

Addressing corruption in CITES documentation processes

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Key takeaways

- » Abuse of Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) permits and certificates is a global issue that affects a wide range of species and can take place across the entire trade chain. Commerce in precious timber, caviar and live animals including primates, birds and reptiles, is particularly vulnerable.
- » Methods of abuse range widely and all can be facilitated by corruption. The involvement of corrupt officials, including high-level individuals, makes this problem more difficult to solve.
- » Multiple strategies are needed to reduce opportunities for abusing CITES permits and certificates. They include:
 - » **Prosecuting corrupt officials** for violating national laws and international conventions;
 - » **Introducing an e-permitting system**, such as [eCITES](#), to rapidly streamline and automate CITES processes and controls digitally;
 - » **Ensuring adequate monitoring and subsequent sanctions** for violators of any permitting system;
 - » **Ensuring adequate scientific and technical training** for relevant officials (including those from law enforcement and CITES Authorities) to identify abuse when issuing and inspecting documents;
 - » **Applying measures to make paper documents more secure**, considering measures outlined in [CITES Resolution 12.3](#) on permits and certificates, and other guidance provided by the CITES Secretariat.

The problem

CITES regulates the international trade in approximately 36,000 species of plants and animals. Trade in specimens of species listed in the CITES Appendices requires issuance of official trade documentation in the form of permits and certificates. This system gives rise to numerous possibilities for corrupt practice, both when documents are issued and upon inspection at border crossings. Each member government (Party¹) to the Convention must designate one or more Management Authorities that are in charge of administering that licensing system, and one or more Scientific Authorities that advise on the effects of trade on listed species. Permits (see Box 1) should only be issued if the CITES Authorities are satisfied that the export will not be detrimental to the survival of the species and that the specimens were obtained legally. A stronger understanding of the extent and forms of document abuse and how corruption facilitates it is vital for identifying appropriate measures to address this problem.

¹ A State or regional economic integration organization for which the Convention has entered into force is called a Party to CITES. Currently there are 183 Parties.

Often all that is needed to make a shipment of illegal wildlife appear legal is documentation, which may be a piece of paper in a non-standard format. Once exported with seemingly correct documents, importing countries are very unlikely to challenge the legality of a shipment, often fearing the repercussions of questioning the integrity of the issuing authority ([OECD 2017](#)). This underlines the importance of reducing opportunities for corruption to facilitate document abuse before the wildlife enters “legal” trade and the opportunity is lost.

Data analyzed

The data considered in this analysis² draws from the following sources:

- A rapid review of English language TRAFFIC publications on wildlife trade from 2010–2019.
- A limited number of non-TRAFFIC publications were also reviewed.
- Examination of CITES Notifications to identify cases of document abuse.
- Analysis of TRAFFIC’s Wildlife Trade Information System to identify seizures occurring between 2010 and 2019, in which abuse of documents was reported.

² This Brief focuses on the abuse of CITES documents that facilitate trade that is declared in some way (versus smuggled), and where there is a genuine intention of trade. (Compared, for example, with known online scams where potential customers are shown fake CITES permits, relay payment, and wildlife products offered for sale do not exist.) A wide range of non-CITES documents such as hunting and logging permits, veterinary certificates, phytosanitary certificates, transport waybills and invoices throughout the trade chain may also be subject to abuse with associated corruption.

Box 1. Types of CITES documents

Permits

According to the [CITES definitions](#) and [Resolution Conf. 12.3 \(Rev. CoP18\)](#), a permit is an official document issued by a CITES Management Authority to authorize the export of a specimen of a species included in Appendix I or II, the export of a specimen of a species included in Appendix III from the State that included the species therein, or the import of a specimen of a species included in Appendix I. To be valid, a permit must conform to the requirements of the Convention and the Resolutions of the Conference of the Parties. For example:

- » An **export permit** may be issued only if the specimen was legally obtained; the trade will not be detrimental to the survival of the species; and, for Appendix-I listed species, an import permit has already been issued.
- » For specimens from species listed in Appendix I, an **import permit** is issued by the Management Authority of the importing Party. This should be issued only if the specimen is not to be used for primarily commercial purposes and if the import will be for purposes that are not detrimental to the survival of the species. In the case of a live animal or plant, the Scientific Authority must be satisfied that the proposed recipient is suitably equipped to house and care for it.

