

# WildLeaks



THE WORLD'S FIRST  
WHISTLEBLOWER  
INITIATIVE  
DEDICATED TO  
ENVIRONMENTAL  
& WILDLIFE CRIME

CREATED AND MANAGED BY

ELI



EARTH  
LEAGUE  
INTERNATIONAL

September 2020



# WildLeaks Report

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## Executive Summary

Earth League International - ELI (formerly Elephant Action League) launched WildLeaks, **the world's first whistleblower initiative dedicated to environmental and wildlife crime**, in 2014. ELI's goal was to enhance the collection and analysis of information from around the world in order to disrupt wildlife crime. **To meet this goal, ELI created a "safe platform" online, a secure and anonymous space so that people with information could share that information without taking personal risks, particularly in highly corrupt countries.** Information gathered through this safe space, information that would not have been shared otherwise, can then be used by ELI, and its trusted partners, including law enforcement agencies, for further investigation and to facilitate the identification, arrest, and prosecution of criminals, traffickers, businessmen, and corrupt governmental officials behind the poaching and the trafficking of wildlife, illegal fishing and illegal logging. Environmental and wildlife crime offences enrich transnational criminal organizations and local militias, often undermining national security.<sup>1</sup> Corruption, money laundering, and violence are often found in combination with various forms of wildlife crime.

Offences like poaching, trafficking in live or dead endangered animals, illegal fishing, and illegal logging are complex phenomena where a variety of factors interact – cultural, social, economic and environmental – and often involve different actors. As a result, it is now clear that wildlife crime has wide national and international security implications, but governments tend to see the problem as just an environmental issue and the global fight against wildlife crime is failing. The role of independent NGOs and activists remain crucial, but there is a definite need to **unite law enforcement agencies, the public, the activists, the academics, and the policy makers against environmental and wildlife crime.** A true commitment to the conservation of the world's environment,

biodiversity, and natural resources, requires that all five elements work together. With this in mind, **Earth League International realized that a huge volume of key information about wildlife crime, and environmental crime in general, was in the hands of untapped sources working and living around the world, both inside and outside criminal networks.** Many of these potential sources were not willing, inspired, or incentivized to share information for many reasons, but primarily out of fear for their own personal security, as well as a lack of trust in local authorities. In response to this realization, ELI developed WildLeaks to receive and evaluate anonymous information and tips regarding wildlife crime, and then transform those tips into concrete action, possible actionable intelligence.

The framework of legal protection, and a safe space in which to report crime, are sorely lacking and often keeps individuals with evidence of illicit acts from bringing that information to enforcement authorities. When a person with information decides to "blow the whistle" on a case of wildlife trafficking, for example, this person would not feel safe using traditional methods available for whistleblowing as going public may be risky or outright dangerous. In these cases, the person reporting a crime needs a safe environment in which he or she can report the crime. It is for this reason that the advent of the WildLeaks Project has proven extremely useful.

This report provides a summary of the existing legal framework for wildlife whistleblower protection; introduces the reader to WildLeaks and the potential for whistleblowers to play a crucial role in fighting back against environmental and wildlife crime; lists the most interesting leaks and submissions received so far, and identifies possible actions that would allow ELI to enhance the WildLeaks initiative's potential for fostering the fight against environmental and wildlife crime.

1. INTERPOL-UN Environment, "Strategic Report: Environment, Peace and Security – A Convergence of Threats" (INTERPOL-UN Environment, December 2016), <https://www.interpol.int/Crime-areas/Environmental-crime/Resources>.

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# Introduction

WildLeaks is the world's first international whistleblower initiative dedicated to wildlife, forest, and fisheries/IUU fishing crime (hereafter environmental and wildlife crime). It is a not-for-profit collaborative project, created, funded, and managed by Earth League International (ELI), **with a mission to securely receive and evaluate anonymous information into actionable intelligence and concrete action.**

After spending many years working in various countries in parallel careers encompassing both security and conservation, Mr. Andrea Crosta, the co-founder of ELI, recognized the need for an avenue for people in the know to safely report environmental and wildlife crime. He became aware of the huge volume untapped of information about such crimes in the hands of people working and living around the world. Many of those people were not willing, or inspired, to share information for many reasons, but primarily out of fear for their own personal security, as well as a lack of trust in local authorities.



Recognizing this enormous potential value, ELI began working on a way to facilitate the sharing and collection of sensitive information. ELI's team understood the importance of "extracting" such information not only from the many individuals willing to help, but also from those in countries where it is nearly impossible and very dangerous to act on such information, namely countries where pervasive corruption is present and corrupt government officials are involved in, or passive about, environmental and wildlife crime. The resulting technology had to be a safe space where people could easily share information on environmental and wildlife crime both securely and anonymously.

In February 2014, with the support of various technology experts, the Hermes Center for Transparency and Digital Rights and GlobaLeaks, ELI launched WildLeaks. This platform allows individuals to share information on wrongdoings without risking their personal and professional lives, all thanks to the guarantee of anonymity ensured by the use of a state-of-the-art secure system built on Tor Technology.

**The first anonymous leak was submitted to WildLeaks within 24 hours of the launch. A whistleblower reported a flood of endangered African raptor feathers for sale on eBay in the United States. According to the whistleblower, “Many of these sellers are using CITES permits, but I know most of these are coming from poached birds, and going through licensed taxidermists using recycled CITES permits, and they are simply sending them via mail, and not registering them through the proper wildlife ports.”**

**The information received serves to accomplish WildLeaks mission:** disrupt environmental and wildlife criminal activities, support law enforcement, and facilitate the identification, arrest, and prosecution of the criminal networks, traffickers, businessmen, corrupt governmental officials, or anyone behind environmental and wildlife crime. To do so, ELI works with a network of experts that includes scientists, environmental lawyers, legal and criminal justice experts, and former intelligence officers, to evaluate and validate each submission and determine possible further action.

Potential outcomes following a submission include:

- Beginning or continuing an investigation with internal ELI teams and/or in collaboration with trusted partners;
- Sharing information with trusted contacts within select law enforcement agencies and/or with other NGOs; and
- Sharing the information with media partners.

This report introduces the reader to whistleblowing in the context of environmental and wildlife crime. More specifically, the reader is introduced to WildLeaks and the potential for whistleblowers to play a crucial role in fighting back against environmental and wildlife crime, and more generally environmental crime. The purpose of the report is to educate a global population about the potential of the WildLeaks platform while identifying possible actions that would allow ELI to enhance that potential to better foster the fight against wildlife, fishing, and forest crime.

# EARTH LEAGUE INTERNATIONAL The first Intelligence Agency for the Earth

## 3-Pillar Approach to Environmental Crime and Conservation

Earth League International (ELI), formerly Elephant Action League, established in 2013, is an innovative nonprofit organization that merges the worlds of intelligence, analysis, media and conservation in service of wildlife, oceans and forests, and the people who protect it. Comprised of former FBI officers, crime analysts, environmental experts and media professionals, ELI is the first Intelligence Agency for the Earth, built organically to combat Environmental Crime and Exploitation through a three-pillar approach:

INTELLIGENCE & ANALYSIS	WHISTLEBLOWING	MEDIA & PUBLIC OUTREACH
Intelligence-gathering, analysis, and undercover investigative operations	WildLeaks, the world's first whistleblower initiative dedicated to environmental crime	Production of public reports, documentaries, TV series, and graphic novels focused on environmental crime

ELI has worked to develop this novel approach to conservation to address **three of the most important facets of the war against environmental crime**. This includes:

- 1. Gathering of first-hand knowledge of the problem**, the drivers, and the criminal networks behind environmental crime and exploitation;
- 2. Empowering people from around the world**, especially from countries where it is dangerous to report environmental crime, **to share information** in a secure manner; and
- 3. Reaching and inspiring the public** through current, strong narratives about environmental crime and exploitation, **using powerful media products** and partnerships with media industry leaders.

### INTELLIGENCE & ANALYSIS

The core of our work involves intelligence-gathering, undercover operations, and analysis that targets environmental criminals, traffickers and transnational organized crime (TOC), all with the aim of supporting the work of trusted law enforcement and government agencies.

Intelligence is building the knowledge – ideally the foreknowledge – that ELI, its partners, and governmental authorities can employ to safeguard the environment, wildlife, and people. Professionally run intelligence and investigative activities are some of the most important tools for fighting environmental crime.

As with the fight against other international threats, such as terrorism, drug trafficking or organized crime, intelligence must be at the center of our efforts to fight environmental crime. It is our contention that **professionally run intelligence and investigative activities are currently the most important tools for fighting environmental crime**. The intelligence-led approach is needed to integrate the more traditional “reactive” short-term conservation model with a more proactive, impactful, long-term and disruptive approach.

It is, and should be used as, a strategic resource to focus investigations and law enforcement activities, policy changes, and funding.



Reconnaissance mission in Mexico

As a lean, highly focused NGO, ELI leverages:

1. Its ability to quickly allocate resources to newly identified targets and hotspots;
2. Its access to people and resources that would never normally collaborate directly with local governmental entities; and
3. Its ability to deliver confidential information, including detailed case files, regarding criminals and wildlife criminal networks to trusted individuals within a government agency, more easily bypassing potential bureaucracy and corrupt officials.



**Example of a Crime Map with Targets (Persons of Interest and various entities)**

**Earth League International operates at the nexus of civil society and law enforcement – bridging the resource, knowledge, and priority gaps exhibited by many government and law enforcement agencies around environmental crime.**

#### WHISTLEBLOWING

The second pillar of ELI’s work is its whistleblowing platform. In 2014, ELI launched WildLeaks, **the world’s first whistleblower initiative dedicated to environmental crime**. The mission of WildLeaks is to receive and evaluate anonymous information and tips regarding environmental and wildlife crime, including corruption, and transform that information into concrete action. The purpose is to prevent environmental crime and to facilitate the identification, arrest, and prosecution of criminals, traffickers, businessmen, and corrupt governmental officials.

