



National Wildlife Crime Unit

The UK Illegal Wildlife Trade Project Final Term

Risk Assessment





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Executive summary

The illegal wildlife trade (IWT) is a serious financial transnational crime, that generates around £17 billion pounds per year in illicit finances. Despite this the illegal wildlife trade continues to be assessed as a lower priority for law enforcement and government agencies. **High Confidence.**

Over the course of the three-year IWT project, there has been a more focused approach to examining the illegal wildlife trade picture as it currently affects the UK, allowing for a more fluid response to emerging threats and identifying the correct priorities of the NWCU. **High Confidence.**

Whilst the UK continues to be primarily a demand country for the illegal wildlife trade, the UK does have its own native species that are being illegally trafficked. **High Confidence.**

The level of support provided to IWT investigations because of the three-year funding project has seen phenomenal successes, rising from 35 to 259 investigations per year over a four-year period. This highlights that non-permanent and or limiting funding streams would impact negatively on the capability and capacity of NWCU to effectively tackle the illegal wildlife trade. **High Confidence.**

UK Border Force consistently deliver a healthy level of seizures, which has raised a challenge around housing live exotic species that need to be quarantined. UKBF CITES team largely rely upon private entities involved in the exotic trade, such as zoos and collectors to provide long term care and control of the live species. **High Confidence.**

Although there are parallels between the picture at the border with the inland picture, there are also

significant differences being seen. The illegal trade of plants is a common species being seen at the border, whereas intelligence inland is extremely sparse. **High Confidence.**

Reptilian fashion goods continue to be identified and are managed as a prominent issue at the border, as opposed to there being a wider inland problem. **High Confidence.**

The illegal trade of European eel, parrots and birds of prey, specifically peregrine falcons have been identified inland. **High Confidence.**

However, it is anticipated that the illegal trade in European eel may see a decrease in risk, during the next assessment. **Moderate Confidence.**

The illegal trade cannot be tackled in silos, a multi-agency approach is required. Strengthening of these partnerships can be seen throughout the three-year project, with successful two-way intelligence streams being embedded between law enforcement and government agencies. **High Confidence.**

Following the head of the NWCU being appointed chair of the INTERPOL Wildlife Crime Working this has opened avenues for collaborative working with INTERPOL and readmittance to attending the European Wildlife Enforcement Network as observers. **High Confidence.**

The cross-cutting theme of cyber-crime sees offenders not only utilise online marketplaces to commit the online illegal trade but use social media sites to communicate and live stream offending. **High Confidence.**

Globally wildlife crime is often convergent with serious crimes such as human trafficking, drugs and violence. **High Confidence.**

The development of mapped and unmapped networks has indicated poly criminality, with some transnational networks potentially engaging in other serious crimes such as money laundering and corruption. **Moderate Confidence.**

Initial findings from parallel financial investigations suggest money layering to conceal proceeds of crime. **Moderate Confidence.**

Zoonotic diseases have been identified through OCG development, with many of the birds illegally entering the UK having psittacine beak & feather disease. As these birds are not subjected to health examinations this poses a serious health risk to the UK, which is not restricted to illegally traded birds but relates to any trafficked CITES listed species, which could potentially lead to a health pandemic. **High Confidence.**



Recommendations

- To secure a permanent index linked IWT funding stream for the National Wildlife Crime Unit, so that they can continue to provide an effective and invaluable service as well as allowing for growth.
- To mirror the international picture and align wildlife crime with environmental as opposed to rural crime.
- Home Office to consider including the illegal wildlife trade within the serious and organised crime strategy so that such offences and intelligence can be captured, investigated and managed more effectively by Police Forces and partners.
- To create sentencing guidelines for the illegal wildlife trade.
- NWCU and law enforcement to continue to obtain witness statements from JNCC and veterinary clinics to assist with highlighting the ecological and welfare impacts of IWT.
- For the chair of the INTERPOL Wildlife Crime Working Group to consider holding more frequent partnership events to strengthen greater collaboration between law enforcement, government and the private sector.
- Law enforcement, Government organisations and financial sectors to ensure that their training is cascaded down to the appropriate staff members, who can help identify illicit funds linked to IWT.
- Digital training to be provided to the NWCU to assist with understanding the risks and priorities outlined within the INTERPOL threat assessment.
- To provide training to the CPS around IWT and reiterate the importance of ensuring that a delegate attends each Priority Delivery Group.
- CPS to consider appointing a national lead for wildlife crime prosecutions, including IWT, to provide overarching support and expertise.
- For each investigation to have a financial investigation strategy set out by the Investigating Officer.
- NWCU to reflect upon the IWT financial tool kit when considering and conducting parallel financial investigations.
- NWCU and local Police forces to continue to identify and map IWT OCGs operating within the UK.
- NWCU to continue strengthening relationships and multi-agency working with other countries, to ensure that a two-way intelligence stream is opened, once international links are identified.

Introduction

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

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

The convention is implemented through Control of Trade in Endangered Species Regulations 2018 (COTES). The police have primary responsibility

for enforcing the provisions of COTES. UK Border Force has primary responsibility for enforcing offences relating to imports and exports of wildlife at the border contrary to the provisions of the Customs and Excise Management Act (CEMA) 1979. COTES and CEMA offences are Home Office notifiable.

In addition, other domestic legislation such as the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017, play their part when offences relate to impact on UK species.

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

At the G7 Leaders' Summit in Cornwall, countries came together and agreed a shared G7 Nature Compact¹. This is a key agreement which brings G7 countries together to address the most pressing international and interlinked challenges of biodiversity loss, species extinction and climate change which are intertwined with IWT. Leaders have also agreed to review progress against the Nature Compact to ensure delivery of its 2030 vision.

