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Strengthening Financial Investigation of Wildlife Crime in Central Africa

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Executive Summary

When industrial-scale flows of illegal wildlife trade (IWT) departing the African continent started to shift westwards a decade ago, RUSI's Environmental Crime Programme began to explore the role that countries in West and Central Africa played in the sourcing and transit of protected species of flora and fauna, and assessed national capacities to tackle related illicit financial flows (IFFs).

An initial study conducted by RUSI in 2021 assessed West African jurisdictions, finding low awareness of the links between IWT and money laundering (ML) and an absence of routine parallel financial investigations across the region. Building on that study, this paper provides the first regional assessment of the awareness of wildlife-related IFFs across Cameroon, the Central African Republic, Chad, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon, and their respective capacities to conduct parallel financial investigations. The research featured direct access to officials and experts – rare for this region – making this paper an important addition to the discourse.

This study found that levels of of IWT-related ML/terrorist financing (TF) risk awareness were high in Central Africa; yet, wildlife-related financial investigations were largely absent. This is also now common in other regions. However, the reasons for such disjointedness are under-explored. Based on follow-up interviews with financial intelligence unit (FIU) analysts, enforcement actors, ministerial officials and civil society, this paper identifies factors obstructing the operationalisation of wildlife-related financial investigation, including the prevailing enforcement focus on arresting offenders only when caught in the act of wrongdoing – known in the legal vernacular as *in flagrante delicto* – as well as the lack of capacity and resources. Additionally, this paper considers the influence of corruption and patronage in disincentivising financial investigations, and looks at links to political and business elites – the hidden enablers of wildlife trafficking.

This paper argues that structural and political barriers inhibit the financial investigation of IWT, preventing the incisive targeting of middle- and high-level actors, hindering avenues for prosecution and resulting in an entrenchment of criminal networks. Without 'following the money', wildlife crime enforcement efforts in Central Africa are likely to remain disproportionately and inequitably focused on offenders involved in harvesting offences. This approach is inefficient, considering the replaceability within IWT supply chains of low-level offenders who are targeted by enforcement agencies, and the lack of deterrent for higher-level offenders – the organised crime actors and corrupt facilitators – who are not replaceable.

Key Findings

- Awareness of the financial dimensions of IWT is high: of the seven countries surveyed, six recognised IWT as a predicate offence to ML, but all had incorporated it into national risk assessments on ML/TF, and many had pursued legal reforms to strengthen wildlife crime penalties.
- Despite such recognition, financial investigations of IWT in Central Africa are seldom conducted: only two FIUs reported receiving one or more wildlife-related suspicious transaction reports or described instances of inter-agency cooperation on IWT-related financial investigations.
- Practitioners trying to mainstream financial investigations of IWT in Central Africa face various challenges, including legal and enforcement norms as well as corruption, leading the authors to prioritise a number of recommendations, summarised below.

Recommendations

- Focus the financial investigation of IWT on critical nodes, such as ports, to harness the abilities of high-capacity state agencies.
- Promote the creation of bespoke Standard Operating Procedures (SOPs) tailored for use on IWT-related financial investigations by relevant national enforcement agencies.
- Promote locally led, certified training on financial investigations for national investigative agencies.
- Integrate anti-corruption best practices into financial investigation training and SOPs design, to safeguard investigations and investigators.
- Strengthen the evidence base on IWT-related IFFs in Central African jurisdictions and build support for greater public–private cooperation.

Introduction

Central Africa holds immense importance in terms of natural resources, and the region plays a significant role in global carbon storage. However, this biodiversity stronghold faces diverse threats, including the illegal hunting and harvesting of flora and fauna.[1] These industrial-scale activities are driven by domestic, regional and international demand, making the region a significant hub for the illegal wildlife trade (IWT).

Demand for wild fauna species comes from a variety of quarters and sectors, including the ornaments industry, food, jewellery, medicine and as exotic pets and status symbols.[2] Elephant ivory, pangolin scales, live African grey parrots and chimpanzees have been among the most frequently seized fauna specimens and products in Central African countries in recent years.[3] Domestic and regional markets for illicit fauna species exist across Central Africa, including for bushmeat, pets and cultural or medicinal purposes,[4] but international demand drives the flow of higher-priced illicit wildlife. The chance of lucrative profits has led to organised crime groups (OCGs) connecting seemingly disparate poaching groups with international buyers by stockpiling illicit products at key transit points for export as large-scale consignments.[5]

Regarding flora, high-value tropical wood species such as African rosewood and mahogany are illegally logged in the Congo Basin and laundered into legal supply

1. Craig Leisher et al., 'Ranking the Direct Threats to Biodiversity in Sub-Saharan Africa', *Biodiversity and Conservation* (Vol. 31, 2022), pp. 1329–43.
2. Annika Mozer and Stefan Prost, 'An Introduction to Illegal Wildlife Trade and its Effects on Biodiversity and Society', *Forensic Science International: Animals and Environments* (Vol. 3, December 2023).
3. TRAFFIC, 'Wildlife Trade Portal', <www.wildlifetradeportal.org>, accessed 15 May 2025.
4. For bushmeat, see Constant Momballa Mbun and Bricette Sop Nguemwo, 'Species in Bushmeat Trade in Cameroon and the Republic of the Congo', TRAFFIC, January 2022, <https://www.traffic.org/publications/reports/species-in-bushmeat-trade-in-cameroon-and-the-republic-of-congo/>, accessed 20 May 2025; for pets, see Amy Woolloff et al., 'Cyber-Enabled Wildlife Trade in Central African Countries and Nigeria', TRAFFIC, July 2022, <https://www.traffic.org/publications/reports/cyber-enabled-wildlife-trade-in-central-african-countries-and-nigeria/>, accessed 20 May 2025; for bushmeat, cultural and medicinal purposes, see Kadiri Serge Bobo, Fodjou Florence Mariam Aghomo and Bonito Chia Ntumwel, 'Wildlife Use and the Role of Taboos in the Conservation of Wildlife Around the Nkwende Hills Forest Reserve, Southwest Cameroon', *Journal of Ethnobiology and Ethnomedicine* (Vol. 11, No. 2, January 2015); and for cultural purposes, see Vivienne L Williams et al., 'Pan-African Review of Cultural Uses of Carnivores', PLOS One (Vol. 20, No. 3, March 2025).
5. Samuel K Wasser et al., 'Combating Transnational Organized Crime by Linking Multiple Large Ivory Seizures to the Same Dealer', *Science Advances* (Vol. 4, No. 9, 2018).

chains to meet demand for construction, furniture and luxury goods, driving deforestation. Illicit timber flows therefore involve corrupt corporations and officials (who collude in licence and permit fraud), as well as political and business elites – often the hidden beneficial owners of these legitimate-acting companies. By evading taxes and conducting fraud, IWT actors deny Central African countries the opportunity to benefit from legal wildlife trade, or from the tourism economies which rely on the sustainable management of their natural heritage. As detailed in chapter one, jurisdictions in Central Africa are losing significant tax revenues from the illicit timber trade alone.

In recent years, a strong international consensus has emerged around the necessity of targeting the financial beneficiaries and illicit flows of IWT to effectively disrupt large-scale criminal actors.[6] In 2020, the Financial Action Task Force (FATF), the global standard-setting body for anti-money laundering (AML) regimes worldwide, acknowledged the seriousness of IWT as a predicate offence for money laundering (ML), noting the limited efforts of countries in addressing the financial aspect of IWT in criminal investigations to date.[7] The FATF urged 'high-level political commitment' of member jurisdictions to 'strengthen their ML risk understanding' related to these crimes and improve their responses through 'enhanced operational coordination' between financial intelligence units (FIUs) and law enforcement agencies.[8]

Jurisdictions held to have significant deficiencies are added to the FATF's 'grey list', and are subjected to enhanced monitoring against an agreed timeframe.[9] Grey-list status leads to reduced confidence in foreign trade and investment, with real-world economic and reputational consequences.[10] Across the Central Africa region, the Democratic Republic of Congo (DRC) entered the grey list in October 2022, and Cameroon was added in June 2023. Both countries remain on the grey list at the time of writing. Failure to sufficiently address deficiencies can lead to further relegation to the FATF's 'black list',[11] guaranteeing pariah status internationally.

Thus, strong incentives exist to lead countries to address wildlife-related ML risks, yet the extent to which parallel financial investigations have been operationalised in counter-IWT interventions remains limited, as does the understanding of wildlife-related illicit financial flows (IFFs) and associated typologies. This paper explores the

6. For example, see UN Office on Drugs and Crime (UNODC), *World Wildlife Crime Report 2024* (Vienna: United Nations, 2024), p. 4.
7. Financial Action Task Force (FATF), 'Money Laundering and the Illegal Wildlife Trade', June 2020, <https://www.fatf-gafi.org/en/publications/Environmentalcrime/Money-laundering-wildlife-trade.html>, accessed 23 May 2025.
8. FATF, 'Money Laundering and the Illegal Wildlife Trade', p. 57.
9. FATF, '"Black and Grey" Lists', <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>, accessed 6 June 2025.
10. Jonah Anderson et al., 'The Economic Impact of FATF Grey Listing', White & Case, 30 October 2023, <https://www.whitecase.com/insight-alert/economic-impact-fatf-grey-listing>, accessed 10 October 2024.
11. FATF, '"Black and Grey" Lists'.

modalities of illicit finance linked to the illegal fauna and flora trade in Central Africa, and assesses to what extent the region has been able to adopt and leverage financial investigations to strengthen the threat response. Chapter One outlines existing evidence on IWT and related IFFs in Central Africa, for both flora and fauna species, including two in-depth case studies. Chapter Two presents and discusses the findings of the survey of regional FIUs and expert interviews. Chapter Three explores the barriers and challenges faced by practitioners and argues that the current status quo drives inequities and inefficiencies. The paper concludes by proposing practical refinements and recommendations to help overcome constraints and enable more successful deterrence of large-scale wildlife trafficking across Central Africa.

Methodology

This paper presents novel primary and secondary research, including analysis of a 25-question survey created by RUSI and disseminated to the FIUs across all member states of the FATF-style regional body (FSRB), Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale (GABAC, Action Group against Money Laundering in Central Africa), in Central Africa in April 2024, including Cameroon, the Central African Republic (CAR), Chad, the DRC, Equatorial Guinea, Gabon and the Republic of Congo (the RoC). This approach adopted methodology first used in a RUSI paper in 2021[12] to survey members of Groupe Intergouvernemental d'Action Contre le Blanchiment d'Argent en Afrique de l'Ouest (GIABA, Inter-Governmental Action Group against Money Laundering in West Africa), the FSRB for West Africa.

In addition to the survey, the research team conducted a non-systematic literature review, including academic, government and grey literature in both English and French. Following this, researchers conducted semi-structured interviews with key stakeholders across Central Africa, including 40 regional experts, the majority of whom were current or former law enforcement and government officials. Interviews were held in person and online between June 2024 and April 2025 and snowballing strategies were used to populate the sample. All interviews were conducted under condition of anonymity to protect interviewees' identities.

The relatively long data-collection period allowed for a rich exploration of dynamic phenomena over time, enabled researchers to build trust with key informants and allowed for the inclusion in the literature review of the latest FATF Mutual Evaluation

12. Alexandria Reid and Mark Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa', *RUSI Occasional Papers* (April 2021), <https://www.rusi.org/explore-our-research/publications/occasional-papers/illegal-wildlife-trade-and-financial-investigations-west-africa>, accessed 6 June 2025.

Report (MER) for Equatorial Guinea, which was published between March and late April 2025.[13]

One unexpected limitation of this study was that only a proportion of questions were answered by all respondents. Since the research design relied on a regional comparison, the subsequent analysis focused on topics where comprehensive answers had been offered. This approach has maximised the relevancy of findings, but has limited the potential to draw insights on topics where responses were only partially received.

Preliminary research findings were validated with FIU leadership during GABAC's 21st Plenary meeting in September 2024, through presentations of analysis and facilitation of dialogue with national representatives, who then provided feedback on results.

Terminology and Scope

In this paper, 'wildlife crime' is defined as 'the taking, trading (supplying, selling or trafficking), importing, exporting, processing, possessing, obtaining and/or consuming of wild fauna and flora, including timber and other forest products, in contravention of national or international law'.[14] This is the definition used by both the International Consortium on Combating Wildlife Crime and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

This notion of wildlife crime overlaps with IWT, a type of wildlife crime that encompasses actions such as smuggling, illegal trading or trafficking of flora and fauna, including their parts and products, for financial gain. In this paper, 'wildlife crime' denotes the broader typology, whereas 'IWT' is used to refer specifically to large-scale, financially motivated wildlife crimes involving organised crime or conflict actors, and their corrupt facilitators.

Although IWT can involve marine wildlife, this paper focuses only on the response to IFFs linked to the exploitation of flora or fauna species.

13. Equatorial Guinea, 'Mutual Evaluation Report', Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale (GABAC), November 2024, <https://gabac.org/wp-content/uploads/2025/03/MER_EQG_Eng.-Final.pdf> accessed 6 June 2025.
14. International Consortium on Combating Wildlife Crime, 'Our Focus: Wildlife and Forest Crime', <https://iccwc-wildlifecrime.org/our-focus-wildlife-and-forest-crime>, accessed 4 August 2025.

Illegal Wildlife Trade and Illicit Financial Flows

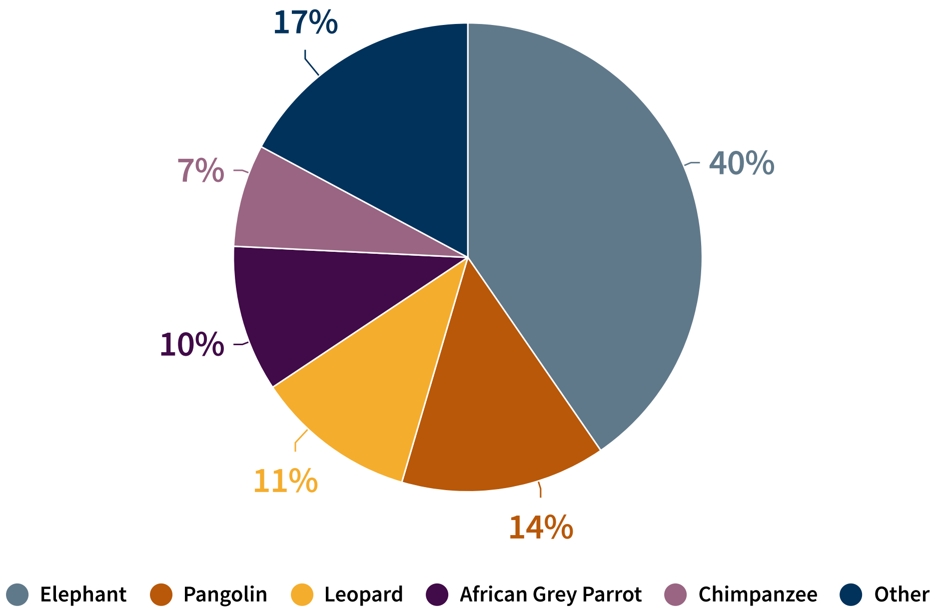
This chapter summarises regional IWT trends, outlining the scale and nature of the trade. It considers the diverse types of offenders and explores their methods, including what is known about IWT-related IFFs and potential links to conflict actors.