Certificates

A **certificate** is also an official document issued by a Management Authority and used to authorize different types of trade in CITES specimens, the most important of which are:

- » Re-export certificate
- » Pre-Convention certificate
- » Certificates of origin
- » Certificate of captive-breeding or artificial propagation
- » Certificate of introduction from the sea

Notifications

The CITES Secretariat issues **Notifications** to the Parties that contain information and reports on the implementation of the Convention. Notifications are used to officially communicate information on lost or stolen permits or security stamps, details on Parties’ legislation, and forthcoming meetings, among other examples.

What are the different forms of CITES document abuse?

Documented methods for abuse of CITES permits and certificates range widely (see [Musing et al. 2019](#), [Wyatt and Cao 2015](#)), including the following:

- **Intentional declaration of false information on documents:** Information is mis-declared (regarding species, quantity, source, value), sometimes due to applicants providing false information. This can reduce the chance of the shipment attracting attention, reduce the amount of tax paid, or falsely bring the shipment into compliance with export quotas.
- **Documents modified after issue:** Information is altered to allow trade that has not been authorised.
- **Unofficial payment for documents:** Exporters pay more than the official price to guarantee obtaining a permit or to obtain it faster.
- **Counterfeit documents:** Fake permits, sometimes of very high quality, are used fraudulently to trade specimens.
- **Re-using or photocopying documents:** The same permit is used multiple times or duplicated.
- **Expired documents:** Permits are used beyond the date of expiry.
- **Stolen documents:** Stolen permits can be used to trade CITES-listed wildlife, and/or permits may be declared as lost, damaged, or stolen, and the replacements used to trade wildlife. Government employees may even steal or falsely declare permits to be lost, then use or sell them.³

In every case, corrupt actions can be used to smooth the way for these abuses, avoid detection, and/or avoid penalties when they are detected.

An example of CITES permit counterfeiting

In 2009, five Marco Polo Sheep (*Ovis ammon polii*) and two Markhor (*Capra falconeri*) trophies were exported from Tajikistan to Russia using CITES permits. The quality of the falsified permits was so high that at first it did not arouse suspicion, and only direct comparison of the permits' details with information logged by the Russian Management Authority revealed the fraud (Vaisman et al. 2013). This illustrates the high quality of some counterfeit documents and the difficulty posed to officials who are responsible for detecting them.

How widespread is document abuse and what is the role of corruption?

Document abuse

It is not possible to estimate the true scale of document abuse or the proportion facilitated by corruption, as it is a largely unreported, illegal activity. Examples of abuse come to light through investigations or arrests that provide an indication of the nature of the practice. CITES document abuse cases captured in reports on illegal wildlife trade cover a wide range of species and commodities, from caviar to timber, other plants, live reptiles, birds, and primates (see [Figure 1](#)). Falsely declaring the source of CITES-listed specimens appears to be a common form of abuse; in many cases specimens are stated to be captive-bred when they are, in fact, wild caught. Many of the known cases of CITES document abuse have involved West and Central African countries and Southeast Asia, although the diversity of examples indicate that this is a global problem.

Of the nine CITES Notifications issued between 2010 and May 2019 that involved document abuse, seven were issued because of concern over the authenticity of permits/certificates, and three related to stolen/lost permits that could potentially be in circulation. One stated both reasons.

³ According to Interpol, multiple cases of government employees stealing blank CITES documents have been reported, either for money, to gain influence or a favour, or because they are being extorted ([Wyatt and Cao 2015](#)).



