REDUCING MARITIME TRAFFICKING OF WILDLIFE

BEST PRACTICES FOR PORTS

AUGUST 2023

USAID
FROM THE AMERICAN PEOPLE

GLOBAL WILDLIFE PROGRAM

gef

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REDUCING MARITIME TRAFFICKING OF WILDLIFE:
BEST PRACTICES FOR PORTS

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The GEF-financed, World Bank-led Global Wildlife Program (GWP) brings together over 30 countries across Africa, Asia and LAC to combat IWT, with US $230m GEF investment and an additional US $1.4bn co-financing. Maritime trafficking of illegal wildlife products was identified as a critical technical area for the GWP to connect countries and regions across trafficking chains including ports in Asia. The *UNDP-GEF-USAID Reducing Maritime Trafficking of Wildlife between Africa and Asia* project under the GWP supported knowledge exchange and replication across GWP participating countries, for example in the Philippines, Indonesia and Pakistan, creating and strengthening specific connections between the ports of each country to better tackle wildlife trafficking from both the African export side and the Asian transit and import side. For more information, visit the GWP website at: https://www.worldbank.org/en/programs/global-wildlife-program.

USAID works to address wildlife trafficking in countries that are sources of wildlife and wildlife products, transit points, and/or destinations for sellers and buyers. Agency partnerships build the capacity of rangers and scouts, forensic scientists, legislators, prosecutors, and judges to detect, arrest, investigate, prosecute, and adjudicate, and sentence criminals along this illegal supply chain. USAID also supports social behavior change campaigns and conservation compatible livelihoods to reduce demand for wildlife products and reduce incentives for people to engage in poaching and illicit trade. Rural communities and members of the transport, financial, and tourism industries are critical partners in preventing, detecting, and disrupting wildlife trafficking. With this support, USAID's partner countries can better fight the criminal networks that undermine development efforts, and better conserve their wildlife for future generations. The *Reducing Maritime Trafficking of Wildlife between Africa and Asia* project was expanded in 2021 through funding from USAID. For more information, visit https://www.usaid.gov/biodiversity/wildlife-trafficking.

UNDP works in about 170 countries and territories, helping to eradicate poverty, reduce inequalities and exclusion, and build resilience so countries can sustain progress. As the UN's development agency, UNDP plays a critical role in helping countries achieve the Sustainable Development Goals. With its deep local experience and wide global network, UNDP plays a pivotal role in international development as a knowledge broker, capacity builder, innovator, and facilitator of exchanges in the global development debate. The *Reducing Maritime Trafficking of Wildlife between Africa and Asia* project was implemented by UNDP between 2018 and 2023.

Acknowledgements

We, the project team, would like to express our deep gratitude to the many people who have been involved throughout the life of our UNDP-GEF-USAID *Reducing Maritime Trafficking of Wildlife between Africa and Asia project.*

Firstly, we would like to thank our donors, the GEF-funded, World Bank-led Global Wildlife Program (GWP) and USAID, including USAID KE & East Africa, USAID Tanzania and USAID Uganda, for their support and commitment to this five-year initiative.

Our heartfelt thanks go out to our organizing partners for their collaboration, commitment and guidance: TRAFFIC East Africa Office, United Nations Office on Drugs and Crime - World Customs Organization Container Control Program, APOPO, East African Community Authorized Economic Operator Program, Grace Farms Foundation, International Maritime Organization, Institute of Chartered Shipbrokers, Lusaka Agreement Task Force, Space for Giants, United for Wildlife, The Royal Foundation, University of Washington, US Homeland Security Investigations, WildAid, World Wide Fund for Nature, and the UNDP Country Offices in Kenya, Tanzania, and Uganda. Each of them contributed diverse expertise and skills and engaged many different organizations in the region throughout the roll-out of this project.

We would also like to extend our thanks and appreciation to the region's private sector associations and companies, namely the Federation of Freight Forwarders Associations, Kenya Shipping Agents Association, Port Management Association for Southern and East Africa, Tanzania Freight Forwarders Association, Tanzania Shipping Agents Association, Tanzania Truck Owners Association, Tanzania Customs Academy, and Tanzania Private Sector Foundation, for their participation and invaluable insights.

Finally, we had the immense privilege of working with many courageous and passionate officers from customs, police, law enforcement, port, and wildlife authorities in East Africa—those who work each and every day on the frontlines, at the ports and transport nodes, to reduce the risk of wildlife trafficking by sea. We would especially like to thank the following agencies for their important contributions: Kenya Maritime Authority, Kenya Ministry of Tourism and Wildlife, Kenya Ports Authority, Kenya Revenue Authority, Kenya Wildlife Service, Tanzania Ministry of Natural Resources and Tourism, Tanzania Revenue Authority, Tanzania Ports Authority, Tanzania Wildlife Management Authority, Uganda Revenue Authority, Uganda Wildlife Authority.

May the impact of our partnership continue to ripple across the region for years to come.

> The illegal wildlife trade must be made unprofitable and extremely uncomfortable. We must join hands to help each other so that we stay a step ahead of the criminals."
>
> **Honourable Najib Balala, Former Cabinet Secretary**
>
> Kenya Ministry of Tourism and Wildlife, Oct 2019

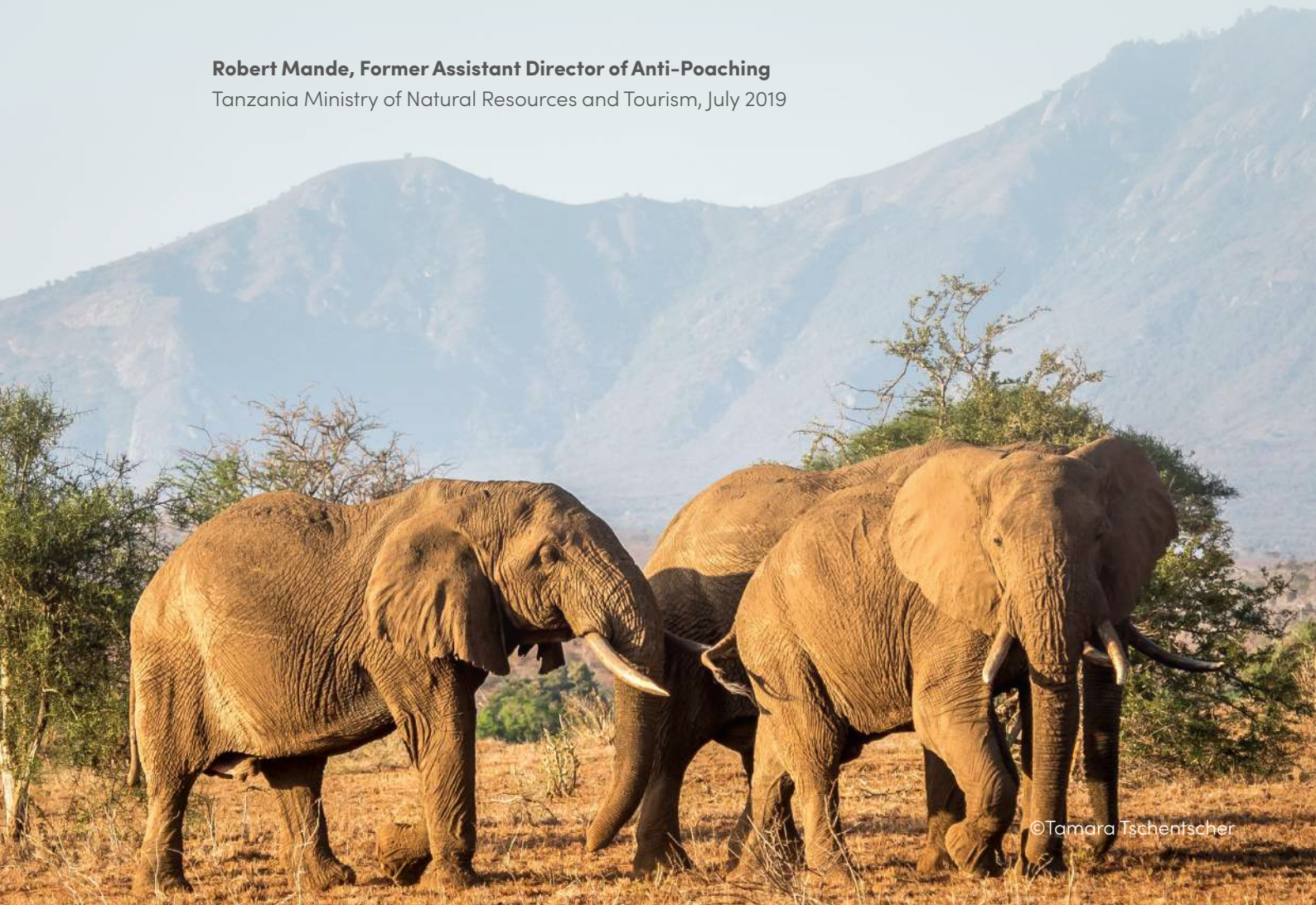
UNDP-GEF-USAID Maritime Trafficking Project Team (from left to right): Mikhail Paltsyn, Tamara Tschentscher, Vella Angima, Petra Valastinova, Harun Guclusoy. Photo: Petra Valastinova, UNDP.

Acronyms

ACCU	Air Cargo Control Unit
AEO	Authorized Economic Operator
APOPO	Anti-Personnel Landmines Detection Product Development (Anti-Persoonsmijnen Ontmijnende Product Ontwikkeling)
CCP	Container Control Programme
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CTS	Cargo Targeting System (of the World Customs Organization)
DNA	Deoxyribonucleic Acid
EAC	East African Community
EIA	Environmental Investigation Agency
FAL	Facilitation Committee (of the International Maritime Organization)
GEF	Global Environment Facility
GWP	Global Wildlife Program
ICCWC	International Consortium on Combating Wildlife Crime
ICD	Inland Container Depots
ICS	Institute of Chartered Shipbrokers
IMO	International Maritime Organization
IWT	Illegal Wildlife Trade
KWS	Kenya Wildlife Services
KPA	Kenya Port Authority
KRA	Kenya Revenue Authority
KYC	Know Your Customer
NGO	Non-Governmental Organization
ODPP	Office of the Director of Public Prosecutions
PCU	Port Control Unit
SME	Small- and Medium-Sized Enterprise
TAWA	Tanzania Wildlife Authority
TEU	Twenty-foot Equivalent Unit
TRA	Tanzania Revenue Authority
TWIX	Trade in Wildlife Information eXchange
UfW	United for Wildlife
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development
WB	World Bank
WCO	World Customs Organization
WWF	World Wide Fund for Nature

“It is only through collaboration in sharing of intelligence, exchange of operational techniques, sharing of modus operandi used by poachers and traffickers, etc. that we can truly build a united front against illegal wildlife dealers worldwide.”

Robert Mande, Former Assistant Director of Anti-Poaching
Tanzania Ministry of Natural Resources and Tourism, July 2019



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Foreword

Wildlife crime threatens a vast number of animal and plant species and the health and safety of people and planet. It exacerbates poverty, undermines conservation efforts, drives conflict, creates instability, fuels corruption, increases the risk of disease and future pandemics, and robs countries of millions in revenue. It is a complex, global threat, linked to transnational organized crime, and it's on the rise.

Illegal wildlife trafficking is among the 5 most lucrative crimes in the world, worth an estimated US $23 billion, and impacting more than 7,000 species of animals (citation?).

Seaports are key gateways for wildlife smugglers, who use shipping containers to move their illicit products alongside legitimate cargo, with minimal risk of interception.

A significant level of the illegal wildlife trade is conducted through maritime trafficking. Criminal networks take advantage of loopholes in the shipping industry and the high volume of container traffic to move their illicit goods undetected through Africa's seaports into markets in Asia, where the majority of consumer demand for illicit wildlife products lies.

In 2018, the *Reducing Maritime Trafficking of Wildlife between Africa and Asia* project was launched to curb maritime wildlife trafficking, targeting key routes and transit points between East Africa and Asia. Funded by the Global Environment Facility (GEF) and USAID, the US $4 million project was implemented by UNDP under the GEF-funded, World Bank-led Global Wildlife Program (GWP) from 2018 until 2023.

With high-level political support and cooperation from actors across multiple sectors along the maritime supply chain, the project promoted a complex system of effective practices for combating the illegal wildlife trade through ports.

In the pages that follow, you will read about cutting-edge tools, such as trained sniffer rats, automated cargo profiling, financial investigation and wildlife crime forensics; new maritime industry guidelines, port control units and outreach campaigns; as well as tools to increase collaboration between the public and private sectors.

This publication pays homage to the important efforts of law enforcement authorities, private sector, and NGOs across the maritime sector, particularly in East Africa, to step up their fight against wildlife trafficking.

The best practices documented here are testimony to what can be achieved when we all work together across seaports, sectors, and borders to prevent, detect, and intercept maritime trafficking of wildlife. These practices are applicable for any ports in the world affected by wildlife trafficking.

They should be widely shared, scaled-up and advocated for further investment.

According to the Elephant Trade Information System (ETIS 2018), for instance, **403 tons** of ivory were seized from 2007-2017 – equivalent to about **54,460** killed elephants.

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Overview

In 2020, 798.9 million TEUs of containers moved through the world's ports (UNCTAD 2022). Of these, typically only 2% were inspected. Ports are transit points that are particularly vulnerable to wildlife and other illicit trafficking due to high volumes of cargo, high urgency to move goods quickly to facilitate the growing demand of international trade, limited capacity of customs to ensure the safety of the supply chain, and limited time for cargo risk profiling and inspection. These vulnerabilities are exploited by criminal groups for trafficking of illicit products.

According to the Elephant Trade Information System (ETIS 2018), for instance, 403 tons of ivory were seized from 2007-2017 – equivalent to about 54,460 killed elephants. Only in the period of March 2017 to February 2018, 46.8 tons of African pangolin scales were seized in Africa and South-East Asia.

Among key African ports known to be actively exploited by wildlife traffickers are Mombasa, Kenya; Dar es Salaam and Zanzibar, Tanzania; and Kampala, Uganda (transit dry port for wildlife trafficking). In 2007-2019 these four ports were implicated in seizures of more than 85 tons of ivory (TRAFFIC 2019; EIA 2019).

In 2020, **798.9 million** TEUs of containers moved through the world's ports (UNCTAD 2022). Of these, typically only **2%** were inspected.

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Despite a shift of wildlife trafficker routes to ports of West Africa (Lagos, Nigeria; Matadi and Boma, DRC; and Lome, Togo) in 2018-2019 (Wildlife Justice 2019), Mombasa, Dar es Salaam and Zanzibar ports remain attractive and vulnerable to traffickers given their strategic location (key exit/entry points from Africa to Middle East and Asia) and size.

Both Mombasa and Dar es Salaam ports are under active development due to high volume of investments. In 2017, Dar es Salaam Port obtained a $345 million loan from the World Bank to improve its infrastructure and management capacity with a goal to increase annual port volume from the current 14 million tons to 38 million tons by 2030 (World Bank 2018). Mombasa Port is expecting to benefit from a €1.4 billion investment of the European Investment Bank to enhance its volume capacity from the current 20 million tons to an estimated 40 million in the next decade (AllAfrica 2018).

The increased port operations will potentially lead to increased cases of wildlife and other illicit trafficking through them. The same is true for Kampala – one of the largest transport nodes in East Africa – which has been actively used by traffickers as a transit point to ports in both East and West Africa (AWF 2020).

These ports, as well as many other ports in the world, need much more capacity to monitor and inspect the increasing volume of ships and goods that come through each day, particularly when it comes to wildlife trafficking, which is carried out using increasingly sophisticated techniques to avoid detection. And even when illegal goods are detected and seized, it is often difficult to track down and gather evidence against smugglers who will hide their identities by using false names, false declarations and front companies.

Corruption compounds these challenges, with many maritime operators and law enforcement officers at risk of being bribed or even threatened by wildlife traffickers to turn a blind eye to or actively enable wildlife trafficking by concealing goods, forging documents, or filing last-minute alterations to Bills of Lading to obscure a shipment's origin, route and destination.

There is also a general lack of awareness along the shipping supply chain of the seriousness of wildlife trafficking, its methods of infiltration and the role the industry can play in both enabling and preventing this crime. The priority at ports remains the efficient movement of goods and the generation of revenue.

Reducing Maritime Trafficking of Wildlife

Preventing, detecting, intercepting and prosecuting wildlife trafficking by sea requires a holistic approach across multiple sectors including widespread awareness, effective and automated risk profiling, innovative detection techniques, collaboration between law enforcement and private sector, proper investigation and prosecution practices.

For these to be achieved, all stakeholders across the maritime transport sector, including law enforcement agencies with a mandate related to illegal trade in wildlife as well as the private sector, need to be working together to ensure that wildlife traffickers are unable to infiltrate legal trade routes.

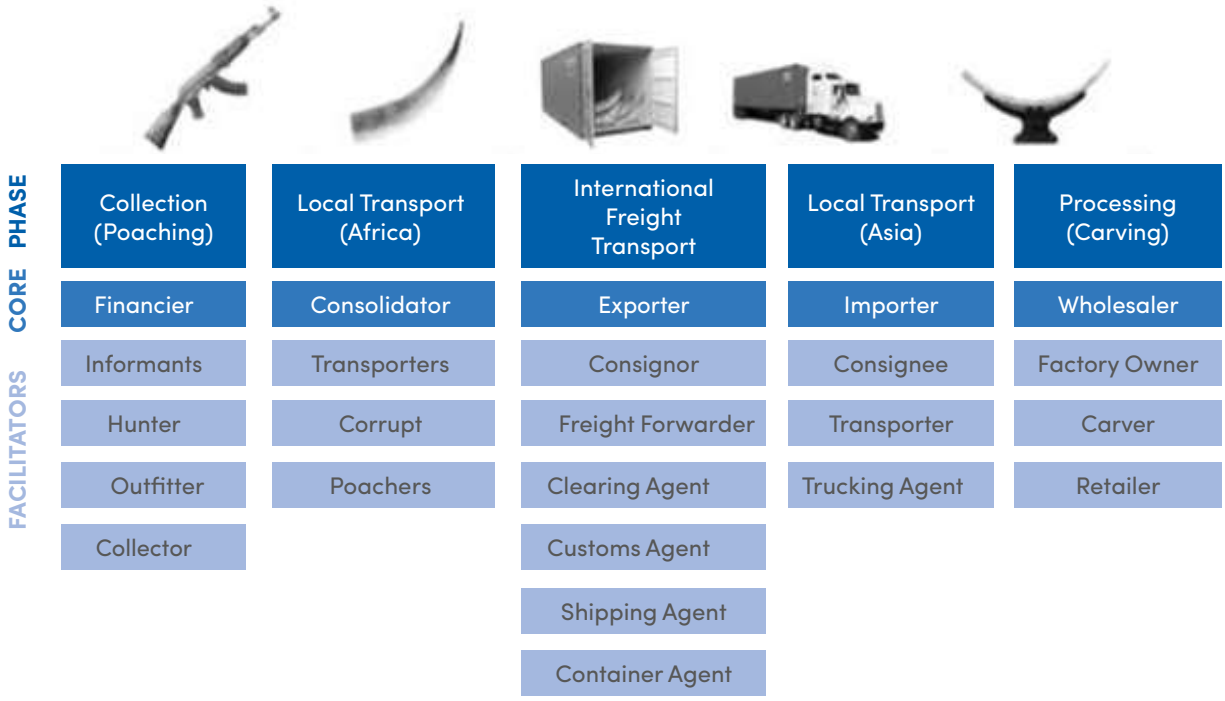
From 2018 to 2023, the UNDP-GEF-USAID project *Reducing Maritime Trafficking of Wildlife between Africa and Asia,* as part of the GEF-funded, World Bank-led Global Wildlife Program (GWP), worked to strengthen wildlife law enforcement at ports and to increase cooperation between different port and maritime stakeholders to ensure supply chain security. It targeted critical ports in East Africa that are actively used by wildlife traffickers to transport illegal goods to Asia, mainly Mombasa port in Kenya, Dar es Salaam and Zanzibar ports in Tanzania, as well as Kampala dry port in Uganda. Apart from a particular focus on Africa, coordination with ports in Asia was achieved across participating GWP countries working at ports.

PARTNER LOGOS

The Reducing Maritime Trafficking of Wildlife project was designed and implemented in collaboration with many state agencies, regional and international organizations and the private sector.

FIGURE 1

The Wildlife Trafficking Supply Chain



The trafficking chain of wildlife products such as ivory and rhino horn consists of several steps from source (in Africa) to end point (in Asia), each of which involves different actors.

The project focused to address the following gaps at the target ports:

- Low wildlife crime intelligence capacity.
- Insufficient knowledge and skills in CITES' regulations, identification, and risk indicators.
- Lack of automatic risk profiling of sea containers.
- Insufficient means and practices for container inspection.
- Insufficient law enforcement collaboration between African and Asian ports.
- Low conviction rate upon wildlife seizures due to lack of export agents' due diligence and law enforcement insufficient investigation capacity.
- Lack of cooperation between law enforcement and private sector at ports.
- Insufficient awareness at ports on wildlife trafficking impacts on national economies

Through the process of identifying and addressing the gaps above, the project used the following practices further described in this publication:

- Port Stakeholder Workshops
- Port Monitoring and Anti-Trafficking Evaluation Tool (PortMATE)
- Port Control Units (PCUs)
- Sniffer Rats to Detect Wildlife Trafficking in Cargo
- Automated Risk Profiling Systems
- Supply Chain Security Program
- Know Your Customer Regulation for Export and Import Agents
- Forensic Analysis of Wildlife Seizures
- Financial Investigation of Wildlife Crime
- IMO Guidelines to Combat Wildlife Trafficking on Ships
- Wildlife Crime Awareness Campaigns at Ports.

Why this Best Practices Publication?

The Reducing Maritime Trafficking of Wildlife project promoted and supported the application of concrete measures that can be called effective (and even best) practices to fight wildlife trafficking through ports. They each have the potential to be replicated by other ports in other countries to prevent and intercept wildlife trafficking through the maritime supply chain. Some of these practices are still in the process of development or may be further improved by other projects, but they all have significant potential for replication at different ports affected by wildlife trafficking.

This publication is geared towards Government agencies (including customs, port authorities, wildlife authorities, etc.), private sector and business associations along the maritime supply chain, as well as other international organizations and NGOs grappling with similar challenges.

The eleven promising practices highlighted in this report were identified as particularly relevant for seaports globally by the project team. When applied through a systematic and strategic approach, they tackle the illegal wildlife trade from multiple angles, using different techniques and innovative methods, across different sectors and borders. Each story summarizes the challenge at stake, the approach used to address the challenge and the resulting impact on the ground. We hope they provide support to and motivate our partners around the world as they navigate the complex issue of wildlife crime with the day-to-day realities of port life. May they be shared widely among colleagues and friends and tailored to other ports. May they continue to have impact as we join our efforts across borders, sectors, and ports to prevent, detect, and intercept wildlife trafficking by sea.

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Our Impact on the Ground

The UNDP-GEF-USAID 'Reducing Maritime Trafficking of Wildlife between Africa and Asia' project

Port Stakeholder Workshops organized in Dar es Salaam (July 2019), Mombasa (October 2019), and Kampala (March 2022) gathered **200 participants** and produced practical recommendations to better prevent and intercept wildlife trafficking through a collaborative approach.

Six detection rats trained to sniff out wildlife contraband in shipping containers successfully passed the test at Dar es Salaam Port in Tanzania: detected **84% of wildlife** targets hidden in cargo. They will soon make Dar port home and will be a welcome complement to the port's existing screening methods.

Automated cargo profiling system was introduced to Dar es Salaam PCU in Tanzania. **44 port officers** in Kenya and Tanzania successfully completed basic trainings on automated cargo profiling systems: WCO Cargo Targeting System and RiskProfiler. The systems profile thousands of containers in a matter of minutes to detect suspicious cargo that is likely to contain wildlife or other contraband.

A Port Control Unit was established at Zanzibar Port, a key transit port for wildlife and other illicit trafficking from Africa. The Unit is staffed by **9 specially trained officers** from **4 government agencies**.

42 officers from the Mombasa, Dar es Salaam, and Kampala PCUs successfully completed the UNODC-WCO Container Control Programme advanced training on CITES, wildlife crime intelligence, and risk profiling.

35 officers from Kenya, Tanzania, and Uganda completed basic and advanced trainings on wildlife crime financial investigation and ivory sampling for forensic analysis. **50%** of the officers regularly utilise the skills acquired during the training.

33 officers from Kenya, Tanzania, and Uganda received Controlled Delivery field training.

38 officers operating at the Kampala dry port and Zanzibar, Mombasa and Dar es Salaam ports trained on the Eastern Africa TWIX platform.

3 large-scale and **5 small-scale** ivory seizures **(14,900 kg)** made in Kampala, Singapore, Hong-Kong, and in Kenya have been DNA-analysed to support ongoing criminal investigations.

450 people from private sector and government agencies completed the project e-courses on supply chain security measures; **203 participants** (**90%** private sector) trained at EAC AEO in-person workshops in Kampala, Mombasa, and Dar es Salaam. **53.4 %** of the training participants indicated that their company is planning to join AEO program in the next 12 months.

9,000-11,000 port workers reached by the Wildlife Crime Awareness Campaign in Mombasa, Dar es Salaam, Zanzibar and Kampala.

The International Maritime Organization (IMO) Guidelines for the Prevention and Suppression of the Smuggling of Wildlife on Ships engaged in International Maritime Traffic, which were initiated and developed by the project, were **adopted in May 2022**.

The Port Monitoring and Anti-Trafficking Evaluation (PortMATE) tool, developed by the project, has been successfully applied for express assessments of ports and border posts in **Democratic Republic of Congo, Kenya, Pakistan,** and the **Philippines**.

