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# Message from the head of the UKFIU



## Vince O'Brien Deputy Director

Hello and welcome to the 25<sup>th</sup> issue of the UKFIU's magazine *SARs in Action*.

We are pleased to release this issue alongside two episodes of the UKFIU podcast to coincide with World Wildlife Day on the 3rd of March.

Wildlife crime is considered to be the fourth largest crime type after people trafficking, drugs and firearms. As outlined in an article by the UKFIU International team, wildlife traffickers exploit weaknesses in the financial and non-financial sectors to launder the proceeds of this crime.

International cooperation is crucial in the fight against wildlife crime and the UKFIU regularly collaborate with global financial intelligence units (FIUs) to share best practice. We hear from the Canadian FIU's Deputy Director of Intelligence who explains about a public-private partnership initiative aimed at improving awareness and understanding of this threat and targeting the laundering of proceeds of this crime.

We also hear from two units playing a key role within the UK. The National Wildlife Crime Unit reveals the most trafficked species in the world and the Metropolitan Police Service's Wildlife Crime Unit share some case studies. Two analysts from TRAFFIC comment on how the UK's regulated financial sector can recognise and report on illicit financial flows, signposting to red flag indicators for reporters that have been shared by TRAFFIC and the Canadian and U.S. FIUs.

We hope you enjoy this issue and podcast episodes on this topic, available on most streaming sites.

## ➔ Who is the magazine aimed at?

- All law enforcement; this includes senior investigating officers, frontline police officers and police staff
- Reporters
- Regulators
- Supervisors
- Trade bodies
- Government partners
- International partners

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➔ Opinions expressed in articles provided by partners are not necessarily the view of the UKFIU/NCA. The UKFIU exercises the right to edit submitted articles.

# UK NATIONAL WILDLIFE CRIME UNIT

**Chief Inspector Kevin Kelly**  
**Head of the UK National Wildlife Crime Unit (NWCU)**  
**Chair of the Interpol Wildlife Crime Working Group**



Let me ask you a question.



**What is the most trafficked animal in the world?**

I can guess your answers to the question, because when we imagine illegal wildlife trade (IWT) in the whole we often think about elephant tusk, rhino horn, pangolin scales, reptiles and big cats being trafficked.

What if I was to tell you the most trafficked species in the world is the **European eel**, with over 330 million being trafficked illegally each year. So if you're looking for SARs on pangolins and ivory in the UK, you're probably wasting your time. Let me explain.



A lot has changed in the world of the illegal wildlife trade since our last article in [issue 13 of SARs in Action](#) published in November 2021. In 2022 the NWCU commenced a project which involved a UK assessment to identify the true scale of IWT, and ultimately answer the question - what is IWT?

It should be no surprise that the global illegal wildlife trade is the fourth largest crime type after people trafficking, drugs and firearms, generating £17 billion annually in illicit finances.

When we began our IWT assessment we looked at incidents, intelligence and seizure data. We overlaid this with European and international assessments and typologies. This gave us our six themed areas that comprised our IWT priorities, which we then scored following the standards of [Management of Risk in Law Enforcement \(MoRiLE\)](#). The high risk areas are illegal trade in: glass eels, wild peregrine falcons, reptiles and parrots. The low risk areas are trade in: ivory, timber, beauty and medicines.



The NWCU focuses on the high risk areas. When we look at the illegal trade in European eels, this is a product that is consumed for its meat, with a significant amount of it going to China. The illicit European eel trade alone is **worth £2.5 billion annually**. Tiny eels are trafficked out of Europe into specialist facilities that intensively grow them on to adult size, where they're harvested for their meat. In the wild it takes an eel between 10 and 15 years to reach a size to harvest, but applying intensive feeding techniques brings them to adulthood within 10-12 months. So you can see the economics in this crime. Also eels cannot be bred in captivity, so they have to be fished and trafficked – no one knows why, not even scientists.



The UK is also home to some of the rarest birds of prey in the world, and our native peregrine falcon is a desired asset in the Middle East. The need for wild birds is because of their native instincts. They are faster, stronger and their survival genes gives them a killer instinct that you cannot teach or train. IWT within the UK is low risk high reward. A criminal who will abseil a cliff and raid a nest to remove the chicks will get upwards of £7,000 in cash per bird, and when the criminals get caught they know they won't go to prison for a long time. This is very different to the drugs world.