1 | https://assets.publishing.service.gov.uk/media/60ec1b2fe90e0764c6eb38d8/G7_2030_Nature_Compact__PDF__120KB__4_pages_.pdf

In light of this the Home Office provided funding in 2022 to support a three-year project and commissioned the National Wildlife Crime Unit (NWCU) to produce the first ever illegal wildlife trade risk assessment. This has been an opportunity to provide a single point of truth around the illegal wildlife trade. This in essence primarily examines two main points: the illegal trade of UK native species being illegally traded within and out of the UK and for non-UK species being illegally traded into the UK.

Aims & Objectives

- To examine the risks surrounding the illegal wildlife trade within the UK.
- To examine the international links to the UK and the most prominent risks.
- To outline the most common species of Flora & Fauna that are most at risk of IWT.
- To provide strategic recommendations for the wildlife crime enforcement family and respective partners.
- To determine realistic key deliverables for the NWCU.

Methodology

The following products, systems and organisations have fed into the production of this document:

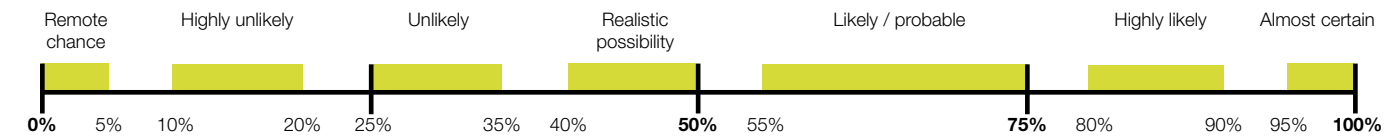
- Police systems; Police National Database (PND) & Police National Computer (PNC).
- NWCU Wildlife Intelligence Database (WID).
- NWCU Convictions Database.
- Open-source research.
- UNODC - ICCWC Toolkit (United Nations Office on Drugs and Crime – International Consortium on Combating Wildlife Crime).
- RUSI (Royal United Services Institute) - report on illegal wildlife trade and illicit finance in the UK – January 2022.

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

Probability & confidence

Throughout the assessment the ‘probability yardstick’ utilised by other agencies will be used to ensure consistency when assessing probability across different priority areas.

The following defines the probability ranges when such language is used, and the table details the confidence level of statements.



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

Caveats

Data searches on police systems are based on keyword searches and are therefore not wholly accurate.

Treasury, IFAW, JNCC, Kew, Ornamental Aquatic Trade Association, TRAFFIC and the NWCU led Cybercrime Network.







Acknowledgements

The author would like to thank all interviewees including APHA CITES team, UK Border Force, Defra, the Environment Agency, His Majesty’s

Additional thanks to fellow members of the NWCU for helpful feedback around draft versions of the document.



Success & improvement within the NWCUC due to IWT Funding

<div>Investigation ARM</div> 	<div>No of IWT investigations per year which the NWCUC have supported:</div> <div> <div>2021 - 35</div> <div>2022 - 99</div> <div>2023 - 197</div> <div>2024 - 259</div> </div>
<div>Intelligence ARM</div> 	<ul style="list-style-type: none"> IWT Risk Assessment Bespoke problem & subject profiles on priority areas Results analysis of operations Specialist skillsets for the NWCUC, including telecoms analysis and ANPR analysis. Five evidential analytical products produced for court or to assist with arrest interview. Risk analysis
<div>Financial intelligence & investigations</div> 	<ul style="list-style-type: none"> 3 x members of NWCUC trained during 2024 Financial intelligence support for 10 investigations including 2 OCGS in 2024 Provided guidance and support to UKFIU, NCA Featured on UKFIU podcasts relating to IWT
<div>Open-source intelligence & investigations</div> 	<ul style="list-style-type: none"> New software and hardware systems obtained to conduct open-source research OSINT intelligence is embedded into intelligence and investigative work 1 x intelligence officer received specialised OSINT training from Europol Engagement within live Europol led OP EMPACT cyber operation - which fed into the UK online illegal trade picture
<div>Organised crime groups & nominals of interest</div> 	<ul style="list-style-type: none"> Access to APMIS Identifying & mapping organised crime groups AND Nominals of Interest (NOIS). Conducting MoRiLE assessments to feed into the National SOC Picture Recording of disruptions and moderation Ensuring PND records is accurate and up to date
<div>Leading & supporting operations</div> 	<ul style="list-style-type: none"> Led on 12 international IWT Operations Supported 7 international IWT Operations

Challenges with tackling IWT²

<div>Funding</div> 	<p>The most prominent challenge and risk to tackling IWT, overarches all other barriers noted by organisations. Low level and non-permanent funding streams result in challenges with embedding long-term solutions to tackling the illegal wildlife trade. This not only impacts on law enforcement, but Government and Non-Government organisations. Temporary employment contracts generated to support short term projects result in units losing valuable skillsets, experience and unique specialisms, which are extremely hard to replace when new funding bids are provided for further projects.</p> <p>NWCUC leadership continually strive to ensure that the unit can remain active. The unit completes a multitude of tasks which far surpass the monetary value required to run it. Permanent funding streams would ensure that this service could continue. Even though the unit comprises an exceptionally small team, they are still able to provide significant and crucial support to investigations and operations.</p> <p>The increase in the designated points of entry and exit into the UK has placed a considerable strain on UK Border Force resources. After the UK left the European Union, this placed extra demands on UK Border Force as there was no longer free movement of trade and people from Europe to the UK.</p>
<div>Resources</div> 	<p>This is interlinked with funding limitations, as low funds mean that organisations are not always able to purchase vital equipment and software programmes or hardware. Offenders are becoming increasingly more technologically advanced and therefore it is crucial that law enforcement acquire the most effective and efficient resources to assist in identifying and tackling crime, particularly online and in remote locations.</p> <p>Some agencies require more sophisticated technological equipment, that assists with identifying species and run DNA examinations. There have been some cases showcased by the NWCUC where forensic DNA was pivotal in evidencing the illegal wildlife trade and the illegal wild taking of UK species.</p>
<div>Non-priority</div> 	<p>Wildlife crime offences, including the illegal wildlife trade, do not feature within any of the Police forces control strategies and therefore are not deemed a high priority. This is also the case for other law enforcement bodies such as UK Border Force and the National Crime Agency as well as Government bodies such as APHA, Defra and the Environment Agency.</p> <p>The illegal wildlife trade should be dealt with as a serious financial crime as this is the fourth largest illegal trade commodity in the world. If these types of offences are recognised as such then law enforcement, government and non-government agencies would be compelled to prioritise and provide resources to tackle IWT trade offences.</p> <p>Internationally wildlife crime falls under the umbrella of environmental crime. This is not reflected within the UK policing, who have combined wildlife with rural crime.</p>

