivory trade agreed to by CITES parties and have committed to a further moratorium on trade in elephant ivory by taking ivory out of economic use for ten years (UK Government 2015).

In 2016 the EU agreed on an Action Plan against Wildlife Trafficking containing relevant measures for reducing the demand and supply of illegal wildlife products (Vietnam Ministry of Agriculture and Rural Development 2016). The European Commission, in cooperation with member states, is reportedly developing guidelines related to EU law which will suspend the re-export of raw ivory from the EU and tighten the control over other legal transactions involving ivory (EU 2017). EU members states that currently restrict the re-export of raw ivory include Belgium, Bulgaria, Czech Republic, France, Germany, Portugal, Slovakia Sweden and the UK. For example, Belgium – a key transit country of elephant ivory – reports that since 2015 CITES documents (certificates and re-export permits) are issued only for marked ivory (EU 2017). The UK does not issue export and re-export documents for raw ivory and have announced plans to take further measures to restrict the sale of worked ivory through the UK Ivory Bill (EU 2017).

In 2016, the United States President Obama and President of China, Xi Jinping, jointly agreed to enact nearly complete bans on ivory import and export, and to take steps to halt the domestic commercial trade of ivory (Vietnam Ministry of Agriculture and Rural Development 2016). In July 2016, a near-total ban on the domestic commercial trade in ivory came into effect in the US and a number of states have additionally adopted ivory bans – this includes three states with the largest ivory markets in the US – New York, California and Hawaii (EIA 2016).

Progress reports suggest that ivory management measures in China continue to improve – for example, in March 2016, China issued a ban on imports of all ivory and ivory products and souvenirs from hunting elephants until 31 December 2019 (Vietnam Ministry of Agriculture and Rural Development 2016). In December 2016, China went much further proclaiming a notification to phase out domestic elephant ivory trade by the end of 2017. Detailed arrangements to stop elephant ivory trade were given in a notification by State Forestry Administration on 20 March 2017 – including requirements for 67 operators to stop processing and marketing ivory and to have their licences deregistered or amended at the local Industry and Commerce Administration department (Vietnam Ministry of Agriculture and Rural Development 2018).

While China appears to be acting on ivory, there continues to be issues with other illegal wildlife products that are often traded on legal markets. Examples include (EIA 2016):

- Medicines containing leopard bone are widely available in China despite a ban in 2006 on the purchase of leopard bone. The issue is with existing laws and policies which permit medicine producers to continue using existing stocks, thereby enabling laundering.
- Existing laws and policies allow legal commercial trade in pangolin scales for use by designated hospitals and licences are also issued to 209 companies to produce products that contain pangolin. EIA suggest that the origin of these scales is likely to be illegal, as the amount available far outweighs the productive capacity of China's wild or captive pangolin populations and legal imports.
- A legal trade of skins from captive tigers is permitted in China and while there was a ban enacted in 1993 on the use of tiger bone, companies are producing and openly selling tonic wines marketed as containing tiger bones. In 2005 a government-issued notification contradicts the 1993 ban by suggesting that use of captive-bred tiger bone for medicinal purposes may be legal.

<sup>3</sup> Angola, Botswana, Chad, Republic of Congo, Cote D'Ivoire, Ethiopia, Gabon, The Gambia, Guinea, Kenya, Liberia, Malawi, Mali, Sierra Leone, Somalia, South Sudan, Tanzania and Uganda

A key issue with the legal framework in China is that while the Constitution clearly stipulates wildlife protection, the Law of the People's Republic of China on the Protection of Wildlife (1989) allows for the utilisation and sale of wildlife products. This includes wildlife products from captive-bred species including species at risk of extinction. EIA (2015) claims that China's legal system of wildlife utilisation stimulates demand for wildlife products such as tiger skins and pangolins scales and creates opportunities for laundering of illegal products.

Captive tiger farming also takes place in Laos, South Africa, Thailand and Vietnam. Laos has declared its intention to phase out all tiger farms (EIA 2016), although there are no reports of progress on this issue. Notably, EIA (2015) expresses concern about the growing trade in tiger and associated parts and products from South Africa citing a report by TRAFFIC and WildCru from July 2015 – in particular they highlight the concern that tiger bones from South Africa may be laundered as lion bones using CITES Appendix II permits.

At the Hanoi Conference countries underlined that “*measures implemented to address illegal trade should not negatively impact upon legal trade in wildlife*”. Crucially, it appears that legal markets for some products could be negatively impacting and encouraging illegal trade – i.e. there appears to be outstanding issues where parallel legal markets offer opportunities for illegally sourced wildlife products to enter markets. Although due to limited reporting, it is not clear how widespread this issue is globally. An example includes Malawi, where there is commitment to implementing a moratorium on domestic ivory trade, but EIA (2016) note that the legal domestic trade in hippo ivory presents enforcement challenges due to its similarity to elephant ivory (especially in worked forms) (EIA 2016).

A relevant commitment to support the legal trade in wildlife products comes from the London Conference – “*allow trade in legally acquired endangered wildlife products to implement measures, including labelling and wider traceability measures, to ensure that this trade does not allow any illegal wildlife products to enter these markets.*” We found few reports of action on this issue of improving labelling and traceability. Switzerland have suggested that they are taking a leading role in improving traceability methods of legally sourced wildlife products – though there is no detail available on what these improvements involve (Vietnam Ministry of Agriculture and Rural Development 2016). The United Arab Emirates have reported that they are developing an e-permitting system for CITES certificates (Vietnam Ministry of Agriculture and Rural Development 2016). And, in Vietnam, the CITES Management Authority have reportedly helped with the development of circulars on guidelines for forest product management and traceability (Vietnam Ministry of Agriculture and Rural Development 2018). A country that appears to have advanced systems of traceability is Canada which uses tags, plugs and DNA

sampling for protected species such as polar bear, lake sturgeon, narwhal and certain reptiles (Vietnam Ministry of Agriculture and Rural Development 2016).

### **Collaborating along the trade chain**

We found few reported instances of government collaboration across the illegal wildlife trade chain specifically related to eradicating demand (we found more instances in relation to law enforcement, see section 4.3). At the Kasane Conference, countries committed to “*strengthen, and if necessary establish, partnerships among source, transit and destination countries to combat the illegal wildlife trade along its entire chain*”. The few instances we found typically related to activities between China and African countries such as Kenya, Malawi and Tanzania – in the latter two cases MoUs have reportedly been developed to improve bilateral cooperation (Vietnam Ministry of Agriculture and Rural Development 2018).

### **Engaging the private sector**

At the London Conference 2014, a commitment was made to engage the private sector to take measures “*to source legally any wildlife products used within their sectors; and... to adopt zero tolerance policies on corporate gifting or accepting of species threatened with extinction or products made from them*”. The commitment was bolstered at the Kasane Conference with a call to strengthen partnerships with business. So far, attention appears to have focused on e-commerce and some health-related businesses.

Efforts to tackle IWT on the web have been reported by China, India, Japan, and the US. For example, in October 2014 nine internet enterprises in China – including Alibaba and Tencent – launched “Please say no to illegal wildlife and their products”, committing the enterprises to not offer publicity and trading services for illegal wildlife products (UK Government 2015). In May 2016, the Wildlife Crime Control Bureau (WCCB) in India met representatives of major e-commerce companies who agreed to alert WCCB about attempts to post wildlife products on their websites. Amazon India have reportedly removed 296 items in the ‘animal specimen’ category and 104 items under the ‘snares or traps’ category (EIA 2016).

In Vietnam, efforts to reach out to the health sector include workshops with leading traditional medicine practitioners to curb the use of illegal wildlife products (EIA 2016), and workshops for business people in central cities such as Ha Noi and Ho Chi Minh City regarding the myths of medicinal value of rhino horns, and advocating for abandoning the practice of gifting rhino horns among business people (Vietnam Ministry of Agriculture and Rural Development 2016). Pangolin scales have also been removed from the list of medicines covered by health insurance (EIA 2016). In China, the New Era Health Group in 2015 became the first state-owned Chinese company to include in the company's formal code of conduct a zero-tolerance policy towards the use and gifting of illegal and endangered wildlife products (EIA 2016).



### Renouncing government use of at risk species

We found very few examples in the reports of progress related to renouncing the use of illegal wildlife products by government and the public sector. Ethiopia reported having established guidelines for government and business institutions regarding gifts and other use and consumption of protected wildlife (Vietnam Ministry of Agriculture and Rural Development 2016), but EIA reported that Nepal had backtracked on prohibitions to use wildlife as diplomatic gifts (EIA 2016). And in China, despite the Standing Committee of China's National People's Congress passing an interpretation of Criminal Law to stipulate that the consumption of 420 rare wild species would result in a jail term, EIA (2015) note the case of police consuming giant salamander at a banquet, claiming exemption as the salamander were captive raised.

### Inventorying and destroying seized illegal products

The London Conference 2014 included a commitment to destroy seized illegal wildlife trade products. Most of the progress made against this has been in terms of ivory. Table 5 shows countries that have destroyed ivory products, conducted (or committed to conducting) an inventory of ivory seizures and undertaken DNA analysis of ivory seizures. In total, 19 countries have reported destroying seized ivory, ten countries have reported conducting (or committing to conducting) an inventory process of ivory

seizures, and five countries have reported undertaking (or committed to undertaking) DNA analysis of ivory seizures. It is not always clear whether reports of destroying seized ivory represent the full national stockpile, or just part of the stockpile. The same applies for inventory processes – for example EIA reported that the Uganda Wildlife Authority (UWA) had conducted a full inventory of its ivory stockpile, developed an electronic inventory database and secured stockpiles with CCTV surveillance. However, this does not include stockpiles held by police and the Uganda Revenue Authority (URA) (EIA 2016).

There appear to be issues with securing seized ivory stockpiles with incidences of theft reported in Botswana and Tanzania (EIA 2016). And, crucially not many countries reported undertaking DNA analysis of large-scale ivory seizures ( $\geq 500\text{kg}$ ). EIA (2016) note that this is a key issue in Tanzania where DNA analysis conducted on 28 large-scale ivory seizures outside Tanzania (between 1996 and 2014) indicates that Tanzania is one of the main sources of ivory (EIA 2016).

One of the only countries that have submitted detailed reports of destroying illegal wildlife products other than ivory and rhino horn is Indonesia. This includes 5 tonnes of pangolins, 10,000kg of blue shark fin, 3,286kg of great hammerhead fin, 1,440kg manta ray parts, 13 pieces

**Table 5.** Countries that have reported destroying, inventorying or DNA analysing seized ivory

Region	Destroyed seized ivory	Conducted (or committed to conducting) an inventory process of ivory seizures	Undertaken (or committed to undertaking) DNA analysis of ivory seizures
Africa	Cameroon Gabon Kenya Malawi Mozambique	Botswana Ethiopia Malawi Mozambique Tanzania Uganda Zambia	Ethiopia Kenya Mozambique Uganda
Asia	China Hong Kong Japan India Indonesia Laos Philippines Thailand Vietnam	Nepal Vietnam	Malaysia
North America	Canada USA	USA	
Europe	Czech Republic France Slovakia		

helmeted hornbill beak, and several Sumatran tiger specimens (Vietnam Ministry of Agriculture and Rural Development 2016).

UNODC (2016) suggest that the effective and universal implementation of international standards for the storage, stockpiling, and disposal of protected wildlife products and contraband is essential. They also highlight that currently there can be logistical problems associated with disposing of large illegal wildlife shipments and that this can provide disincentives for enforcement – i.e. insufficient facilities to store or dispose of materials means customs authorities have little capacity to seize more.

### Raising public awareness

23 countries reported supporting national public awareness raising campaigns – including Belgium, China, Colombia, Croatia, Ethiopia, Germany, Hungary, Indonesia, Italy, Japan, Latvia, Malawi, Mexico, Myanmar, Namibia, Singapore, South Africa, Sri Lanka, Sweden, Thailand, Uganda, UAE and Vietnam. Examples include displaying posters at national points of entry and exit, as reported by Namibia, Malawi, Myanmar, Thailand and Uganda. Other efforts include in Thailand distributing awareness-raising information about illegal ivory trade in key tourist attractions and trade hotspots in English, Thai and Mandarin (EIA 2016). And, in Malawi since 2014 the Department for Wildlife and National Parks has collaborated with NGOs to run the ‘Stop Wildlife Crime’ campaign – including the release of a film featuring President Mutharika and 14 international envoys calling on viewers to reject ivory and report suspicious activity (EIA 2016 and Vietnam Ministry of Agriculture and Rural Development 2016).

The Hanoi Declaration includes encouragement to countries to undertake targeted national efforts for raising public awareness taking “...into careful consideration regional issues around species, consumer profiles and market dynamics, including speculation and traditional use”<sup>4</sup>. Examples that have been reported include training for members of parliament in Ethiopia on relevant IWT commitments, outreach tours for traders in Togo involved in selling wild animal and plant specimens (Vietnam Ministry of Agriculture and Rural Development 2016), workshops with Chinese nationals living in Mozambique and South Africa (EIA 2016), and a text message campaign by the Chinese government to nationals travelling to selected African countries to warn them not to buy illegal wildlife products (EIA 2016).

The progress reports stress that while there are examples of countries researching and targeting specific cultural and traditional values in behaviour change campaigns, there are continuing challenges in reaching individual consumers.

In addition, the reports underline that there is not yet much evidence of the impact of the strategies that have been used to date on demand reduction nor is their evidence of how different public awareness and behaviour change strategies can complement one another (UK Government 2015; Vietnam Ministry of Agriculture and Rural Development 2016). We found that only one country cited data for the effectiveness of their public awareness campaign strategy: in their progress report prior to Hanoi, Vietnam highlighted that an evaluation of their Rhino Horn Demand Reduction Campaign noted a decrease of 51% of the population who believed that rhino horn has medicinal value, and an increase in the percentage of the population who know that buying and selling rhino horn is illegal of from 74% to 88% (Vietnam Ministry of Agriculture and Rural Development 2016).

EIA (2016) suggest that careful profiling of key consumer groups and identification of their motivations is vital to the success of demand-reduction campaigns. They illustrate this point with the example of government and NGO campaigns in China which have typically targeted the traditional medicine community even though research indicates significant current consumers as the military, business and political elites (EIA 2016). Finally, another important criticism of current public awareness raising efforts is that they focus on few species – typically elephant and rhino – and rely heavily on NGOs (EIA 2016, 2018).

### Understanding demand reduction and behaviour change

Related to raising public awareness, a commitment at the Kasane conference in 2015 requested countries to “conduct and/or support research to improve understanding of market drivers, including monitoring the effectiveness of demand reduction strategies and collating a portfolio of demand reduction good practice”. As suggested by the previous section, this appears to be a key gap in implementation currently and we found reports of progress related to this commitment from just six countries – China, Germany, Indonesia, South Africa, the UK and Vietnam.

Reported activities include holding workshops in China (UK Government 2015) and Vietnam, developing communication strategies in Indonesia, South Africa and Vietnam and undertaking research on understanding drivers of demand and demand reduction in Indonesia and South Africa (Vietnam Ministry of Agriculture and Rural Development 2018). The UK government is also reportedly undertaking research with partners to identify insights into effective demand reduction and behaviour change strategies (Vietnam Ministry of Agriculture and Rural Development 2016) and the German government has in collaboration with TRAFFIC supported the development of an online toolkit and community of practice on demand reduction<sup>5</sup> (Vietnam Ministry of Agriculture and Rural Development 2018).

<sup>4</sup> <http://iwthanoi.vn/wp-content/themes/cites/template/statement/Hanoi%20Statement%20on%20Illegal%20Wildlife%20Trade.pdf>

<sup>5</sup> See: <http://www.changewildlifeconsumers.org>

### Other actions

Other notable actions by countries that do not specifically fit under the IWT commitments include a request from the Wildlife Crime Control Bureau in India that authorities prohibit the sharing of wildlife trophies on social media as a condition in hunting permits (EIA 2016).