CAVIAR

Recent studies have found a variety of abuse types used in Bulgaria and Romania. These include **sale without the mandatory CITES labelling, labelling not in compliance with CITES requirements**, and **labelling not containing all required information**. Wild-sourced caviar was also **deliberately mislabelled** as aquaculture derived, and aquaculture-derived caviar was deliberately declared as wild-sourced, or as a different species in order to sell at a higher price. **Falsified or forged CITES documents** and **genuine CITES documents issued corruptly** were also reported ([Jahrl 2013](#); [Harris and Shiraishi 2018](#)).



PRIMATES

Between the early 2000s and 2007, large-scale document abuse involving primates was reported in Southeast Asia ([Wyatt and Cao 2015](#)). An investigation by a Vietnamese newspaper revealed that **permits were being modified**. The journalist found that apart from the date of issue, the copy of the permit that the Vietnam Forest Protection Department had, which was issued by authorities in Lao PDR, had “virtually entirely changed” compared to the original permit.



BIRDS

Between 2004 and 2012, documents accompanying live exports of a wide range of bird species were suspected of **incorrectly stating that the birds had been captive-bred** in the Solomon Islands. In fact, they were likely wild-caught in Indonesia and Papua New Guinea and “laundered” through the Solomon Islands ([Shepherd et al. 2012](#)).



ROSEWOOD

The CITES Management Authority of Cambodia confirmed that it had not issued any CITES export permits for Siamese Rosewood (*Dalbergia cochinchinensis*) (CITES Appendix II) since its listing in 2013, and Notification No. 2017/023 states that any permits are therefore counterfeit ([No. 2017/023, 2017](#)). Vietnam, however, has reported importing sawn wood and timber from Cambodia annually between 2013 and 2015 which totalled over 8,200m³ ([CITES 2019](#)), all of which presumably took place using **counterfeit permits**.



REPTILES

In 2004-2005, Thai wildlife dealers **mis-declared the origin** of a number of presumably wild Malagasy reptiles as Lebanon and Kazakhstan, even though these countries had insufficient or no legal stock to supply these exports. Thai traders allegedly did so to prove legal importation into Thailand before they applied for re-export permits and traded the reptiles into the “legal” international trade ([Todd 2011](#)).



ORCHIDS

Researchers observed wild-harvested orchids being laundered through commercial greenhouses in Thailand and Malaysia and subsequently exported to Singapore with **CITES permits falsely reporting them as artificially propagated** ([Phelps 2015](#)).

Figure 1. Documented cases of CITES permit and certificate abuse involve a wide range of species and countries

The role of corruption

Corruption among government officials is a key enabling factor in the illegal wildlife trade ([UNODC 2012](#)). Corruption has not been identified in all cases of document abuse, and a degree of abuse is likely to occur without corruption. However, corruption can greatly facilitate the use of all the techniques listed above, and examples where it has been alleged (including some involving high-level officials) are provided as case studies in *Figure 2*. There is often no need to falsify documents, as “legitimate” documents can be obtained directly from corrupt officials ([UNODC 2012](#)).

Factors that can facilitate corruption

Although some examples of CITES document abuse seem relatively small-scale, others indicate the involvement of organised criminal networks with global reach. A number of the cases detailed in this Brief involved government officials.

Issuance of CITES documents is an important corruption risk point. The person(s) responsible for issuing the documents is in a position of power as a gatekeeper and can be susceptible to bribery or may extort bribes in order to speed up or circumvent procedures. Regulations and processes that leave wide discretion to those who issue or inspect documents may encourage extortion or offers of

Figure 2. Case studies where corruption was alleged in the abuse of CITES documents, including cases involving high-level officials

Guinea

- Intentional declaration of false information on permit
- Involvement of corrupt officials alleged

Between 2009 and 2011, in what may be the most high-profile case of CITES permit abuse and associated corruption, fraudulent export permits were issued for a large number of apes. While the permits stated that the apes were captive bred, there are no known captive breeding facilities in the country ([UNODC 2016](#)). The head of the CITES Management Authority was arrested in 2015 and was eventually incarcerated when caught selling official, signed CITES documents, which he had retained after leaving the Management Authority, to anyone seeking to export a listed species ([OECD 2017](#)). Relevant CITES Notification: No. 2011/040, No. 2013/017

