

# National Wildlife Crime Unit (NWCU)

## THE INITIAL RISK ASSESSMENT OF THE ILLEGAL WILDLIFE TRADE WITHIN THE UK



uk | **National Wildlife  
Crime Unit**

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**Contents**

Introduction ..... 2

Aims & Objectives ..... 3

Methodology..... 3

Executive Summary..... 4

Recommendations ..... 5

Key Deliverables..... 7

Illegal Wildlife Trade (IWT) ..... 8

Illicit Finances Linked to Illegal Wildlife Trade ..... 16

Cyber enabled Illegal Wildlife Trade ..... 18

Organised Crime Groups (OCG) Linked to Illegal Wildlife Trade ..... 21

Appendix A – Glossary of terms..... 23

## Introduction

In June 2021, the G7 leaders have agreed commitments to halt and reverse biodiversity loss by 2030, and tackle deforestation, marine litter and illegal wildlife trade (IWT).

At the G7 Leaders' Summit in Cornwall, countries have come together and agreed a shared G7 Nature Compact. This is a key agreement which brings G7 countries together to address the most pressing international and interlinked challenges of biodiversity loss and climate change. Leaders have also agreed to review progress against the Nature Compact to ensure delivery of its 2030 vision.

The G7 Nature Compact commits world leaders to:

Shift incentives and use all appropriate levers to address unsustainable and illegal activities negatively impacting nature, such as through tackling deforestation by supporting sustainable supply chains, and stepping up efforts to tackle the illegal wildlife trade

- ✎ Work to dramatically increase investment in nature from all sources, and to ensure nature is accounted for in economic and financial decision-making - for instance, through drawing on the Dasgupta Review for key actions
- ✎ Support and drive the protection, conservation and restoration of ecosystems critical to halt and reverse biodiversity loss and tackle climate change, such as supporting the target to conserve or protect at least 30% of global land and at least 30% of the global ocean by the end of the decade
- ✎ Hold themselves to account for taking domestic and global action for nature through driving strengthened accountability and implementation mechanisms of all Multilateral Environmental Agreements to which we are parties<sup>1</sup>

In light of this the Home Office commissioned the National Wildlife Crime Unit (NWCUC) to produce the first ever illegal wildlife trade risk assessment.

There has been additional funding provided to the NWCUC, specifically for tackling illegal wildlife trade. This is being used to recruit a financial investigator, intelligence analyst, intelligence officer and an admin assistant.

On behalf of the UK and devolved UK Governments, the NWCUC, through a high level group known as the UK Tasking & Coordinating Group (UKTCG) produces intelligence products which include a UK Strategic Assessment on wildlife crime. NWCUC use a MoRiLE (Management of Risk in Law Enforcement) assessment to measure and identify the wildlife crime areas that pose the highest risk. The highest risk areas are then set as priorities and they are taken forward via a Priority Delivery Group (PDG). The UKTCG can review and amend the priorities at any time, but they are formally reviewed every third year.

The Convention on International Trade in Endangered Species (CITES) of Wild Fauna and Flora is one of the PDG's.

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<sup>1</sup> G7 Nature Compact report - [Government sets out commitments to biodiversity and sustainability in G7 Nature Compact - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97422/g7-nature-compact-report-2021.pdf)

## Aims & Objectives

- ✔ To examine the current picture of the illegal wildlife trade within the UK - and globally - to outline the most prominent risks.
- ✔ To outline the most common species of Flora & Fauna that are most at risk of IWT.
- ✔ To provide strategic recommendations for the wildlife crime enforcement family.
- ✔ To determine realistic key deliverables for the NWCUC.
- ✔ To include strategic recommendations within the National Police Chiefs Council (NPCC) wildlife crime strategy.

Enforcement and regular review periods will be scheduled in to ensure that any changes in risk are identified, captured and raised, along with any new recommendations and key deliverables.

A finalised Risk Assessment, along with results analysis, will conclude the project in 2025.

## Methodology

The following products & systems have been utilised:

- ✔ RUSI (Royal United Services Institute) report on illegal wildlife trade and illicit finance in the UK – January 2022
- ✔ Border Force Strategic assessment
- ✔ Police systems; Police National Database (PND) & Police National Computer (PNC)
- ✔ Wildlife Intelligence Database (WID)
- ✔ Reports produced by the TRAFFIC Organisation
- ✔ Open Source research
- ✔ Trends in UK CITES Plant Trade RBG Kew Horizon Scan for the National Wildlife Crime Unit May 2022
- ✔ NWCUC website
- ✔ Cybercrime Priority Delivery Group (PDG) Lead

NWCUC used a MoRiLE (Management of Risk in Law Enforcement) assessment to measure and identify the wildlife crime areas that pose the highest risk within IWT. MoRiLE works in conjunction with the National Intelligence Model (NIM) and current tasking structures. At a strategic level MoRiLE can assist in identifying strategic priorities by being incorporated into the strategic assessment process. At a tactical level MoRiLE can assist in identifying priorities on a daily, weekly, fortnightly or monthly basis providing a greater understanding of the risks presented to law enforcement in their tactical work and aiding interoperability between agencies.

MoRiLE can also assist law enforcement in responding to the Strategic Policing Requirement by assessing whether there is sufficient capacity and capability to meet the national policing requirements.

MoRiLE is a tool to enable law enforcement agencies to understand their tactical risks and should be incorporated within the tactical tasking and co-ordination process: with all law enforcement agencies in the UK using the MoRiLE process it will be possible to establish a national picture of risk.

The key features of the MoRiLE process are:

1. Prioritisation of resources through a transparent and informed decision making process.
2. Assessment of a range of tactical threats areas alongside each other.
3. Assessment of capability and capacity in relation to each threat.

4. Avoidance of bias in risk assessment.
5. Use of a common language in relation to risk.
6. A clear process that is easy to use and understand.

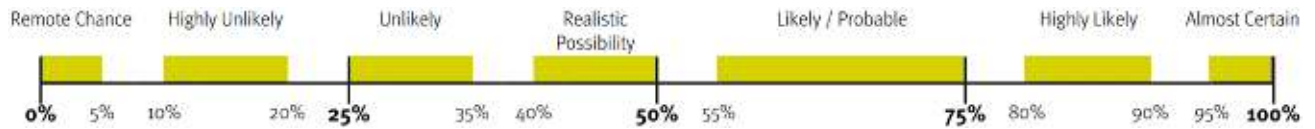
The MoRiLE assessment evidence utilises available and suitable data sources and includes but not limited to; the NWCU Wildlife Intelligence Database (WID), PND in addition to information/data from law enforcement. The NWCU team were involved in the moderation process to add context to the rationale before assessment and scores are ratified.