Trends: Fauna

Central Africa is an important source of illegal fauna products trafficked to international markets, including elephant ivory and pangolin scales.[15] Ivory poaching continued to dominate fauna-based seizures by Central African countries between 2020 to 2024 (Figure 1).[16] Poaching was responsible for a nearly 50% decline in elephant populations in certain parts of the region between 2006 and 2016, and according to the trends derived from the Monitoring the Illegal Killing of Elephants (MIKE) database, elephant poaching increased by 23% across Central Africa from 2020 to 2023 (Figure 2).[17]

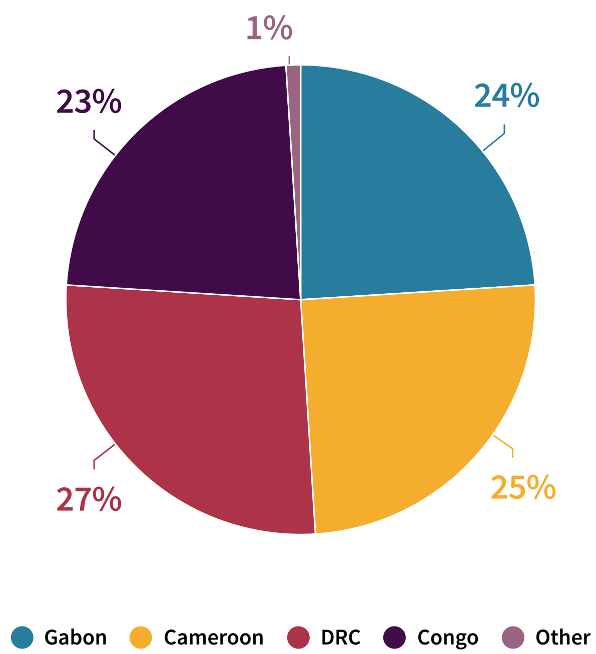
15. Oluwole Ojewale, 'Central Africa's Guardians of the Forest Slaughtered for Myths and Meat', *ENACT*, 24 April 2023, <https://enactafrica.org/enact-observer/central-africas-guardians-of-the-forest-slaughtered-for-myths-and-meat>, accessed 6 June 2025; Environmental Investigation Agency (EIA), 'Out of Africa: How West and Central Africa Have Become the Epicentre of Ivory and Pangolin Scale Trafficking to Asia', December 2020, <https://reports.eia-international.org/out-of-africa/>, accessed 6 June 2025.
16. UNODC, *World Wildlife Crime Report 2024*, p. 200; Monitoring the Illegal Killing of Elephants (MIKE), 'Results: PIKE Continental Trend', <https://cites.org/eng/mike/analysis#results>, accessed 6 June 2025.
17. Patrol staff working in MIKE sites record data on each elephant carcass they find, including whether it was killed illegally and if the ivory has been removed. The government for each range state collects the data from all its MIKE sites, checks its accuracy and consistency and shares it with the MIKE Programme. The MIKE programme estimates the Proportion of Illegally Killed Elephants (PIKE), which is calculated as the number of illegally killed elephants found divided by the total number of elephant carcasses encountered. The PIKE metric for Central Africa increased from 0.47 in 2020 to 0.58 in 2023. See MIKE, 'Results: PIKE Sub-Regional Trend', <https://cites.org/eng/mike/analysis#results>, accessed 6 June 2025; Chris Thouless et al., *African Elephant Status Report 2016: An Update from the African Elephant Database,* International Union for Conservation of Nature (IUCN) Species Survival Commission (Gland, Switzerland: IUCN, 2016).

Figure 1: Number of Reported Fauna Seizures in Central African Countries, 2020–24



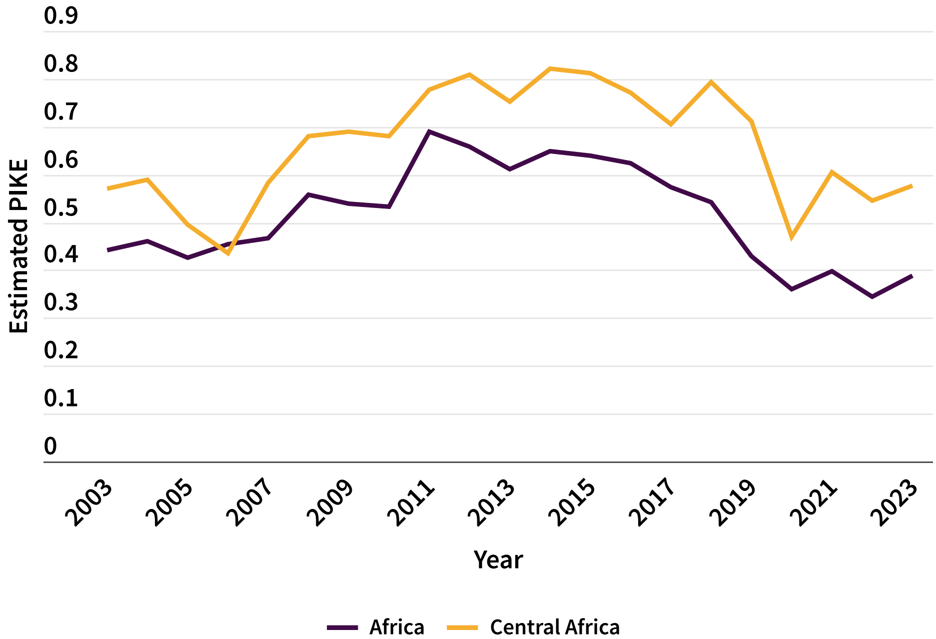
Source: TRAFFIC, 'Wildlife Trade Portal', <www.wildlifetradeportal.org>, accessed 15 May 2025.

Figure 2: Number of Reported Fauna Seizures in Central African Countries, 2020–24



Source: TRAFFIC, 'Wildlife Trade Portal'.

Figure 3: Proportion of Illegally Killed Elephants (PIKE) – All Africa Compared to Central Africa, 2003–23



Source: CITES, 'Report on Monitoring the Illegal Killing of Elephants (MIKE)', July 2025, <https://cites.org/eng/prog/mike/index.php/portal>, accessed 8 April 2025.

Over the past decade, flows of ivory trade have undergone a westward displacement, following the introduction of more stringent controls and high-profile arrests in East African transit hubs in the 2010s – such as the Port of Mombasa in Kenya.[18] Since 2016, ivory traffickers have exploited enforcement asymmetries by increasingly transiting through Central Africa to exit the continent from ports such as Apapa in Nigeria.[19]

Wildlife offenders are not a homogenous group. For example, ivory-poaching groups appear numerous, disparate and disorganised, but DNA analysis of large-scale seizures suggests ivory-trafficking networks are dominated by a limited number of hierarchical, transboundary syndicates, who finance local poachers and consolidate their small

18. Saba Kassa et al., 'A Worm's-Eye View of Wildlife Trafficking in Uganda – the Path of Least Resistance', Working Paper 33, Basel Institute on Governance, October 2020, p. 20, <https://baselgovernance.org/publications/working-paper-33-worms-eye-view-wildlife-trafficking-uganda-path-least-resistance>, accessed 7 April 2025.
19. EIA, 'Two Sides of the Same Coin: Tackling Transnational Wildlife Trafficking Between West and Central Africa and South-East Asia', Wildlife Briefing, November 2022, <https://eia-international.org/report/two-sides-of-the-same-coin-tackling-transnational-wildlife-trafficking-between-west-and-central-africa-and-south-east-asia/>, accessed 7 April 2025; Ojewale, 'Central Africa's Guardians of the Forest Slaughtered for Myths and Meat'; Reid and Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa'; Ted Malanda, 'Wildlife Traffickers' New Routes', *East African*, 16 October 2024, <https://www.theeastafrican.co.ke/tea/sustainability/wildlife-traffickers-new-routes-4795600>, accessed 7 April 2025.

amounts of product into multi-tonne consignments for export.[20] The case study in Box 1 demonstrates the transnational and elusive nature of highly specialised ivory traffickers.

Box 1: Case Study – Central Africa Ivory Trafficking Operation

In February 2024, the Nigerian Customs Service arrested a Cameroonian national in the border town of Mfum, Cross River State, in possession of a firearm, ammunition and 52 tusks of raw ivory (about 200 kg), valued at approximately NGN 300 million (about $330,000).[21] According to an interviewee for this study, the ivory was concealed in hidden compartments in a truck and, after two weeks in custody, the suspect negotiated an unofficial release, enabling him to abscond. Reportedly, he was arrested again in Cameroon, only to 'escape' detention once more.[22]

The individual is allegedly linked to two earlier seizures:

- In October 2020, the same suspect was arrested in Ambam, Cameroon, with at least 626 kg of unworked ivory, also concealed in a hidden vehicle compartment.[23] According to the Eco Activists for Governance and Law Enforcement (EAGLE) – a network of sub-Saharan NGOs supporting IWT investigations and prosecutions, including in Cameroon – the ivory in this seizure originated from Gabon and Equatorial Guinea.[24] The suspect received a four-month sentence, later overturned to a 12-month suspended sentence accompanied by a fine of XAF 62 million (about $100,000) in damages.[25] The authors could find no evidence that these damages were ever recovered.

20. Wasser et al., 'Combating Transnational Organized Crime by Linking Multiple Large Ivory Seizures to the Same Dealer'.
21. Ruth Akata, 'Customs Arrests Cameroonian With Pistol, 52 Elephant Tusks in Mfum', Nigeria Customs Service Monthly Newsletter (Vol. 13, February 2024), p. 31, <https://customs.gov.ng/wp-content/uploads/2024/03/CUSTOMS-e-NEWSLETTER-FEBRUARY-2024_compressed-1-1.pdf>, accessed 25 May 2025.
22. Authors' interview with regional law enforcement expert, online, 12 June 2024.
23. Franck Bafeli, 'Cameroon: Ivory Trafficker to Appear at the Ambam Court of First Instance on 19 November 2020', All Africa, 8 November 2020, <https://allafrica.com/stories/202011090041.html>, accessed 9 June 2025.
24. Eco Activists for Governance and Law Enforcement (EAGLE), 'The EAGLE Network Annual Report 2020', <https://www.eagle-enforcement.org/annual-reports/>, accessed 5 July 2024.
25. Last Great Ape Organization (LAGA), 'Activity Report January 2021', <https://www.laga-enforcement.org/en/activity-report-january-2021-R>, accessed 25 June 2024.

- In August 2023, five suspects were arrested in Gabon in connection with 131 kg of ivory, also hidden in secret vehicle compartments.[26] These suspects are thought to be responsible for exporting multiple tonnes of elephant ivory from Gabon to Cameroon.[27] Gabonese media suggested the same Cameroonian national was the leader of the Gabon syndicate. According to EAGLE, the head of this Gabonese syndicate is a Cameroonian trafficker who has a previous conviction that fits the profile of the Amban case outlined above.[28]

The three different cases total about 957 kg of unworked ivory and provide insights into the scale and modalities of ivory trafficking between Central and West Africa – whereby seemingly disparate networks operate transnationally, using pyramidical structures and complex concealment technologies to traffic ivory across borders, avoid detection and evade justice.[29]

Central African countries – including Cameroon, the CAR, Gabon and the RoC – are also key jurisdictions implicated in the illicit pangolin trade. Pangolins are harvested in rural areas for meat and middlemen consolidate their scales for export to Asia for use in traditional medicine.[30] Pangolin scales can be co-mingled with ivory shipments.[31]

Endangered bird, reptile and primate species in Central Africa also face domestic threat from a demand for their use in ritual practice, as well as a global demand for live specimens serving exotic pet markets around the world. Large quantities of African grey parrots are frequently seized in Cameroon, the DRC, the RoC[32] and internationally – such as a consignment of 309 parrots intercepted in Turkey during 2024[33] – indicating a large and well-organised illicit trade. African grey parrots are also

26. *Gabon News*, 'Démantèlement d'un Réseau International de Trafic d'Ivoire, du Gabon Vers le Cameroun' ['Dismantling an International Ivory Trafficking Network from Gabon to Cameroon'], 25 August 2023, <https://gabonews.com/fr/actus/international/article/demantelement-d-un-reseau-international-de-trafic>, accessed 9 June 2025.
27. *24 Presse*, 'Gabon - Cameroon International Ivory Trafficking Network Dismantled', 14 August 2023, <https://www.24presse.com/press-release/environnement/gabon___cameroon_international_ivory_trafficking_network_dismantled_9925499/>, accessed 9 June 2025.
28. *Ibid.*; EAGLE, 'The EAGLE Network Annual Report 2023', <https://www.eagle-enforcement.org/data/files/eagle-network-annual-report-2023.pdf>, accessed 10 June 2024.
29. LAGA, 'First Semester Report January–June 2023', <https://www.laga-enforcement.org/en/annual-and-semester-reports>, accessed 9 June 2024.
30. Ojewale, 'Central Africa's Guardians of the Forest Slaughtered for Myths and Meat'; Alain Din Dipita et al., 'Genetic Tracing of the Illegal Trade of the White-Bellied Pangolin (*Phataginus tricuspis*) in Western Central Africa', *Scientific Reports* (Vol. 14, 2024); Daniel J Ingram et al., 'Characterising Trafficking and Trade of Pangolins in the Gulf of Guinea', *Global Ecology and Conservation* (Vol. 17, 2019).
31. EIA, 'Out of Africa', p. 13.
32. TRAFFIC, 'Wildlife Trade Portal'.
33. Gabs Mia, 'Grey Parrot Seized in Turkey Uncovers Illegal Export Ring of Congo's Animal Trafficking', *TalkAfrica*, 4 September 2024.

co-mingled with live primates,[34] and regional web monitoring confirms birds, primates and reptiles are among the most marketed species online.[35] Notably, given the live cargo, the operating methods for trafficking these species vary in concealment, transport and routing tactics when compared with ivory or pangolin consignments.