2 | Challenges have been identified through 1-2-1 focus group meetings with numerous partnership agencies involved in the tackling of IWT.

Current picture

Chart one

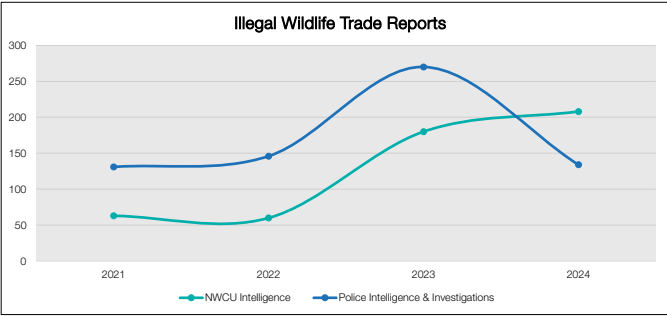


Chart two

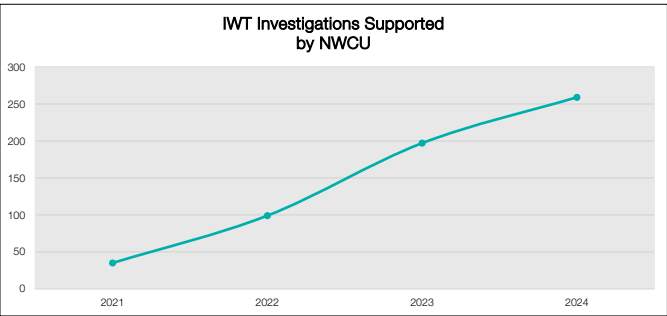


Chart three

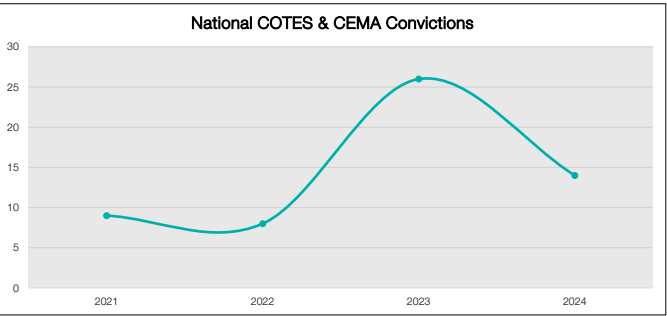


Chart four

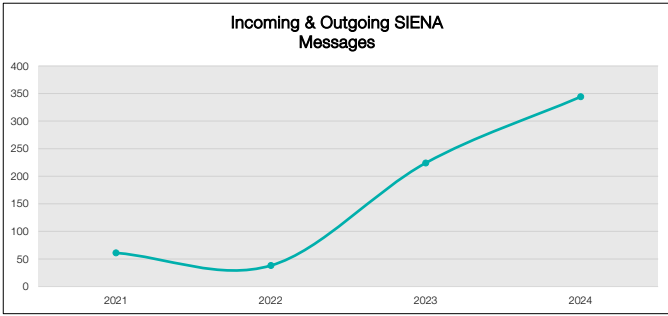
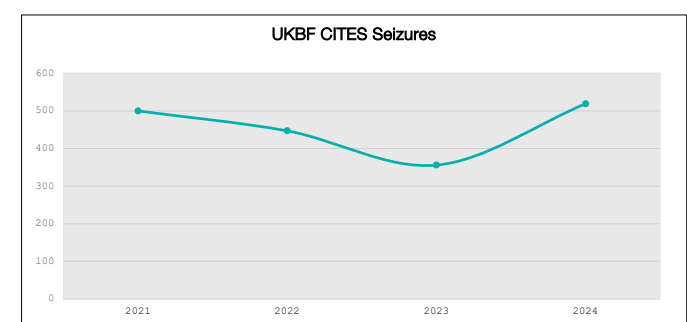


Chart five



Intelligence over the last three years, has seen an overall increase, an improvement in data quality and highlighted a stronger engagement with partnership agencies.

Despite the NWCU being made up of a small unit (18 members of staff), the level of support provided to IWT investigations and operations by the NWCU has grown exponentially, rising from 35 to 259 cases per year over the last four years. The involvement within the investigations has led to a greater understanding of the illegal wildlife trade. Any restrictions of funding for the unit, would naturally impact on the level of service and support provided and consequently the UK approach to tackling IWT.

Whilst conviction levels remain relatively low, this may be indicative of the fact that CITES and CEMA offences are not a current priority for Police forces and CPS and does not fully reflect the disruptive activity undertaken. It is acknowledged that early engagement with CPS is crucial for the prosecution process, however this is hampered by competing priorities and workloads.

Where convictions have been successful, penalties are typically light, with custodial sentences being less likely. An aggravating factor is the lack of understanding around COTES & CEMA offences, and intelligence suggests that there is a continued lack of understanding around legislation and guidelines. There are currently no sentencing guidelines for IWT.

