



**Wildlife Justice
Commission**

Annual Report 2021

© **Wildlife Justice Commission**

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2517 JR The Hague
The Netherlands

www.wildlifejustice.org

Chamber of Commerce (KvK nummer): 62800248

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Join our fight against wildlife crime



Foreword

As the world enters a new stage of the COVID-19 pandemic while coming to grips with the tragedies and international implications of modern war, I feel it's important to acknowledge the high level of uncertainty in the coming period. Nevertheless, I look back proudly at 2021 as the Wildlife Justice Commission's most successful year since our founding in 2015 as we are sending a strong message that the risk/reward ratio for wildlife crime is changing.

2021 got off to a strong start; in February, during a joint operation with the Royal Thai Police and the U.S. Fish and Wildlife Service (USFWS) in Bangkok, a suspected high-level wildlife trafficker operating throughout the region, was arrested while attempting to supply a leopard cub to a Wildlife Justice Commission undercover operative. This arrest was the culmination of five years of investigations by our crime analysts and undercover team, as well as the great work of the Royal Thai Police and the USFWS.

In July and September, acting on intelligence from the Wildlife Justice Commission, Nigeria Customs Service (NCS) in Lagos arrested five suspects and seized 211 sacks containing

Olivia Swaak-Goldman

Executive Director,
Wildlife Justice
Commission



8.1 tonnes of pangolin scales, 9.6 kg of pangolin claws and 870 kg of ivory. All wildlife products were destined for export. This is the ninth largest seizure of pangolin scales since 2019, but crucially, the first where major traffickers have been arrested.

In both joint operations, the arrested individuals are suspected of involvement in a well-known transnational criminal network operating in West Africa, linked to more than 50% of the major ivory and pangolin seizures that occurred globally between 2018 and 2021. These arrests have seriously disrupted the activities of this network and we would like to acknowledge the impressive work of the Nigerian Customs Service in these cases.

In addition to our efforts on the ground, we produced an

impressive array of intelligence reports, delivering detailed insights to law enforcement agencies and policymakers. To further expand our community's knowledge base, we also organised a well-received webinar where a panel of experts examined how addressing crime convergence can offer strategic advantages in the fight against wildlife crime and other serious organised crimes.

As the year progressed and the battle against COVID-19 evolved, more international gatherings and meetings took place. We participated virtually in the UN Crime Congress, attending the special event "The nature of corruption: Addressing corruption linked to wildlife, forest and fisheries crime". At the UN General Assembly Special Session (UNGASS), we co-hosted a side

event, “Leveraging the best tools to address environmental crime enabled by corruption”. We organised a side event at the meeting of the United Nations Convention against Corruption (UNCAC), focusing on best practices for law enforcement fighting corruption-enabled environmental crime. A particular highlight of our busy event schedule was the International Union for Conservation of Nature (IUCN) Congress, where the Wildlife Justice Commission officially launched our work on fisheries crime.

During 2021 we also expanded our partnerships with the International Anti-Corruption Academy (IACA) and the Association of Certified Anti-Money Laundering Specialists (ACAMS). The Wildlife Justice Commission and IACA organised two virtual panel discussions on the correlation between environmental crime and corruption. During the year, we also joined the Nature Crime Alliance and formed a new partnership with Transparency International to collaborate against corruption. These partnerships are raising the profile of wildlife crime amongst those working to fight money laundering and corruption and provide practical tools to recognise illegal wildlife trade.

With all these activities, you can see why I have chosen to associate 2021 with the amazing work of my colleagues, and to the donors who make our efforts possible! The Dutch Postcode Lottery awarded the Wildlife Justice Commission a EUR 1.9 million special grant for a three-year project, building and strengthening intelligence capacity to fight wildlife crime in protected areas of Southeast Asia. We are also honoured to have received a EUR 1 million grant for our work from Arcadia, a charitable fund of Lisbet Rausing and Peter Baldwin.

Furthermore, the Wildlife Justice Commission is expanding into the area of fisheries crime through

secured funding from our long-standing supporters. In 2021, the Wildlife Justice Commission started preparations for investigations into the trafficking of shark fins and sea cucumbers.

Wildlife Justice Commission welcomed Susi Zijderveld as our new Chair of the Supervisory Board in 2021. I would like to thank our previous Chair, Sam Muller, for all his support and dedication over the past years — since the very first day of the Wildlife Justice Commission’s existence. Sam was our founding Executive Director and one of the driving forces behind the creation of the Wildlife Justice Commission.