Regional bushmeat consumption has its roots in customary hunting practice in Central Africa and remains critical for the subsistence needs of many forest-dependent people. However, illegal bushmeat markets are becoming increasingly commercialised and large scale due to domestic urbanisation and demand from the international diaspora. These markets frequently feature critically endangered and heavily protected species, including pangolins and primates.[36] Bushmeat volumes in Central Africa are estimated to exceed 1 million tonnes, and the value of the trade in West and Central Africa is estimated to range from $42 million to $205 million annually.[37] Some of this is smuggled through international airports, with analysis suggesting 3.9 tonnes of bushmeat pass through Brussels airport every month, reflecting the organised nature of this trade[38] and elevating biosecurity threats of zoonotic spillovers into human populations, as seen with mpox and Ebola.[39]

Countries with high levels of IWT are characterised by weak governance and systemic corruption.[40] In the DRC, Cameroon and the CAR, traffickers are reportedly bribing enforcement, border and customs personnel to facilitate the international trafficking of ivory and pangolin products.[41] These corrupt behaviours allow trafficking networks to operate with impunity. In Cameroon, for example, suspected influence peddling and corruption may have resulted in acquittals or weak sentencing, while court fines are rarely recovered.[42] Reports from the DRC and the RoC also detail the leakage of

34. TRAFFIC, 'Wildlife Trade Portal'. In 2020–24, 25% of African grey parrot seizures included primates.
35. Woolloff et al., 'Cyber-Enabled Wildlife Trade'.
36. Murielle Majiteu et al., 'Wild Animal Trade in Cameroon: An Insight into Species Involved and Conservation Implications in the Western Highlands', *Ecological Solutions and Evidence* (Vol. 5, No. 2, 2024); Linh Bao Nguyen et al., 'Understanding Consumer Demand for Bushmeat in Urban Centers of Cameroon with a Focus on Pangolin Species', *Conservation Science and Practice* (Vol. 3, No. 6, 2021).
37. R Nasi et al., *Conservation and Use of Wildlife-Based Resources: The Bushmeat Crisis* (Montreal: Secretariat of the Convention on Biological Diversity, 2008).
38. Phoebe Weston, 'Smoked Monkey and Whole Sharks: The Suitcase Smugglers Feeding Europe's Hunger for Bushmeat', *The Guardian*, 1 February 2024.
39. Merel Hilderink and Iris de Winter, 'No Need to Beat Around the Bushmeat – The Role of Wildlife Trade and Conservation Initiatives in the Emergence of Zoonotic Diseases', *Heliyon* (Vol. 7, No. 7, 2021).
40. Ed Laws, 'The Political Economy of the Illegal Wildlife Trade', K4D Helpdesk Report, Institute of Development Studies, 2017, <https://opendocs.ids.ac.uk/articles/report/The_political_economy_of_the_illegal_wildlife_trade/26453653>, accessed 7 April 2025.
41. Ojewale, 'Central Africa's Guardians of the Forest Slaughtered for Myths and Meat'.
42. TRAFFIC, Central Africa Programme Office, 'Analysis of Wildlife Court Cases in Cameroon, January 2010–December 2022', October 2023, <https://www.traffic.org/publications/reports/cca-cameroon/>, accessed 7 April 2025.

confiscated ivory from court evidence rooms and government stockpiles due to the absence of centralised controls, reducing the deterrent effect of seizures.[43]

Corrupt high-level officials can also be complicit in international IWT flows, providing traffickers with the paperwork to launder illegally harvested species into 'legitimate' trade pathways. In 2023, the US imposed visa restrictions on the current and former heads of the DRC's CITES Management Authority (Institut Congolais pour la Conservation de la Nature/Congolese Institute for the Conservation of Nature) on the basis that they had falsified CITES export permits for protected species to be sent to China in exchange for bribes.[44] Senior officials – or politically exposed persons (PEPs) – can therefore collude with wildlife traffickers in conducting IWT, often under the guise of legal commercial or non-commercial trade.[45]

According to officials familiar with IWT supply chains, payment to PEPs is overwhelmingly in cash. However, one former regional official cited cases in which payment was made via the transferral of goods, including improvised firearms.[46] Between middlemen and local poachers, 'mobile money' payments (digital transactions made by phone) are often used, but these are thought to be considerably less common than cash payment. The prevalence of cash is not specific to IWT transactions, but reflects low levels of banking inclusion in the Communauté Economique et Monétaire de l'Afrique Centrale (CEMAC, Economic and Monetary Community of Central Africa).[47] Bribes to facilitate or mask criminality are also overwhelmingly paid in cash, as recognised in each of the MERs and selected national risk assessments (NRAs) of the seven countries in this paper. The cash-dominant structures of Central African economies, combined with their reduced traceability compared with formal banking transactions, may be one factor limiting the number of IWT-related STRs being filed across the region.

Beyond small-scale cash transactions linked to harvesting at source and bribes to officials, there is a lack of financial intelligence on IWT-related IFFs beyond the point of consolidation, prior to export and onward transit to demand markets. A case involving two DRC-based wildlife traffickers suggested that payments from US-based buyers would be routed via a Chinese bank before the money would be sent to

43. Jonas Kiriko, 'DRC Stockpiles Fuel Illegal Wildlife Trade', *Oxpeckers*, August 2023, <https://oxpeckers.org/2023/08/drc-stockpiles/>, accessed 4 April 2025; EAGLE, 'The EAGLE Network Annual Report 2024', <https://www.eagle-enforcement.org/annual-reports/>, accessed 7 April 2025.
44. Lieth Carrillo, 'Congolese Officials Sanctioned for Participating in Wildlife Trafficking', Organized Crime and Corruption Reporting Project (OCCRP), 21 August 2023, <https://www.occrp.org/en/news/congolese-officials-sanctioned-for-participating-in-wildlife-trafficking>, accessed 4 April 2025.
45. Spoorthy Raman, 'DRC Government Directive Triggers Panic in Ape Sanctuaries Amid Ongoing Conflict', *Mongabay*, 21 February 2025, <https://news.mongabay.com/2025/02/drc-government-directive-triggers-panic-in-ape-sanctuaries-amid-ongoing-conflict/>, accessed 4 April 2025.
46. Authors' interview with regional law enforcement expert, online, 27 March 2024.
47. Open Banking Nigeria, 'Overview of The Central Bank and Regional Banking: The CEMAC Region', <https://openbanking.ng/open-banking-in-the-cemac-region/>, accessed 6 June 2025.

Kinshasha.[48] A Gabon-led ivory investigation revealed that Nigerian exporters had transferred money to an intermediary in Gabon using a *hawala*-style payment system,[49] thus bypassing the scrutiny of traditional banking AML systems. The funds were used to pay criminal associates and bribe public officials.[50] The scale of international, IWT-related revenues suggest that hawala-like systems may be a widely used means of making clandestine illicit payments and laundering criminal proceeds along the supply chain, but they remain poorly understood.

Overall, Central Africa has experienced a significant increase in IWT – both as a source and transit region. Previously concentrated in East Africa, fauna and flora crime have both grown significantly, alongside their associated IFFs.

Trends: Flora

The Congo Basin – predominantly spanning Cameroon, the CAR, the DRC, the RoC, Equatorial Guinea and Gabon – has the second-largest tropical forest in the world. The forests of Central Africa are biodiversity strongholds that act as the world's largest carbon sink,[51] absorbing more carbon dioxide than they release and creating a critical buffer against climate change. Regional forests also provide livelihoods for millions of people with largely untapped opportunities for sustainable economic diversification and social development.[52] Cameroon and Gabon, for example, are major exporters of wood products; yet, regionally, domestic processing remains underdeveloped. In 2022, tax avoidance, informality, corruption and illegal logging have limited potential forestry revenues to just 1% of total tax revenues and 0.2% of gross domestic product in Congo Basin countries.[53]

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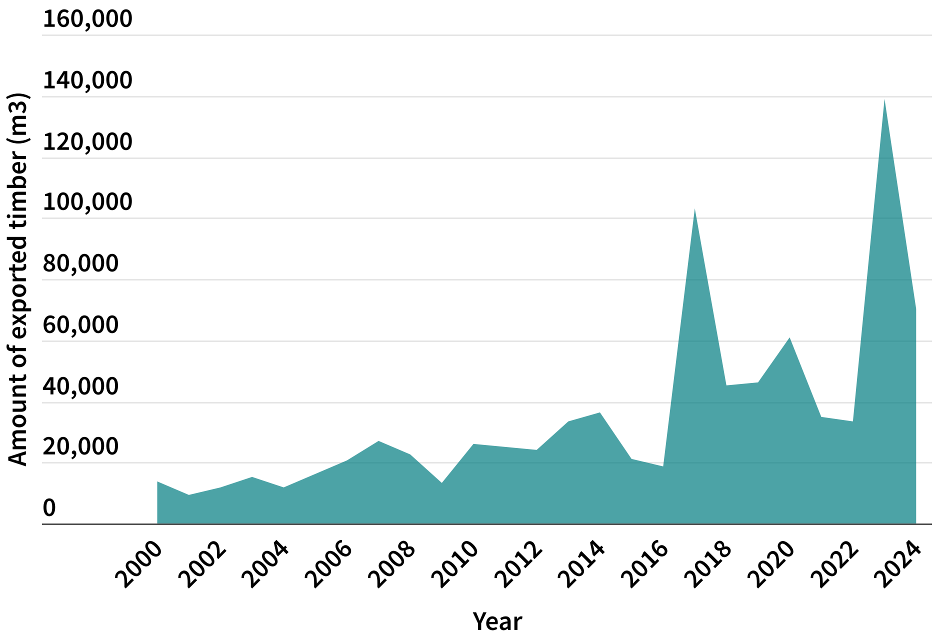
48. US Department of Justice, 'Two Foreign Nationals Sentenced to Prison for Trafficking Ivory and Rhinoceros Horn from the Democratic Republic of the Congo', 1 November 2022, <https://www.justice.gov/archives/opa/pr/two-foreign-nationals-sentenced-prison-trafficking-ivory-and-rhinoceros-horn-democratic>, accessed 16 May 2025.
49. *Hawala* is an underground or informal money transfer system predicated on trust where funds are transferred without physical exchange of currency between a network of brokers, known as *hawaladars*.
50. TRAFFIC, 'Case Digest: Initial Analysis of the Financial Flows and Payment Mechanisms Behind Wildlife and Forest Crime', March 2021, Case 3, p. 36, <https://www.traffic.org/publications/reports/case-digest-an-initial-analysis-of-the-financial-flows-and-payment-mechanisms-behind-wildlife-and-forest-crime/>, accessed 24 April 2025.
51. World Economic Forum, 'The Democratic Republic of Congo to Create the Earth's Largest Protected Tropical Forest Reserve', 22 January 2025, <https://www.weforum.org/stories/2025/01/congo-kivu-kinshasa-green-corridor/>, accessed 6 June 2025.
52. *Ibid.*; Julius Tupezi Tieguhong, *'Economic Performance of the Congo Basin's Forestry Sector'*, African Natural Resources Centre (ANRC), African Development Bank, 2021, p. 4, <https://www.afdb.org/sites/default/files/documents/publications/economic_performance_of_the_congo_basins_forestry_sector.pdf>, accessed 25 May 2025.
53. World Bank, *'Unlocking Forestry Sector's Potential – Economic Barometer for the Central African Economic and Monetary Community – December 2024 Edition*', 20 December 2024, <https://www.worldbank.org/en/region/afr/publication/unlocking-forestry-sector-potential-economic-barometer-for-the-central-african-economic-and-monetary-community>, accessed 23 April 2025.

Forests in the Congo Basin face threats from human activity such as land conversion for agriculture and extractive activities (including commercial logging and mining).[54] Such activities can be legitimate, but the NGO Forest Trends assesses all Central African countries to be 'Higher Risk' for illegal deforestation and associated trade and describes illegal logging as 'widely reported' in Cameroon, 'widespread' in Gabon, 'pervasive' in the RoC and 'increasing' in the DRC.[55]

Regionally, the illegality associated with the export of high-value and CITES-protected timber species is pervasive, especially regarding international trade to China and Vietnam, both significant consumer markets.[56] Figure 4 indicates that regional exports of CITES-protected species have increased significantly since 2016. Unsustainable exports of commercial species from West and Central Africa have led to trade suspensions by CITES, as seen with the addition of *Afzelia* spp. (doussie), *Khaya* spp. (African mahogany) and *Pterocarpus* spp. (African rosewood, padauk or kosso) to CITES Appendix II in February 2023.[57] Gabon, the RoC and the DRC were among the top exporters of rosewood; Cameroon, the RoC, the DRC and Gabon were among the largest exporters of mahogany; and Cameroon was in the top three exporters for doussie.[58] Unlisted species are also affected due to fraud, bribery and other violations at source. For example, a long-running investigation by the US-based Environmental Investigation Agency (EIA) has documented criminality and corruption in supply chains for *Aucoumea klaineana* (okoumé), implicating commercial logging companies in the RoC, Gabon and Equatorial Guinea. China-based manufacturers of veneer and door skins – the outer layer which covers a door's core – were also implicated, along with door manufacturers and home retailers in the US.[59]

54. P Gillet et al., 'Quelles Sont les Causes de la Déforestation Dans le Bassin du Congo? Synthèse Bibliographique et Etudes de Cas' ['What Are the Causes of Deforestation in the Congo Basin? Bibliographic Synthesis and Case Studies'], *Biotechnologie, Agronomie, Société et Environnement* (Vol. 20, No. 2, 2016), pp. 183–194.
55. Forest Trends, 'Illegal Deforestation and Associated Trade (IDAT) Risk', <https://www.forest-trends.org/idat/>, accessed 23 April 2025.
56. Hassoum Ceesa et al., 'Razing Africa: Combatting Criminal Consortia in the Logging Sector', Research Paper 6, ENACT, 2018, pp. 6–7, Table 1, <https://enactafrica.org/research/research-papers/razing-africa-combatting-criminal-consortia-in-the-logging-sector>, accessed 7 April 2025.
57. Catherine Rutherford et al., 'New CITES Regulations for Timber Species Afzelia, Khaya, and Pterocarpus, and Implications for African Exporters and Chinese and Vietnamese Importers', Forest Policy Trade and Finance Initiative Brief, February 2023, <https://www.forest-trends.org/wp-content/uploads/2023/02/AfricanListingsCOP19Brief_formatted-PDF-FINAL-1.pdf>, accessed 6 May 2025.
58. *Ibid*.
59. EIA, 'Failing the Forest: How Home Depot Has Sold Illegal Congo Basin Timber to its Customers for Over a Decade', May 2024, <https://eia.org/report/failing-the-forest/>, accessed 7 April 2025.

Figure 4: Reported CITES-Protected Timber Exports From Central Africa, 2000–24



Source: The authors, using data from CITES Trade Database, UNEP-WCMC on behalf of CITES Secretariat, <https://trade.cites.org/>, accessed 3 February 2025.

Regulatory responses designed to address timber crime and stimulate legal, domestic wood-processing economies have been attempted at the regional level, with CEMAC countries agreeing to introduce a ban on the export of raw timber from 2022 onwards. However, this has been delayed, patchily implemented and poorly enforced by most states, from a fear of losing export revenues.[60] An exception is Gabon, which introduced and effectively enforced a raw timber export ban in 2011. Although illegality is still present in the Gabonese timber sector,[61] the ban is credited with helping mitigate the country's share of certain illegal flows. For instance, Gabon now exports negligible levels of okoumé.[62] As a stepping stone to a total ban, some countries have adopted economic incentives to develop domestic wood-processing industries, such as Cameroon, where export duties on raw timber rose from 17.5% to 75% between 2017 and 2024.[63]

International policy frameworks also seek to strengthen forest governance and reduce illegality through market-based or legal approaches. Between 2007 and 2010, the EU's

60. Moki Edwin Kindzeka, 'Central African States Fail to Honor Timber Export Ban', *Voice of America*, 2 February 2023, <https://www.voanews.com/a/central-african-states-fail-to-honor-timber-export-ban-/6945074.html>, accessed 19 June 2025.
61. Forest Trends, 'Timber Legality Risk Dashboard: Gabon', September 2024, <https://www.forest-trends.org/wp-content/uploads/2022/01/Dashboard-Gabon_Sept-2024.pdf>, accessed 7 April 2025.
62. EIA, 'Failing the Forest'.
63. Business in Cameroon, 'Cameroon's Timber Output Projected to Rise in 2025 Despite Higher Export Taxes', 5 May 2025, <https://www.businessincameroon.com/public-management/0505-14638-cameroon-s-timber-output-projected-to-rise-in-2025-despite-higher-export-taxes>, accessed 19 June 2025.