What we have found in relation to the mechanics of the crime is that the commodity is linked to unlimited top end money and the criminal networks thrive on this. NWCU identified one bird had sold in Dubai for £320,000. So again you can see the economics of the criminal network. We have seen a number of cases in court this year already.

## CASE STUDY



**Operation Tantallon (a multi-agency investigation into the theft and laundering of wild peregrines) revealed how £21 million of undisclosed revenue from this trade was identified. Criminals underdeclared the value of birds at the point of trade, or with customs, to avoid detection at the borders, and also scaled down values within financial transactions to reduce the likelihood of a SAR.**



So I guess that leads me to my point in chief... how do we find IWT SARs? Well, what we can say with confidence is that almost all of UK IWT is hidden and concealed in legal, lawful and licensed activities. So utilising traditional methods will not help us here. We have to look further into the crime types and themed areas. We also have to look at those who pass themselves off as legitimate businesses, as the criminality is hidden within. If I receive a SAR that a peregrine falcon has traded hands for £20,000, I expect that. We will still look at the subject and the details. But I want to know about those transactions that are overly inflated, or in turn dramatically deflated as it's the mis-declarations that amount to the £21 million that HMRC are interested in.

So I'll finish by noting that the coordinated fight against IWT is still in its infancy. We have done a lot, but the hard work is still ahead of us. We are committed to continuing to raise awareness of IWT across law enforcement and doing this with the UKFIU, continuing to work together. Wildlife crime and IWT is a difficult one for law enforcement, especially around financial investigations and resourcing them as there is much more threat and risk in other areas of policing that need the resourcing. But by continuing to raise the profile of this area of policing we will show how tackling wildlife crime helps tackle serious and organised crime.

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# EGMONT WORKING & REGIONAL GROUP MEETINGS

Delegates from the UK Financial Intelligence Unit (UKFIU) attended the 24th Annual Egmont Working and Regional Group Meetings in Malta between 29 January and 2 February 2024.



The UK is a founding member of the Egmont Group of Financial Intelligence Units (Egmont Group), established in 1995. The Egmont Group works to enhance member capabilities and to improve secure information sharing, training, and best practice internationally. The UKFIU's International Team plays a vital role in sharing intelligence on illicit finance and the funding of terrorism effectively with international partners. The team also receives a high volume of enquiries from overseas jurisdictions wanting to identify or trace assets held in the UK.

The working and regional group meetings offer a platform for the UKFIU to strengthen working relationships, collaborate further and share expertise to work towards combatting money laundering and terrorist financing internationally.

With over 500 representatives of Egmont FIUs, international partners and observers attending the meetings, the visit to Malta presented an invaluable opportunity to meet with counterparts from across the world and to build relationships critical to operational success.



**Head of the Ukrainian FIU, Igor Gaievskyi and Head of the UKFIU, Vince O'Brien**

Delegates attended a number of meetings throughout the week to discuss priority issues, ranging from effective global criminal asset denial and Egmont strategy and operational policy, to endorsing new FIU candidate members to the Egmont Group, highlighting the value of public-private partnerships.

During the week, the delegation shared insights gained from the UK's public-private partnership initiative with colleagues from neighbouring FIUs. This contributed to the current regional plan, part of which focuses on sharing good practice in this area.

Deputy Director Vince O'Brien attended a meeting with other heads of participating FIUs to discuss future technology developments for the Egmont Group to enhance and facilitate information sharing. This discussion is central to ensuring the capability of all member FIUs to securely share operational information.



Appointments to several leadership positions within the Egmont Group were made during the week, with Vince O'Brien appointed as Vice Chair of the Membership, Support and Compliance Working Group, and Malcolm Duckett, SARs Programme Delivery Lead, appointed to the Egmont Secure Web Board. This commitment at a senior level underlines the importance that the UKFIU places on supporting the work of the Egmont Group.



Vince O'Brien and Malcolm Duckett

The busy schedule unfortunately did not allow for much opportunity for sightseeing in beautiful Malta. However, the Maltese FIU hosts did arrange for a wonderful evening tour of the St. Johns Co-Cathedral, which was truly breathtaking.



UKFIU delegates left the Egmont Group meetings with plenty of actions and lots to consider. We look forward to continuing our engagement with our global counterpart FIUs at the Egmont Group summer Plenary in Paris in June 2024.