## 4.2 BUILDING EFFECTIVE LEGAL FRAMEWORKS

There were 11 commitments in total from the London, Kasane and Hanoi IWT conferences related to building effective legal frameworks. We have grouped these commitments under four broad themes:

- 1 Treating wildlife crime as a “serious crime”
- 2 Strengthening countries’ legal frameworks
- 3 Strengthening the judiciary
- 4 Tackling corruption and financial crime

Tables 6-9 summarise, on a regional basis, which countries have reported against which themes.

Following the Hanoi conference in 2016, UNODC stated that a continued challenge is the burden of weak legislative frameworks in countries that often have inadequate and non-dissuasive penalties (Vietnam Ministry of Agriculture and Rural Development 2018). While we show in this section that there has been some reported progress on treating wildlife crime as a ‘serious crime’, it is still unclear how many countries have integrated this into their legislative frameworks. Important legislative loopholes persist in key countries– for example: possession is not always treated as a wildlife crime, non-native species (including CITES listed species) can remain unprotected, or protected species can remain undefined. There appear to also be additional challenges associated

with implementation such as inconsistent and lenient sentencing, the prosecution of low levels criminals (rather than key players in the illegal trade chain), and slow judicial processes.

All the progress reports note that, despite pledges, corruption and money-laundering have not received sufficient attention. The reports underline that many countries are yet to ensure that their domestic legislation recognise the full range of financial crimes associated with the illegal wildlife trade (UK Government 2015; Vietnam Ministry of Agriculture and Rural Development 2016; Vietnam Ministry of Agriculture and Rural Development 2018). Indeed, we found few reports of progress against commitments at London and Kasane to: adopt legislation criminalising corruption and bribery; adopt a zero tolerance policy on corruption; to work with the Financial Action Task Force, its FATF-Style Regional Bodies, and other multilateral organisations dealing with law enforcement and financial crimes; to review and amend national legislation as necessary and appropriate so that offences connected to the illegal wildlife trade are treated as “predicate offences”; and to ensure that the relevant authorities engaged in law enforcement, have the resources, knowledge and capacity effectively to investigate and prosecute financial crimes.

**Tables 6-9. Country action associated with the pillar of building effective frameworks for countries that have participated in the London 2014, Kasane 2015 or Hanoi 2016 conferences.** Note the blue cells indicate when a country is a participant of an IWT conference, and the orange cells indicate action(s). Where there is no action (ie no orange cells) this may be due to inaction, but more likely a lack of reporting.

**Table 6:** Europe

Country	Participants			Building effective legal frameworks				
	London	Kasane	Hanoi	Treating wildlife crime as a “serious crime”	Tackle corruption	Tackle financial crime	Strengthening countries’ legal frameworks	Strengthening the judiciary
<b>Europe</b>								
Austria								
Belgium								
France								
Germany								
Italy								
Netherlands								
Norway								
Sweden								
Switzerland								
UK								



Table 7: Africa

Country	Participants			Building effective legal frameworks				
	London	Kasane	Hanoi	Treating wildlife crime as a "serious crime"	Tackle corruption	Tackle financial crime	Strengthening countries' legal frameworks	Strengthening the judiciary
<b>Africa</b>								
Angola								
Botswana								
Cameroon								
Chad								
Congo								
DRC								
Ethiopia								
Gabon								
Kenya								
Madagascar								
Malawi								
Mozambique								
Namibia								
Rwanda								
South Africa								
Swaziland								
Tanzania								
Togo								
Uganda								
Zambia								
Zimbabwe								

Table 8: Asia

Country	Participants			Building effective legal frameworks				
	London	Kasane	Hanoi	Treating wildlife crime as a "serious crime"	Tackle corruption	Tackle financial crime	Strengthening countries' legal frameworks	Strengthening the judiciary
<b>Asia</b>								
Bangladesh								
Cambodia								
China								
Indonesia								
Japan								
Laos								
Malaysia								
Mongolia								
Myanmar								
Nepal								
Philippines								
Russia								
Singapore								
Sri Lanka								
UAE								
Vietnam								

**Table 9:** Americas, Oceania and Pacific

Country	Participants			Building effective legal frameworks				
	London	Kasane	Hanoi	Treating wildlife crime as a "serious crime"	Tackle corruption	Tackle financial crime	Strengthening countries' legal frameworks	Strengthening the judiciary
<b>North America</b>								
Canada								
USA								
<b>Central and Latin America</b>								
Brazil								
Colombia								
Mexico								
<b>Oceania and the Pacific</b>								
Australia								

### Treating wildlife crime as 'serious crime'

As part of the 2014 London Declaration, signatories committed to adopting and amending legislation to treat poaching, wildlife trafficking and related crimes as 'serious crime', a commitment which was re-emphasised in the 2016 Hanoi Statement. The Convention against Transnational Organised Crime (UNTOC) stipulates that 'serious crime' warrants a minimum penalty of four years imprisonment. In 2015, UNODC (2016) found that few countries consider CITES-related violations as 'serious crime'. Of the 131 CITES parties for which data is available, they found that just 26% had regulations specifying more than four years imprisonment (UNDOC 2016).

A key diplomatic achievement for elevating wildlife crime as 'serious crime' status was the passing of the UN General Assembly Resolution 69/314 in July 2015. Gabon, Germany and more than 80 other nations worked together to secure, and in some cases, co-sponsor the resolution which calls on UN member states to make trafficking in protected species involving organised criminal groups as 'serious crime', as per UNTOC (Vietnam Ministry of Agriculture and Rural Development 2016).

Specific countries that have reported progress in amending their current legislation in accordance with UNTOC include Canada, Japan, Kenya, Malawi, Mozambique, Namibia, and Vietnam. For example, in Malawi, The National Parks and Wildlife amendment bill was passed by parliament in November 2016 and adopted into law by the President in January 2017. The amended act provides for stricter penalties of up to 30 years imprisonment for offences involving specified protected species, with no option of a fine (ROP – Hanoi). In Vietnam, the National Assembly officially approved the Penal Code of 2017 which raises maximum penalties for crime related to wildlife trade to US\$50,000 or 15 years imprisonment for an individual, and up to US\$75,000 and a business ban for 1 to 3 years for an enterprise (ROP – Hanoi).

Progress can, however, create unanticipated impacts. Kenya's new Wildlife Conservation and Management Act (WCMA) came into effect in January 2014 and prescribes an increase in penalties for wildlife offences in line with UNTOC. However, EIA point to reports that the high minimum sentences have led to a rise in the number of 'not-guilty' pleas and trials, resulting in increased burdens on judges, prosecutors and investigators (EIA 2016). The application of the new law appears to be unclear as exemplified by the overturning of Faisal Mohammed's 20-year sentence for ivory trafficking. When overturning the case, the judge noted that despite the WCMA, the Kenyan Constitution stipulates a penalty of 1 million Kenya Shillings and a one-year jail sentence for ivory trafficking (Bwana 2018).

Other countries that have reported reviewing their legislation include Cameroon, Indonesia countries of the European Union (EU) and Hong Kong. In the EU, criminal sanctions applicable to wildlife trafficking vary and some member states have a maximum sanction of imprisonment for less than one year – such divergence prevents cross border investigations and judicial cooperation, including the use of the European Arrest Warrant (EIA 2015). Reviewing and amending legislation to ensure member states recognise wildlife crime as 'serious crime' is a key action within the EU's Action Plan against Wildlife Trafficking (EU 2016).

Significant legislation discrepancies are also reported between mainland China and Hong Kong, and between Tanzania and Zanzibar. Legislation in China prescribes sentences of up to life imprisonment for wildlife trafficking, while Hong Kong has a maximum sentence of two years for a similar offence (EIA 2015, 2016). In Tanzania, while the Wildlife Conservation Act of 2009 provides for a minimum of five years imprisonment for illegal wildlife trade, the equivalent legislation in the autonomous region of Zanzibar stipulates a maximum penalty of six months imprisonment or a fine of approximately US\$185. The law in Zanzibar



also only applies to native species and so excludes many species in illegal trade (notably elephants and rhinos). This inconsistency potentially means that Zanzibar acts as a legal loophole in the Tanzanian legislation (EIA 2015, 2016).

### **Strengthening countries' legislative frameworks to deter IWT**

The London Declaration 2014 calls on countries to commit to strengthening legislative frameworks to ensure there are effective deterrents to IWT. Following the 2014 London Declaration, Tanzania, Botswana, Ethiopia all reported that their wildlife legislation was under review. Tanzania and Ethiopia reported the same in the lead up to the Hanoi Conference (UK Government 2015; and Vietnam Ministry of Agriculture and Rural Development 2016). EIA (2015; 2016) noted that amendments to Tanzania's Wildlife Conservation Act of 2009 have been pending submission to parliament since 2013.

One way that countries can strengthen their existing legislative frameworks is through ensuring that they comply with CITES provisions. Mozambique has enacted CITES-specific legislation (EIA 2016) and other countries have reported that they are reviewing and incorporating CITES provisions into national legislation include Bulgaria, Gabon, Malawi, Nepal, Uganda, Sri Lanka, and Zambia (UK Government 2015; EIA 2016; Vietnam Ministry of Agriculture and Rural Development 2016). In Bulgaria, amendments to national CITES implementing legislation aim to increase the control of trade in CITES listed species and to strengthen the cooperation between the main institutions involved (EU 2017).

A crucial issue for strengthening national legal frameworks is to close loopholes such as that between Tanzania and Zanzibar described above. Other examples include, despite amendments to wildlife law in China, the government does not criminalise possession of illegal wildlife products (EIA 2016). Similarly, Laos PDR's Wildlife and Aquatic Law of 2007 does not treat possession as an offence, and the possession and trade of second and subsequent generation of captive species is authorised, which presents opportunities for laundering (EIA 2015). In Thailand, to tackle rhino horn trafficking enforcement personnel must use other legislation such as customs law – although a positive move here is that an amendment to the law has eliminated a loophole created by the requirement for a representative of the destination country to be present upon inspection of suspicious cargo in transit (EIA 2016).

In other cases, key wildlife crime legislation may create loopholes where the list of protected species is undefined. In Togo, for example, the legal status of *Kosso* (African rosewood) is ambiguous as the government has not issued a list of species protected by the Forest Code (2008) (UNODC 2016). And, while Mozambique's Conservation Law (2014) is progressive by treating wildlife crime as 'serious crime', the species protected by the law remain unclear and penalties seem to apply only to poaching offences (EIA 2015, 2016).

EIA (2015) suggest that to prevent loopholes, countries must harmonise their legal framework and build judicial awareness. They illustrate this point with a case study from Uganda where, following a seizure of elephant ivory cargo, the "owner" successfully petitioned the High Court to order the release of the ivory for onward export by exploiting legal loopholes – the defendant argued that as he was only transiting Uganda, there was no breach of Customs Law. In the UK, the Law Commission has highlighted the contradictory and complicated nature of wildlife legislation. The UK government committed to modernise and simplify the current body of legislation (UK Government 2015), but there is no report to date on progress towards this (EIA 2016).

Examples of good progress on strengthening legislative frameworks include Vietnam, Namibia and Malawi. In Namibia, an amendment to the Controlled Wildlife Products and Trade Act deals with possession and trade in controlled wildlife products including rhino horns and elephant ivory – (Vietnam Ministry of Agriculture and Rural Development 2018). Vietnam's new Penal Code (2017) criminalises possession of illegal wildlife products and provides greater protection for non-native species. And, in Malawi, ongoing efforts to harmonise the legal framework in line with the new National Parks and Wildlife amendment bill (2017) includes finalising CITES regulations amending the sentencing Act so it includes wildlife cases (Vietnam Ministry of Agriculture and Rural Development 2018).

### **Strengthening the judiciary**

Angola, Canada, China, the Czech Republic, Ethiopia, Indonesia, Malawi, Mozambique, Namibia, South Africa and Vietnam have all reported running workshops, conferences or outreach programmes to provide training to the judicial sector on wildlife laws and associated international conventions (e.g. CITES enforcement) (UK Government 2015; Vietnam Ministry of Agriculture and Rural Development 2016; EIA 2016; Vietnam Ministry of Agriculture and Rural Development 2018). For example, in South Africa a 'Biodiversity Crime Judicial Colloquium' was held in August 2015 and attended by 155 judicial officers (Vietnam Ministry of Agriculture and Rural Development 2016); and in Canada, the government administration of Environment Canada has funded a Court Practitioners Outreach Programme to educate judges and court practitioners on key environmental law concepts and to provide support for the unique challenges associated with using environmental legislation for prosecution (UK Government 2015).

While such efforts are important to achieve successful prosecutions and deterrent sentencing – as committed to at the London Conference – their effectiveness is not always clear. In Namibia, the judiciary have attended awareness-raising meetings but a legal review by DLA Piper identified a lack of capacity and relevant training in the judiciary as a major obstacle (EIA 2016). An important aspect for improving awareness in the judiciary sector is to

ensure that wildlife crime is part of the standard training curriculum (EIA 2016).

Positive developments to strengthen countries' judiciary sectors include the development of 'Green Courts' in Malaysia in 2012 to ensure speedy trials of cases involving environmental crime (UK Government 2015). In June 2016, Kenya established the world's first airport court at Nairobi's Jomo Kenyatta International Airport and simultaneously increased the number of magistrates and mobile courts. In the first month of operation, Kenya's airport court saw 10 cases related to ivory trafficking, and nine resulted in conviction (EIA 2016).

Uganda has established a fast-track court for wildlife crime cases. Additionally, the government has signed a 10-year MoU with and NGO (the Natural Resource Conservation Network) to delegate authority to prosecute wildlife trade cases, reportedly with the outcome of increasing prosecutions rates for wildlife crime (EIA 2016). A similar outcome has been documented in Malawi as the result of a joint litigation programme between public prosecutors and the NGO, Lilongwe Wildlife Trust (Vietnam Ministry of Agriculture and Rural Development 2016; and EIA 2016).

An important challenge for the judiciary is the lack of publicly accessible databases of wildlife crime cases. EIA (2016) found that Botswana, India, Kenya, Tanzania and Uganda do not have a centralised database for recording prosecutions relating to wildlife crime. The German government has supported the development of the global online platform WILDLEX (<https://www.wildlex.org/>) as an information service to environmental legislation and case law, with a focus on wildlife crimes (Vietnam Ministry of Agriculture and Rural Development 2018). They have also worked on regional databases such as the development of a regional information exchange network between enforcement agencies in Central Africa ("Africa-TWIX"; trade in Wildlife Information eXchange) (EU 2017).

Overly lenient or inconsistent sentencing appears to be an issue – with examples including China, Kenya, Laos, Malawi, Nepal, Thailand, the UK and Vietnam (EIA 2015, 2016). The Wildlife and Aquatic Law of 2007 in Laos stipulates imprisonment for up to five years for the import, export or re-export of protected wildlife. Yet, EIA suggest that it is possible that there has never been a single conviction for wildlife crime in Laos (EIA 2016). Similarly, in Nepal, while legislation stipulates that illegal trade in priority species (tiger, elephant, clouded leopard, gaur and rhino) could result in imprisonment of between 5-15 years, often only fines are imposed (EIA 2016).

To address issues with sentencing, countries can issue guidance. In China, the Supreme Court has issued specific sentencing guidelines for cases involving smuggling, poaching, transport and trade of protected wildlife (EIA 2016). And, in Bulgaria, to improve the judicial authorities approach to illegal killing, trapping and trade of wild

birds, the Ministry of Justice was considering sentencing principles submitted by the by Ministry of Environment and Energy, Directorate for Inspectorial Affairs (EU 2017).