The Project At-a-Glance

PROJECT MILESTONES AND ACHIEVEMENTS

JULY 2019
Port Stakeholder Workshops held at Dar es Salaam Port in Tanzania

OCTOBER 2019
Port Stakeholder Workshops held at Mombasa Port in Kenya

JUNE 2021
Automatic risk profiler system introduced to Dar es Salaam seaport

JUNE 2022
Controlled Delivery and Financial Investigative Techniques held in Arusha, Tanzania

JUNE 2022
Wildlife crime awareness/ security programmes and training courses developed for port-based private sector actors to improve supply chain security

MAY 2022
IMO Guidelines adopted (May 13)

JULY 2022
#DefendOurWildlife Campaign launched in Tanzania

AUGUST 2022
#DefendOurWildlife Campaign launched in Kenya

SEPTEMBER 2023
Know Your Customer Framework drafted and shared with public and private sector in Kenya

MARCH 2023
First field trial of APOPO detection rats at Dar es Salaam Port in Tanzania

NOVEMBER 2021

PCU established at Zanzibar Port in Tanzania

FEBRUARY 2022

Guidelines for the Prevention and Suppression of the Smuggling of Wildlife on Ships engaged in International Maritime Traffic drafted and submitted to IMO Facilitation Committee

MARCH 2022

Port Stakeholder Workshop held in Kampala Port in Uganda

MARCH 2022

Regional Training on Financial Investigative Techniques held in Mombasa, Kenya

MARCH 2022

6 HeroRATs in training to detect pangolin scales

APRIL 2022

Training for Mombasa and Dar es Salaam PCUs on wildlife crime intelligence and CITES knowledge

MAY 2022

Controlled Delivery and Financial Investigative Techniques training in Dar es Salaam, Tanzania

SEPTEMBER 2022

#DefendOurWildlife Campaign and new trafficking hotline launched in Uganda

NOVEMBER 2022

PortMATE Assessment of Mombasa Port in Kenya

JANUARY 2023

WCO CTS installed at Mombasa Port in Kenya

FEBRUARY 2023

Controlled Delivery and Financial Investigative Techniques training held in Entebbe, Uganda

Port Stakeholder Workshops: Collaborating in Kenya, Tanzania, and Uganda to Intercept Wildlife Traffickers

Port authorities and other stakeholders along the shipping supply chain between Africa and Asia gathered during a series of workshops to identify gaps at the target seaports in East Africa and develop collaborative solutions to address them. This inter-agency, cross-sectoral collaboration resulted in improved cooperation and knowledge sharing, as well as practical solutions integrated in the project framework.

The illegal wildlife trade (IWT) is among the five most lucrative illegal trades globally and estimated to be worth up to **US $23 billion annually.**

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The Challenge: Wildlife trafficking through East African seaports

The illegal wildlife trade (IWT) is among the five most lucrative illegal trades globally and estimated to be worth up to US $23 billion annually. Most illegal wildlife goods are trafficked by sea, due to the low risk of interception and arrest. Shipping companies may unwittingly be complicit, as traffickers often use legitimate transport, logistics services and commercial trade routes to smuggle wildlife and forest products out of Africa.

In East Africa, the ports of Mombasa in Kenya, Dar es Salaam and Zanzibar in Tanzania, as well as Kampala dry port in Uganda are particularly vulnerable, due to their size and strategic location. Kampala is one of the largest transport nodes in East Africa, actively used by traffickers as a transit point to ports of both East and West Africa. High-value investments and increased port volume in recent years could lead to further cases of wildlife trafficking as containerized trade increases.

The key challenge at the target ports was to identify critical gaps that allow traffickers to conduct illicit smuggling of wildlife and develop and implement complex measures in the project framework to close these gaps.

The Solution: Interagency and cross-sectoral collaboration

By working together, government, business and civil society in the region delivered value and outcomes that would be difficult or impossible to produce by working individually. Collaboration across agencies and sectors created synergies and a sense of community and ownership.

In an effort to develop a collective way forward in the fight against wildlife trafficking, a group of diverse port stakeholders representing government agencies, international organizations and the private sector gathered during three separate three-day workshops at the ports of Dar es Salaam (2 – 4 July 2019) and Mombasa (23 – 25 October 2019) as well as Kampala dry port (15 – 17 March 2022).

Before organizing the three workshops, TRAFFIC, which monitors the trade in wildlife species globally, undertook rapid assessments of the three locations to verify the extent of the illegal wildlife trade through each port. At the workshops the stakeholders agreed to join forces to tackle specific actions against wildlife trafficking through the region's ports, building trust through the exchange of ideas, the combination of resources, the leveraging of expertise, and the emergence of a deeper understanding of different stakeholders' objectives, needs and requirements. They addressed issues such as strengthening risk profiling and cargo inspection, private sector engagement, investigative capacity, and information exchange, and identified opportunities for intervention. Solutions generated at the workshops were incorporated in the project annual plans and implemented.

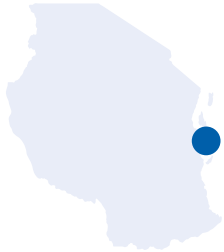
> The strategies laid out during the workshops were strengthened by the collaborative spirit between the port stakeholders. Their actions can serve as a template for other African ports to follow in the fight against wildlife crime."
>
> **Julie Thomson, Director,**
>
> TRAFFIC East Africa

"Four objectives shaped the way we developed and delivered the workshops," TRAFFIC's East Africa Director Julie Thomson said.

1. Deepen understanding of the risks and impact of wildlife trafficking brought to the port, the maritime industry and the country.
2. Assess current efforts and identify key gaps and opportunities in the supply chain to prevent, detect and intercept wildlife trafficking as well as other illicit trade.
3. Learn and share best practices and technology from other sectors.
4. Collectively identify priority actions to take forward to effectively tackle wildlife trafficking through the country's ports.

DAR ES SALAAM, TANZANIA

2-4 July 2019



Hosted by TRAFFIC, UNDP and UNODC, in partnership with the Wildlife Division of Tanzania's Ministry of Natural Resources and Tourism, the Tanzania Ports Authority (TPA) and the Tanzania Revenue Authority (TRA), the first three-day workshop was held in Dar es Salaam and gathered 57 representatives from the Tanzanian government, law enforcement agencies, shipping companies and associations, NGOs, UN organizations, along with national and international experts on wildlife trade and maritime issues.

"The workshop created a vibrant space to engage and collaborate," said Allan Mashalla of TRAFFIC. "There was a good mix of presentations, panels, group work and interactive plenary sessions."

Together, they identified key gaps and opportunities in the port management systems in detecting and intercepting illegal wildlife and other illicit trafficking. These included the need to understand, appreciate and communicate with different port stakeholders; share best practices from other countries and regions; increase awareness within the maritime industry of the risks of IWT and the kinds of actions that can be taken to support customs, such as sharing of the shippers' booking information well in advance; increase security checks at container freight stations and depots along the supply chain before the containers are sealed and loaded onto ships. Automated risk profiling and the EAC Authorised Economic Operator (AEO) Program were both seen as good alternatives to scanning 100% of all containers which would ultimately improve the smooth flow of trade and increase supply chain security at the same time. Corruption was seen to be a key challenge, with participants calling for a safe mechanism at port level for reporting illicit activities.

The results and solutions of the Port Stakeholder Workshop were presented to the Dar es Salaam Port Improvement Committee for the follow up actions to strengthen port capacity to prevent and intercept wildlife trafficking.

Download the Tanzania Workshop Report

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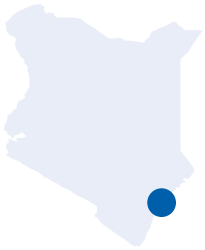
MOMBASA, KENYA

23 – 25 October 2019



To address the threat of wildlife trafficking through Kilindini Port (also referred to as Mombasa Port—Kenya's and East Africa's largest seaport), Kenya's Ministry of Tourism and Wildlife convened the three-day Port Stakeholder Workshop in partnership with the United Nations Development Programme (UNDP), the United Nations Office on Drugs and Crime (UNODC), TRAFFIC, and the World Wide Fund for Nature-Kenya (WWF-Kenya), with technical support from the World Customs Organization (WCO) and The Royal Foundation (TRF).

Seventy-three representatives from the Ministry of Tourism and Wildlife, Kenya Port Authority, Kenya Revenue Authority, Kenya Wildlife Services, Customs (Uganda, Tanzania, Nigeria, and Viet Nam), shipping companies and associations, UN organizations, USAID, and non-governmental organizations, along with national and international experts on wildlife trade and maritime issues, participated in the event. A total of 31 organizations from 12 different countries were represented at the workshop.

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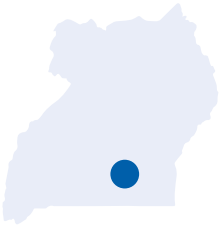
Participants called for the strengthening of existing processes including training for the recently established WCO Cargo Target System and for the EAC AEO Program to better secure the supply chain against wildlife trafficking.

The private sector called on government to provide clearer asks and regular feedback. They also stressed the need for more awareness raising of the IMO guidelines for the shipping industry, security checks along the supply chain, including at container freight stations and depots, and cross-border cooperation to better track and dismantle criminal networks.

Download the Kenya Workshop Report

KAMPALA, UGANDA

15 – 17 March 2022



The three-day workshop was convened by Uganda's Ministry of Tourism, Wildlife and Antiquities in partnership with TRAFFIC, UNDP, USAID, and UNODC. It brought together over 70 participants from the transport sector associations such as the Uganda Clearing Industry and Forwarding Association and the Uganda Freight Forwarders Association, as well as Government institutions such as Uganda Revenue Authority, Uganda Wildlife Authority, National Forestry Authority and representatives from international and non-governmental organizations and the private sector.

The workshop provided a vibrant space to foster stakeholder engagement and collaboration to counter illegal wildlife trade through Uganda's dry ports, involving a rich mix of presentations, group work and interactive plenary sessions. The workshop also provided a forum for participants to discuss, among others, information/intel-sharing mechanisms, wildlife trafficking related - risk indicators, including the issuance of permits, certificates and inspections, how wildlife trafficking responses can be better embedded within existing measures to counter other forms of illicit trades in the maritime supply chains; sharing of best practices and tools such as controlled deliveries and supply chains security programmes (e.g. 'know your customer', AEO, C-TPAT).

At the end of the workshop, stakeholders were able to identify wildlife trafficking enablers and critical vulnerabilities in the dry-port supply systems and what responses are required to counter them. Participants called for more robust public and private partnerships around information sharing and operational effectiveness, ultimately leading to increased revenue and efficient identification of illegal shipments and follow-up investigations.

Workshop Findings: Mapping Priority Actions

A number of common gaps were found to be present across all the ports in the region, including a lack of knowledge of wildlife crime and wildlife species identification, limited investigative capacity, insufficient means for profiling containers, lack of cooperation among law enforcement between ports, and lack of private sector engagement. Corruption was a main underlying factor across all ports and sectors.

These shared vulnerabilities were used to inform the priority actions of the *Reducing Maritime Trafficking of Wildlife project*, which centred its actions around several key areas, namely, strengthening law enforcement capacity, securing the shipping supply chains, engaging the private sector and raising awareness of wildlife trafficking through containerized cargo.

Next Steps: Continued Collaboration and Intelligence Sharing

All three workshops indicated the need for multi-stakeholder efforts to address the illegal wildlife trade. Having a wide range of participants, from diverse agencies, associations, companies and organizations was cited as key to the success of the three Port Stakeholder Workshops, providing a platform for much needed collaboration and information sharing to address IWT.

Lauded for their engaging and participatory format, the workshops were designed to ensure creative and guided discussions and working groups. Facilitated by a professional moderator, each session built on the outcomes of the previous session, yielding concrete insights and results. The dynamic design was critical to fostering open dialogue, trust and renewed commitments to counter wildlife trafficking across the diverse groups of maritime stakeholders.

> "To address the illegal wildlife trade, you really need a multisectoral approach," Thomson said. "There has to be an understanding and appreciation of the roles of different stakeholders, and we need to communicate with each other, build trusted relationships and share best practices."

In looking to the future, Thomson cited the need for increased awareness about the risks brought on by IWT, security checks at container freight stations and depots, and protection for whistle blowers.

> "It's completely understandable for an officer to stay quiet in the face of wildlife traffickers, who may also involved in the trafficking of drugs, arms and people," she said. "They need a safe space for reporting at port level."

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72%
of ivory is trafficked by sea in containerized cargo (2019).

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200 people
(**34% women, 20% from the private sector**) from 12 different countries and 31 different organizations participated in the Port Stakeholder Workshops.

PortMATE: Assessing Gaps at Mombasa Port in Kenya

The Port Monitoring and Anti-Trafficking Evaluation Tool (PortMATE) is designed to assess gaps and monitor progress at ports and other exit/entry points. It was recently used to assess the vulnerability of transport nodes in Uganda and Kenya connected to Mombasa Port and to determine whether law enforcement and the private sector there have the tools and capacities they need to prevent, detect and intercept wildlife crime.

The Challenge: Securing Mombasa's shipping supply chain

One of the busiest, largest, and fastest growing ports in East Africa, the Port of Mombasa is a critical transit hub not only for Kenya but also for its neighbouring countries, including Burundi, Democratic Republic of Congo, Ethiopia, Rwanda, Somalia, South Sudan, and Tanzania. It is managed by Kenya Ports Authority (KPA) and has a capacity of 2.65 million TEUs (KPA 2023). Thousands of containers are shipped through Mombasa every day. Three Inland Container Deposits (ICDs) in Nairobi, Kisumu and Eldoret are linked to the port by rail.

Mombasa's shipping supply chain is managed by Kenya Ports Authority (KPA) and has a capacity of **2.65 million TEUs** (KPA 2023).

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Large shipments of illegal wildlife products seized in Asia have been traced back to East Africa's ports, having passed through undetected alongside legitimate cargo. The Busia and Malaba border crossings between Kenya and landlocked Uganda are also transit points for smuggling.

> Wildlife traffickers take advantage of the gaps in law enforcement along the shipping supply chain to evade detection," said Allan Mashalla, East Africa Regional Co-ordinator for the NGO Traffic based in Arusha, Tanzania. "The ICDs, where the cargo is packed, are especially vulnerable transport nodes."

From 19 November – 3 December 2022, Allan Mashalla and Martin Ojok, Customs Supervisor of the Uganda Revenue Authority, led an assessment of wildlife crime vulnerability at Mombasa port and its key transport nodes including Busia One Stop Border Post (OSBP), Malaba

OSBP, Nairobi ICD, and Kampala ICD to determine whether law enforcement officers and private sector there have the knowledge, skills and tools they need to prevent, detect and respond to wildlife crime.

The Solution: Assessing a port's ability to respond to wildlife crime

The Port Monitoring and Anti-Trafficking Evaluation tool, or PortMATE, is an assessment tool, focused mainly on ports, designed to complement the ICCWC Analytic Toolkit and Indicator Framework for Combatting Wildlife and Forest Crime, which broadly assesses national responses.

PortMATE is a more targeted assessment that can complement national assessments, providing a rapid yet comprehensive analysis of a port's ability to prevent, detect, and intercept wildlife and other illicit trafficking, its strengths and weaknesses, along the maritime supply chain.

The open-source tool is readily available online to any government, business, multilateral agency, or NGO. It can be used on its own as a stand-alone exercise or together with ICCWC's toolkit. Specifically, PortMATE expands on Questions 12 and 13 of the ICCWC Indicator Framework, assessing whether customs and law enforcement at ports of entry and exit are aware of and trained in detecting and responding to wildlife crime and whether they have the equipment, tools and materials they need (for example sniffer dogs, scanners, identification manuals) to do so.

As a collaborative tool, PortMATE has the added value of gathering information from many different port stakeholders committed to work together to better detect and prevent wildlife trafficking, share intelligence, conduct seizures, and build strong cases that will ultimately dismantle the criminal networks.

Originally crafted by UNDP in 2016, then revised by the Wildlife Conservation Society in 2018, the tool was piloted in Indonesia as part of the GWP project Combating Illegal and Unsustainable Trade in Endangered Species, and then finalized under the Reducing Maritime Trafficking of Wildlife project. Feedback from port stakeholders and lessons learned from previous applications of the tool in Indonesia and the Democratic Republic of Congo were incorporated.

> Misha Paltsyn, the project technical advisor at UNDP, said the goal was to develop "a simple yet professional tool, that's easy enough to be used by different projects or organizations at port-level to provide a good picture of current port's capacity to combat wildlife trafficking and identify the key gaps."

Paltsyn also explained that the tool is easily accessible and can be customized to local contexts and needs, e.g., for assessment of domestic ports, border posts, and even airports.

> The PortMATE Tool is not set in stone," he said. "It can be tailored to different port contexts to generate a more effective assessment, and hence, achieve better outcomes."

While the tool does not allow for a deep dive, its value lies in being able to provide a quick yet comprehensive overview of any gaps at ports that do require an in-depth look. These can then be prioritized for future action and investment.

PortMATE Features

- Fast and simple self-assessment
- Easily accessible, open source
- Identifies key gaps in a port's capacity to combat IWT
- Develops evidence-based recommendations
- Ideal for monitoring progress of port's capacity
- Standardized approach that can be tailored to local context

PortMATE: Findings from Mombasa

In the fall of 2022, Mashalla and Ojok rolled-out the new self-assessment monitoring tool at port-level at the Port of Mombasa in Kenya, working with Kenya Revenue Authority, Kenya Port Authority, Kenya Wildlife Services and other stakeholders, including wildlife NGOs and the private sector.

After preparing a detailed inception report and tailoring the methodology to the local context, Mashalla and Ojok travelled to each of the transport nodes, including in Busia and Malaba, along Kenya's borders with Uganda. With the PortMATE questions, scoring system and assessment framework in hand, they interviewed a wide range of stakeholders. "It was tricky to include wildlife NGOs and the private sector in the assessment, because the questions are not always relevant to them," noted Mashalla.

> "While the tool is very much focused on customs and law enforcement," said Mashalla. "It proved to be very useful in capturing all the relevant vulnerabilities at port level and along the Mombasa port supply chain, including border crossings with neighbouring countries."

Ojok said tools such as the PortMATE framework are very important for providing a standardized approach and baseline of good practice, for ease of comparison. He appreciated the standard procedures outlined by category to build a more effective response to wildlife trafficking at the ports.

> "It not only sets out the questions for scoring," he said. "It also provides examples of how these areas can be improved and strengthened."

Assessing customs and law enforcement response to IWT at the port level

9 categories with 52 questions

1. Electronic Customs Declaration System
2. Intelligence
3. Risk Profiling System
4. Container/Cargo Scanning
5. Container/Cargo Inspection
6. Investigation and Prosecution
7. Inter-Agency and International Collaboration
8. Employee Integrity and Anti-Corruption
9. Supply Chain Security

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Priorities for intervention in Mombasa

The PortMATE assessment at Mombasa Port and its transport nodes identified key areas for improvement, and a tailor-made action plan for capacity-building and technical assistance is in the works.

One of the key challenges noted by Mashalla was that personnel at transport nodes along the supply chain are not always aware of the latest modus operandi or concealment methods of wildlife traffickers and may unintentionally let illicit cargo slip through. "They may not interpret and analyse the image on the scanner and will consider it to be a clean consignment," said Mashalla. "When in fact, the illicit material is expertly hidden under legitimate products such as cow skins."

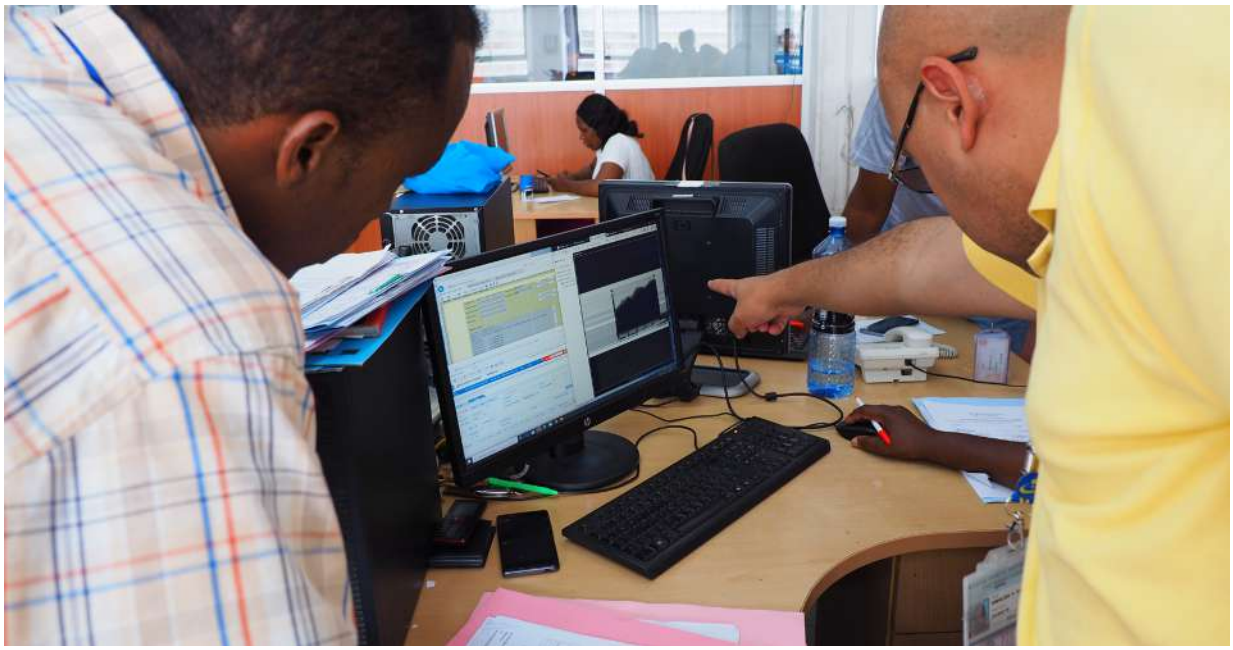
With the thousands of shipping containers that come through the port each day, port officials also tend to prioritize imports for risk profiling which generate revenue over exports. Risk profiling focuses primarily on imports to ensure revenue generation. Because there are no collections of taxes on exports, officials tend to focus more on imports.

Swalleh Faraj, member of the Mombasa PCU, says the team relies heavily on customs declarations, for inbound and outbound consignments. "There are hundreds of them, thousands. It's not practical to stop all of them," he said. "We extract manifests, screens consignments, look at risk indicators to determine which ones are suspicious enough to pursue, destination and origin are important parameters for us."

Canine units are used at Mombasa to verify suspicious consignments, but these are usually focused on detecting drugs rather than illicit wildlife products. Corruption and lack of security along the supply chain were also identified as drivers of wildlife crime.

A lack of interagency cooperation was another key gap identified during the PortMATE assessment. The head of Mombasa's Port Control Unit (PCU), Khamis Mbarak, agrees. He says that timely information sharing without the burden of bureaucratic processes between law enforcement, wildlife NGOs and the private sector is critical.

> We must build a united front across many different sectors to be more proactive, rather than reactive," he said. "By networking, building relationships and sharing information with our colleagues—whether in law enforcement, transport or shipping—we can work together informally and quickly to intercept shipments along the supply chain before illicit cargo even reaches the port."



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A new information exchange tool managed by TRAFFIC holds promise in this regard for the region. The Eastern-Africa Trade in Wildlife Information eXchange (TWIX) connects over 330 regional customs and law enforcement officials in four countries (Kenya, Uganda, Tanzania, and Djibouti) to help them share information and intelligence about wildlife seizures so they can cooperate more effectively across sectors and ports of entry/exit. TWIX is an online tool first established in Europe, then in Central Africa, followed by Southern Africa and Eastern Africa. Development for the Western Africa-TWIX is underway.

UNDP and TRAFFIC, along with other private and public partners, are committed to support national authorities to build their capacity according to the results of the PortMATE gap assessment and to measure their progress over time. According to Ojok, the PortMATE process has helped identify where best to focus resources and secure funding. "It helps that we have the evidence-based results from PortMATE," he said. "It's easier to justify the investment needed."

Mbarak very much appreciated the port assessment and looks forward to working with different sectors to find ways to address some of the gaps in addressing wildlife crime. "PortMATE was a very useful tool," he said. "It captured all the relevant gaps and helped us determine priorities for action and investment. I look forward to working with our new partners to secure funding and to continue to connect informally for greater collaboration in the fight to reduce maritime trafficking of wildlife."

Next Steps

A complete report of strategic and technical recommendations on the Mombasa Port and transport nodes is in production and has been shared with participants for their feedback. The report will help inform future interventions and collaborative actions for combatting IWT at the port level, both at Mombasa Port and in the region.

It will include recommendations for comprehensive training and mentoring in Mombasa and its transport nodes on CITES wildlife species identification, wildlife crime regulations, risk indicators, concealment methods and basic use of intelligence, as well as data and evidence collection. Delivery of "training of trainers" sessions and mentoring for Kenya Revenue Authority in Mombasa and Nairobi on the WCO Cargo Targeting System (CTS) application for automatic risk profiling of containers, which was recently installed at Mombasa Port is also needed (see Best Practice #5, Automated Cargo Profiling: Using Tech to Intercept Wildlife Traffickers at Seaports).

The report and a visual guide summarizing the vulnerabilities found at each of the five (5) transport nodes—Busia OSBP, Kampala ICD, Malaba OSBP, Mombasa port, and Nairobi ICD—will be available soon. Visit traffic.org.

Where will PortMATE be used next?

"The beauty of PortMATE is that it is open source, accessible to anyone," said Paltsyn. While it was developed to focus primarily on ports, it can also be applied for land border crossings and airports (as done for example in the Democratic Republic of Congo (DRC) in 2020). In the Philippines, the tool was used for assessment of both international and domestic ports.

"It can also be used informally to design port-specific projects or at workshops and other activities aimed at strengthening a port's capacity, because it provides a set of clear questions that should be asked." Paltsyn added. He said it is best to have a knowledgeable facilitator, well-versed in the maritime supply chain and ports, to provide support throughout the assessment process, "someone who is familiar with the ins and outs of port life."

The PortMATE tool was included as an attachment to the IMO guidelines that were approved in May 2022 to encourage port assessment and regular monitoring of progress (see BP #10, New IMO Guidelines to Combat Wildlife Smuggling on Ships).

PortMATE will also be replicated across countries implementing GWP projects with port-based interventions, enabling the tool to be used in both Africa and Asia.

And Mashalla said his TRAFFIC colleagues in South Africa are also interested in using the PortMATE tool to evaluate the seaports in their region, particularly the vulnerabilities of the transport nodes connected to South Africa's main port. Mashalla has been providing advice to them about how to replicate the approach, tailoring the tool for their needs. He says it will be an ideal, initial step towards building the capacity of the country and the region's port community. The idea is to identify key areas for intervention and develop an action plan accordingly, one that would deter traffickers from using the ports, knowing that it is more likely they will be tracked, detected and intercepted.