# PROJECT ANTON:

## AN INTERNATIONAL PARTNERSHIP COMBATTING THE LAUNDERING OF PROCEEDS FROM ILLEGAL WILDLIFE TRADE

**Barry MacKillop**  
**Deputy Director, Intelligence**  
**FINTRAC**



Financial Transactions and  
Reports Analysis Centre  
of Canada

In January 2023, Canada's Financial Intelligence Unit, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), published an Operational Alert with money laundering indicators related to the illegal wildlife trade (IWT). This Operational Alert assists businesses in identifying and reporting financial transactions related to the laundering of the proceeds of crime from this appalling and cruel crime.

FINTRAC's Operational Alert marked the launch of Project Anton, a public-private partnership initiative led by Scotiabank and supported by FINTRAC, the Royal Foundation's United for Wildlife, and other key domestic and international partners aimed at improving awareness and understanding of the global threat posed by IWT, and targeting the laundering of proceeds from this crime.



**OPERATIONAL ALERT:**  
Laundering the proceeds  
of crime from

**ILLEGAL WILDLIFE TRADE**

In the last year, FINTRAC and its partners at other FIUs, law enforcement, reporting entities, and non-governmental organisations have had several significant successes in growing awareness of IWT as a financial crime and generating an increased volume of actionable financial intelligence on the associated money laundering.



## Since the launch of Project Anton, FINTRAC has:

- Received over 50 suspicious transaction reports relevant to the laundering of the proceeds of the IWT since the publication of its Operational Alert. This compares to less than 200 suspicious transaction reports on this topic submitted to FINTRAC in the 10 years prior to the launch of Project Anton.
- Provided 40 disclosures of actionable financial intelligence on suspected money laundering associated to the IWT to domestic law enforcement and international counterparts since the launch of Project Anton.



- Developed a Project Anton Financial Intelligence Unit Toolkit which consolidates money laundering indicators, keywords in 21 languages, and relevant publications regarding the financial activity associated to IWT. This resource was developed with contributions from several Project Anton partners and is intended to support financial intelligence units around the world to quickly uplift their capacity for the detection of incoming transaction reports possibly linked to IWT; this has also proven to be a valuable tool for reporting entities and law enforcement agencies.
- In collaboration with Prince William's United for Wildlife, FINTRAC and six other financial intelligence units, including the UKFIU, publicly endorsed a [Statement of Principles](#) on the key role financial intelligence can play in combatting IWT. This Statement of Principles sets out meaningful actions financial intelligence units, and other relevant partners, can undertake to prevent, detect, and deter the financing of IWT. The Statement of Principles was announced by the Prince of Wales at United for Wildlife's Global Summit in Singapore in November 2023.

**“ These successes demonstrate clearly that when we focus on the financial aspect of the illegal wildlife trade, we can achieve meaningful steps towards the prevention, detection, and deterrence of the financial activity that fuels this heinous crime. ”**

# TACKLING ILLEGAL WILDLIFE CRIME

**Ben Brock - Senior Wildlife Crime Analyst**

**Fred Ellis - Wildlife Trade Analyst & Financial Specialist**

**TRAFFIC**<sup>®</sup>

Interpol, United Nations Office on Drugs and Crime and Financial Action Task Force recognise wildlife crime as a major transnational organised crime, which generates billions of criminal proceeds each year. These crimes are frequently enabled by corruption, cause harm to populations by fueling environmental degradation and worsen the threats from climate change.

TRAFFIC is a non-profit government organisation with close relationships with both global law enforcement and the financial sector. We have an international network of nearly 200 experts on the ground in Africa, Asia, Pacific, Europe, and the Americas. As a global trusted advisor, we generate evidence, analysis, and solutions to strengthen global and national policy frameworks, and build responsible and fair supply chains.



TRAFFIC does not conduct investigations of illegal wild species trade or the recovery of criminal assets generated from these crimes. Instead, TRAFFIC provides expert training, analysis and technological tools that support and assist national and international agencies to better identify, investigate and prosecute wild species criminals.

## SARs and Illegal Wildlife Trade

The use of SARs as an intelligence and investigation tool is **severely underutilised** in the detection and recovery of criminal assets deriving from wild species crime – the **fourth largest crime type by value**. As a global financial hub, the UK's regulated financial sector and the UKFIU have a unique opportunity to recognise and report the illicit financial flows that enable and motivate the destruction of our natural world.

Primary risk indicators are numerous, varied and region/industry-specific, but some useful suspicious activity indicators have been shared by [FINTRAC](#) and [FinCEN](#).