Forest Law Enforcement, Governance and Trade Action Plan started negotiations for Voluntary Partnership Agreements (VPAs) with Cameroon, the CAR, the DRC, Gabon and the RoC. The VPA process has been credited with advancing dialogue, transparency and governance, yet the approach has also been criticised due to a lack of tangible outcomes.[64] VPAs for the DRC and Gabon have never been ratified – Gabon requested to exit the process in 2021 – and the European Commission recently proposed terminating the Cameroonian VPA, citing waning political resolve and worsening governance.[65] International legislation with extraterritorial scope, such as the US Lacey Act[66] and the EU Deforestation Regulation (EUDR),[67] attempt to deter criminality in US and EU supply chains with the aim of reducing deforestation, notwithstanding the delays in implementing the EUDR.[68]

Criminal methods in trafficking illicit flora differ from those for fauna. Most timber products are only profitable in significant volumes, requiring dedicated logistics to exploit, transport and export them, and making a consignment hard to conceal. As such, fraud and corruption typologies are prevalent in timber crime, facilitating large-scale containerised shipments of illicit timber by seemingly legitimate corporate actors for the international market, as well as the laundering of illegally logged timber into local sawmills.[69] Illicit timber moves both east and west, depending on road networks and proximal shipping routes. For example, in eastern DRC, illegally harvested African mahogany is fraudulently smuggled into Uganda via the border town of Lia and sold to buyers across East Africa, especially Kenya.[70] In Cameroon, locally logged rosewood is illegally exported through the Cameroonian port of Douala or Nigerian ports.[71] Indeed, Cameroonian ports are shipping hubs for timber from across the region,[72] including for illicit exports from the CAR associated with the sanctioned Wagner Group (Box 2).

64. Rebecca L Rutt et al., 'FLEGT: Another 'Forestry Fad'?', *Environmental Science & Policy* (Vol. 89, 2018), pp. 266–72.
65. European Commission, 'Document 52024PC0446 – Proposal for a Council Decision on the Termination of the Voluntary Partnership Agreement between the European Union and the Republic of Cameroon on Forest Law Enforcement Governance and Trade in Timber and Derived Products to the Union', 2 October 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52024PC0446>, accessed 30 September 2024.
66. Union of Concerned Scientists, 'The Lacey Act's Effectiveness in Reducing Illegal Wood Imports', October 2015, <https://docs.house.gov/meetings/II/II13/20240214/116787/HHRG-118-II13-20240214-SD004.pdf>, accessed 16 June 2024.
67. European Commission, 'Regulation on Deforestation-Free Products', <https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en>, accessed 10 October 2024.
68. Bart H Meijer and Maytaal Angel, 'EU Proposes to Delay Landmark Anti-Deforestation Law by 12 Months', *Reuters*, 2 October 2024.
69. Josiane Kouagheu and Madeleine Ngeunga, 'Cameroon's Undeterred Illegal Loggers', Pulitzer Center, 8 June 2023, <https://pulitzercenter.org/stories/cameroons-undeterred-illegal-loggers>, accessed 10 June 2024.
70. Musinguzi Blanshe, 'Timber Hustling: Lia, A Thriving Hub for Congolese Mahogany Trafficked to Uganda, Kenya', *Africa Report*, 3 April 2024, <https://www.theafricareport.com/341713/timber-hustling-lia-a-thriving-hub-for-congolese-mahogany-trafficked-to-uganda-kenya/>, accessed 14 May 2025.
71. Christian Locka, 'How Rosewood is Stolen in Cameroon, Laundered in Nigeria, and Exported to China', Pulitzer Center, 1 February 2022, <https://pulitzercenter.org/stories/how-rosewood-stolen-cameroon-laundered-nigeria-and-exported-china>, accessed 14 May 2025.
72. Forest Trends, 'Timber Legality Risk Dashboard: Cameroon', August 2024, <https://www.forest-trends.org/wp-content/uploads/2022/01/Dashboard-Cameroon_Aug-2024-1-1.pdf>, accessed 7 April 2025.

Companies involved in illicit timber exports are functionally dependent on the procurement of fraudulent licences, or on co-mingling illegally and legally sourced timber and thereby exploiting traceability deficits and species identification challenges.[73] Various types of corrupt transactions take place across the supply chain, facilitated by multi-level public officials, including: irregular procurement of timber concessions[74] and overlooking operational irregularities; illegal construction of logging roads; and fraudulent issue of export licences and customs declarations.[75] Timber crime therefore involves diverse actors, including artisanal loggers, 'criminal networks, state-embedded actors, foreign actors, and "mafia style groups"'.[76]

Links between corporate actors involved in timber crime and foreign investors are evident. Chinese and Vietnamese corporate actors have targeted and exploited high-demand commercial species from the region on an industrial scale.[77] In Cameroon, Sino-Asian investors are deeply embedded at multiple stages of timber supply chains,[78] and Vietnamese companies have been associated with illegally logged timber, exceeded export quotas and tax evasion.[79] *Pterocarpus erinaceus* has been aggressively targeted by Chinese companies, mainly for the luxury furniture market.[80]

Such trends in the countries and nationalities involved in illicit timber exports from Central Africa represent jurisdictional typologies that are reflected in the analysis of discrepancies between export values reported by source countries, and corresponding import values recorded by demand countries. The literature on

73. Nicholas Atampugre, 'Early Warning: Anticipating Illegal Timber Logging Trends in Cameroon', ENACT, January 2024, pp. 6–7, <https://enactafrica.org/research/policy-briefs/early-warning-anticipating-illegal-timber-logging-trends-in-cameroon>, accessed xxx; see also inclusion on 'principal species' in James Mayers, Samuel Nguiffo and Samuel Assembe-Mvondo, *China in Cameroon's Forests: A Review of Issues and Progress for Livelihoods and Sustainability* (London: International Institute for Environment and Development, 2019), p. 31, <https://www.iied.org/sites/default/files/pdfs/migrate/13599IIED.pdf>, accessed 7 April 2025.
74. A timber concession refers to the legal rights granted by the state to a company to harvest timber from a designated area in a public forest. The terms of the concession, and related licences or permits, usually allow the concessionaire to cut timber under certain regulations, for instance for a specified period, or up to a certain quota. See Food and Agriculture Organisation, 'Governance Principles for Concessions and Contracts in Public Forests', <https://www.fao.org/4/y1398e/y1398e00.htm>, accessed 5 June 2025.
75. Julius Chupezi Tieguhong, 'Illicit Trading in Africa's Forest Products: Focus on Timber', African Development Bank, 2021, pp. 7–8, <https://www.afdb.org/sites/default/files/documents/publications/illicit_timber_trade_report.pdf>, accessed 7 April 2025.
76. C Browne, Catherine Lena Kelly and Carl Pilgram, 'Illegal Logging in Africa and its Security Implications', Africa Center for Strategic Studies, 12 August 2022, para. 7, <https://africacenter.org/spotlight/illegal-logging-in-africa-and-its-security-implications/>, accessed 16 May 2025.
77. Rutherford et al., 'New CITES Regulations for Timber Species'; International Tropical Timber Organization, Tropical Timber Market Report (Vol. 27, No. 3, 1–15 February 2023), pp. 1–26.
78. Armand Zongang, 'Timber Trade in Cameroon Controlled by Asian Companies', WWF Cameroon, August 2019, p. 35, <https://dtnac4dfluyw8.cloudfront.net/downloads/timber_trade_in_cameroon_controlled_by_asian_companies.pdf>, accessed 7 April 2025.
79. EIA and Centre pour l'Environnement et le Développement (CED), 'Tainted Timber, Tarnished Temples: How the Cameroon-Vietnam Timber Trade Hurts the Cameroonian People and Forests', November 2020, <https://eia.org/report/20201110-tainted-timber-tarnished-temples/>, accessed 7 April 2025.
80. Locka, 'How Rosewood is Stolen in Cameroon'.

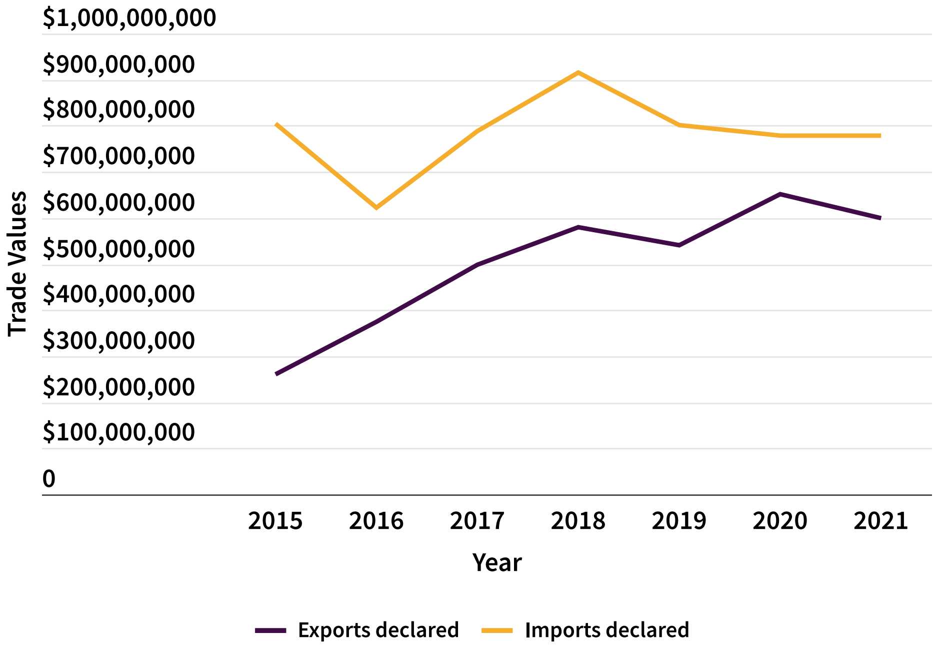
trading discrepancies attributes gaps between export and import values of 10–20% to administrative irregularities,[81] but more significant variances indicate potential fraud[82] – suggesting possible trade-based ML and tax evasion. For example, analysis conducted by the authors using the UN Comtrade database[83] shows that import values recorded between 2015 and 2021 by China, the region's largest timber trading partner, were 56% higher than the equivalent export records from Cameroon, the CAR, the RoC, the DRC and Gabon – a trade discrepancy of $1.9 billion.[84] As shown in Figures 4 and 5, these discrepancies have decreased over time, mainly due to an increase in recorded exports by Central African countries of the UN Comtrade classification for 'sawn wood'. Discrepancies for 'wood in the rough', or raw timber, remained high as per the last year of available data in 2021 ($167 million).[85]

Of the countries analysed for this paper, the CAR, the DRC and Cameroon appear particularly vulnerable to significant trade discrepancies, indicating that Central African governments risk being deprived of substantial tax revenues.[86] The vast sums of money associated with the illegal timber trade out of Central Africa require equally significant means to launder the proceeds of crime. Although the trade discrepancy analysis only indicates the risk of illicit activity, it does indicate the magnitude of under- and over-invoicing, or short- and over-shipping, for timber sourced from the region.[87] The discrepancies work both ways: exported timber is under-invoiced and short-shipped, and imported timber is over-invoiced and over-shipped. One explanation, considering the quantities and values of timber involved, is that timber may itself be considered an asset in underground banking systems – including the Chinese system known as *feiqian* ('flying money'). In this scenario, brokers convert their funds to valuable hardwood and transfer some of that value to China by under-

81. World Bank Group, 'Imports, Exports and Mirror Data with UN COMTRADE', WITS Online Help, 2010, <https://wits.worldbank.org/wits/wits/witshelp/content/data_retrieval/T/Intro/B2.Imports_Exports_and_Mirror.htm>, accessed 10 May 2024.
82. Christopher Grigoriou et al., 'How Helpful are Mirror Statistics for Customs Reform? Lessons from a Decade of Operational Use', *World Customs Journal* (Vol. 13, No. 2, 2019), pp. 105–14.
83. The UN Commodity Trade Statistics (Comtrade) database contains detailed records of imports and exports reported by the authorities of nearly 200 countries or areas against Harmonised System (HS) codes, which aid standardisation. It is considered the most comprehensive database of its kind, representing over 99% of global trade. See UN Comtrade Database, 'Free Access to Detailed Global Trade Data', <https://comtradeplus.un.org/>, accessed 14 April 2025.
84. This discrepancy was identified when comparing the trade records for HS codes 4403 ('wood in the rough', or raw timber) and 4407 ('sawn wood').
85. Authors' analysis of UN Comtrade Database.
86. According to World Bank data, 0% indicates there is no discrepancy between imports and exports, while 100% indicates that the import value is double the value of exports. The World Bank expects a 10–20% discrepancy due to shipping-related fees. See Siddhesh Kaushik, 'Beyond Exports and Imports: A Glossary for Understanding Global Trade', World Bank Data blog, <https://blogs.worldbank.org/en/opendata/beyond-exports-and-imports-glossary-understanding-global-trade>, accessed 23 April 2025; UN Comtrade Database.
87. George Herbert, 'Illicit Financial Flows between China and Developing Countries in Asia and Africa', K4D Helpdesk Report, Institute of Development Studies, 2020, <https://opendocs.ids.ac.uk/articles/report/Illicit_Financial_Flows_Between_China_and_Developing_Countries_in_Asia_and_Africa/26428633>, accessed 7 April 2025.

invoicing log shipments, thus making timber a proxy for cash. In turn, illicit values can be sent to Central Africa via over-invoicing, evading strict Chinese capital controls.[88]

Figure 5: Recorded Timber Trade Values for 'Wood in the Rough' and 'Sawn Wood' Between Central Africa and China, 2015–21



Source: UN Comtrade Database, <https://comtradeplus.un.org/>, accessed 14 April 2025.