Source: <https://freethepes.org/category/guinea/>

Democratic Republic of the Congo

- Permits modified after issue
- Involvement of corrupt officials alleged

In 2016, permit irregularities from the DRC were identified by the CITES Secretariat. A permit issued by the Management Authority for the export of 200 wild Grey Parrots (*Psittacus erithacus*) to Thailand appeared to have been falsified; it was originally granted for 100 Red-fronted Parrots (*Poicephalus gulielmi*) ([UNEP-WCMC 2018](#)). Exports of Red-fronted Parrots from DRC have risen five-fold since Grey Parrots were transferred to Appendix I, leading to suspicions of an increase in the fraudulent use of permits to export Grey Parrots ([Martin et al. 2019](#)). The intergovernmental Lusaka Agreement Task Force worked with DRC authorities to initiate investigations, which led to the arrest of a staff member from the DRC Management Authority ([SC70. Doc. 30.1](#)). Relevant CITES Notification: No. 2013/051

Madagascar

- Photocopied permits
- Corrupt payment to receive permits
- Involvement of corrupt officials alleged

Exports of rosewood from Madagascar have allegedly been subject to abuse, with reports of photocopied export permits used fraudulently on containers. Officials have also been bribed by operators in order to receive permits ([Ratsimbazafy et al. 2016](#)).

Nigeria to China

- Corrupt payment to receive permits
- Involvement of corrupt officials alleged

In early 2017, approximately 4,000 export permits to authorise Customs clearance of more than 10,000 containers of Kossa (*Pterocarpus erinaceus*) were reportedly issued retrospectively by the Nigerian CITES Management Authority, after the containers were detained at the Chinese border ([EIA 2017](#)). At the time they were detained, the species was listed in Appendix III, and the containers lacked valid required CITES certificates of origin. It was alleged that senior officials were bribed by industry actors to facilitate the “legalization” of the rosewood timber. CITES [Resolution 12.3](#) on Permits and Certificates, recommends that exporting Management Authorities do not issue permits retrospectively, and importing countries do not accept them, as it creates a loophole that allows for illegal trade. *Relevant CITES Notification: No. 2018/005*

Nigeria to Malaysia

- Intentional declaration of false information on permit
- Involvement of corrupt officials alleged

In 2001, four gorillas were imported from Nigeria for the Taiping Zoo in Malaysia, using apparently valid CITES import and export permits reporting the animals as captive-bred. They were later found to be wild-caught ([Beastall et al. 2016](#)). The investigation of this case by the CITES Secretariat disclosed that the false declaration of captive breeding was known to the Nigerian authorities and, thus the genuine permits were issued corruptly ([CITES 2002](#)).

South Africa to Vietnam

- Intentional declaration of false information on permit
- Involvement of corrupt wildlife professionals alleged
- Re-use of permits

A 2012 report highlighted multiple abuses related to trophy-hunted rhinos exported from South Africa to Vietnam, including allegations that corrupt professional hunters allowed individuals not named on the hunting permit to shoot rhinos or falsely obtained export permits for clients not named on the permit. Instances of this “pseudo hunting,” where the horn was in fact exported with the intention of selling it commercially, were documented. On the import side, rhino horn were only declared in the event of a Customs inspection; if no inspection was conducted then the un-surrendered CITES documents were subsequently re-used until they expired. The authors calculated that 74% of South Africa’s total rhino horn exports to Vietnam went undeclared at the time of importation ([Milliken & Shaw 2012](#)).

bribes to use that discretion in favorable ways. Cumbersome bureaucracy that causes extended processing and approval delays may also encourage such actions and may be exacerbated by weak administrative capacity ([OECD 2016](#)).

The position of the person issuing the documents varies from junior in some countries to senior in others ([OECD 2017](#)). The nature and scale of opportunities for and vulnerability to corruption is therefore variable. Evidence shows that corrupt actors who facilitate illegal wildlife trade include customs officials who are responsible for ensuring that CITES permits are legitimate, as well as a range of actors (including police and rangers) who may be bribed in order to obtain false documents ([Wyatt and Cao 2015](#)).