WildLeaks implemented a secure online anonymous submission platform built on Tor technology where users can stay fully anonymous and submit ‘sensitive information’ as securely. Since its launch, WildLeaks has received hundreds of confidential submissions, generated various field investigations, and shared dozens of confidential reports with other NGOs and law enforcement agencies.



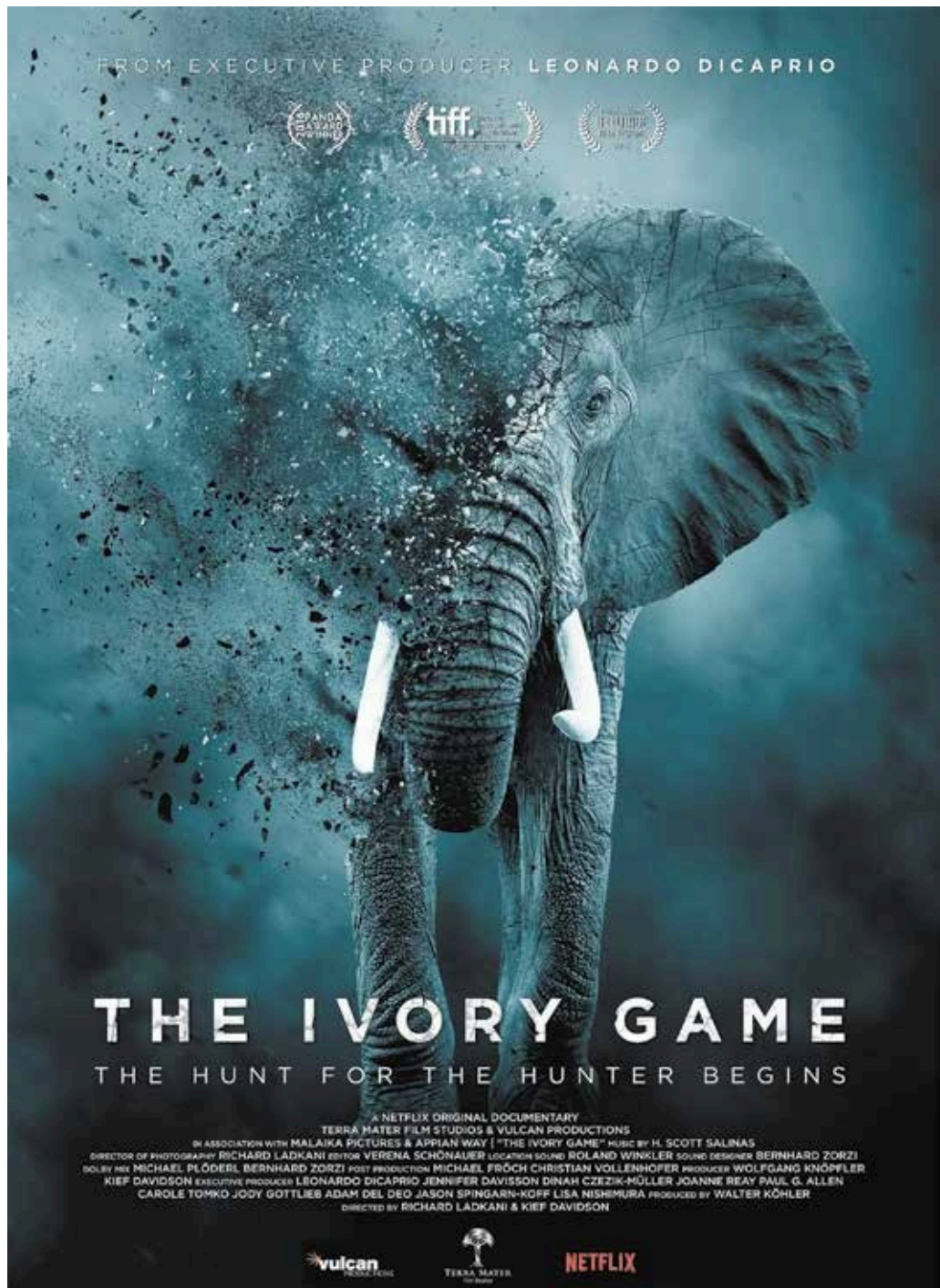
**ELI’s analysts at work during a mission in Asia**

#### MEDIA & PUBLIC OUTREACH

The phenomenon of global environmental threats calls into question the extent to which individual state governments can adequately handle this complex issue.



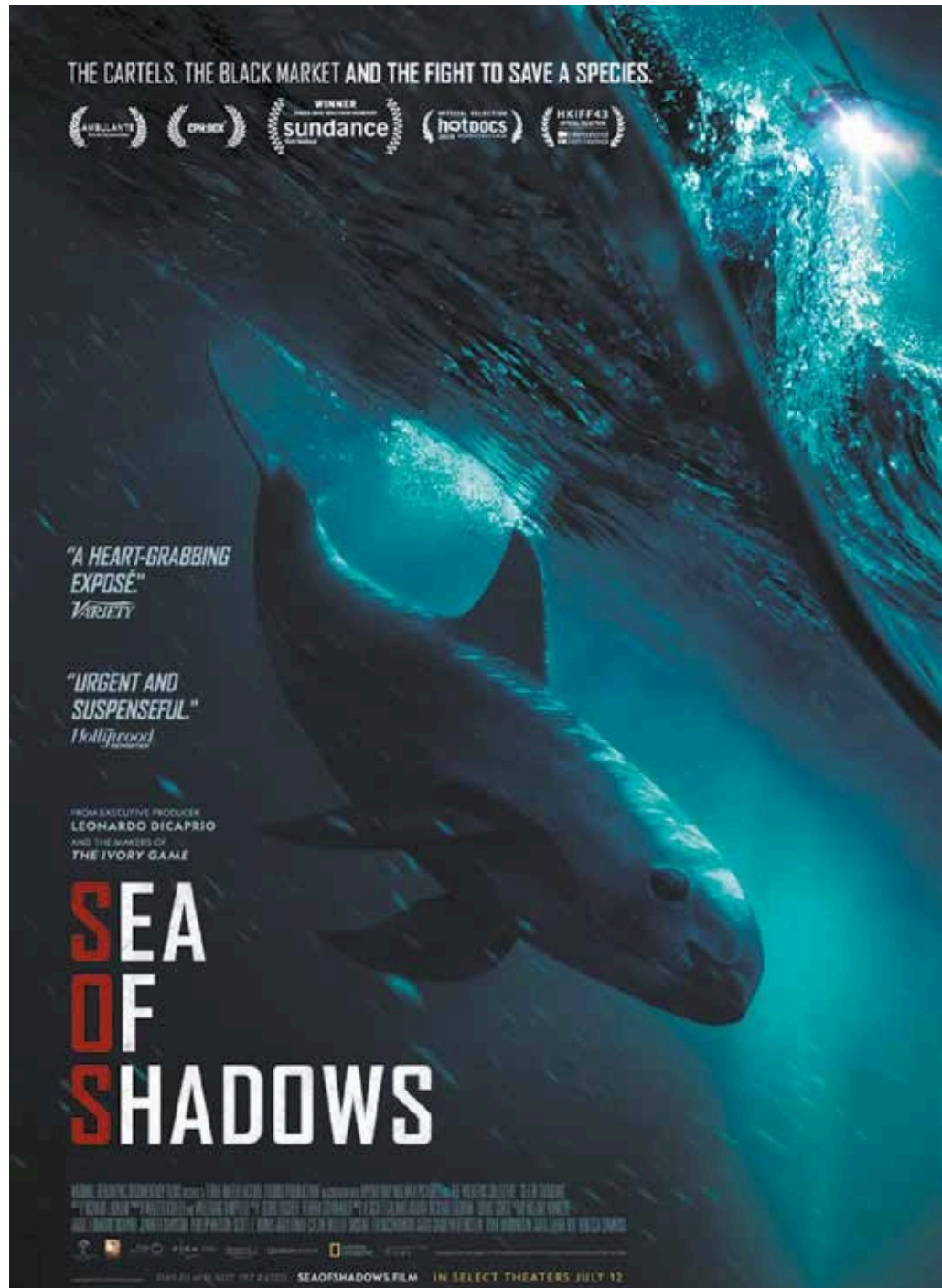
Non-governmental organizations (NGOs) play a crucial role in achieving global awareness of important issues that transcends the national political boundaries and facilitates a real collaboration between all the stakeholders.



Communication is also the heart of advocacy, which should always be at the core of any environmental organization, due to its central role in shaping public perceptions and working to influence public policy to achieve positive and long-lasting changes.

**We believe it is important to collaborate with important partners in the film and media industry to be able to produce content that can reach millions of people worldwide.**

ELI teams were among the main protagonists in **two of the most important environmental documentaries of the past 4 years**, *The Ivory Game* (Netflix), that won the Beijing Film Festival in 2017 and many other awards, and *Sea of Shadows* (National Geographic) that won the Sundance Film Festival in 2019. Both documentaries were co-produced by Terra Mater Factual Studios and Leonardo DiCaprio, and directed by Richard Ladkani.



We are currently involved in two new documentaries, a short art docufilm, a TV series, and a graphic novel project – working to get the word out about our work and environmental crime through as many media avenues as possible.



## COLLABORATION WITH GOVERNMENT AND LAW ENFORCEMENT AGENCIES



**Andrea Crosta with  
the Head of the  
Mexican Navy,  
Admiral Vidal  
Francisco Soberón**



**Capacity building  
with U.S. Homeland  
Security in Thailand**

ELI routinely partners with key national and international government agencies to share information, support their investigative activities and exchange knowledge on issues pertaining to environmental crime.

Upon the conclusion of our investigations, Earth League International prepares a series of Confidential Intelligence Briefs (CIB) to share with relevant law enforcement bodies at national, regional, and international levels, depending on the nature of intelligence and which agencies are well-positioned to take effective action. **The CIB is arguably the most important piece of output from our intelligence and investigative activities.**

We also participate as speakers at capacity building and training events. Examples of these collaborations include U.S. Homeland Security, UNODC (United Nations Office on Drugs and Crime), and OECD (Organization for Economic Co-operation and Development).