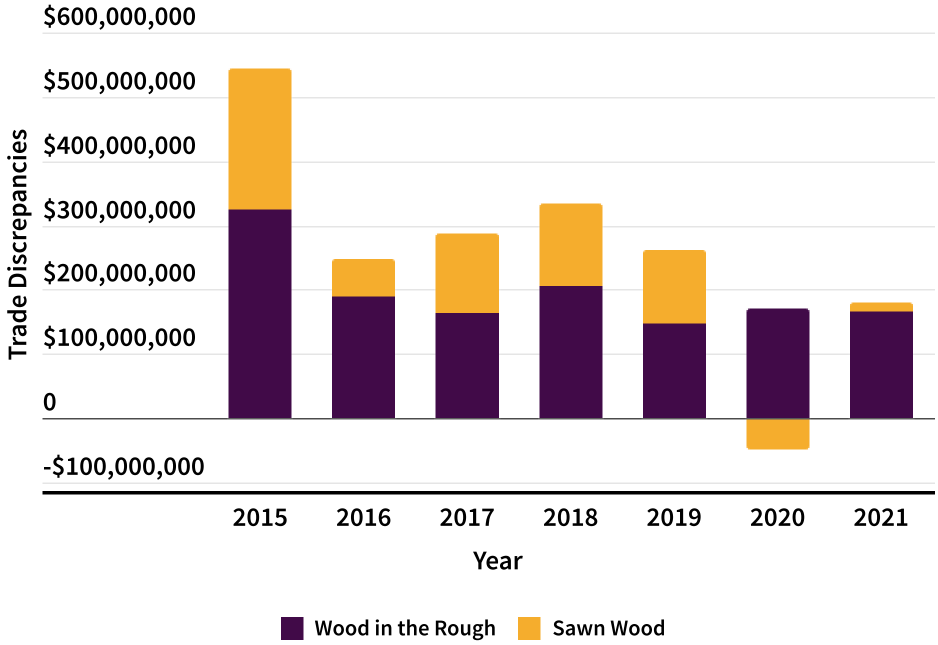
In other cases, much of the profit associated with timber crime may never enter the source countries, limiting local financial activity to low-value payments, predominantly made in cash. For example, the foreign investors who clandestinely purchase logging titles through local actors in source countries – so that beneficial ownership is obscured – are the same entities receiving the timber in demand countries, allowing them to exploit, export and import entirely within their own operations.[89] This typology limits the need for international payments between actors, relying only on relatively small payments – typically in cash – to local facilitators.

Within Central Africa, local actors involved in illegally felling and transporting timber are also usually paid in cash. Those actors transporting timber from source to ports are given advances to cover petrol, subsistence costs and – critically – bribes at road checkpoints.[90] Exporters, foreign buyers and 'companies' similarly provide cash advances to artisanal loggers, who are often tasked with identifying rare, high-value

88. John Grobler, 'How Chinese Flying Money 'Finances' Illegal Wildlife Trade', *Oxpeckers*, 28 June 2019, <https://oxpeckers.org/2019/06/chinese-flying-money/>, accessed 20 June 2025.
89. Authors' interview with regional expert, online, 27 July 2024.
90. Josiane Kouagheu and Madeleine Ngeunga, 'How Illegal Wood Escapes Control Circuits in Cameroon', Pulitzer Center, 8 June 2023, <https://pulitzercenter.org/stories/how-illegal-wood-escapes-control-circuits-cameroon>, accessed 10 June 2024.

timber,[91] to cover the costs of illegal felling, including transportation and bribes that would normally exceed the loggers' everyday means. A similar process was uncovered by NGO investigations in Nigeria.[92]

Figure 6: Central Africa-China Trade Discrepancies for 'Wood in the Rough' and 'Sawn Wood', 2015-21



Source: UN Comtrade Database.

In sum, Central Africa's immense forestry sector spanning the Congo Basin has been rife with illegal and unsustainable exploitation, servicing both domestic and international markets. Considering the scale of the timber trafficking and laundering in the region, the associated IFFs are equally significant, although exact figures remain difficult to ascertain.

Illegal Wildlife Trade, Conflict and Terrorist Finance

To date, the discourse on the IWT terror nexus in West and Central Africa has been focused on ivory. In 2014, the UN Environment Programme (UNEP) noted that ivory was 'likely a primary source of income' for the Lord's Resistance Army (LRA), a non-state armed group operating in the borderlands of South Sudan, the CAR and the

91. *Ibid.*
92. EIA, 'The Rosewood Racket: China's Billion Dollar Illegal Timber Trade and the Devastation of Nigeria's Forests', 2017, p. 13, <https://rosewoodracket.eia-global.org/>, accessed 7 April 2025.

DRC[93] (near Garamba National Park, DRC). Subsequent research has argued that the LRA's dependence on ivory was overstated, highlighting more substantive roles played by other state and non-state actors in sourcing ivory from Garamba, including the Congolese and Ugandan militaries, South Sudanese rebels, the Mbororo and other armed horsemen groups from Sudan,[94] Chad and Libya.[95] This debate underlines the limitations of the 'ivory-terrorism' narrative, which lacks empirical evidence and risks oversimplifying the complex and evolving conflict and crime dynamics.[96] Moreover, academics have raised concerns that such narratives risk misguided militarised responses[97] that could negatively impact human rights, livelihoods and conservation efforts,[98] making it all the more vital to conduct financial investigation to understand how wildlife-related IFFs may fund or sustain conflict actors.[99]

Other claims of IWT-related threat finance in West Africa and Central Africa appear similarly contested. In 2016, there were reports in the media that Boko Haram was sourcing ivory from the Waza Biosphere Reserve[100] in the Far North region of Cameroon. This was subsequently reflected in the Nigerian FIU's response to a 2020 survey of FIUs and environmental agencies conducted by the Egmont Centre of FIU Excellence and Leadership (ECOFEL), which reasserted the link between Boko Haram and ivory trafficking in this area.[101] However, experts have challenged this, noting the

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93. C Nellemann et al., *The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources: A Rapid Response Assessment* (Nairobi and Arendal: UN Environment Programme and GRID-Arendal, 2014), p. 8. In 2011, the African Union formally designated the Lord's Resistance Army as a terrorist group.
94. The Mbororo are semi-nomadic Islamic pastoralists (often conflated with or linked to the Fulbé, Peuhl, Fula or Fulani communities) who practise transhumance across the western grasslands in Libya, Mali, Niger, Chad, Sudan and the CAR, along with – in dry seasons – northern DRC. See UN University – Institute for Water Environment and Health, 'Transhumance Pastoralism and Mbororo Pastoralists in Climate-Water-Migration-Conflict Context of the Congo River Basin', Policy Brief 3, No. 9, 28 February 2022, <https://reliefweb.int/report/democratic-republic-congo/transhumance-pastoralism-and-mbororo-pastoralists-climate-water-migration-conflict-context-congo-river-basin>, accessed 20 May 2025.
95. Kristof Titeca and Patrick Edmond, 'Outside the Frame: Looking Beyond the Myth of Garamba's LRA Ivory-Terrorism Nexus', *Conservation & Society* (Vol. 17, No. 3, 2019), pp. 258–69; Khristopher Carlson, Joanna Wright and Hannah Dönges, 'In the Line of Fire: Elephant and Rhino Poaching in Africa', in Small Arms Survey, *Small Arms Survey 2015: Weapons and the World* (Cambridge: Cambridge University Press, 2015, Box 1.2.
96. Michelle Anagnostou, 'Synthesizing Knowledge on Crime Convergence and the Illegal Wildlife Trade', *Environmental Challenges* (Vol. 5, 2021).
97. Titeca and Edmond, 'Outside the Frame', pp. 259–60.
98. Rosaleen Duffy et al., 'The Militarization of Anti-Poaching: Undermining Long Term Goals?', *Environmental Conservation* (Vol. 42, No. 4, 2015), pp. 345–48; Mark Moritz et al., 'Why Blaming Ivory Poaching on Boko Haram Isn't Helpful', *The Conversation,* 15 October 2017, <https://theconversation.com/why-blaming-ivory-poaching-on-boko-haram-isnt-helpful-83038>, accessed 15 April 2025.
99. Anagnostou, 'Synthesizing Knowledge on Crime Convergence'.
100. Aurélie Moreau and Mélanie Wenger, 'L'Ivoire de Boko Haram' ['Boko Haram's Ivory'], *La Libre*, 2016, Chapter 2, <https://dossiers.lalibre.be/livoiredebokoharam/routes.php>, accessed 15 April 2025.
101. Egmont Centre of FIU Excellence and Leadership (ECOFEL), 'Financial Investigations into Wildlife Crime', January 2021, p. 31, Point 85, <https://ecofel.org/financial-investigations-into-wildlife-crime-report/>, accessed 7 April 2025.

low elephant population in Waza,[102] debunking claims that Boko Haram used the park for anything other than occasional transit and ad-hoc hunting, and concluding that the group derived more income from kidnapping and cattle theft than IWT.[103] Separately, claims that Boko Haram profits from ivory trafficking conducted in Gabon have also been challenged.[104]

This example may reflect claims from the 2010s that Al-Shabaab in Somalia generated up to 40% of its funding from Kenya-related ivory flows, a notion later debunked by a RUSI study which concluded that any Al-Shabaab involvement in ivory was likely 'opportunistic, ad hoc and small-scale'.[105] In its summary of terrorist finance links to IWT, ECOFEL also referenced an earlier GABAC report, which outlined how rebel militias from the CAR, known as Séléka, were arrested with ivory by Chadian authorities. The predominantly Muslim Séléka claimed to be using the ivory to barter for weapons, cars and supplies, or to sell to Janjaweed militia based in Sudan.[106]

The line between IWT and threat finance is blurred, and it is arguably better to frame the convergence more broadly: 'not one of simple financing but rather a dynamic in wider conflict, illicit, or gray-area economies', whereby conflict dynamics enmesh licit and illicit actors into local and international supply chains.[107] Indeed, UNEP has claimed at least 40% of all intrastate conflicts are linked to natural resources,[108] and the UN Office on Drugs and Crime (UNODC) observes how politically motivated groups reap monetary benefits to fund ongoing operations through the control of access to natural resources.[109] In its broadest sense – when including illicit timber and illegal charcoal[110] – IWT is linked to the finances of a diverse range of conflict actors, who in

102. Moritz et al., 'Why Blaming Ivory Poaching on Boko Haram Isn't Helpful'.
103. Alice Kelly Pennaz et al., 'Not Seeing the Cattle for the Elephants: The Implications of Discursive Linkages between Boko Haram and Wildlife Poaching in Waza National Park, Cameroon', *Conservation and Society* (Vol. 16, No. 2, 2018), pp. 125–35.
104. Chris Lang, 'Is Ivory Poaching in Gabon Funding Terrorist Group Boko Haram?', *Conservation Watch*, 22 June 2018, <https://medium.com/conservationwatch/is-ivory-poaching-in-gabon-funding-terrorist-group-boko-haram-18947e19cb5e>, accessed 15 April 2025.
105. Tom Maguire and Cathy Haenlein, 'An Illusion of Complicity: Terrorism and the Illegal Ivory Trade in East Africa', *RUSI Occasional Papers* (September 2015), p. ix, <https://www.rusi.org/explore-our-research/publications/occasional-papers/illusion-complicity-terrorism-and-illegal-ivory-trade-east-africa>, accessed 7 April 2025.
106. GABAC, 'The Financing of Terrorism in Central Africa,' (April 2017), <https://gabac.org/wp-content/uploads/2022/03/6-plaquette-GABAC-anglais-OK-VF.pdf>, accessed 25 April 2025; as cited in ECOFEL, 'Financial Investigations into Wildlife Crime', p. 31, Point 86.
107. Christopher Jasparro, 'Wildlife Trafficking and Poaching: Contemporary Context and Dynamics for Security Cooperation and Military Assistance', Center on Irregular Warfare and Armed Groups (CIWAG), p. 29, <https://digital-commons.usnwc.edu/ciwag-case-studies/17/>, accessed 7 April 2025.
108. UN Environment Programme, *Protecting the Environment During Armed Conflict: An Inventory and Analysis of International Law* (Nairobi: UN Environment Programme, 2009), p. 10.
109. UNODC, '2a – Forest Crime: Global Analysis on Crimes That Affect the Environment', April 2025, p. 44, <https://www.unodc.org/documents/data-and-analysis/Crimes%20on%20Environment/ECR25_P2a_Deforestation.pdf>, accessed 7 April 2025.
110. Nellemann et al., *The Environmental Crime Crisis*, p. 81; ENACT, 'Africa Organised Crime Index: Democratic Republic of the Congo', 2023, <https://africa.ocindex.net/country/democratic_republic_of_the_congo>, accessed 15 April 2025.

turn interact with legal supply chains. For example, the NGO Global Witness has accused international timber companies of paying bribes and protection money to a succession of rebel coalitions in the CAR, including the Séléka and Antibalaka,[111] to allow their logging activities to continue.[112] This has the effect of legitimising rebel authority and supporting illicit trade in weapons.[113] In eastern DRC, the M23 rebel group is currently levying up to $700 in informal taxes on charcoal trucks at roadblocks near Virunga National Park,[114] following a long tradition of non-state armed groups profiteering from Congolese timber, cacao, minerals, marijuana and ivory through their involvement in or taxation of these flows.[115]

However, it should be noted that illicit taxation has long been the norm in eastern DRC, levied by government as well as non-government actors.[116] As well as being facilitated by domestic political elites, timber crime in Central Africa can also be driven by foreign state actors. The Wagner Group (Box 2), a proxy of the Russian state, has been exposed as establishing 'conflict timber' out of the CAR as a lucrative pillar of the Kremlin's illicit finance and trading network and fuelling military campaigns in Ukraine.[117]

Evidently, illicit payments can occur at any stage of the IWT supply chain, including licensing, production, manufacturing, transit, taxation, export and the laundering of criminal proceeds, and involve licit and illicit entities, including OCGs, and state and hybrid threat actors.[118]

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111. The Antibalaka are a coalition of largely Christian armed militias, originating from village vigilante groups, who succeeded in removing the Séléka and the CAR President, Michel Djotodia, from Bangui in 2014. See Tony Blair Institute for Global Change, 'What is the Antibalaka?', 7 September 2016, <https://institute.global/insights/geopolitics-and-security/what-antibalaka>, accessed 25 May 2025.
112. Global Witness, 'Blood Timber', 15 July 2015, <https://globalwitness.org/en/campaigns/forests/blood-timber/>, accessed 15 May 2025.
113. Browne, Kelly and Pilgram, 'Illegal Logging in Africa'.
114. Fergus O'Leary Simpson et al., 'The Environmental Toll of the M23 Conflict in Eastern DRC (Analysis)', *Mongabay,* 7 March 2025, <https://news.mongabay.com/2025/03/the-environmental-toll-of-the-m23-conflict-in-eastern-drc-analysis/>, accessed 9 June 2025.
115. Daan van Uhm, Milou Tjoonk and Eliode Bakole, 'Business as Usual? Illegal Charcoal and Timber Trade in Eastern DRC', Global Initiative Against Transnational Organized Crime (GITOC), December 2022, pp. 19–22, <https://globalinitiative.net/analysis/charcoal-timber-trade-eastern-drc-congo/>, accessed 7 April 2025.
116. Alexandre Jaillon et al., 'Everything that Moves will be Taxed': The Political Economy of Roadblocks in North and South Kivu', IPIS, 6 December 2017, <https://ipisresearch.be/publication/everything-moves-will-taxed-political-economy-roadblocks-north-south-kivu/>, accessed 15 May 2025.
117. David Lewis and Tena Prelec, 'New Dynamics in Illicit Finance and Russian Foreign Policy', Serious Organised Crime and Anti-Corruption Evidence Research Programme Research Paper No. 17, University of Birmingham, August 2023, <https://www.socace-research.org.uk/publications/new-dynamics-russian-iff-rp17>, accessed 7 April 2025.
118. Browne, Kelly and Pilgram, 'Illegal Logging in Africa'.