Looking back on the year, I would like to extend my sincere gratitude to all our supporters for their generosity and dedication to our shared mission of fighting wildlife crime. Together, we can make an even greater difference in 2022.



Highlights



IUCN World Conservation Congress
Marseille (France)



Special project Galvanise awarded by the National Postcode Lottery
Amsterdam (Netherlands)



Species Unite Podcast with Olivia Swaak-Goldman
New York (United States)



Joint operation with Nigerian Customs Service
Lagos (Nigeria)



TEDx Bulgaria with Sarah Stoner
Sofia (Bulgaria)



UNTOC Session
Kyoto (Japan)

Tackling corruption linked to environmental crime

Friday 17 DEC 12:30 - 13:30
Nile Valley Room, Sharm El Sheikh International Congress Center.

MODERATION
Chair: Sarah Gardner, Executive Director, Wildlife Justice Commission.

ORAL PRESENTATIONS
Dr. Tigrana, Deputy National Member of France Senate.

Panel
Lucie de Cauffon, Ambassador, French Ministry of Foreign Affairs.

Panelists
Nicola Robinson, Crime Prevention and Control Centre Officer, Corruption and Economic Crime Branch, UNODC.

Chair
Christophe Houdreau, Chief of International Criminal Justice, UNODC.

Panelists
Sven Garmstad, Director of Program, Wildlife Justice Commission.

UNCAC Side Event
Cairo (Egypt)



Joint operation with Royal Thai Police
Bangkok (Thailand)

Intelligence-led investigations

In 2021, despite the challenges imposed by the COVID-19 pandemic, the Wildlife Justice Commission managed to achieve outstanding results that even eclipsed previous years. The organisation increased its focus on information collection and analysis and developed an unparalleled intelligence perspective on the global trafficking situation. This puts the organisation in a strong and unique position to support the efforts of law enforcement partners with relevant, timely intelligence. During 2021, the Wildlife Justice Commission helped to secure the arrests of 32 suspects, disrupting the criminal capabilities of 10 networks trafficking wildlife¹.

Africa to Asia nexus

The Wildlife Justice Commission has conducted significant, in-depth intelligence analysis at both ends of the supply chain in Vietnam, China and in various countries in Africa. These findings helped identify nine Level-5 traffickers and 15 Level-4 traffickers, as well as their affiliated criminal networks involved in trafficking ivory, rhino horn and pangolin scales between Africa and Asia.

In July and September, acting on intelligence provided by the Wildlife Justice Commission, Nigeria Customs Service arrested five suspects and seized 211 sacks containing 8.1 tonnes of pangolin scales, 9.6 kg of pangolin claws and 870 kg of ivory in Lagos. All wildlife products were destined for export. This is

the ninth largest seizure of pangolin scales since 2019 but importantly the first where major traffickers have been arrested.

In both joint operations, the arrested individuals are suspected of involvement in a well-known transnational criminal network operating in West Africa, linked to more than 50% of the major ivory and pangolin seizures that occurred globally between 2018-2021. These arrests have seriously hampered the activities of this network and we would like to acknowledge the great work of the Nigerian Customs Service in these cases.

Live pet trade

The Wildlife Justice Commission has been investigating the illegal exotic pet trade since 2016, with an initial primary focus on the trafficking of orangutans out of Indonesia and Malaysia, as well as the trafficking of turtles and tortoises (Testudines) out of Malaysia, India and Bangladesh. In 2021, the Wildlife Justice Commission's investigations on the live pet trade led to the arrests of five traffickers, two of which were assessed to be prolific wildlife suppliers.

In February, during a **joint operation** with the Royal Thai Police and the US Fish and Wildlife Service in Bangkok, a suspected high-level wildlife trafficker was arrested whilst attempting to supply a leopard cub to a Wildlife Justice Commission undercover operative.

¹ The cases that are reported publicly are mentioned in this annual report.

The seized leopard cub was handed over to the Thai Department of National Parks, Wildlife and Plant Conservation where it is making excellent progress in a rehabilitation centre.