MoRiLE scores are calculated across three areas:

- ✔ **Impact and Harm** (victim, community and environment)
- ✔ **Likelihood** (frequency, volume, trend and forecast)
- ✔ **Organisational Position** (public interest, reputation and politics, economic cost, capacity and capability)

**Probability & Confidence**

Throughout the assessment the ‘probability yardstick’ utilised by other agencies will be used to ensure consistency when assessing probability across different priority areas. The following defines the probability ranges when such language is used and the table details the confidence level of statements.



Confidence Statement	
Language	Evidence
<b>High Confidence</b>	Good quality and/or corroborated from a range of different sources, or situations where it is possible to make a clear judgement.
<b>Moderate Confidence</b>	Open to various interpretations, or credible and plausible but lacks corroboration.
<b>Low Confidence</b>	Scant or very fragmented, and/or based on sources of suspect reliability.

**Executive Summary**

The illegal wildlife trade (IWT) has been identified as the fourth largest illegal trade behind drugs, people smuggling and counterfeiting<sup>2</sup>. The cost of illegal wildlife trade is estimated to generate around £17 billion per year and is concealed within the legitimate industry (however this is likely to be an underestimate).

The most prominent risk is the lack of intelligence being received around the illegal wildlife trade. The current picture remains largely unknown as are the number of organised crime groups linked to the trade [**High Confidence**].

Limited intelligence/offences are indicative of the general lack of awareness on a global level across law enforcement, partnership agencies and members of the public. It is consistently highlighted as a common theme that the illegal wildlife trade is not seen as a priority for UK Police Forces [**High Confidence**].

<sup>2</sup> Provided by the UNODC – United Nations Office on Drugs & Crime



The illegal wildlife trade is a criminal and anti-money laundering issue and this needs to be recognised as a serious financial crime.

Intelligence indicates that some individuals are using their legitimate businesses to commit illegal trade [**Moderate Confidence**].

The principal driver for individuals to commit illegal wildlife trade offences is due to the high return low risk element. Offenders continue to commit criminal activities as they do not often lead to prosecution. When prosecutions do occur, typically they result in low-level fines or short term custodial sentences [**High Confidence**].

Albeit limited, successful completed POCA investigations have instilled harsher penalties for offenders - an increase in POCA investigations may act as a deterrent.

Financial intelligence is key as there is always source, transit and destination countries, involved in these crimes. IWT knows no borders and therefore communication and valuable, reliable information sharing is crucial, not only between law enforcement and partnership agencies, but also between Countries [**High Confidence**].

Communications between not only UK law enforcement and partners, but between Countries is key with regards to tackling the illegal wildlife trade.

In respect of commodities, to date European eel and Raptors present the highest risk [**High Confidence**].

Although Timber has been identified as one of the largest commodities of import, it has been assessed that the illegal trade of timber is predominantly being managed at the border. Therefore this particular trade does not appear to impose a wider risk to the UK at this time [**High Confidence**].

Individuals linked to the illegal wildlife trade are utilising the internet to facilitate and engage in wildlife crime. It has been determined that the majority of cyber enabled trade takes place on open source popular market places and/or social media, as this type of criminality is largely unpoliced. It has been noted that proactive policing targeting offenders trading on the open platforms, may cause a displacement in offending, forcing criminals to the dark web [**Moderate Confidence**].

There is one mapped Organised Crime Group (OCG) recorded with the primary threat of illegal wildlife trade [**High Confidence**]. This network were involved in the illegal trade of raptors, after it was identified that wild taken birds were being exported to the Middle East. Further intelligence is required around this network to ascertain whether this group are still active.

Initial analysis suggests that there are further potential networks operating within the illegal trade of European eel and Raptors. Further development needs to be made before these groups can be assessed for OCG mapping [**Moderate Confidence**].

Analysis needs to be conducted around mapped groups recorded with a serious and organised crime primary threat, in order to identify any links to IWT. It is acknowledged that there will be criminality crossovers [**Moderate Confidence**].

## Recommendations

- ✔ To implement recommendations within the **2022/2025** strategy for UK Policing to tackle IWT.
- ✔ To identify and understand the links between IWT and serious and organised crime.
- ✔ To evidence the value of incorporating financial and cyber resources within IWT investigations and raise awareness of IWT offences within cyber and economic crime units.
- ✔ Law enforcement and partnership agencies to raise awareness of CITES and IWT across the UK.

## OFFICIAL SENSITIVE: POLICE AND PARTNERS

- ✔ To assess the opportunities that the legal trade provide to the illegal trade, and to identify the correlation and crossover points to criminality.
- ✔ To encourage greater target focused intelligence sharing and partnership working between law enforcement and non-government enforcement agencies.
- ✔ To maximise the police / private sector partnership aiming to increase problem focused intelligence exchange from financial institutions. To incorporate financial intelligence to bridge intelligence gaps, identify parallel intelligence opportunities and drive proactive policing.
- ✔ To provide assistance and a glossary of keyword searches to ensure that appropriate intelligence is consistently collated.
- ✔ To share the glossary of keyword searches with the banking sector, to increase the reporting of financial intelligence linked to IWT.
- ✔ To provide ongoing training for Policing UK, key partners, banking sectors and money service businesses who facilitate international fund transfers on IWT.
- ✔ To establish an enforcement agency intelligence group (NWCUC / Police / BF / Banking / ROCU).
- ✔ NWCUC to work with Border Force to complete a problem profile for each CITES priority theme.
- ✔ To conduct financial investigations and develop financial analysis to help understand money flows, identify prolific offenders and any potential networks. The recruitment of the financial investigator within the NWCUC will significantly assist with this.
- ✔ To maximise Police and Private sector relations locally, nationally and internationally.
- ✔ NWCUC and CITES Priority Delivery Group (PDG) to link in with the Cyber PDG lead and the Durrell Institute of Conservation & Ecology (DICE) to consider implementing regular, proactive open source research with a view to identify offenders/companies involved in the online trade of CITES, as well as new methods and trends.
- ✔ To promote the seizure and investigation of mobile phones when individuals are arrested for IWT offences, this may assist investigations, by identifying methods and tactics used by offenders, cross border criminality, identifying new locations, new offenders, and confirming criminal associations.
- ✔ It is recommended that awareness of the “CyberDigiTools” application is promoted across the PWCO network.
- ✔ NWCUC and law enforcement to develop intelligence with a view to identifying any IWT OCGs operating within the UK.
- ✔ NWCUC and law enforcement to enhance intelligence on existing OCGs.
- ✔ For illegal wildlife trade to be added to the OCG tracker as a primary, secondary and tertiary threat.
- ✔ Assessment of national OCG mapping data needs to be made to understand how many Serious and Organised mapped OCGs are also committing IWT.