In addition, there is a significant issue around the length of time it takes for an investigation to reach court, with some cases taking up to five years. This exceeds the government average of around two years per prosecution.

JNCC provide valuable witness statements that can assist the judiciary with understanding the environmental and species impact of offences, alongside veterinary statements which highlight the welfare aspects. These reports should be utilised where possible.

Liaison and collaborative working with overseas counterparts have seen significant successes over the last three years. This is reflected through substantial rises of incoming and outgoing SIENA messages as well as the NWCU providing support and leading on international operations.

The United Kingdom is a primarily a demand country for the illegal wildlife trade, which is reflected in the INTERPOL threat assessment data. A vast



range of CITES listed species are being illegally imported, which includes both flora and fauna. The picture at the border is not always reflective of what is being seen inland.

2024 seizures saw the highest levels since 2021, following a dip during 2023. Overall reptilian goods are consistently most common, which predominantly relate to fashion goods.

Plant seizures saw a rise during 2024, which is partially because of changes in processes following the UK leaving the European union. Partnership work between APHA and UKBF was conducted to deliver educational guidance to traders as opposed to prosecutions.

There is a very limited capacity government operated facility for the control of live exotic species seized by Border Force, where there is a requirement to quarantine live animals. In relation to handling and care of live species Border Force relies totally on relationships built by their CITES team with private entities involved in the exotic trade, such as zoos and collectors to provide long term care and control of the live species once seized.

CITES Management authority are conducting work in relation to housing of exotic species, which require quarantine. Defra have agreed that this needs to be looked at, however this is still in its infancy, a potential suggestion is the improvement of current facilities, but this will not be a quick time solution.

Collaboration between the NWCU and UK Border Force is a key element to tackling the illegal wildlife trade, a positive example of this is the mapping of two organised crime groups identified following successful Border Force seizures. NWCU and Border Force are continuing to work together with other agencies to dismantle these networks.

Despite being a demand country, the UK also has its own native CITES listed species that are being threatened by the illegal wildlife trade. The European glass eel (*Anguilla anguilla*) and specific birds of prey species, such as the Peregrine Falcon are most prominent.

The targeting of these species is not exclusive to the UK with the European eel also being targeted in other European countries.

UK partnerships & future commitments

The body of legislation that implements CITES in the UK largely derives from the EU and was designed to administer a common EU-wide system. In some instances, this includes additional safeguards or controls that have been introduced for conservation and practical purposes that go beyond the minimum requirements set out by CITES.

Under the [Retained EU Law \(Revocation and Reform\) Act 2023](#) (“REUL Act”) there is an opportunity to review CITES implementing legislation to ensure that it is clear, proportionate, and fit

for purpose for the UK as a single CITES Party, enabling a more coherent and effective legal regime. This is being drafted under a COTES reform group, which is led by Defra and includes consultation with APHA, JNCC, Kew, NWCU and UK Border Force.

Regular liaison with key stakeholders such as APHA, Border Force, Defra, JNCC and Kew is crucial to strengthen a two-way avenue for support, guidance and advice. This process has helped the NWCU focus on sophisticated criminal networks as opposed to individuals committing crime because of unintentional non-compliance with regulations.

The NWCU will continue to ensure attendance and provide guidance from a policing perspective to various multi-agency meetings including APHA case meetings, the CITES Officers Group (COG), CITES Sustainable Users Group (CSUG), Border Force monthly meetings, biannual ivory group meetings and the Wildlife Crime Conservation Advisory Group.

IWT is typically a cross-border crime and therefore partnership working is crucial. Crimes of this nature cannot be fully tackled if enforcement bodies, agencies and counterparts within other countries work in silos. The NWCU will continue to reinforce partnership working to ensure that offenders, networks and hierarchy chains are identified, understood, dismantled and brought to justice.

An excellent example of this is the yearly multi-agency collaboration for the European eel season, where various law enforcement and government agencies have come together to identify and tackle the illegal trade.

International partnerships & future commitments

Over the last three years extensive progress has been made around strengthening partnership working with overseas counterparts including Europol and INTERPOL. There are several successful examples of this including actively engaging within the European Operation Lake, Operation Empact and attending all relevant Europol and INTERPOL meetings. Successful growth of international intelligence sharing is reflected within the increase in SIENA messages submitted to and from the UK.

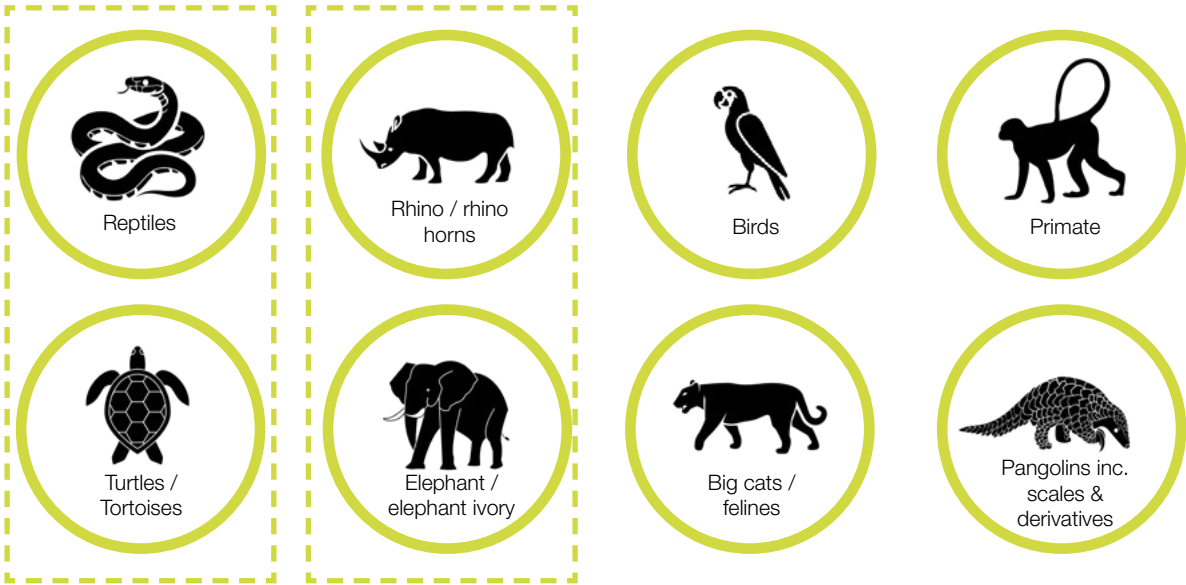
The head of the NWCU is also the chair of the INTERPOL International Wildlife Crime Working Group (WCWG). This has opened new avenues for greater international working, which is a key element to tackling sophisticated global networks.