PORTMATE IN THE PHILIPPINES

In 2020, the ADB/DENR-BMB Project on Illegal Wildlife Trade (IWT): Combatting Environmental Organized Crime in the Philippines under the GWP also used the PortMATE tool to determine the readiness of its seaports to detect wildlife trafficking. After tailoring the tool to address the local context, seven seaports (4 domestic and 3 international) were assessed during workshops held online due to COVID-19 restrictions. A plan of action was produced to address the identified gaps and opportunities for intervention at the Port of Manila (North, South and Manila International Container Terminal); Lipata and Nasipit Ports and the Cebu Domestic and International Sea Ports. Click here to download a detailed report of the PortMATE assessment process and findings in the Philippines.

See **Annex A** to access the full PortMATE tool.

Port Control Units: Cooperating across Ports to Close Loopholes in East Africa

Port Control Units (PCUs), set up at strategic transit and exit points, such as seaports in Mombasa, Kenya and Dar es Salaam, Tanzania, have improved information and intelligence exchange among port authorities. Learn more about some of the challenges and promising practices of the newly established PCU at Zanzibar Port in Tanzania and how PCUs are helping to turn the tide on wildlife trafficking.

The Challenge: Screening for contraband in East Africa's busy ports

East African countries have had significant success in recent years in the fight against poaching and trafficking of wildlife, with strong political support to achieve zero-poaching, improvements in legislation, and stiffer penalties for wildlife trafficking. However, its seaports, especially Mombasa in Kenya, and Dar es Salaam and Zanzibar in Tanzania, remain highly vulnerable, as source and transit points for wildlife trafficking.

The sheer volume of the cargo that is imported and exported through these ports, linking East African businesses to the rest of the world, makes container screening extremely challenging and can easily result in suspect cargo containers slipping under the radar. This is further compounded by complex screening processes, sophisticated concealment methods, corruption, a lack of knowledge of endangered species, limited resources, and poor coordination between government agencies and the private sector.

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111 PCUs in 70+ countries, including Kenya (Mombasa seaport), Tanzania, and Uganda, with plans for expansion to other countries in Africa.

The Solution: Intelligence-driven, multi-agency units cooperating across borders

Countries in the region have begun to view these container bottlenecks at seaports strategically, as opportunities to target and intercept illicit cargo as it transits through their ports. Special multi-agency units, called Port Control Units (PCUs), have been set up at port-level to ensure cargo shipments are not used for any illegal activity and that legitimate trade flows smoothly (raising state revenues).

Made up of customs, law enforcement and wildlife authorities, these dedicated risk profiler teams monitor and identify high-risk shipments, inspect containers and seize contraband, including wildlife. They share intelligence across sectors and borders to address the different factors that enable wildlife trafficking.

PCUs are the brainchild of the UNODC and WCO. They were first established in 2006 at target ports as part of the UNODC-WCO Container Control Programme (CCP). There are now 111 PCUs in 71 countries worldwide, all of which are connected through a secure electronic platform called the ContainerComm, where PCUs can exchange sensitive information with their colleagues in other countries, alerting them to possible high-risk containers.

PCUs also have access to a search and tracking system for containers, which provides detailed information about the type of cargo, routing, freight payment methods and all the information needed to profile and identify high-risk containers.

PCU team members share intelligence from seizures to provide important insights into the identity and latest concealment methods of wildlife traffickers as well as source, destination and transit hotspots.

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> Sharing intelligence about seizures and suspect containers, exchanging operational techniques and keeping current on the ever-changing modus operandi used by traffickers is the only way we can stay a step ahead," says Edmund Landy Tei, a former law enforcement official and now CCP regional coordinator in East Africa."

Tei works at key seaports in the region to help set up PCUs and enhance the teams' risk profiling skills, including analyzing ship cargo manifests and other data to better identify high-risk containers, all while ensuring the smooth running of the port's legitimate business. "The dedicated risk profiling teams are usually located in a secure environment within the ports," said Tei. "They are composed of 6-10 frontline personnel from customs, police, and port authorities, as well as environmental and wildlife agencies." He explained that local government agencies select their own governance structure and their own preferences within PCU standard operating procedures, including staffing, management, and decision-making processes.

Strengthening enforcement at Zanzibar port

"The Zanzibar program is an important milestone in the region's efforts to secure its ports...and help curb the proliferation of smuggled goods throughout the region."

Edmund Landy Tei

As the region's larger ports step up controls, criminal activities will shift towards smaller, neighbouring ports. Several EIA investigations have found that weaker legislation in Zanzibar (a maximum penalty of six months' imprisonment or a $185 fine) was leading to increased trafficking. Additionally, Zanzibar port is a traditional transshipment point for illicit trafficking: between 2009-2018 the port was implicated in 8 wildlife seizures, including timber and 3,895 kg of ivory (TRAFFIC 2019). So, Zanzibar set out to secure its port.

Over three years in the making with support from the *Reducing Maritime Trafficking of Wildlife project,* Zanzibar PCU was officially launched in November 2021 to improve the smooth flow of goods and close the loopholes in the transit of illicit goods. The Unit is staffed by nine officers nominated by four different government agencies representing customs, police, port and wildlife authorities, namely from Tanzania Revenue Authority, Tanzania Police Force, Commission for National Coordination and Drug Control Zanzibar, and Zanzibar Ports Corporation.

Its establishment was organized in phases referred to by Tei as the crawl-walk-run approach. Following a needs assessment conducted in collaboration with UNODC/WCO experts, the new team first received theoretical training on various international legal instruments, risk analysis and profiling techniques, cargo inspection, information exchange mechanisms, port seizures and trade facilitation.

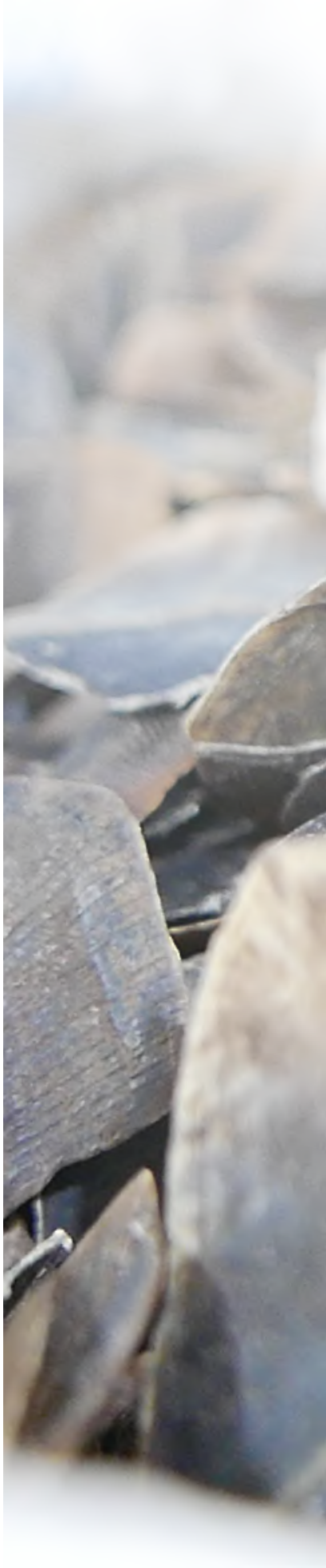
This was followed by hands on training in identifying and inspecting high risk containers. Specialized courses were then given by experts in the field to address various local needs and issues. For Zanzibar, this included training on hazardous chemical, biological, radiological, and nuclear substances (CBRNe), endangered species (CITES), handling of evidence, and infiltration of organized crime groups.

"Though it's just been a short time, we have gained a lot of experience," said Ayubu Mohamed Chinjala of the newly established Zanzibar PCU. "There used to be a lot of counterfeit projects in Zanzibar, but since we started, we don't see them anymore."

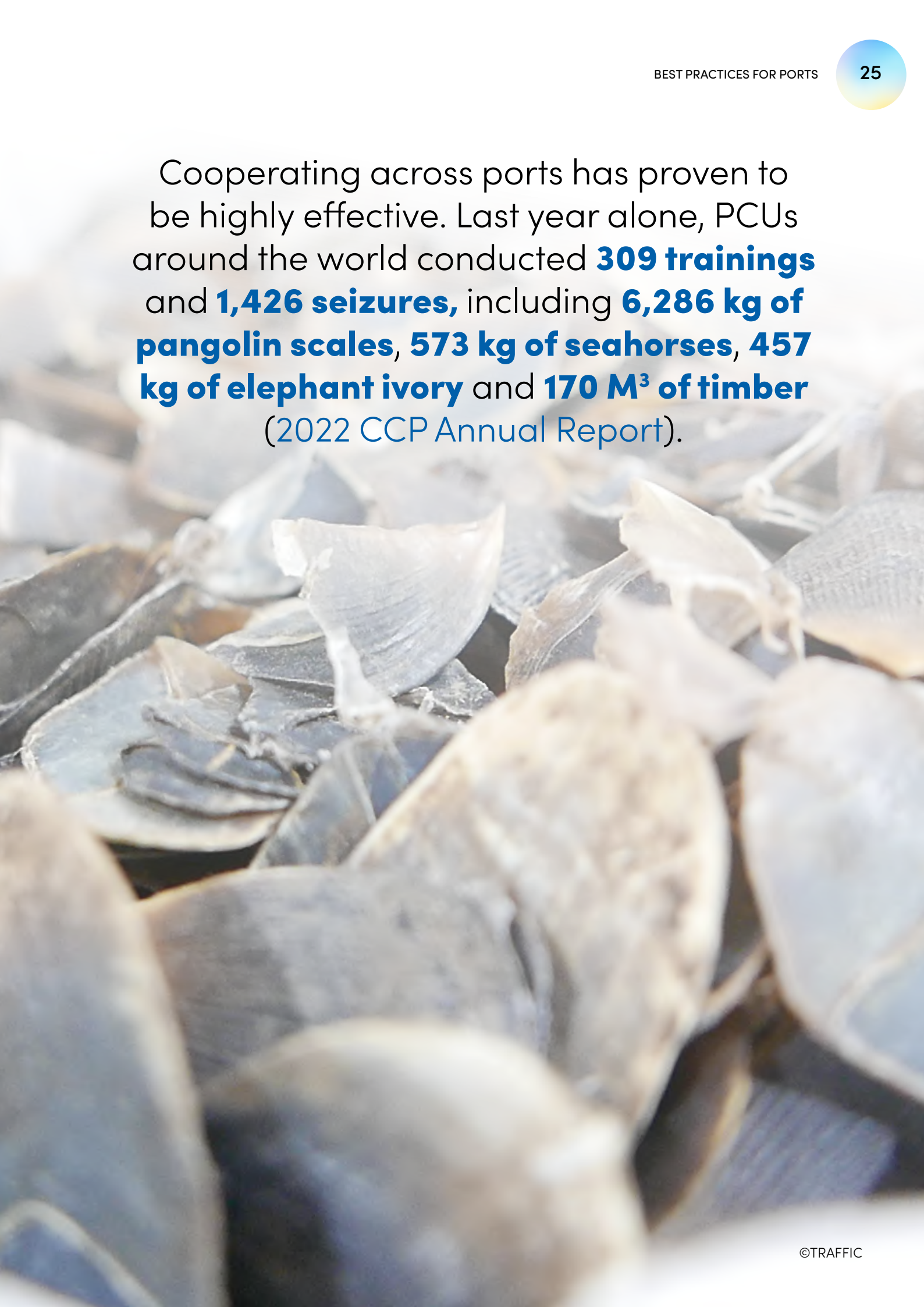
The unit has participated in exchange visits with other ports to learn first-hand from experienced law enforcement officials about different ways of operating and to build trusted personal relationships with their counterparts in other countries.

They have also met with local business, such as freight forwarders and shipping lines, to share red flags specific to the illegal wildlife trade that the private sector can incorporate into their own risk assessments.

Chinjala says the team requires more training and technical assistance to get up to par with similar PCUs in the region. He looks forward to more exchanges with colleagues across different ports in order to share intelligence and best practices for risk indicators. "As we get up and running, we will only be more effective."



Cooperating across ports has proven to be highly effective. Last year alone, PCUs around the world conducted **309 trainings** and **1,426 seizures,** including **6,286 kg of pangolin scales**, **573 kg of seahorses**, **457 kg of elephant ivory** and **170 M³ of timber** (2022 CCP Annual Report).



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Trainer as mentor

Tei spends time with each PCU in the region to evaluate their work methods, providing advice and refresher courses if needed. He regularly updates the team on new techniques and global trends including container identification, risk indicators, analysis of commercial documents, concealments, seal tampering, trafficking routes, modus operandi for trafficking, gender, human rights, and corruption. Officials from other PCUs in the region often attend the trainings including from PCU Dar es Salaam, PCU Kampala, and PCU Mombasa.

Lilian Rwegasira, the dynamic team leader of the Dar PCU, says the specialized training she received was life changing. "Best experience I have ever had as a customs operations officer," she said. "The training gave me knowledge I did not have—on risk indicators, risk profiling, how to identify different wildlife species and how to communicate with neighbouring Kenya and Mozambique so I can pass information on to my colleagues before the cargo even arrives on their side. "Regular training and mentorship ensure the sustainability of the program, helping establish and maintain contact among participating PCUs across the different countries in the region, said Tei, who also works to garner political support, funding, and local buy-in.

PCU Impact: Cooperating across borders to disrupt maritime trafficking networks

Considering the worldwide network of organized crime, a united customs and law enforcement team cooperating across agencies, ports, and borders is critical in the fight against maritime trafficking of wildlife. This is one of the prime advantages of the PCUs—their ability to send and receive timely alerts and intelligence from other units in the region and around the world in a secure way, via ContainerCOMM, that would not compromise investigations.

> The beauty of the PCU is that it's a global network," said Chinjala. "We have that contact list, whether it's Brazil, Cambodia, or Vietnam. If intelligence comes late, and the suspicious cargo is destined for another port, we can alert them."

Regwasira recounted a recent seizure of tonnes of rosewood timber last December that did not have CITES permit. "Our colleagues in Mombasa alerted us about the 22 containers coming from Kenya on their way to Dubai," she explained. "With their collaboration, we were able to track the vessel transiting our port and pull off those containers."

Another recent seizure of elephant tusks and lion claws at the Dar es Salaam airport in March 2023 was also intercepted on its way to Malaysia. "Thanks to a quick call from our colleagues at Mozambique customs, we were able to head out to the airport and uncover the elephant tusks and lion's teeth and claws."

Security Officer, Ivan Kagamba, also hailed the cooperation with colleagues in other ports and the importance of sharing intelligence. "What happens at the airport can also happen at the port."

He said, "The lion teeth and claws were hidden in lobster and crab shells (langosta) and suggested to us a whole new modus operandi for lion poaching. This helps us to better monitor and detect the practice at the port." The experience at the airport has put the PCU on high alert for similar methods at the port, making these products risky to move and transport.

In East Africa, lion populations have decreased almost **60%** in the past two decades. The lion is listed as vulnerable on the Red List of the IUCN and in CITES Appendix II.

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Challenges for PCU officials

While PCUs in Zanzibar seaport and across the region continue to improve their risk profiling skills, they also face a number of challenges.

- The inspection of containers meant for export are often viewed as low priority for customs compared to inspection of imports that translate into revenue generation. This means that containers used to traffic wildlife from Africa may not receive the kind of attention or scrutiny needed from customs, especially in cases of combined illicit/legitimate cargo shipments.

- Customs and law enforcers are more likely to be appreciated for increasing revenue rather than for detecting and intercepting illicit wildlife to better protect the region's biodiversity and the health of its citizens. For example, illicit trade detection/interception could be included in key performance indicators for customs to increase staff motivation.

- Full export documents and cargo loading lists from shipping companies are often provided only after containers have already been loaded onto a ship and therefore are no longer available for inspection. And without secure examination facilities to guard, open and inspect containers—such as exists at Namibia's principal port, Walvis Bay, which has a bonded warehouse for inspection—containers that have been flagged for suspicious cargo must be inspected in full view of a busy and very public port.

> It's a challenge to maintain confidentiality of intelligence at the port," said Regwasira. "Information gets out and can jeopardize our efforts to secure a container." She explains that having the PCU has made it easier to coordinate everyone at the port, and trainings have also helped everyone at port level to realize the importance of confidentiality of information to ensure the integrity of an ongoing investigation."

Other challenges faced by PCUs include high staff rotation, lack of resources, lengthy decision-making processes, and in some cases harassment of PCU officials by organized crime groups.

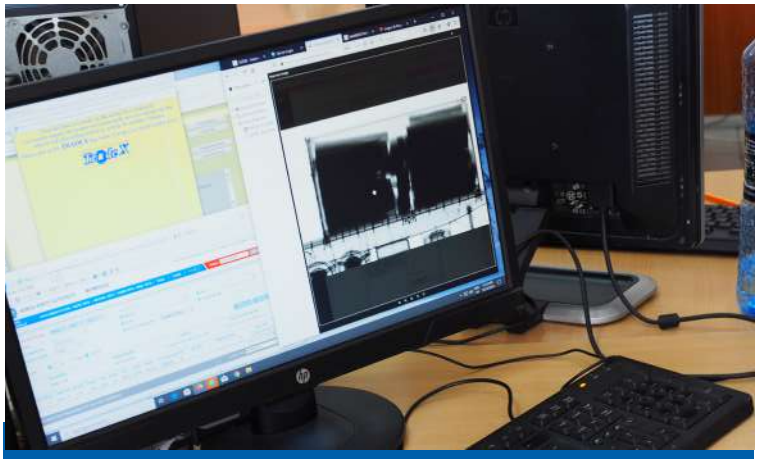
Next Steps

PCUs have proven to be highly effective in building a united front against trafficking in seaports globally. There is greater awareness and understanding of the various roles of different stakeholders along the maritime supply chain as well as regular communication and collaboration between them, all of which is helping to strengthen ports' overall strategy to counter the illegal wildlife trade.

The WCO Cargo Targeting System helps PCUs analyse electronic data from the ship manifest in advance, before a ship berths in their port. In Dar es Salaam and Zanzibar Ports, work has begun to adopt RiskPro, an automated risk profiling system similar to CTS, which is able to scan thousands of containers within minutes to detect illegal cargo. Regwasira is looking forward to shifting from the port's manual profiling to the automated system. "It will save us so much time," she said. "By sifting through hundreds of files of data, it will filter out all of the unnecessary documents and give us exactly what we are looking for." See Best Practice #5, Automated Cargo Profiling: Using Tech to Intercept Wildlife Traffickers at Seaports).

In addition to Tanzania, neighbouring countries such as Uganda and Mozambique are also exploring opportunities for advance receipt of full cargo manifest and other cargo documents from shipping companies, automated risk profiling systems and related training in their seaports. These tools are essential in the fight against IWT as they simplify and enhance the speed at which they can analyse risk and ensure port security.

PCUs at seaports across East Africa are also working to increase collaboration with the private sector to close loopholes along the maritime supply chain. Clearing agents, shipping lines, terminal operators and freight forwarders directly involved in container stuffing can provide intelligence on suspicious containers and data on exports and imports (such as invoices, bills of lading, ship manifests) ahead of time.



"PCUs are dedicated risk profiling teams. They work together across sectors and borders each and every day sharing information to better detect and intercept high-risk cargo."

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Regwasira looks forward to further opportunities to connect with different port stakeholders and other customs officials around the world, especially informally. "Building alliances is vital to the fight against wildlife trafficking," she said. "We must become even more creative in connecting across borders, by air, land and sea, to get the timely information we need to stop these criminals in their tracks."

The African Rat Pack: Detecting Wildlife Contraband in Tanzania

©APOPO

Dar es Salaam seaport in Tanzania recently put six African detection rats to the test, garnering critical insights into how rats, with their keen sense of smell and agility, can support existing screening methods for maritime wildlife trafficking. The rats spent a month at the port, searching shipping containers for wildlife contraband, such as pangolin scales. The results were promising and revealed that real-world deployment is not only feasible but an excellent return on investment.

Only **2%** of the **1.78 million** containers shipped every year are checked by authorities (UNODC).

©APOPO

The Challenge: Container inspection is expensive, time consuming and disruptive to legitimate trade

Large quantities of endangered wildlife products, such as pangolin scales, rhino horn, ivory, and hardwood, are trafficked by sea, concealed among the millions of cargo containers shipped every year. Of these, only 2% are checked by authorities (UNODC).

Despite increased cargo profiling and enforcement efforts, the busy Port of Dar es Salaam, which handles 95% of Tanzania's international trade, remains vulnerable to wildlife trafficking and struggles to keep up with the complex and ever-changing methods used by organized crime networks to evade detection.

Current screening methods are often expensive, time consuming, and disruptive. Customs officials must open and search every shipping container suspected of concealing wildlife contraband, as flagged by shipping manifests, handheld scanners or sniffer dogs. Each of these massive containers hold thousands more smaller items. It's much like searching for a "needle in a haystack."

African giant pouched rats have an incredible sense of smell and have sniffed out more than **150,000 landmines** to date and detected **25,000 cases** of tuberculosis.

©APOPO

The Solution: A non-disruptive and cost-effective screening method

An unlikely detection ally has recently risen to the fore with the potential to complement existing screening methods, and without disrupting legitimate trade. Much like sniffer dogs, the African giant pouched rat has a keen sense of smell with an additional ability to crawl into tight spaces. Weighing in at about 3lbs, these rats are large enough to be leashed, but also small enough to be lifted up to the vents of shipping containers to detect any illegally traded products before they head out to sea.

The African giant pouched rat, native to East Africa and therefore resilient to tropical disease, lives much longer than most other rats. Their average life span in captivity is around 8 years. The eldest retirement rat passed away when she was 11. On average, a detection rat's working life can span 5 to 6 years.

Thanks to the renowned APOPO Training and Innovation Center, a Belgian NGO based at Sokoine University of Agriculture in Morogoro, Tanzania, these African rats have become HeroRATS, helping to sniff out landmines and disease, such as tuberculosis. The APOPO team of scientists expanded its research in 2017 to tackle wildlife trafficking, training its rats to detect illegal wildlife products, such as pangolin scales.

The APOPO team breeds the rats at their facility. As soon as the rats are able to open their eyes, at roughly four weeks old, the training begins, first by getting them used to people, sights, and sounds, carrying them around in pockets and on shoulders. Then, in return for treats, the rats are trained to sniff out the scent of commonly trafficked wildlife, from plants to animals, eventually learning to distinguish their target scent from other camouflaging scents, such as coffee grinds, garlic, and candlewax used by traffickers to avoid detection.

In 2022, envisioning the potential for the rats to work within noisy environments where large volumes of illicit material are smuggled, often alongside legitimate goods, the team trained 16 rats in a controlled mock port environment, equipped with three shipping containers. The rats quickly learned different search systems darting in and out of containers, a line-up of items, or a grid of boxes sniffing out wildlife targets hidden within metal cases. The rats also learned to wear a vest and to trigger an electronic microswitch that sends an alert to their handlers when they have located their target.

APOPO's rats have proven to be highly effective in controlled environments. The challenge was to see how they tested in a real-life situation

The Field Trial: Deployment of detection rats at Dar-es-Salaam port

In March 2023, the top 6 rats in training were selected to undertake the first field trial at Dar es Salaam seaport in Tanzania to observe their scent detecting skills in a busy port environment. The trial would inform their training methods and operational protocols with the ultimate goal of deploying the detection rats as a standard screening method at Dar-es-Salaam port.

In the months leading up to the trial, APOPO worked in collaboration with the Tanzanian Wildlife Management Authority (TAWA) and the Port Control Unit (PCU) to develop interest, secure support, and gain permission from relevant stakeholders for testing the rats on real shipping containers.

> Getting into and working in the ports requires advance preparation," said Dr. Izzy Szott, lead researcher at APOPO. "It's not only that the port is really busy, but it also requires the collaboration of many different stakeholders and authorities."

She credited TAWA and the Dar es Salaam PCU for helping the team navigate the various levels of bureaucracy.

Lessons Learned: What works and what needs to be adjusted?

One of the biggest challenges for personnel at the Port of Dar es Salaam is the need to identify high risk containers with minimum disruption to legitimate trade. The field trial revealed that APOPO's detection rats are able to access shipping container vents, without personnel ever having to open or empty out a container in order to confirm it holds wildlife contraband.

Multiple rats can be unleashed at a time to navigate the many shipping containers in the port and access the small vents, potentially distinguishing an illicit shipment from a legitimate trade in minutes.

According to TAWA's Veronica Mallya, traffickers often conceal illegal wildlife inside the ventilation systems of refrigerated containers, making search strategies that target ventilation systems highly relevant. "An important part of Port screening methods is to be able to go into places where people or dogs can't reach," she said. "The detection rats were able to access small areas, such as the ventilation systems of the shipping containers. They can search inside containers as well as the items lined-up on the floor that have been unpacked from the containers or lined-up before stuffing."

©APOPO

First Field Trial at Dar es Salaam Port

Strengths

- Can access small spaces, such as shipping container vents
- Incredible sense of smell
- Non-disruptive to legitimate trade
- Able to work with different handlers
- Inexpensive to train and easy to house
- Unphased by loud noises
- Long working lives

Threats

- Day-time temperatures at the port
- Different container configurations
- No veterinarian clinic on site
- Rat backpacks shifted in transit
- Different scent for pangolin in large quantities
- Buy-in needed from multiple port authorities

Another promising trial result was that the rats were relatively unphased by the loud noises of the busy port around them. They adapted easily to different handlers, whether guided (tied to a long leash) or freely searching. Unlike sniffer dogs, who are very much focused on a specific person, the rats showed no significant difference in performance when working with different people.

Ivan Kagamba, Security Officer at Dar es Salaam Port, said port workers are all on board and ready to incorporate the rats as a viable screening method. He noted that the rats are a much easier sell in this region, where, due to cultural or religious beliefs, people are not always comfortable handling or working alongside sniffer dogs.

One crucial finding was the discovery that the rats' sense of smell registered larger quantities of pangolin scales differently from the scent of the smaller pieces supplied to APOPO by TAWA for the trainings.