# Wildlife, Forest, & Fisheries Crime

## Wildlife Crime

### **Destruction of seized ivory in Nairobi, Kenya, in 2016**

Wildlife, for purposes of this report, includes all flora and fauna, both live and dead, or products made from wildlife or plants, and crime refers to “acts committed contrary to national and international laws and regulations intended to protect natural resources and to administer their management and use.”<sup>2</sup> Wildlife crime therefore includes:



2. CITES, “Wildlife Crime,” CITES, accessed July 11, 2020, <https://cites.org/eng/prog/icwc.php/Wildlife-Crime>.

3. CITES.

- Illicit exploitation of natural resources such as poaching of elephants, rhinos, and pangolins; unlicensed fishing; and unauthorized logging;
- Processing of wildlife into products; transporting of whole specimens, parts or derivatives, or live flora and fauna; and possessing, offering for sale, and selling illicit wildlife products; and
- Concealment and laundering of profits from trafficking and trade of illicit wildlife products.<sup>3</sup>



4. UNODC, "World Wildlife Crime Report: Trafficking in Protected Species," 2016, 13, [https://www.unodc.org/documents/data-and-analysis/wildlife/World\\_Wildlife\\_Crime\\_Report\\_2016\\_final.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/World_Wildlife_Crime_Report_2016_final.pdf).

5. C. (Editor in Chief) Nelleman et al., "The Rise of Environmental Crime - A Growing Threat to Natural Resources, Peace, Development and Security," A UNEP-INTERPOL Rapid Response Assessment (United Nations Environment Programme and RHIPTO Rapid Response-Norwegian Center for Analyses, 2016), <https://www.interpol.int/News-and-media/News/2016/N2016-073>.

6. INTERPOL-UN Environment, "Strategic Report: Environment, Peace and Security – A Convergence of Threats."

7. INTERPOL-UN Environment.

8. 2019 End Wildlife Trafficking Strategic Review, <https://www.state.gov/2019-end-wildlife-trafficking-strategic-review/>

The illegal wildlife trade is no longer an emerging issue, but rather an established and recognized phenomenon that has become "both a specialized area of organized crime and a significant threat to many plant and animal species."<sup>4</sup> It operates like global multi-national businesses introducing local resources into the global market through complex networks, which often involve local businesses and government, sometimes including those tasked with protecting the same wildlife.

According to the most recent UNEP-INTERPOL assessment report available, released in 2016, environmental crime as a whole is estimated to be valued between USD 91-258 billion per year, making it the 4th largest illegal industry globally.<sup>5</sup> Trafficking and trade of fauna, as a subset of total environmental crime, was estimated at USD 7-23 billion per year.<sup>6</sup> Forest crime came in at USD 51-152 billion and illegal fisheries at USD 11-23 billion.<sup>7</sup>

**Wildlife crime is now the most immediate threat to many species** including elephants, rhinos, big cats, apes, pangolins, and many reptiles and birds. This illegal trade is driven by demand for ivory, horn, bones, scales and other parts used as ornaments, luxury items, traditional medicine, wild bushmeat, or even as live animals for pets and zoos.

Wildlife trafficking remains a serious transnational crime that threatens security, economic prosperity, the rule of law, long-standing conservation efforts, and human health.<sup>8</sup> –

U.S. Department of State



**Rhino horn seized at the Bangkok International Airport, Thailand**

## Forest Crime

9. C. Nellemann et al., “The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources,” A UNEP and INTERPOL Rapid Response Report (Nairobi and Arendal: United Nations Environment Programme and GRID-Arendal, 2014), 61, <http://www.unep.org/unea1/docs/RRAcimecrisis.pdf>.

Generally, forest crime identifies the illegal exploitation of the flora that includes: the taking, trading, importing, exporting, processing, possessing, and consuming of wild flora in breach of national or international law.



10. “The Fight to Protect the World’s Most Trafficked Wild Commodity,” Animals, August 16, 2019, <https://www.nationalgeographic.com/animals/2019/08/guatemala-fight-against-rosewood-trafficking/>.

According to UNEP and INTERPOL, there are four general approaches by which the illegal trade in flora operates, including:

11. “The Fight to Protect the World’s Most Trafficked Wild Commodity.”

12. “Illegal Logging | Global Forest Atlas,” accessed April 14, 2020, <https://globalforestatlas.yale.edu/forest-use-logging/logging/illegal-logging>.

1. The illegal exploitation of high-value endangered wood species, including rosewood and mahogany;
2. Illegal logging of timber for sawn wood, building material, and furniture;
3. Illegal logging and laundering of wood through plantation and agricultural front companies to supply pulp for the paper industry; and
4. Utilization of the vastly unregulated wood fuel and charcoal trade to conceal illegal logging in and outside protected areas, conduct extensive tax evasion and fraud, and supply fuel through the informal sector.<sup>9</sup>

It is estimated that forest crime, including illegal logging, makes up 15-30% of the total global timber trade.<sup>10</sup> This USD 30-100 billion industry causes severe damage to the environment, economies, governance, and rule of law.<sup>11</sup> Illegal logging destroys forests and the services that they supply; threatening biodiversity, causing landslides and increasing carbon dioxide emissions. Rural communities that are usually resource-based are exposed to new menaces and become unstable leading to increasing security issues. Moreover, other than suffocating economic development, illicit logging and harvesting distorts the market and discourages legal businesses from making environmentally and socially conscious investments. Finally, it disrupts the rule of law as this type of crime is deeply tied to corruption and weakening governance.<sup>12</sup>

In the photo:  
Illegal logging  
in Gabon

13. INTERPOL, "Uncovering the Risks of Corruption in the Forestry Sector" (INTERPOL, December

9, 2016).

9. Valenzuela-Quinonez et al., "Critically Endangered Totoaba - Totoaba Macdonaldi: Signs of Recovery and Potential Threats after a Population Collapse."

14. INTERPOL, "Global Forestry Enforcement: Strengthening Law Enforcement Cooperation Against Forestry Crime," Global Forestry Enforcement Prospectus (Lyon France: INTERPOL, April 2019).

15. Alison Hoare, "Tackling Illegal Logging and the Related Trade - What Progress and Where Next?," Chatham House Report (Chatham House, July 2015), <https://www.chathamhouse.org/sites/files/chathamhouse/publications/research/20150715IllegalLoggingHoareFinal.pdf>.

16. Nellemann et al., "The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources," 97.

In key producer tropical forests in the Amazon Basin, Central Africa, and Southeast Asia, illegal logging accounts for 50-90% of all forestry activities and 15-30% of all wood traded globally.<sup>13</sup> In Peru, for example, between 40 and 60% of logging is estimated to be illegal, and in the Brazilian state of Pará illegal logging is estimated to be as high as 80%.<sup>14</sup>

Forest crime is possible due to a relatively permissive environment, including weak governance and regulation, limited resources, poor law enforcement and border controls, and poverty in producer countries. However, consumer countries contribute significantly to these problems by importing timber products without ensuring that it is legally sourced. This situation has been changing, albeit slowly, with legislation enacted in Europe, the U.S., and Australia, barring the import of illegal timber and wood products. Significant improvement has been made in recent years with regard to forest governance in most producer countries, but gaps still remain as the timber industry continues to rapidly evolve.<sup>15</sup>

The illegal trade in wildlife is therefore a barrier to sustainable development, involving a complex combination of weak environmental governance, unregulated trade, loopholes and laundering systems used to conduct serious transnational crime, and undermining government institutions and legitimate business.<sup>16</sup>

**UNEP-INTERPOL(2014)**

## The Human Toll of Wildlife & Forest Crime

17. “Deforestation and Greenhouse-Gas Emissions,” Council on Foreign Relations, accessed December 5, 2016, <http://www.cfr.org/forests-and-land-management/deforestation-greenhouse-gas-emissions/p14919>

18. “Forest Misuse Costs Indonesia \$7 Billion in Revenue, Report Says,” Bloomberg.com, accessed December 5, 2016, <https://www.bloomberg.com/news/articles/2013-11-10/forest-misuse-costs-indonesia-7-billion-in-revenue-report-says>.

19. “Forests and Poverty Reduction,” accessed December 5, 2016, <http://www.fao.org/forestry/livelihoods/en/>.

20. INTERPOL, “Uncovering the Risks of Corruption in the Forestry Sector.”

21. INTERPOL-UN Environment, “Strategic Report: Environment, Peace and Security – A Convergence of Threats.”

Wildlife and forest crime have a human toll that is historically and inexorably linked to the exploitation of local communities and poor people. The international community is beginning to recognize how destructive wildlife crime can be, that it is truly a serious organized transnational crime, and not only degrades the environment, but destroys families and economic potential. The cost of environmental and wildlife crime to humans takes many forms, but a few examples are as follows:

- People dying and getting injured participating in or fighting wildlife crime;
- People encouraged or forced to engage in criminal activities;
- Exploitation of vulnerable and disadvantaged communities;
- Families losing their breadwinners due to death, injury, or incarceration;
- Fueling and funding local conflict; and
- Degradation of the local environment impacting tourism, the local economy, and community livelihoods.

In the case of ivory and rhino horn, for example, as stores in China and other Asian countries are filled with ivory trinkets and horn-based products, not many consumers are aware of the true cost of their purchases. While this trade drives the elephant and rhino population rapidly to extinction, an incalculable amount of human lives has also been drastically affected.

Behind a simple ivory or rhino horn trinket for sale in Beijing or Hanoi, a poacher or ranger may be getting killed in Africa, a wife loses her husband, a child becomes an orphan or recruited as a soldier. Ivory consumers, traffickers, and traders need to be held responsible for the social destruction that surrounds environmental and wildlife crime. By trading and buying ivory they become facilitators of that destruction. Human greed and the desire to make one’s social

status known by placing an ivory trinket on display in one’s home have turned the continent of Africa into an extremely dangerous warzone.