A further gap is that prosecution cases often deal with low-level criminals (local hunters, drivers etc) rather than the kingpins that are part of organised criminal networks (EIA 2015, 2016). Recently, China has successfully prosecuted individuals involved in wildlife crime, but these outcomes are isolated, and do not involve individuals across the criminal supply chain – from poachers and middlemen to those financing the trafficking as well as the end-buyers (EIA 2016).

Slow criminal justice processes additionally pose challenges. In Tanzania, for example, EIA reports that progression of cases through the courts is hindered by a lack of resources (eg shortage of judges) and confusion about the applicable existing legislative framework and amendments (EIA 2015, 2016). EIA further reports that in Kenya and India case files or evidence regularly goes missing, and in India suspects frequently abscond delaying prosecution (EIA 2015, 2016). A recent study by the Wildlife Protection Society of India suggest that obstructions to justice in India's courts include the use of incorrect provisions of the Wild Life (Protection) Act (1972) and sentencing that is inconsistent with the mandatory minimum punishment prescribed by the Act (EIA 2015, 2016).

Importantly, it is not just about securing convictions. Many countries have issues with their prison system. This is illustrated in the example of the Republic of Congo, where a recent judicial review highlighted numerous escapes in recent years due to overpopulated prisons. Indeed, since 2008, the status of 320 prisoners remains completely unknown and undocumented (de Dieu Blatchy et al 2018).

### **Tackling corruption and financial crime**

In the report of progress one year on from the Hanoi conference, the German government stated that a key gap in action internationally was tackling the high levels of corruption along the entire chain of illicit trade associated with wildlife crime (Vietnam Ministry of Agriculture and Rural Development 2018). EIA (2016) concurred, noting that the prosecution of corruption has not been widely publicised, and point to examples of corruption in Cameroon, Kenya, Mozambique, Namibia, Tanzania and Uganda as symptomatic of wider challenges with systemic corruption related to wildlife crime (EIA 2016).

Tackling corruption is an important feature of two commitments in the London Declaration 2014. Reported actions taken by countries to tackle corruption include establishing Corruption Prevention Committees in Botswana; a Presidential mandate in Gabon to investigate the role of corruption in ivory smuggling (UK Government 2015); the creation of an ethical and anti-corruption unit in Ethiopia along with the recruitment of an anti-corruption officer and the approval of an employee ethical and anti-

corruption code of conduct directive; and, in Indonesia, an MoU between the Ministry of Environment and Forest and the Indonesian Anti-Corruption Agency to improve cooperation and take steps towards adopting a zero-tolerance policy on corruption associated with IWT (Vietnam Ministry of Agriculture and Rural Development 2016).

To increase the priority given to tackling corruption, the EU member states together with Senegal submitted a proposed resolution on wildlife trafficking and corruption at CITES CoP17 in 2016 which was adopted by consensus. The US, EU and partner countries also secured a Leaders' Declaration at the G20 calling on member states to focus attention on corruption surrounding the illegal wildlife trade. The G20 have drafted high-level principles for combating corruption thereby providing nations with 21 concrete actions (Vietnam Ministry of Agriculture and Rural Development 2016; Vietnam Ministry of Agriculture and Rural Development 2018). One area of priority for implementation highlighted by UNODC (2016) is strengthening the use of audit and oversight techniques over officials authorising imports and exports.

Again, despite commitments at London, Kasane and Hanoi to strengthen and update legislation to tackle other financial crimes -such as money laundering – we found little reported progress. For example, there have been few reported cases of the confiscation of assets and proceeds through money laundering charges (Vietnam Ministry of Agriculture and Rural Development 2018). It is crucial to tackle financial crime so that the serious and organised criminals involved in illegal wildlife trade do not benefit from the proceeds of their crimes (UK Government 2015).

Countries that have reported efforts to amend their legislation to tackle financial crimes include Japan, Malaysia, Mozambique, Namibia, the US and member states of the EU. Following the London conference 2014, Mozambique similarly reported that it was planning to design a legal mechanism for the harmonisation of wildlife legislation and key legislation for the prevention of organised crime, financial crime and corruption (UK Government 2015). And, prior to the Hanoi Conference, Namibia reported that it was in the process of reviewing two pieces of legislation related to wildlife – 1) the Nature Conservation Ordinance of 1975 (amended in 1996) and 2) Controlled Game Products and Trade Act of 2008 – including proposed amendments to make reference to the Prevention of Organised Crime Act (POCA) of 2004 and introduce measures to combat financial crimes related to wildlife crime (Vietnam Ministry of Agriculture and Rural Development 2016). Without undertaking a legal review, it is not clear whether the plans in either country have come to fruition. One country that has strengthened its legislation is Lao PDR, which in 2015 with the help of the UK government, enacted new anti-money laundering legislation (EIA 2016).

Often countries might not need to amend laws but, rather, raise awareness about them and use ancillary legislation – particularly legislation that is designed to address corruption, money laundering and organised crime. In Kenya, for example, it is reported that prosecutions of wildlife crimes have been boosted by use of auxiliary legislation – specifically, the Anti-Money Laundering Act (2010), the Prevention of Organized Crimes Act (2011), the Anti-Corruption and Economic Crimes Act (2003) and the Prevention of Terrorism Act (2012) (Vietnam Ministry of Agriculture and Rural Development 2016).

Efforts to raise awareness of ancillary laws have included the issuance of an advisory in India on the use of the Prevention of Money Laundering Act (2002) for cases of wildlife crime by the Wildlife Crime Control Bureau (EIA 2016). And, in Indonesia, the Ministry of Environment and Forestry together with the other law enforcement institutions reported implementing a “the multi-door law enforcement approach”, which focuses on using the corruption and money laundry act, environmental act, as well as conservation and forestry act to prosecute wildlife crime (Vietnam Ministry of Agriculture and Rural Development 2016).

A key achievement in applying ancillary legislation is provided by the UK, when in January 2016 the UK Proceeds of Crime Act was used for the first time in a wildlife crime case. The case saw an individual convicted for illegally importing and selling parts of primates and leopards and included forfeiture of the proceeds of the crime (EIA 2016).

### 4.3 STRENGTHENING LAW ENFORCEMENT

There were twelve commitments on strengthening law enforcement the London 2014, Kasane 2015 and Hanoi 2016 conferences. We have grouped these commitments under seven broad themes:

- 1 Investing in capacity building for law enforcement officials
- 2 Strengthening capacity for specialised investigations
- 3 Establishing national cross-agency coordination and collaboration
- 4 Strengthening regional and global enforcement networks
- 5 Working with existing international agencies
- 6 Engaging the private sector
- 7 Strengthening the International Consortium on Combating Wildlife Crime (ICWC)

Our analysis shows investing in capacity building for law enforcement officials, strengthening capacity for specialised investigations, establishing national cross-agency coordination and collaboration and strengthening regional and global enforcement networks had the most focus in the progress reporting (Tables 10-13). However, even though there were a large number of reports



UNODC note that generally countries lack cooperation between investigators and prosecutors, resulting in bad case design and management (Vietnam Ministry of Agriculture and Rural Development 2018). There also appears to be significant issues with countries' capacity to support specialised investigations. Specifically, EIA (2015, 2016) underline that financial investigations are far from the norm, forensic evidence is underused, and port detection and controlled deliveries are seldom employed. EIA (2016) notes that forensic crime scene investigation is all too often contaminated in preference for media coverage featuring officers holding seized tusks (EIA 2016).

EIA (2016) additionally highlight that an extensive illegal wildlife trade persists on open online trading platforms and through social media. They suggest that the scale of the issue demands further investment and training of dedicated enforcement personnel (EIA 2016).

**Tables 10-13. County action associated with the pillar of strengthening law enforcement for countries that have participated in the London 2014, Kasane 2015 or Hanoi 2016 conferences.** Note the blue cells indicate when a country is a participant of an IWT conference, and the orange cells indicate action(s) Where there is no action (ie no orange cells) this may be due to inaction, but more likely a lack of reporting.

**Table 10: Europe**[illegible]

Table 11: Africa

Country	Participants			Strengthening law enforcement						
	London	Kasane	Hanoi	Investing in capacity building	Strengthening capacity for specialised investigations	Establishing national cross-agency coordination and collaboration	Strengthening regional and global enforcement networks	Working with existing international agencies	Engaging the private sector	Strengthening the ICCWC
<b>Africa</b>										
Angola										
Botswana										
Cameroon										
Chad										
Congo										
DRC										
Ethiopia										
Gabon										
Kenya										
Madagascar										
Malawi										
Mozambique										
Namibia										
Rwanda										
South Africa										
Swaziland										
Tanzania										
Togo										
Uganda										
Zambia										
Zimbabwe										



**Table 12: Asia**

Country	Participants			Strengthening law enforcement						
	London	Kasane	Hanoi	Investing in capacity building	Strengthening capacity for specialised investigations	Establishing national cross-agency coordination and collaboration	Strengthening regional and global enforcement networks	Working with existing international agencies	Engaging the private sector	Strengthening the ICCWC
Asia										
Bangladesh										
Cambodia										
China										
Indonesia										
Japan										
Laos										
Malaysia										
Mongolia										
Myanmar										
Nepal										
Philippines										
Russia										
Singapore										
Sri Lanka										
UAE										
Vietnam										

**Table 13: Americas, Oceania and Pacific**[illegible]



### **Investing in capacity building for law enforcement officials**

Investing in capacity building to strengthen law enforcement including human and material resources was first emphasised in the London Declaration 2014, and again in the Hanoi Declaration. Many countries have reported efforts to improve the capacity of law enforcement officials such as wildlife rangers, police officers, and customs officials – including Angola, Australia, Botswana, Cameroon, China, Colombia, Ethiopia, Gabon, Indonesia, Kenya, Lao PDR, Malawi, Malaysia, Mexico, Mongolia, Mozambique, Nepal, Singapore, Sri Lanka, Tanzania, Thailand, Togo, UAE, Uganda, Vietnam, Zambia and member states of the EU.

Examples of specific actions include Ethiopia, where capacity building has involved training on patrol techniques, wildlife crime investigation, intelligence networking, evidence handling, basic military training and introductions to conservation and monitoring techniques. Along with the trainings, basic rangers' field equipment has been provided to allow for longer duration patrols (Vietnam Ministry of Agriculture and Rural Development 2016). Since 2014, Vietnam has reportedly trained 280 frontline law enforcement officers including customs, environmental police, market controls, forest rangers, and border guards, on the identification of commonly traded specimens of endangered wildlife (Vietnam Ministry of Agriculture and Rural Development 2016).

Countries also report establishing specialised wildlife enforcement bodies to improve capacity to tackle IWT. The South African Police Service's Directorate of Priority Crime Investigations has an endangered species unit dedicated to gathering intelligence relating to IWT (EIA 2016). The Namibian government has approved the formation of a Wildlife Protection Unit with a total of 488 staff members, which will be deployed country wide (Vietnam Ministry of Agriculture and Rural Development 2016). And, in Thailand, 22 new ivory patrol teams and 11 joint task force teams has been established at key border areas and ports (EIA 2016).

However, wildlife enforcement bodies may not always have the powers needed for carrying out investigations. A significant challenge for Mozambique's Environmental Police Unit is that it does not have a mandate for investigations (EIA 2016). In Uganda, legislative developments – specifically the finalising of the Wildlife (Powers of Search, Arrest, Possession and Use of Firearms) Regulations (2015) – if approved will give the Uganda Wildlife Authority the power to search, seize, arrest, prosecute offenders, rather than having to depend on state prosecutors to execute these powers on their behalf (Vietnam Ministry of Agriculture and Rural Development 2016).

Progress reports also include statements suggesting that countries are improving material resources. Canine units

have been established in Botswana, India, Mozambique, South Africa, Tanzania, Uganda and Zambia (Vietnam Ministry of Agriculture and Rural Development 2016; and EIA 2016). Indeed, in Namibia, the government has built a law enforcement training centre specialising in anti-poaching located at Waterberg Plateau Park – the centre reportedly opened in April 2017 (Vietnam Ministry of Agriculture and Rural Development 2016).

### **Strengthening capacity for specialised investigations**

In addition to building the capacity of law enforcement officials, the London Declaration 2014 included a commitment to “... use of the full range of investigative techniques and tools already deployed against other forms of domestic and transnational organised crime.” Typically country reports of progress on this theme are related to improved application of forensics and DNA analysis – this includes reports from Botswana, Colombia, Kenya, Namibia, South Africa, Thailand, Uganda and the UK

Examples are the development of a 'Standard Operating Procedure' at South Africa's OR Tambo International Airport to secure the integrity of forensic evidence on seized material related to wildlife trafficking (Vietnam Ministry of Agriculture and Rural Development 2018). In Botswana, Kenya and Namibia, trainings for law enforcement staff have reportedly included crime scene investigation, crime scene awareness and forensic analysis, and the chain of custody of evidence (Vietnam Ministry of Agriculture and Rural Development 2016; and Vietnam Ministry of Agriculture and Rural Development 2018). Furthermore, the Kenyan government has established a forensic Lab for wildlife DNA profiling – the first of its kind for East Africa (Vietnam Ministry of Agriculture and Rural Development 2016)

A number of countries have reported improvements in DNA forensics. In 2015, DNA forensic scientists from Thailand and other South-East Asian countries met to standardise testing methods in wildlife forensics and established a regional DNA database of protected species in Southeast Asia (EIA 2016). The Colombian government reported that they were developing a DNA Barcoding project to help with identification of threatened timber species versus 'look-alike' species (Vietnam Ministry of Agriculture and Rural Development 2016). And, a major achievement reported in India was the establishment and maintenance of a unique tiger stripe pattern database of over 2,000 wild tigers from India, Nepal and Bangladesh. This database can be used to identify tigers found in trade from their unique coat pattern (EIA 2016).

Other specialised investigation techniques reported include:

- In 2014, the German government reported three controlled deliveries in cooperation with the Hong Kong authorities (UK Government 2015). Collaborations have also reportedly occurred between Botswana and South Africa, the US and Hong Kong, and the UK and China (EIA 2016).

- The Kenyan Revenue Authority reportedly traced a criminal network involved in a shipment of ivory from Mombasa to Bangkok through analysing M-Pesa mobile phone bank transfer records (EIA 2016).
- In 2009, the Douanes and Droits Indirect (Directorate-General for Customs and Indirect Taxes) in France established a unit dedicated to countering cyber-criminality. This unit deals with “darknet” and social media cases related to CITES (EU 2017).
- Risk profiles have been set out to identify priority species and products that might be smuggled through Bulgaria (eg grey parrots) based on information from the EU-Trade in Wildlife Information eXchange and EU Risk Information Forms (EU 2017). The Indian government has reportedly set up an e-vigilance system using detection technology including drones and cameras as part of an e-vigilance system to combat illegal logging and red sandalwood smuggling in the state of Andhra Pradesh (EIA 2016).

### **Establishing national cross-agency coordination and collaboration**

We identified 24 countries reporting actions under the commitment to establish and maintain national cross-agency mechanisms, as set out in the London Declaration 2014. Examples include the Thai-Wildlife Enforcement Network, which comprises 22 agencies, including prosecutors and judiciary (EIA 2016). In Mongolia, the government has reported establishing a National Council for the prevention of environmental crime under the Ministry of Justice and Internal Affairs tasked with organising and planning future activities towards prevention for the environmental related crime. The council includes representatives from the Customs General Administration, the Criminal Police department of National Police Agency, the General Authority for Border Protection and the General Agency for Specialized Inspection – (Vietnam Ministry of Agriculture and Rural Development 2018). And, in India the lead multi-agency unit, the Wildlife Crime Control Bureau (WCCB), collects and disseminates intelligence and coordinates and participates in operations. The WCCB has requested every state in India to set up a high-level inter-agency coordination committee called a Wildlife Crime Control Unit (WCCU) to improve information exchange between state and central authorities – 14 states have set up WCCUs so far (EIA 2016). There are, however, some reported issues with cross-agency collaboration. The progress reports highlighted a lack of adequate resources for Malawi’s Inter-Agency Committee on Combating Wildlife Crimes, and South Africa’s National Wildlife Crime Reaction Unit (NWCRU). Furthermore, in South Africa the NWCRU has received limited cooperation from the provincial authorities and police (EIA 2016). In Tanzania and Laos there is reportedly a lack of clarity of roles and responsibilities of agencies involved in multi-agency collaboration (EIA 2016).