When the UK left the EU in January 2020, this presented several challenges, in respect of understanding, monitoring and tackling the illegal wildlife trade. Changes in legislation and processes masked a lot of illegal activity, because the CITES listed species could no longer move freely between

the EU and the UK. Therefore, initially it was hard to determine whether individuals were unknowingly committing offences through process changes or whether genuine illegal activities were being committed.

In 2024, the INTERPOL Secretary General and the Board of the Working Group on Wildlife Crime commissioned a Global Wildlife Crime Threat Assessment. An NWCU analyst was assigned to provide INTERPOL with expertise and help with the production of the Threat Assessment. Data sources derived from INTERPOL member countries, INTERPOL subject matter experts and NGOs to assess the threat level presented by wildlife crime at global and regional levels. It is envisaged that this will further increase the UK standing and reputation within this arena.

The Threat Assessment is a practical analytical product that highlights the areas of highest risk and makes recommendations for law enforcement and partners to tackle these issues. The assessment identifies eight priority species:



Building on the UK model of priority delivery groups for wildlife crime, new working groups have been established to tackle threat and risk across these eight priority areas. The Head of the NWCU oversees these groups globally.

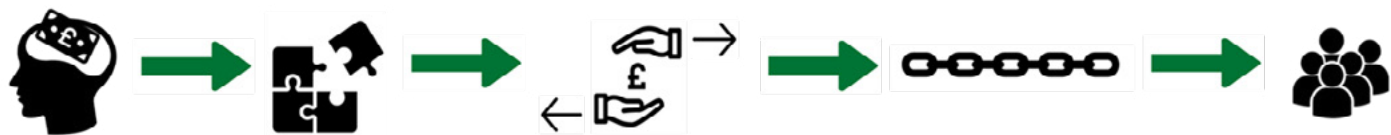
The Threat Assessment highlights that wildlife crime is a complex crime where criminal networks operate with sophistication and expertise. The illegal trade in wildlife represents a relatively low-risk, high-reward illicit market which criminal networks have evolved to exploit. The misuse of legal business structures, the exploitation of weaknesses in the CITES document system and corruption are pervasive issues which raise the threat level globally. This is also reflected within the UK picture.

The analysis highlights that wildlife crime converges with other types of criminality and must not be viewed as a standalone crime. Money laundering, illicit financial flows and corruption converge closely with the illegal wildlife trade. The assessment also identifies examples where wildlife crime converges with other types of environmental crime (including forestry crime, illegal mining and fisheries-related crime) and trafficking in illicit goods (including firearms and drugs).

In late 2024, the head of the NWCU launched the global threat assessment at the annual Wildlife Crime Working Group, which brought together law enforcement, Government bodies and the private sector. The power of partnerships is invaluable, and it would be beneficial to hold such events on a more regular basis to ensure a greater multi-agency approach.



Illicit finances linked to illegal wildlife trade



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

Financial intelligence is a key piece of the puzzle to understanding the true picture, as there is always a source, transit and destination country involved in these crimes. The illegal wildlife trade knows no borders and therefore communication and good quality, reliable information sharing is crucial, not only between law enforcement and partnership agencies, but also between other countries.

Following the money flows may help to establish links between people, addresses and organisations, which in turn can assist with identifying networks/organised crime groups and in some cases may outline a clear hierarchy.

The illegal wildlife trade is a transnational crime which is predominantly linked to money laundering. Crimes of this nature need to be recognised as a serious financial crime. This highly organised criminality is appealing to offenders as it typically results in a high return and poses a lower risk when compared with trading and movement of other commodities (people, drugs and firearms) where penalties are more severe.



Three NWCU members of staff trained as Financial Intelligence Officers (FIOs) in 2024.



One NWCU staff member to continue training to become a Financial Investigator (FI) in 2025.



At the beginning of the three-year project, it was acknowledged that although the UK had clear processes to determine national wildlife crime priorities, there were still significant challenges around properly assessing the scale of IWT related money laundering within the UK. This mirrored the global picture with extremely limited financial investigations running alongside IWT investigations and low levels of confiscation investigations being completed post-conviction.

Throughout the project, there has been limited capacity and capability within police forces and NWCU for financial investigations. However, three members of the NWCU have undertaken the NCA financial intelligence officers accredited training, with one of the staff members continuing the training to become a financial investigator. This is a pivotal and exciting step towards increasing the NWCU's capabilities to run financial investigations and intelligence development. It is expected to assist with identifying and tracing money flows.

During 2023 a significant risk was identified which suggested that some UK illegal trade is potentially being used to fund serious organised crime and terrorism within other countries. Development is underway to confirm or negate this. However, it has also been identified that some offenders of IWT are financing the trade through commodity payments, which also presents challenges in understanding the market.