## OFFICIAL SENSITIVE: POLICE AND PARTNERS

- ✔ To ensure that liaison with the relevant countries is made when identifying foreign national offenders and criminal links to other countries.
- ✔ Home Office to consider including the illegal wildlife trade within the Serious and Organised Crime Strategy so that such offences and intelligence can be captured, investigated and managed more effectively by Police Forces and partners.

### Key Deliverables

- ✔ To provide assistance with keyword searches to ensure that appropriate intelligence is collated.
- ✔ To provide ongoing training for Policing UK, key partners and also banking sectors on IWT.
- ✔ To establish an enforcement agency intelligence group (NWCUC / Police / BF / Banking / ROCU).
- ✔ NWCUC and Law enforcement to develop intelligence with a view to identifying and mapping IWT OCGs operating within the UK.
- ✔ For illegal wildlife trade to be added to the OCG tracker as a primary, secondary and tertiary threat.
- ✔ To ensure that liaison with the relevant countries is made when identifying foreign national offenders and criminal links to other countries.
- ✔ To establish working groups to tackle key issues within the main priority areas.



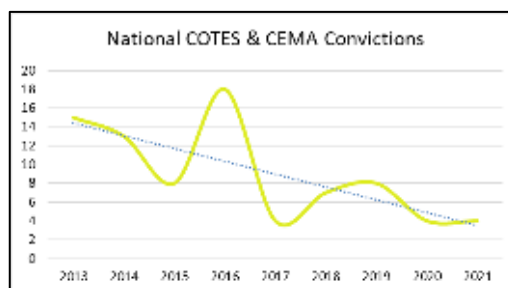
### Illegal Wildlife Trade (IWT)

International trade in wildlife is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); an international agreement between governments that aims to ensure that international trade in wild animals and plants does not threaten their survival. CITES lists more than 35,000 species in Appendices, according to the degree of protection they need. Individual governments are responsible for implementation of the convention.

In the UK, Defra (Department for Environment, Food & Rural Agency), through its executive agency APHA (Animal and Plant Health Agency), is the CITES management authority. The convention is implemented through Control of Trade in Endangered Species Regulations 2018, (COTES). Defra is advised by the scientific authorities, Royal Botanic Gardens Kew for plant matters and Joint Nature Conservation Committee (JNCC) for animal matters. APHA provides policy advice to the government on CITES and wildlife enforcement issues. It also issues import/export permits for species listed on the appendices of CITES and the annexes to the UK wildlife trade regulations as well as permits allowing commercial use of Annex A specimens (Article 10 certificates).

The Convention is implemented through COTES (Enforcement) Regulations 2018. The police have primary responsibility for enforcing the provisions of COTES. UK Border Force has primary responsibility for enforcing offences relating to imports and exports of wildlife at the border contrary to the provisions of the Customs and Excise Management Act (CEMA) 1979r. Other domestic legislation such as the Wildlife and Countryside Act 1981 play their part when offences relate to impact on UK species.

The adjacent chart highlights the number of COTES and CEMA convictions for the UK since 2013:



COTES and CEMA conviction levels have not exceeded those seen in 2016. Low levels have remained static over the last 2 consecutive years, which may be indicative of the fact that wildlife crime, including CITES is not a current priority for Police forces. Another aggravating factor is the impact of Covid-19 restrictions on IWT and COTES/CEMA convictions.

The UK continues to be linked to the import and export of illegal wildlife products, and has also been identified as a source country for some species (e.g. live raptors for the falconry trade and European eels for the Asian consumer market). The UK is also a transit and consumer market for a large number of CITES species.

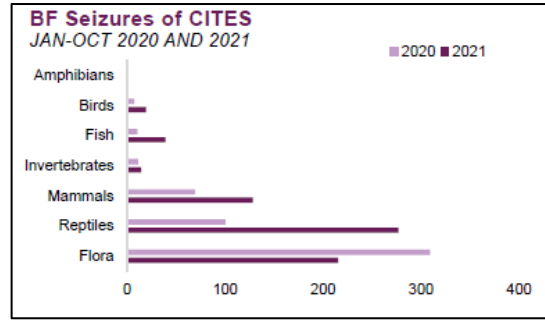
The adjacent chart shows an overall decreasing trend in IWT reports since 2015. The lowest levels were seen in 2020 with around 13 submissions per month. If the recording of intelligence and incidents continue at this rate then it is anticipated that there will be a decrease in levels during 2022.



Consistently low levels are due to blockages within intelligence sharing between both law enforcement and partnership agencies.



CITES seizures conducted by Border Force saw an overall rise in 2021, when compared with 2020. It is likely that the increase is due to the easing of Covid-19 restrictions. The adjacent chart illustrates that Flora seizures are the only products to see a reduction.



There are numerous different themes that fall under the CITES umbrella, all of which present their own unique issues and key threats. To ensure that these themes are assessed appropriately, key themes have been looked at in isolation within the NWCU's MoRiLE scoring exercise for the Strategic assessment. The highest threats have been highlighted below:

Thematic Area	Risk Score	Organisational Risk Indicator
IWT European Eel ( <i>Anguilla anguilla</i> )	104	4
IWT Raptors	24.75	4
IWT Timber	24	4
IWT Reptiles	19.25	4
IWT Beauty, Health & Medicines	16.25	4
IWT Taxidermy inc Skulls	15.75	4
IWT Ivory	8.75	5

In terms of risk score, the illegal trade of European eel currently poses the highest risk and is significantly higher than any of the other CITES themes. The physical and psychological victim score has been assessed as low; with there being some evidence of intimidation and assault tactics being committed by individuals involved in the trade. The financial impact has been determined as moderate, due to the high volumes of illicit cash being made by offenders, which naturally has an impact on the economy and legitimate businesses. The Community risk has been assessed as severe and the environmental risk as critical. European eel trafficking is one of the most devastating crimes against wildlife worldwide, with populations seeing a decrease of 90% in recent years.