These can include:

- 🚩 Clients and businesses operating in high-risk jurisdictions for wild species trade or logistics
- 🚩 Overt or covert references to wild species types, trafficking roles, specialised equipment or trafficking facilitators such as freight companies or open-source information

However, the nuance is not always clear-cut and generally area-specific.

Almost all countries contain the risk for illegal exploitation of wild species, from the South Americas for deforestation, Europe for glass eels, sub-Saharan Africa for rhino horns and ivory to Asia for tigers and pangolins as generalised examples each with their own unique red flags and typologies that could be identified through suspicious transactions. Live eels use different transport equipment and common trade routes that will differ from concealed ivory or large quantities of protected timber. For more information on red flags and typologies, please refer to TRAFFIC's [website](#), or contact [fred.ellis@traffic.org](mailto:fred.ellis@traffic.org) and [ben.brock@traffic.org](mailto:ben.brock@traffic.org) if you have any queries.



## Financial Sector Intervention

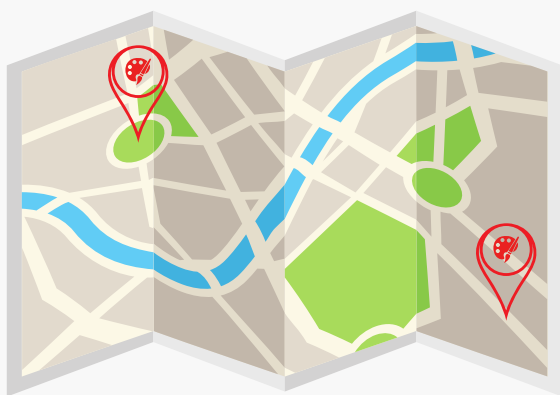
The rate of exploitation of natural resources and wild species is increasing as demand, consumption, and globalisation continue to grow. This leads to unsustainable extraction practices, concentration of illicit profits in the hands of the few at the expense of a country's biodiversity and taking necessary and legal tax funds from the state and society who would otherwise benefit from its re-investment. The global timber trade is thought to be valued at USD 330 billion each year. Interpol (2019) has estimated that 15-30% of that is considered illegal, which amounts to between USD 50 – 99 billion in illicit profits being generated; much of which could pass through the UK system.

Wild species crime, including illegal timber harvesting, illegal, unreported and unregulated (IUU) fishing and polluting, is the fourth largest crime type behind the trafficking of drugs, weapons and people. However, it receives a considerably lower proportion of law enforcement and private sector focus, attention and resources. Because of this, the illegal wild species trade remains a low-risk yet high-reward criminal enterprise. Through careful assessment of transactions from high-risk clients, the reporting sector plays a crucial role in removing the benefits of this crime and threatens to expose large active networks. TRAFFIC's role is to aid in those careful assessments.

# AMBER ALERT:

## FINANCIAL SANCTIONS EVASION, MONEY LAUNDERING & CULTURAL PROPERTY TRAFFICKING THROUGH THE ART STORAGE SECTOR

The NECC Amber Alert on [Financial Sanctions Evasion, Money Laundering & Cultural Property Trafficking Through the Art Storage Sector](#) (the Alert) was issued in January 2024 by the NCA, a member of the NECC, HM Treasury's Office of Financial Sanctions Implementation (OFSI) and HM Revenue & Customs (HMRC), working in conjunction with UK law enforcement and financial sector partners as part of the Joint Money Laundering Intelligence Taskforce (JMLIT).