In the respect of links to terrorism and serious and organised crime, where appropriate intelligence and evidence is being shared with the NCA and the relevant law enforcement bodies and Government agencies. If this threat is confirmed, then this strengthens the recommendation that a more robust approach to ensure that processes and checks are conducted to ensure that the regulations for wildlife trade are not exploited by criminals.

Significant progress has been made around linking in with financial units for financial profiling of key offenders linked to the illegal wildlife trade. Ensuring that the appropriate financial institutions receive the relevant training is crucial to assist with identifying offenders of IWT. A common theme noted within national wildlife crime workshops and events is that typically the global IWT trade is presented, as opposed to a knowledge of the issues impacting on the UK.

NWCU are currently examining implementing a digital financial tool kit for financial investigators. This is envisaged to comprise of e-learning packages and best practice examples and guidance to assist with how to identify links to IWT. It will also aim to help investigators recognise that IWT is concealed within the legal trade.

The NWCU are currently drafting a 4P Plan for illicit finances and an illicit finance working group will be set up during 2025. The 4P Plan will provide realistic objectives and outline actions for law enforcement, government and non-government agencies which fall under headings of Prevent, Prepare, Protect and Pursue (4 Ps). It is envisaged that this group will meet on a quarterly basis and will seek to coincide with the UK's Priority Delivery Groups (PDGs) for Wildlife Crime.



UK Partnerships & Future Commitments

A two-way support process has been established between the NWCU and the UK Financial Intelligence Unit (UKFIU), with the UKFIU providing valuable guidance and support to the members of staff who have trained as FIOs. Similarly, the NWCU have been supporting the UKFIU with advice around IWT and provided them with keyword glossaries to assist with the identification of financial intelligence.

The NWCU have featured within UKFIU PODCAST interviews alongside the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), which examined IWT and the links to money laundering.

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

International Partnerships & Future Commitments

Project Anton was created on 31st January 2023 and is led by Scotiabank and supported by The Royal Foundations United for Wildlife Network. It was founded by Prince William, FINTRAC, AUSTRAC's Fintel Alliance in Australia, the South African Anti-Money Laundering Integrated Task Force, the UK Financial Intelligence Unit, Western Union and numerous other governments, law enforcement and

non-governmental organisations in Canada and around the world. This combines unique knowledge, expertise and tools to assist with combating the illegal wildlife trade³. The NWCU ensure that there is attendance at all Project Anton meetings, where possible and develop any illegal wildlife trade intelligence received from the project.

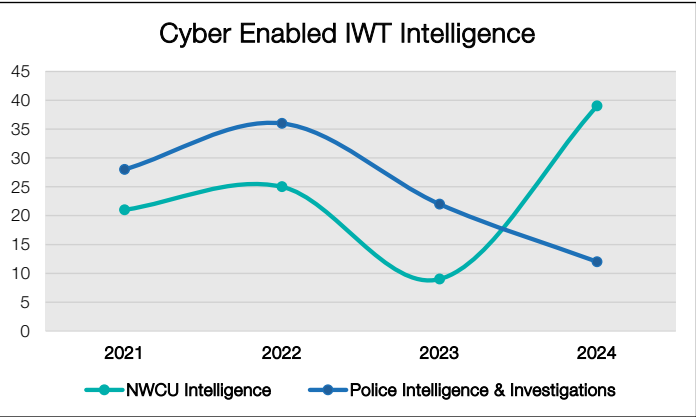
The IWT Financial Flows Toolkit is aimed at supporting governments and financial institutions to raise awareness of IWT helping them identify and mitigate suspicious transactions associated with illegal wildlife trade⁴.The toolkit builds on the landmark UK-UAE Partnership agreement to tackle illicit financial flows, formed in September 2021.

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



3 | FINTRAC publishes money laundering indicators related to illegal wildlife trade in support of Project Anton - Canada.ca
4| Obtained from TRAFFIC Website – Toolkit was produced by UK Minister Lord Tariq Ahmad of Wimbledon in collaboration with his Excellency Ahmed Ali Al Sayegh.

Cyber enabled illegal wildlife trade



**Please note Police Intel & Investigations have been collated through keywords and do not represent the whole of 2024. **

Levels of intelligence are exceptionally low; however, successes cannot always be measured by intelligence alone. Over the last three years open-source intelligence (OSINT) training including evidential captures has been provided to five members of the NWCU. This has led to open-source research being embedded into daily business within all appropriate investigations. OSINT has helped to enrich the intelligence picture within 19 international IWT operations including two organised crime groups.

It is anticipated that there will be a rise in cyber enabled IWT intelligence during 2025.

Cyber-crime is an ‘umbrella’ term for lots of different types of crimes which either take place online or where technology is an enabler. As society becomes increasingly digitised, so too does criminality and there is nearly always a digital element within the illegal wildlife trade. The internet has been identified as a common facilitator within the illegal wildlife trade. Marketing sites are a key method for sellers to advertise and distribute their illegal wildlife stock, enabling offenders to both facilitate and engage in criminality.

Cyber enabled wildlife crime ultimately allows criminality to continue.

Challenges arise when examining advertisements and images for sale on internet sites, as there may not always be sufficient details/evidence to confirm whether they are in fact CITES-listed or protected. The NWCU, government partners and NGOs, particularly TRAFFIC have been liaising with popular marketing platforms to help combat this.

UK Partnerships & Future Commitments

Positive steps have been made towards collaborative working as a multi-agency approach is required to tackle crimes of this nature. At the beginning of the three-year project cyber enabled wildlife crime was a priority within its own right and had its own priority delivery group. However, as the NWCU evolved and it became clear that cyber is a cross-cutting theme for all wildlife crime, it was determined that cyber should not sit as a separate priority but dealt with as daily business under each wildlife crime threat group. The NWCU have recently created a cyber network to replace the cyber PDG, which is a multi-agency group of specialists that can together aim to tackle cyber enabled wildlife crime.