With the exception of ivory and rhino horn all of the CITES themes have an ORI score of 4. This indicates that there are capability and capacity issues, largely due to the fact that illegal wildlife trade is not a control strategy or priority area within law enforcement agencies. Ivory and Rhino horn ORI score currently sits at a 5, due to the fact that the public interest category has been assessed as moderate. The ivory trade is a well-publicised and emotive, whereas the other thematic areas are less understood and therefore carry a lower impact within public interest.

The key threat areas are discussed in more detail below:

**European eel (*Anguilla Anguilla*) Trade - CITES Priority – HIGH RISK**

The current impact of the UK leaving the EU remains unknown. Prior to the UK leaving the European Union, there was unrestricted movement within the EU, whereas now any trade and restocking of eels requires a permit. The Covid-19 pandemic appears to have delayed the evaluation of these regulation changes.



## OFFICIAL SENSITIVE: POLICE AND PARTNERS

The illegal trading of European eels is an extremely lucrative business. The illegal global trade in eels is worth up to £2.5 billion each year. Operation LAKE is the European operation that has been adopted to try and tackle this trade.

European eels are fished from 4 main Countries; Spain, Portugal, France and the United Kingdom. Once caught the eels are held for approximately 24 hours before being smuggled to Asia. The eels are then transported to fish farms within China and are left to grow for approximately 6 to 7 years. After this time period the eels are harvested and then distributed to Asia, North America and Europe [**High Confidence**].

European eel fishing takes place on the tidal sections of rivers on the west coast of the UK. The vast majority of the fishing takes place on the River Parrett in Bridgewater, Somerset, and the River Severn in Gloucester, with small scale fishing on the River Wye in Gwent. There are a handful of fishermen who operate on rivers in Devon and on the Rivers Ribble, Lune and Dee. There are around 500 licensed fishermen in total, with a large proportion operating around Bridgewater and Gloucester. Elvers are also found in a number of other rivers in the UK, albeit in smaller numbers, although there are no licenses issued for elver fishing on any of these rivers [**High Confidence**].

The licensed UK elver fishing season is between February and May each year [**High Confidence**]. However during this season the question has been raised that potential illegal fishing has been conducted due to the significantly large weigh in's during the first week of the season. This is not yet corroborated and another potential factor for this, is that elvermen have pooled catches together for a higher return, or they have weighed in tanked eels (which is also illegal) [**Low Confidence**]. Stricter measures need to be implemented around high volume weigh in's in order to try and determine where the stock has originated from. If any breaches or illegal activity is identified then penalties must be given as a deterrent.

Elvermen fish from the river bank. The use of trawlers and fixed nets are prohibited so only hand held nets must be used. The Eels are then transported to a storage facility, where they are kept for approximately 24 to 36 hours. Following this settling period the eels are then smuggled out of the UK [**Moderate Confidence**]. Historically eels have been concealed within passenger suitcases and cargo holds. However, there is insufficient evidence to support this method within seizure data and therefore the current trafficking methods are an intelligence gap. Private flights and transportation in lorries and vans is also a known method for criminals, as well as mis-declaration of the eels (e.g. declaring them as fish bait).

In respect of potential networks there have been three separate groups identified, all of which are interlinked with crossover members being identified within all 3 groups. Intelligence suggests that these nominals have traded high quantities of eels, indicating that they must each have some form of work force. Although the details around potential networks are extremely limited, it is likely that nominals operating with/under these groups are fairly fluid. Further development needs to be made to corroborate this [**Moderate Confidence**].

Intelligence indicates that some offenders are exploiting their legal businesses to trade illegally. Some businesses have applied for permits for purchasing European eel despite having no digital footprint. However these companies do not breach the current guidance regulations and therefore are granted permits without the reassurance that eels are being obtained legitimately for restocking [**Moderate Confidence**].

Illegal Trade in Raptors - CITES Priority – HIGH RISK

The last strategic period raised the illegal trade of raptors as a CITES priority issue. It was acknowledged that data barriers and issues within recording processes resulted in a true reflection of the trade not being captured. A continuation of these blockages has ensured that the significant intelligence gaps and scale of this theme remain largely undetermined **[High Confidence]**. The illegal trade in falcons, particularly peregrines continues to be driven by a demand within the Middle East and the desire to have birds from wild stock **[Moderate Confidence]**. There is one mapped OCG recorded with the primary threat of illegal wildlife trade **[High Confidence]**. This network were involved in the illegal trade of raptors, after it was identified that wild taken birds were being exported to the Middle East. Further intelligence is required around this network to ascertain whether this group are still active.

Currently, the volume of supply is potentially causing a glut in the legal market, which may result in a decrease in the sale value of birds **[Low Confidence]**. However, the combination of the on-going demand for raptors and the weaknesses within the CITES certification and bird registration schemes will likely lead to the continuation of illegal trade **[Moderate Confidence]**. Although this is a national issue, in respect of priority locations, offences are relatively sporadic.

There are around 51 nominals linked to the illegal trade, however further development needs to be made to establish the scale and severity of their involvement. Some individuals may be highlighted due to administrative issues, and not necessarily because of criminal intent. The following key themes have been identified within the illegal trade:



Of note are two active operations; Operation STOOP and TANTALLON, which both relate to the theft and trade of peregrines. Operation TANTALLON has highlighted that the targeting of eggs from Scottish nests has impacted on breeding success. It is reasonable to suggest that this issue is replicated across Britain **[Moderate Confidence]**. This has been corroborated within the methods used by prolific offender Jeffrey LENDRUM<sup>3</sup>. The investigation into LENDRUM evidenced that he had been targeting Peregrine nest sites in the South Wales Valleys. It was suspected that this had been ongoing for a

<sup>3</sup> 'Pablo Escobar of eggs' [The Guardian]

number of years. This tactic may have a large impact on a species that is in a recovery period (Peregrine Falcon).