> "Such small amounts (typically 1g) of pangolin likely smell differently than a larger amount (3 kg or more)," said Szott. "By providing the rats a range of quantities during training, we can improve scent performance and discrimination."

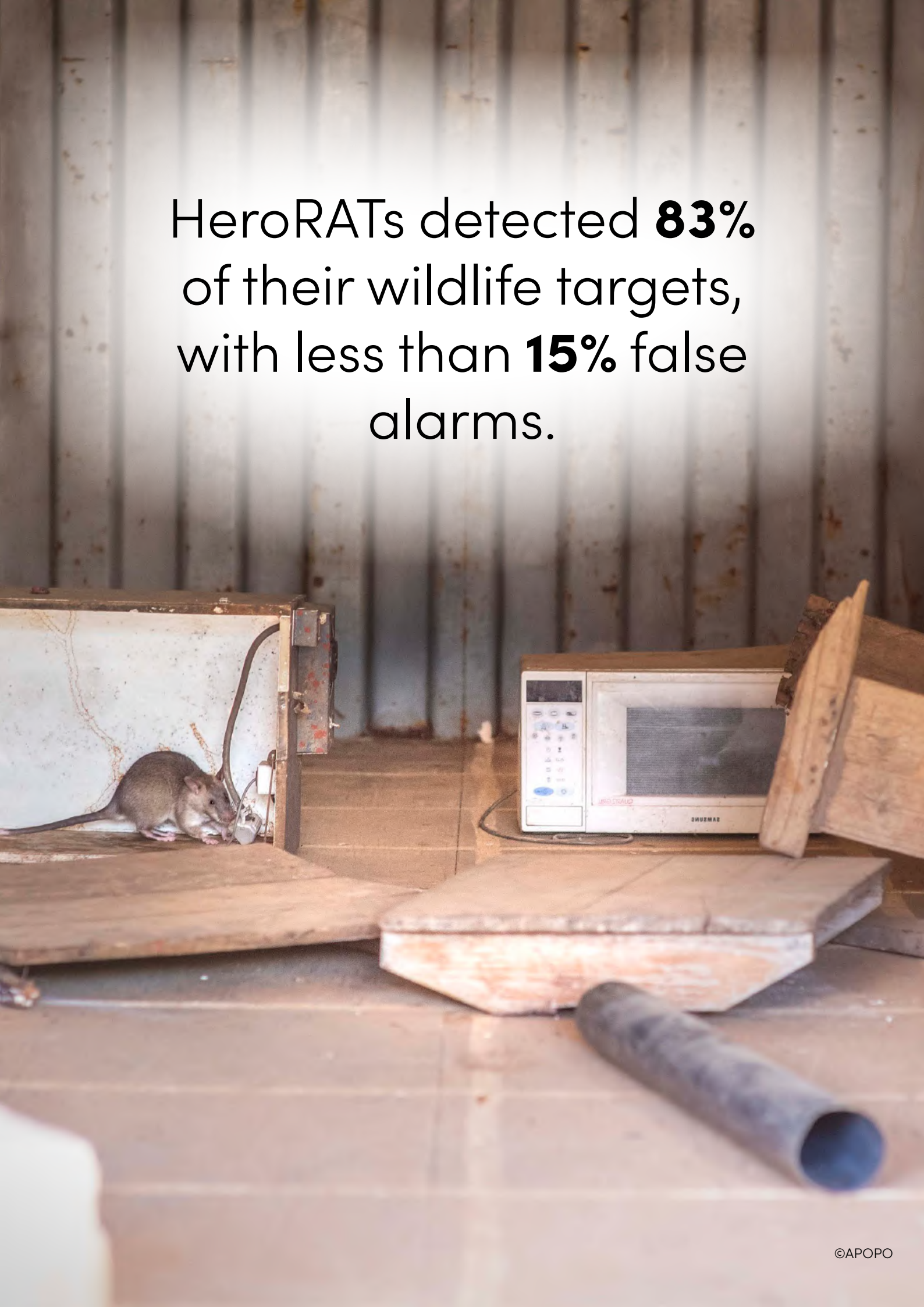
The temperature at the port, which quickly rose to 38 degrees Celsius by 9 a.m. every morning throughout the month-long trial, was another key challenge. Surrounded by concrete and heavy metal shipping containers, the nocturnal rats were not protected from the scorching heat and thus susceptible to skin cancer. The nocturnal rats would work best early in the morning or potentially late at night. According to Kagamba, arranging for the rats to be deployed outside working hours would not be a problem, especially in the face of intercepting high-risk cargo.

During the trial, APOPO also noted that the rats' prototype backpacks tended to shift as the rats scurried across the shipping containers and tight-fitting spaces.

Port Resources: HeroRATS are an excellent return on investment

Adopting the African Detection Rat as a screening method is an excellent return on investment. "They are very cost-efficient to breed, house and transport, which makes them a low-cost alternative," noted Szott. Their diet consists mainly of bananas and peanuts as well as grains, maize, nuts, fresh vegetables and fruit, and fish. A typical care routine includes feeding the rats, providing drinking water, cleaning the kennels, conducting weekly health checks, and providing preventive treatment for parasites. Veterinary care requirements are relatively small, according to APOPO. The rats also enjoy being petted, with time to relax and play in between work sessions.

APOPO breeds detection rats at their training facility to ensure the sustainability of the program and lends them out as needed. "Our rats are proudly Tanzanian," said Izzy. "They are born and raised in Morogoro and serve all around the world." Because the rats can easily adapt to different people, APOPO is able to train any new handlers to care for and cater to the specific behaviours of the individual animals.


HeroRATs detected **83%** of their wildlife targets, with less than **15%** false alarms.
©APOPO

Next Steps: Scale-up and real-world deployment

The rats showed a tremendous ability to detect wildlife contraband, and APOPO is now working to fine tune some of the challenges identified during the trial in preparation for real world deployment. "Our rats have exceeded our expectations with their skill and resilience," Dr. Szott said.

With a new litter in training and the empirical data gleaned from the port trials, the APOPO team is back in Morogoro perfecting their training facilities and search strategies. They are working, in particular, to closely mimic the loud and busy port environment, stacking the shipping containers in different ways at their facility and exploring various shipyards and storage facilities where they can expose the rats to loud noises. They are working with TAWA to obtain a range of quantities of pangolin scale to better match the level typically smuggled through the ports.

They are also redesigning the rats' backpacks to be more aerodynamic, so that they sit firmly on the rats' backs while in motion. A light will also be fitted to the backpack to ensure better visibility for the camera shots.

A subsequent trial will be held next year, given adequate funding, as a final step before deployment. TAWA has confirmed that they will provide training and testing aids to APOPO for the period of the operational trials and accompany APOPO on the ground during their daily sessions. If successful, the rats could become standard screeners at Dar-es-Salaam port as early as 2024.

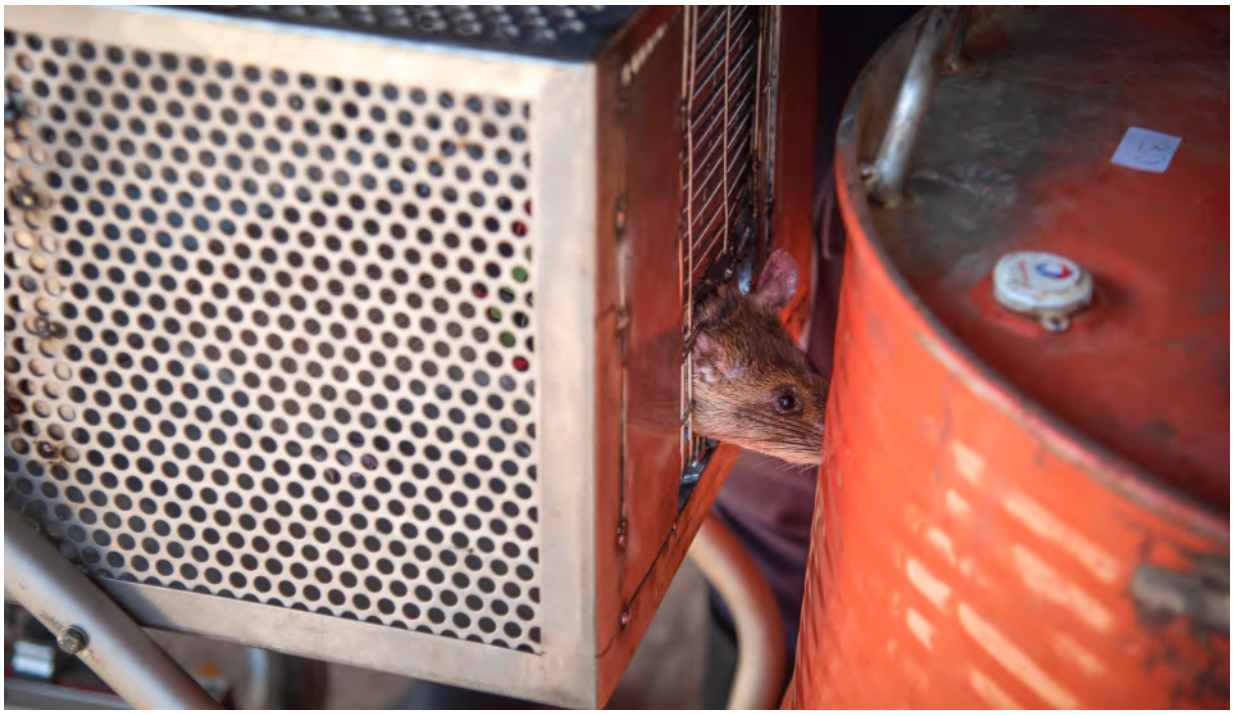
Looking forward, APOPO plans to scale-up the program, train more rats and bring them to other ports of entry around the world to curb wildlife trafficking. Training will also be expanded to include additional endangered wildlife products for detection.

In addition to the busy seaports, APOPO is exploring new places where their rats would be useful for detecting smuggled goods, such as at airports or land borders.

TAWA is also interested in putting the rats' skills to the test in the cargo area of airports, where they can be leashed and led through baggage areas to detect wildlife contraband.

The rats would be extremely useful for checking passenger baggage," said Kagamba, "especially between Zanzibar and Dar ports." He said this is something that a subsequent trial could put to the test.

There is huge potential for APOPO's HeroRATs to work within seaport environments to sniff out wildlife contraband. With continued support from partners and donors as well as the Tanzanian wildlife and port authorities, APOPO's rats could soon be a regular fixture at some ports and airports. Easier to house and much less expensive to train and take care of than dogs, the detection rats would be an important addition to screening methods at ports around the world, helping to disrupt trafficking networks and ultimately deter wildlife trafficking by sea.



©APOPO

APOPO plans to scale-up the program, train more rats and bring them to other ports of entry around the world to curb wildlife trafficking. Training will also be expanded to include additional endangered wildlife products for detection.

Easy to breed and house, the African giant pouched rat, seen here with lead researcher Dr. Izzy Scott (left) and research scientist Dr. Donna Kean (right), can live up to a decade, making detection training a good return on investment. ©APOPO

Automated Cargo Profiling: Using Tech to Intercept Wildlife Traffickers at Seaports

The Risk Profiler and the WCO Cargo Targeting System (CTS) are reliable computer programs designed to work with the electronic cargo manifests of major shipping companies around the world. They can profile thousands of containers in just a few minutes to detect suspicious cargo, that is likely to contain wildlife or other contraband. The Risk Profiler system was recently introduced to the Dar es Salaam Port Control Unit (PCU) in Tanzania. WCO CTS, a similar risk profiling tool, was introduced in Kenya in 2023.

©Kenya Revenue Authority

The Challenge: Slipping under the radar

Busy port authorities and customs agents work tirelessly to ensure both the security of container traffic and the smooth flow of legitimate trade. Each day they screen, profile and process the huge volumes of time-sensitive containers (import, export, and trans-shipment) that pass through their ports. Unfortunately, illicit wildlife products are often expertly concealed by traffickers alongside legitimate cargo and can easily slip under the radar, despite their best efforts.

Ideally, all containers on ships that berth a port would be risk profiled to determine whether they comply with international law, but this is not always possible, primarily due to a lack of resources, equipment, training, or availability of cargo documentation in electronic format. Manual risk profiling is still used in many ports in the region, but this method cannot keep up with the increasing volume of container traffic moving through the world's seaports today.

The Solution: Automated Risk Profiling

Automated risk profiling systems rapidly analyse import and export data in full cargo manifests to help identify suspicious cargo that is likely to contain illicit wildlife trade or other contraband hidden in legal shipments.

These computer programs work with the data from ships' electronic cargo manifests containing information on all goods exported or imported (such as code validation, geographic location, cargo names, consignees) to detect suspicious cargo as early as possible in the supply chain, at or before the port of departure. Within minutes, they can profile thousands of export, import, and transshipment containers to determine whether they require inspection.

Automated risk profiling systems also use risk indicators specific to wildlife trafficking to help detect suspicious cargo containers. These can include ports of origin and destination that are already implicated in IWT, commodity type (such as, wood or plastic waste are often used to conceal illegal wildlife products), suspicious companies or clients that could be or have been complicit in wildlife trafficking, inconsistencies in ship manifests and other trade documentation. There are a number of different automated risk profiling systems being used in ports around the world. The WCO Cargo Targeting System and the Risk Profiler are just two examples.

Risk Profiler (Risk Pro)

In 2016, Risk Profiler was developed by the Vungtau Port Control Unit in Viet Nam in 2016 and is now used by Viet Nam Customs nationwide. Risk Profiler was instrumental in intercepting three large illegal shipments, including the seizure of illegal wildlife products in Viet Nam's Da Nang seaport in 2019. Thanks to the Risk Profiler, Viet Nam's Da Nang seaport was able to intercept 9,120 kg of ivory (the largest seizure every made) and about 5,300 kg of pangolin scales (which had never been made in that seaport before).

In 2019, the Risk Profiler was installed on all Dar es Salaam PCU's computers and from 21 to 24 June 2021, PCU Dar es Salaam officers received training on the use of the Risk Profiler software. A practical review of the software was done with manifest data loaded for analysis using the software.

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Thanks to the Risk Profiler, Viet Nam's Da Nang seaport was able to intercept **9,120 kg of ivory** (**the largest seizure every made**) and about **5,300 kg of pangolin scales** (**which had never been made in that seaport before**).

Some minor challenges were found with the number of shipping lines mapped and search parameters as well as the need for a tailored format for export consignment targeting.

Crime in a Box: WCO Cargo Targeting System

WCO's Cargo Targeting System was designed for WCO members and is currently being used in 20 countries.

Developed with Customs, shipping and airline best practices and expertise, the initial investment and ongoing operating costs of WCO's CTS are very low.

The software is very user-friendly and can be installed within a couple of weeks. The entire deployment process takes roughly 12 to 18 months, including hardware and software installation, cargo manifest data assistance, training and piloting of the system.

Its key features include immediate access to electronic, pre-arrival, manifest data from shipping lines and freight forwarders. It applies consistent risk criteria to all cargo records and provides instant results to users.

Many countries lack the expertise and the finances to develop a comprehensive risk assessment system. While there are many products out there for customs to use, not all are affordable and sustainable. RiskPro and the WCO's CTS are basic tools that can get the job done, helping customs to focus on the high-risk cargo and ensure the flow of legitimate good through their ports.

The system has been developed by customs officers for customs officers.

Advance data is key for early detection of high-risk shipments. Automated risk profiling systems require export, import, and trans-shipment data to be provided in electronic format. To allow effective risk profiling and inspection, the electronic cargo documents, including full cargo manifests, should be provided to Customs in advance (e.g., before the arrival of the ship). PCUs that use CTS should receive cargo manifest information from carriers 72 hours prior to arrival.

Wildlife risk indicators need to be updated regularly by different agencies (such as customs, finance, police, wildlife, forest) based on the latest intelligence, concealment methods, trade routes, seizures, and changes in export/import processes. Customs officers and law enforcement also need regular trainings/ refreshers on wildlife trafficking modus operandi and red flags.

Strengthening enforcement at Mombasa Port

CTS was recently introduced to the Kenya Revenue Authority for use in its airports, land border and ports, including Mombasa Port in 2023. According to Khamis Mbarak, who heads up the PCU at Mombasa Port, "the CTS process is complete and fully connected to the KRA system, and training and mentoring on the use of the system for KRA and PCU officers is expected soon."

In the meantime, despite its limitations, the manual risk profiling is used to identify which goods warrant further inspection. Once cargo arrives at Mombasa port, roughly 5000 containers each day, Mbarak says his team works to identify high risk cargo and then prioritizes these for further investigation. It enables his team to be more strategic and efficient in the deployment of further resources.

He says shipments are identified as high risk by looking at indicators such source and destination countries, discrepancies in weight and cargo appearance, questionable paperwork such as the use of photocopies instead of original documents, incomplete information on the consignee or the commodity being shipped, unusual shipping routes, or a change in route once a ship has left port.

> NGOs, such as TRAFFIC, have been helpful in providing us with the latest risk indicators and modus operandi of wildlife traffickers," says Mbarak. "It helps us to be more strategic and efficient in the deployment of further resources, personnel, scanners and other tools, to those shipments that pose the greatest risk."

Next steps: Strengthening illegal cargo detection in East Africa

Training is essential in the fight against organized wildlife crime to help officers distinguish between a legitimate shipment and what may be a shipment that contains illicit goods, using risk profiling.

According to Mbarak, additional training of trainers' sessions and mentoring will be organized for the Kenya Revenue Authority in Mombasa and Nairobi on the CTS. Mentoring on Risk Profiler for the PCU in Dar es Salaam Port is also in the works to ensure effective and sustainable profiling of wildlife crime and other illicit and non-compliant shipments.

As global trade increases and ports in the region continue to expand, it will be important to an effective automated cargo risk profiling system. As criminals continually change concealment methods, risk profiling systems can be enhanced with the help of red flags specific to the illegal wildlife trade. See WWF/Traffic's Red Flag Compendium for Wildlife and Timber Trafficking in Containerised Cargo.

Pangolin is the world's most heavily trafficked mammal. Its scales are used in traditional Chinese medicine and its meat is considered a delicacy in Southeast Asia.

Securing the Maritime Supply Chain in East Africa

The East African Community's (EAC) Authorized Economic Operators (AEO) Program focuses on the traders along the shipping supply chain, providing training sessions to ensure both business and government are engaged in the prevention and interception of illegal wildlife trafficking.

©TRAFFIC

The Challenge: Weaknesses in the maritime supply chain

Legitimate maritime transport and logistic operators such as container shipping companies, freight forwarders and vessel owners along the supply chain may, unknowingly or knowingly, enable the trafficking of wildlife and other illegal products, such as drugs and firearms. They may accept a bribe to look the other way, falsify shipping documentation to speed up a shipment or simply discover that their legitimate cargo has been used to cover-load illicit material.

Savvy cartels are using increasingly sophisticated methods and routes along the commercial supply chain to smuggle their goods to markets overseas. And companies, especially small and medium-sized enterprises (SMEs), are at risk.

In response, local customs and port authorities have increased inspections and scanning of containers, especially those suspected of carrying illegal goods. But this often causes delays or disruptions in the flow of goods and leads to higher transportation costs.

The Solution: Rewarding reliable, trusted traders

In 2008, in the face of increasing trade and vulnerability to traffickers, the EAC regional Authorized Economic Operator (AEO) Program was launched to boost efficiency, ensure the security of the shipping supply chain, and reduce the flow of illegal cargo. The program is voluntary and covers the EAC countries of Burundi, Kenya, Rwanda, South Sudan, Tanzania, and Uganda. It works by giving "Trusted Operator" status to companies that carry out multi-layer supply chain security programs, based on the WCO SAFE Framework of Standards.

WHAT IS THE WCO SAFE FRAMEWORK OF STANDARDS?

In 2005, in the aftermath of the 9/11 terrorist attacks, WCO member countries developed a set of recommendations to customs organizations to help promote supply chain security, promote revenue collections and facilitate trade worldwide. SAFE has three pillars: the first addresses customs to customs standards, the second customs to business standards, and the third address standards for cooperation between Customs and other government agencies. The AEO program falls under the second pillar, giving trusted operator status to those who follow standard security procedures to ensure safety of the supply chain.

©TRAFFIC

200 companies in the AEO program in the East African region

The first companies signed on in 2015. There are now over 200 regionally recognized companies, including 23 in Burundi, 27 in Kenya, 84 in Rwanda, 27 in Tanzania, and 39 in Uganda.

"If you are awarded AEO status, it means your systems are secure," said URA Customs Supervisor David Dongo. "You are recognized as a low-risk company that can be trusted by customs."

By helping to secure the supply chain, trusted traders enjoy a number of benefits, including priority clearance of shipments at ports, fewer inspections, tax refunds, automatic license renewal, and other incentives not to mention the value of enhancing a business's reputation as a responsible and efficient service provider.

The AEO programme flips the usual narrative on its head, focusing on the traders and their systems and processes rather than the goods themselves.

AEO Eligibility

- Maintenance of business records such as books of account
- Record of compliance related to Customs and tax laws for at least 3 consecutive years
- Proven financial solvency
- Demonstrated application of internal security and safety control measures that ensure people, cargo, and document safety

For the full list of eligibility criteria, contact your respective Revenue Authority Customs Department.

To become a trusted AEO, a company must ensure end-to-end supply chain integrity, setting up a multi-layer system that addresses cargo security, physical access control, personnel security, security training and awareness, physical security, and information technology.

> The AEO programme is going to help us address the illegal trade in a very comprehensive way, by involving all the players in the supply chain," said Martin Ojok, who heads up the AEO programme at the EAC. "Simple systems like, for example, tracking cargo will allow companies to make sure no one can put anything illegal in your cargo while it is being transported."

AEO status is valid for three years, after which a performance evaluation determines whether status is renewed. Regular audits, intelligence gathering, and inter-agency co-operation are used to check that companies are still complying.

> AEO certification allows us to extend the privilege of fast-tracked cargo handling to our clients. It also boosts efficiency in the regional supply chain." said Jason Reynard, CEO of Bollore Transport & Logistics for East Africa.

While numbers stalled during the pandemic, more and more companies are getting on board.

Giftiana Laiza of the Tanzania Truck Owners Association praises the AEO programme for securing the shipping supply chain, making it more efficient and providing benefits to valued members.

> Becoming an AEO member enables the business holder to enjoy VIP treatment," she said. "The more companies are aware, the more ambassadors there will be to influence others to join."

AEO status comes with a certificate and a Memorandum of Understanding as well as a logo to use while dealing with customs. Within the EAC, there is mutual recognition of AEOs, so if a business in Uganda is AEO verified, they will reap the same benefits in Kenya, Tanzania, Rwanda and Burundi.

The region is also exploring opportunities to work with other countries, such as Australia, China, Japan, India and UAE to ensure that trusted exporters, importers and other logistics companies in one country will be recognized in another.

AEO Benefits

- Maintenance of business records such as priority treatment of operators
- Automatic release of entries
- No physical examination of goods
- Own choice of place for verification of goods
- Participation in customs initiatives
- Self-management of bonded warehouses
- Tax exemptions
- Reduced clearance time
- Reduced cost of doing business
- Expedited payment of refunds

The program increases transparency in the industry, giving customs peace of mind in clearing low-risk shipments, secure in the fact the traders have been vetted. AEO verified companies have also been taking their responsibilities seriously, making sure their supply chain is secure. Some have even dropped clients and alerted authorities to suspicious shipments.

The AEO program has reduced the cargo clearance time from a few days to a few hours

In the EAC, the programme has led to reduced clearance time from two days to four hours.

Increased awareness raising, sector by sector, and sufficient support for companies to implement the scheme are still needed. In June 2022, AEO trainings including a regional online course were held to explain the benefits of the program.

450 people have completed the Course on Wildlife Trafficking and Supply Chain Security (live and online sessions)

Other challenges lie in cross-border cooperation, particularly between different countries, where there are legal challenges to sharing data on operators. If operators aren't seeing the benefits of the scheme through reduced checks it undermines compliance.

Next Steps: Harnessing the power of business

Companies have an important role to play in the fight against illegal wildlife trafficking. "They know the problem doesn't start at the port," said Ojok. "They know it starts much earlier when the illicit cargo first enters the transportation chain."

Over **200 people trained** at EAC AEO in-person workshops held in Kampala, Mombasa and Dar es Salaam.

Elijah Mbaru Ndungu of the Institute of Chartered Shipbrokers believes the private sector plays an integral role and should be working in tandem with the public sector. "I strongly believe that the sharing of information is critical, he said. We in the private sector should report suspicious consignments to the authorities, follow due diligence in our paperwork, know our customers and vet our employees so we don't fall victim to criminal shippers." He also recommended moving into the digital world, with the adoption of automated processes and suitable IT infrastructures to ensure better co-operation.

Becoming a trusted AEO is mutually beneficial for both company and customs. It improves the turnaround time at ports. According to Washington Mwamburi, Uganda Country Manager for Express Shipping and Logistics East Africa, once the benefits are understood more widely, particularly the cost efficiencies, "it will help us to comply willingly; it is a good concept."

Know Your Customer: Identifying the Owners of Illegal Cargo in Kenya

A Know Your Customer (KYC) legal framework is being developed in Kenya to help keep tabs on the source, transit, and destination of illegal shipments of wildlife. Similar to the checks carried out by banks to curb money laundering, the KYC framework would bring transparency and accountability to the import and export sector of the country.

©Tamara Tschentscher

Mombasa sees roughly **1.5 million** TEUs of shipping containers annually.

The Challenge: Tracking illegal cargo shipments

Kenya is a primary gateway for international trade in the Eastern and Central Africa region. In particular, its busy international seaport, Mombasa, sees roughly 1.5 million TEUs of shipping containers annually. With so much traffic, the country remains a leading route for the illegal wildlife trade, with organized crime groups taking advantage of the weaknesses along the port's supply chain to smuggle their contraband to overseas markets.

A number of high-profile ivory seizures in the last decade (see Best Practice #8, DNA Forensic Analysis: The Hard Evidence Needed to Convict Wildlife Trafficking Rings) led to the creation of an interagency taskforce comprised of police, customs and port officials, prosecutors, financial investigation and anti-corruption units. Their collaboration across sectors was aimed at gathering the evidence needed to build strong cases for presentation to the courts. However, many of the investigations stalled, primarily due to the lack of ownership information on illegal wildlife shipments (EIA 2019).