Forest Crime, which is the illegal logging and the international trade in illegally logged timber and wood products, also has a significant human toll as it impedes sustainable development in some of the poorest countries of the world. It costs governments billions of dollars, promotes corruption, and funds armed conflict. The loss of forests is responsible for up to 30% of all human-caused greenhouse gas emissions, rivaling emissions from the total global transportation sector.<sup>17</sup>

Illegal logging has huge financial implications for a country. According to a report by Human Rights Watch, illegal logging and forest-sector mismanagement in Indonesia resulted in losses to the Indonesian government of more than USD 7 billion between 2007 and 2011.<sup>18</sup>

Illegal logging creates social conflict with indigenous and local populations and leads to violence, crime, corruption, human exploitation, and human rights abuses. It is estimated that some 1.6 billion people worldwide depend on forests for their livelihood and 1.2 billion people depend on forests for their subsistence.<sup>19</sup>

According to a report released by INTERPOL in 2016, the estimated annual global cost of corruption in the forestry sector is approximately USD 29 billion. Illegal logging depends highly on corrupt practices including bribery and extortion. It is also closely linked to financial crime, drug trafficking (particularly in Latin America), terrorists and armed groups (charcoal trafficking in Somalia and DRC), and human rights abuses.<sup>21</sup>

Ultimately, forest crime is not only the result of illegal suppliers, but also of uninformed Western consumers.



## Illegal Unreported & Unregulated (IUU) Fishing

22. "INTERNATIONAL PLAN OF ACTION - IUU," accessed April 14, 2019, <http://www.fao.org/3/y3536e04.htm>.

23. FAO, "What Is IUU Fishing? | Illegal, Unreported and Unregulated (IUU) Fishing | Food and Agriculture Organization of the United Nations," accessed April 14, 2019, <http://www.fao.org/iuu-fishing/background/what-is-iuu-fishing/en/>.

24. FAO

25. FAO

26. FAO

27. Emma Myers and Sally Yozell, "Civil-Military Cooperation to Combat Illegal, Unreported, and Unregulated (IUU) Fishing" (The Stimson Center, January 2018).

Illegal unreported and unregulated fishing (IUU) occurs worldwide and in nearly all fisheries, in both areas under national jurisdiction or on the high seas. IUU is an ever-growing threat to the marine ecosystem, undermining efforts to sustainably manage fisheries and to conserve the ocean's biodiversity. IUU fishing leads to multiple adverse costs for fish stocks and for the livelihoods of the people who depend on them.<sup>22</sup> The depletion of fisheries results in the collapse of local fisheries, with amplified effects in developing countries where small-scale fisheries prove to be particularly vulnerable. This results in social and economic losses in the short and long term leading to weakened food security.<sup>23</sup>

The term IUU fishing comprises a wide range of activities that can be understood by analyzing the terms "illegal", "unreported," and "unregulated" as defined by the International Plan of Action to Prevent, Deter, and Eliminate IUU Fishing developed below:

### Illegal fishing:

- Led within the waters of a state by national or foreign vessels, without the permission of that state or in breach of its laws and regulations;
- Led by vessels having the flag of a state, which are parties to a relevant regional fisheries management organization but operate in breach of international law or of the conservation and management practices by that organization and by which those states are bound; or
- In breach of national or international obligations, including those undertaken by cooperating states to a relevant regional fisheries management organization.<sup>24</sup>

### Unregulated fishing:

- Not properly reported, or not reported at all, to the relevant national authority in violation of national laws and regulations; or
- Carried out in an area of competence of a regional fisheries management organization which is not reported or is misreported, in contravention of the reporting procedures of that organization.<sup>25</sup>

### Unreported fishing:

- In an area managed by a regional fisheries management organization, by vessels without nationality, or flying the flag of a State not party to that organization, or by a fishing entity, in a way that does not follow or that violates the conservation and management regulation of that organization; or
- In areas or for fish stocks for which there are no applicable conservation or management measures, and where such fishing activities are conducted in an inconsistent manner with State responsibilities for the conservation of living marine resources under international law.<sup>26</sup>

Data on the amount of the illegal fish caught per year is variable but it was estimated that the profits from IUU fishing are between 15.5 and 36.4 billion a year, which is more than the GDP of some of the countries particularly affected this.<sup>27</sup> IUU fishing is one of the main threats to ocean ecosystems and is increasingly challenging the ocean's ability to sustain human life. IUU fishing pays little to no attention to fisheries management plans

28. Nelleman et al., "The Rise of Environmental Crime - A Growing Threat to Natural Resources, Peace, Development and Security."

and is continuously pressuring fish stocks that have already been exploited by overfishing or illegal fishing activities. It has also been noted that often people that work on these vessels work and live in terrible conditions and are denied the possibility of leaving these areas.

## A Transnational Organized Crime

29. Nelleman et al., "The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources."

Wildlife offences enrich international criminal groups, enable corruption to flourish and threaten domestic and transnational security. Fraud, counterfeiting, money laundering, and violence are often found in combination with various forms of wildlife crime. The risk involved is low compared to other types of transnational crimes, such as drug trafficking, but the profits are high. Ivory, timber, charcoal, gold, and minerals can be trafficked relatively freely with a series of bribes, falsified or purchased permits, and weak law enforcement.<sup>28</sup>

30. Nelleman et al.

Throughout a number of African and Asian regions, there are many examples of militias, non-state armed groups, terrorist groups, and other criminal networks capitalizing on the exploitation of wildlife and forest resources to fund their activities.

31. Andrea Crosta, Kimberly Sutherland, and Mike Beckner, "Blending Ivory - China's Old Loopholes, New Hopes" (Elephant Action League, December 2015), <https://earthleagueinternational.org/africas-white-gold-of-jihad-al-shabaab-and-conflict-ivory/>

- Dozens of militia groups kill elephants and hippopotamuses, harvest timber, and produce or tax charcoal, all to finance conflict in the Democratic Republic of Congo and in neighboring countries.<sup>29</sup>
- The Sudanese Janjaweed and the Lord's Resistance Army (LRA) poach elephants throughout Central Africa and neighboring countries.<sup>30</sup>
- Al-Shabaab, in the past, has financed portions of its terrorist operations through the trafficking of charcoal and elephant ivory through Somalia.<sup>31</sup>
- The Mozambican National Resistance (RENAMO) has been accused of poaching elephants and rhinos to fund their resurgent insurgency.<sup>32</sup>
- Al Qaeda-affiliated local Bangladeshi separatists and other tribal militias in India have been reported to be implicated in the illegal trade in ivory, tiger pelts, and rhino horns in Southeast Asia.<sup>33</sup>
- Al Qaeda and the Haqqani network have been accused of raising funds through timber exploitation and trade.<sup>34</sup>

32. Nelleman et al., "The Environmental Crime Crisis – Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources."

33. Nelleman et al.

It is now clear that wildlife crime has wide national and international security implications. Criminal networks have become more and more advanced, with the ability to shift operations from one wildlife species to another quickly as trafficking and trade circumstances change. For example, shifting from ivory to pangolins to circumvent enforcement efforts, or shifting to "laundering illegal tropical timber through pulp and paper when customs target round logs or furniture."<sup>35</sup> These criminal networks utilize many varieties of "white collar" crimes as well, including "shell companies, tax havens, internet hacking, dark webs, and fraud."<sup>36</sup>

34. Nelleman et al.

35. Nelleman et al., "The Rise of Environmental Crime - A Growing Threat to Natural Resources, Peace, Development and Security," 9.

The complexity, sophistication, and financial scale of environmental crime, including wildlife trafficking, requires a system-wide strategy that is international, coordinated, collaborative, and truly multifaceted response going forward. Successful efforts will re-

36. Nelleman et al.

37. elleman et al., "The Rise of Environmental Crime - A Growing Threat to Natural Resources, Peace, Development and Security."

38. INTERPOL, "Environmental Crime Programme - Strategic Plan," 2009, 6.

39. Nelleman et al., "The Rise of Environmental Crime - A Growing Threat to Natural Resources, Peace, Development and Security."

40. Nellemann et al., 89.

quire working across organizations, industries, communities, and jurisdictions at the national level, and collaboration among countries, governmental agencies, NGOs, United Nations, and multinational corporations. 37

According to INTERPOL, the role of independent NGOs and activists remains crucial to the future of environmental conservation, whereby "the next big step must be to bridge the divisions that separate law enforcement agencies from the public, the activists, the academics, and the policy makers. If we, the international community, are committed to the conservation of the world's environment, biodiversity, and natural resources, all five elements must work together in harmony."38 UNEP and INTERPOL identify the need for "intelligence driven policing" in order to isolate and target the international enforcement operations needed to combat wildlife crime and environmental crime as a whole.39

This also means that efforts [to combat wildlife crime] must entail targeted intelligence and information gathering on the smuggling routes, actors and causes in order to design the best response."40 –

**UNEP-INTERPOL (2016)**

# PROTECTING BIO-DIVERSITY

## from ourselves, for ourselves

Partner



Laws to protect whistleblowers make serious sense. These laws confirm that it is right to speak up. They make it illegal to punish someone directly or indirectly for reporting a concern about risk, wrongdoing or abuse of power to those who have a responsibility to address it - whether that is their own employer or the authorities. These laws also protect public disclosures via the media about wrongdoing or other matters that the public has the right to know. If we make it too difficult for people to act in the interests of others, we risk not learning about serious problems before it is too late.

According to the UN Global Assessment Report on Biodiversity published in May 2019, up to 1 million species face extinction within decades, not to mention the 60 per cent loss of wild animals we have already experienced since 1970. Stemming this loss and giving the earth time and space to regenerate will take a concerted effort on many fronts, including tackling the human activities behind climate change; the pollution and the over-exploitation of land, water, plants and animals embedded in our economic and global food systems. The UN Report says conservation planning must combat wildlife crime in and outside designated protected areas. This means prioritizing wildlife tracking in the criminal justice system and working with communities and individuals. The Financial Times says “targeted intervention to prevent another cause of rapid decline in many species, the illegal wildlife trade, could give more immediate results.”