After the initial Thai arrest the Royal Thai Police investigation continued with an additional two suspects being arrested and further enquiries being made in relation to anti-money laundering offences. The Wildlife Justice Commission also continued our own investigation and we have linked the suspect to an extended transnational criminal network operating across South and Southeast Asia which specialise in the trafficking of big cats and primates. This arrest was the culmination of five years of investigations by our undercover investigators and crime analysts, who will be providing evidence for the Thai prosecution of the high-level wildlife trafficker. We also wish to acknowledge the great work of the Royal Thai Police and the US Fish and Wildlife Service.

Intelligence Development Unit

The Intelligence Development Unit (IDU) is the largest intelligence analysis team of a non-profit focusing solely on wildlife crime and is the cornerstone of our work. It has established itself as one of the key players in the field of wildlife crime intelligence analysis, driven by the need to highlight the value of this hugely under-resourced response to wildlife crime. Our intelligence is increasingly referred to by other actors in the field of wildlife crime and advocacy. The Wildlife Justice Commission is actively raising awareness of the value and need for intelligence analysis, thereby raising the standard of intelligence analysis and its application in tackling transnational organised wildlife crime.



Sharing our findings: Publication highlights

In 2021, the Wildlife Justice Commission shared a significant amount of intelligence reports and briefing papers. On a global and multilateral level, we are uniquely positioned to provide a wealth of information on wildlife crime, based on our investigations and intelligence analysis, to high-level stakeholders, law enforcement agencies and policy makers.

Werner Myburgh

Chief Executive Office,
Peace Parks Foundation

“As a co-founder of the Wildlife Justice Commission, we are pleased to offer continued support to their invaluable research that informs effective strategies to combat illegal trade of environmental products, thereby helping to secure those natural resource required to sustain life on earth.”



We published four major public reports in 2021:

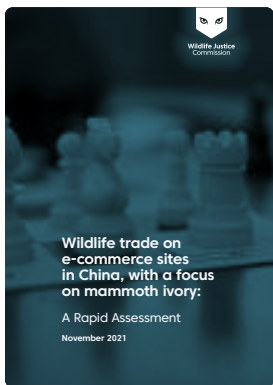
The Wildlife Justice Commission also organised a well-received webinar, *Crime convergence: Intelligent Approaches to Organised Crime*, where we were joined by a panel of experts to examine how addressing crime convergence can offer strategic advantages in the fight against wildlife crime and other serious and organised crimes.



Convergence of wildlife crime with other forms of organised crime



Giant clam shells, ivory, and organised crime. Analysis of a potential new nexus



Assessing wildlife trade on e-commerce sites in China, with a focus on mammoth ivory (supported by Peace Parks Foundation)



Bringing down the Dragon: A synopsis of China's largest ivory smuggling case

In the news

Throughout 2021, the Wildlife Justice Commission further increased our media outreach and continued to serve as a point of reference on wildlife crime. Though most of our operations are confidential and not reported in the media, the Wildlife Justice Commission was mentioned 62 times in international media outlets.

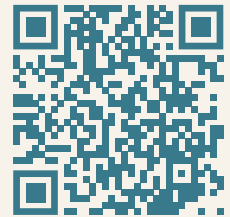
1 **The Financial Times: Nigeria emerges as hub for illicit pangolin trade**

2 **South China Morning Post: China's ivory ban at risk from legal online trade in woolly mammoth tusks**

3 **The New York Times: 2 Ivory Smugglers Captured in International Operation, US Says**

4 **National Geographic: Criminals are stealing giant clams — and carving them like ivory. Here's why**

Highlights include:



Links to articles and features are available.

5 **Mongabay: As seizures of poached giant clams rise, links to ivory trade surface**

6 **Trouw: De jacht op stropers in Afrika vereist een speciale aanpak, bewijst de ondergang van de Kromah-bende**

7 **Reuters: Forest rangers struggle to prevent poaching amid lockdowns**

8 **The Independent: Stop the Illegal Wildlife Trade: Animal part stockpiling may have been made worse by pandemic, experts warn**



7.137 kg of pangolin scales, equivalent to at least 17.500 pangolins, 4.6 kg of pangolin claws and 870.44 kg of ivory, equivalent to 87 elephants, were seized by the Nigerian Customs Services on 28 July 2021 in Lagos.