"They hit a brick wall," said Katto Wambua of Space for Giant's Wildlife Law and Justice Department, an international conservation organization that works across 10 countries in Africa to help protect the remaining natural ecosystems and the wild animals they contain.

> Export/import agents, maritime operators, suppliers and brokers are not obligated to collect comprehensive information about their customers," explained Wambua.

Of the **14 ivory seizures** in Kenya between 2000-2017, **10 prosecutions** were started, but only one (1) case led to a conviction, which was ultimately overturned on appeal (EIA 2019).

©Uganda Revenue Authority

"So, most of the shipping containers seized at ports are attached to fictitious companies, making it very difficult to verify and track parties at either end of a suspicious consignment."

When Kenya's Wildlife Act was amended in 2015 to tackle wildlife crime by extending criminal liability to those who recklessly aid and abet the import and export of illegal wildlife products, it set the stage for the landmark *Know Your Customer* framework.

The Solution: Verifying a client's identity

Shamini Jayanathan OBE, a British barrister and former Director at Space for Giants, first presented the KYC plan to Kenya's Office of the Director of Public Prosecutions (ODPP) in 2018.

Traditionally used by banks to curb fraud and money laundering, the KYC framework would require export and import operators to carry out background checks on their clients, putting the onus on them to assess whether their services are being used to move illegal wildlife products.

In February 2020, the ODPP co-hosted with Space for Giants a national inception event attended by nearly 40 agency heads, representing 19 different state agencies and export agents, all of whom endorsed the development of a KYC legal framework to compel clearing and shipping agents to know their customers.

19 State Agencies Collaborate to Develop KYC Framework

- Ministry of Interior and Coordination of National Government
- Office of the Attorney General
- Office of the Director of Public Prosecutions
- Central Bank of Kenya
- Kenya Maritime Authority
- Kenya Revenue Authority
- Kenya Ports Authority
- Kenya Airports Authority
- Directorate of Criminal Investigation
- Kenya Law Reform Commission
- Ethics and Anti-Corruption Commission
- Kenya Wildlife Service
- Kenya Forest Service
- Kenya Fisheries Service
- Kenya Coast Guard Service
- Asset Recovery Agency
- Financial Reporting Centre
- Anti-Counterfeit Authority
- Multi-Agency Team

Why is it important to Know Your Customer?

"The criminals further up the chain don't end up in the courts," said Wambua.

Wildlife crime investigators often interrogate the local service provider, import/export agent or port authority, who has no real information about the people responsible for the illicit shipment.

"A legitimate exporter could lose business if their shipping container was found to have smuggled ivory," explained Shamini Jayanathan. "They could be found complicit, face prosecution , and lose their business licenses."

For example, in two separate cases, chipped ivory, which closely resembles polished macadamia shells, was hidden along legitimate goods and discovered by Kenya Customs. Increased inspections at the ports disrupted shipments.

End users were unable to sell the nuts by the "best before" dates. Loss of customer trust and higher product costs ultimately put the country's entire nut industry at a disadvantage. This in turn impacted smallholder producers and farmers, reducing their income.

What should marine operators look out for?

The KYC would be comprised of two key components to ensure maritime operators engage with legitimate customers who are not involved in illicit trade:

1. **Customer Identity:** Verify the customer's identity (legal existence, address, bank account, etc.) by using reliable, independent source documents, data, or information.

2. **Due Diligence:** Perform due diligence on the nature of the goods and services the customer provides, where they do business and the source of their funds, use your business networks to verify new customers.

There are a number of risk areas and red flags that maritime operators should be on the lookout for when it comes to the illegal wildlife trade, such as large cash payments from walk-in shippers who request a rush to avoid thorough background checks. Wildlife traffickers will often hide their identities behind a spouse or family member's name. They may also launder proceeds through front companies or on the side lines of legitimate businesses, including environmental or forestry resource fields, traditional medicine, the antique trade, furs for the fashion industry, or animal-related businesses such as aquariums, zoos, veterinary clinics, or suppliers of cages.

Next Steps

There is overwhelming consensus across Kenya's state agencies of the importance of developing a KYC legal framework specifically for trade facilitators in the import and export sector to curb illegal trade in and through Kenya. The draft framework, comprising provisions that can be absorbed by each relevant government authority into their own regulatory framework, will be shared with government agencies and private sector actors in Kenya for consultation and feedback. By December, it is hoped that it will be validated and signed by all relevant agencies. The validated framework will then be submitted to the government for enactment across the relevant regulations applicable to the sector.

In the meantime, though maritime operators are not yet obligated to carry out any KYC checks though many businesses and related associations have already started to develop verification systems to help ensure their customers are in fact who they say they are. Most do not see the associated costs to be punitive.

"It's just good business sense," said Salome Mwaifwani of the Containers and Inland Depots Association of Tanzania (CIDAT). "Not only does Knowing your Customer help improve overall security, but it also protects your reputation."

Setting an example for the region

As wildlife trafficking continues, a KYC legal framework adapted specifically for the shipping industry, the first of its kind in Africa, would go a long way in identifying and recovering assets from the illegal wildlife trade. It would ensure accountability, integrity and transparency in the shipping industry and help curb wildlife trafficking through Kenya's ports.

As the second busiest port in Sub-Saharan Africa, Mombasa Port and its KYC would set a strong example for other seaports across the continent looking to strengthen gaps in the shipping supply chain. "It would have a ripple effect," said Wambua. "With continuing threats of transnational wildlife trafficking affecting countries like Kenya and its neighbours, we all benefit from having the Know Your Customer processes in the shipping industry."

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DNA Forensic Analysis: The Hard Evidence Needed to Convict Wildlife Trafficking Rings

Forensic analysis of large-scale ivory seizures at the ports helps to identify criminal cartels and trafficking networks and provides unquestionable evidence against criminals in courts. Learn more about how to present and gather forensic evidence.

The Challenge: Tracking the cartels behind illegal wildlife shipments

While East African ports have become increasingly adept at detecting and seizing illegal wildlife parts smuggled through containerized cargo, seizures alone cannot secure a conviction. They require evidence that will stand up in court. Without a strong case, organized crime groups are rarely prosecuted, let alone convicted.

Recent advances in wildlife DNA analysis have been a game changer in the fight against wildlife crime, helping investigators and prosecutors identify poaching "hotspots" and trafficking routes and connecting cartels to local poaching operations.

Genetic analysis can help connect the dots in the illegal wildlife trade, linking multiple seizures to a common set of criminal cartels, but measures are needed to strengthen the capacity of local law enforcement to reliably gather and present forensic evidence that will stand up in court.

Genetic analysis can help connect the dots in the illegal wildlife trade, linking multiple seizures to a common set of criminal cartels.

The Solution: Using deoxyribonucleic acid (DNA) to connect the dots

Just as human DNA can provide powerful evidence in support of a prosecution, wildlife DNA analysis can give wildlife crime prosecutors the kind of credible, scientific evidence they need to secure convictions against organized crime groups.

Samuel Wasser, professor of biology and director of the Center for Environmental Forensic Science at the University of Washington, is the man behind a promising new tool in the fight against wildlife crime. Using DNA testing, Wasser and his team have been able to track and connect large-scale ivory seizures in 14 different countries to just a handful of transnational smuggling networks.

Their work, which was published in the February 2022 Nature Human Behaviour Journal, presents promising new possibilities for building slam dunk cases against traffickers.

Wasser first connected the dots through DNA research in 2018, after finding tusks from the same elephant in separate shipments. Because genetic markers are inherited, he discovered DNA can help identify siblings, trace geographic origin, and map out the movement of illicit cargo, even targeting it to a particular cartel.

> When we genetically link individual seizures to one another, it tells our law enforcement colleagues that all the physical evidence they've been collecting can be tied together and joined into a bigger whole," said Wasser. "It builds a much, much stronger investigation."

With DNA analysis, individual suspects already facing charges from a single seizure can now be connected to other seizures and face additional charges and stiffer penalties if convicted.

Wasser and his team have also been able to see shifts in the ivory trade over time through the DNA analysis. Trade routes that once ran through Tanzanian ports, for example, shifted to Kenya and then Uganda. Trade routes through Togo shifted to Nigeria and Côte d'Ivoire. New routes then opened up in Angola and Democratic Republic of Congo. They also found connections between all of these trade routes.

To be effective, DNA analysis relies on the willingness of countries to submit DNA samples for testing as close as possible to the time of the seizure.

However, investigations often stall after a seizure is made, because law enforcement lack the forensic techniques to collect and submit specimens to appropriate wildlife forensic facilities. Local law enforcement and wildlife authorities need to understand how DNA is used to trace criminal networks, how to gather and process wildlife DNA samples so they are admissible in court, and how to analyse the data to determine the species, and when and where it was poached, for building a strong case.

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Training: Collecting reliable forensic evidence

Over the past two years, Wasser and his team, including members from Kenya Wildlife Service, and the US Department of Homeland Security, have provided hands-on training on the use of DNA analyses to local law enforcement (wildlife, revenue, and customs officials) at trafficking hotspots such as Mombasa, Dar-es-Salaam, and Kampala ports.

Using ivory and timber samples from large, confiscated shipments, they ensure local law enforcement is properly equipped to follow up on seaport and airport wildlife seizures, conduct robust and validated DNA tests, help build strong cases and promote international cooperation on wildlife crime investigations. Participants are actively involved in the training, sharing their own valuable insights and information on recent seizures, arrests, and investigations on trafficking of wildlife across borders. One participant said, "The case summary shared during the course in Mombasa was a great example of how effectively DNA analysis can show linkages and connections between various syndicates, suppliers/facilitators/packers and seemingly unrelated seizures worldwide."

The training has the added benefit of establishing relationships and informal networks for better cooperation to help step up the fight against transnational wildlife crime in the region. Asha Chura of Kenya Wildlife Service said, "The training was practical making it easy to understand. The issue of transnational crimes and how to network with other agencies is paramount in our work putting in mind trafficking moving to higher levels of organized crimes."

How to collect an ivory sample for DNA processing — 2-day process

Sam and his team first weigh the tusks and measure the diameter of its base. They then lay out the tusks on the floor, arranging them from smallest to largest diameter, by colour, and then the distance from base to gumline (where the tusk tucks into the elephant's lip) to identify and exclude one of the tusk pairs. After sampling DNA from tusks that were paired or unpaired, they search the database for DNA matches to the same individual or to siblings among the tusks in other shipments.

The team cuts a 3cm x 3cm sample, at least 0.5 cm thick, near the base of the tusk, where the DNA is most concentrated. The sample is put into a machine that uses liquid nitrogen to help pulverize it into a fine powder.

Building capacity to use DNA evidence in court

Wasser also works with the Kenya Wildlife Service (KWS) Forensics Lab to build its capacity to interpret wildlife seizure results and provide testimony on forensic evidence in a Kenyan court of law.

Moses Otiende, who trained with Sam at the University of Washington for over 12 years, has also become a trainer and heads up the KWS Forensics Lab, ensuring law enforcement has the evidence it needs to prosecute wildlife crimes. Otiende and his team of scientists analyse the DNA from bushmeat, rhino horns and elephant ivory seized at the Mombasa port and other key exit and entry points across the country. Their findings identify not only the species but also its geographic origins. They can connect multiple shipments together and build a case that can hold up in court.

"Many traffickers are not prosecuted due to lack of sufficient evidence," said Otiende. "We're here to make sure the courts sentence them to the fullest extent of the law, including life imprisonment."

The KWS lab was launched in 2015, soon after the adoption of the Wildlife Conservation and Management Act, which introduced stiff penalties for wildlife crimes, to the tune of USD 2 million in fines and life imprisonment, for killing endangered species—a huge improvement from the previous $400 slap on the wrist for possession.

Kenya is only the second country in Africa (after South Africa at the University of Pretoria) to set up a wildlife forensic lab. The lab houses a national database of DNA sampling, and whenever it receives a DNA sample, it uses the international DNA sequence database for CITES-listed species at the University of Washington to connect the dots to other shipments and transnational organized crime groups around the world.

To prevent illegal trafficking of wildlife products, Dr. Otiende would like to see more training for law enforcement including police and customs officials, to make sure evidence is properly gathered and managed. He said the training should also be extended to prosecutors and the judiciary, so they are well versed with the seriousness and extent of IWT issues. "Currently, evidence handling is poor," said Otiende. "When the chain of custody is broken, it is difficult to bring evidence to court."

Despite a CITES directive calling on countries to send samples from any ivory seizure above 500kg, many countries are unable to comply as they lack the resources and knowledge to do so and because the costs for DNA analysis are prohibitive, running upwards of $250 for each specimen.

"Labs are also very expensive to run," says Otiende, who would like to scale up his lab and advance the use of DNA forensics data in the region. "We would like to expand and support our neighbours in Uganda and Tanzania and even in West Africa. This would require support for training personnel, updating equipment, and curating and properly recording datasets."

Next Steps: Closing in on the wildlife trafficking rings

> We all need to work hand-in-hand—scientists, law enforcement, NGOs, the private sector, and governments—to gather evidence, share DNA analyses of seizures and build strong cases to take down wildlife criminals and their networks. We have to make it as inhospitable as possible for them to operate."
>
> **John Brown III, US Dept. of Homeland Security**

Wasser hopes DNA forensics will help law enforcement officials target the leaders of these networks instead of low-level poachers who are easily replaced by criminal organizations.

"Trafficking remains very hard to stop," says Wasser. "Poachers operate in large areas they know well, and they're often better armed than wildlife rangers. Like other forms of organized crime, poachers tend to function solely as foot soldiers; arrest 10 in the field and 10 more pop up to fill their place. To make real headway, authorities have to focus on the players further up the supply chain."

Wasser would like to see greater support for wildlife DNA testing facilities, international cooperation and information sharing across borders. "It takes a highly collaborative community to disrupt and dismantle these cartels, who are not only involved in the trafficking of wildlife, but also in the trafficking of timber, arms, drugs, and people. We will need all of the forensic tools at our disposal, including financial records, shipping documents, anti-corruption measures, and DNA analysis, to support the long game."

For Otiende, a strong network of accredited wildlife DNA forensic laboratories would expose transnational organized crime groups and strengthen the cases against them. "Bilateral exchanges are also very important," says Otiende. "They enable us to move away from silos, to share information and to collaborate across sectors and borders to bring wildlife traffickers to justice."

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Wildlife Crime Financial Investigations: Follow the Money

Financial investigations can help identify and prosecute the kingpins behind illegal wildlife trafficking. Law enforcement officers in Kenya, Tanzania and Uganda were recently trained to follow the money behind large-scale African ivory seizures and build strong cases against transnational wildlife crime groups.

The Challenge: Laundering the profits from wildlife crime

The illegal wildlife trade is one of the most lucrative transnational crimes on the planet, generating billions in profits for wildlife traffickers, with very low risk of detection and prosecution.

Not only do organized crime groups exploit gaps in the shipping supply chain, setting up elaborate concealment methods and trafficking routes to move their illicit cargo, but they also use the world's banking and financial systems to launder their profits, so they appear to be legitimate sources of income. Their cleaned money then moves across borders and countries to fuel further corruption, illegal logging and poaching.

Following suspicious financial flows across borders and continents should be standard practice when investigating wildlife crime, according to Rod Khattabi, former United States federal law enforcement officer specializing in financial investigations such as tax evasion and money laundering. He says, "The huge amounts of money involved and the use of shipping containers for smuggling wildlife contraband all leave a clear money trail."

In East Africa, one of the biggest challenges is that many law enforcement officers lack the financial investigative skills needed to follow the money in the fight against wildlife crime. Financial investigation and asset recovery techniques are still rarely used by law enforcement officers in the EAC when dealing with wildlife crime, resulting in low conviction rates. This is an obvious capacity gap in wildlife crime law enforcement in the region.

> The biggest challenge to effective law enforcement in Africa is the inadequate knowledge and skills among law enforcement personnel."
>
> **Doreen Katusiime, Permanent Secretary**
>
> **Ministry of Tourism, Wildlife and Antiquities, Uganda**

Despite recent efforts to close this gap, current availability of training remains below the actual needs of government agencies. A recent survey by GFF among participating law enforcement officers found that 95% of officers in Kenya, Tanzania, and Uganda have limited knowledge and skills on financial investigation and asset recovery techniques and would benefit from trainings. Enhanced capacity for specialized investigative units such as Financial Investigation and Asset Recovery Units, and Customs, Wildlife and Forest Authorities and Police is invaluable for wildlife trafficking cases.

Khattabi, who now heads up the justice initiative on combatting transnational criminal organizations (TCOs) involved in human trafficking and environmental crimes at Grace Farms Foundation, works to bring together law enforcement, financial intelligence units, prosecution, judges, and the private sector (in particular banks and financial institutions) to build better, stronger cases against criminal syndicates.

"You have to go after the money," Khattabi said. "Any financial evidence that is collected is powerful documented proof that a crime has been committed and is difficult to refute in court, and if you seize their assets, you disrupt the whole flow of the organization."

What is Financial Forensics?

Financial forensics combines criminal investigation skills with financial auditing skills to generate leads, uncover wildlife trafficking operations and gather evidence of criminal financial activity for eventual arrest, prosecution and stiff sentencing.

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95% of law enforcement officers in Kenya, Tanzania and Uganda have limited knowledge and skills in financial investigations and asset recovery (GFF survey)

The Solution: Detecting and reporting suspicious financial transactions

> I have always disregarded cases involving illegal logging, but the experience and lessons here have made me view such cases differently and now I largely engage in such cases."

Lydia Kagori, Kenya Office of the Director of Public Prosecution

Over the past year, Khattabi has trained law enforcement officers in East Africa to follow the money behind seizures, so they may build stronger evidence-based cases against criminal syndicates.

Khattabi's practical, hands-on training sessions ensure they are familiar with the ways wildlife criminals move their money, their laundering techniques as well as the red flags related to IWT, such as the latest smuggling routes and modus operandi.

Regional trainings have taken place in Mombasa (Kenya) in March 2022, Arusha and Dar es Salaam (Tanzania) in May/June and August 2022, and Entebbe (Uganda) in February 2023 respectively. Other trainings of Controlled Delivery techniques with financial investigative lenses were conducted in Dar Es Salaam (Tanzania) in May 2023 and in Mombasa (Kenya) in June 2023. Another training is planned for Arusha (Tanzania) in the fall of 2023.

Hands-on training based on real-case scenarios

Using real-life examples, based on his many years in law enforcement investigating money laundering, counterterrorism, narcotics, organized crime, trade secrets, and commercial fraud, Khattabi shares some of the most effective and innovative financial investigative and asset recovery techniques that have been used to help bring down kingpins, including how to identify suspicious transactions and prevent the smuggling of cash across borders.

His trainings are organized in collaboration with the United States Department of Homeland Security, Homeland Security Investigations (HIS) and the Lusaka Agreement Task Force (LATF). LATF pools resources from regional member countries to fight against illegal trade in wild fauna and flora. LATF Director Edward Phiri lauded Khattabi's innovative curriculum, which customizes trainings to the needs of the different countries involved. "He hires local actors to role play as criminals and prosecutors; he rents houses and cars to simulate real scenarios," said Phiri. "Participants start from the controlled delivery, arrest and interrogations to surveillance and evidence gathering, ending with the presentation of their case to the prosecution."

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Participants also learn how to sample ivory with real ivory samples. Molecular biologist Moses Otiende, head of the forensics and genetics laboratory at the Wildlife Research and Training Institute at KWS, shows them a simple process they can all do immediately after a seizure and explains the importance of the chain of custody, from seizure all the way to his forensics lab (see Best Practice #8, DNA Forensic Analysis: The Hard Evidence Needed to Convict Wildlife Trafficking Rings).

Many of the instructors are hired locally to explain the law and teach about rules of evidence. Phiri explained that they collaborate with ODPP and the National Prosecution Service to do this. "We bring together not only investigators, but also prosecutors. It is so critical for them to understand what each are doing." Edward Phiri stressed the importance of building trusted relationships and understanding the needs and objectives of the different players along the criminal justice chain. He said, the transnational nature of organized crime requires cooperative law enforcement.

One participant described the training as "an eye-opener." As a prosecutor, she appreciated the simulated raid, and learning how investigators secure a search warrant and an arrest. She realized just how difficult the work of an investigator is, giving her a different perspective. She said, "I used to yell at them in court, now I see what they are doing out in the street."

According to Khattabi, money will exchange hands at every point along the way of a criminal transaction: the poacher will be paid, the middleman will be paid, the courier will be paid. While it's mostly cash at the beginning of the supply chain with poaching once the ivory moves along, the value increases and that's when multi-million-dollar transactions occur, which will then involve the international banking system. Banks also generate regular reports of suspicious activities which can be good leads.

Other red flag indicators include circuitous shipping routes that don't make commercial sense, using transit countries to throw of risk profilers in the destination country, using shell corporations, and involving accomplices in various shipping businesses.

Prosecutor Keffa Ndeke of the Uganda Wildlife Authority described Khattabi's trainings as cutting-edge. He credits them for improving the exhibits he brings to court and better understanding the roles of different players in building a strong case.

> In every criminal investigation, there will be an aspect of financial intelligence to help connect the dots," Ndeke said, "We cannot address poaching and wildlife trafficking without addressing issues of money laundering."

Financial investigations, through analysis of shipping records and fund transfers, can help build a picture of wider transnational networks spanning source, transit, and destination countries. They can help to identify the individuals and front companies involved.

Since financial investigations can be lengthy processes, often taking 6 to 8 months to complete, Khattabi advises law enforcement to begin as early as possible, submitting requests for information to banks and analyzing bank records.

According to Khattabi, transboundary investigations are even more complex and require cooperation between law enforcement units in the respective countries. Transnational wildlife trafficking networks will often maintain multi-country accounts and conduct financial transfers across geographic boundaries.

Many kingpins are based in Asia, where countries do not always cooperate. "If you run into any troubles, suggests Khattabi. "INTERPOL has the mandate to intervene across borders and can also be used to help catch them."

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Case Study: The Shuidong Connection

In a case that involved the trafficking of 62 tonnes of ivory from Tanzania to China worth over $130 million, no one was ever charged with money laundering. Documents showed substantial money flows between the two Chinese front companies (purportedly garlic and chemical importers) in Tanzania and companies in Hong Kong and mainland China. Lengthy jail sentences were handed down to the Chinese packers and the two Tanzanian dealers. Yet, despite all the evidence that was discovered related to illicit financial flows, nobody connected to the case was charged with money laundering and none of the Chinese kingpins have ever been caught.

Next steps

The training built trusted and strategic partnerships among a diverse set of stakeholders, increasing collaboration and intelligence sharing between law enforcement, customs and wildlife authorities.

Joseph Kwesiga of Uganda's National Forestry Authority Services said the training was very useful for uniting agencies and authorities, from different countries. "It has been very helpful to bring us together as a team against wildlife and forest crimes." He recommends extending the course up to at least two weeks to have enough time to gain even more understanding of the material and topics presented.

Khattabi also takes the time to follow-up with participants. He has established an informal network on WhatsApp and continues to mentor remotely and in person. The network often exchanges information and ideas.

Khattabi calls on governments to review their criminal legislation to ensure that law enforcement agencies are fully authorized to follow the financial flows related to wildlife crime and to prosecute money laundering offences. The private sector, especially banks and other financial institutions, also have an important role to play in detecting and reporting suspicious transactions. According to Khattabi, the combination of the public and private sector is a recipe for success.

> By working together, sharing intelligence across sectors and borders, following the money related to IWT, we can crack down on the trafficking networks that continually fuel this billion-dollar crime," said Khattabi.

To better target the criminal networks behind wildlife crime, he suggested wildlife investigative teams include financial intelligence units, which have long been used to address other serious crimes.

Investigating financial crimes requires multi-agency collaboration and funding. Khattabi suggests asset recovery can support these investigations, by sharing the seized proceeds of the crime with the various agencies involved, based on the percentage of work undertaken. Once reclaimed, these assets can be used legitimately to continue the fight against wildlife crime.

New IMO Guidelines to Combat Wildlife Smuggling on Ships

In May 2022, the global shipping industry adopted new guidelines to help bring down wildlife traffickers exploiting maritime supply chains. The new International Maritime Organization Guidelines on smuggling of wildlife through shipping highlight ways both government and the private sector can tackle this transnational organized crime, emphasizing due diligence, responsibility-sharing, and cooperation between all stakeholders in the industry. Learn more about the impact of the guidelines on the maritime sector and wildlife trafficking

The Challenge: Maritime chokepoints for wildlife trafficking

Wildlife trafficking is a growing concern globally, threatening not only biodiversity but also ecosystems vital for climate change mitigation, domestic and international economies, and the health of people and planet. As demand for illegal wildlife products rises globally, especially in Asia, organized criminal groups are increasingly taking part in this illegal activity, and they are doing so primarily by sea through shipping containers. They take advantage of weaknesses along the supply chains to transport large-scale shipments of endangered species, such as timber, elephant tusks, and pangolin scales undetected.

Organized wildlife traffickers see it as a low risk/high profit business. They take advantage of legitimate transportation services in areas where law enforcement is underfunded and focused on other illegal activities. They may for example conceal and falsely declare cannabis leaves as tea leaves, or hide ivory inside logs.

The illegal wildlife trade fuels corruption and provides a revenue stream that funds East Africa's organized criminal networks. With up to 80 percent of the illegal wildlife trade being shipped through the world's ports, the maritime industry has a responsibility to take action.

The illegal wildlife trade fuels corruption and provides a revenue stream that funds East Africa's organized criminal networks.

The Solution: Promoting due diligence and transparency in the maritime sector

In 2020, in response to a Government of Kenya proposal, Member States of the International Maritime Organization (IMO) took a bold step and agreed to develop guidelines specifically for the prevention and suppression of wildlife smuggling by sea.

They struck an informal working group, led by Kenya, and made up of the United Nations Development Programme (UNDP), World Wide Fund for Nature (WWF), Environmental Investigation Agency (EIA), TRAFFIC and United for Wildlife to develop draft guidelines that would target the transport routes used by traffickers and introduce best practices for the maritime supply chain to prevent and suppress wildlife trafficking.