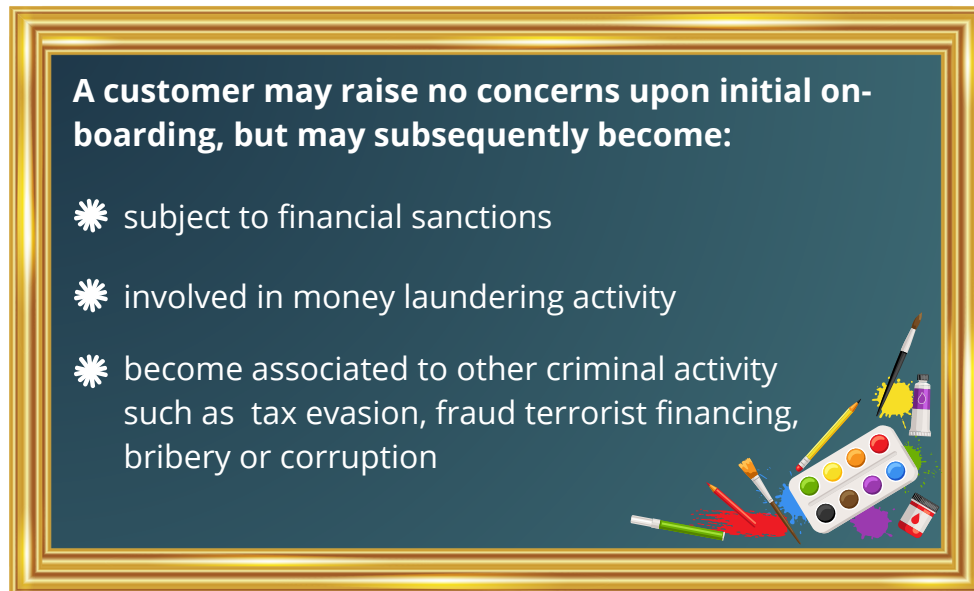


The Alert highlights the sanctions evasion and money laundering risks presented to UK industries linked to the art storage sector, and serves as a reminder on due diligence checks and reporting obligations. The focus is on UK artwork storage facilities (including warehouses, auction houses, galleries and freeports), the UK specialist service providers that are linked to the art storage sector (including shipping and transport companies, insurance companies and accountancy firms), and the clients that utilise these art storage facilities.

High-net-worth individuals (HNWIs) are known to keep artworks in specialist storage facilities, some of which are tax free. As the price of art has increased, contemporary collecting has grown, with owners more interested in seeing their artwork investment portfolios appreciate in value. This trend is not exclusively linked to HNWI buyers, but it is prompting concerns about the use of these storage facilities for illegal activities by criminals seeking a capital asset that can be safely stored, that appreciates in value over time, and that can be liquidated if and when required.

**Clients of UK artwork storage facilities and/or their linked specialist service providers may be UK residents or located overseas, including in high-risk jurisdictions such as Russia. Many elites and other HNWIs possess considerable artwork assets which are held either within properties or in storage facilities. Non-HNWI clients may also utilise storage facilities to circumvent financial and other restrictions. Furthermore, any client may be represented by a third party such as a law firm, a brokerage firm, or a Trust and Company Service Provider (TCSP), further obfuscating the true source of funds and provenance of artworks.**

The Alert highlights that criminals are finding ways to utilise the art market to conduct illicit activity. Art market participants (AMPs)<sup>1</sup> should have the ability to identify within their business any change in client status or suspicious activity relating to financial sanctions evasion, money laundering, cultural property trafficking, or other criminality. Thorough due diligence checks conducted at regular intervals will assist in ascertaining any change to a client's circumstances. Any resultant concerns identified can then be reported by the AMP through the appropriate channels, thereby ensuring the AMP is fulfilling their reporting obligations and thus avoiding any potential criminal offences such as sanctions breaches, court restrictions breaches or storing prohibited property, which may also lead to the voiding of insurance cover.



Failure to undertake regular and appropriate due diligence is considered to be a red flag for complicity and may indicate an attempt to circumvent regulations. Breaches of financial sanctions, such as dealing with frozen assets or funds involving a Designated Person (DP), are criminal offences and applicable to the DP as well as to any associates or enablers. Registered businesses who fail to comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs) may be subject to civil penalties and/or criminal prosecutions.

Criminals are exploiting the assumption made by many AMPs in the art storage sector that someone else has taken responsibility for conducting due diligence and for maintaining accurate and up-to-date customer profiles. Inadequate and/or irregular Know Your Customer research opens the door for criminals and their professional enablers to circumvent legislation and regulations, putting both the company and the UK at risk. Criminals are known to test organisations' due diligence processes by conducting legitimate business activity, and then placing illicit items and/or requesting sudden service changes, thereby concealing and moving assets that may be subject to restrictions.

<sup>1</sup> An art market participant is defined as a firm or sole practitioner who: (i) by way of business trades in, or acts as an intermediary in the sale or purchase of, works of art and the value of the transaction, or a series of linked transactions, amounts to €10,000 or more; or (ii) is the operator of a freeport that by way of business stores works of art and the value of the works of art stored amounts to €10,000 or more – British Art Market Federation, '[Guidance on Anti Money Laundering For UK Art Market Participants](#)', amended 6 February 2023, pg. 8

# METROPOLITAN POLICE SERVICE

## WILDLIFE CRIME UNIT

The Metropolitan Police Service (MPS) Wildlife Crime Unit (WCU) is responsible for the enforcement of wildlife laws and the implementation of initiatives to prevent wildlife crime in London. The unit was set up in 2001 and it continues to lead wildlife crime investigations and provide specialist support and assistance to police officers all over the city.