### Timber - CITES Priority – Medium Risk

During the last strategic period it was agreed that timber would remain a priority, but the Wildlife Crime Conservation Advisory Group (WCCAG) determined that there would be a focus on Rosewoods and Aquilaria. Timber products have seen a significant rise in seizures from 2020 to 2021, particularly for agarwood [**High Confidence**]. The theme of smaller timber products - typically relating to musical instruments - has continued within this reporting period. It has been assessed that high volume imports of timber are being identified and managed appropriately at the border [**Moderate Confidence**]. In light of this, whilst it is recognised there is a demand for timber within the UK, this is a current priority for Border Force, this does not currently represent a priority for UK policing or the NWCUC.

### Reptiles - CITES Priority – Medium Risk

The import of reptiles into the UK are for both personal and commercial purposes. The personal demand surrounds individuals purchasing live reptiles as pets and accounts for 4% of reptile seizures. Commercial trade surrounds the import of derivatives and reptile parts and has three main strands; collectors (mainly skulls and shells), Beauty & Health (including herbal medicines), and the main consumer demand; fashion. Not only have reptile seizures accounted for the highest proportion of overall CITES seizures, they usually relate to bulk seizures rather than one or two units being trafficked at one time [**High Confidence**].

Changes within the regulations surrounding the trade in reptiles changed once the UK left the EU. The effect of this has potentially been delayed due to Covid-19 and therefore the true scale and picture cannot be determined. It is anticipated that there will be a greater understanding during the next strategic assessment.



Covid-19 had a significant impact on the illegal live reptile trade for three main reasons; firstly the highest proportion of live trade is conducted at Reptile fairs, the most popular being Haam in Germany. Covid-19 restrictions meant that such events did not take place. The transportation of live reptiles between the EU and the UK is via the Channel - very few hobbyists would consider flying with smuggled reptiles due to airport scrutiny. Secondly, the financial implications of Covid-19, were that people could not afford to purchase the animals; particularly hobbyists and collectors. Thirdly, the cancellation of international flights; the flights that were taking place were being prioritised for PPE and didn't have the space for livestock. It is anticipated that due to the relaxation of Covid-19 restrictions reptile trading /seizures will now rise [**Moderate Confidence**].

The illegal trade of live reptiles, parts and derivatives has also been linked to cybercrime, with the sale of reptiles on internet market places becoming increasingly more common. However due to the complexities of cyber enabled crime, the true scale is currently undetermined [**High Confidence**].

### Beauty, Health & Medicines - CITES Priority – Low Risk

Both Flora and Fauna derivatives continue to be seen within medicines, health and beauty products. It is currently unknown what environmental impact this has on the UK, and it is acknowledged that this is part of a wider global issue [**Moderate Confidence**]. The UK is an importing country of Beauty,



Health and Medicines, with medicinal products originating from Thailand and China being most common<sup>4</sup> **[Moderate Confidence]**. However it is noted that products are being imported from other Asian countries such as India.

A key health threat identified for buyers and consumers of medicinal and health products is that these are not being regulated. Therefore the potential risks to consuming these products are unknown **[Low Confidence]**. Anecdotally it has been raised that larger businesses are potentially not being regulated and therefore there may be issues with some of their products containing CITES ingredients **[Low Confidence]**.

Beauty products have become an increasingly important issue especially high-end cosmetics containing caviar and sturgeon oil. These are the most seized caviar item by Border Force<sup>5</sup>. The intelligence picture around this sub category remains largely unknown due to the lack of intelligence. Partnership data is crucial in order to gain a better understanding of the current picture across the UK **[High Confidence]**.

### Illegal Trade in Taxidermy (including skulls) – CITES Non-Priority - Low Risk

Links to cybercrime, with online social and marketing platforms are being utilised to advertise and sell products. Intelligence and seizures currently suggest that skulls are typically imported in bulk, but then sold on individually.

A risk identified, albeit seen within historical data, is that some species parts/skulls are not being treated before entering the UK. Primate skulls being a specific issue, with some flesh still remaining on the bones. This highlights a potential threat of zoonotic diseases being brought into and then transmitted within the UK.

In respect of offenders, repeat offender Arron HALSTEAD; a taxidermy dealer was sentenced to 56 weeks in custody in August 2020. HALSTEAD was the first person in the UK to be imprisoned twice for offences under the COTES regulations. The sentence was the result of complex two-and-a-half-year investigation by NWCU and Lancashire Police. Arron HALSTEAD had been offering to sell a black rhino skull, a sawfish rostrum and a sperm whale tooth without the required permits. HALSTEAD was well aware that permits were required and was attempting to sell the items undetected. HALSTEAD pleaded guilty to six offences contrary to the Control of Trade in Endangered Species (Enforcement) 1997. These related to the prohibited trade in Tiger skulls, Elephant tusks and Rhino horns – some of the world’s most critically endangered species. This was the third occasion that this offender had come to the attention of the Police and the NWCU. Prior to this in 2015 Halstead was given a 24-week prison sentence for the prohibited trade in endangered species.



During this reporting period a Confiscation investigation has been completed around HALSTEAD. This resulted in a benefit figure of £99,137.32, with a confiscation order imposed of £71,489.40. This has to be paid within 3 months or HALSTEAD risks a further 14 months imprisonment default. HALSTEAD has also been issued with a Serious Crime Prevention Order (SCPO).

### Ivory - CITES Priority - LOW

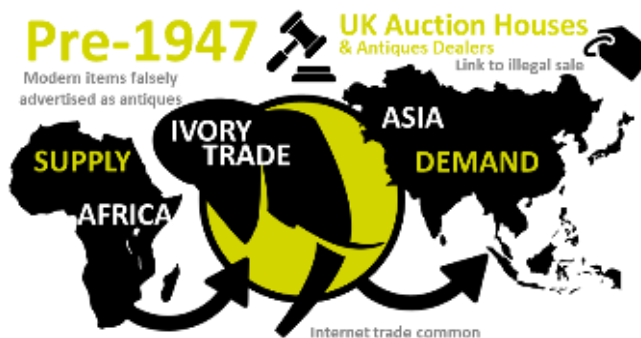
Africa continues to be the key source country for raw ivory. The demand for ivory in Asia is one of the most important drivers for high levels of elephant poaching and ivory trafficking. Intelligence levels

<sup>4</sup> Border Force Strategic Assessment 2022

<sup>5</sup> WCCAG Recommendations to UKTCG on CITES Conservation Priorities - 2022

surrounding Ivory continue to be limited, but the threat to the UK from the wider trade continues to be low **[Moderate Confidence]**.