Five years ago, under the determined direction of Andrea Crosta, the Earth League International decided to intervene directly to achieve immediate results. WildLeaks is a direct-action project. Like other important civil society initiatives around the world, it takes whistleblowing at face value – that it is about communicating information that may help prevent, stop, or minimize damage and harm. It uses digital technology to offer a safe way for people to provide information about wildlife crime. Yet in so many ways, that is the easy bit. What is so important and why I remain so impressed with WildLeaks, is what they do once they receive the information.

The WildLeaks team takes information seriously; they think always about the safety of their sources in how they receive and handle the communication, in the manner they assess and investigate or share the information,



and in considering what evidence they can rely on in courts. This is the crux of making whistleblowing work. Taking a considered, professional approach that respects the people involved. It raises the quality of the investigation itself and the likelihood of bringing perpetrators to justice, and importantly, it instills confidence in people who can then see that if they speak up, they can have a real impact.

People do not act just because someone tells them it is safe to do so, people act when they think it will make a real difference.

Those who reveal information in the public interest including information about illegal poaching, or the corruption behind the shipping, financing, buying and processing of illegal wildlife products, can easily become the target of retaliation. Retaliation can range from harassment at work, to the loss of a job, or other threats to their safety or the safety of their families. Discrediting the whistleblower diverts everyone's attention away from the veracity of the message. It also serves to silence potential future whistleblowers. It helps the wrongdoers.

Properly understood, whistleblowing is not really about whistleblowers, it is about tackling problems effectively and holding those who have the power accountable for what they do.

Some may call initiatives like WildLeaks a “disrupter,” but that presumes existing systems are working well enough. We all know they are not. In countries where responsible policing is weak, or where there are no laws to protect whistleblowers at work or witnesses in courts, then practical measures like WildLeaks are not just nice to have, they are vital. Wildlife crime is also part of a wider global problem of environmental and bio-diversity degradation. WildLeaks is not a replacement for the governmental and economic systems of law enforcement and accountability that we need nationally or globally, but it is an attempt to reimagine and reboot them. WildLeaks demonstrates that cross border action can happen if there is real commitment. It also serves to remind everyone how important it is to do things right.

The Whistleblowing International Network is proud to count Earth League International as an Associate. WIN connects and strengthens civil society organizations that defend and support whistleblowers globally and we are very grateful for the work that WildLeaks is doing to help people blow the whistle to protect the world's precious wildlife.

**Anna Myers**

*Executive Director, WIN*

*Whistleblowing International Network*

# Beyond Traditional Whistleblowing

## DEFINING WHISTLEBLOWING

41. “Winters v. Houston Chronicle Pub. Co., 795 S.W.2d 723 – CourtListener. Com,” CourtListener, accessed April 14, 2019, <https://www.courtlistener.com/opinion/2369200/winters-v-houston-chronicle-pub-co/>. The term whistleblowing dates to the 7th century from the old practice of the English policemen that, upon a crime, would blow their whistle to alert other officials and the public that a crime was being committed within the area.<sup>41</sup> With time, the term evolved and today there is no unique and universally accepted definition of whistleblowing, but a generally agreed-upon definition is: a whistleblower is a member of an organization who tells police, reporters, or the like, about something (such as a crime) that has been kept secret; one who reveals something covert; or one who informs against another with the purpose of exposing such wrongdoing and who is commonly vested by a statute of rights and remedies for retaliation. In the US, whistleblowing is known best for referring to an employee who alleges wrongdoing by his or her employer of the sort that violates public law or tends to injure a considerable number of people. In many instances, a key aspect of whistleblowing is a loyalty to the truth, regardless of the risks to the whistleblower personally, and a desire to stop harmful actions on behalf of the public interest.

**However, not all wildlife whistleblowers may be covered by these definitions. Since most wildlife crime is coordinated and carried out by organized crime networks, the common definition of a whistleblower is not always applicable.**

Some wildlife crime whistleblowers may be employees that witness a wrongdoing in a lawful context, but this is mainly the case with forest crime or IUU fishing. An IUU whistleblower can be, for example an employee of a fishing company that notices unlawful practices, as overfishing or fishing in restricted areas without the needed permits. However, often, when dealing with wildlife crime, the witnesses are people that are not employees of a certain organization, but rather random individuals that observe or take part in unlawful acts and decide to report the activity, even if reporting the information may be dangerous.

For the purpose of this report a wildlife whistleblower is defined as any person reporting an unlawful act that harms wildlife, forests, or fisheries. **Therefore, the WildLeaks definition of whistleblowing goes beyond the traditional definition and is more inclusive to be able to encompass a wide range of people reporting criminal activity.**

In this context, wildlife whistleblowers can be categorized as internal or external. An internal whistleblower is a member of an organization or an employee who witnesses a criminal activity within the organization or his workplace and decides to act by blowing the whistle. They have easy access to information and are motivated by a desire to do what is right, out of fear of being liable for the unlawful activity committed, by competition with other criminal organizations or possibly by monetary incentives. External whistleblowers are those who are not members or employees of the organization or company, but somehow observe or receive evidence or proof of a crime and decide to blow the whistle. The latter may be, for example, a person who has a personal relationship with a person involved in a crime, an employee working for a shipping company, or a person who just stumbles upon evidence, such as someone who sees a Facebook post offering endangered animals for sale.

**However, the lack of an adequate framework of legal protection, or the lack of a safe space in which to report crimes, often disincentivizes individuals who acquire evidence of illicit acts from bringing the information to enforcement authorities.** When a member of a criminal group decides to blow the whistle on a case of wildlife trafficking, for

1. “ACFE Report to the Nations | 2018 Global Fraud Study,” accessed April 14, 2019, <http://www.acfe.com/report-to-the-nations/2018/>.

example, this person would not feel safe using traditional methods available for whistleblowing as going public may be risky or outright dangerous. In these cases, the person reporting a crime needs a safe environment in which he or she can report the crime. It is for this reason that the WildLeaks Project has proven extremely useful.

## IMPORTANCE OF WHISTLEBLOWERS

43. Emily Becker, “Calling Foul: Deficiencies in Approaches to Environmental Whistleblowers and Suggested Reforms,” *Washington and Lee Journal of Energy, Climate, and the Environment* 6, no. 1 (2014): 65, <https://scholarlycommons.law.wlu.edu/jece/vol6/iss1/4>.  
Washington and Lee Journal of Energy, Climate, and the Environment 6, no. 1 (2014)

Law enforcement and regulators are responsible for identifying crimes and bringing to justice the perpetrators of those crimes; however, evidence highlights how whistleblowers are generally more effective at identifying unlawful acts committed within an organization. A recent report on fraud cases, spanning 125 countries around the world, reveals that whistleblowing is the most common means in which fraud cases are detected, making up 40% of all detected cases.<sup>42</sup> Whistleblowing accounted for more crime detection within organizations more than internal audits (15%) and management reviews (13%) combined.

Ultimately, whistleblowers help expose wrongdoings that might never have been identified by regulators. Even in cases where the wrongdoing would eventually have been discovered by regulators, whistleblowers usually aid identification of the misconduct at a much earlier stage, often resulting in lower cost of investigations and a more timely intervention.<sup>43</sup> Wildlife crime cases tend to be much more difficult to detect than standard organizational fraud cases. Wildlife crimes occur in illicit, hidden settings, through criminal networks and black markets, making the information provided by a whistleblower highly valuable to enforcement authorities who otherwise might have had no leads. Whistleblowers reporting a crime are not only doing a good deed, but also benefiting the wider public. Of all the cases of fraud brought against the American government, as of 2007, 60% of those cases were initiated by whistleblowers. The value of whistleblowing in these cases is quantifiable as they resulted in a recovery of over \$20 billion in taxpayer money.<sup>44</sup>

44. Joel D. Hesch, “Whistleblower Rights and Protections: Critiquing Federal Whistleblower Laws and Recommending Filling in Missing Pieces to Form a Beautiful Patchwork Quit,” *Liberty University Law Review* 6, no. 1 (2011): 4, [https://digitalcommons.liberty.edu/lu\\_law\\_review/vol6/iss1/4](https://digitalcommons.liberty.edu/lu_law_review/vol6/iss1/4).

## LEGAL FRAMEWORK FOR WHISTLEBLOWER PROTECTION

The environmental sector, compared for example to the industrial sector, is hard to regulate and monitor. However, environmental harms, such as wildlife, forest, and fisheries crime, jeopardize the health of ecosystems and fuels numerous other crimes, including money-laundering, corruption, fraud, and so on. As mentioned above, the role of whistleblowers as “helpers” of law enforcement is essential to safeguard, and halt criminal activities committed in the environmental sector. Therefore, the importance of whistleblowers should be recognized and regulated as such. Amongst the various arguments to protect whistleblowers, three main cases can be made. Firstly, whistleblower protection promotes compliance with the law, assisting law enforcement or attorneys in performing their job by providing safeguards for those who identify and report harmful information regarding non-compliance. Secondly, protecting whistleblowers helps avoid negative alternative scenarios. If there was no legal protection for whistleblowers there would be fewer of them. In this scenario, the government, and indirectly the taxpayers, would have to expand their resources used to detect and investigate illegal activities. Consequently, whistleblower protections help prevent excessive expenditures and the loss of whistleblowers. The final reason to protect whistleblowers is simply a sense of fairness: why not protect individuals that are doing the right thing?<sup>45</sup>

45. Peter D. Banick, “Case Note: The ‘In-House’ Whistleblower: Walking the Line Between ‘Good Cop, Bad Cop,’” *William Mitchell Law Review* 37, no. 4 (2011): 4, <https://open.mitchellhamline.edu/wmlr/vol37/iss4/4>.