### **Strengthening regional and global enforcement networks**

The Kasane Declaration includes commitments to “support the strengthening and, if necessary, the establishment of regional wildlife enforcement networks” as well as to “support existing, and, if necessary, the establishment of new, global and regional networks of prosecutors responsible for prosecuting offences involving organised crime”. As shown in tables 10-13 we found 29 reports of activity related to this commitment – in particular, reports concerned joint border patrols, participation in regional enforcement networks and memorandums of understanding between IWT source, transit and/or demand countries.

For example, Uganda reported that they have established joint border patrols with neighbouring countries such as the Republic of South Sudan, Kenya, Rwanda and the DRC (Vietnam Ministry of Agriculture and Rural Development 2016). Zambia reported that joint cross border law enforcement operations have been conducted with Malawi, Tanzania and Zimbabwe (UK Government 2015). And, EIA (2016) described that in 2016 frontline enforcement officers from key border areas in Laos, China and Vietnam participated in a field mission to discuss wildlife smuggling networks along the major Indo-Myanmar trade route.

The following wildlife enforcement networks were described as operational (EIA 2016):

- North American Wildlife Enforcement Network – Canada, Mexico and the USA.
- European Commission Enforcement Working Group – EU member states.
- Lusaka Agreement Task Force – Kenya, Uganda, Liberia, Lesotho, Republic of Congo, Tanzania and Zambia.
- Horn of Africa Wildlife Enforcement Network – Kenya, Uganda, Djibouti, Eritrea, Ethiopia, Somalia, South Sudan and Sudan.
- ASEAN Wildlife Enforcement Network – Brunei, Cambodia, Indonesia, Lao PDR, Malaysia, Myanmar, Philippines, Singapore, Thailand and Vietnam.
- South Asia Wildlife Enforcement Network – Afghanistan, Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan and Sri Lanka.

An additional Southern African wildlife network comprising Angola, Botswana, Malawi, Mozambique, Namibia, South Africa, Swaziland, Zambia, and Zimbabwe was reported as being under discussion, but by the time of the latest progress report, not yet active (EIA 2016).

We found reports of memorandums of understanding (MoUs) or other forms of bilateral agreements being established between countries. Mozambique has reportedly signed three MoUs – one with Tanzania to address information exchange and collaboration in the cross-border Selous–Niassa ecosystem, a second with Vietnam

on cooperation to combat illegal wildlife trade and a third with China for improving collaboration to combat organised crime (EIA 2016). Vietnam have reportedly signed six MoUs: with South Africa, Indonesia, Lao PDR, and Cambodia on forest and wildlife protection and CITES implementation; and with China and the Czech Republic on strengthening CITES enforcement.

EIA (2018) stress that key strategic regional collaborations to tackle critical trade routes along the wildlife trafficking trade chain are missing, specifically between Mexico-US-China in relation to totoaba trafficking, Tanzania-Mozambique-Uganda-Nigeria-Malaysia-Vietnam-China in relation to ivory and pangolin trafficking, and India-Nepal-China in relation to the trans-Himalayan tiger and Asian big cat trafficking. EIA (2018) also suggest that more could be done to investigate and disrupt transnational organised wildlife crime networks by directing financial intelligence units (FIUs) to collaborate regionally. For example, they suggest that the FIUs of Laos, Hong Kong, China, Thailand and the US should collaborate to dismantle the Zhao Wei network (EIA 2018).

#### **Working with existing international agencies**

At the Hanoi Conference 2016, countries stated that they must collectively “ensure that central authorities for international crime cooperation are sufficiently resourced and empowered to respond to, and action, requests for extradition and mutual legal assistance efficiently.” No countries have yet reported any specific progress against this commitment.

#### **Engaging the private sector**

The Kasane Conference 2015 included a specific call for engagement with the transport sector “to raise awareness of the role they can play – (e.g. support the development and implementation of industry-wide protocols and/or guidelines by the logistics and transportation sector on strengthening due diligence and other measures to eliminate the illegal trade in wildlife)”. The UK has made key progress here setting up the United for Wildlife Transport Taskforce which brings high-level leaders from the transport industry together with representatives from across the world of conservation (Vietnam Ministry of Agriculture and Rural Development 2016). In March 2016, the Buckingham Palace Declaration was signed by 40 transport associated organisations, including airlines, shipping companies, and port operators. The Declaration details 11 commitments for better information sharing to enable stronger enforcement against the wildlife trade in the transport sector (EIA 2016). Other efforts involving airlines have been reported in Cameroon (supported by Germany and COMICAF), Kenya, Thailand, and the UAE.

The Hanoi Conference encouraged extension of this type of activity to other sectors (“We urge other business sectors that could be exploited by criminals involved in the illegal wildlife trade to follow the example set by the transport sector. We call upon governments to strengthen

engagement with the private sector”). We have reported on other private sector engagement activities under the Eradicating the Market pillar and there is nothing further to add at this stage.

#### **Strengthening the International Consortium on Combating Wildlife Crime (ICWC)**

The intention to strengthen and support the ICWC was introduced in the Kasane Declaration and echoed in the Hanoi Statement recognising that the ICWC toolkit could be used by countries to identify priorities to strengthen their criminal justice systems and enhance enforcement capacities. UNODC (2016) report that, to date, they have conducted comprehensive national assessments using the ICWC toolkit in eight countries – Bangladesh, Botswana, Congo, Gabon, Mexico, Nepal, Peru, and Vietnam – and have developed evidence-based recommendations and actions for law enforcement, prosecution, judiciary and legislative review. The reports are not, however, publicly available and so no further details are available.

#### **Other actions**

In Angola (UK Government 2015) and Myanmar (Vietnam Ministry of Agriculture and Rural Development 2018) research has been conducted to understand major wildlife trafficking routes – including internal and cross-border markets and trade routes.

### **4.4 SUSTAINABLE LIVELIHOODS AND ECONOMIC DEVELOPMENT**

There are 10 commitments in total from the London 2014, Kasane 2015 and Hanoi 2016 IWT conferences related to supporting sustainable livelihoods and economic development. These can be grouped under seven broad themes:

- 1 Tackling negative impacts of IWT
- 2 Supporting sustainable livelihood opportunities
- 3 Supporting community led conservation
- 4 Supporting wildlife-based livelihoods/ benefits
- 5 Involving local people as law enforcement partners
- 6 Reducing the costs of living with wildlife
- 7 Supporting information sharing about community-based approaches

Only 22 countries reported any progress against the commitments in this pillar. Progress reports following each of the IWT conferences acknowledge that of the four pillars, this is the least implemented. A key challenge noted in the progress report following the London conference is that the London Declaration did not specify the potential to introduce legislation or related guidance for supporting sustainable livelihoods and economic development (UK Government 2015). Tables 14-17 provide a summary of reports of action across the seven themes of this pillar. Note in this analysis we were only recording action at home. However European countries have supported action under



The information provided on this pillar in the progress reports is so limited that we have not separated it out on a thematic basis. Typically, the actions that *have* been reported are related to maintaining support for community based natural resources management (CBNRM) programmes, promoting alternative livelihoods and the inclusion of local people in law enforcement efforts. For example, Botswana and Namibia reported information about their CBNRM programmes with 28 wildlife-based community organisations registered in Botswana and 83 registered conservancies in Namibia (Vietnam Ministry of Agriculture and Rural Development 2016; and Hanoi).

While there was limited reported progress on this pillar, research conducted via an IIED-supervised Masters thesis (Wilson-Holt 2018) highlights new regional and national strategies that are emerging in Africa. An interesting example is the East African Community Strategy to Combat Poaching, Illegal Trade and Trafficking of Wildlife and Wildlife Products (2016) which has a strong community focus including: creating and strengthening wildlife based revenue sharing schemes; creating community based wildlife crime intelligence and enforcement networks; making community participation in planning and wildlife management a legal requirement; increasing the capacity of local communities to pursue sustainable livelihood opportunities and eradicate poverty; establishing mechanisms to prevent problem animals and compensation/consolidation schemes for wildlife induced damage (Wilson-Holt 2018). The South African Development Community Law Enforcement and Poaching Strategy (2015) similarly recognises the value of communities including: community owned and managed structures with associated wildlife related benefits for long term engagement, support and continuity; accruing financial, or in-kind benefits and payments for ecosystem goods and services to local communities; regulated access to natural resources in PAs; training and equipping community rangers to support enforcement efforts; and minimising the impacts of HWC (Wilson-Holt 2018).

**Table 14: Europe**[illegible]

Table 15: Africa

Country	Participants			Supporting sustainable livelihoods and economic development						
	London	Kasane	Hanoi	Tackling negative impacts of IWT	Supporting sustainable livelihood opportunities	Supporting community-led conservation	Supporting wildlife-based livelihoods/benefits from wildlife	Involving local people as law enforcement partners	Supporting info. sharing	Reduce cost of living with wildlife
<b>Africa</b>										
Angola										
Botswana										
Cameroon										
Chad										
Congo										
DRC										
Ethiopia										
Gabon										
Kenya										
Madagascar										
Malawi										
Mozambique										
Namibia										
Rwanda										
South Africa										
Swaziland										
Tanzania										
Togo										
Uganda										
Zambia										
Zimbabwe										

At the national level, examples include Mozambique which amended and republished Law No. 16/2014 in 2017 on the basic principles and rules on the protection, conservation and sustainable use of biological diversity within conservation areas and has include provisions on: the state's obligation to reduce the incidence of HWC; acknowledging and respective local subsistence communities' knowledge and culture including customary community use for historical religious spiritual or cultural reasons; and the definition of a community conservation area. Although, the law makes the provision for allowing the state to resettle people and communities (Wilson-Holt 2018).

Similarly, the Uganda government has published a Community-Based Wildlife Crime Prevention Action Plan (2017-2023) in recognition of the different ways to include local communities in tackling wildlife crime. The action plan includes: establishing resource access rights and performance payments; improving working relationships between state agencies and local communities to support law enforcement; providing alternative livelihood options such as wildlife friendly enterprise schemes; and reducing the impacts of human wildlife conflict (Wilson-Holt 2018).

There are additional examples of strategies and reviews that have taken place such as an Illegal Wildlife Trade Review (2015) in Malawi which includes lots of recommendations on communities and examples of where things have or haven't worked (Wilson-Holt 2018). In South Africa, the National Integrated Strategy to Combat Wildlife Trafficking 2017 emphasises the need to improve local communities' economic welfare and the need for government and NGOs to identify innovative approaches for communities to participate in conservation-based economy (Wilson-Holt 2018). And in Zimbabwe, the National Elephant Management Plan (2015-2020) recognises different ways to include local communities including: providing for traditional leadership involvement in the management and distribution of elephant related benefits; training local community members to engage in wildlife and tourism management; revitalising technical support services to communities; introducing new incentive schemes for communities to report illegal behaviour; incorporating community involvement in the management of wildlife areas, enterprises and joint ventures; and devolving decision-making on aspects of problem animal control to communities (Wilson-Holt 2018).

[illegible][illegible]



## 5. FUNDING FOR TACKLING IWT

Women and children collect water from a newly installed tap system on the edge of Virunga National Park in the Democratic Republic of the Congo.

### Funding trends 2010-2016

In 2016, under the auspices of the Global Wildlife Program (GWP) the World Bank conducted an analysis of donor funding for IWT (Wright et al 2016). Data was collected from 24 government, NGO and private (philanthropic foundation) donors (summarised in Table 18) and covered projects that were approved from 2010 to mid-2016 (although not all donors provided information for 2016).

**Table 18:** Agencies surveyed in World Bank analysis for funding for IWT 2010-2016

Donor Type	Countries/Agencies
Bilateral	Canada, France, Germany, Japan, Netherlands, Spain, Sweden, UK, US
Multilateral	Asian Development Bank, European Commission, GEF, World Bank
United Nations	UNDP, UNEP
Foundations	Vulcan Philanthropy, Wildcat Foundation, Oak Foundation
NGOs	FFI, WildAid, WCS, WWF, ZSL

The analysis focussed on projects in Africa and Asia as well as global initiatives. Projects in Latin America and the Caribbean, the Middle East, and other regions were excluded. The report does not provide a rationale for this but presumably it was due to limitations of resources and a need to focus on priority source and demand countries. Projects were categorised according to six key types of intervention:

- 1 Policy and legislation development
- 2 Law enforcement
- 3 Protected area management to prevent poaching
- 4 Communications and awareness to reduce demand for illegal wildlife products
- 5 Promotion of sustainable use and alternative livelihoods to increase community benefits and reduce human wildlife conflict
- 6 Research and assessment

While not the same as the four pillars of the state-led conferences they are, with the exception of the research and assessment category broadly similar – and it could be assumed that research and assessment cuts across all the pillars (Table 19).

**Table 19:** How the State-led Conference Pillars Correspond to World Bank analysis categories

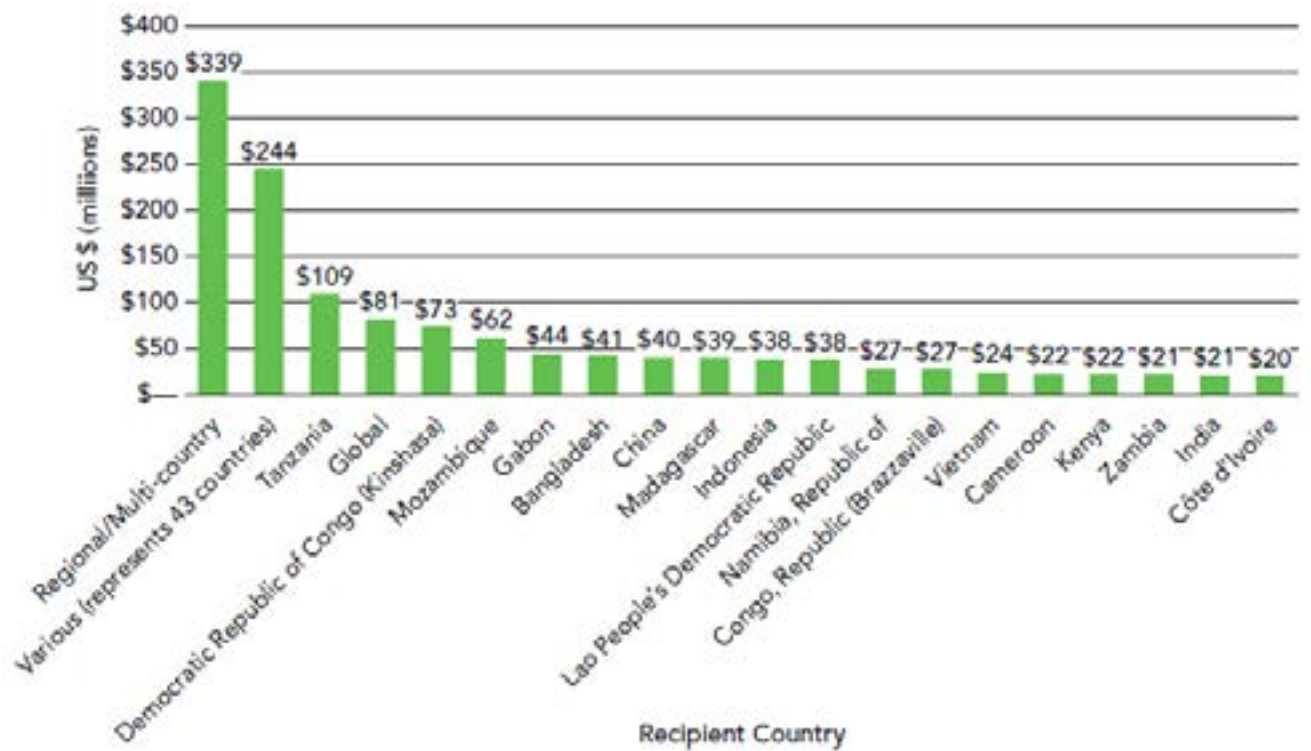
Conference Pillar	World Bank Category
Eradicating the market for illegal wildlife products	Communications and awareness to reduce demand for illegal wildlife products Research and assessment
Ensuring effective legal frameworks and deterrents	Policy and legislation development Research and assessment
Strengthening law enforcement	Law enforcement Protected area management to prevent poaching Research and assessment
Sustainable livelihoods and economic development	Promotion of sustainable use and alternative livelihoods to increase community benefits and reduce human wildlife conflict Research and assessment