The internet trade is a common method of advertising and distributing ivory, with a significant number of purchases being shipped to China unregulated. Some sellers utilise the postal system for this, and are not applying for the relevant permits. Therefore there is the potential for more modern items being falsely advertised as antiques (prior to 1947) **[Moderate Confidence]**. The illegal wildlife trade is low risk, high reward, with the illegal trade in ivory being no exception. Conducting financial investigations and following the money flows may assist in significant seizures and act as a deterrent for criminals.



Historical intelligence indicated that a Chinese run shipping agent was operating around the Heathrow area. The company were buying a lot of ivory via online selling platforms such as eBay. The tentative hypothesis was that the company were consolidating stocks which were then potentially being shipped in bulk deliveries concealed within legal shipments. However this has not been confirmed.

Albeit to a lesser extent UK auction houses and antique dealers continue to be linked to the illegal sale of ivory. However this may not always relate to a deliberate attempt to contravene regulations. There are currently no identified auction houses prolifically linked to the distribution of ivory.

The new ivory Act 2018 creates domestic offences not reliant on CITES and is very likely to affect the offending statistics.

Despite this there is currently no identified UK based or connected organised crime involvement **[Low Confidence]**.

## Operations

**Operation LAKE** – A Europe based operation looking at the illegal trade of European eel. There continues to be significant intelligence gaps. A recommendation has been included within the NWCU Strategic Assessment for a problem profile to be produced. This will outline the current UK picture, suspect demographics and any potential networks, with a view to assist with proactive policing within the next European eel season.

**Operation STOOP & Operation TANTALLON** – primarily surround peregrines being taken for the purposes of the illegal trade.

**Operation LESHY** – A well-known Russian nominal operating within the reptile trade was arrested in June 2021 for attempting to smuggle reptiles out of Brazil. He was sentenced to 11 years imprisonment in December 2021. Analysis of his phone revealed numerous contacts and conversations with EU nationals relating to the illegal trade in reptiles and insects from across the world.

## Intelligence Gaps

Currently a baseline assessment of CITES and the individual sub categories cannot be determined due to limited data sources. Without the indication of “expected levels” changes in patterns and trends are more difficult to identify.

The financial picture, particularly around money flows, is a significant gap. It is unknown where payments are being made. Financial analysis would provide a greater understanding of and assist with identifying and developing potential networks.

The scale in which individuals utilise the internet for the illegal wildlife trade is currently unknown, and is discussed in more detail below under the cyber section.

There is a gap surrounding the methods and tactics used by offenders, particularly around trafficking methods; such as travel routes, vehicles, potential networks and recruitment.

Initial intelligence currently suggests that potential organised crime groups are operating within the illegal trade of European Eel and Raptors. It is unknown whether there are organised networks linked to the trade of Ivory, Reptiles, Health, Beauty and Medicines and Taxidermy.

### Recommendations

- ✎ Law enforcement and partnership agencies to raise awareness of CITES and IWT across the UK.
- ✎ For police forces to ensure continuity of wildlife crime officers so that the relevant training can be rolled out to staff to help tackle offences.
- ✎ For advanced training to be given to CITES specialist Wildlife Crime Officers (WCO's) and to establish a detective's academy.
- ✎ Encourage greater target focused intelligence sharing and partnership working between law enforcement and non-government enforcement agencies.
- ✎ Stricter checks on individuals and businesses applying for permits needs to be implemented and enforced to make it more difficult for individuals to manipulate and abuse the system for their own criminal gain. Consideration to be given to reviewing current processes to identify weaknesses and threats.
- ✎ NWCU to work with Border Force to complete a problem profile for each CITES priority theme.



## Illicit Finances Linked to Illegal Wildlife Trade

The illegal wildlife trade has been identified as the fourth largest illegal trade behind drugs, people smuggling and counterfeiting. It is estimated to be worth around £17bn a year globally, although this is likely to be an underestimate, as it is acknowledged that a large proportion of IWT goes unreported.

This highly organised criminality is appealing to offenders as it typically results in a high return, and poses a lower risk when compared with trading and movement of other commodities (people, drugs and firearms) where penalties are more severe.

The UK is currently failing to properly assess its role in laundering the proceeds of IWT. While the UK has clear processes to determine national wildlife crime priorities, there is no IWT-specific money laundering threat assessment or an accurate understanding of the scale of IWT-related money laundering in the UK. This mirrors the global picture with extremely limited financial investigations running alongside IWT investigations and low levels of confiscation investigations being completed post-conviction.

To date there has been limited capacity and capability at police forces and NWCUC for financial investigations. The NWCUC is currently undergoing recruitment for a financial investigator, which is anticipated to help to fill intelligence and investigative gaps.

UK and United Arab Emirates (UAE) governments launched a new toolkit to support financial institutions in tackling illicit money flows associated with illegal wildlife trade at Expo Dubai on 3<sup>rd</sup> March 2022 to coincide with UN World Wildlife Day.

The IWT Financial Flows Toolkit is aimed at supporting governments and financial institutions to raise awareness of IWT helping them identify and mitigate suspicious transactions associated with illegal wildlife trade<sup>6</sup>. The toolkit builds on the landmark UK-UAE Partnership agreement to tackle illicit financial flows, formed in September 2021.

The financial sector can play a pivotal role in fighting this crime. Through public-private partnerships and international co-operation, we can establish strong foundations of information sharing to detect and address illicit money flows that have a detrimental impact on our economies and environment. It can help to gain a better understanding around criminal networks and may assist in building an understanding of hierarchies both nationally and internationally.

The use of the 2021 UK Government legislation (Global Anti-Corruption Sanctions Regulations), will also assist with investigating and tackling IWT:

- ✦ The Regulations provide the relevant UK Secretary of State (Foreign Secretary) with the power to designate 'involved persons' (i.e. individuals involved in serious corruption).
- ✦ It authorises the imposition of financial and immigration sanctions on designated individuals (i.e. asset freezing and travel bans).
- ✦ The decision on sanctions is based on consideration of evidence presented to the Foreign, Commonwealth and Development Office, and not at the conclusion of judicial process.
- ✦ The fact that the action is undertaken by the UK (or US) Government removes the challenges in trying to secure any form of conviction, in the country where the individual is based; however the impact is significant and the negative publicity and even action, which can be generated in the country in question, is, in itself, a powerful disincentive.