46. UNODC, "UNITED NATIONS CONVENTION AGAINST CORRUPTION" (United Nations Office on Drugs and Crime, 2004).

**The problem, until WildLeaks came into the picture, was that reporting wildlife crime, unlike reporting corporate crime for example, is extremely dangerous in many countries and whistleblowers may not know if they are dealing with corrupt authorities** Additionally, the somewhat limited whistleblower protections are not consistent globally. This is why it was so crucial to offer a buffer, a middleman if you will, like WildLeaks, to facilitate the sharing of wildlife crime information with trusted authorities, and at the same time, facilitate any applicable rewards for the whistleblowers.

47. Stephen M. Kohn, "Monetary Rewards for Wildlife Whistleblowers: A Game-Changer in Wildlife Trafficking Detection and Deterrence,"

Anonymity, legal protections, and in some circumstances, rewards, are available to whistleblowers reporting fraud, corruption, corporate misconduct, and other violations of law, on behalf of the public interest, including some related to wildlife trafficking. There are several international conventions and national legislation acts that contain provisions aiming at protecting people who report a crime, as these are also important tools to encourage people to speak-out. The following is a list of some of the primary laws applying whistleblower protections (and conventions promoting protection laws internationally), that may be applied to wildlife whistleblowers.

*Environmental Law Reporter*, no. 46 (2016), [http://www.kkc.com/assets/site\\_18/files/reward-wildlife-whistleblowers.pdf](http://www.kkc.com/assets/site_18/files/reward-wildlife-whistleblowers.pdf).

48. "Endangered Species | Laws & Policies | Endangered Species Act," accessed December 4, 2016, <https://www.fws.gov/endangered/laws-policies/>.

49. Vern Buchanan, "H.R.97 - 116th Congress (2019-2020): Rescuing Animals With Rewards Act of 2019," webpage, July 16, 2019, <https://www.congress.gov/bill/116th-congress/house-bill/97>.

- **United Nations Convention Against Corruption (UNCAC)** – In Art. 33 the UNCAC encourages protection of whistleblowers in Party States against "any unjustified treatment;"<sup>46</sup>
- **Council of Europe Civil Law Convention on Corruption** – According to Art. 3 of the Convention, European governments party to the convention must provide appropriate protections for employee whistleblowers;
- **US False Claims Act (FCA)** – Established to target customs violations at US ports; the FCA in its anti-retaliation provision provides whistleblower protections and rewards of a minimum of 15% up to 30% of the sanctions obtained;
- **US Foreign Corrupt Practices Act (FCPA)** – This anti-corruption law prohibits US or international publicly traded corporations from paying bribes to public officials. A person who reports on bribery, prohibited under FCPA, not only is protected by the law but also receives a monetary reward;
- **US Lacey Act** – Makes it unlawful for any person to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any fish or wildlife or plant taken, possessed, transported, or sold in violation of any law or regulation of any State or in violation of any foreign law; includes powerful enforcement mechanisms rewarding whistleblowers;<sup>47</sup>
- **US Endangered Species Act** – Established to prevent extinction, recover imperiled plants and animals, and protect the ecosystems on which they depend; provides whistleblower protections and rewards.<sup>48</sup> and
- **Rescuing Animals With Rewards Act of 2019 (RAWR Act)** – If ultimately passed by the United States Senate, the act would modify the Department of State rewards program to authorize rewards to individuals who furnish information that assists in the prevention or identification of crimes related to wildlife trafficking.<sup>49</sup> This would ensure that wildlife trafficking remains on the list of activities targeted by the State Department's rewards program going forward.

The United States does offer whistleblower protections under the law. The FCPA, for example, applies to reports of bribes paid to government officials who permit illegal traf-



50. Kohn, "Monetary Rewards for Wildlife Whistleblowers: A Game-Changer in Wildlife Trafficking Detection and Deterrence."

51. Stephen M. Kohn, "Rewards for Confidentially Reporting Wildlife Crime" (September 2016), <http://www.whistleblowers.org/storage/documents/wildlife/global%20whistleblowers.pdf>.

ficking in plants, lumber, fish, and animals through their borders. Unfortunately, at least in the US, federal agencies responsible for administering wildlife crime whistleblower protection laws have not taken steps to adequately publicize the laws, implement applicable regulation, or establish effective reporting procedures.<sup>50</sup> Effectively executing the wildlife crime whistleblower laws already in place could trigger a massive increase in the detection of trafficking crimes, according to the National Whistleblower Center.<sup>51</sup> The regulations on whistleblowers currently in place present some gaps that impede an appropriate application of the same. The effectiveness of these laws would be greatly improved through the following steps:<sup>52</sup>

1. Educate wildlife crime whistleblowers within the US and internationally, of the rights, protections, and potential monetary rewards under these laws;
2. Effectively protect whistleblower confidentiality through secure mechanisms for reporting crimes and potential crimes; and
3. Promote partnerships between NGOs and governmental agencies to ensure that whistleblower support, protection, and rewards are well-publicized and properly implemented.

52. Kohn.

**In this context, the WildLeaks Project provides a much needed simple and secure way of reporting environmental/wildlife crimes, accessible from anywhere in the world.**

Enhancing the promotion of whistleblower protection tools by governments, the NGO community, and reporting through WildLeaks, the volume of potential informants could be immense. WildLeaks would be an integral tool to help the Department of State track down these transnational organized criminal syndicates profiting from the exploitation of our wildlife. Most importantly, WildLeaks is a neutral platform that creates anonymity and protection for "whistleblowers" who may be involved in an illicit context or are simply not members of an organization that would be protected by traditional whistleblower statutes and regulations.

## EMPOWERING WHISTLEBLOWERS TO HELP PROSECUTE ENVIRONMENTAL CRIMES

Thanks to advocates and far-sighted policy makers, we now have laws and treaties to address most of the world's most pressing environmental problems, whether carbon pollution, deforestation and trafficking in imperiled fisheries and wildlife. Unfortunately, treaties depend largely on domestic laws for implementation and many of these laws are unenforced. Criminal syndicates routinely cause grievous damage to the earth's life support systems with little or no consequence.

Those who commit environmental crimes earn billions of U.S. dollars annually from their corrupt activities and thus have virtually no incentive to voluntarily bring themselves into compliance, especially given the low rate of prosecutions with meaningful penalties. Oftentimes the environmental criminals are part of sophisticated networks, also trafficking in people and drugs and engaging in terrorism and other kinds of extreme violence.

Putting together a viable law enforcement strategy requires a heavy focus on gathering evidence that can be used in court. That's where whistleblowers come in. In the U.S. legal system, whistleblowers have been employed effectively to win large-scale prosecutions for securities fraud, tax evasion and government contracting fraud, but to date the opportunity to deploy them to combat large-scale environmental crime has been largely neglected. The U.S. legal framework offers a wealth of opportunity for Non-Governmental Organizations (NGOs) to team up with law enforcement agencies to prosecute environmental crime – including transnational crime – by deploying whistleblowers.

**CONNECTING WHISTLEBLOWERS WITH THE U.S. REWARD SYSTEM** The National Whistleblower Center (NWC) operates a Legal Assistance Program that connects environmental whistleblowers around the world with attorneys who are experts in U.S. whistleblower law. Why U.S. law? The U.S. is only one of a handful of countries that offers rewards to whistleblowers for delivering original information that contributes to successful prosecutions. These rewards, offered in dozens of federal and state statutes, are generally available to whistleblowers regardless of whether they are U.S. citizens. Both environmental and non-environmental reward laws can be used to rein in the corrupt enterprises

that commit environmental crimes. Perhaps the best known of the environmental laws offering rewards is the Lacey Act. Enacted in 1900, the law was initially aimed at trafficking in illegally harvested wildlife. In 2008, it was amended to ban trade in illegally sourced plants. A well-known example of a successful Lacey Act enforcement was the 2015 prosecution of Lumber Liquidators, a major retailer, for importation and sale of illegally harvested timber from the habitat of the Siberian tiger.

Other environmental laws offering rewards to whistleblowers include the Fish and Wildlife Improvement Act, Endangered Species Act (which implements the CITES convention) and Act to Prevent Pollution from Ships (which implements the MARPOL convention).

The U.S. programs through which whistleblowers have delivered the most significant prosecutions to date are outside the environmental arena, although they could be used to rein in criminal enterprises engaged in environmental crimes. Most notable are the False Claims Act, Dodd-Frank Act and IRS whistleblower law. Since 2011, with the help of whistleblowers, federal agencies have collected a staggering \$30.6 billion for the benefit of taxpayers and investors under these three laws. A key part of this success has been the rewards paid from these recoveries to whistleblowers (a combined total of \$4 billion).

It should be emphasized that although these laws have transnational applications, they require a U.S. nexus for the U.S. judicial system to assert jurisdiction. But given the heavy role of the U.S. in the global supply networks that comprise environmental crimes, a U.S. nexus is likely to be present in many cases. Examples of environmental crimes where a U.S. nexus will often be present include:

- Importing illegal wildlife, seafood or timber products in U.S. ports
- U.S. companies bribing foreign government officials
- Providing false information on custom forms at U.S. ports
- Failing to report revenues from illegal activity on U.S. tax forms
- Deceiving U.S. shareholders about efforts to achieve environmental compliance

## STRENGTHENING THE WHISTLEBLOWER REWARD SYSTEM

To ensure that the environmental crimes are fully addressed, additional legislative and agency action will be needed to strengthen whistleblower protections and rewards in the U.S. and around the world. Under many U.S. whistleblower laws, rewards are not mandatory and set no minimum percentage from the government's recovery of penalties. Mandatory rewards with minimums are a feature of all the most successful programs, which is understandable, given that a clear incentive can be key to getting a whistleblower to take the risk of stepping forward.

In the U.S., there are currently two bipartisan bills that would offer a solution to these challenges. The Wildlife Conservation & Anti-Trafficking Act would make wildlife trafficking a violation under powerful organized crime statutes, greatly increase the amount of potential rewards, and mandate that all recoveries be used for conservation efforts worldwide. Additionally, the Rescuing Animal with Rewards Act appears likely to become law by the time of publication. It will authorize the State Department to provide rewards to wildlife trafficking whistleblowers through its successful existing rewards program. This law would reach a broader array of transnational crimes and potentially deliver higher penalties than current wildlife whistleblower laws. On an agency level, there are two key actions needed: better education for whistleblowers and better protections from retaliation. While the U.S. government is well positioned to pursue prosecution once whistleblower information is provided, and while a series of Executive Orders have made clear that wildlife-related crime is a priority, education and outreach to wildlife whistleblowers is often lacking.