Box 2: Case Study – Wagner Timber Extraction in the CAR and Cameroon

Various investigations have uncovered the use of front companies by the notorious Russian mercenary Wagner Group to extract vast quantities of timber from the CAR using lucrative forestry permits received from the government in return for military support.[119] In early 2021, the Forces armées centrafricaines (CAR government armed forces) launched military operations in the Lobaye region to expel rebel groups. Numerous sources indicated the involvement of Wagner mercenaries in the offensive.

A few weeks after the joint offensive, a company called Bois Rouge was granted a forestry exploration permit for the Ngotto forest in Lobaye, and extractive activities soon began. In parallel, customs records and photographic evidence showed large amounts of Russian heavy machinery being imported into the CAR by Bois Rouge.

While purportedly locally owned, Bois Rouge has multiple links to the late Yevgeny Prighozin, Wagner's former leader. Associates of Prighozin worked for Bois Rouge and the company has carried out numerous financial transactions with other Wagner-controlled companies. Wagner mercenaries have been spotted in the Ngotto area being logged by Bois Rouge and have provided security along export routes from Bangui to Cameroon.

A network of companies with links to Wagner has been identified in the CAR and beyond. Wagner's record of using such front companies to secure access to natural resources through illegal and irregular means has led to international sanctions by the UK, the US and some EU countries, among others, for Wagner and all associated entities, including Bois Rouge.

119. All Eyes on Wagner, 'Come Follow the Redwood Trees: Tracking Wagner's Forestry Business in CAR', <https://alleyesonwagner.org/2022/07/26/come-follow-the-redwood-trees-tracking-wagners-forestry-business-in-car/>, accessed 9 June 2025; Mathieu Olivier, 'At the Heart of the Wagner System, from Douala to Bangui', *Africa Report*, 16 August 2022, <https://www.theafricareport.com/231760/at-the-heart-of-the-wagner-system-from-douala-to-bangui/>, accessed 9 June 2025; Julia Stanyard, Eleanor Beevor and Thierry Vircoulon, 'Port of Call: Regional Illicit Flows Through Douala, Cameroon', GITOC, May 2024, <https://globalinitiative.net/analysis/port-of-call/>, accessed 7 April 2025.

Bois Rouge and other Wagner-linked entities use international supply chains to export the timber, as well as to import associated equipment. Douala in Cameroon is the most accessible port from the CAR and has been shown to be vulnerable to exploitation by Bois Rouge and Wagner. Based on the area covered by the exploitation permit and timber pricings found on Alibaba.com, Bois Rouge is estimated to have sold up to $890-million worth of timber on behalf of Wagner.

Financial Intelligence Units Survey Analysis

This chapter presents the results and analysis of the regional FIU survey, triangulating the findings in the context of the wider literature on financial investigation of organised crime, including IWT.

Why 'Follow the Money'?

Financial investigations are a customary and recognised tool for combating serious organised crime (SOC). This approach, underpinned by a desire to illuminate the IFFs driving criminal activity, provides a crucial mechanism for identifying middle- and high-level actors within illegal supply chains. The benefits of this approach are far reaching, from informing more disruptive law enforcement techniques to providing novel avenues for prosecution.

Experts have long recognised the involvement of OCGs in international flows of IWT. Accordingly, there have been calls for a greater understanding of the financial dimensions of IWT, including mapping onward financial and logistical chains.[120] In 2020, the FATF published a flagship report on ML and IWT. The report showcased a concerning and global 'lack of focus on the financial aspects' of increasingly sophisticated and transnational IWT.[121] It further highlighted an absence of routine collection, development and dissemination of financial information – a prerequisite for any successful financial investigation.[122]

FATF-endorsed and RUSI-led research published in 2021 reflected similar findings for the West and Central Africa regions, showcasing a widespread lack of knowledge on, and capability to counter, the financial dimensions of IWT.[123] Without financial investigations, enforcement efforts are largely restricted to targeting low-level

120. Maguire and Haenlein, 'An Illusion of Complicity'.
121. FATF, 'Money Laundering and the Illegal Wildlife Trade', p. 5.
122. *Ibid.*, p. 32.
123. Reid and Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa'.

offenders. This approach is unlikely to meaningfully disrupt SOC activity – given the replaceability of low-level offenders – and simultaneously risks encouraging the application of excessively punitive measures against offenders situated within already vulnerable communities.[124]

Financial Intelligence Units Survey Results

This section analyses the results of the 25-question survey distributed and responded to either partially or in full by each of GABAC's seven member FIUs.[125] Conducted in March–April 2024, the survey collected information on respective FIU awareness, capacities and experiences in wildlife-related cases. Where necessary, FIUs were approached for follow-up interviews to complement survey responses. Key findings and provisional recommendations derived from the research were presented in-person to all seven FIUs – in addition to regional law enforcement bodies and observers – at the GABAC 21st plenary meeting, for further discussion and validation.

Key Findings

1. Central African FIUs considered IWT an issue and recognised IWT-related IFFs as a risk.

When asked to self-assess their exposure to IWT, six of the seven FIUs (Cameroon, CAR, Chad, DRC, Gabon and RoC) reported wildlife crime to be an 'important problem', the highest level of the proposed options, with only Equatorial Guinea classifying it as a 'problem'. When asked to classify themselves as a source, transit or destination country for IWT, all seven FIUs considered their jurisdiction to be a source country for IWT products, with the DRC and Cameroon's FIUs further identifying themselves as destination countries for wildlife contraband. Only the RoC identified itself as a source and transit country for IWT products. Although these assessments reflect a strong baseline of awareness, the lack of understanding of their role as transit countries is inconsistent with the extensive evidence of transboundary trafficking routes across most of the region, as discussed in Chapter One.

Evidently, there is awareness of the financial dimensions of IWT among FIUs – a marked shift compared with previous studies. While there is no discrete data on all seven FIUs for comparison, a 2017 UNODC/Asia-Pacific Group on Money Laundering (APG) assessment examined enforcement capacity to address IWT-related IFFs across 41 jurisdictions in multiple regions. As none of the seven Central African FIUs

124. Anne-Marie Weeden and Nicholas Pamment, '"You Walk on Glass if You are in That Space": Risks and Harms of Corruption in Wildlife Justice Pathways in Uganda', *Journal of Economic Criminology* (Vol. 6, 2024).
125. All seven FIUs, in varying degrees of detail, provided responses to at least half of the survey's questions. Some countries' surveys received input from other national agencies involved in financial crime and wildlife crime, such as justice and wildlife ministries.

responded to the UNODC/APG study, the report speculated that 'low prioritisation of wildlife crime' was a likely factor.[126] A 2021 study by the Egmont Group suggested 45% of countries surveyed in West and Central Africa, including five GABAC member states, considered their IWT-related ML/TF risk exposure either 'low' or 'unknown'.[127]

The level in awareness, as reflected in the research for this paper, correlates with efforts to strengthen understanding of environmental crimes in the context of ML/TF risks.[128] Recommendations issued by the FATF in 2020 and the Egmont Group in 2021 urged FIUs to assess IWT-related exposure in their risk assessments.[129] Six GABAC member states have since completed their NRAs,[130] with assessments of ML/TF risk related to environmental and extractive sectors evident in the publicly available reports. Cameroon, for instance, recognises the high risk of IWT resulting in significant loss of state revenues.[131] Likewise, the DRC considers the country's vulnerability to wildlife-related ML/TF to be 'high', noting the country's elevated corruption risk.[132] Although their NRAs were not publicly available, other FIUs confirmed to this paper's authors that their assessments encompassed wildlife and environmental crime risks. For instance, the CAR reported that IWT was included in its NRA, both in terms of criminal ML risk and the financing of 'rebel factions'. Elsewhere, regional experts familiar with NRA processes confirmed that all six of the completed NRAs self-evaluated the ML/TF risk of IWT and related environmental crimes,[133] which was further reflected in the corresponding MERs (Table 1). Additionally, GABAC recently committed to producing a regional typology report on environmental crime ML/TF risks, further consolidating this increased prioritisation.[134]

126. APG and UNODC, 'Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows', p. 10, <https://ocm.iccrom.org/documents/enhancing-detection-investigation-and-disruption-illicit-financial-flows-wildlife-crime>, accessed 7 April 2025.
127. ECOFEL, 'Financial Investigations into Wildlife Crime', 3 March 2021, p. 40, <https://ecofel.org/financial-investigations-into-wildlife-crime-report/>, accessed 7 April 2025.
128. ECOFEL, 'Financial Investigations into Wildlife Crime'; FATF, 'Money Laundering and the Illegal Wildlife Trade'.
129. ECOFEL, 'Financial Investigations into Wildlife Crime', p. 64.
130. At the time of writing, Chad's NRA is forthcoming, pending final validation.
131. FATF, Cameroon, 'National Risk Assessment', validated 2021, pp. 26–28, <https://www.fatf-gafi.org/en/countries/detail/Cameroon.html>, accessed 7 April 2025.
132. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Democratic Republic of Congo (DRC): Mutual Evaluation Report', April 2021, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Mer-drc-2021.html>, accessed 7 April 2025.
133. Authors' interview with regional policymaker, online, 6 December 2024; authors' interview with representative of regional FIU, online, 26 November 2024; authors' interview with representative of regional FIU, online, 10 December 2024.
134. Announced to the authors by the GABAC Secretariat during GABAC's 21st Plenary Session in Libreville, Gabon, 22–27 September 2024 and subsequently reconfirmed by GABAC.

Table 1: Summary of IWT ML/TF Risk Assessment in GABAC Member MERs

GABAC Member State	NRA/MER IWT ML/TF Assessment
Cameroon	Identifies the exploitation of wildlife resources, including illegal logging and wildlife trafficking, as major criminal threats that generate enormous illicit revenues.[135]
CAR	Recognises trafficking in wildlife, wood products and poaching as prevalent criminal activities.[136]
Chad	Highlights that poaching, illegal exploitation and trafficking of wildlife, plant and fishery products are crimes that pose a significant TF risk.[137]
DRC	Acknowledges its vulnerability to illegal exploitation of natural resources and considers poaching and trafficking of protected wildlife and forest species a criminal offence.[138]
Equatorial Guinea	Acknowledges the existence of wildlife crime and mentions the transit of IWT products through the country as an illegal activity.[139]
Gabon	Cites illegal exploitation of forest resources and the trafficking of wildlife products sourced by poachers as crimes that constitute the country's main ML threat.[140]
RoC	Considers the exploitation of natural resources and wildlife crime as key criminal activities, including IWT and illegal harvesting involving forest species.[141]

2. All FIUs confirmed the criminalisation of IWT, demonstrating knowledge of wildlife enforcement stakeholders and seizures. Six of the seven FIUs identified IWT as a predicate offence.

Several GABAC members have pursued reforms to wildlife legislation, which is reflected in their responses to the survey. For example, Cameroon's new 2024 forestry and wildlife law changed the penalties for wildlife offenders, increasing the maximum

135. Republic of Cameroon, 'Law No. 2024/008 of 24 July 2024 to Lay Down Forestry and Wildlife Regulations', 2024, Section 173.
136. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Central African Republic Mutual Evaluation Report', November 2023, pp. 25, 27, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/CAR-MER-2023.html>, accessed 7 April 2025.
137. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Republic of Chad Mutual Evaluation Report', July 2023, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Mer-Chad-2023.html>, accessed 7 April 2025.
138. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Democratic Republic of Congo (DRC): Mutual Evaluation Report'.
139. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Equatorial Guinea Mutual Evaluation Report', November 2024, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Equatorial-Guinea-MER-2024.html>, accessed 7 April 2025.
140. GABAC, 'Rapport d'Evaluation Mutuelle' ['Mutual Evaluation Report'], July 2023, <https://gabac.org/wp-content/uploads/2023/07/MESURES_LUTTE_CONTRE_LE_BLANCHIMENT_DE_CAPITAUX_ET_LE_FINACEMENT_DU_TERRORISME_REPUBLIQUE_GABONAISE-1.pdf>, accessed 7 April 2025.
141. GABAC, 'Anti-Money Laundering and Counter Terrorist-Financing Measures: Democratic Republic of Congo (DRC): Mutual Evaluation Report'.

sentence to up to 20 years' imprisonment.[142] Equatorial Guinea bolstered its capacity to counter IWT and associated offences by establishing a special prosecutor for environmental crime in 2022.[143]

Only Equatorial Guinea's FIU indicated that IWT did not constitute a predicate offence in their jurisdiction.[144] This response is at odds with the binding 2016 CEMAC Regulation No. 01, which explicitly denotes 'environmental crime' as a predicate offence.[145] As stated by a CEMAC directive, the AML/CTF standards in the 2016 regulation must be transposed into member states' national legislation, thus applying to all GABAC members except for the DRC, which is not part of CEMAC. However, the DRC has also reinforced AML/CTF legislation through the enactment of Law 22/068 in 2022, which identifies 'criminal infractions against the environment' as a predicate offence.[146]

3. Cooperation between FIUs, wildlife authorities and other enforcement agencies is rare and non-systematic in most jurisdictions.

As of April 2024, Chad and the CAR were the only GABAC countries to report interagency collaboration on an IWT investigation. In the RUSI survey, Chad's FIU cited at least one instance of such collaboration, which involved information exchanges with Chad's Directorate General of Forest and Fauna Protection. The CAR's FIU reported having worked with the country's Ministry of Waters, Forests, Hunting and Fishing, but provided little further detail. The remaining five member states reported no such form of collaboration on matters relating to IWT. One FIU specifically lamented the lack of an inter-agency framework or established intelligence-sharing mechanisms.

Interagency collaboration on IWT remains a significant challenge beyond the financial aspects of a case, inhibiting enforcement outcomes in the region. Territoriality, disagreements over mandates and – in some jurisdictions – the legal option for settling cases administratively rather than via prosecution (known as 'settlement' or

142. Republic of Cameroon, 'Law No. 2024/008', Section 173.
143. Republic of Equatorial Guinea, 'Código Penal 4/2022'.
144. A predicate offence is a criminal act that provides the basis for other crimes, such as money laundering. According to the UN Convention against Transnational Organized Crime, a predicate offence includes any offence from which proceeds are generated, encompassing 'all serious crimes'. See UNODC, *United Nations Convention Against Transnational Organized Crime and the Protocols Thereto* (Vienna: United Nations, 2024), p. 8.
145. Communauté Economique et Monétaire de l'Afrique Centrale/Economic and Monetary Community of Central Africa (CEMAC), 'Regulation No.01/CEMAC/UMAC/CM of 2016 on Prevention and Repression of Money Laundering and Terrorist Financing in Central Africa'; Chapter 1, Article 1, Section 19 on Designated Categories of Offences includes environmental crime.
146. DRC, 'Loi No. 22/068 du 27 December 2022 Portant Lutte Contre le Blanchiment de Capitaux et le Financement du Terrorisme et de la Prolifération des Armes de Destruction Massive' ['Law No. 22/068 of 27 December 2022 on the Fight against Money Laundering and the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction'], *Official Journal of Democratic Republic of the Congo* (11 January 2023), Section 4, Article 11, Point 12, <https://www.droitcongolais.info/files/322.12.22-Loi-du-27-novembre-2022_Blanchiment-et-terrorisme.pdf>, accessed 7 April 2025.