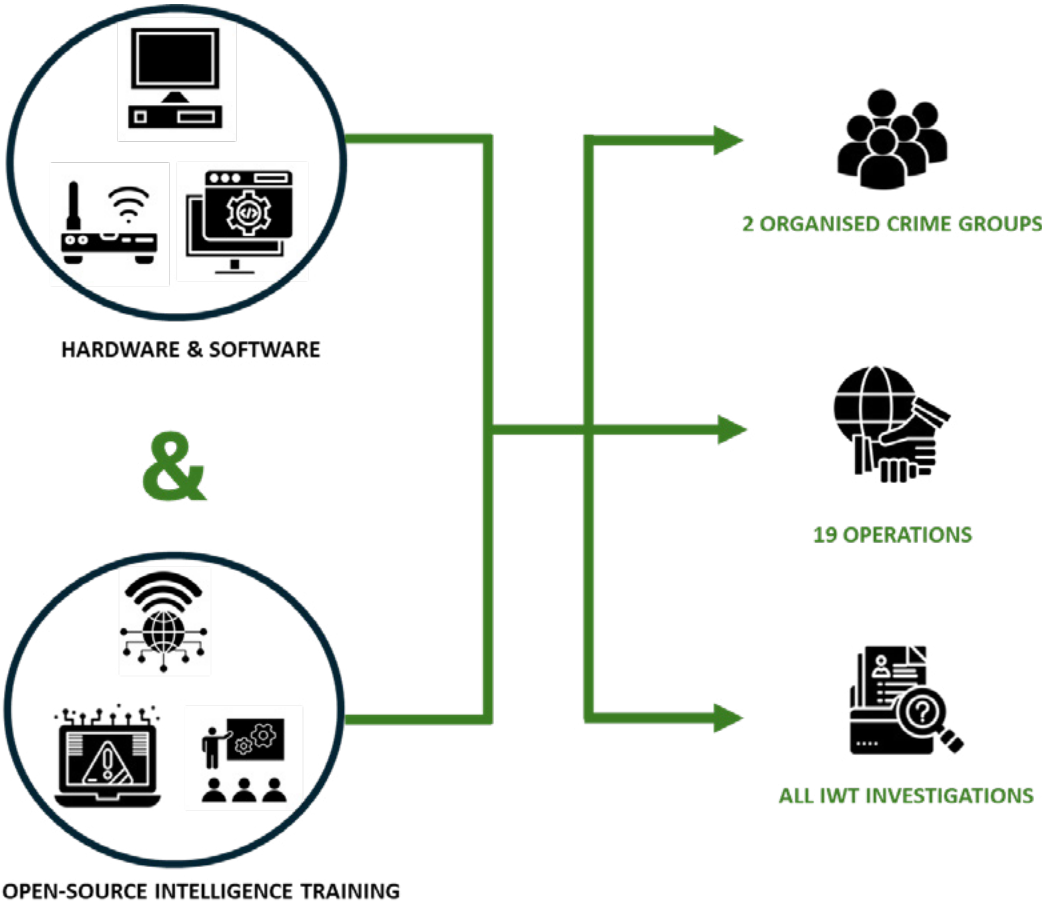
Support from companies such as IFAW, can also help understand the online illegal trade picture. Their recent research project that examined three years’ worth of open-source data, to identify any changes within the illegal sale of ivory, since the implementation of the Ivory Act 2018 in 2022, corroborated police intelligence that the trade has seen a healthy decrease in levels since the enactment. Projects such as this can be invaluable to our understanding when we merge data collections.

International Partnerships & Future Commitments

The NWCU have been collaborating with online marketing platforms to discuss the role of NWCU, the approach and capability to tackle trade in CITES-listed items on marketing platforms and opportunities for closer working. The volume of sales, the legal variations between countries and the sheer number of CITES listed species are a challenge, but some organisations implement a system where keyword searches are applied to new adverts to see if they should be referred for assessment prior to going live. Some organisations are keen to have quarterly meetings with NWCU to ensure that their keywords are up to date from a UK perspective.

Marketing media organisations have also been collaborating with other partners such as Kew, to assist with tackling the illegal trade of plants. The NWCU will be able to draw upon any results received to feed into the UK picture.

Operation EMPACT is a Europol security initiative that has various operational actions that sit within it. Operational action (OA) 5.1 surrounds Environmental crime which also encompasses wildlife crime. O.A 3.1 relates to cyber enabled crime.



Organised Crime Groups (OCG) linked to illegal wildlife trade

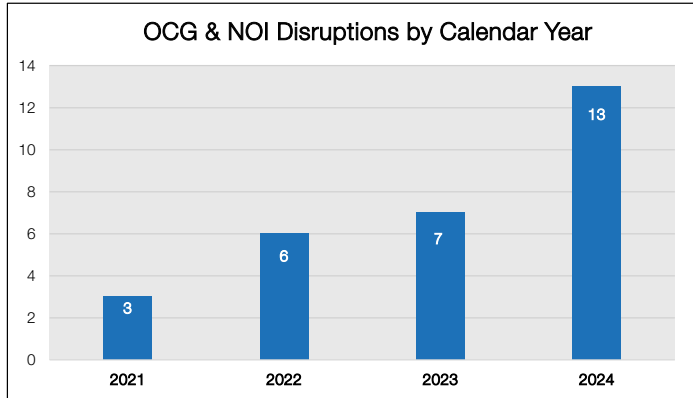
Operation name	IWT threat	Assessment date
OCG1	Parrots	16/10/2024
OCG2	Parrots	12/11/2024
OCG3	Taxidermy	11/11/2024
OCG4	Bird Eggs	26/11/2024
OCG5	Birds of Prey	12/11/2024

There are six mapped OCGs currently being managed by the NWCUC. One has not been included within the adjacent table due to sensitivities.