The WCU team deals with complex wildlife crime investigations i.e. presence of a significant financial element linked to the possession of a substantial amount of Convention on International Trade on Endangered Species (CITES) protected items. Volunteer Borough Wildlife Crime Officers (BWCO) support the work of the unit and progress local wildlife crime investigations reported in their boroughs.

Global wildlife trafficking is estimated to be worth up to £17 billion per year, which puts it amongst the top four organised criminal activities alongside arms, drugs and human trafficking. It has increasingly become a major area of activity for serious organised crime groups and therefore it is linked to other serious criminal activities. The magnitude of wildlife trafficking has a serious environmental impact that is pushing protected species closer to extinction.



The WCU has formed valuable partnerships with a long list of agencies – both government and non-government - in Britain and internationally, to work collaboratively and increase the efforts to reduce wildlife crime and the demand for endangered species and their products.

London is a hotspot for the illegal transit, import and export of wildlife products. In 2023 UK Border Force intercepted and seized a total of 150 CITES listed items that arrived at UK ports enroute to London addresses without the required permits or certificates. Animal derivatives from alligator, crocodile or python and plants such as cacti or agarwood were amongst the most recurring seized species.



As well as working with UK Border Force, the WCU actively conduct open source research to identify any illegal activity that may include the trade on endangered species. The following CITES listed items were seized by the WCU in 2022 and 2023:

### 2022 CITES Seizures

CITES species	Count of species
Bear	1
Cheetah	1
Crocodile	1
Elephant ivory	779
Leopard	1
Sawfish	1
Snow leopard	1
Tiger	1
Turtle	1
Walrus	1
Zebra	1
<b>Total</b>	<b>788</b>



### 2023 CITES Seizures

CITES species	Count of species
Agarwood	2
Butterfly	1
Cobra	2
Conch	2
Coral	1
Crocodile	7
Elephant ivory	6
Euphorbiaceae	1
Ginseng	17
Hippopotamus	1
Musk deer	7
Owl	2
Sawfish	2
Tortoise	3
<b>Total</b>	<b>54</b>

**Note: The seizures recorded are the total amount of units seized, not the cases investigated. The result of an investigation can be 1 unit seized (i.e. elephant ivory) or 100 units.**

The trade in the above species can be legal if the right CITES permit or certificate has been issued by the competent authority. However, due to the demand for these species / products in consumer countries and the highly lucrative profit made from them, they are also illegally traded, which results in a decline of their population and ultimately, in the loss of biodiversity and the destruction of ecosystems.

The illegal wildlife trade connection to larger crime, such as money laundering or terrorist financing, contributes to the establishment of black markets and illegal economies.

Nonetheless, the investigation into organised crime networks trafficking with endangered species still proves challenging. As established in The United Nations Office on Drugs and Crime (UNODC) World Wildlife Crime report 2020, wildlife criminal cases very often start and end with the seizure, with limited investigation into the wider criminal network beyond the poacher or courier. There are major gaps in the understanding of the financial flows behind wildlife crime. Little is known about the profits made by organised crime groups from illicit wildlife trafficking and the significant gaps in understanding supply and demand for certain wildlife products make such estimates challenging.

In the past few years, the WCU have investigated and successfully prosecuted offenders who were illegally trading with CITES listed endangered species. Three of these investigations are highlighted below, which have a substantial financial element present.

A man from Lambeth (the defendant) was convicted of **illegally importing and selling endangered primate skulls**; he imported a variety of skulls such as

chimpanzee, drill, guenon, mangabeys, macaques and colbus. He also imported



derivatives from other endangered species such as crocodiles, elephant, Asian black bear and whales. The defendant had offered items for sale and sold items without the necessary certificate or import permits, which are required for the trade to be legal.



The items were examined by a government appointed wildlife inspector who concluded that many of the primate specimens originated from west or central Africa and were taken from the wild. This was of particular concern in relation to drills, which are a critically endangered species.