Key findings from the World Bank analysis include:

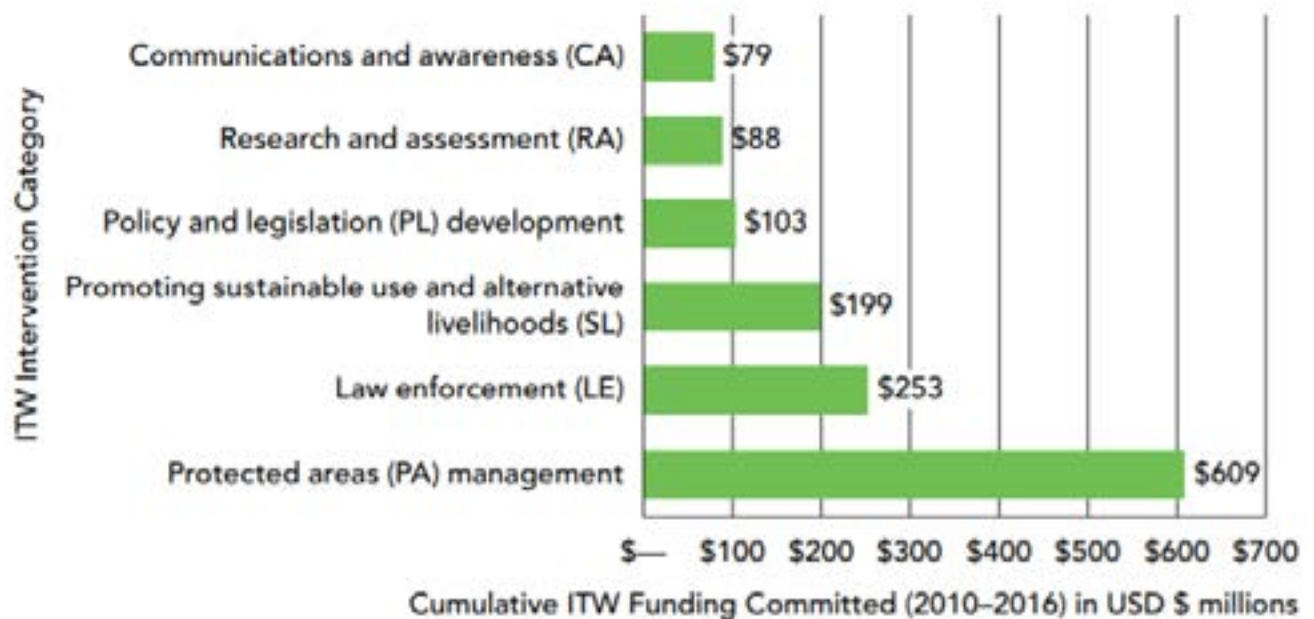
- A total of \$1.3 billion was committed by the 24 international donors between 2010 and June 2016, funding 1,105 projects in 60 different countries and various regional and global projects.
- Funding increased from \$26 million in 2010 to a peak of \$316 million in 2014. Figures for 2015 and 2016 were \$243 million and \$247 million respectively but noting that 2016 figures are only partial
- The top five donors were the Global Environment Facility (GEF) – \$345m, Germany – \$293m, the United States – \$187m, the European Commission – 164m, and the World Bank Group – \$157m, who together contributed \$1.1 billion of the total funding (86%).
- Sixty-three percent of the funds went toward efforts in Africa (\$833 million), 29% to Asia (\$381 million), 6% to global programmes (\$81 million), and 2% to projects covering both Africa and Asia (\$35 million).
- The top five recipient countries were Tanzania (8%), the Democratic Republic of Congo (5%), Mozambique (5%), Gabon (3%), and Bangladesh (3%) (Figure 3).
- Forty-six percent of the funding supported protected area management, while 19% went to law enforcement (in IWT Conference pillars this equates to 65% to law enforcement), 15% for sustainable use and alternative livelihoods, 8% for policy and legislation, 6% for research and assessment, and 6% for communication and awareness raising (Figure 4).



**Figure 3:** Top recipients of IWT Funding in Africa and Asia 2010 – mid-2016  
(Source Wright et al 2016)



**Figure 4:** Allocation of IWT funding to different types of intervention in Africa and Asia (source Wright et al 2016).





Apart from the lack of coverage of Latin America, one limitation of the World Bank analysis is that it does not show how funding to different countries has changed progressively year on year – only cumulative data from 2010 to mid-2016 (and the data for 2016 does not include all donors). So it is not possible to get a picture of how/whether funding to specific countries has changed in response to commitments made at the state-led conferences. Nevertheless it provides a fascinating overview of trends in funding in terms of priority themes and countries.

### IWT funding 2016-18

To complement the World Bank analysis we sought to identify funding that has been allocated since 2016, or that was allocated between 2010 and 2016 but not previously included in the World Bank study (i.e. funding allocated to Latin America), and to explore this on a country-by-country basis, pillar-by-pillar basis. Our availability of time for this exercise was very small compared to that for the World Bank study, and our access to data very constrained compared to World Bank access. Our analysis therefore focusses on easily accessible, publicly available information – specifically the project database of the GEF, project summaries generated by USFWS and UK IWT Challenge Fund. This was supplemented by the 2016 financial report of USAID (USAID 2017) which provides information on annual spend on IWT at a country/regional level (as opposed to project-level commitments – unlike the other sources of information) and any other ad hoc sources of information we could find via web searches (for example we found information on a couple of EU projects funded since 2016 and on an ICCWC project funded by multiple countries). The findings presented here should thus be treated as illustrative rather than a comprehensive analysis. A further source of potential error is the likelihood of double counting of some funds. For example, some funds recorded by USAID in its 2016 aggregate figures will have been allocated to USFWS projects and so also potentially recorded under USFWS. Further, although the formal USAID data is supplied on an aggregate country level basis, we found information on a number of individual projects in Southern Africa. We *think* the funds for these projects were committed in 2017 and so were not included in the 2016 financial report, but it may be that some 2016 funds have been double counted in these projects if they did indeed start prior to 2017.

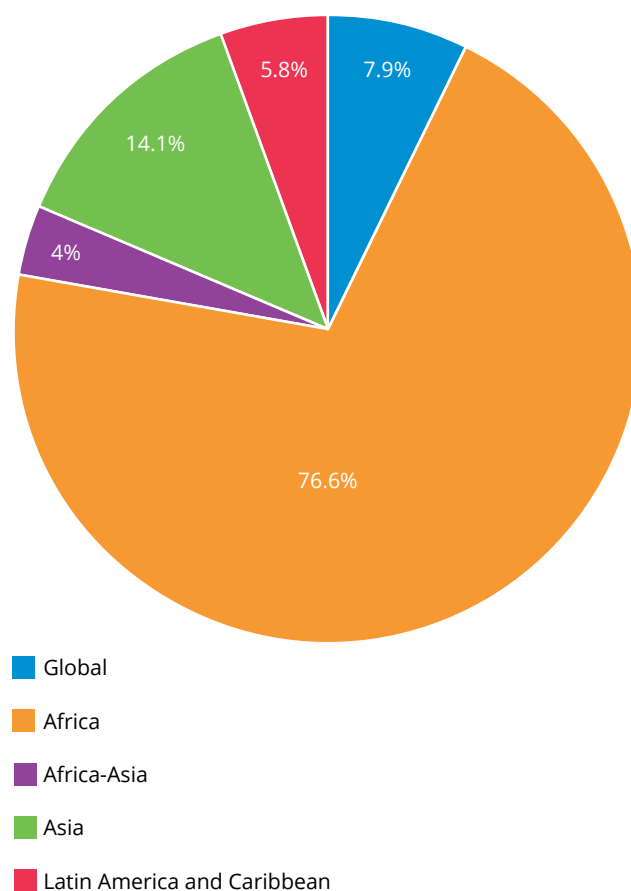
In total we identified an additional \$310 million dollars of funding – from these agencies alone. Of this, \$280 million dollars was committed since the World Bank analysis was completed while \$30 million was committed between 2010 and 2016 but not included in the World Bank analysis. This includes \$20 million funds committed to Latin America and Caribbean, but also \$10 million of funding commitments to a few African (Sierra Leone, Guinea Bissau, Cape Verde) and a few Asian (Kyrgyz Republic, Tajikistan and Solomon Islands) not included in the analysis. The reason for the omission of these countries is perhaps lack of clarity over

the direct link of the funds to IWT. The pre-2016 projects in the African countries and the Solomon Islands were all for marine turtle projects where poaching might equally be for domestic consumption as for illegal wildlife trade. The pre-2016 projects in Kyrgyz Republic and Tajikistan were both snow leopard projects where the major challenge is human wildlife conflict. But such conflict leads to retaliatory killings and associated IWT.

### Geographical distribution of funding

Because we have only accessed funding information from a limited number of donors compared to those reviewed by the World Bank, adding our pre-2016 figures to those obtained by the World Bank would not provide clarity on the overall proportion of funding going to Latin America compared to Africa and Asia as it would still only reflect a small proportion of the total. To explore recent *trends* in geographical distribution of funding, however, we can compare how our limited set of donors have distributed their funds since 2016. Our analysis shows an even greater emphasis on Africa than the World Bank analysis, with the vast majority (73%) of funding allocated to Africa but also includes nearly 6% going to Latin America (Figure 5).

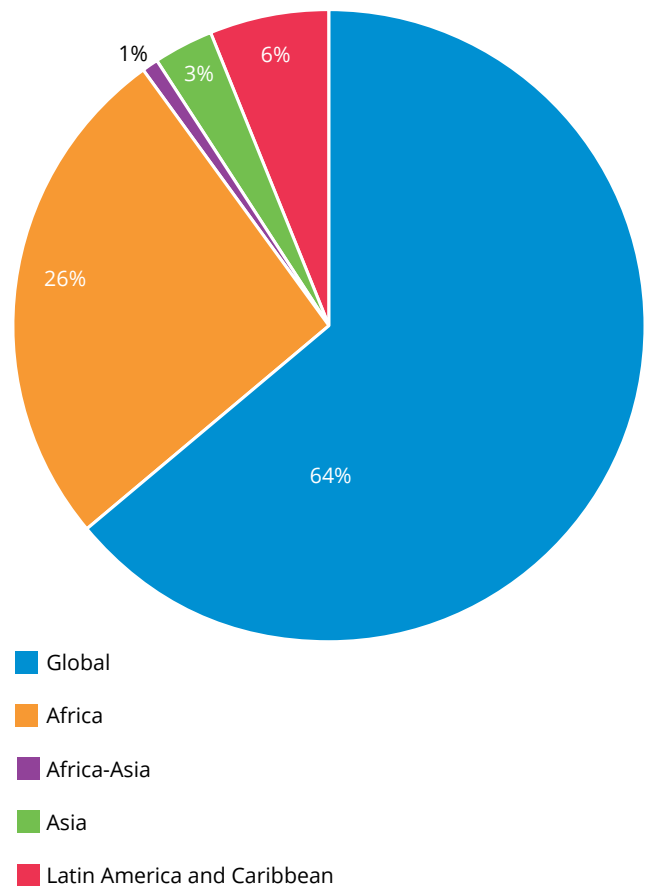
**Figure 5:** Distribution of \$280m funding for IWT committed since 2016 (predominantly GEF, US and UK funds).



This finding no doubt reflects the bias of the limited range of donors we included but the fact that it is not inconsistent with the World Bank analysis indicates that it is a general reflection of the current funding situation. It also reflects the emphasis of major IWT initiatives. For example, the Global Wildlife Program, established in 2015, is a US \$131 million initiative funded by the Global Environment Facility (GEF) and led by the World Bank Group (WBG). It includes 19 countries from across Africa and Asia but none from Latin America. Indeed, one of the key findings from a recent evaluation of the GWP was that it should expand to include Latin America.

If we add the “new” or “overlooked” funding identified in this study to the totals calculated by the World Bank, the emphasis on Africa is reduced somewhat (Figure 6) and a small allocation to Latin America is introduced, but the overall pattern is the same – and consistent with the World Bank findings (Figure 7).

**Figure 6:** Relative geographical distribution of IWT funds 2010-2018 (limited range of donors 2016-2018).



**Figure 7:** Geographical distribution of “new” IWT funds compared to World Bank analysis



In terms of individual recipients of IWT funds, if we add the additional funds we identified to those already identified by the World Bank, the top four recipient countries remain the same: Tanzania, DRC, Mozambique and Gabon. Our additional funds push Indonesia into fifth place ahead of Bangladesh (Figure8).

If, however, we just look at the recipients of the additional funding we identified *since* the World Bank analysis was completed the top recipients change. The largest allocations for the recent funds we identified have gone to regional or multi-country programmes and the biggest individual country recipient was Brazil – despite Latin America being the region with the least funding (Figure 9). The reason Brazil stands out is because of the award of a \$13 million GEF project. The [National Strategy for Conservation of Threatened Species Project \(PRO-SPECIES\)](#) is intended to address a variety of conservation threats and includes a major component on tackling poaching and IWT in mammals, birds fish and plants. The project highlights one of the challenges of monitoring funding allocated to IWT, however, since many large-scale projects such as those funded by the GEF address multiple threats to biodiversity with IWT often just one component of a larger initiative. To obtain an accurate assessment of IWT funding, analyses such as this and that of the World Bank would have to unpack the project budget in order to determine the proportion allocated to IWT activities.