© Nigerian Customs Service

Prioritising policy to tackle transnational organised wildlife crime

Building and strengthening our alliances

The Wildlife Justice Commission's analytical findings are increasingly shared for use in advocacy, advancing global understanding of wildlife crime, and policy development purposes. The United Nations Office on Drugs and Crime (UNODC), World Wildlife Fund (WWF) the United Nations Convention against Corruption (UNCAC) Coalition, United States Fish and Wildlife Services (USFWS) and the Financial Action Task Force (FATF) have benefitted from the Wildlife Justice Commission's findings to advance their missions.

The Wildlife Justice Commission has been increasingly engaging with a variety of international bodies focused on fighting corruption. For example, we created a working group on environmental crimes and signed a Memorandum of Understanding with Transparency International. We also further strengthened our engagement with various other actors, such as Global Initiative Against Transnational Organized Crime (GITOC), the National Whistleblower Centre, and the End Wildlife Crime initiative.

The Wildlife Justice Commission also joined the Nature Crime Alliance as a civil society leader. Finally, we expanded our partnerships with key stakeholders to address the corruption and money laundering that facilitates wildlife crime, such as the Association of Certified Anti-Money Laundering Specialists (ACAMS)

and the International Anti-Corruption Academy (IACA). ACAMS, WWF and the Wildlife Justice Commission also launched a free training module to aid law enforcement officials in the use of financial intelligence and other data when initiating and expanding investigations into wildlife crime.

Participation in events

On the multilateral stage, the Wildlife Justice Commission played a larger role than in past years. We presented our findings to delegates and policy makers in multiple high-level fora:

- Kyoto Crime Congress:** The Wildlife Justice Commission was invited to participate in a special event organised by the UNODC at the Kyoto Crime Congress. We were one of the few NGOs represented amongst key international governmental leaders. The Wildlife Justice Commission stressed the need to further assess the convergence of wildlife crimes with other forms of organised crime.



- United Nations General Assembly Special Session Against Corruption (UNGASS):** The Wildlife Justice Commission co-organised a France-sponsored event with GITOC. In this event, the Wildlife Justice Commission briefed policymakers on the best tools to address corruption linked to transnational organised wildlife crime.



- IUCN World Conservation Congress Marseille:** The Wildlife Justice Commission introduced our approach to a broader conservation audience and officially launched our fisheries work in a presentation at the IUCN Marine and Polar Pavilion.



- United Nations Convention Against Corruption (UNCAC):** The Wildlife Justice Commission co-organised an event at the 9th Conference of the State Parties together with France, Belgium and the UNODC. This event touched on how to address corruption by targeting the illicit financial flows linked to environmental crimes. The Wildlife Justice Commission stressed the need to use specialised investigative techniques to address wildlife trafficking.



In November, the Wildlife Justice Commission's Director of Intelligence Sarah Stoner was invited to give a **TEDx Talk** where she discussed the value of intelligence analysis in the fight against wildlife crime. She used the transnational pangolin trade as a case study to demonstrate how intelligence analysis increases our understanding of crime and how to effectively intervene.

Our partners

The Wildlife Justice Commission is proud of what we achieved in 2021, but none of it would have been possible without our generous supporters. We are standing up against a multi-billion-dollar illicit industry; to take on this immense challenge, we rely on the contributions of lotteries, foundations, government institutions, non-profit organisations and individuals. United by the drive to protect our planet's vulnerable wildlife, the Wildlife Justice Commission is extremely grateful for our donors' continued support and flexibility. In 2021, we were proud to include Arcadia - a charitable fund of Lisbet Rausing and Peter Baldwin - in our support base.



Dr Simon Chaplin

Chief Executive Officer, Arcadia

“As the Wildlife Justice Commission says, it takes a network to defeat a network. Wildlife crime – where plants and animals are traded illegally – often overlaps with more widely known forms of organised crime. With the right partnerships and expertise, these networks can be obstructed. We are delighted to support the Wildlife Justice Commission’s efforts to protect biodiversity and empower those who are on the frontline tackling wildlife crime.”

Our partners



We also extend our appreciation to the generous donors who wish to remain anonymous.

Thanks

Friends of Wildlife Justice Commission

We are supported in the United States by Friends of Wildlife Justice Commission. It is a 501.3.(c) registered charity established in the United States in 2017 and officially launched in 2019. Friends of Wildlife Justice Commission is an important partner to the Wildlife Justice Commission, building a network of

supporters in the United States and strengthening relationships with government and policy makers there. In 2021, Friends of Wildlife Justice Commission supported our work through generous contributions from The Whitehead Foundation and several anonymous donors (both foundations and individuals).