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<sup>6</sup> Obtained from TRAFFIC Website – Toolkit was produced by UK Minister Lord Tariq Ahmad of Wimbledon in collaboration with his Excellency Ahmed Ali Al Sayegh.

The Proceeds of crime Act (POCA) legislation has been used to impose financial penalties which has resulted in two successful prosecutions during the last two years:

As mentioned above (under CITES section), the Confiscation investigation for Arron HALSTEAD resulted in a benefit figure of £99,137.32, with an order to pay £71,489.40 imposed.

The second successful POCA investigation related to ivory trader; CHUNG-LAW Ngie. In 2016, a warrant was executed and 500+ pieces of ivory were seized. He was sentenced to imprisonment 2 year sentence, suspended for 2 years and a 6 month curfew. The Confiscation investigation was completed on 19<sup>th</sup> March 2022 which resulted in an order to pay £61,266.97 and also an order under S143 Powers of Criminal Courts sentencing Act 2000 for forfeiture of all ivory items seized.

These two successful Confiscation investigations illustrate the importance of financial investigations, which also help to impose harsher penalties on offenders committing wildlife crime.

In terms of intelligence, financial intelligence development may assist with identifying links between people, addresses and organisations. It is anticipated that this will help to follow money flows and potentially identify any organised crime groups, including outlining a clear hierarchy.

### Intelligence Gaps

There is a significant gap surrounding financial intelligence, it is anticipated that understanding money flows would assist with identifying and or developing potential networks.

Training is being rolled out to NWCU Analysts and Intelligence Officers so that financial intelligence can be collated and incorporated into future analysis.

### Recommendations

- ✔ To conduct financial investigations, develop financial intelligence and complete analysis to help understand money flows, identify prolific offenders and any potential networks. The recruitment of the financial investigator within the NWCU will significantly assist with this.
- ✔ To work closely with current policing assets (ROCU's and force financial investigation teams).
- ✔ To maximize police and private sector relations.
- ✔ To share the glossary of keyword searches with the banking sector, to increase the reporting of financial intelligence linked to IWT.
- ✔ To form a financial crime peer group to share expertise and best practice.

## Cyber enabled Illegal Wildlife Trade

Cyber-crime is an 'umbrella' term for lots of different types of crimes which either take place online or where technology is an enabler. It is one of the fastest growing criminal activities across the world, and can affect both individuals and businesses. The internet has been identified as a common facilitator within the illegal wildlife trade. Marketing sites are a key method for sellers to advertise and distribute their illegal wildlife stock, enabling offenders to both facilitate and engage in criminality.

Criminals are also utilising social media platforms and encrypted online messages for communication purposes.

The NWCU contextualise wildlife crime across key thematic threat areas – focusing on the ways in which wildlife crime is perpetrated, rather than limiting it on a species by species basis. As a result, in 2018, cyber enabled wildlife crime became one of the areas of priority focus within the UK.

Cyber enabled wildlife crime ultimately allows criminality to continue. The use of the internet as an enabler in the facilitation of wildlife crime manifests throughout many types of wildlife crime; from the on-line trade in illegal egg collections to the organisation of hare coursing competitions to the trade in endangered species.

The vast majority of illegal wildlife trade investigations that the NWCU have supported in recent years have included varying aspects of on-line trade. Our growing awareness of 'cyber' enablers highlighted how integral it was to have a Priority Delivery Group look exclusively at cyber enabled wildlife crime.

The true extent of the trade of CITES and protected species via the internet continues to be largely unknown, however it does continue to be highlighted as a clear substantial risk. Intelligence has consistently identified links between illegal wildlife trade and online selling platforms. Challenges arise when examining advertisements and images for sale on internet sites, as there may not always be sufficient details/evidence to confirm whether they are in fact CITES-listed or protected.

It should be noted that there are also innumerable fake advertisements and scams on the Internet, many involving animal specimens. Sellers use these advertisements in an attempt to scam buyers with fake or non-existent animal or plant specimens. This method has also been identified by Border force. Regardless as the intent was there the suspect can still be prosecuted under COTES as it was advertised and sold as a CITES listed product (principal Regulation 338/97 Article 2).

Offenders often use social media platforms to communicate with one another and in some instances upload images of their crimes **[High Confidence]**.

It is judged that currently offenders are aware that wildlife crime offences are not a priority for the majority of law enforcement agencies and therefore operate their criminality on the open web. It is not anticipated that offenders are currently utilising the dark web to conduct wildlife crime **[Moderate confidence]**.

As raised in the previous Strategic Assessment; continued NWCU online development is required to improve data access to the full range of on-line trading forums and social media sites, which will enhance the ability of all police forces to investigate cyber enabled wildlife crime.

Not only can the internet be used to identify and evidence offenders organising and committing crime, but it can also be utilised to identify further information about offenders including; personal details, associations and links to business and addresses.

The UNODC International Consortium on Combating Wildlife Crime (ICWC) Toolkit outlines a number of recommendations to assist with combating cyber enabled wildlife crime, the main recommendations that should be considered by the UKTCG have been listed below:

- ✎ Establish a cyber section within the NWCU to enhance the effectiveness of the unit. This section would assist in the analysis of electronic devices seized during wildlife crime cases within the UK.

While the positions could be funded using the current funding methods, the equipment and licences could be gifted to the unit either as part of the forensic analysis fund or from other donors. Analysis of these devices would provide data that could be fed back into the NWCUC's intelligence database, increasing their intelligence holdings and thus generating further leads for investigations. For further information on this please refer to the Data section of this report.

- ✎ Cyber PDG Lead to consider the development of specific guidance for Border Force, police and prosecutors across the UK regarding cyber-enabled wildlife crime.
- ✎ Home Office to consider reviewing existing national legislation and regulations relating to virtual transactions and consider prohibition of some items identified as particularly prevalent or of concern in this context.
- ✎ PDG Lead to continue existing efforts in identification and removal of postings offering illegal wildlife and plant products for sale. There is a level of "plant blindness" that is not limited to the UK's law enforcement but has been observed by the technical team in nearly all jurisdictions where ICCWC assessments are conducted.