The defendant was found guilty of four counts of selling/keeping specimens for sale contrary to the Control of Trade in Endangered Species Regulations. The specimens included endangered primate skulls, leopard skulls, and bear skulls as well as a dwarf crocodile skull. He was sentenced to a total of 26 months imprisonment, suspended for 18 months and was also ordered to complete 120 hours of unpaid work and pay court costs of £4000.

A multimillionaire heiress was spared jail after **admitting smuggling fashion accessories made from the skin of endangered pythons** into the UK.

The heiress was sentenced to a 160-hour community order after she pleaded guilty to two counts of importing goods with the intent to evade a prohibition.



The heiress was also charged with two counts of keeping for sale a species acquired unlawfully, and two counts of selling a species unlawfully imported, at an earlier hearing.

During the trial the court heard the defendant imported baseball caps and travel bags worth more than £17,000 from Indonesia.



A market trader was jailed after **rhino horns, elephant tusks and hippo teeth worth up to £2m** were discovered by specially trained search dogs in a police raid. The market trader was arrested when officers from the WCU searched his home.

The market trader had been illegally trying to sell them for “cash only” on Instagram at £60,000 per kilogram, which could have made him up to £2m. He was jailed for 14 months after being convicted of six wildlife offences involving the illegal purchase of endangered animal parts, and keeping or offering them for sale. POCA confiscation was conducted for assets with a value of £100,642.55. The market trader had 6 months to satisfy the order, or go back to prison for 3 years, currently accruing interest on the debt daily. The total criminal benefit was agreed to be £961,777.78 which he will owe until he pays it back.

Convictions such as the ones mentioned above, in addition to awareness raising campaigns and proactive research to find illegal wildlife products linked to London, have resulted in preventing the open to view trade in illegal wildlife products and the profit made from it. Whilst in the past shops would be openly selling CITES listed items (i.e. Traditional Chinese Medicine with images and writing indicating that items had rhino horn, tiger bone and any other restricted items), in the last few years criminals have started to hide or disguise any banned wildlife product to avoid being identified by police.



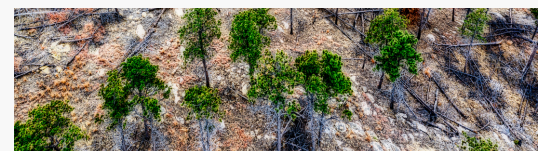
Whilst changes in legislation and an increase in dedicated resources are necessary to see substantial improvements in the fight to tackle wildlife crime, convictions such as these are vital to highlight IWT in London and to continue the battle to protect many endangered species, which would have reduced chances of survival without law enforcement actions.

Updates in legislation such as the Control of Trade in Endangered Species Regulations 2018, The Conservation of Habitats and Species Regulations 2017 and the Ivory Act 2018 have contributed to increasing the protection of biodiversity through the conservation of natural habitats and species of wild fauna and flora, and reinforce the regulations on trade in endangered species.

Ultimately, every species in the ecosystem plays a role in maintaining nature's order and any that becomes extinct will contribute further to the disturbance and destruction of the environment.

# UKFIU INTERNATIONAL

Since November 2022, the UKFIU International Team have been a key partner in Project Anton, a public-private partnership (PPP) initiative led by Scotiabank and supported by Financial Transactions and Report Analysis Centre of Canada (FINTRAC), The Royal Foundation's United for Wildlife and several other international organisations. The PPP aims to combat the illegal wildlife trade (IWT) by improving the detection of financial indicators of wildlife trafficking and increase reporting of this topic in suspicious activity reports.



As described by the Financial Action Task Force (FATF), IWT is transnational in nature, generating billions in criminal proceeds each year. This criminal activity fuels corruption, threatens biodiversity, damages fragile ecosystems, bolsters illicit trade routes, and can have a significant negative impact on public health and the economy. To move, hide and launder their proceeds, wildlife traffickers exploit weaknesses in the financial and non-financial sectors, enabling further wildlife crimes and damaging financial integrity.



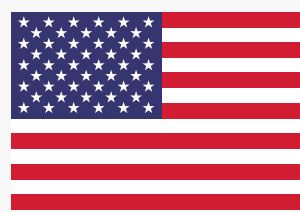
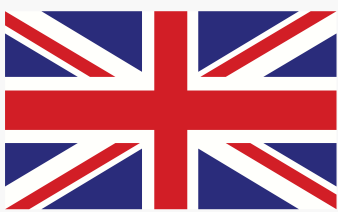
Given these factors, it is critical that collaboration occurs on a global basis to combat this abhorrent crime. To tackle this criminality, the UKFIU have participated in regular meetings with FINTRAC and FIUs of Australia, New Zealand, South Africa, Singapore, the Netherlands and the United States to share best practice, identify key targets, and discuss trends/typologies observed. This has only been possible from the UK side with the assistance and expertise in the [National Wildlife Crime Unit \(NWCU\)](#), a stand-alone police unit to support IWT investigations.