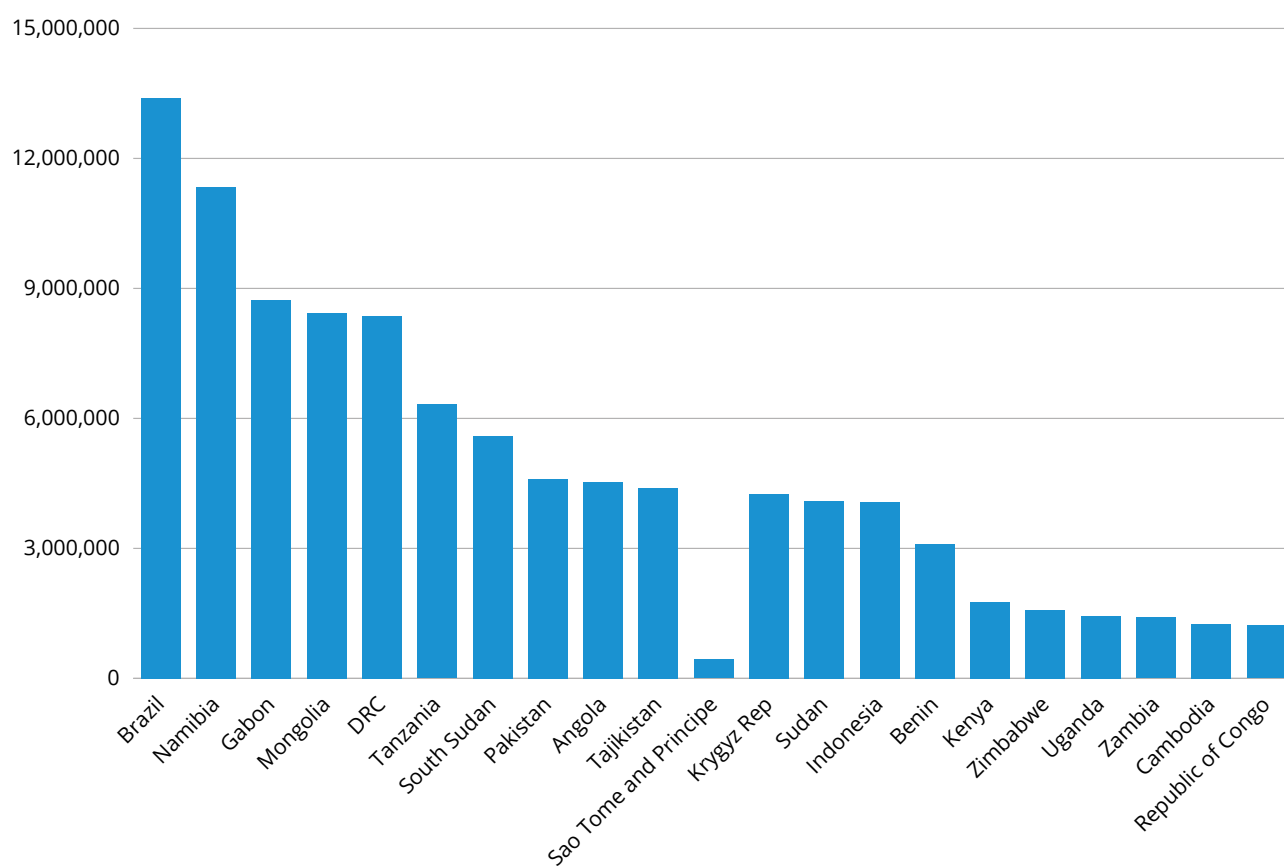
### Conference pillars addressed

Based on the level of information we were able to access about IWT funding since 2016, it was not possible to determine how much funding was allocated to each of the four state-led conference pillars. For the World Bank to do this required a survey with technical donor staff as well as many follow up discussions (Ellison Wright pers comm). What we were able to do, however, was to use project summaries to make an informed guess as to which pillars the project was prioritising. With more time available, and more detailed project summaries it might be possible to extend this analysis to explore which themes within each pillar (as discussed in the previous section) the projects were addressing, but this was not possible within the immediate time and resources of this study.

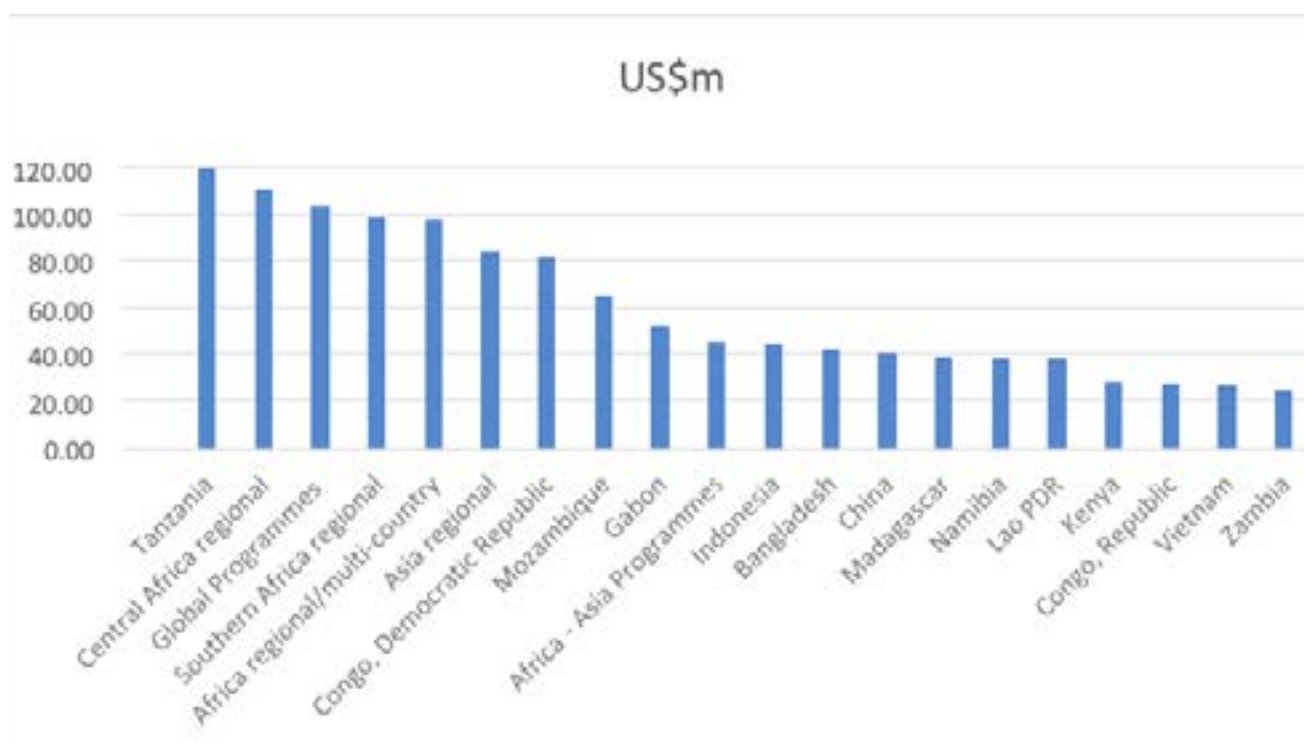
As with the funding analysis, this following analysis of projects and their priorities should be treated as illustrative of key trends only, based on a review of limited information and a limited number of donors.

Overall we identified over 450 projects that had not been included in the World Bank analysis. In the vast majority of cases the projects focussed on more than one of the IWT Conference pillars and it was not possible from the information provided to determine the relative priority afforded to each pillar. Furthermore in some cases – particularly GEF and USFWS projects – tackling

**Figure 8:** Top 20 recipients of IWT funds 2010-2018





**Figure 9:** Largest recipients of IWT funds from selected donors 2016-2018

IWT was often one component of a larger project and it was not possible to determine the relative priority given to IWT compared to other issues. Overall, however we found that, of the projects we identified, 83% included a focus on law enforcement, while only 4% included a focus on demand reduction. Furthermore, 40% of projects included a focus on activities beyond the four pillars. In many cases these were general environmental education activities but there were also some specific activities such as dehorning of rhinos to reduce poaching risk, establishment of sanctuaries for confiscated animals etc. Table 20 summarises the overall distribution of emphasis of the

projects we identified. Wider analysis of projects from a wider set of donors would be required to determine the degree to which this pattern of relative concentration on the four IWT pillars is representative of all IWT funding or biased by the sample. It is likely to be quite biased since the most prolific source of project-level information we found was from USFWS, the majority of whose projects do have a strong emphasis on law enforcement. Nevertheless, this finding is broadly consistent with the World Bank 2016 analysis where law enforcement (including protected area management) accounted for the majority of IWT funding.

**Table 20:** Relative emphasis of IWT projects on the conference pillars

	Reducing demand	Legal frameworks	Law enforcement	Livelihoods	Other
No of projects	17	73	380	153	181
% of all project	4%	16%	83%	33%	40%

## 6. SUFFICIENCY OF ACTIONS – ARE INVESTMENTS IN TACKLING IWT PAYING OFF?

**ZERO POACHING**

An anti-poaching team  
prepare for a patrol in Kui  
Buri national park, Thailand.

**Table 21:** Changes in African rhino poaching rates 2006 – 2015 (source Emslie et al 2016)

Country	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Botswana	-	-	-	-	-	-	2	2	-	-
DR Congo	-	-	2	2						
Kenya	3	1	6	21	22	27	29	59	35	11
Malawi	-	-	-	-	-	-	2	1	2	1
Mozambique	-	9	5	15	16	10	16	15	19	13
Namibia	-	-	-	2	2	1	1	4	30	90
South Africa	36	13	83	122	333	448	668	1,004	1,215	1,175
Swaziland	-	-	-	-	-	2	-	-	1	-
Tanzania	-	-	2	-	1	2	2	-	2	2
Uganda	-	-	-	-	-	-	-	-	-	-
Zambia	-	1	-	-	-	-	-	-	-	-
Zimbabwe	21	38	164	39	52	42	31	38	20	50
<b>Total</b>	<b>60</b>	<b>62</b>	<b>262</b>	<b>201</b>	<b>426</b>	<b>532</b>	<b>751</b>	<b>1,123</b>	<b>1,324</b>	<b>1,342</b>
<b>Poached/day</b>	<b>0.16</b>	<b>0.17</b>	<b>0.72</b>	<b>0.55</b>	<b>1.17</b>	<b>1.46</b>	<b>2.05</b>	<b>3.08</b>	<b>3.63</b>	<b>3.68</b>

In an ideal world one would want to be able to measure the effectiveness of investments in IWT in terms of reductions in poaching and recoveries of affected wildlife populations. This analysis has not attempted to review the reported effectiveness of IWT projects, however it is likely that only a small proportion actually measure their effectiveness anyway. A recent review of projects specifically focused on engaging communities to tackle IWT found that of 45 initiatives identified, only 18 reported on their effectiveness (either in terms of reducing poaching or maintaining/increasing wildlife populations) (Roe and Booker, in press).

At the country level there has been no standardised or widespread monitoring and reporting of IWT incidents. CITES CoP 17 Resolution Conf. 11.17 (Rev. CoP17) introduced a non-mandatory request for illegal wildlife trade reports commencing from 2017 which may help with trend monitoring going forward, however at the time of writing no reports were available on the CITES website.

There are some species – specific analyses of IWT trends based on poaching incidents and seizure data as is the case for elephants via the CITES MIKE system and rhinos via the IUCN Rhino Specialist Group-TRAFFIC reports to CITES on rhinos. In both cases the most recent reports available are those presented to the last CoP (CoP 17 in 2016).

As far as African rhinos go, a report to the last (2016) CITES CoP<sup>6</sup> shows the number of poaching incidents per country from 2006 to 2015 (Table 21). The report notes South Africa and Mozambique as the two source countries of most concerns but also that “Kenya, Namibia, Nigeria, Uganda and Zimbabwe have made, or been implicated in, numerous rhino horn seizures over this period”. Vietnam is reported as the import country of most concern (Emslie et al 2016). For Asian rhinos, India is reported as the country of most concern for poaching – with Nepal reporting zero poaching for the last few years.

For elephants the most recent report from the Elephant Trade Information System (ETIS) to CITES CoP 17 provides a comparison of countries that were of concern in 2013 (CoP16) compared to 2016 (CoP 17), highlighting China, Hong Kong, Kenya, Malawi, Singapore, Tanzania, Togo, Uganda and Vietnam as the current countries of “primary concern” (CITES Secretariat 2016). South Africa and Thailand which, at the 2013 CoP, were countries of primary concern are now in the secondary concern country, while Uganda which was previously of secondary concern has now moved up to the primary concern category. Togo and Malawi have also joined the primary concern category having previously not featured in the analysis (Table 22).

<sup>6</sup><https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-68-A5.pdf>



**Table 22:** Countries of concern for illegal trade in elephants (CITES Secretariat, 2016)

Priority Ranking	CoP16 Cluster Analysis	CoP17 Cluster Analysis
<b>Countries/territories of 'primary concern'</b>	<i>China, Hong Kong SAR, Kenya, Malaysia, the Philippines, South Africa, Tanzania, Thailand, Viet Nam</i>	<i>China, Hong Kong SAR, Kenya, Malawi, Malaysia, Singapore, Tanzania, Togo, Uganda, Viet Nam</i>
<b>Countries of 'secondary concern'</b>	<i>Cameroon, Congo, Democratic Republic of the Congo, Egypt, Ethiopia, Gabon, Mozambique, Nigeria, Taiwan (province of China), Uganda</i>	<i>Cambodia, Cameroon, Congo, Ethiopia, Gabon, Nigeria, Sri Lanka, South Africa and Thailand</i>
<b>Countries 'important to watch'</b>	<i>Angola, Cambodia, Japan, Lao PDR, Qatar, United Arab Emirates</i>	<i>Angola, Democratic Republic of the Congo, Egypt, Japan, Lao PDR, Mozambique, the Philippines, Qatar, United Arab Emirates</i>

Another source of IWT statistics is the seizure data collected by TRAFFIC. Analysis of this data for a number of key species from 2010 to 2017 highlights the countries where the most seizures have occurred (Table 23). However Sabri Zain (pers comm) notes that the data is unreliable because it is taken from media reports which are biased to certain species and geographic areas – “the media focus is skewed in both the countries and species it focuses on.” The data therefore comes with a warning that “it is therefore not possible to assume from these data alone any trade trend conclusions. In addition to these biases, the ability and willingness of a country to make seizures is dependent on a number of factors, and countries do not all make seizures at the same rate. Therefore, just because a country makes a large number of seizures, it does not mean it is the country with the largest volume of illegal wildlife trade or that its efforts to curb illegal wildlife trade are effective. To add further complexity, the factors influencing seizure rate and reporting rate will vary over time. Due to these complexities, the use of seizures as a measure of illegal wildlife trade is unreliable and trends in the data may reflect changes in reporting rates or enforcement effort rather than trends in trade.”

Nevertheless, the TRAFFIC data provides insights on seizures of a wider range of species than rhinos and elephants which may highlight countries where there may be problems (even if there are additional unrecorded seizures elsewhere).

#### **How do the countries of most concern correlate with the countries of most funding?**

Using the TRAFFIC seizure data and the combined funding data from the World Bank analysis and this study, it is possible to explore how the countries “of concern” (as signified by high levels of seizures, with all the caveats associated with that) correlate with those that receive the most funding (Table 24). Mozambique is the only country of concern that is among the top recipients of funds (over \$50 million since 2010). Nigeria, by contrast is a country of concern that is amongst the least well-funded (less than \$1 million since 2010). Guinea and the Russian Federation are two other source countries of concern with relatively low levels of funding (\$1-4 million since 2010). There are a number of Far East (Hong Kong, UAE, Qatar) and one European (Belgium) countries that receive no funding but this is perhaps not surprising given that a large proportion of IWT funds come from overseas aid budgets which would not be eligible to spend funds in high income countries. The majority of countries that signify concern for IWT because of high numbers of seizures fall in the category of receiving \$10-50 million since 2010).

Similarly using ETIS data on countries of most concern, Tanzania is the single biggest recipient of IWT funds since 2010, but Singapore and Togo who are both on the list are in the category that have received less than \$1 million (Table 25).

**Table 23:** Source, transit and destination countries with high levels of seizures of key species in illegal trade (source TRAFFIC Seizures database)

	<b>"Top 5" Source countries with most seizures 2010-2017</b>	<b>"Top 5" Transit countries with most seizures 2010-2017</b>	<b>"Top 5" Destination countries with most seizures 2010-2017</b>
<b>African Elephant</b>	Nigeria	Belgium	China
	Guinea	Malaysia	Hong Kong
	Mozambique	United Arab Emirates	Viet Nam
	Angola	South Africa	Lao PDR
	South Africa	Thailand	Thailand
<b>Pangolin</b>	Nigeria	Belgium	China
	Cameroon	India	Hong Kong
	India	Viet Nam	Viet Nam
	Indonesia	China	Lao People's Democratic Republic
	Malaysia	Thailand	India
<b>Rhino</b>	South Africa	South Africa	Viet Nam
	Mozambique	China	China
	India	Qatar	Hong Kong
	China	Hong Kong	South Africa
	Viet Nam	Thailand	India
<b>Tiger</b>	India	India	China
	Indonesia	Thailand	Indonesia
	Viet Nam	Indonesia	Viet Nam
	Thailand	Nepal	India
	Russian Federation	Viet Nam	Nepal

One interpretation of this could be that the money is being spent in the countries where the biggest problems are. A more cynical interpretation could be that, despite significant investments of funds, these countries still remain of concern for IWT. Rigorous monitoring of the impacts of the projects and programmes that have been implemented to tackle IWT will be needed to explore if funding is being effectively spent.