### Operations

The NWCUC are currently making overtures that will involve investigating cyber enabled wildlife crime which is organised and/or facilitated on the dark web. This will be achieved through interaction with the Regional Dark web Operations Teams (RDOT's) network.

Operation Dark HunTOR will review data to ascertain if any wildlife trafficking offences can be identified. This operation has already led to over 150 arrests in nine countries for buying or selling illicit goods (primarily firearms and drugs). The data was obtained from the takedown of the largest identified dark market at the time. Proactive searches of live dark markets are ongoing.

Operation VISUALISE provides a service to the Police WCO network for allowing the enhancement of visual imagery obtained from wildlife investigations. These derive from a wide range of sources including images obtained through trailcam or from the internet. This can assist in the identification of suspects, property, and vehicles.

Operation MODIFY is a CollegeLearn training package for law enforcement, this aims to provide police officers/staff with the knowledge to assist with digital investigations.

### Intelligence Gaps

Like financial analysis, open source research could assist with; understanding the true scale of the problem, identifying prolific offenders and establish roles and hierarchies within potential networks.

The use and scale of online social media and sale platforms utilised by organised networks for the purposes of wildlife crime (including national and international networks) currently remains unknown.

Surveys have identified that computers and mobile phones are not always being seized as a matter of course, despite there being powers to do so. An aim of the PDG will be to address this, by highlighting to Police WCO's that interrogating these devices will potentially provide opportunities from an investigative standpoint.

Digital data secured as part of wildlife investigations is generally kept within individual forces and not collated for pattern analysis, this data could be more effectively exploited to map out OCG's, frequent locations, their connections and methodologies utilised.

### Recommendations

- ✎ NWCUC and CITES PDG to link in with the Cyber PDG lead and the Durrell Institute of Conservation & Ecology (DICE) to consider implementing regular, proactive open source

## OFFICIAL SENSITIVE: POLICE AND PARTNERS

research with a view to identify offenders/companies involved in the online trade of CITES, as well as new methods and trends.

- ✔ It is recommended that it is mandatory for all Police Wildlife Crime Officers (WCO) to complete the Operation MODIFY training package.
- ✔ An app named “CyberDigiTools” is available on Police Service mobile devices. This app offers advice on a range of cyber and digital issues including terminology, resources, and investigative guidance. It is recommended that awareness of this application is promoted across the WCO network.
- ✔ To evidence the value of incorporating financial and cyber resources within IWT investigations and to raise awareness of IWT offences within cyber and economic crime units.
- ✔ To promote the seizure and investigation of mobile phones when individuals are arrested for IWT offences, this may assist investigations, by identifying methods and tactics used by offenders, cross border criminality, identifying new locations, new offenders, and confirming criminal associations.

## Organised Crime Groups (OCG) Linked to Illegal Wildlife Trade

The illegal wildlife trade can be conducted by lone individuals and small cohorts, but also complex and organised hierarchical groups.

There are two main types of OCG networks, firstly; a mapped OCG recorded with a Serious and Organised Crime (SOC) criminality primary threat (i.e. drug supply), where members also commit illegal wildlife trade. Some offenders are commodity dealers and therefore will traffic/distribute anything so long as it generates a profit. Further development needs to be made around the UK mapped networks to fully understand the links to the trade.

Alternatively, there may be organised crime groups where IWT is identified as their primary threat.

There is currently one mapped Organised Crime Group (OCG) recorded with the primary threat of illegal wildlife trade [**High Confidence**]. This network were involved in the illegal trade of raptors, after it was identified that wild taken birds were being exported to the Middle East. Further intelligence is required around this network to ascertain whether this group are still active.

It is important that UK based OCGs, especially those committing cross-border, transnational or international criminality are identified and mapped. This will help to ensure that appropriate resources are assigned to proactively target the most harmful members, who pose the most risk within the illegal trade.

Due to the nature of these offences and markets, it is likely that the majority of networks will have links to international groups. Therefore cross border working with law enforcement outside of the UK is crucial when identified. The sharing of information will help to provide a greater understanding and assist with highlighting the biggest threats to and within the UK.

Intelligence development and analysis within adopted Operations such as Operation STOOP, TANTALLON, LESHY and LAKE will help to identify any potential organised crime networks.

## Intelligence Gaps

- ✘ The number of potential organised networks operating within the trade.
- ✘ The links to cross border criminality and whether individuals are committing other areas of serious and organised crime.
- ✘ Methods and tactics used by offenders and how people operating within the trade are recruited.
- ✘ Links to other countries and foreign national offenders.

## Recommendations

- ✘ NWCUC and law enforcement to develop intelligence with a view to identifying and mapping IWT OCGs operating within the UK.
- ✘ For illegal wildlife trade to be added to the OCG tracker as a primary, secondary and tertiary threat.
- ✘ Assessment of national OCG mapping data needs to be made to understand how many SOC threat mapped OCGs are also committing IWT.
- ✘ To ensure that liaison with other countries is made when identifying foreign national offenders and criminal links to other countries.

## **OFFICIAL SENSITIVE: POLICE AND PARTNERS**

- ✎ Home Office to consider including the illegal wildlife trade within the serious and organised crime strategy so that such offences and intelligence can be captured, investigated and managed more effectively by Police Forces and partners

Appendix A – Glossary of terms

Acronym	Name
APHA	Animal and Plant Health Agency
CEMA	Custom and Excise Management Act
CITES	Convention International Trade Endangered Species
COTES	Control of Trade in Endangered Species
Defra	Department for Environment, Food & Rural Agency
DICE	Durrell Institute of Conservation & Ecology
IWT	Illegal Wildlife Trade
JNCC	Joint Nature Conservation Committee
NWCU	National Wildlife Crime Unit
OCG	Organised Crime Group
PDG	Priority Delivery Group
PNC	Police National Computer
PND	Police National Database
POCA	Proceeds of Crime Act
PWCO	Police Wildlife Crime officers
ROCU	Regional Organised Crime Unit
RUSI	Royal United Services Institute
UK BF	UK Border Force
UKTCG	UK Tactical Coordination Group
UNODC	United Nations Office on Drugs & Crime
WCO	Wildlife Crime Officers