Since joining the PPP, the UKFIU International team have implemented a triage process which enables officers to identify, prioritise and disseminate intelligence related to IWT with domestic law enforcement agencies, including the NWCU and our international partners. This intelligence is crucial to enable our partners to progress operational and intelligence development activity.

“ This intelligence is crucial to enable our partners to progress operational and intelligence development activity. ”



In November 2023, the UKFIU made a commitment, alongside our partner FIUs in Australia, Canada, New Zealand, South Africa, Singapore, and the United States to combat the IWT and signed a [Statement of Principles for a Multilateral Approach to Combatting Illegal Wildlife Trade](#). The UKFIU will continue to build strong relationships with our international counterparts to prevent, detect and disrupt the financial activity associated to IWT.



# THE FINANCIAL INTELLIGENCE PODCAST

## IMPACTS OF THE ILLEGAL WILDLIFE TRADE

Listen to the UKFIU's Financial Intelligence podcast for a two-part special on the Illegal Wildlife Trade (IWT), featuring guest speakers Barry MacKillop, Deputy Director of Intelligence, from Canada's Financial Transactions and Reporting Analysis Centre (FINTRAC), and Investigative Support Officer, Ian Guildford, from the National Wildlife Crime Unit (NWCU).

In the episodes, we discuss the great work of FINTRAC's Project Anton, which is an innovative, international, public-private partnership, launched to address the issues of international criminal organisations and the cross-criminality linked to wildlife crime.

The project is named after the world renowned conservationist Anton Mzimba, who was head of ranger services at the Timbavati private game reserve in South Africa and was shot and killed in July 2022 in his fight against the horrors of the illegal wildlife trade.

We also discuss how the UK is a source, consumer and transit country. Two high risk threats to the UK as a source country are birds of prey and glass eels. Wild peregrine falcons can fly faster than those which are bred in captivity and therefore bring high money from the wild into the captive market of the Middle East, and the glass eel trade is a multi-million pound industry in the Asian market.

There is no wildlife trade without corruption, and the corruption which accompanies IWT has a significant impact on the stability of countries and world trade generally. Both Barry and Ian talk about the impact on legitimate businesses, local economies as well as the biodiversity and ecotourism industries. Rounding up the discussion, Barry and Ian raise the importance of international cooperation in tackling this global crime.

Part 1 (Episode 17) and Part 2 (Episode 18) are available now and can be found on Spotify, Audible, Amazon Music and most streaming sites.



# THE UKFIU IS HIRING!



The Digital Media and Publications (DMP) team sits within the UKFIU's wider engagement function, which engages with a range of external stakeholders including the regulated sector, law enforcement agencies, other enforcement agencies, other government departments and the general public.

The Communications Manager role within DMP is varied and fast-paced, comprising day-to-day managerial responsibilities and engagement forward planning based on strategic thinking and data analysis. The ability to see the bigger picture is important and there are often a number of moving parts in play at any one time.



As can be expected in such a role, communication across a range of grades and with the wide variety of stakeholders that DMP works across is an integral part of daily duties. The Communications Manager is responsible, among other duties, for the ideation and implementation of campaigns across a range of communications channels, the growth of the UKFIU's social media presence, internal reporting, and maintenance of policies and processes.

## ***Could the next UKFIU Communications Manager be you?***

This role will be recruiting very soon - follow the UKFIU on [LinkedIn](#) and [X](#) to be the first to know when applications for this role, and others, are open.

# SIA

## SARs IN ACTION

You can download previous copies of the SARs IN ACTION magazine from the National Crime Agency's website [www.nca.gov.uk](http://www.nca.gov.uk)



# UKFIU

UK Financial Intelligence Unit



# Episode 17

AVAILABLE HERE



## THE UKFIU PODCAST

Educational podcast series discussing areas of interest related to the SARs regime and economic crime.



Our podcasts can be found on Spotify, Audible, Amazon Music and most streaming sites.



Updates can also be found on our LinkedIn page and on X (formerly Twitter) at [NCA\\_UKFIU](https://twitter.com/NCA_UKFIU).

