

Recent years have seen greater recognition that impacts of wildlife crime reach beyond species, undermining good governance, reducing opportunities for legitimate income generation and affecting local communities, the rural poor and national economies. Ending wildlife crime is rightly seen as a global development issue, addressed in the targets of the 2030 Agenda for Sustainable Development, and linked implicitly to corruption, illicit financial flows and rule of law. Nature-based tourism, for example, an economic powerhouse of many African States and worth an estimated USD30 billion per year, is directly threatened by wildlife crime.

According to the UN Office on Drugs and Crime (UNODC) and others, corruption is a key enabler of wildlife crime. It is prevalent along the entire wildlife value chain, including bribery of officials to issue permits or to turn a blind eye to illegal shipments. It is also a complex challenge. Rangers, for example, are essential to preventing poaching but equipment deficits resulting from procurement abuse may render them unable to patrol; some may also be bribed not to patrol. In both cases the result is the same, but potential solutions are very different.

EDITORIAL

A formal conversation around corruption in wildlife trafficking would have been unimaginable just a few years ago. There has been progress more recently: legal frameworks and conventions, for example the UN Convention Against Corruption (UNCAC) and the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions have come into being; and, the Sustainable Development Goals explicitly recognize corruption and illicit financial flows as obstacles to their achievement. The United Nations General Assembly resolution (2015), *Tackling Illicit Trafficking in Wildlife*, devotes three paragraphs to anti-corruption; outcomes of State-led processes, for example, the London, Kasane, Hanoi Conferences on Illegal Wildlife Trade, the Brazzaville and Forum on China—Africa Cooperation (FOCAC) declarations, all call upon countries to address corruption facilitating wildlife crime; and, in October 2016, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the principal global wildlife trade convention, adopted its first anti-corruption resolution.

References to “corruption” as an aggregate phenomenon make it appear impenetrable, causing paralysis compounded by fear (people who know or say too much are sometimes killed) or by an entrenched defensiveness in environmental organizations that “we work on conservation, not anti-corruption”. Unpacked, however, it becomes easier to understand, for example, judges giving lenient sentences, embezzlement of funds or bribery of an official, and thus easier to manage. But are conservation organizations building on progress in the policy fora to take up the challenge and incorporate anti-corruption strategies into conservation planning? Where anti-corruption elements are incorporated, are external experts sought to inform through an anti-corruption lens?

Uninformed or politically expedient interventions can give rise to greater harms: selective or misplaced enforcement interventions can increase injustices towards local communities and the rural poor, while more powerful actors such as those funding illicit operations are left untouched. A human rights perspective in addressing corruption facilitating wildlife crime is critical: pressure on police to demonstrate results may lead to increased bribes or to

increased human rights abuses against vulnerable communities, especially to those unable to pay bribes¹. The extrajudicial killing of people alleged to be poachers or of environmental human rights defenders is unfortunately by no means uncommon².

Frustrated with the siloed status quo, but cognizant that collaboration between the anti-corruption and wildlife conservation communities is critical to informed approaches, the Durrell Institute of Conservation and Ecology, Transparency International, and WWF convened a meeting in early 2016 to cement a new alliance of stakeholders from the anti-corruption, development and conservation communities—including TRAFFIC—forming the 3C Network: Countering Conservation-related Corruption. A collaborative research paper³ arising from this meeting highlighted the need for informed corruption risk assessments and tailored responses with iterative monitoring in order to build the evidence base.

Focusing analysis at the sectoral level is now recognized as essential, but cross-sectoral partnerships that reach beyond the natural living resource sectors also inform. Algorithmic assessments identifying irregular financial flows to disrupt human trafficking networks are equally applicable to wildlife trafficking; existing principles and policies of financial and regulatory bodies concerning money laundering could be adapted to make more explicit the links between wildlife crime and financial crime. Targeting financial beneficiaries of wildlife trafficking would help redress the disproportionate focus on low-level actors, bring into play a different suite of laws with harsher penalties and enable asset recovery. Approaching transnational environmental crimes through a financial crime lens is not new, but so far has gained more traction perhaps in the fisheries sector than in other wildlife sectors. Strengthened partnerships between public, civil society and the private sector would inform due diligence procedures, strengthen integrity along the value chain, and push corruption to the margins. There are promising signs of this approach in the transport sector, notably through The United for Wildlife Transport Taskforce Buckingham Palace Declaration⁴.

Unfortunately, the discourse around wildlife crime and corruption is often centred around Africa (elephants/rhinoceroses) and Asia (consumers) and takes place largely from a Western-centric perspective; it is something that happens “out there”. This is very convenient particularly in the fisheries and timber sectors where it overlooks illicit payments made by corporations in “the west” for access rights in developing countries. Addressing corruption requires us to look inwards in Europe and the Americas, to banking secrecy, tax havens, and to opportunities created by normative financial systems enabling investment of corrupt monies in the luxury goods and property markets.

Conservationists are not going to exchange conservation for anti-corruption targets, and nor should they. The line of engagement does however need to be redrawn, starting with an understanding of the anti-corruption landscape and the added value that conservation organizations bring to the table, informed through partnerships with anti-corruption specialists, development agencies, civil society and the private sector. In doing so, conservationists perhaps may find that they have more to contribute than they realize in terms of knowledge and data to inform the anti-corruption discourse.

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¹See Downs, F. (2013). *Rule of law and environmental justice in the forests: The challenge of 'strong law enforcement' in corrupt conditions*, U4 Issue. June 2013 No 6. U4 Anti-corruption Resource Centre, Chr. Michelsen Institute (CMI), Bergen, Norway. ²See Knox, J. (2016). *Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment*. Human Rights Council. A/HRC/34/49; ³See Williams, A., Parry-Jones, R. and Roe, D. (2016). *The resource bites back: Entry-points for addressing corruption in wildlife crime*. U4 Anti-corruption Resource Centre, Chr. Michelsen Institute (CMI), Bergen, Norway. ⁴the Declaration identifies 11 commitments that the transport industry can support where relevant, e.g. adopting zero tolerance policies to illegal wildlife trade, enhancing due diligence and risk assessment, etc.