**Table 24:** Relative funding priority afforded to the countries of with most seizures of key species in IWT (from TRAFFIC seizures database)

	Origin countries	Funding position (1-79)	Transit countries	Funding position (1-79)	Destination countries	Funding position (1-79)
<b>African Elephant</b>	Nigeria	64	Belgium	0	China	7
	Guinea	55	Malaysia	25	Hong Kong	0
	Mozambique	3	UAE	0	Viet Nam	12
	Angola	24	South Africa	19	Lao PDR	10
	South Africa	19	Thailand	22	Thailand	22
<b>Pangolin</b>	Nigeria	64	Belgium	0	China	7
	Cameroon	17	India	16	Hong Kong	0
	India	16	Viet Nam	13	Viet Nam	12
	Indonesia	5	China	7	Lao PDR	10
	Malaysia	25	Thailand	22	India	16
<b>Rhino</b>	South Africa	19	South Africa	19	Viet Nam	13
	Mozambique	3	China	7	China	7
	India	16	Qatar	0	Hong Kong	0
	China	7	Hong Kong	0	South Africa	19
	Viet Nam	13	Thailand	22	India	16
<b>Tiger</b>	India	16	India	16	China	7
	Indonesia	5	Thailand	22	Indonesia	5
	Viet Nam	13	Indonesia	5	Viet Nam	13
	Thailand	22	Nepal	31	India	16
	Russian Federation	56	Viet Nam	13	Nepal	31

Key:	No funding	<\$1m funding	\$1-4m funding	\$4-10m funding	\$10-50m funding	>\$50m funding
------	------------	---------------	----------------	-----------------	------------------	----------------

**Table 25:** Relative funding priority afforded to the countries of most concern for IWT in elephants (from ETIS 2016 data) – same key as Table 24

Top 10 countries of most concern for IWT in elephants	Funding position (1-79)
China	7
Hong Kong	0
Kenya	11
Malawi	21
Malaysia	25
Singapore	79
Tanzania	1
Togo	78
Uganda	30
Vietnam	13



## 7. ROBUSTNESS OF EVIDENCE BASE



A display of seized wildlife products at the London Illegal Wildlife Trade conference held in October 2018. The fourth state-led conference in the series, it brought together around 1,300 representatives from more than 70 countries.

As noted throughout this study, the amount and type of data on progress against, and investment in, IWT is currently limited, as is reliable data on levels and trends in IWT.

### **Progress against pillars evidence**

The reports of progress against the four pillars of the state-led conferences are based on non-mandatory, non-systematic, self-assessments by governments and other interested stakeholders. They are typically descriptions of activities that have been undertaken such as law enforcement trainings, advertising and public awareness campaigns, national and regional workshops. It is often not clear who is leading or demanding certain actions for progress – e.g. whether it is NGO led or national government led. Self-assessments can also include actions that countries are planning or aspiring to achieve – such as the passing of a legal amendment or the introduction of a new law. Countries are not required to provide evidence when submitting self-assessments, so it is hard to verify reports of progress without conducting further research.

A further significant issue with the progress reports is the focus on activities and outputs rather than outcomes and impact. For example, reports of how many people attended a legal awareness training tells us little about the impact of that training on prosecution rates related to wildlife crime – or, more broadly, the effectiveness of this strategy for strengthening deterrents against IWT.

There is also a lack of consistency in reporting. Not all countries have reported after every conference, and even where they have, they haven't necessarily followed up on the previous report meaning that it is hard to track country progress since 2014. So, for example, a country may have reported after the London Conference that it is planning to revise its wildlife legislation and then this is not mentioned in subsequent reports – this means it is not possible to determine if the planned revisions took place and what they entailed. Countries appear to cherry pick activities to report on according to what they think will be perceived as progressive, rather than reflecting by commitment on what they set out to achieve in previous years (i.e. their priorities for tackling IWT), what they have achieved, as well as any associated impacts.

### **Funding evidence**

The evidence we were able to access on funding suffers from similar problems. We were only able to access publicly available and easily accessible sources of information, but this points to a key challenge – the difficulty of finding out what some donors are funding. There is no synthesis of IWT funding schemes and while some donors have publicly accessible lists or databases of projects others either keep their information well-hidden or not in the public domain at all.

For the information we were able to find, only the GEF provide access to full project documents, progress reports and evaluation reports. For the USFWS projects and IWT Challenge Fund projects we were just able to access a short summary paragraph about each project, making it hard to accurately determine which projects addressed which pillars. Ideally, we would have categorised the investments not just against pillars but also against the themes within each pillar as we have done with the progress reports but, apart from a few cases where the title or summary of a project clearly corresponds to a key pillar theme, this would not have been possible with the limited information available.

A further issue with the funding data is that different donors report investments in different ways. For project-based information such as that obtained from GEF, USFWS and IWT-CF a project agreed in say 2017 with a budget of \$1.2 million would be recorded as an investment of \$1.2 million in 2017 even though it might be a five-year project with the budget spread across those five years. For USAID, however, financial data made publicly available is recorded in terms of actual spend in a specific year not total budget. So, of our \$1.2 million project, for example, if only \$100,000 was spent in 2017 it would be recorded as a \$100,000 investment not a \$1.2 million for that particular year. Obviously this evens out over time but if a snapshot of funding is being taken at a particular time then this introduces obvious inaccuracies.

A further source of potential error is the likelihood of double counting of some funds. For example, some funds recorded by USFWS are sourced from USAID and so are recorded both in the USFWS project summaries and in the USAID report on expenditure. Double counting problems could be identified and rectified but it would require a lot of detailed insights into project portfolios and back and forth checking with programme staff to do so.

The most detailed analysis of funding is that compiled by the World Bank in 2016. But even this is subject to limitations. Firstly it has the same problem of mixing project-level total budget data and USAID-type annual spend data that we found. Secondly it omits Latin America and so does not give a global picture of how IWT funds have been distributed. Third, it does not show how funding to different countries has changed progressively year on year – only cumulative data from 2010 to mid-2016. So it is not possible to get a picture of how/whether funding to specific countries has changed in response to commitments made at the state-led conferences. It is possible that the primary data held by the World Bank would allow for such an analysis but the data is not publicly available and to date the World Bank have not done this analysis.

**IWT trends evidence**

As discussed in the previous section, there is a major problem with reliability of data on poaching trends and IWT. There is no standardised mechanism for collecting data on poaching incidents – some countries may choose to do this, e.g. South Africa releases annual rhino poaching statistics – but most don't and even of those that do record, they do not do this systematically for all species. There are some international mechanisms in place for some species – specifically the Monitoring Illegal Killing of Elephants (MIKE) programme – but this is just one species and a limited set of countries.

Seizure data is the most comprehensive in terms of species and country coverage, but, as noted by TRAFFIC, often based on media reports and so extremely biased by the type and level of media coverage.

Overall, the evidence on which this study – and other similar studies – is based is not robust. It is extremely partial, subject to bias and inconsistent. Improving the robustness of the evidence base should be a high priority if we are serious about monitoring progress in tackling IWT.





## 8. CONCLUSIONS AND RECOMMENDATIONS

A ranger with Kenya Wildlife Service records details of a container during a session to train sniffer dogs and their handlers to detect wildlife products. Mombasa sea port, Kenya.



Considerable progress has been made in tackling IWT, both in terms of actions taken by governments and other stakeholders, and resources invested. However, progress between the pillars and between the different commitments with each pillar has been uneven, as has progress by country and by region – with a noticeable gap for Latin America.

The pillar that has the most reported action, and the highest number of projects focussing on it is law enforcement. From the \$1.3 billion funding identified by the World Bank as having been allocated to IWT between 2010 and 2016, 65% was allocated to activities related to law enforcement. Similarly of the additional 450+ projects (worth \$240+ million) we identified as having been funded since 2016, law enforcement was included in 83%.

Most reported actions focussed around investing in capacity building for law enforcement officials, strengthening capacity for specialised investigations, establishing national cross-agency coordination and collaboration and strengthening regional and global enforcement networks. Major achievements have included increases in numbers and skills of rangers, roll out of SMART monitoring system in protected areas, increased deployment of canine units and technology. At the international level a major achievement has been the strengthening of ICCWC and the development and roll out of the ICCWC toolkit.

The pillar that has received the least investment of funds has been eradicating the market for illegal products, which attracted an estimated 6% of the \$1.3 billion funding identified by the World Bank and featured in 4% of the projects we identified. Despite the lack of funding, significant progress has been reported against this pillar. Most action has been taken against tightening market controls, destroying seized illegal wildlife products and raising public awareness. Major achievements reported have included closing domestic ivory markets and destroying ivory stockpiles. However, major gaps include attention to other species beyond elephants and rhinos, and tackling commitments around collaboration across the trade chain, renouncing government use of at risk species and understanding the science of, and process behind, demand reduction and behaviour change.

The pillar with the least reported actions or progress is the livelihoods and economic development pillar. Few countries have reported progress against any of the commitments and progress reports following each of the IWT conferences acknowledge that of the four pillars, this is the least implemented. A key challenge noted in the progress report following the London conference is that the London Declaration did not specify the potential to introduce legislation or related guidance for supporting sustainable livelihoods and economic development. In terms of investment of resources, 33% of the projects we identified included a focus on livelihoods – although very often coupled with law enforcement, while the World Bank study estimated that 15% of the \$1.3 billion had supported this pillar.

The vast majority of resources have been allocated to Africa. Of the World Bank estimated \$1.3 billion, 63% went toward efforts in Africa compared to 29% in Asia. Our additional analysis found 77% allocated to Africa compared to 14% to Asia and 6% to Latin America. Of the top 5 individual country recipients of funding from the World Bank study the first four were all African (Tanzania, DRC, Mozambique and Gabon) with the fifth Bangladesh. Our analysis of funds since the World Bank study identify Brazil as the top individual recipient – but this is because of its award of a large (\$13m) GEF grant in late 2016. Apart from Brazil, the list is dominated by African regional programmes and by Namibia, Tanzania, DRC and Gabon.

Our analysis of funding against “problematic” countries (countries with high levels of seizures) shows that most IWT problem countries are receiving significant funding but there are few who are not specifically Nigeria and Togo as source countries. Because we have no poaching trend data, however, we have no way of trying to draw correlations between funding trends and IWT trends. Furthermore, we have very little evidence of *impact* of the reported actions and investments, so even where we can see lots of actions reported against a particular pillar, or lots of investment of resources against a particular pillar or country, we have no way of knowing if this has translated into any reduction in IWT on the ground.

Overall, our findings show that there has been – and continues to be – a major investment of resources in tackling IWT and commitments made at the highest levels. However, it is not possible to draw conclusions as to the efficacy of these investments, or the implementation of the commitments, due to a lack of monitoring, evaluation and reporting.

Despite the commitments made at the conferences, there has been no formal requirement to monitor actions taken to meet them. The conferences – and the statements or declarations that emerge from them – do not have any formal legal status and so there is no potential mechanism for mandatory reporting. Similarly, to date, there has been no standard mechanism for monitoring progress against IWT in terms of poaching levels or other IWT indicators. At CITES CoP 17 (Johannesburg, 2016) a decision was made to introduce a new CITES illegal trade report. This would in theory be a mandatory requirement but, according to CITES “not subject to compliance procedures”. In 2017 CITES Standing Committee adopted the [Guidelines for the preparation and submission of the CITES annual illegal trade report](#). This new report will improve monitoring of levels of IWT on a country by country basis but provides no detail in terms of the four pillars of the state-led conferences.

Our first recommendation is thus to develop a standard reporting protocol that all countries could complete on an annual basis. Although efforts have been made to review progress made against the state-led conference pillars in between each conference, there is no standard format for reporting and no compulsion for countries to do so. Furthermore, countries have reported inconsistently – most countries have only reported against a limited number of commitments and there has been no consistency from progress report to progress report as to what has been reported. So, for example, a country might have reported after one conference that it was planning to introduce a new IWT strategy but in the report following the next conference no information is provided as to whether this actually happened or not – instead the country might choose completely different actions to report against.

The challenge in carrying out this recommendation will be to introduce a standardised reporting template that is not too cumbersome for countries to complete, but that also gives detail on action, effectiveness of action and progress over time, as well as giving an insight into countries’ strategies and priorities and how these may also be changing over time. This report is based on a database of reported progress and funding on a country by country basis. This database could be used as the basis for future monitoring going forward, particularly in terms of identifying geographical and thematic gaps which could benefit from further attention. Alternatively, a scorecard type tool such as the Management Effectiveness Tracking Tool for assessing progress in protected area management could be developed.

As noted in this discussion, however, monitoring would want to move on from simply reporting actions against each of the commitments to reporting on impacts. The report of progress following Hanoi does begin to take this approach but the template could be improved significantly to allow transparent monitoring of countries efforts (activities and outputs), achievements (outcomes) and impact. Additionally, it would also be useful to understand what countries have *not* been able to achieve and any cited challenges or reasons why from the countries’ perspectives.

One issue, however, would be how to incentivise reporting. Under CITES, submission of the annual IWT reports is a mandatory requirement but the conferences do not produce legally binding commitments and so reporting cannot be enforced. Linking reporting with future donor investments would potentially be a way forward in this regard but would require donor support and coordination to make this work.

Our second recommendation is to **redress the current imbalance in geographical coverage of investments**. Currently our funding analysis shows an uneven distribution of investment both geographically and thematically. This is not surprising since IWT problems are unevenly distributed. But there is no apparent correlation between need and investment. It is clear that a number of countries which have major IWT problems have rightly received major investments but other countries in need of support have received comparatively little. Our analysis shows that Latin America falls way behind Africa and Asia in terms of levels of investment. Again, this is not surprising – the majority of high value commodities involved in IWT are sourced from Africa. But Latin America is not without problems and there is a risk that these will be overlooked and will escalate. Even within Africa, funding is heavily concentrated in a few key countries with the danger that others operate “under the radar” while attention is focussed on these. Our analysis points to Nigeria, Guinea and Togo as countries that warrant further attention due to high levels of seizures but low levels of investment. Attention is also needed to “rich” destination countries including Singapore, Hong Kong and UAE. While some funding for IWT will come from Official Development Assistance funds and so these countries would not be eligible to receive it, it is clear that some form of investment (even if from domestic sources) is needed to reduce IWT in these countries.

Similarly, our third recommendation is to **redress the imbalance in thematic coverage, both in terms of investments and actions**. Our funding analysis shows a major emphasis on law enforcement and comparatively little attention to the other pillars, especially demand reduction. In terms of reported actions, again the emphasis on law enforcement is noticeable. There is more reported action against the demand reduction pillar than the level of investment would lead one to expect, but the reporting demonstrates a lack of clear strategies for reducing demand with rare mention of specific targets or of any monitoring of effectiveness. There is a clear gap in action against the livelihoods pillar. Where actions have been reported they are often activities that were already in place rather than new actions introduced specifically in response to the commitments. Even for pillars that are reasonably well reported against, attention needs to be paid to ensuring that *all* the commitments are addressed. **Much greater attention is now needed to the commitments that have to date been neglected** including:

- Reducing demand: collaborating across the illegal wildlife trade chain, renouncing government use of at risk species and understanding demand reduction and behaviour change
- Legal frameworks: tackling corruption and money-laundering including ensuring domestic legislation recognises the full range of financial crimes associated with the illegal wildlife trade.
- Law enforcement: improved cooperation between investigators and prosecutors, enhance capacity to undertake specialist investigations (e.g. financial investigations) and use specialist techniques (e.g. crime scene forensics).
- Livelihoods: far greater attention is need to ALL the commitments and especially emphasising new actions to address them.