The working group consulted and collaborated with a wide range of stakeholders, including government agencies, academia, the private sector, and the NGO community in the drafting of these guidelines, which aim to promote stronger due diligence, transparency and responsibility-sharing by all players in maritime transport. Their collaborative approach resulted in broad support from IMO members, observers and consultative organizations.

At its Facilitation Committee meeting on 13 May 2022, IMO adopted the International Maritime Organization Guidelines after receiving support from Brazil, Colombia, Germany, Tanzania, the Intergovernmental Standing Committee on Shipping (ISCOS), the International Chamber of Shipping (ICS), the International Fund for Animal Welfare (IFAW) and the International Organization of Airports and Seaports Police (InterPortPolice).

> "These guidelines present a gamechanger in the fight against the illegal wildlife trade. Through dedicated and expert support from IMO member states and partners, government authorities and companies can implement greater safeguarding measures to protect their employees, business, and nature, critical to protecting the integrity of maritime supply chains from operational, economic, security, and zoonotic health risks."
>
> **Dr. Margaret Kinnaird, Global Wildlife Practice Leader, WWF**

The guidelines focus on bringing down the illegal networks exploiting the maritime shipping industry to traffic wildlife. Part 1 provides information on the nature and context of maritime smuggling of wildlife, which species are subject to trafficking and the common methods used by traffickers to conceal illegal wildlife on ships. Part 2 provides recommendations for both government agencies and the private sector, calling for due diligence, responsibility-sharing and cooperation along the supply chain.

While there is no plan set out to monitor and evaluate implementation of the guidelines, member states do this at a national level and are asked to share their experiences.

From December 7-8, 2022, in Bangkok, Thailand, the All-Hands-on Deck workshop was held to explain the new guidelines and next steps in the process, see https://qrco.de/bdY5Sd.

Some governments are already starting to respond to them, carrying out a number of the activities recommended in the guidelines such as vetting vessels before registration, conducting background checks, scanning containers, creating multi-agency units, raising awareness of red flags, promoting the Know Your Customer Framework (see Best Practice #7, Know Your Customer: Identifying the Owners of Illegal Cargo in Kenya, deploying sniffer dogs, and introducing an electronic system of waybills, which are hard to change or forge.

Challenges for implementation

While the development of guidelines is clearly a step in the right direction, they do not have the force of a binding international agreement and require voluntary action by individual member states and maritime industry stakeholders.

Katherine Kithiki of Kenya Maritime Authority said budgetary limitations as well as the development and review of relevant legal frameworks were potential challenges. She said, "Some countries are yet to do anything in response to the guidelines, particularly those that are landlocked or focused on territories far away from the sea."

Countries agreed that raising sufficient financial resources to support mobilization to implement the guidelines will be a challenge. Other challenges come from: corruption, low capacity on species identification, insufficient international collaboration to tackle transnational crimes; lack of sharing information when often there can be silo mentalities amongst organizations and mainstreaming within the Blue Economy development agenda. Lastly countries described the challenge of incorporating the guidelines in law and aligning them locally.

> It is very important that ships have safe passage and operate without criminal exposure. Shining a spotlight on the illegal wildlife trade and having the IMO's member states bolster preventive and deterrence measures to combat illicit activities related to the illegal wildlife trade in maritime transport – will be of major impact not just in our country or region, but around the world."
>
> **Nancy Karigithu, Maritime lawyer and Kenyan ambassador for the maritime and blue economy**

Next Steps: Advocating mandatory regulation

Some countries reflected that more collaboration between the private sector and government is needed to implement the guidelines and that the guidelines need to be introduced into stakeholder training. Others identified the need to consider incorporating the guidelines in a general review of wildlife laws. Others still needed to become more familiar with the guidelines and create buy-in from the responsible authorities for their institutionalization.

Overall, more resources are needed to help implement the guidelines, including for risk profiling, intelligence gathering, financial investigation and asset recovery. Awareness raising to create buy-in and training on how best to incorporate the guidelines in wildlife law, and operational procedures at the port level and across the shipping supply chain are also needed.

Many governments, NGOs and maritime operators would like to see mandatory regulation and enforcement to ensure compliance and a level playing field.

In a separate initiative, the IMO's Facilitation Committee will consider a proposal to amend the Convention on Facilitation of International Maritime Traffic (FAL Convention), which is a legally binding document, to address wildlife trafficking.

This endorsement by the IMO, the United Nations' specialised agency, sends a strong message on the growing international engagement against the illegal wildlife trade (IWT) and its impacts not only on the health and well-being of wildlife but also on people, planet and prosperity.

"Join Our Team! Defend Our Wildlife" campaign uses football and telephone hotlines to reach workers at East Africa's cargo ports

Awareness-raising campaigns play an important role in wildlife conservation efforts. #DefendOurWildlife brought the voices of East African football stars to cargo ports in the region. Learn about the rationale for, benefits of and lessons learned from engaging football stars and celebrities as campaign ambassadors and using telephone hotlines to report wildlife crime.

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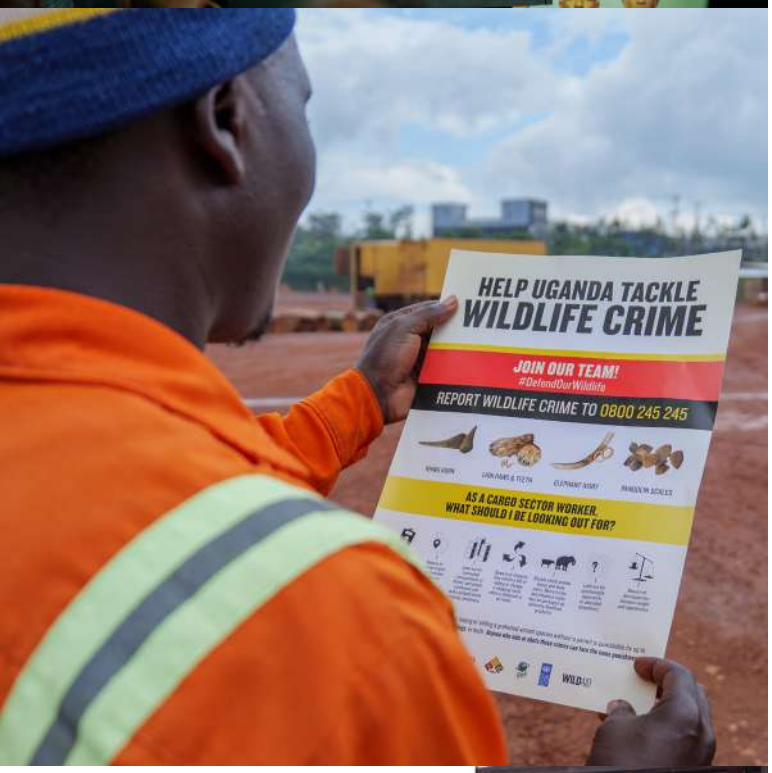
The Challenge: Consumer demand for wildlife on the rise

Consumer demand for illegal wildlife products is driven by a diverse set of social and cultural beliefs that vary from country to country around the world. Whether for use in "traditional medicine", clothing, food or as a status symbol, this demand has fuelled a surge in the illegal hunting and trafficking of Africa's wildlife and its export to Asia.

Many people are unaware of the atrocities that occur behind the scenes in the illegal supply of endangered species, including the killing of elephants, rhinos, pangolins and many more endangered species. Organised criminal gangs are making huge amounts of money for themselves, but in the process are stealing from all Africans.

Since many illegal wildlife products, such as elephant tusks and pangolin scales, are too bulky to send by air to their final destinations, traffickers are sending their shipments by sea, hidden between legitimate cargo inside shipping containers. Port workers, transport and logistic companies along the shipping supply chain unknowingly become complicit when their services are abused for illegal wildlife trafficking.

Raising awareness of the threats posed by the illegal wildlife trade are critical for reducing consumer demand in Asia and curbing the illegal trade out of Africa. When illegal wildlife products lose their appeal, when social acceptability turns, the demand for illegal wildlife products will dry up and so will the trafficking.



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The Solution: Communication campaigns to encourage a change in behaviour

Behaviour change communications can achieve impressive results, says WildAid's Maz Robertson, who specialises in designing mass media wildlife campaigns.

> More than just raising awareness of an issue, these campaigns set out to effect a change in mindset across a wide audience, and they are really good value for money."

Robertson says visual campaigns are especially impactful for reaching a wide audience, and that when you can affect public sentiment, that's when real change can happen.

After 1.5 years in the making, UNDP-WildAid's Join Our Team! Join Our Team! Defend Our Wildlife campaign launched in July 2022 in Tanzania, in August 2022 in Kenya and in September 2022 in Uganda. It ran for three months in Kenya and Uganda, with a five-month run in Tanzania. The ultimate goal was to reduce the illegal wildlife trafficking of wildlife through East Africa's ports. The campaign sought to reach a wider audience at port level and along the shipping supply chain, targeting 9,000-11,000 workers in and around three different ports: Mombasa in Kenya, Dar es Salaam in Tanzania and Kampala dry port in Uganda.

"We wanted to not only raise awareness about wildlife crime—why it's important and what people can do about it—but also to encourage a shift in attitude," said Tamara Tschentscher of UNDP, who heads up communications for the *Reducing Maritime Trafficking of Wildlife project*. "We hoped to affect a certain behaviour change with this campaign. By fostering a sense of pride in and responsibility to protect the country's natural heritage, we hoped to inspire a reporting mindset among port workers."

WildAid has long worked with celebrity influencers to get its campaign messaging across, while enlisting the help of popular international footballers was the brainchild of Tschentscher.

It was seen as a particularly effective strategy for attracting the attention of the predominantly young, male target audience at the port.

> Football brings people together; it creates a sense of unity and team spirit," she said. "We wanted to harness that enthusiasm for football towards increased awareness and reporting of suspicious activities."

The Kenyan, Tanzanian and Ugandan footballers appeared in a series of TV and radio ads, social media posts, billboards, posters, stickers and leaflets, lending their voice to the campaign to end wildlife crime through the region's ports and cargo terminals.

Campaign bumper-sticker ©WildAid

Under the slogan "Join Our Team! Defend Our Wildlife", former Harambee Stars captain Victor Wanyama, Taifa Stars forward John Bocco and Uganda Cranes defender Bevis Mugabi called on port workers and others along the maritime supply chain to make a difference by reporting wildlife crime, toll-free and anonymously. All materials were available in English and Swahili and showed commonly trafficked products and how they can be concealed in cargo shipments. High-level launches were organised, and videos were produced to attract media attention.

In their initial research, WildAid saw that similar campaigns had been done, though none had focused on the ports. "There were a few HIV awareness-raising campaigns during the 2010 FIFA World Cup that built on the enthusiasm for football to promote HIV testing", Robertson noted. WildAid's research also revealed that most port workers were unaware of wildlife laws and the consequences for them if they overlook trafficking of items, and the wider consequences for wildlife and livelihoods in the country. "Reporting levels were low," said Robertson, "and workers stated that they didn't know what to look out for".

The campaign team then conducted in-depth research on reporting cultures and existing reporting channels in each target country, making sure that safety of those reporting possible crimes could be assured and that tips would be adequately vetted and followed up on if determined valid.

They explored web-based reporting, mobile app and text messaging channels in each country. Online reporting was quickly ruled out, said Robertson, because the target group was unlikely to want to download a specific secure app to report crime, and more likely to use their phone to make a call instead. Any options that did not guarantee anonymity were also ruled out. Robertson said this would have been a deal-breaker. Public confidence in the security of the reporting channel and public confidence that action would be taken were critical to the success of the campaign.

Reporting options differed in each country, with Kenya having a dedicated national crime reporting hotline already widely accepted by the public. Calls are vetted and investigated through a multi-agency approach, with a communications team frequently advertising the hotline and informing the public about successful arrests being made based on the anonymous tips received.

WILDLIFE CRIME THREATENS OUR JOBS AND LIVELIHOODS
JOIN OUR TEAM!
#DefendOurWildlife
REPORT WILDLIFE CRIME TO 0800 245 245
WILDAID
WILDLIFE CRIME IS DESTROYING OUR NATURAL HERITAGE
JOIN OUR TEAM!
#DefendOurWildlife
REPORT WILDLIFE CRIME TO 0800 245 245
WILDAID
CAPITAL OUTDOOR
0772 201293
0772 701293
0700 645753

©WildAid

In Tanzania, the campaign opted to use the hotline of the Tanzania Ports Authority (TPA), which investigates anonymous tip offs involving the ports and passes on those outside their jurisdiction to relevant authorities.

Uganda did not have much of a reporting culture at all, said Robertson. The campaign opted to establish a completely new toll-free, anonymous wildlife crime reporting hotline with the Uganda Wildlife Authority (UWA).

These different situations posed a wide range of challenges for the campaign team and required tailored approaches in each country. But across all countries, investing considerable time in building relationships with agencies was key. Where relationships already existed, agreements were achieved faster than where relationships needed to be established from scratch.

"In terms of sustainability, the TPA hotline in Tanzania was a good option because it wasn't dependent on donor funding for continued operation," said Robertson.

The hotline in Kenya is a multi-agency effort, led by the Directorate of Criminal Investigations. It was set up with support from the UK government and opened in December 2020. It allows communities and workers to report suspected crimes easily and without repercussions. The call handlers are all police officers with investigative and intelligence backgrounds. They are trained in call handling, intelligence collection, interview techniques and are multi-lingual.

In Uganda, the hotline was set up at UWA headquarters in Kampala in the law enforcement office. Callers are not charged, and their identity is protected (ensuring anonymity), said Margaret Kasumba of Uganda Wildlife Authority. "People feel secure in that respect, as opposed to a mobile phone where everything about you gets displayed."

Kasumba described the need for standard operating procedures, better training on telephone operations and information handling. We can do better at probing hesitant callers she said.

"At the moment, the majority of the calls received are about human-wildlife conflict issues and poaching, rather than illegal wildlife trafficking, but we are hoping that will evolve as the campaign continues."

WildAid's 10 Guidelines for Running a Successful Communications Campaign

1. Identify the problem
2. Review previous campaigns for lessons learned and to avoid duplication
3. Engage partners in each country to support the campaign, e.g., by distributing materials or running the hotline
4. Determine your key audience
5. Identify communication channels
6. Craft the call to action
7. Keep your message clear and simple
8. Use consistent, eye-catching design
9. Time your launch
10. Measure your impact

©WildAid

The campaign reached **9,000-11,000 port-workers** across 3 countries.

97% of port-workers polled who had seen the campaign materials reported increased knowledge and awareness about IWT as a result of the campaign. They were also more likely to report wildlife crime as a result of the campaign

Both Robertson and Tschentscher highlighted the need to plan in considerable time from campaign inception to rollout. "Meetings and agreements with government agencies, technical aspects, and dealing with challenges along the way will likely take months", said Tschentscher, "even more for setting up a new hotline".

Campaign messaging also needs to be simple and clear, and who delivers the message is as important as what the message says, according to Robertson. For this campaign, WildAid distilled the messages down to four main areas: how wildlife trafficking affects jobs and income, how it affects the nation's natural heritage, and consequences in terms of related penalties. Information was also provided on what illegal products look like the campaign used footballers as they are popular with the target audience. Notably, they were not paid for the campaign so their participation reason couldn't be questioned.

Next Steps: Long-term engagement to reach more people

The Join Our Team! Defend Our Wildlife campaign reached between 9,000-11,000 port workers and received an impressive 11% social media engagement rate (the average is 2%).

The impact of the illegal wildlife trade (IWT) campaign was quite remarkable based on the feedback received from qualitative interviews. The use of footballers, the compelling design (using each country's flag colours) and the clear and simple messaging all resonated well with the target audience, engaging them to ask questions and learn more about the issue. The use of social media was also an extremely cost-effective way to reach a much wider audience and to raise the awareness of the general public, instilling a sense of national pride.

Security Officer Ivan Kagamba of Dar es Salaam port, was thrilled to support the initiative, helping to distribute the campaign materials, including leaflets, stickers and posters, at port level. "This is a great campaign," he said. "Using the footballers definitely helps raise awareness of the issue."

Designing a behaviour change campaign requires a specific skillset and expertise in order to be impactful, said Robertson. It takes continuous effort over a long

period of time. But she notes that it is one of the most cost-effective ways to reach a wide audience. "When you manage to reach the general public and affect public sentiment, that's when change can happen."

Tschentscher would like to see more behaviour change campaigns that work to reduce demand and put an end to wildlife crime.

She is pleased to know that the campaign has resulted in many meaningful partnerships across the region and that the work continues in Uganda, where WildAid is scaling-up and expanding the campaign to include more border points and cargo ports.

For more information on the campaign's approach, lessons and practical recommendations for similar campaigns, please see the case study "Combating Wildlife Crime through Awareness-Raising – Experiences from the UNDP-WildAid 'Join Our Team! Defend Our Wildlife' Campaign."

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Additional Resources Worth Browsing

The following publications, resources, and tools are available to help the shipping industry prevent, detect, and report the trafficking of wildlife through ports and along the entire maritime supply chain.

WWF/Traffic's Red Flag Compendium for Wildlife and Timber Trafficking in Containerised Cargo helps the sea cargo industry recognize the warning signs of corruption and the smuggling of CITES-listed species, including at-risk routes, questionable paperwork, consignments split across multiple shipments, last-minute requests for shipment clearance or sudden changes in routes or destinations.

ICCWC Analytic Toolkit and Indicator Framework helps governments measure effective enforcement responses to trafficking of CITES-listed species.

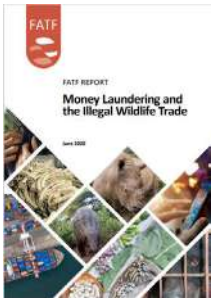
A number of awareness raising and training materials in multiple languages have been developed for the maritime supply chain, including industry associations such the International Federation of Freight Forwarder Associations (FIATA) and the International Air Transport Association (IATA), as well as individual companies to help employees prevent, detect, and report IWT. Visit www.routespartnership.org.

The FIATA prevention of wildlife trafficking free digital course arms freight forwarders with the info they need to protect their businesses from inadvertently transporting smuggled wildlife products and how to respond. The two-hour digital course is available in English; Chinese, French, Spanish, Portuguese, Arabic, and Russian.

The Trade in Wildlife Information eXchange (TWIX) is an online tool developed to facilitate the exchange of information and co-operation between law enforcement officers responsible for tackling IWT and implementing CITES.

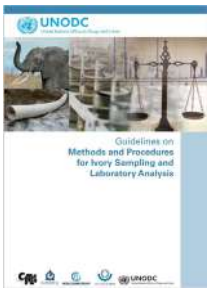
United for Wildlife's Transport Taskforce works with transport sector businesses to develop solutions to wildlife trafficking and encourages companies to join the fight against the illegal wildlife trade by signing the Buckingham Palace Declaration. See https://unitedforwildlife.org/taskforces/transport-taskforce/

EIA's Money Trails report identifies the financial flows that are linked to illegal wildlife trafficking.



Financial Action Task Force's Money Laundering and the Illegal Wildlife Trade

WCO SAFE Framework of Standards: http://www.wcoomd.org/en/topics/facilitation/instrument-and-tools/frameworks-of-standards/safe_package.aspx



UNODC, as a member of ICCWC, developed guidelines to support law enforcement through the use of forensic technology and laboratory data. See ICCWC Guidelines on Methods and Procedures for Ivory Sampling and Laboratory Analysis

For more information on the EAC Authorized Economic Operator programme, see https://www.eac.int/customs/eacaeo. The EAC AEO Standard Operating Procedure Manual is available at https://www.eac.int/documents/category/eac-aeo-operating-procedures and the course is available at https://aeoeastafrica.org/login/index.php.

Tools and Resources for Applied Conservation and Enforcement (TRACE) Wildlife Forensics Network.

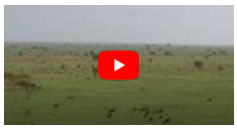
Combating Illegal Wildlife Trade through Ports Videos:

- Combating Illegal Wildlife Trade through Ports

- Money Trails Uncovered: Cracking down on wildlife crime through financial investigation

- Securing Wildlife and Trade – How Customs and companies in the East African Community join hands to fight the illegal wildlife trade (The EAC Authorized Economic Operator Programme)

- Capacity Building in Controlled Delivery Investigations: Collective action across borders to combat illegal wildlife trade



- Joining Hands To Combat Illegal Wildlife Trade Through Ports: Voices from Eastern Africa on best practices and needs

Looking Forward

With more than 80% of illegal global wildlife trade moved by sea, maritime transport networks and seaports play a considerable role in preventing wildlife trafficking. While there have been considerable efforts to stem this crime across East Africa, vulnerabilities still exist. It will take a concerted, collaborative and organized network of our own to seal existing loopholes within the shipping industry and disrupt this transnational crime.

©Tamara Tschentscher

As the best practices in this publication reveal, the challenges we face are complex and ever changing. There is no "one size fits all" approach to reducing maritime trafficking.

In order to take the down the transnational organized crime groups behind the trafficking of wildlife, we need a coordinated response—one that involves new and bold legislation, strong investigative techniques, open and transparent data, intelligence sharing, specialized skills, cross-border cooperation and private sector engagement.

No one sector or country can do it alone. We all have a role to play—from law enforcement, customs, and wildlife authorities to shipping supply chain companies and associations.

Over the past five years, the *Reducing Maritime Trafficking of Wildlife* project has supported many activities in Kenya, Tanzania, and Uganda, building strong and trusted partnerships among port stakeholders from government and civil society to the private sector. We have strengthened wildlife law enforcement at ports and increased cooperation between ports and other maritime stakeholders. We have leveraged resources and expertise, emerging with a deeper understanding of different stakeholders' objectives and needs.

Looking forward, we recognized the importance of sustaining these partnerships and scaling the best practices showcased in this publication. We recognize the importance of community dynamics, cross-border cooperation, innovative technological solutions, and increased transparency in the fight against wildlife trafficking by sea.

Criminal networks are extremely organized and so must we be.

We call on all stakeholders to scale their efforts in Africa and Asia and around the world, to support local efforts, especially at bottleneck ports, to disrupt criminal networks, and to close the loopholes along the maritime supply chain. By working together, hand in hand, across agencies and sectors, ports and borders, we can bring wildlife trafficking by sea to the lowest possible level.

Glossary of Terms

Alerts: This is an instrument used for seizures based on intelligence information. Alerts in the country of origin are designed to seize illicit goods before a shipment departs, while alerts in the destination country are designed to facilitate seizures on arrival.

Bill of Lading: a contract of carriage by sea, to evidence the taking over or loading of goods by a carrier, who undertakes to deliver the goods to the order of a named person/entity.

Bonded warehouse: a building or other secured area in which goods may be stored, manipulated, or undergo manufacturing operations without payment of duty.

CBRNe Material: This term refers to hazardous Chemical, Biological, Radiological and Nuclear substances not approved for commercial trade or transport.

CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora): an international agreement between governments which aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. See https://www.cites.org/eng.

Consignor/Consignee/Consignment: The consignor and consignee are terms commonly used in the trading and transport sector. The consignor is the sender of goods, and the consignee is the receiver of the goods (this can be the buyer or their agent).

Container Profiling: The identification of a high-risk container through the use of highly specialized technological equipment, software, risk indicators, and best practices.

Controlled Delivery: the technique of allowing illicit or suspect consignments to pass out of, through or into the territory of one or more States, with the knowledge and under the supervision of their competent government agencies, with a view to the investigation of an offence and the identification of persons involved in the commission of the offence.

FAL-Committee: The Facilitation Committee (FAL) of the International Maritime Organization deals with matters related to the facilitation of international maritime traffic, including the arrival, stay and departure of ships, persons and cargo from ports.

High-risk containers: A container which presents certain risk indicators upon analysis.

Lusaka Agreement: Africa's first regional intergovernmental wildlife law enforcement operational framework. Composed of seven member states, Kenya, Tanzania, Uganda, Lesotho, Liberia, Zambia, and Congo Brazzaville and three signatories, Ethiopia, Eswatini and South Africa, it was designed to respond to increased wildlife trafficking between Africa and Asia as well as other continents, to curtail the decimation of many species of plants and animals due to illegal trade.

Lusaka Agreement Task Force (LATF): an inter-governmental organization with the main function of facilitating cooperative activities in/among member states to the Lusaka Agreement, in carrying out investigations on violations of national laws pertaining to illegal trade in wild fauna and flora. See https://lusakaagreement.org.

Government Agencies: For the purposes of this publication, this includes port authorities/regulators, maritime administrations, customs/revenue officers, CITES Management Authorities and Scientific Authorities (fisheries, wildlife, forestry), national and financial intelligence services, veterinary services, coastguard services, criminal investigation services, attorney general/prosecution services and the judiciary.

Maritime Transport Operators/Shipping Supply Chain: For the purposes of this publication, this includes the private sector along the shipping supply line and transport nodes include shipowners, shipping lines, ship agents, port facility operators, terminal operators, freight forwarders, clearing and forwarding agents, cargo consolidators, container freight stations, empty depots, and so on. The term "company" and "maritime transport operator" may be used interchangeably.

Red flags: Indicators and warning signals, which may be explicit or implicit, suggesting that something is "not quite right" and may require further investigation.

Safe Framework of Standards: WCO's set of recommendations to customs organizations to help deter international terrorism, secure revenue collections and promote trade facilitation worldwide.

Shipment: The act of transporting cargo under the terms of a single bill of lading.

Shipper: A legal entity or person named on the bill of lading or equivalent multimodal transport document as the shipper, with whom a contract of carriage has been concluded with a shipping company.

Smuggling of wildlife: In this publication, "smuggling" means the illegal transportation or trafficking of wildlife in the form of export, re-export, trans-shipment and import in contravention of international law and national legislation of the country of origin. The term is synonymous with the "trafficking in wildlife", "wildlife trafficking" and "illegal wildlife trade".

Wildlife: In this publication, "wildlife" refers to all species of wild animals and plants, their parts and derivatives, whose international trade is regulated under CITES, as well as those protected under international law, and whose exports are restricted under national legislation.

Port Authority: a government entity that controls and manages activities at a port.

Port Control Unit (PCU): "joint units" gathering Customs officers and other national law enforcement personnel, such as the police, the drug enforcement agency, the environmental agency, and the air security agency. Part of the UNODC-WCO Container Control Programme, PCUs aim to improve risk analysis capacity and facilitate trade with minimum disruption.