'negotiation')[147] disincentivise interagency dialogue. The vast territories and lack of infrastructure in several jurisdictions – exacerbated by instability and the presence of armed groups – further hampers information and intelligence sharing between agencies.[148] The reliance on hard copies for almost all government data, including case files, warrants and other information, creates further challenges.[149] Real-time information sharing is therefore rare, and what does exist is informal, with information often exchanged via personal messaging platforms rather than official channels.[150] Even in cases involving a single agency, the time and cost of investigating and prosecuting cases can be prohibitive.

The lack of cooperation between other agencies and the FIUs is compounded by the relative infancy of the latter, and the novelty of financial crime to national wildlife enforcement agencies. Although recent interventions appear to be improving awareness of linkages between IWT and ML risks across financial intelligence actors, agencies tasked with wildlife enforcement lag further behind. MERs repeatedly found deficiencies in wildlife agencies' awareness of national FIUs, ML/TF risks and AML/CTF legislation. The CAR's 2023 MER described the wildlife administration and other specialist agencies as 'completely unaware' of their reporting obligations to the FIU.[151] In Cameroon, the 2022 MER suggested that the country's Ministry of Forestry and Wildlife (MINFOF), which is responsible for wildlife enforcement, had lower awareness than other authorities with similar powers of investigation.[152]

Central African countries have sought to remediate these issues through National Action Plans, AML/CTF strategies and stakeholder dialogue, including workshops and profile-raising efforts around the role of FIUs, aiming to encourage greater collaboration, often supported by NGOs.[153] Additionally, some countries have created formal interagency structures on ML/TF policy and investigations, which are inclusive of wildlife authorities. However, a question remains as to the functionality of these structures. For example, the CAR's interagency committee on AML/CTF coordination has been characterised as largely inoperable. Since its creation in 2018, the committee has suffered from interagency territoriality, resource shortages and staff capacity

147. In some jurisdictions, 'negotiation' provides for out-of-court settlement between an offender and the wildlife authority in which a financial penalty is agreed, permanently ending investigations into certain eligible offences.
148. Authors' interview with representative of regional law enforcement, online, 26 November 2024; authors' interview with former representative of NGO and regional law enforcement, online, 21 November 2024; authors' interview with representative of regional NGO, online, 7 June 2024.
149. Authors' interview with legal expert, online, 6 December 2024.
150. Authors' interview with regional law enforcement official, online, 19 August 2024.
151. GABAC, 'Central African Republic Mutual Evaluation Report', p. 65.
152. GABAC, 'Anti-Money Laundering and Counter-Terrorist Financing Measures: Cameroon Mutual Evaluation Report', March 2022, p. 11, <https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/GABAC-Mutual-Evaluation-Report-Cameroon-2022.pdf.coredownload.inline.pdf>, accessed 7 April 2025.
153. Authors' interview with representative of regional FIU, online, 26 November 2024; authors' interview with former representative of regional FIU, online, 26 November 2024; authors' interviews with representatives of regional FIU, online, 11 October 2024.

issues.[154] Other committees are either in their infancy or lack operational components, relying on infrequent meetings rather than providing an ad hoc means for collaboration.[155]

4. Despite good awareness and strong legislative frameworks among Central African FIUs, financial investigations of IWT cases are seldom conducted in practice.

In the survey responses, only two GABAC member states reported having received at least one STR related to IWT. Both the Cameroon and DRC FIUs reported receipt of between five and 10 STRs between 2019 and 2024. Only Cameroon indicated involvement in subsequent investigations. However, none of the STRs investigated yielded convictions for ML or other financial crimes associated with the predicate offence. As of January 2025, no successful convictions of wildlife criminals for financial crimes in Central Africa had been identified by the authors of this paper.

Although the survey results reflect FIU recognition of wildlife-related financial crime as a threat and identify legal frameworks for tackling it, survey responses suggested a near total non-operationality of parallel financial investigations by enforcement agencies into wildlife offences. The MERs for each GABAC member further confirm the scarcity of such investigations, as seen in Table 2.

Table 2: Summary of IWT-Related Financial Investigations in GABAC Member MERs

GABAC Member State	MER
Cameroon	No parallel investigations carried out; judicial police focus on predicate offences.
CAR	Inadequate identification of ML cases from predicate offences and no systematic use of parallel investigations.
Chad	Authorities may investigate environmental crimes but do not address the ML aspect.
DRC	No STR submissions relating to environmental crime and no mention of wildlife crime in NRA, despite being a major predicate offence.
Equatorial Guinea	No parallel financial investigations into predicate offences, either by the FIU or by the national prosecuting authority.
Gabon	Widespread seizures and confiscations of wildlife products, yet no systematic financial investigations into these cases.
RoC	The competent courts are not well structured and lack capacity and resources to conduct ML/TF investigations.

Source: The authors, based on analysis of each country's latest MER.

154. GABAC, 'Central African Republic Mutual Evaluation Report'; authors' interview with regional policymaker, online, 6 December 2024.
155. Authors' interview with regional policymaker, online, 26 November 2024; authors' interview with representative of regional FIU, online, 6 December 2024.

The disconnect between FIU awareness of IWT ML risks and enforcement agency action on financial investigations of IWT across Central Africa reflects an implementation gap between policy and practice. Although the FIUs are critical to developing financial intelligence, mandates for investigations, prosecutions and asset recoveries lie with other national agencies. In addition, STR reporting is the responsibility of both public and private sector actors. The FIU survey respondents do not arrest suspects or prosecute cases, but are mandated to analyse and develop financial intelligence, and pass this on to the competent authority for follow-up. As such, enforcement outcomes are dependent on complex interagency enforcement and criminal justice systems – as well as the members states' political appetite for investigating organised, transnational elements of IWT.

The lack of financial investigations into IWT offences has repercussions beyond failures to disrupt offenders or protect state revenues. The lack of financial investigations leads to a data deficit in financial intelligence, weakening the granular understanding of IWT-specific operating methods for ML and TF across all entities. This is evident from survey responses, with only two FIUs claiming knowledge of the operating methods of wildlife-related IFFs.

5. Cross-border cooperation is rarely pursued by FIUs in transboundary investigations.

Adopted in 2015, the Gabon-sponsored UN Resolution 69/314 urged IWT supply and demand countries to strengthen their response through more effective international cooperation, recognising IWT as an 'increasingly sophisticated form of organized crime'.[156] A key element of this sophistication has been the internationalisation of IWT and its criminal actors. Notwithstanding the domestic bushmeat and medicinal markets, many IWT supply chains span multiple countries. The transnational nature of IWT thus necessitates a coordinated international response.

Despite this, survey responses indicated low levels of international cooperation on IWT among FIUs. Only two GABAC members, Cameroon and the RoC, reported making a request for information to a foreign FIU on a wildlife case. Only Cameroon indicated having received such a request from a foreign FIU on an IWT investigation. Considering the low levels of domestic interagency cooperation and the non-operationality of wildlife-related financial investigations, which would result in limited demand for international intelligence, this is arguably unsurprising.

According to the GABAC member states' latest MERs,[157] sufficient legal provision exists for them to support various forms of international cooperation, including information sharing and extradition. In addition, the 2016 CEMAC Regulation No. 1 dictates that a

156. UN General Assembly Resolution 69/314, A/Res/69/314, 19 August 2015, pp. 1–2.
157. Information pertaining to Equatorial Guinea's Mutual Evaluation is available in provisional form pending publication of the final report.

member state FIU ‘may communicate information it holds on amounts or operations that appear to involve the laundering of the proceeds of a criminal activity … either at [another FIU’s] request or [on] its own initiative’.[158] The regulation stipulates that this requirement falls under the Charter of the Egmont Group,[159] which provides free information exchange between FIUs, of which Cameroon, the RoC, Chad and Gabon are members.[160] Although Equatorial Guinea and the DRC are not Egmont Group members, they have regional and bilateral treaties enabling mutual legal assistance and cross-border collaboration. In addition to peer-to-peer sharing between FIUs, both FIUs and enforcement agencies have access to non-government sources of information. Initiatives such as the Trade in Wildlife Information eXchange (TWIX) provide secure platforms for regional law enforcement, including all GABAC member states, to share and receive IWT-related intelligence,[161] although the use of these tools by FIUs was not measured in RUSI’s survey. Other interventions, such as the United for Wildlife Financial Taskforce, host regional forums for dialogue on IWT typologies, sharing strategic resources with public and private sector actors, as well as NGOs, which are working to combat IWT.[162]

158. CEMAC, ‘Regulation No.01/CEMAC/UMAC/CM of 2016 on Prevention and Repression of Money Laundering and Terrorist Financing in Central Africa’, Section III, Article 82.
159. Egmont Group, ‘Egmont Group of Financial Intelligence Units Charter’, July 2013 (revised July 2023), 3.1.A, <https://egmontgroup.org/wp-content/uploads/2021/09/Egmont-Group-Charter-Revised-July-2023-Abu-Dhabi-UAE.pdf>, accessed 7 April 2025.
160. Egmont Group, ‘Members by Region’, <http://egmontgroup.org/members-by-region/>, accessed 26 February 2025.
161. TRAFFIC, ‘Trade in Wildlife Information eXchange (TWIX): Promoting Information-Sharing and Cooperation to Reduce Illegal Wildlife Trade in Africa’, 2024, <https://www.traffic.org/site/assets/files/3792/africa-twix-leaflet-2021-en-1.pdf>, accessed 26 February 2025.
162. United for Wildlife, ‘Resource’, <https://unitedforwildlife.org/resources/>, accessed 5 August 2025.

Towards Mainstreamed Financial Investigations

This chapter explores the barriers and contexts that inhibit successful financial investigations of IWT cases in Central Africa jurisdictions. This includes legal contexts limiting enforcement actors to making arrests only when offenders are in the act of committing a crime, referred to in national statutes and by respondents as the 'flagrante delicto' problem,[163] as well as the pervasive issue of corruption.

Although progress has been made in wildlife-related IWT threat awareness and legislation, the RUSI survey in this paper paints a concerning picture of a near-total lack of related financial investigations across the region. These shortcomings are by no means unique to Central Africa, and survey responses from GABAC member states mirror vulnerabilities identified in other jurisdictions, namely:

- No jurisdictions systematically conduct financial investigations into IWT cases.
- IWT investigations overwhelmingly start and end with the seizure.
- FIUs are not systematically informed of financial crime risks linked to wildlife cases.
- Financial crime charges are rarely included in IWT prosecutions.
- International cooperation is rare in addressing transnational wildlife-related IFFs.[164]

Despite this, survey results and analysis suggest that Central Africa benefits from some relative strengths, compared with other regions, namely:

- Adequate and largely harmonised national and regional legal AML/CTF frameworks.
- FIU recognition of IWT as a predicate offence and awareness of related ML/TF risks.

It is important to contextualise these survey findings using qualitative insights on specific regional challenges and systemic vulnerabilities. These were obtained through interviews with FIU analysts, regional enforcement actors, ministerial officials and

163. Interviews with law enforcement experts, online, June 2024–April 2025. For an example of the use of 'in flagrante delict'o in a national statute, see Republic of Cameroon, 'Law No. 2024/008', Sections 156 and 179.
164. See APG and UNODC, 'Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows', p. 6.

civil society actors. Factors influencing the mainstreaming of financial investigations in Central Africa are complex, interconnected and multidimensional, and can be explored under two recurring themes: the legal 'flagrante delicto' problem, and the pervasive phenomenon of corruption.

The 'Flagrante Delicto' Trap

The wider, systemic obstacles to mainstreaming financial investigations in Central Africa are exemplified in the findings of a TRAFFIC report on wildlife case outcomes in Cameroon from 2010 to 2022. Of a total 675 cases, 55% related to 'illegal possession, circulation or trading' with a further 25% and 14% representing 'poaching' and illegal 'capture', respectively.[165] These figures demonstrate the enforcement tendency to target lower-level offenders engaged in poaching and small-scale wildlife crimes. Individuals familiar with IWT networks spanning Cameroon, the DRC, the RoC and the CAR observed an enforcement focus on intercepting seizures or apprehending poachers within the parks, rather than 'following the money' to determine which demand actors benefit from the supply chains initiated via such entry-level crimes.[166]

In Cameroon, the law stipulates that wildlife offenders must be caught in the act of committing an offence, thus limiting MINFOF's officers to cases where offenders are caught in possession of protected species or in the act of harvesting them.[167] This narrowness is reflected in Cameroon's national wildlife crime strategy, which explicitly labels poaching as an organised crime, yet acknowledges the limitations of investigative capacities and the lack of a strategy targeting the organised elements involved in driving IWT.[168] Meanwhile, the CAR's strategy does not include investigations into criminal networks, but rather focuses on patrols, raids and checkpoints.[169]

165. TRAFFIC, 'Analysis of Wildlife Court Cases in Cameroon', p. 23.
166. Authors' interview with regional law enforcement expert, online, 29 November 2024.
167. Republic of Cameroon, 'Law No. 2024/008', Sections 156 and 179.
168. Ministry of Forestry and Wildlife Cameroon, 'National Anti-Poaching and Wildlife Crime Strategy: 2020–2030', p. 14, Box 3, <https://cm.chm-cbd.net/documents/national-anti-poaching-and-wildlife-crime-strategy>, accessed 7 April 2025.
169. Ministère des Eaux, Forêts, Chasse et Pêche (MEFCP) [Ministry of Water, Forestry, Hunting and Fishing] CAR, 'Stratégie Nationale et Plan d'Action de Lutte Contre le Braconnage et la Criminalité Faunique en République Centrafricaine' ['National Strategy and Action Plan to Combat Poaching and Wildlife Crime in the Central African Republic'], 2018, pp. 31–36, <https://sherloc.unodc.org/cld/uploads/res//treaties/strategies/central_african_republic/caf0001s_html/Strategie_LAB_editee.pdf>, accessed 7 April 2025.

Other issues amplify this enforcement reflex. The DRC's wildlife crime investigations have been criticised as routinely 'superficial',[170] and the 'insufficiency' of the country's police makes casework for environmental crimes challenging.[171] Inadequate investigations inhibit provision of evidential case files to prosecutors, who may then be hampered in securing convictions.[172] Furthermore, very few wildlife investigators – or indeed other types of enforcement officers – across the region are trained in the recognition and investigation of financial crimes. Although capacity-building interventions exist, training remains non-systematic and short term.