We would advocate for.... strategic and coordinated approach to investments in tackling IWT both at the international level but also at a country or regional level. Just as Parties to the Convention on Biological Diversity produce National Biodiversity Strategies and Action Plans which highlight priority areas for investment, national/ regional IWT strategies and action plans should be encouraged in all countries. In addition,, and international conservation NGOs thatwho apply to donors for funding should be encouraged to align their proposed projects with the needs identified in those country strategies and action plans, (while retaining some flexibility to tackle new, emerging problems). The National Ivory Action Plan process that has been developed within CITES provides a potential model that could be scaled out to all species. Similarly, the ICCWC toolkit provides a useful mechanism for conducting a national assessment that couldan be used to identify key needs.





# REFERENCES

- Bwana, J (2018) Court overturns 20-year jail sentence for Faisal Mohamed convicted for ivory trafficking. *Standard*, 3 Aug 2018 <https://www.standardmedia.co.ke/article/2001290592/court-overturns-20-year-jail-sentence-for-faisal-mohamed-convicted-for-ivory-trafficking>
- CITES Secretariat (2016) *Report on the Elephant Trade Information System (ETIS)* <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-57-06-R1.pdf>
- De Dieu Blatchy et al (2018) *Analysis Of Judicial Proceedings Relating To Wildlife Offenses In The Courts Of The Republic Of The Congo (2008-2017)* Wildlife Conservation Society, Republic of Congo <http://wsccongoblog.org/wp-content/uploads/2018/08/Judicial-Study-FINAL-REPORT-19.07.2018-EN-1.pdf>
- EIA (2018) *All eyes on London: EIA recommendations for the 2018 London Illegal Wildlife Trade conference*. Environment Investigation Agency, London.
- EIA (2016) *Time for action: End the criminality and corruption fuelling wildlife crime*. Environment Investigation Agency, London.
- EIA (2015) *High Profit/Low Risk: Reversing the wildlife crime equation. A briefing for the Kasane Conference on Illegal Wildlife Trade*. Environment Investigation Agency, London.
- Emslie, R et al (2016) *African and Asian Rhinoceroses – Status, Conservation and Trade*. A report from the IUCN Species Survival Commission (IUCN SSC) African and Asian Rhino Specialist Groups and TRAFFIC to the CITES Secretariat pursuant to Resolution Conf. 9.14 (Rev. CoP15) <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-68-A5.pdf>
- European Commission (2016) *Larger than Elephants: Inputs for an EU strategic approach to wildlife conservation in Africa*. European Commission, Directorate-General for International Cooperation and Development, Brussels
- EU (2017) *EU Action Plan against wildlife trafficking: One year after – Overview of actions and initiatives taken by the EU Member States and the European Commission*. European Union, Brussels [http://ec.europa.eu/environment/cites/pdf/Achievements\\_WAP\\_overview.pdf](http://ec.europa.eu/environment/cites/pdf/Achievements_WAP_overview.pdf)
- EU (2016) *Action Plan Against Wildlife Trafficking*. European Union, Brussels [http://ec.europa.eu/environment/cites/pdf/WAP\\_EN\\_WEB.PDF](http://ec.europa.eu/environment/cites/pdf/WAP_EN_WEB.PDF)
- Roe, D and Booker, F (in press) Engaging local communities in tackling illegal wildlife trade: a synthesis of approaches and lessons for best practice. *Conservation Science and Practice*
- UK Government (2015) London Declaration on the illegal wildlife trade, review of progress. Kasane Conference on the Illegal Wildlife Trade, 25 March. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415690/review-progress-kasane-conf-150317.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415690/review-progress-kasane-conf-150317.pdf)
- UNODC (2016) *World Wildlife Crime Report: Trafficking in protected species*. United Nations Office on Drugs and Crime, Vienna.
- USAID (2017) *Biodiversity Conservation and Forestry Programs. Fiscal Year 2016. Results and Funding*. USAID, Washington DC
- Vietnam Ministry of Agriculture and Rural Development (2018) *Hanoi Conference on illegal wildlife trade – one year review of progress*. Hanoi. <http://iwthanoi.vn/one-year-report/>
- Vietnam Ministry of Agriculture and Rural Development (2016) *Hanoi Conference on illegal wildlife trade – review of progress*. Hanoi. <http://iwthanoi.vn/documents2/>
- Wilson-Holt, O (2018) *To what extent have policy commitments influenced African nations to adopt strategies that engage communities to tackle illegal wildlife trade?* MSc Thesis. Imperial College London
- Wright, E et al (2016) *Analysis of Funding to Tackle Illegal Wildlife Trade*. World Bank, Washington DC



ANNEX

Pillar	London 2014	Kasane 2015	Hanoi 2016	London 2018	Theme
1. Eradicating the market for illegal wildlife products	Support, and where appropriate undertake, effectively targeted actions to eradicate demand and supply for illegal wildlife products.	We welcome action at both national and regional levels to tighten existing international controls on the import and export of illegal wildlife products, particularly ivory.			Tightening market controls
	Endorse the action of governments which have destroyed seized wildlife products being traded illegally.				Destroy seized illegal products
	Renounce, as part of any government procurement or related activity, the use of products from species threatened with extinction.				Renouncing government use of at risk species
	Take measures to ensure that the private sector acts responsibly, to source legally any wildlife products used within their sectors; and urge the private sector to adopt zero tolerance policies on corporate gifting or accepting of species threatened with extinction or products made from them.	Strengthen our partnerships with business and others, and through regional collaboration agreements as appropriate, to reduce the demand and supply sides for wildlife products.			Engaging the private sector
	Recognising the authority of the CITES Conference of the Parties, support the existing provisions of CITES prohibiting commercial international trade in elephant ivory until the CITES Conference of the Parties determines, informed by scientific analysis, that the survival of elephants in the wild is no longer threatened by poaching.				Tightening market controls
	Welcome the action already underway and urge those governments that allow trade in legally acquired endangered wildlife products to implement measures, including labelling and wider traceability measures, to ensure that this trade does not allow any illegal wildlife products to enter these markets.				Tightening market controls
	Minimise speculation in endangered wildlife products by opposing the use of misleading, exaggerated or inaccurate information, where this could stimulate poaching, trafficking or demand.				
		Conduct and/or support research to improve understanding of market drivers, including monitoring the effectiveness of demand reduction strategies and collating a portfolio of demand reduction good practice.		Recognise the importance of research to understand market drivers so that effectiveness can be increased. Recognise the need to tailor research to specific drivers. Recognise the need for greater investment in tools, data analysis and funding. Commit to learning from these examples, sharing best practice and evaluating impact.	Understanding the science of demand reduction and behaviour change
		Strengthen, and if necessary establish, partnerships among source, transit and destination countries to combat the illegal wildlife trade along its entire chain.		We welcome increased cross-border source, transit, and destination country cooperation and other activities to address the illegal wildlife trade	Collaborating along the trade chain
		We encourage targeted national efforts (on raising public awareness) to take into careful consideration regional issues around species, consumer profiles and market dynamics, including speculation and traditional use.		We recognise the powerful impact of government-led behaviour change campaigns	Raising public awareness
2. Ensuring effective legal frameworks and deterrents	Address the problem of the illegal wildlife trade by adopting or amending legislation, as necessary, to criminalise poaching and wildlife trafficking, and related crimes including by ensuring such criminal offences are "serious crimes" within the UN Convention against Transnational Organized Crime.			We welcome action taken, in accordance with domestic law, as appropriate, to treat wildlife offences as predicate offences, including for money laundering crimes, as defined in the UN Convention against Transnational Organised Crime	Treating wildlife crime as a "serious crime"
	Address the serious problem of corruption and money-laundering facilitating wildlife trafficking and related offences by adopting or amending legislation, as necessary, criminalising corruption and bribery facilitating poaching, wildlife trafficking, and related offences.	With regard to the detection of money laundering and other financial crime in connection with the illegal wildlife trade, we will work with the Financial Action Task Force, its FATF-Style Regional Bodies, and other multilateral organisations dealing with law enforcement and financial crimes, including asset recovery networks, to put the issue of financial crime related to the illegal wildlife trade on their agendas		We will take action to strengthen anti-corruption and money-laundering activities and, where relevant, legislation as it relates to wildlife trafficking offences, including raising awareness among relevant criminal justice system professionals on the seriousness, impact and potential profits of wildlife crime. We will endeavour to share experiences and best practice in this area.	Corruption, money laundering, financial crime
	Strengthen the legal framework and facilitate law enforcement to combat the illegal wildlife trade and assist prosecution and the imposition of penalties that are an effective deterrent.				Strengthening countries' legal frameworks
	Strengthen the ability to achieve successful prosecutions and deterrent sanctions by raising awareness in the judicial sector about the seriousness, impact and potential profits of wildlife crime.				Strengthening the judiciary
	Adopt a zero tolerance policy on corruption associated with the illegal wildlife trade.			We will make strong use of the UN Convention against Corruption to prevent and combat corruption related to the illegal wildlife trade and wildlife trafficking.	Tackling corruption associated with IWT
		Review and amend national legislation as necessary and appropriate so that offences connected to the illegal wildlife trade are treated as "predicate offences", as defined in the UN Convention Against Transnational Organized Crime, for the purposes of domestic money laundering offences, and are actionable under domestic proceeds of crime legislation.	We call upon governments to adopt legislation identifying illegal trade in protected species of wild flora and fauna involving organized criminal groups as a serious crime, in accordance with their national legislation and Article 2(4) of the UN Convention against Transnational Organized Crime.		Treating wildlife crime as a "serious crime
		Ensure that relevant prosecutors, judges, Financial Intelligence Units, and authorities engaged in law enforcement, have the resources, knowledge and capacity effectively to investigate and prosecute financial crimes associated with wildlife crime.		We will increase action to tackle the illicit financial flows associated with wildlife trafficking and related corruption, including the increase of use of financial investigation techniques and public/private collaboration to identify criminals and their networks.	Tackling financial crime associated with IWT
		We will increase international and regional cooperation to ensure an enhanced focus on financial crime investigations and prosecutions for wildlife crime.			Tackling financial crime associated with IWT
	Invest in capacity building to strengthen law enforcement to protect key populations of species threatened by poaching.			We recognise the importance of capacity building for wildlife management departments	Investing in capacity building for law enforcement officials
	Establish and maintain national cross-agency mechanisms to develop, resource and implement coordinated national and local action plans and strategies.			We will harness technology and share and scale-up successful and innovative solutions.	Strengthening capacity for specialised investigations
3. Strengthening law enforcement efforts	Provide the necessary conditions for, and further support, including through international co-operation to share expertise, the use of the full range of investigative techniques and tools already deployed against other forms of domestic and transnational organised crime.				Strengthening capacity for specialised investigations
	Strengthen cross-border and regional co-operation, through better co-ordination, and through full support for regional wildlife law enforcement networks.	Support the strengthening and, if necessary, the establishment of regional wildlife enforcement networks,	We encourage countries, regions, and sub-regions to pursue similar cross disciplinary collaborations in the fight against illegal wildlife trade.		Strengthening regional and global enforcement networks
		Strengthen the International Consortium on Combating Wildlife Crime (ICWC) to ensure that ICWC takes a leading role in providing coordinated global support to the law enforcement community, including enhancing enforcement capacities at national, regional and international levels.	We welcome the ongoing support from the International Consortium on Combating Wildlife Crime (ICWC) <sup>1</sup> for governments to strengthen their criminal justice systems and enhance enforcement capacities and call for those countries that have undergone an ICWC Toolkit assessment to implement recommendations.		Strengthening the International Consortium on Combating Wildlife Crime (ICWC)
		Support existing, and, if necessary, the establishment of new, global and regional networks of prosecutors responsible for prosecuting offences involving organised crime as it relates to the illegal wildlife trade.			Strengthening regional and global enforcement networks
		Engage with the transport industry within our countries to raise awareness of the role they can play. (Eg support the development and implementation of industry-wide protocols and/ or guidelines by the logistics and transportation sector on strengthening due diligence and other measures to eliminate the illegal trade in wildlife)	We urge other business sectors that could be exploited by criminals involved in the illegal wildlife trade to follow the example set by the transport sector. We call upon governments to strengthen engagement with the private sector.	We will build and strengthen sustainable, long-term partnerships to change incentives for those involved in the illegal wildlife trade.	Engaging the private sector
			We therefore encourage the international community to promote the work of rangers and strengthen human and material resources.		Build capacity for law enforcement/rangers
			We need to ensure that central authorities for international crime cooperation are sufficiently resourced and empowered to respond to, and action, requests for extradition and mutual legal assistance efficiently.		Investing in capacity building for law enforcement officials
	Recognise the negative impact of illegal wildlife trade on sustainable livelihoods and economic development.		We underline that measures implemented to address illegal trade should not negatively impact upon legal trade in wildlife.	It is important to highlight the impact of the illegal wildlife trade on the sustainable livelihoods of communities, and the importance of countries' obligations to uphold agreements made with indigenous and local communities	Tackling negative impacts of IWT
	Increase capacity of local communities to pursue sustainable livelihood opportunities and eradicate poverty			We will work to support sustainable livelihoods which provide an alternative to engagement in the illegal wildlife trade.	Supporting sustainable livelihood opportunities
	Initiate or strengthen collaborative partnerships among local, regional, national and international development and conservation agencies to enhance support for community led wildlife conservation.	Support work by countries and intergovernmental organisations, as well as nongovernmental organisations, that seeks to identify the situations where, and the mechanisms by which, actions at the local level, including with community groups, can reduce the illegal wildlife trade.		We recognise the essential engagement role and rights of local communities and indigenous people to ensure a sustainable solution to addressing the illegal wildlife trade. We also recognise the importance of local communities acknowledging the value of protected species and habitats, and the benefit this value can bring.	Supporting community led conservation
4. Sustainable livelihoods and economic development	Work with, and include local communities in, establishing monitoring and law enforcement networks in areas surrounding wildlife.		The active participation of local people is critical to effective monitoring and law enforcement as well as sustainable socio-economic development.		Involving local people as law enforcement partners
		Promote the retention of benefits from wildlife resources by local people where they have traditional and/or legal rights over these resources (e.g. – strengthen policy and legislative frameworks, reinforce the voice of local people, and implement measures which balance the need to tackle the illegal wildlife trade with the needs of communities).	Sustainable livelihoods are most likely to be secured with the engagement of relevant community groups and the appropriate retention of benefits from wildlife for local people surrounding protected areas.		Supporting wildlife-based livelihoods/ benefits
		Establish, facilitate and support information-sharing mechanisms, within country, regionally, and internationally, designed with, for and targeted at local people and practitioners, to develop knowledge, expertise and best practice in practical experience of involving local people in managing wildlife resources, and in action to tackle the illegal wildlife trade.			Supporting information sharing about community-based approaches
		Support work done in countries to address the challenges that people, in particular rural populations, can face in living with wildlife, with the goal of building conservation constituencies and promoting sustainable development.			Reducing the costs of living with wildlife





WWF® MORE THAN WORDS: ARE COMMITMENTS TO TACKLE ILLEGAL WILDLIFE TRADE BEING MET?

WWF.ORG.UK

FRONT COVER, © WWF-CANON / JAMES MORGAN  
BACK COVER, © RICHARD BARRETT / WWF-UK



For a future where people and nature thrive | [wwf.org.uk](http://wwf.org.uk)

© 1986 panda symbol and ® "WWF" Registered Trademark of WWF. WWF-UK registered charity (1081247) and in Scotland (SC039593). A company limited by guarantee (4016725)