In-kind supporters

A number of organisations and businesses generously contribute to our mission with pro-bono assistance and in-kind donations. We are extremely grateful for their support.

Arnold & Porter

BOWMANS
THE HOUSE OF BUSINESS

CLIFFORD
CHANCE

كليفورد
كليفورد
CLYDE & CO

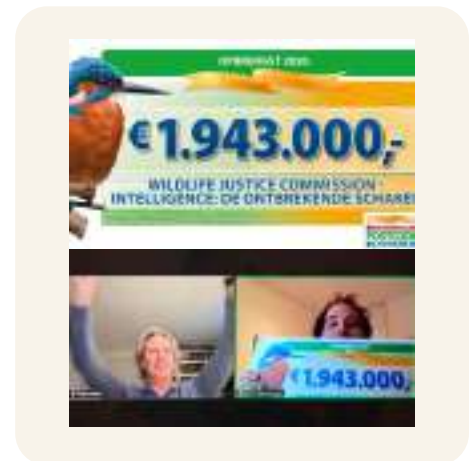
SIDLEY

Stibbe

UOO UDOMA II
BELLI-CHANG II

National Postcode Lottery

New project Galvanise focuses on building intelligence capabilities in five countries in Southeast Asia



In March 2021 we were honoured to receive from the Dutch Postcode Lottery a special grant of EUR 1.9 million for a three-year project named Galvanise. The project aims to build and strengthen intelligence capacity to fight wildlife crime in protected areas of Southeast Asia.

Under the umbrella of the project, the Wildlife Justice Commission will develop a community platform for intelligence analysts. The platform has two objectives:

- 1 **Support** intelligence analysts in the field
- 2 **To provide** online training modules as part of offline trainings or as stand-alone training programs

The platform will contain a discussion forum, a library, and an e-learning tool and supports analysts worldwide in their day-to-day work, increase the quality of analysts and their work in the area of wildlife crime and strengthen the position of the Wildlife Justice Commission as a leader in this field.

The team at the Wildlife Justice Commission

The Wildlife Justice Commission is a team of highly skilled professionals, combining our expertise to make us a leading authority in our field. As of 31 December 2021, the Wildlife Justice Commission team comprised 65 field and office staff and we are very proud of our diverse nature. The organisation, including field staff, represents 20 different nationalities. The team is made up of 32 women and 33 men. Four of the seven senior management positions are held by women. Within the Intelligence Development Unit, the largest intelligence unit of any non-profit organisation focused on wildlife crime, all the criminal analysts are women.

Ensuring the safety of our people and the quality of our work is of the utmost importance to the Wildlife Justice Commission. Therefore, the organisation developed and implemented a series of policies and procedures to ensure both are protected. Team members participated in risk and crisis management training during 2021, and the Code of Conduct, Whistleblower Policy, and Risk Policy are reviewed and confirmed on an annual basis.



65
field and office staff

32
are women



20
different nationalities

4/7

four of the seven senior management positions are held by women

Date as of 31 December 2021



The Wildlife Justice Commission continues to value the support of our supervisory board and ancillary bodies (outlined below), providing expert insights to help guide our work.

SUPERVISORY BOARD

A dedicated group of experts who provide both strategic guidance and supervision to the organisation. Members of the Supervisory Board receive no remuneration for their work for the Wildlife Justice Commission.

EXECUTIVE BOARD

The final decision-making body and responsible for the organisation, consisting of the Executive Director and the Director of Programs.

FRIENDS OF WILDLIFE JUSTICE COMMISSION BOARD OF DIRECTORS

Friends of the Wildlife Justice Commission Board who support the mission and vision of the Wildlife Justice Commission in the USA.

INDEPENDENT REVIEW PANEL

The Independent Review Panel (IRP) plays a critical role in the Wildlife Justice Commission’s process by conducting objective examination and evaluations of the Wildlife Justice Commission’s Case Files. Members of the IRP are therefore carefully selected based on their: 1) affinity with the rule of law, transparency and anti-corruption; 2) independence; and 3) impartiality and high moral character.

WILDLIFE JUSTICE COMMISSION COUNCIL

Members are renowned professionals from various fields who contribute with their vast experience to furthering the activities of the Wildlife Justice Commission. They are appointed by the Executive Board, after consultation with the Supervisory Board.