OCG5 has since been dismantled and will be archived.

Nominals of Interest (NOI)	IWT threat
6	Birds of Prey
8	Monkey Torture

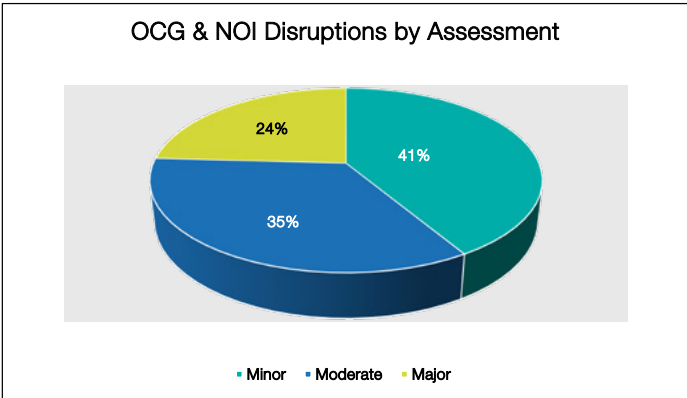
There are currently fourteen NOIs being managed by the NWCUC. Six of which relate to the illegal trade of birds of prey, predominantly peregrine falcons. Eight relate to a global online monkey torture network, where British nominals have been paying individuals to torture baby monkeys over live stream.



Steady increases have been seen over the last four years.

Just under a quarter of disruptions were assessed as major and were conducted within 2024.

Two relate to substantial seizures following a warrant execution and three relate to custodial sentencing of NOIs, one sentencing resulting in a fine and a ban in trading in birds of prey for five years and one POCA result.



The NWCUC have embedded an OCG mapping process, which is recorded onto PND and MoRiLE assessments on APMIS (Agency & Partner Management Information System). Each OCG and operation is recorded with a MoRiLE risk assessment.

The identified networks have links to international groups/individuals. Therefore, cross border working with law enforcement outside of the UK is crucial when identified. The sharing of information will help to provide a greater understanding and assist with highlighting the biggest threats to and within the UK.

It is important that UK based OCGs, especially those committing cross-border, transnational or international criminality are identified and mapped. This will help to ensure that appropriate resources are assigned to proactively target the most harmful members, who pose the most risk within the illegal trade. It will also assist with strengthening the argument to have wildlife crime added as an OCG threat option within national systems and approaches.

Over the reporting period significant steps have been made around identifying and understanding UK mapped criminal networks. It has been identified that globally wildlife crime is often convergent with serious crimes such as human trafficking and drugs.

Our understanding of mapped and unmapped networks has indicated poly criminality, with some transnational networks potentially engaging in other serious crimes such as money laundering and corruption.

An identified risk of zoonotic diseases has elevated the risk score of the illegal parrot trade OCGs, with many of the birds entering the UK illegally being identified as having psittacine circovirus (Psittacine

beak & feather disease). As these birds are not subjected to health examinations this poses a serious health risk in the UK, which is not restricted to illegally traded birds but relates to any trafficked CITES listed species, which could potentially lead to another global health pandemic.

UK Partnerships & Future Commitments

Regular meetings with Border Force have helped to enrich the OCG picture, especially around identifying potential new networks. Joint investigative working is embedded as daily business, the Head of the UKBF CITES team is also the chair of the CITES Priority Delivery Group, which ensures that Border Force have an oversight of NWCUC and Government agency investigations and operations.

International Partnerships & Future Commitments

All the mapped IWT OCGs, except for one network have identified international links. As part of the intelligence development within each of these operations, liaison is being made with respective countries to assist with tackling these networks. Appropriate intelligence is being shared through the Europol messaging system SIENA along with any requests for intelligence that overseas counterparts may hold.



Appendix A - case study

Operation Tantallon

The illegal trade of peregrine falcons taken from the wild from Scotland and the North of England. The birds were transported into the republic of Ireland to Europe before being traded into the primary market of the Middle East and the Dubai / UAE. The illegal trade of the peregrine falcon is extremely lucrative and in high demand, it is seen as a status symbol within the Middle East.



Lewis Hall
12/02/2024 sentenced
150 hours unpaid work
Banned from keeping birds of prey for five years

10/10/2024 POCA: Total £110,000
benefit from criminality
£27k+ immediately forfeited
HMRC investigation ongoing



Timothy Hall
12/02/2024 sentenced
220 hours unpaid work
Banned from keeping birds of prey for five years



Glossary of terms

Acronym	Name
APHA	Animal and Plant Health Agency
APMIS	Agency & Partner Management Information System
CEMA	Custom and Excise Management Act
COG	CITES Officers Group
COTES	Control of Trade in Endangered Species
CPS	Crown Prosecution Service
CSUG	CITES Sustainable Users Group
Defra	Department for Environment, Food & Rural Affairs
DICE	Durrell Institute of Conservation & Ecology
EMPACT	European Multidisciplinary Platform Against Criminal Threats
FINTRAC	Financial Transactions and Reports Analysis Centre of Canada
IFAW	International Fund for Animal Welfare
IWT	Illegal Wildlife Trade
JNCC	Joint Nature Conservation Committee
NWCU	National Wildlife Crime Unit
OCG	Organised Crime Group
OSINT	Open Source Intelligence
PDG	Priority Delivery Group
PNC	Police National Computer
PND	Police National Database
POCA	Proceeds of Crime Act
ROCU	Regional Organised Crime Unit
RUSI	Royal United Services Institute
SIENA	Secure Information Exchange Network
UKBF	UK Border Force
UKFIU	UK Financial Intelligence Unit
UKTCG	UK Tasking & Coordinating Group
UNODC	United Nations Office on Drugs & Crime