Rip-Off: A "rip-off" is a concealment method whereby a legitimate shipment, usually containerized, is exploited to smuggle contraband. In "rip-off" cases, neither the shipper nor the consignee is aware that their shipment is being used to smuggle illicit cargo.

TEU: (twenty-foot equivalent unit) a measure of volume in units of 20-foot-long containers. One 20-foot container equals one TEU. Large container ships are able to transport more than 18,000 TEU.

Transshipment: Transshipment usually occurs when there is no direct trade route between the export and the import location. It is relatively cheaper to send your cargo through transshipment than directly sending it to the destination port. During transshipment, containers are unloaded at the site, reloaded onto a different vessel, and transported to the endpoint.

Annex A: PortMATE – Port/ Border Crossing Monitoring and Anti-Trafficking Evaluation Tool

Revised and enhanced version of the tool (the original PortMATE Version 2 was developed by WCS in 2016), produced after consultations with UNODC-WCO Container Control Program, recommendations of WCO SAFE Framework 2018, the Revised Arusha Declaration 2003, and after pilot assessment of ports and border posts in the Democratic Republic of Congo in 2020, and comments of Mr. P. Pandey, Additional Director General, Directorate General of Analytics and Risk Management, Central Board of Indirect Taxes and Customs (CBIC), Government of India.

UNDP-GEF Project

"Reducing Maritime Trafficking of Wildlife between Africa and Asia"

Overview of the Tool and Assessment Categories and Questions

PortMATE – Port/Border Crossing Monitoring and Anti-Trafficking Evaluation Tool has been designed as additional assessment tool fully complementary to the ICCWC Indicator Framework (IF) for Combating Wildlife and Forest Crime (ICCWC 2016) and focused mainly on ports, but can be applied for land border crossings and potentially for airports as well. The tool provides specific details to answer ICCWC IF Questions 12 *Are there law enforcement officers at ports of entry and exit that are aware of and trained in detecting and responding to wildlife crime? and 13 Do law enforcement officers at ports of entry and exit have equipment, tools and materials (e.g. sniffer dogs, identification manuals, and/or scanners) to detect and respond to wildlife crime?* The PortMATE has been developed as a complex framework for express assessment of an exit/entry point capacity to prevent, detect, and intercept of wildlife and other illicit trafficking. It provides a standardized assessment baseline for identification of key gaps at the port level, setting up priorities for interventions, and development of evidence-based recommendations to cover the gaps. Additionally the tool can be used as a progress monitoring tool for port-specific projects aimed to increase capacity of ports and other exit/entry points to intercept wildlife and other trafficking.

The PortMATE has 52 questions grouped in the following 9 categories:

- **Category 1:** Electronic Customs Declaration System (3 questions)
- **Category 2:** Intelligence (4 questions)
- **Category 3:** Risk Profiling System (6 questions)
- **Category 4:** Container/Cargo Scanning (3 questions)
- **Category 5:** Container/Cargo Inspection (5 questions)
- **Category 6:** Investigation and Prosecution (5 questions)
- **Category 7:** Inter-Agency and International Collaboration (4 questions)
- **Category 8:** Employee Integrity and Anti-Corruption (7 questions)
- **Category 9:** Supply Chain Security (14 questions)

Question explanations by category

Category 1: Electronic Customs Declaration System

1. Is there an electronic Customs clearance system in place and used by all port/border crossing clients?

   Electronic customs clearance replaces all written customs declarations and administrative files with electronic messages. This simplifies, automates and speeds up customs clearance and processing and at the same time makes it much more difficult for criminals to conceal illicit trafficking and hide fraud. The system allows Customs to track shipments in real time and detect anomalies and potential fraud. One of the examples of the system is the UNCTAD Automated System for Customs Data (ASYCUDA) used by many Customs administrations in the world.

2. Is there a Single Window environment for export/import clearance with participation of all relevant agencies, including wildlife agency?

   A Single Window system enables exporters and importers to submit regulatory documents at a single location and/or single entity. Such documents are typically customs declarations, applications for import/export permits, CITES permits, and other supporting documents such as certificates of origin, trading invoices, and full cargo manifests. Participation of several controlling agencies, including wildlife authority, in the system allows them to analyse the submitted documents for potential anomalies and fraud and at the same time speed up cargo clearance process.

3. **Is there an electronic CITES permit control system (like eCITES) in place integrated with Customs clearance system, and used by all port/border crossing clients?**

   An electronic CITEC permit system integrated in Customs clearance system allows to increase transparency of wildlife trade, avoid corruption in issuing of CITES permits, and detect potential fraud in the permits. An example of such a system is the eCITES developed by the UNCTAD that is integrated with ASYCUDA Customs clearance system.

Category 2: Intelligence

4. **Do Customs and/or another agency have an intelligence unit(s) at the port/border crossing to collect and analyse information on wildlife and other illicit trafficking?**

   Establishment and capacity building of Port Intelligence Units is among best practices for such enforcement agencies as Customs, Police, and Immigration Service. To effectively fight wildlife trafficking the units should be trained on Wildlife Crime Intelligence collection and analysis. UNODC has Criminal Intelligence Analysis Training-Wildlife course for port-based law enforcement officers.

5. **Is intelligence used to update wildlife crime risk indicators and target suspicious containers, trucks, passengers and baggage through inspections?**

   To be effective intelligence and information on previous seizures of illicit goods should be used at the port level not only for targeting inspection of suspicious consignments but ideally for update of risk indicators used for cargo risk profiling, including wildlife trafficking risks.

6. **Is intelligence passed to port/border crossing level agencies in an efficient and timely manner?**

   To be actionable the intelligence should be received by the port/border post in advance to allow for well prepared inspection and interception of illicit consignment.

7. **Is information relating to wildlife crime and other illicit trafficking collected from the port/border crossing community (clients)?**

   Port workers and port-connected private sector community (shipping lines, container terminal operators, freight forwarders, clearing agents, transporters, etc.) can provide valuable information on suspicious cargo and activities to law enforcement agencies to generate intelligence. However, they should know key signs of suspicious cargo and activities (so called "red flags") and how to report them to law enforcement safely and better anonymously.

Category 3: Risk Profiling System

8. **Is a system in place at the port/border crossing to conduct automated risk profiling of containers, trucks, and passengers for illicit trafficking, including wildlife?**

   Using automated targeting tools, Customs administrations identify shipments that are high-risk and are likely to contain illicit consignment (drugs, wildlife products, arms, etc.) as early as possible in the supply chain, at or before the port of departure (WCO SAFE Framework of Standards 2018). Automated risk profiling systems can profile thousands of containers in a matter of minutes using risk indicators. Some countries (e.g., USA) use risk profiling systems for international passenger vessels. Manual risk profiling is inefficient and cannot keep up with current huge volumes of container traffic through ports and border posts. Examples of automated risk profiling system include WCO Cargo Targeting System, Risk Profiler (Viet Nam), Automated Targeting System (US Customs and Border Protection), etc.

9. **Is there a set of regularly updated wildlife crime indicators used for automatic risk profiling at the port/border crossing?**

   Automated risk profiling system use many risk indicators to identify suspicious containers/cargo/passengers. Risk indicators are specified selectivity criteria such as: specific commodity code, country of origin, country whence consigned, licensing indicator, value, trader, level of compliance, type of means of transport, purpose of the stay in the Customs territory, financial consequences, or financial situation of the trader/person (WCO Risk Management Handbook 2004). Specific wildlife trafficking risk indicators help to detect containers/cargo that may contain illegal wildlife products. Examples of wildlife crime indicators:

   - Ports Implicated in Wildlife Trafficking (ports of origin (e.g., Matadi, Mombasa, Lagos) and destination (e.g., ports of China and Viet Nam);

- Commodity type (e.g., wood or plastic scrap often used for concealment of wildlife trafficking);
- Suspicious Companies/Clients that can be or has been complicit in wildlife trafficking;
- Inconsistencies in Full Cargo Manifest and Other Trade Documentations;
- Inconsistencies in CITES Permits;

10. **Is there arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators (including wildlife risk indicators) on a regular basis?**

To be effective risk indicators should be regularly updated based on seizures, intelligence, trade trends, and changes in export/import processes. It is the best practice when different agencies are involved in identification and update of the risk indicators through Risk Management Steering Committees that may include such authorities as Customs, Finance, Police, Wildlife, Forest, etc.

11. **Are officers at the port/border crossing trained on automatic risk profiling including wildlife trafficking?**

To deploy automated risk profiling systems effectively Customs officers need regular trainings/refreshers and updated risk indicators, including for wildlife trafficking.

12. **Are electronic full cargo manifests and other cargo documents on export, import, and trans-shipment provided to customs in advance (e.g., 24 hours before loading container on a ship, or 24 hours prior to arrival or prior to the departure from the last port of call, or 1-2 hours before its arrival to the land border post) for risk profiling purposes?**

Automated risk profiling system needs export, import, and trans-shipment data (e.g., full cargo manifests) provided in electronic format. To allow effective risk profiling and inspection the electronic cargo documents should be provided to Customs in advance (e.g., before containers are loaded on a ship).

13. **How many containers are risk profiled daily at the port/border crossing?**

Ideally 100% of container traffic (export, import, and trans-shipment) coming through a port should be risk profiled by Customs. However, it is not always possible due to lack of automated risk profiling systems, their low efficiency, lack of training, or lack of available electronic cargo documents form all exporters/importers.

Category 4: Container/Cargo Scanning

14. **Is non-intrusive inspection (NII) equipment (e.g., container scanners, passenger scanners, baggage scanners, etc.) available in sufficient quantity for inspecting cargo/baggage for wildlife contraband and other illicit goods?**

Non-intrusive inspection equipment (NII) refers to X-ray or gamma-ray imaging type equipment that allow inspection of cargo/baggage without the need to open it. This equipment is necessary to inspect high-risk cargo and/or transport conveyances quickly, without disrupting the flow of legitimate trade.

15. **Are officers trained to analyse scanned images and recognize patterns of illicit wildlife trafficking?**

The fraud detection rate using container scanned images depends on the skills and capability of the image analyst. Such analysts must remain completely up-to-date in order to obtain optimum results and should be trained to recognize different types of illicit trafficking including wildlife. Intensive training and practice are necessary for the image analysts to achieve maximum detection capability. UNODC and WCO can provide relevant training on container scanned image analysis.

16. **What containers are subject to mandatory scanning?**

Depending on availability of scanners and government requirements ports have different approaches for container scanning. Some scan only import containers, others – all import and export containers. The most effective way for scanning is to scan only suspicious containers detected by risk profiling.

Category 5: Container/Cargo/ Baggage Inspection

17. **Are officers at the port/border crossing provided with specific training related to detection and identification of illegal wildlife products, including concealment methods used by traffickers?**

Customs and other law enforcement agencies working at a port/border post should receive regular training/refreshers on the methods to detect and identify wildlife trafficking in containers/cargo/baggage and effective ways to search containers/cargo for illicit goods. UNODC and WCO have relevant training programs.

18. Are there K9 units in the port/border crossing with dogs trained to detect illicit wildlife products?

A K9 unit with dogs trained to detect wildlife products and other illicit goods in containers/cargo/baggage is one of the most effective means to combat wildlife trafficking through ports/border posts.

19. Is there a special secured location in the port/border crossing for container/cargo inspection?

Many ports/border posts have limited space that does not allow to have a special secure area for container inspection with restricted access to the site. However, a secure container inspection site can considerably limit confidential information leaks, improve investigations and allow organization of controlled deliveries.

20. Are Standard Operating Procedures developed and implemented for container/cargo/baggage inspection and seizure of wildlife and other illicit goods?

Physical container examination is performed by Customs if scanners detected some anomalies, or based on intelligence and risk profiling data, or as a random choice to confirm compliance. Standard Operating Procedures (SOPs) provides officers with exact algorithm on how to perform physical container inspection and seizure of illicit goods. SOPs make the process of physical inspection and seizure more effective and also serve as an anti-corruption mechanism. Senior officers must supervise and enforce implementation by SOPs by all officers.

21. Do the officers have regular training on CITES regulations and apply CITES knowledge and skills?

Port/border post Customs and other officers should receive regular and repetitive training on CITES identification and regulations to effectively identify and seize illicit wildlife products and detect fraudulent CITES permits.

Category 6: Investigation and prosecution

22. Is there a protocol for port/border crossing-level post-seizure investigation of cases, including wildlife trafficking?

Starting investigation right after seizure of wildlife and other illicit goods (so called port response investigations) at a port or border post is among best practices of law enforcement agencies. It improves ability of the law enforcement agencies to arrest and prosecute criminals involved in trafficking.

23. Do national law enforcement agencies have trained and empowered staff to support port/border crossing agencies to investigate wildlife seizure cases?

Often seizures of illicit wildlife products at ports and border posts are not followed up by special investigations. So, it is critically important for countries to have special and sufficient staff at Customs, Police, Wildlife Authority and/or other law enforcement agencies trained in investigation of wildlife seizures and wildlife crime cases.

24. Are port/border crossing-based law enforcement officers trained in forensic sampling and do they regularly collect forensic samples from wildlife seizures?

Wildlife forensics is concerned with providing scientific evidence to inform investigations into crimes against wildlife, focusing on determining the identity of poached or illegally traded wildlife products, and addressing questions relating to the species, geographic origin, relatedness, individual identity and age of samples (TRAFFIC). Wildlife crime forensic can provide enormous support for successful investigation and prosecution of wildlife crime cases. If port-based Customs and other officers trained in wildlife forensics sampling they can provide very valuable material for post-seizure investigations.

25. Are port/border crossing law enforcement agencies trained on controlled delivery operations in regard to wildlife trafficking?

Article 2(i) of the Organized Crime Convention describes controlled delivery as the technique for allowing suspicious shipments or cargo to leave, pass through or enter a jurisdiction with the knowledge and supervision of authorities.

Controlled deliveries are used to trace the flow of illicit goods such as drugs, wildlife specimen, counterfeit products or falsified medical products, in order to determine their true sources, transit routes and destination (UNODC).

26. Do port/border crossing enforcement agencies receive training in presenting evidence for prosecution on wildlife crime cases?

Effective documenting and presenting evidences of wildlife and other illicit trafficking to a court should be among the key skills of law enforcement agencies working at a port/border post.

Category 7: Inter-Agency and International Collaboration

27. Is an inter-agency Joint Port Control Unit or Joint Port Operating Center or Multi-Agency Unit established and functional at the port/border crossing?

Inter-agency units established at ports and border posts considerably increase port/post capacity to intercept wildlife and other illicit trafficking through joint risk profiling and container inspection. Usually the units consists from officers of Customs, Port Authority, Police, Wildlife Agency, Forest Agency, Drugs Commission. UNODC-WCO Container Control Program establishes and trains the inter-agency units at different ports, airports, and border posts of the world.

28. Does the port/border crossing has a system to securely exchange actionable information (including intelligence) on wildlife crime seizures and suspicious consignments with other ports/border posts in other countries?

Customs and inter-agency units at the ports/border posts should have a secure system to exchange information with other ports/border posts in other countries. For example, UNODC-WCO Container Control Program uses ContainerComm specially designed system for that. Exchange of intelligence and information on suspicious consignments between the ports/border posts helps to ensure that suspicious cargo that has not been inspected at the port of departure will be inspected and intercepted at the port of destination.

29. Are Customs Mutual Assistance Agreements or similar arrangements/MoUs in place and implemented for wildlife crime cases?

Customs Mutual Assistance Agreements allow for the exchange of information, intelligence, and documents that will ultimately assist countries in the prevention and investigation of customs offenses, including wildlife trafficking. Great demands are being placed on customs administrations around the world. With government resources not able to keep pace with this growing trade, customs administrations rely on mutual assistance as a powerful investigative tool (US Customs and Border Protection).

30. Do enforcement agencies working at the port/border crossing have a clear line of access to INTERPOL, WCO, UNODC, RILO and vice versa, and to what extent is this access used?

Direct access of ports/border posts to INTERPOL, WCO, UNODC, RILO can ensure that port/border post officers use up to date risk indicators and best practices, and receive real time warnings and intelligence concerning wildlife and other illicit trafficking from global network of interconnected law enforcement agencies.

Category 8: Employee Integrity and Anti-Corruption

31. Are training and awareness activities conducted to develop professional standards and deter corrupt practices with agencies working at port/border crossing level?

Customs and other agencies working at a port/border post should not only ensure that their employees are aware of anticorruption policies, procedures, and penalties for noncompliance but also that they have the necessary knowledge and skills to identify, report and counter corruption-related challenges. Regular communication and training activities play a key role in increasing awareness and obtaining commitment to anticorruption programs.

32. Is a secure and confidential mechanism to report corruption cases established at the port/border crossing with easy access for government employees and private sector?

A mechanism to report corruption practices should be easy to use, secure and confidential to be most effective. The reporting can be done on-line, via hot-line calls, or text messaging.

33. Do Customs and other law enforcement agencies at the port/border crossing conduct background check on perspective employees and regular check of current employees on corruption issues and connections with criminal networks?

Background check on perspective employees and regular check of current employees at sensitive positions are among best practices to prevent corruption and identify connections of employees to criminal networks.

34. Do Customs and other law enforcement agencies at the port/border crossing have a comprehensive Code of Conduct with penalties for non-compliance?

A Code or Standards of Conduct is a policy of a law enforcement agency to maintain a workforce that demonstrates high standards of ethical and professional conduct in order to ensure effective performance of government service. Penalties and disciplinary procedures must be included in the policy. The policy must be enforced for implementation by all officers.

35. Do Customs and other law enforcement agencies at the port/border crossing practice a preventive vigilance system to monitor employees' behaviour and conduct?

A preventive vigilance system represents a set of complex measures to improve procedures to reduce and eliminate corrupted practices at an agency. The system is incorporated in the routine management practices and helps to reduce opportunities for corruption, detect corrupted and unethical behaviour at early stages, and keep employees permanently at high level of professional conduct.

36. Do Customs and other law enforcement agencies at the port/border crossing have a robust recognition system for successful wildlife and other illicit trafficking seizures?

Robust and fare recognition and incentives system for successful seizures (e.g., performance related pay and awards) encourage law enforcement officers to achieve higher professional results and avoid corrupted practices. However, it should be mentioned that the system can fail in the situation of endemic corruption and wide-spread bribery.

37. Do Customs and other law enforcement agencies at the port/border crossing provided with sufficient salary, other remuneration and conditions to ensure the officers are able to maintain a decent standard of living?

Poorly paid civil servants are more vulnerable to corruption. Higher salaries make it more costly to engage in corruption due to the fear of losing a well-paid job (especially when income per capita is relatively low). However, increasing salaries is an effective anti-corruption tool only in the situation of effective control and monitoring of compliance and enforcement of appropriate sanctions for non-compliance.

Category 9: Supply Chain Security

38. Is there a Know Your Customer legal framework in the country for export/import agents that obligates the agents to conduct a mandatory due diligence process on their clients to prevent illicit trafficking?

Many wildlife seizure investigations stall because it is currently very hard to identify the source of seized consignments of illegal wildlife or forestry products, or to track precisely where they were heading or the chain of persons (individuals and companies) involved. This is partly because agents facilitating transactions and shipments hardly vet their customers or their consignments. They are not compelled to collect sufficient, accurate information, and what they do collect is rarely comprehensive enough for investigations, which may commence long after the transaction. Know Your Customer (KYC) framework for export/import agents helps to verify identity of each customer to make sure it is a real company/person, but not a shell company or fake entity used by traffickers to hide the origin and destination of illicit consignment. KYC helps law enforcement agencies to organize effective investigation and prosecution in case of seizure of illicit cargo.

39. Are there mechanisms in the country for mutually beneficial collaboration between law enforcement agencies and business stakeholders, like an Authorized Economic Operator or other programs to ensure security of supply chains?

Authorized Economic Operator (AEO), Customs-Trade Partnership Against Terrorism, and some other are voluntary and mutually beneficial supply chain security programs based on collaboration of exporters/importers with Customs to prevent and detect illicit trafficking in the international

trade chains. The programs extend supply chain security responsibility from Customs to exporters and importers but provide the traders with tangible benefits to speed up their customs clearance process and enhance business effectiveness.

40. Are wildlife and other agencies involved in development and recognition/validation process of AEOs in the country?

Multi-agency involvement in development of AEO national programs help to make them more robust and resilient to illicit trafficking, including wildlife.

41. Does the port/border crossings has sufficient and well trained Customs and other relevant agencies' staff to work with Authorized Economic Operators or other trusted operators to ensure they receive all benefits and provided with priority services?

One of the barriers on the way of development of voluntary supply chain security programs (e.g., AEO or C-TPAT) is low awareness of other agencies and sometimes Customs themselves about the program. That leads to that trusted operators are treated as all other exporters/importers and do not receive all the benefits and advantages despite development and implementation of their corporate supply chain security programs. So, they lose their interest to participate in the program.

42. Do exporters and importers use high-security mechanical container seal as prescribed in or exceeding ISO 17712?

High-security mechanical seal is one of the key tools to ensure integrity and security of sea containers.

43. Are export/import actors using the port/border crossing have special staff responsible for supply chain security, including wildlife trafficking issues?

This is one of the best practices for exporters/importers to have special officers responsible for supply chain security aspects and regular assessment of risk and vulnerabilities of different elements of supply chain to wildlife and other illicit trafficking. They evaluate different segments of supply chains based on the previous security breaches (where a contraband was introduced or likely be introduced into legal cargo), find security gaps, and cover the gaps through a complex of supply chain security measures.

44. Do export/import actors using the port/border crossing conduct risk assessments of their supply chain, including wildlife trafficking issues?

It is well known that wildlife crime and other illicit trafficking takes advantage of vulnerabilities in the legal supply chain, is enabled by corruption, fraud, and inadequate regulation, and frequently converges with other forms of serious criminality such as money laundering and counterfeiting. So, the first step of building a robust corporate supply chain security program is identify all the gaps, assess security risks, and develop a plan to address all identified vulnerabilities. It is recommended to conduct risk assessment and identify vulnerabilities of different elements of a supply chain at least annually and right after security breach incidents to effectively eliminate security gaps.

45. Do export/import actors using port/border crossing have special procedures in place to conduct due diligence check on their clients (beyond financial soundness issues to include indicators of whether the customer appears to be a legitimate business and/or possess a security risk, including illicit wildlife trafficking) and security of logistics service providers and other trade partners?

Exporters and importers deal with multiple clients and usually outsource a large portion of their supply chain activities to business partners. So, the companies need to be sure that that the clients do not represent a security risks and the business partners have appropriate security measures in place to secure the goods throughout the supply chain. The following are examples of some of the vetting elements that can help determine if a client company is legitimate:

- Verifying the company's business address and how long they have been at that address;
- Conducting research on the internet on both the company and its principals, including online media, social networks, and available public records;
- Checking business references; and
- Requesting a credit report and checking a client tax number.

46. **Do export/import actors using port/border crossing have special measures in place to ensure physical integrity, seal integrity, and security of containers and trucks, including inspection, storage, staffing and transportation?**

Wildlife and other smuggling often involve modification of containers or hiding of contraband inside them. There is a set of security measures recommended by AEO and C-TPAT to prevent, detect, and/or deter the altering of container structure or unauthorized entry into them, which could allow the introduction of contraband. The measures include the following: storing containers in secure area (inside and outside the port); 7 point container inspection; properly placing a seal on a container doors, and verifying that the seal has been affixed properly.

47. **Do export/import actors using the port/border crossing implement physical access control to prevent unauthorized entry to terminals, facilities, ships, and trucks; maintain control of employees and visitors, and protect company assets?**

Access controls prevent unauthorized access into facilities/areas/vessels, help maintain control of employees and visitors, and protect company assets. Access controls include identification of all employees, visitors, service providers, and vendors at all points of entry (C-TPAT 2020).

48. **Do export/import actors using port/border crossing implement personnel security measures to screen prospective employees and to periodically check current employees?**

Human resource force is one the most critical assets for a company, but it may also be one of its weakest security links. Many security breaches are caused by internal conspiracies, which is where one or more employees collude to circumvent security procedures aimed at allowing an infiltration of the supply chain. Therefore, exporters and importers should exercise due diligence to verify that employees filling sensitive positions are reliable and trustworthy. Sensitive positions include staff working directly with cargo or its documentation, as well as personnel involved in controlling access to sensitive areas or equipment (C-TPAT 2020).

49. **Do export/import actors using port/border crossing implement procedural security measures to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo, including audit of export/import documentation?**

Procedural Security encompasses many aspects of the import-export process, documentation, and cargo storage and handling requirements. Other vital procedural criteria are developed to reporting incidents and notification to law enforcement. The procedures should be written because it helps maintain a uniform process over time (C-TPAT 2020). Procedural security is based on a number of "red flags" – indicators of suspicious consignment in export/import documents and signs of compromised container/cargo integrity. All personnel handling documentation, whether paper or electronic, should be constantly asking themselves these questions: What is normal? What is not normal?

50. **Do export/import actors using port/border crossing implement physical security measures to protect their facilities/vessels?**

The physical security provides a number of deterrents/barriers/obstacles that help to prevent unauthorized access to cargo, sensitive equipment, and/or information. So, cargo handling and storage facilities, container storage areas, vessels, and facilities where import/export documentation is prepared should have physical barriers and deterrents that guard against unauthorized access (C-TPAT 2020). Elements of physical security include the following: fencing perimeter, safe gates, secure vehicle parking, secure building structure, locking devices, adequate lighting, alarm systems and video surveillance cameras.

51. **Do export/import actors using the port/border crossing conduct regular security training and awareness programs for staff on illicit trafficking issues, including wildlife crime?**

Implementing and maintaining a supply chain security needs the active participation and support of several departments and various personnel. One of the key aspects to maintaining a security program is training. Educating employees on what the threats are and how their role is important in protecting the company's supply chain is a significant aspect to the success and endurance of a supply chain security program. Moreover, when employees understand why security procedures are in place, they are much more likely to adhere to them (C-TPAT 2020). Training topics may include protecting access controls, recognizing internal conspiracies, container inspection (e.g., 7 point inspection, signs of hidden compartments and concealed contraband in naturally occurring compartments), export-import documentation

red flags, and reporting procedures for suspicious activities and security incidents. When possible, specialized training should include a hands-on demonstration.