More information about the members of each of these bodies can be found on our website.

[Link to Our People →](#)

Balance sheet as per 31 December 2021

	31-12-21	31-12-2020
	€	€
Assets		
Non-current assets		
- Automation and furniture	47.814	60.575
Current assets		
- Receivables	580.440	616.641
- Cash and cash equivalents	4.370.747	1.448.576
Total current assets	4.951.187	2.065.217
TOTAL ASSETS	4.999.001	2.125.792
Liabilities		
Reserves and funds		
Reserves		
- Continuity reserve	732.780	725.691
- Designated reserve General	449.478	442.389
- Designated reserve Africa-Asia Nexus	593.887	0
- Designated reserve Marine Species	476.873	0
Total reserves	2.253.018	1.168.080
Funds		
- Designated funds	0	18.500
Total funds	0	18.500
Total reserves and funds	2.253.018	1.186.580
Reporting obligations	2.539.765	773.069
Accruals		
- Long term accruals	13.537	7.272
- Short term accruals	192.682	158.871
Total accruals	206.218	166.143
TOTAL LIABILITIES	4.999.001	2.125.792

Income statement 2021

	Actual 2021	Budget 2021	Actual 2020
	€	€	€
Income			
- Income from individual donors	5.577	0	142.466
- Income from lotteries	612.099	500.000	594.487
- Income from other non-profit organisations	3.276.882	2.855.929	1.658.243
- Government grants	44.604	0	43.127
- Other income	0	0	450
TOTAL INCOME	3.939.161	3.355.929	2.438.773

Expenditure

Charitable activities

- Programs	2.166.611	2.198.619	1.703.242
- Joint Operations	0	0	17.921
- Strategic Partnerships	0	0	155.844
- Planning, Monitoring & Evaluation	0	0	40.603
- Communications	215.281	310.477	219.460
TOTAL CHARITABLE ACTIVITIES	2.381.891	2.509.096	2.137.070

	Actual 2021	Budget 2021	Actual 2020
	€	€	€
Fundraising			
- Costs of Development and Fundraising	218.488	335.460	215.389
Management & Administration			
- Management & Administration costs	263.144	511.373	301.970
TOTAL EXPENDITURE	2.863.524	3.355.929	2.654.429
Balance before financial income and expenditure	1.075.638	0	-215.656
- Financial income and expenditure	-9.200	0	-4.467
BALANCE INCOME AND EXPENDITURE	1.066.438	0	-220.123
Allocation balance of income and expenditure			
- Continuity reserve	7.089	0	0
- Designated reserve General	7.089	0	-139.649
- Designated reserve Africa-Asia Nexus	593.887	0	0
- Designated reserve Marine Species	476.873	0	0
- Designated funds	-18.500	0	-80.474
BALANCE INCOME AND EXPENDITURE	1.066.438	0	-220.123

Key figures

	Actual 2021	Budget 2021	Actual 2020
	%	%	%
Key figures			
Costs of fundraising divided by total income	6%	10%	9%
Share in expenditure			
- Charitable activities	83%	75%	81%
- Fundraising costs	8%	10%	8%
- Management and administrative costs	9%	15%	11%
TOTAL	100%	100%	100%



dubois + co
REGISTERACCOUNTANTS

Stichting Wildlife Justice Commission
Johan de Wittlaan 7
2517 JR 'S-GRAVENHAGE

Amsterdam, 13 December 2022

Referentie: TY/GV/5458/20220001792

Dear Ms. Cornelissen,

Please find enclosed the digitally identified financial statements 2021, and our auditor's report dated 13 December 2022. We identified the financial statements and signed our auditor's report with the 'PKIOverheid Beroepscertificaat' by means of a digital signature.

We confirm that you may publish the financial statements accordingly. Publication of our auditor's report is permitted solely with the financial statements.

We trust that we have been of service.

Yours sincerely,
Dubois & Co. Registeraccountants

Valid Signed door Gido Visser
op 13-12-2022

G. Visser RA

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KvK nummer 34374865



Join our fight against wildlife crime



Take up our banner:

Share our mission.



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Support our work directly.

[DONATE](#)

JOIN US



**Law enforcement
and legal experts
fighting transnational
organised wildlife crime.**



**Wildlife Justice
Commission**

www.wildlifejustice.org