Further, the system of regulating trade in CITES-listed species is fraught with difficulties because of the imbalance in both ability and expertise of law enforcement, customs and CITES Authorities ([Viollaz et al. 2018](#)). A lack of scientific knowledge and technical expertise, including inability to detect fraudulent permits, prevents authorities from functioning fully, and can facilitate cover-up of corrupt practices ([Wyatt and Cao 2015](#)).

What strategies are available to reduce document abuse?

Some recommended strategies are outlined below to close opportunities for corruption related to document abuses and increase the likelihood of detecting it.

Prosecuting corrupt officials

Several cases outlined in *Figure 2* highlight the involvement of corrupt officials. In such instances, prosecution for violating national laws and international conventions in a timely, just fashion, is vital. Not only does this punish those individuals, it should also act as a deterrent to

others and contribute towards making the culture in departments/agencies one where corruption is not tolerated. A recently adopted [CITES Resolution on corruption](#)⁴ encourages CITES Parties, especially CITES Management Authorities, to work closely with existing national anti-corruption commissions and like bodies, law enforcement agencies, judicial authorities, as well as with relevant civil society organisations, to design and implement integrity policies. These might also include deterrence initiatives, such as mission statements, codes of conduct and 'whistle-blower' schemes.

In reality, however, even when investigations are carried out, it is rare that they result in a high-level government official being prosecuted. Instead they often stay in office, untouched, while lower-level individuals may be prosecuted. Law enforcement authorities and the judiciary are not immune from corruption, so investigations and subsequent court cases do not always proceed fairly. While international actors such as CITES, United Nations Office on Drugs and Crime (UNODC) and other [International Consortium on Combatting Wildlife Crime](#) (ICCWC) partners, and donor countries who support activities to address wildlife crime can apply pressure, strategies to prevent document abuse occurring in the first place are especially important in these situations.

Capacity building

The actors responsible for ensuring legal trade need adequate scientific knowledge and technical expertise to detect instances of abuse and prevent them from occurring in the first place. This should include those responsible for issuing and inspecting documents, such as CITES Management Authorities, customs and border control.

Capacity building can be supported by the CITES Secretariat, which can provide guidelines for the issuance and acceptance of documents⁵ and examples of fraudulent documents. Civil society groups, INTERPOL, UNODC, the World Customs Organization, and donors are able to provide training.

⁴ Resolution Conf. 17.6 Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention.

Sustainability can be a challenge in capacity building efforts, as staff may leave or be moved (sometimes expressly to reduce corruption risks). Steps to promote sustainability could include agreements to keep trainees in specific positions for a given period of time, a training-of-trainers approach to prepare some trainees to share their information, or self-training modules, along with corollary employment policies that reward delivery of new training or completion of self-training. No single approach will be right for every institution or circumstance, so careful advance work to assess the best options is an important first investment.

Electronic permitting systems

Electronic permitting can reduce corruption by removing interactions between the person applying for the permit and the person issuing it, therefore also removing the associated opportunity for a corrupt action to occur. An electronic system also should be able to detect use of stolen/expired permits and re-use of permits, as well as potentially detect fraudulent permits.

Many Management Authorities in exporting countries have not yet automated their processes, however. To address this, the CITES Secretariat, in collaboration with the CITES Working Group on Electronic Systems and Information Technology and the Automated System for Customs Data (ASYCUDA) programme of the United Nations Conference on Trade and Development (UNCTAD), has launched the [eCITES](#) initiative, a global effort to streamline and automate CITES permit processes and controls. Parties adopted two Decisions at CITES CoP18 inviting countries to consider implementing an electronic CITES system to increase transparency and efficiency of the permit system ([18.125c](#)) and for donor agencies to provide funding for implementation of [eCITES](#) where needed ([18.125b](#)).