52. **Do export/import actors using the port/border crossing have a clear and effective communication line with Customs or other law enforcement agencies to report suspicious consignments and activities?**

It is the best practice for exporter/importer to have written procedures for reporting an incident, which includes a description of the facility's internal escalation process. A notification protocol should be in place to report any suspicious activities or security incidents (such as wildlife or drug seizures, discovery of stowaways, etc.) that take place and which affects security of the supply chain. The incidents should be reported to designated security/management personnel, the closest port of entry/exit, Customs and any other pertinent law enforcement agencies, and business partners that may be part of the affected supply chain. Notifications to Customs must be made as soon as feasibly possible and in advance of any container leaving the port, or crossing the border (C-TPAT 2020). Examples of incidents warranting notification to Customs and other law enforcement agencies include (but are not limited to) the following (C-TPAT 2020):

- Discovery of tampering with a container or high-security seal;
- Discovery of a hidden compartment in a container;
- An unaccounted new seal has been applied to a container;
- Smuggling of contraband, including wildlife, drugs, people, stowaways, etc;
- Unauthorized entry into facilities, containers, locomotives, vessels, or aircraft carriers;
- Extortion, payments for protection, threats, and/or intimidation;
- Unauthorized use of a business entity identifier (if any).

PortMATE Assessment Template

Agency:	
Port/Land Border Crossing Name:	
Contact person:	
Contact details:	

Category 1: Electronic Customs Declaration System

1. Is there an electronic Customs clearance system in place and used by all port/border crossing clients?

0	1	2	3
There is no electronic customs clearance system used at the port/ border crossing	The electronic customs clearance system is in place, but used only by less than 50% of clients	The electronic customs clearance system is used by more than 50% of clients	The electronic customs clearance system is used by all clients without exclusions
Comments:			

2. Is there a Single Window environment for export/import clearance with participation of all relevant agencies, including wildlife agency?

0	1	2
There is no Single Window environment used at the port/ border crossing	The Single Window environment is in place, but only a few relevant agencies participate	The Single Window environment is in place, with participation of majority/all relevant agencies, including wildlife agency
Comments:		

3. Is there an electronic CITES permit control system (like eCITES) in place integrated with Customs clearance system, and used by all port/border crossing clients?

0	1	2	3
There is no electronic CITES permit control system used at the port/ border crossing	The electronic CITES permit control system is in place, but used only by less than 50% of clients	The electronic CITES permit control system is in place and used by more than 50% of clients	The electronic CITES permit control system is in place and used by all clients without exclusions
Comments:			

Category 2: Intelligence

4. Do customs and/or another agency have an intelligence unit(s) at the port/border crossing to collect and analyse information on wildlife and other illicit trafficking?

0	1	2	3
There is no intelligence unit at the port/border crossing to deal with wildlife crime and other illicit trafficking	There is an intelligence unit at the port/ border crossing, but understaffed and without appropriate training and lack of informants network	There is an intelligence unit at the port/border crossing with sufficient staff with basic training on wildlife crime intelligence and basic informants framework OR There is an intelligence unit at the port/border crossing with advanced level of training on wildlife crime intelligence, but understaffed and with and basic informants framework	There is an intelligence unit at the port/ border crossing with sufficient staff responsible for wildlife crime intelligence and advanced level of training and well developed informants network
Comments:			

5. Is intelligence used to update wildlife crime risk indicators and target suspicious containers, trucks, passengers and baggage through inspections?

0	1	2	3
Intelligence is not used to update wildlife crime risk indicators and target suspicious containers, trucks, passengers and baggage at the port/ border crossing	Intelligence is occasionally used to target suspicious containers, trucks, passengers and baggage at the port/ border crossing and is not used to update wildlife crime risk indicators	Intelligence is regularly used to target suspicious containers trucks, passengers and baggage at the port/ border crossing but is not used to update wildlife crime risk indicators	Intelligence is regularly used to target suspicious containers, trucks, passengers and baggage at the port/ border crossing and update wildlife crime risk indicators
Comments:			

6. Is intelligence passed to port/border crossing level agencies in an efficient and timely manner?

0	1	2
Wildlife crime intelligence is not passed to port/border crossing agencies	Wildlife crime intelligence is occasionally passed to port/ border crossing agencies and not in advance	Wildlife crime intelligence is regularly passed to port/border crossing agencies and well in advance to take actions
Comments:		

7. Is information relating to wildlife crime and other illicit trafficking collected from the port/border crossing community (clients)?

0	1	2
Information on wildlife and other crimes is not collected from the port /border crossing community	Information on wildlife and other crimes is occasionally collected from the port/border crossing community	There is a well-established practice at the port to regularly collect information on wildlife and other crimes from port/border crossing community
Comments:		

Category 3: Risk Profiling System

8. Is a system in place at the port/border crossing to conduct automated risk profiling of containers, trucks and passengers for illicit trafficking, including wildlife?

0	1	2
No system for automatic risk profiling on illicit trafficking is in place	The system for automatic risk profiling on illicit trafficking is in place, but it is not used for wildlife crime profiling	The system for automatic risk profiling on illicit trafficking is in place and used for wildlife crime profiling
Comments:		

9. Is there a set of regularly updated wildlife crime indicators used for automatic risk profiling at the port/ border crossing?

0	1	2	3
No wildlife crime indicators are used for risk profiling	A few wildlife crime indicators are used for risk profiling, but they are not regularly updated	A full set of wildlife crime indicators is used for risk profiling but it is not regularly updated based on intelligence and seizures	A full set of wildlife crime indicators is used for risk profiling and it is regularly updated based on intelligence and seizures
Comments:			

10. Is there arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators (including wildlife risk indicators) on a regular basis?

0	1	2	3
There is no arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators	There is an arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators, however many relevant agencies including wildlife agency do not participate in the process	There is an arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators with participation of all relevant agencies, including wildlife agency, but it is not regular	There is an arrangement between Customs and other relevant agencies concerning the determination, review and update of risk indicators with participation of all relevant agencies, including wildlife agency, on a regular basis
Comments:			

11. Are officers at the port/border crossing trained on automatic risk profiling including wildlife trafficking?

0	1	2	3
No Customs officers are trained to perform automatic risk profiling at the port/border crossing	A few Customs officers have basic level of training on automatic risk profiling at the port/border crossing and are not trained in profiling of wildlife trafficking	There are sufficient number of Customs officers with basic level of training on automatic risk profiling at the port/border crossing, including profiling of wildlife trafficking	There is a specially designated Risk Profiling Unit at the port/border crossing with advanced level of training on automatic risk profiling, including wildlife trafficking
Comments:			

12. Are electronic full cargo manifests and other cargo documents on export, import, and trans-shipment provided to customs in advance (e.g., 24 hours before loading container on a ship, or 24 hours prior to arrival or prior to the departure from the last port of call, or 1-2 hours before its arrival to the land border post) for risk profiling purposes?

0	1	2	3
No electronic full cargo manifests on export, import, and trans-shipment provided to customs	Only a few companies provide electronic full cargo manifests on import and trans-shipment in advance, but export manifest are provided only after containers are loaded on a ship or enter the border crossing	Majority of companies provide electronic full cargo manifests on import and trans-shipment in advance, but export manifest are provided only after containers are loaded on a ship or enter the border crossing	All companies provide electronic full cargo manifests on import, export, and trans-shipment in advance
Comments:			

13. How many containers are risk profiled daily at the port/border crossing?

0	1	2	3
No containers are risk profiled at the port/ border crossing	Less than 5% of container traffic, mainly import, are profiled daily at the port/ border crossing	Less than 50% of container traffic, mainly import, are profiled daily at the port/border crossing	50-100% of container traffic, both export and import are profiled daily at the port/border crossing
Comments:			

Category 4: Container/Cargo/Passenger Scanning

14. Is non-intrusive inspection (NII) equipment (e.g., modern container scanners, passenger and baggage scanners) available in sufficient quantity for inspecting cargo for wildlife contraband and other illicit goods?

0	1	2	3
No scanners are available at the port/ border crossing	Only old scanners are available at the port/ border crossing and in insufficient quantity	Modern scanners are available in the port/ border crossing, but in insufficient quantity	Sufficient number of modern scanners are available at the port/ border crossing
Comments:			

15. Are officers trained to analyse scanned images and recognize patterns of illicit wildlife trafficking?

0	1	2	3
No officers are trained to analyse scanned images and recognize patterns of illicit wildlife trafficking	Only a few officers have basic training to analyse scanned images, but no skills to recognize patterns of illicit wildlife trafficking	Sufficient number of officers have basic training to analyse scanned images, but no skills to recognize patterns of illicit wildlife trafficking	Sufficient number of officers have advanced training to analyse scanned images and recognize patterns of illicit wildlife trafficking
Comments:			

16. What containers are subject to mandatory scanning?

0	1	2	3
None of containers is subject to mandatory scanning	Only import containers are subjects for mandatory scanning	All import and export containers are subjects to mandatory scanning	Only selected based on the risk profiling import and export containers are subjects for mandatory scanning
Comments:			

Category 5: Container/Cargo/Baggage Inspection

17. Are officers at the port/border crossing provided with specific training related to detection and identification of illegal wildlife products, including concealment methods used by traffickers?

0	1	2	3
No officers are trained on detection and identification of illegal wildlife products, including concealment methods used by traffickers	Officers have only basic level of training on detection and identification of illegal wildlife products, including concealment methods used by traffickers	Some officers have advanced level of training on detection and identification of illegal wildlife products, including concealment methods used by traffickers, but majority have only basic level	All relevant officers have advanced level of training on wildlife trafficking and receive refreshers at least annually.
Comments:			

18. Are there K9 units in the port/border crossing with dogs trained to detect illicit wildlife products?

0	1	2	3
No K9 Unit exist at the port/border crossing	K9 Unit is present, but have no dogs and handlers trained to detect illicit wildlife products	K9 Unit is present, but have insufficient number of dogs and handlers to detect illicit wildlife products	K9 Unit is present and have sufficient number of dogs and handlers to detect illicit wildlife products
Comments:			

19. Is there a special secured location in the port/border crossing for container/cargo inspection?

0	1	2
No special location exists at the port/border crossing for container inspection	Special location exists at the port/border crossing for container inspection exist at the port, but it is unsecure	Special secure location exists at the port/border crossing for container inspection
Comments:		

20. Are Standard Operating Procedures developed and implemented for container/cargo/baggage inspection and seizure of wildlife and other illicit goods?

0	1	2	3
No SOPs developed at the port/border crossing for container/cargo inspection and seizure of illicit goods	SOPs are developed, but not actually followed by the officers	SOPs are developed, but only partially followed by the officers	SOPs are developed and fully followed by all relevant officers
Comments:			

21. Do the officers have regular training on CITES regulations and apply CITES knowledge and skills?

0	1	2	3
No officers are trained on CITES regulations	Officers have only basic level of training on CITES regulations and do not apply CITES knowledge and skills	Only some officers have advanced level of training on CITES regulations and apply CITES knowledge and skills	All relevant officers have advanced level of training on CITES regulations, receive refreshers at least annually, and apply CITES knowledge and skills
Comments:			

Category 6: Investigation and prosecution

22. Is there a protocol for port/border crossing-level post-seizure investigation of cases, including wildlife trafficking?

0	1	2
There is no protocol for port/ border crossing -level post-seizure investigation of cases	There is a protocol for port/ border crossing -level post-seizure investigation of cases, but it is not actually implemented or implemented partially	There is a protocol for port/ border crossing -level post-seizure investigation of cases and it is fully implemented
Comments:		

23. Do national law enforcement agencies have trained and empowered staff to support port/border crossing agencies to investigate wildlife seizure cases?

0	1	2
National law enforcement agencies do not have trained and empowered staff to support port/border crossing agencies to investigate wildlife crime cases	National law enforcement agencies have trained and empowered staff to support port/border crossing agencies to investigate wildlife crime cases, but their number is insufficient	National law enforcement agencies have sufficient, trained and empowered staff to support port/border crossing agencies to investigate wildlife crime cases
Comments:		

24. Are port/border crossing based law enforcement officers trained in forensic sampling and do they regularly collect forensic samples from wildlife seizures?

0	1	2	3
No port/border crossing based law enforcement officers are trained in forensic sampling	A few port/border crossing based law enforcement officers are trained in forensic sampling, but do not collect forensic samples from wildlife seizures	Sufficient number of port/ border crossing based law enforcement officers are trained in forensic sampling and sometimes collect forensic samples from wildlife seizures	Sufficient number of port/border crossing based law enforcement officers are trained in forensic sampling and collect forensic samples from all wildlife seizures
Comments:			

25. Are port/border crossing law enforcement agencies trained on controlled delivery operations in regard to wildlife trafficking?

0	1	2
No port/border crossing based law enforcement officers are trained on controlled delivery operations in regard to wildlife trafficking	Port/border crossing based law enforcement officers are trained on controlled delivery operations, but do not perform controlled deliveries in regard to wildlife trafficking	Port/border crossing based law enforcement officers are trained on controlled delivery operations and perform controlled deliveries in regard to wildlife trafficking
Comments:		

26. Do port/border crossing enforcement agencies receive training in presenting evidence for prosecution on wildlife crime cases?

0	1	2
No port/border crossing based law enforcement officers are trained in presenting evidence for prosecution	Only a few law enforcement officers are trained in presenting evidence for prosecution, but more trainings are needed	All relevant port/border crossing based law enforcement officers are regularly trained in presenting evidence for prosecution
Comments:		

Category 7: Inter-Agency and International Collaboration

27. Is an inter-agency Joint Port Control Unit or Joint Port Operating Center or Multi-Agency Unit established and functional at the port/border crossing?

0	1	2
No JPCU or JOC or Multi-Agency Unit exist at the port/border crossing	JPCU or JOC or Multi-Agency Unit is established but understaffed and/or non-functional	JPCU or JOC or Multi-Agency Unit is established, have all necessary staff and functional
Comments:		

28. Does the port/border crossing has a system to securely exchange actionable information (including intelligence) on wildlife crime seizures and suspicious consignments with other ports/border posts in other countries?

0	1	2	3
No system to securely exchange actionable information on wildlife crime cases with other ports/countries is established	System to securely exchange actionable information on wildlife crime cases with other ports/countries on daily basis is established, but not used	System to securely exchange actionable information on wildlife crime cases with other ports/countries on daily basis is established, but used only occasionally	System to securely exchange actionable information on wildlife crime cases with other ports/countries on daily basis is established and regularly used
Comments:			

29. Are Customs Mutual Assistance Agreements or similar arrangements/MoUs in place and implemented for wildlife crime cases?

0	1	2
No Customs Mutual Assistance Agreements are in place and implemented for wildlife crime cases	Some Customs Mutual Assistance Agreements are in place, but not implemented for wildlife crime cases, more agreements are needed	All necessary Customs Mutual Assistance Agreements are in place and implemented for wildlife crime cases
Comments:		

30. Do enforcement agencies working at the port/border crossing have a clear line of access to INTERPOL, WCO, UNODC, RILO and vice versa, and to what extent is this access used?

0	1	2	3
Enforcement agencies working at the port/ border crossing do not have a line of access to INTERPOL, WCO, UNODC, RILO	Enforcement agencies working at the port/ border crossing do have a line of access to INTERPOL, WCO, UNODC, RILO, but do not use it	Enforcement agencies working at the port/ border crossing do have a line of access to INTERPOL, WCO, UNODC, RILO, but use occasionally	Enforcement agencies working at the port/ border crossing do have a well established line of access to INTERPOL, WCO, UNODC, RILO that is used on regular basis
Comments:			

Category 8: Employee Integrity and Anti-Corruption

31. Are training and awareness activities conducted to develop professional standards and deter corrupt practices with agencies working at port/border crossing level?

0	1	2
No training and awareness activities conducted to develop professional standards and deter corrupt practices with agencies working at port/border crossing level	Training and awareness activities occasionally conducted to develop professional standards and deter corrupt practices with agencies working at port/border crossing level	Regular training and awareness activities (at least annually) conducted to develop professional standards and deter corrupt practices with agencies working at port/border crossing level
Comments:		

32. Is a secure and confidential mechanism to report corruption cases established at the port/border crossing with easy access for government employees and private sector?

0	1	2	3
There is no mechanism to report corruption cases	There is a mechanism to report corruption cases at the port/border crossing, but it is not secure/confidential and not used by government employees and private sector	There is a secure/ confidential mechanism to report corruption cases at the port/ border crossing, but it is rarely used and not supported by follow up investigations	There is a secure/ confidential mechanism to report corruption cases at the port/border crossing, that is regularly used and accompanied with follow up investigations
Comments:			

33. Do Customs and other law enforcement agencies at the port/border crossing conduct background check on perspective employees and regular check of current employees on corruption issues and connections with criminal networks?

0	1	2	3
Customs and other agencies do not conduct background check on perspective employees and regular check of current employees	Customs and other agencies conduct background check on some perspective employees, but do not conduct regular check of current employees	Customs and other agencies conduct background check on all perspective employees, but conduct only irregular check of current employees	Customs and other agencies conduct background check on all perspective employees and regular check on current employees
Comments:			

34. Do Customs and other law enforcement agencies at the port/border crossing have a comprehensive Code of Conduct with penalties for non-compliance?

0	1	2
There is no Code of Conduct for Customs and other law enforcement agencies at the port/border crossing	There is a Code of Conduct for Customs and other law enforcement agencies at the port/border crossing, but it is not enforced	There is a Code of Conduct for Customs and other law enforcement agencies at the port/border crossing, and it is enforced, including real and implemented penalties for non-compliance
Comments:		

35. Do Customs and other law enforcement agencies at the port/border crossing practice a preventive vigilance system to monitor employees' behaviour and conduct?

0	1	2
There is no preventive vigilance system practiced by Customs and other agencies at the port/ border crossing	There is a preventive vigilance system practiced by Customs and other agencies at the port/border crossing, but it is not implemented	There is a preventive vigilance system practiced by Customs and other agencies at the port/border crossing, and it is implemented
Comments:		

36. Do Customs and other law enforcement agencies at the port/border crossing have a robust recognition system for successful wildlife and other illicit trafficking seizures?

0	1	2	3
Customs and other agencies do not have a recognition system for successful wildlife and other illicit trafficking seizures	There is a recognition system developed, but not implemented	There is a recognition system, but is used irregularly, not all successful seizures are awarded	There is a recognition system, and it awards and recognize all successful seizures
Comments:			

37. Do Customs and other law enforcement agencies at the port/border crossing provided with sufficient salary, other remuneration and conditions to ensure the officers are able to maintain a decent standard of living?

0	1	2
Customs and other officers at the port/border crossing are not provided with sufficient salary, other remuneration and are not able to maintain a decent standard of living	Customs and other officers at the port/border crossing are not provided with sufficient salary, but receive other remuneration and are able to maintain a decent standard of living	Customs and other officers at the port/border crossing are provided with sufficient salary, receive other remuneration, and are able to maintain a decent standard of living
Comments:		

Category 9: Supply Chain Security

38. Is there a Know Your Customer legal framework in the country for export/import agents that obligates the agents to conduct a mandatory due diligence process on their clients to prevent illicit trafficking?

0	1	2	3
There is no Know Your Customer legal framework for export/import agents	There is a Know Your Customer legal framework for export/import agents developed, but not yet operationalized	There is an operationalized Know Your Customer legal framework for export/import agents developed, but it is not sufficiently enforced	There is an operationalized and enforced Know Your Customer legal framework for export/import agents
Comments:			

39. Are there mechanisms in the country for mutually beneficial collaboration between law enforcement agencies and business stakeholders, like an Authorized Economic Operator or other programs to ensure security of supply chains?

0	1	2	3
There is no Authorized Economic Operator or other programs to ensure security of supply chain	There is Authorized Economic Operator or another program to ensure security of supply chain, however, it is not operational	There is Authorized Economic Operator or another program to ensure security of supply chain, however, it is used only by a few companies (mainly importers)	There is Authorized Economic Operator or another program to ensure security of supply chain, and it is used by majority of the key importers and exporters
Comments:			

40. Are wildlife and other agencies involved in development and recognition/validation process of AEOs in the country?

0	1	2
There are no wildlife and other agencies involved in AEO recognition/validation process in the country	There are other agencies involved in AEO recognition/validation process in the country, but not a wildlife agency	There are other agencies involved in AEO recognition/validation process in the country including wildlife agency
Comments:		

41. Does the port/border crossings has sufficient and well trained Customs and other relevant agencies' staff to work with Authorized Economic Operators or other trusted operators to ensure they receive all benefits and provided with priority services?

0	1	2
There are no Customs officers and other relevant agencies' staff at the ports/border crossings responsible for AEO or another trusted operator program	There are Customs officers and other relevant agencies' staff at the ports/border crossings responsible for AEO or another trusted operator program, but their number and level of training is insufficient	There is sufficient number of well-trained Customs officers and other relevant agencies' staff at the ports/border crossings responsible for AEO or another trusted operator program
Comments:		

42. Do exporters and importers use high-security mechanical container seal as prescribed in or exceeding ISO 17712?

0	1	2	3
Exporters and importers do not use high-security mechanical container seal as prescribed in ISO 17712	Only a few exporters and importers use high-security mechanical container seal as prescribed in ISO 17712	Majority of exporters and importers use high-security mechanical container seal as prescribed in ISO 17712	All exporters and importers use high-security mechanical container seal as prescribed in or exceeding ISO 17712
Comments:			

43. Are export/import actors using the port/border crossing have special staff responsible for supply chain security, including wildlife trafficking issues?

0	1	2
No companies using the port/border crossing have special staff responsible for supply chain security, including wildlife trafficking issues	Only a few companies using the port/border crossing have special staff responsible for supply chain security, including wildlife trafficking issues	Majority of the companies at the port/border crossing have special staff responsible for supply chain security, including wildlife trafficking issues
Comments:		

44. Do export/import actors using the port/border crossing conduct risk assessments of their supply chain, including wildlife trafficking issues?

0	1	2
No companies using the port/ border crossing conduct risk assessments of their supply chain	Only a few companies using the port/border crossing conduct risk assessments of their supply chain, including wildlife trafficking issues	Majority of the companies using the port/border crossing conduct risk assessments of their supply chain, including wildlife trafficking issues
Comments:		

45. Do export/import actors using port/border crossing have special procedures in place to conduct due diligence check on their clients (beyond financial soundness issues to include indicators of whether the customer appears to be a legitimate business and/or possess a security risk, including illicit wildlife trafficking) and security of logistics service providers and other trade partners?

0	1	2
No companies using the port/ border crossing have special procedures in place to conduct due diligence check on their clients and security of logistics service providers	Only a few companies using the port/border crossing have special procedures in place to conduct due diligence check on their clients and security of logistics service providers	Majority of the companies using the port/border crossing have special procedures in place to conduct due diligence check on their clients and security of logistics service providers
Comments:		

46. Do export/import actors using port/border crossing have special measures in place to ensure physical integrity, seal integrity, and security of containers and trucks, including inspection, storage, staffing and transportation?

0	1	2
No companies using the port/ border crossing have special measures in place to ensure physical integrity and security of containers and trucks, including inspection, storage, staffing and transportation	Only a few companies using the port/border crossing have special measures in place to ensure physical integrity and security of containers and trucks, including inspection, storage, staffing and transportation	Majority of the companies using the port/border crossing have special measures in place to ensure physical integrity and security of containers and trucks, including inspection, storage, staffing and transportation
Comments:		

47. Do export/import actors using the port/border crossing implement physical access control to prevent unauthorized entry to terminals, facilities, ships, and trucks; maintain control of employees and visitors, and protect company assets?

0	1	2
No companies using the port/ border crossing implement physical access control to prevent unauthorized entry to terminals, facilities, ships, and trucks; maintain control of employees and visitors, and protect company assets	Only a few companies using the port/border crossing implement physical access control to prevent unauthorized entry to terminals, facilities, ships, and trucks; maintain control of employees and visitors, and protect company assets	Majority of the companies using the port/border crossing implement physical access control to prevent unauthorized entry to terminals, facilities, ships, and trucks; maintain control of employees and visitors, and protect company assets
Comments:		

48. Do export/import actors using port/border crossing implement personnel security measures to screen prospective employees and to periodically check current employees?

0	1	2
No companies using the port/ border crossing implement personnel security measures to screen prospective employees and to periodically check current employees	Only a few companies using the port/border crossing implement personnel security measures to screen prospective employees and to periodically check current employees	Majority of the companies using the port/border crossing implement personnel security measures to screen prospective employees and to periodically check current employees
Comments:		

49. Do export/import actors using port/border crossing implement procedural security measures to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo, including audit of export/import documentation?

0	1	2
No companies using the port/ border crossing implement procedural security measures to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo	Only a few companies using the port/border crossing implement procedural security measures to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo	Majority of the companies using the port/border crossing implement procedural security measures to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo
Comments:		

50. Do export/import actors using port/border crossing implement physical security measures to protect their facilities/vessels?

0	1	2
No companies using the port/border crossing implement physical security measures to protect their facilities/vessels	Only a few companies using the port/border crossing implement physical security measures to protect their facilities/vessels	Majority of the companies using the port/border crossing implement physical security measures to protect their facilities/vessels
Comments:		

51. Do export/import actors using the port/border crossing conduct regular security training and awareness programs for staff on illicit trafficking issues, including wildlife crime?

0	1	2
No companies using the port/border crossing conduct regular security training and awareness programs for staff on wildlife crime and other illicit trafficking issues	Only a few companies using the port/border crossing conduct regular security training and awareness programs for staff on wildlife crime and other illicit trafficking issues	Majority of the companies using the port/border crossing conduct regular security training and awareness programs for staff on wildlife crime and other illicit trafficking issues
Comments:		

52. Do export/import actors using the port/border crossing have a clear and effective communication line with Customs or other law enforcement agencies to report suspicious consignments and activities?

0	1	2
No companies using the port/border crossing have a clear and effective communication line with Customs or other law enforcement agencies to report suspicious consignments and activities	Only a few companies using the port/border crossing have a clear and effective communication line with Customs or other law enforcement agencies to report suspicious consignments and activities	Majority of the companies using the port/border crossing have a clear and effective communication line with Customs or other law enforcement agencies to report suspicious consignments and activities
Comments:		

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