Wildlife authorities in the region are also constrained by their limited resources. In at least two GABAC member states, the law compels the arresting officer to be present for the trial. However, courts are often based in regional capitals – far from the rural, protected areas where the officer is likely based – and the officer is responsible for related travel expenses, which often exceed daily allowances fourfold.[173] Given the longwinded nature of judicial processes in the region – with widespread delays owing to incomplete case files, absconding suspects or corruption – trials become lengthy and expensive endeavours for wildlife authorities and their staff, further disincentivising them from developing investigations for anything beyond a simple flagrante delicto case.[174] Other disincentives, rooted in the many forms of corruption – further explored in the next section – complete the flagrante delicto trap.

In turn, enforcement and justice actors, unlike their respective FIUs, remain largely unaware of the financial dimensions of IWT. Investigations into higher-value forms of IWT and associated IFFs are unlikely to be triggered, leaving investigators and prosecutors focused on the lowest hanging fruit. Consequently, IWT remains low risk and high reward for organised crime and corrupt actors situated higher up the supply chain, and high risk, low reward for subsistence poachers and local transporters.[175] One interviewee compared these impacts of the flagrante delicto trap as similar to arresting drug users as the principal drug enforcement strategy.[176]

170. Ngeh Chiambeng Paulinus et al., 'La Répression des Crimes Fauniques en RDC: Comment Améliorer les Poursuites Judiciaires?' ['Combatting Wildlife Crimes in the DRC: How Can Prosecutions be Improved?'], TRAFFIC, December 2018, p. 31, Section 3.1.2.1, <https://www.traffic.org/publications/reports/la-repression-des-crimes-fauniques-en-rdc-fr/>, accessed 7 April 2025.
171. Genèse Bibi Ekomene, 'Compétences des Juridictions Congolaises a l'Égard des Crimes Environnementaux' ['Jurisdiction of Congolese Courts Regarding Environmental Crimes'], *KAS African Law Study Library* (Vol. 5, No. 4, 2018), p. 631.
172. Paulinus et al., 'La Répression des Crimes Fauniques en RDC' ['Combatting Wildlife Crimes in the DRC'], p. 31.
173. Authors' interview with regional legal expert, online, 6 December 2024.
174. Authors' interview with regional legal expert, online, 9 December 2024; authors' interview with academic, online, 24 May 2024; authors' interview with representative of NGO, online, 11 April 2024; TRAFFIC, 'Analysis of Wildlife Court Cases in Cameroon'.
175. William Robert Avis, 'Criminal Networks and Illicit Wildlife Trade', K4D Helpdesk Report 150, Institute of Development Studies, 2017, <https://www.gov.uk/research-for-development-outputs/criminal-networks-and-illicit-wildlife-trade>, accessed 7 April 2025.
176. Authors' interview with representative of NGO, online, 2 December 2024.

However, the wildlife authorities' lack of specialised financial expertise or proactive mandates does not prevent wider, financial investigations into IWT cases. Rather, it points to the opportunity for wildlife agencies to be positioned as 'first responders' to wildlife-related financial crime, and leverage interagency collaboration to harness agencies' interlocking mandates and skillsets. However, as indicated in the FIU survey, interagency collaboration within each jurisdiction is currently either patchy or absent, since wildlife authorities do not routinely trigger financial investigations by approaching FIUs with information or requests.

Current enforcement efforts against IWT-related financial crime are therefore inhibited by a combination of factors and incentives which manifest themselves through a disproportionate focus on low-level offenders. These inhibiting factors include strategic gaps, as well as a lack of legal mandates, capacity and resources, and interagency collaboration. Tackling these problems requires a holistic, whole-system response to override the flagrante delicto trap to ensure that initial arrests or seizures represent the beginning, rather than the end, of authorities' investigations.

Corruption

Corruption is well established as a criminal strategy for facilitating the IWT supply chains, with criminal actors exploiting weak governance to obtain fraudulent permits or customs declarations. However, corruption is also a key contributing factor to the predominance of the flagrante delicto reflex in Central Africa, as well as a major barrier to pursuing financial investigations into IWT, particularly for investigations of powerful wildlife offenders.

Financial investigations pose a threat to the vested interests of PEPs profiting from IWT insofar as they strike at the heart of the symbiotic relationship between ML, corruption and IWT. It is in this context that the 'quasi-absence' of parallel financial investigations for corruption and IWT offences in the region can be understood.[177] Where financial investigations may be launched, honest brokers face intrinsic risks investigating PEPs, particularly in authoritarian or fragile states where law enforcement and justice officials are vulnerable to undue influence or harm.[178]

In this way, corruption undermines effective enforcement efforts. Previous research conducted by RUSI in sub-Saharan Africa identified the role of corruption in impeding and undermining enforcement efforts.[179] In Central Africa, this form of corruption – stemming from PEPs and other influential persons, including corporate actors – is

177. Author interview with regional legal expert, Libreville, Gabon, 26 September 2024.
178. David Chaikin and J C Sharman, *Corruption and Money Laundering: A Symbiotic Relationship* (New York, NY: Palgrave Macmillan, 2009), p. 61.
179. Reid and Williams, 'Illegal Wildlife Trade and Financial Investigations in West Africa'.

widespread and takes many forms, namely bribery, patronage, coercion, intimidation, strategic legal action and violence.

The UNODC UN Anti-Corruption Toolkit urges governments to ensure 'plausible assurance that [whistleblowers] will actually be protected from consequences that may range from minor harassment to murder'.[180] Whistleblower laws exist in principle, yet confidence in them is low. One senior government official acknowledged the difficulty in attracting and retaining experts in financial crime and corruption, citing their perception of poor protections from PEP interference or retaliation.[181]

The threat of both personal and professional repercussions also exists within the private sector. In 2021, two senior banking officials from a bank in the DRC – which had been instrumental in exposing potential sanctions evasion and ML by the powerful mining magnate Dan Gertler – were sentenced to death in absentia and forced into exile.[182] The civil society and media organisations involved in the exposé also faced a flurry of expensive litigation. According to one FIU consulted for this study, compliance managers in a national bank reported concerns to the FIU regarding the risk of personal or professional repercussions in filing an STR.[183]

In this regard, the indirect and subversive effects of corruption are perhaps as pernicious in neutralising effective enforcement, intimidating whistleblowers and shrinking civic dialogue as they are in facilitating and fostering IWT. Whether at the point of interception, investigation or prosecution, wildlife offenders with influence or affluence can evade sanctions or deter further scrutiny by law enforcement.[184] This results in asymmetrical enforcement and entrenching the flagrante delicto trap, by prioritising low-level cases and suspects at the expense of investigating wider criminal networks and corrupt enablers.

180. UNODC, 'The Global Programme against Corruption UN Anti-Corruption Toolkit', February 2004, pp. 502–03, <https://www.unodc.org/documents/corruption/Toolkit_ed2.pdf>, accessed 7 April 2025.
181. Authors' interview with representative of regional anti-corruption authority, online, 26 November 2024.
182. Whistleblowing International Network, 'New Victory for PPLAAF and Whistleblowers Against Anti-Corruption', 27 September 2024, <https://whistleblowingnetwork.org/News-Events/News/News-Archive/New-Victory-for-PPLAAF-and-Whistleblowers-Against>, accessed 5 August 2025.
183. Authors' interview with representative of regional FIU, online, 12 December 2024.
184. David Aled Williams, 'Understanding Effects of Corruption on Law Enforcement and Environmental Crime', Targeting Natural Resource Corruption (TNRC), December 2019, pp. 2–3, <https://www.u4.no/publications/understanding-effects-of-corruption-on-law-enforcement-and-environmental-crime.pdf>, accessed 7 April 2025; Weeden and Pamment, 'You Walk on Glass if You are in That Space'.

Conclusion and Recommendations

This paper finds that despite growing recognition of IWT as an ML/TF threat among Central African FIUs, there has been very limited success in mainstreaming financial investigations into wildlife cases in the region. In practice, enforcement actors continue to target lower-level offenders due to the flagrante delicto trap, exacerbated by persistent resource constraints, a lack of financial crime understanding among wildlife authorities, and an absence of interagency and cross-border cooperation that could otherwise be leveraged to facilitate parallel financial investigations.

Critically, this paper also highlights corruption as a key obstacle to progress in tackling wildlife-related financial crime. Corruption neutralises enforcement and justice efforts by disincentivising honest brokers from pursuing financial leads, due to fears of reprisal by political and business elites benefitting from IWT. As a result, IWT cases rarely proceed beyond the point of seizure or low-level arrests, limiting opportunities for investigators to identify the true financial beneficiaries of the crime.

The following recommendations outline actionable pathways for Central African authorities to address these systemic challenges and move towards a more effective disruption of wildlife trafficking networks.

Recommendations

1. Focus financial investigation of IWT on critical nodes such as ports, harnessing high-capacity investigative agencies and authorities.

A lack of capacity, expertise and resources undermines the authorities' ability to investigate and prosecute financial investigations throughout the region. However, these shortcomings do not manifest themselves evenly along the criminal supply chain. Urban centres and key infrastructure, such as sea routes and airports, benefit from relatively stronger law enforcement and resource allocation. By prioritising both financial investigation training and enforcement interventions along critical junctures, law enforcement can intervene where OCGs are potentially most vulnerable, and where their illicit goods are most concentrated.

In addition, seaports and airports introduce another vulnerability to organised crime networks which financial investigators are uniquely placed to exploit: paperwork. The completion of a bill of lading, the payment of any dues, and the contracting of freight forwarders or shipping agents represent opportunities for financial investigators to identify suspects, illicit funds and associated crimes, such as tax evasion and customs fraud. Although documentation may be forged or otherwise fraudulently altered, the paper trail produced through sea and air travel represents a unique leverage point for authorities.

Consequently, the allocation of financial investigation resources should be prioritised at key transport nodes for IWT across the region, namely airports, seaports, border crossings and major highways. Through incisive placement of such resources, authorities can maximise their value and impact, creating opportunities to leverage enforcement actions and identify allies in key transit nodes for IWT contraband.

2. Promote the creation of bespoke SOPs tailored for use in financial investigations of IWT by all national actors.

National authorities should integrate learnings from existing resources, such as those produced by the FATF, Egmont Group, UNODC, Interpol and a variety of similar tools, such as the World Bank's *Asset Recovery Handbook*.[185] However, the transposition of international guidance alone is insufficient and can be at times counterproductive, as it fails to account for local variances and is less likely to result in local uptake. The principles from existing best practice guides must therefore be adapted to the specific law enforcement agency or the national context, ensuring guidance is concrete, concise and immediately applicable for financial investigators.

It is crucial for all law enforcement actors to understand financial investigation SOPs, not just actors specialised in leading financial investigations. Each agency or function should understand their role in instigating, supporting and collaborating on parallel financial investigations. To facilitate this wider distribution of responsibility, governments should produce and disseminate supplementary, distilled and simplified procedures for frontline officials. These procedures should outline the securing and transferring of vital, often overlooked, financial intelligence and evidence present at crime scenes which can, in turn, trigger a parallel financial investigation. These simplified procedures can notably be integrated within existing agency-specific or national SOPs which govern crime scene and information management.

185. Jean Pierre Brun et al., *Asset Recovery Handbook: A Guide for Practitioners* (Washington, DC: International Bank for Reconstruction and Development/The World Bank Group, 2011).

3. Promote locally-led, certified training on financial investigations at scale.

To scale the number of officers capable of triggering or conducting financial investigations, thereby ensuring sustainability and local uptake, the provision of training and the raising of awareness must be systematic. It should be locally led and delivered by recognised training institutions. This requires the prioritisation of 'train-the-trainer' activities to upskill local experts, as well as the integration of tailored SOPs into certified training curriculums. These can be delivered through institutional frameworks and national training colleges for the staff of relevant agencies, such as wildlife, customs and police agencies. As a result, investment in training will be implemented on a large scale, and professional development will be universal and sustainable.

This paper's survey results indicate that capacity-building interventions have, to date, successfully increased recognition of the existence and importance of wildlife-related IFFs among FIUs. However, granular knowledge of typologies and the transfer of such prioritisation, knowledge and skills to the enforcement agencies ultimately responsible for financial investigations have been limited in scope and are not sufficiently institutionalised. This is exacerbated by a high frequency of staff rotation in the relevant authorities across many jurisdictions. A more systematic approach is therefore required.

A more systematic approach is also particularly important considering the uncertainty around international financing or counter-wildlife crime initiatives in the region. Local and national training programmes must be resilient and designed to survive, should international partners reduce or eliminate funding for 'following the money'.

4. Integrate anti-corruption best practices into financial investigation training and SOP design, to safeguard investigations and investigators.

It is essential to insulate complex investigations from undue interference, and safeguard investigators and associated support staff, ensuring strictly controlled access to any wildlife-related financial investigation case conferences or case files. Furthermore, anti-corruption stakeholders, such as statutory anti-corruption entities, and anti-corruption strategies should be integrated into IWT interagency frameworks and financial integrity mechanisms. This should be combined with greater transparency and accountability. Effective outcomes of financial investigation would be facilitated by the courts of justice monitoring activities, the publication of case outcomes, and public access to beneficial ownership and company registry data. The delivery of training must similarly prioritise the inclusion of anti-corruption modules in criminal investigation curriculums, sensitising authorities and increasing resilience against the pervasive threat.

5. Strengthen the evidence base on IWT-related IFFs in Central African jurisdictions, and build support for greater public–private cooperation.

While recognition of the presence and severity of IWT-related ML/TF risk was strong among FIUs, it was weak among other enforcement actors, including wildlife agencies. Similarly, FIUs generally had little understanding of the detailed operating methods of wildlife-related ML payments and transactions. Research and analysis of wildlife-related IFFs should therefore be prioritised at the national FIU level, sending a clear message to national authorities and financial institutions on the importance and prevalence of the predicate offence, in turn equipping private and public sector actors with the information they need to act. Regular and systematic IWT ML threat assessments are key to tackling these intelligence gaps and addressing the reality that criminal typologies frequently evolve. These threat assessments would equip key stakeholders with current and actionable intelligence on an inherently dynamic threat.

Over time, closer public–private relationships could be achieved through the establishment of partnerships. In the shorter term, informal public–private engagement can help build support for an eventual partnership, by sensitising the financial sector to the scale of the IWT ML risk, and to the specific financial behaviours exhibited by organised crime actors and corrupt officials involved in plundering Central African wildlife.

Achieving meaningful deterrence by 'following the money' in IWT does not offer a quick solution. Strengthening the capacity of countries at risk of IWT-related IFFs takes time, resources, cooperation and political will. Other countries in the region, such as Malawi and South Africa, have only recently logged their first convictions of wildlife offenders for financial offences. However, the operationalisation of financial investigation techniques in IWT cases needs to happen swiftly if the enforcement of IWT is to target large-scale beneficiaries and corrupt facilitators of the crime, and avoid the disproportionate targeting of more opportunistic or subsistence actors. This paper contributes to the understanding of how financial investigations into IWT are constrained in Central Africa by both the spectre of corruption and the flagrante delicto trap, and provides practical strategies to overcome these challenges.

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