The availability of rewards is not well-advertised, and some U.S. agencies charged with administering wildlife programs (e.g., NOAA, U.S. Forest Service) have failed to implement a process for wildlife whistleblowers at all. It is critical that agencies do a better job at educating whistleblowers about how they can avail themselves of protections and rewards. Agencies also must work harder to protect whistleblowers from retaliation. Despite laws against harassment or intimidation, those accused of wrongdoing frequently threaten or carry out retaliation against whistleblowers. One study found that over two-thirds of whistleblowers report experiencing retaliation. Timely and meaningful action by unbiased decision makers within agencies, and access to the courts and a jury of one's peers when administrative processes break down, is fundamental to the success of any whistleblower program. There is a world of opportunity for whistleblowers to aid in combatting environmental crime. But to fully utilize their help, we need to enact stronger incentives for them to take the risk and we need to punish those who would retaliate against them. That's why NWC is working year-round to improve whistleblower legal protections and rewards both in the U.S. and abroad. We stand ready to help NGO colleagues and policy makers in other countries who are working to strengthen their own whistleblower laws. NWC is proud to have a partnership with WildLeaks.

**John Kostyack**

National Whistleblower Center

## Protecting Those Blowing the Whistle

53. Organized Crime Research Brief No. 1 - Witness Protection Programs,” December 21, 2018, <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/rgnzd-crm-brf-1/index-en.aspx>.

54. UNODC, “Victim Assistance and Witness Protection,” accessed April 21, 2019, <https://www.unodc.org/unodc/en/organized-crime/witness-protection.html>.

55. UNODC

56. UNODC

57. Felföldi Enikő, “The rising importance on the protection of witnesses in the European Union,” *Revue internationale de droit penal* Vol. 77, no. 1 (2006): 313–22, <https://www.cairn.info/revue-internationale-de-droit-penal-2006-1-page-313.htm>.

Dependable witness protection programs are proven as essential tools in the fight against national and transnational organized crime.<sup>53</sup> These programs are essential to protecting those who are key to dismantling organized crime groups. As previously discussed, environmental criminal networks and organizations have become sophisticated, agile, and innovative in their approach to wildlife crime – functioning similarly or as part of other forms of organized crime. In many cases, the only way to have an impact on these networks is through the cooperation of one or more key informants from within the networks.

**Even with a tool like WildLeaks providing the opportunity for anonymity for witnesses and informants, reporting environmental criminal activity can be extremely dangerous.** It is well known that intimidation of informants and potential witnesses is a typical characteristic of criminal organizations. Without effective witness protection programs, obtaining and sustaining informant and witness collaboration through a trial is extremely difficult.

The cooperation of victims and witnesses is crucial to achieving successful prosecutions of criminal offenders and dismantling organized criminal groups.<sup>54</sup> – UNODC

According to the United Nations Office on Drugs and Crime (UNODC), “all criminal justice systems have a duty to put in place procedures to provide measures for the protection of persons whose cooperation with the criminal justice system in an investigation or prosecution, puts them, or persons closely associated with them, at risk of serious physical or emotional harm.”<sup>55</sup> UNODC recommends that all countries provide:

- Assistance before and during trial to cope with the psychological and practical obstacles of testifying;
- Protective measures before, during and after hearing or trial for “at risk” witnesses;
- Court procedures to ensure the witness’ safety while testifying;
- A covert witness protection program.<sup>56</sup>

Witness protection is especially important in the fight against organized crime. It is argued that the closed nature of criminal and terrorist groups makes it very difficult to use traditional investigative methods successfully.<sup>57</sup>



# WildLeaks, a Project by Earth League International

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The mission of the WildLeaks Project is to receive and evaluate **anonymous information** and tips regarding environmental and wildlife crimes and transform them into **concrete action**. The purpose of this mission is to prevent environmental and wildlife crime and to facilitate the identification, arrest, and prosecution of criminals, traffickers, businessmen, and corrupt governmental officials behind the poaching of endangered species and the trafficking of wildlife products. **Two important aspects of this project are the system through which whistleblowers are able to submit fully anonymous reports and turning those reported ‘leaks’ into usable information and action in the field.**

There are many risks involved when an individual decides to share sensitive information. This is why the WildLeaks Project began with the implementation of a secure Tor-based online submission and data management system. WildLeaks informs whistleblowers on what may be the risks when revealing the truth and suggests simple ways to preserve his or her anonymity. Should the information submitted be used for an investigation or released to authorities or to the media, the whistleblower, who does not take appropriate action to protect his/her privacy, may encounter personal, social, or technical risks.

When a whistleblower shares sensitive information, there are always some risks involved. To learn more about safety measures to adopt when using WildLeaks, please refer to the Sidebar “How to Safely Blow the Whistle.”

## Tor Technology

1. The Tor Project Inc, “Tor Project: Overview,” accessed July 4, 2020, <https://www.torproject.org/about/history/>

**The Tor Technology is free software for enabling anonymous communication.**<sup>1</sup> The name is derived from an acronym for the original software project name “The Onion Router.” Tor directs Internet traffic through a free, worldwide, volunteer overlay network consisting of more than seven thousand relays to conceal a user’s location and usage from anyone conducting network surveillance or traffic analysis. Using Tor makes it more difficult for Internet activity to be traced back to the user, including visits to websites, online posts, instant messages, and other forms of online communication. Tor’s use is intended to protect the personal privacy of users, as well as their freedom and ability to conduct confidential communication by keeping their Internet activities from being monitored.

Many individuals use various Tor Hidden Services, including the Tor Browser, to access the internet and communicate anonymously. Journalists use Tor to communicate more safely with whistleblowers and dissidents. Non-governmental organizations (NGOs) use Tor to allow their workers to connect to their home website while they are in a foreign country, without giving away that they are working with that organization.



## HOW TO SUBMIT INFORMATION TO WILDLEAKS

WildLeaks is an online platform that is easily accessible from any location. The procedures to submit a leak are briefly described below in three steps.

### STEP 1



To report on an illicit act of wildlife crime a person needs to first install the Tor Browser and then visit [www.wildleaks.org](http://www.wildleaks.org) and click on the orange Submission Button. This leads to a secure Tor-based platform where the person reporting can submit information or files.

Although it is possible to submit information to the WildLeaks Tor-based platform without installing the Tor Browser, to be completely anonymous, the user has to install the Tor Browser, available also on the WildLeaks webpage, and then use it to connect with WildLeaks and make a submission.

The Tor Browser allows the user to obscure his/her traceable IP address when browsing the Internet, when downloading or uploading files, or when signing in to a web email account (e.g., Hotmail, Gmail, etc.). When using this browser, the connection is not only secure, but also anonymous – leaving no trace behind.

### STEP 2



After accessing WildLeaks' secure servers, the user will be taken to a simple page where he/she will be asked to describe the information and circumstances that is being reported; attach files such as pictures, videos, or documents; and finally submit everything to WildLeaks.

### STEP 3



Following the submission, the whistleblower will receive a unique receipt number. This number is very important because it allows connection to WildLeaks again, in a secure and anonymous way, should the person need to:

- > Add more information about the original submission; Send a
- > message to WildLeaks; and/or Interact with WildLeaks'
- > specialists in an anonymous way.

Through this number, an open secure line of communication is initiated. Indeed, WildLeaks can also provide feedback to the whistleblower or ask for additional informationn.

## Other Options for Submitting Information Securely & Anonymously

For whistleblowers that are unable to utilize the WildLeaks platform, WildLeaks offers alternative methods to submit reports as confidentially as possible. These include the following:

1. Set up an **anonymous encrypted email service using ProtonMail.ch** and then send us an email to: [wildleaks@protonmail.ch](mailto:wildleaks@protonmail.ch)
2. Use **Threema, a versatile app for your smartphones** that encrypts all your communications end-to-end including messages, group chats, files and even status messages.
  - A phone number or email address is NOT required to use Threema, a unique feature that allows the Threema user to be completely anonymous.
  - After the app has been installed, in order to connect to WildLeaks anonymously just send your Threema ID to **wildleaks@protonmail.ch**, and a WildLeaks representative will get back to you from the organization's Threema account.

### How to Safely Blow the Whistle

Wildlife crime whistleblowers considering submitting information to WildLeaks must ask themselves the following questions to ensure that the information reported can be useful or to assess if they are ready to actually submit information:

- Am I the only person who has access to the information that I want to submit?
- If the submitted information reaches public attention or is used in an investigation, will anyone ask me about it?
- Is the information directly traceable to me and me alone?
- Can I handle the psychological pressure of an internal or external investigation about the submission?
- Am I leaving technological traces that could be discovered?

To better protect whistleblowers, WildLeaks provides guidance to help ensure the safety and anonymity of individuals submitting reports, including:

1. Do not disclose the intention to submit or the fact that sensitive information was submitted to anyone.
2. If the information is released to and reported by public media, be extremely careful when expressing any opinion or disclosing further information with anyone.
3. Be sure that there are no surveillance systems in the place where the information is acquired or reported.
4. Do not search the internet for the information submitted to WildLeaks as this could reveal prior knowledge.
5. Avoid all technological traces when researching or acquiring the information to be submitted, when submitting the information to WildLeaks, and even when downloading the Tor Browser (<https://www.torproject.org/>).

## OUR PARTNER:

### GLOBALLEAKS



1. “Hermes Center for Transparency and Digital Human Rights,” Hermes Center for Transparency and Digital Human Rights, accessed July 6, 2020, <https://www.hermescenter.org/home/about-mission/about-us/>.