While e-permitting has the potential to greatly reduce corruption in the issuance and use of CITES

documents, it alone is unlikely to stop document abuse. Electronic systems are more effective for dealing with petty corruption involving lower-level bureaucrats rather than grand corruption involving higher-level officials ([Baniamin 2015](#)), and no system can be totally impervious to corruption. To reduce opportunities further (particularly involving higher-level officials), the electronic system must be adequately monitored, and if anomalies are detected, remedial action should be taken.

Fraud-proof systems and technologies

A further Decision adopted at CITES CoP18 ([18.127e](#)) directs the Secretariat to work with relevant partners to explore emerging technologies including blockchain. There are high hopes that blockchain could be used to ensure trade chains of CITES specimens are traceable and resilient to fraud. The exact benefits are still not tested, and confusion and misconceptions about how a blockchain-based system could work in practice mean that relevant, experienced partners need to be engaged, for example those in the seafood industry.

As with e-permitting, while technology potentially can reduce the role of corruption in the issuance and use of CITES documents, it will not stop it fully – particularly when high-level officials are involved. Monitoring will still be required, and where irregularities are detected these should be investigated and sanctions imposed where necessary.

Increased security of paper permits

For countries that have not yet adopted an electronic permitting system, there are still ways to reduce the opportunity for abuse of paper permits. Many of these are outlined in [Resolution 12.3](#) on permits and certificates, such as:

- Use of the standard form provided for in the Resolution. Crucial vulnerabilities arise where non-standardised documents are used ([OECD 2018](#));
- Use of security paper for paper documents;

⁵ For example, Notification [No. 2001/003](#) provides clear guidelines which includes practical advice and checklists for issuance and acceptance of permits and certificates.

- Use of security stamps to indicate validity of each document;
- Provide the Secretariat with the names of persons authorised to sign documents and specimens of their signature. Communicate changes to authorised persons within a month;
- Improved communications protocols that mandate Management Authorities of issuing Parties to immediately inform destination Management Authorities of cancelled, lost, stolen or destroyed permits, as well as the Secretariat in the case of commercial shipments;
- Avoiding retrospective issuance of CITES documents by Management Authorities of (re-) exporting countries, as well as non-acceptance of such documents by Management Authorities of importing, transit or transhipment countries.

The way forward

Comprehensive protocols involving checks and balances are needed to reduce the risk of corruption that undermines the integrity of the CITES permitting system. This has been recognised under CITES processes, and efforts are underway to establish systems and guidance to support CITES Authorities in mitigating corruption risk. The recognition by governments of the importance of tackling corruption related to wildlife crime is a major step forward, as demonstrated by the first ever [Resolution](#) on Tackling Illicit Trafficking in Wildlife adopted at the UN General Assembly in 2017 and subsequent commitments; the European Union's 2016 [Action Plan](#) against Wildlife Trafficking; adoption of CITES [Resolution 17.6](#) on prohibiting, preventing, detecting and countering corruption in 2016; and the 2015 adoption of the African Union's [Strategy](#) on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa. All of these statements call on governments to address wildlife-related corruption.

The previous section describes several approaches for translating these commitments into action, but each approach relies on commitment and capacity to implement reforms and follow up on violations. Careful evaluation of the context for these reforms

to assess the stakeholders, power dynamics, and other conditions that may support or inhibit effective implementation is an important step in any plan for improving outcomes. An [Integrity Guide for Wildlife Management Agencies](#) developed by UNODC offers one model for such an assessment and remediation plan. Under the [ICCWC Strategic Programme 2016-2020](#), ICCWC partners will also support the development and implementation of national wildlife anti-corruption programmes, including deployment of medium-term mentors. To ensure effective CITES implementation, the evidence in this paper indicates that CITES document abuse should be a central concern in this work.

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About Targeting Natural Resource Corruption

The Targeting Natural Resource Corruption (TNRC) project is working to improve biodiversity outcomes by helping practitioners to address the threats posed by corruption to wildlife, fisheries and forests. TNRC harnesses existing knowledge, generates new evidence, and supports innovative policy and practice for more effective anti-corruption programming. Learn more at tnrcproject.org.

Disclaimer

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