Globleaks is an open source project developed by the Hermes Center for Transparency and Digital Rights<sup>1</sup> aimed at creating global, anonymous, censorship-resistant, secure, and easy to use whistleblower platforms. Globleaks was designed with flexibility in mind and with maximum privacy and security standards.

The **mission** of the **Hermes Center for Transparency and Digital Human Rights is to promote and develop awareness and attention to the issues of transparency and accountability within the society.** The goal is to increase the involvement of citizens in the management of issues of public interest, and strengthen the active participation of public and private employees in the correct management of the companies they work for.

Technological protection actions can be the most difficult aspect for WildLeaks users to understand due to the complexity of computing and networking systems. This is why WildLeaks offers further technical advice and instructions on how to download and use the Tor Browser, as well as the WildLeaks submission system.

The WildLeaks submission system was developed using Tor technology exclusively. This technology has been integrated into the WildLeaks platform using whistleblowing software developed by our partner organization, Globleaks.

The Tor Browser allows people to navigate the Internet anonymously. It utilizes a chain of proxies that work together to hide a user’s original IP address (his or her Internet identity). It is considered the best technology for digital anonymity available to Internet users and academics. Information technology security experts continuously revise the software to ensure continued anonymity.

In partnership with the Hermes Center for Transparency and Digital Rights, **The WildLeaks Project has been designed from the beginning to mitigate, as much as possible, the risks associated with environmental and wildlife crime whistleblowing.** To that end, ELI is currently working with technology experts to develop a secure WildLeaks smart phone application. This would make it possible for whistleblowers to submit leaks in real time. Since it is not easy to guarantee anonymity through a smart phone, ELI is taking time to develop an application that will meet the same security requirements as WildLeaks’ web-based submission system. WildLeaks will not ask whistleblowers to risk their anonymity and safety through a subpar application, so the release date is still to be determined.





It is important to notice that **Earth League International and WildLeaks do not release unfiltered data and information onto the web and do not pander to media headlines.** Instead, information received through WildLeaks is used to facilitate action in the field by both NGOs and governmental agencies first and foremost.

In many instances, the leaks provide WildLeaks with enough information to begin a field investigation, in which case the data may not be released to the public at all until the investigation is complete. The information is only shared with applicable law enforcement agencies and partners on the ground. **Unlike most other “leaking” organisations Wildleaks works with assertive law enforcement agencies who are not corrupt and considers them partners (rather than enemies) in bringing wildlife and forest criminals to justice!**

## WHAT IS DONE WITH THE LEADS & LEAKS RECEIVED

As information is received through WildLeaks, all data is scrupulously assessed and validated by a vast network of wildlife trafficking experts, investigative reporters, and former law enforcement officers. The process includes the use of various methodologies and checks to determine the quality, validity, and potential for action of the data received. Depending on the quality of the content, the information is classified as one of the following grade levels:

**GRADE 1**  
**LEAKS**

The submission includes enough information and/or data, including attachments, to fully understand the issue and to allow immediate action, either from ELI teams or through the collaboration with law enforcement agencies.

**GRADE 2**  
**LEADS**

The submission includes interesting and relevant information but without enough detail to immediately trigger action. Further information and corroboration may be researched and investigated.

**GRADE 3**  
**MESSAGES**

The submission is interesting but too general and often without concrete evidence or details. A considerable amount of research or investigation may be performed, or the information is shared as it is with the most relevant recipient(s).

## CONCRETE ACTION

Once leaks, leads, and messages are received, assessed, and validated, the next priority is to identify the next step – what action or actions can be taken to address the crime reported. It is always the Project team’s ultimate goal to facilitate the identification, arrest, and prosecution of criminals, traffickers, businessmen, and corrupt governmental officials behind wildlife crimes. This lofty goal begins with identifying solid leaks that either provide enough information to report the crime directly to trusted authorities or lead to a full investigation by ELI and/or its partners.

When there is a confluence of information coming from WildLeaks submissions, and possibly from other sources, the ELI team applies the RISE™ methodology to determine those next action steps. The **RISE™ methodology** is a collaborative working approach based on four important principles intricately linked to each other with intelligence at its core: Research, Intelligence, Sharing, and Enforcement.

- **Research:** A research phase to identify the key elements of information received in order to: 1) decide how critical an issue is, 2) identify potential allies and collaborative partnerships, and 3) determine what is the most cost-effective approach to further operations.
- **Intelligence:** This refers to additional intelligence gathering and then planned investigative activities utilizing best practices, conducted by professionals, and applied to wildlife crime. WildLeaks data potentially contributes to both the identification of intelligence needed and the investigative plan of action.
- **Sharing:** The findings from the Research and Intelligence phases are shared using potentially two different end products, with potentially two different recipients: 1) Redacted reports of investigation findings to inform the public and policy makers, and 2) Confidential Intel Briefs (CIBs) prepared for trusted security agencies that are typically shared a few weeks before the censored reports go public.
- **Enforcement:** This final phase lies in the hands of relevant government and law enforcement agencies. The information shared via the CIBs, prepared and disseminated by ELI, is ideally used to disrupt wildlife criminal activities and arrest the individuals behind these crimes.

The RISE™ methodology has proven to be extremely effective because it is context specific for each location, type of crime, and players; best-practices oriented; results-oriented in that it helps to truly disrupt wildlife criminal activities; and always collaborative. Ultimately, collaboration is most crucial to achieving the desired results in this fight against wildlife and forest crime.

Specific actions by Earth League International, partner NGOs, and associated governmental agencies vary significantly on a case-by-case basis. Many of these actions, and the people involved in the work, must be kept confidential for security purposes. .

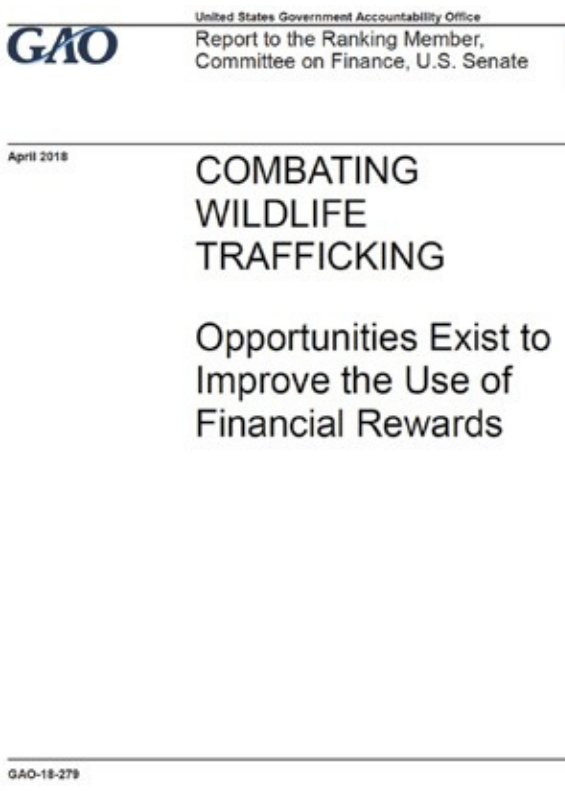
## The GAO Report

### COMBATING WILDLIFE TRAFFICKING Opportunities Exist to Improve the Use of Financial Rewards

The U.S. Government Accountability Office (GAO) is an independent, nonpartisan agency that works for Congress. Often called the “congressional watchdog,” GAO examines how taxpayer dollars are spent and provides Congress and federal agencies with objective, reliable information to help the government save money and work more efficiently.

GAO was asked to review FWS’s and NOAA’s use of financial rewards to combat wildlife trafficking. Andrea Crosta, the director of Earth League International and WildLeaks, was interviewed in order to get first-hand experience on wildlife crime and whistleblowing applied to wildlife crime.

This report examines (1) laws that authorize FWS and NOAA to pay rewards for information on wildlife trafficking and the extent to which the agencies paid such rewards from fiscal years 2007 through 2017, (2) the agencies’ reward policies, (3) information available to the public on rewards, and (4) the extent to which the agencies reviewed the effectiveness of their use of rewards.



GAO reviewed laws, examined FWS and NOAA policies and public communications on rewards, analyzed agency reward data for fiscal years 2007 through 2017 and assessed their reliability, interviewed FWS and NOAA officials, and compared agency policies and public communications on rewards to federal internal control standards.

GAO found that these agencies have not prioritized offering rewards, and they have paid few of them—27 rewards in 11 fiscal years, totaling about \$205,000. It made seven recommendations to these agencies, including telling the public about the possibility of rewards and reviewing how effectively the agencies are using rewards.

The full report, published in May 2018, can be found here: <https://www.gao.gov/products/GAO-18-279>

# Our Investigations Fed by WildLeaks Submissions

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## BLENDING IVORY IN CHINA

In early 2015, WildLeaks received a leak of a document from Hong Kong customs showing the details of three legitimate Chinese companies involved in an ivory seizure. This leak was very precise and raised concern over illegal ivory entering the legal Chinese market – illegal ivory being laundered through a legal market. Another leak followed after a few months, this time with a video showing illegal ivory within China. These leaks were the impetus for an undercover investigation in mainland China and Hong Kong. The resulting investigation exposed the areas where illegal ivory opportunistically enters the legal ivory market, and where China's legal trade system and legal businesses are exploited to launder illegal ivory onto the legal market. The investigation was performed over a 10-month period in 2015. ELI investigators conducted multiple field missions to Hong Kong and to mainland China using various stories to garner meetings with ivory traders and other industry insiders.

Following the investigation, a Confidential Intelligence Brief (CIB) was submitted to authorities in both mainland China and Hong Kong.



Ivory trafficker in Beijing, China, filmed by our investigators

While performing this investigation, ELI's Executive Director, Andrea Crosta, and a few of his team members, were filmed as part of the feature documentary *The Ivory Game*, now available on Netflix. The documentary, produced by Terra Mater Factual Studios and Microsoft Co-Founder Paul G. Allen's Vulcan Productions, in collaboration with Leonardo DiCaprio, chronicles the incredibly vital battle to save the world's elephants.



## ELI & WILDLEAKS' POWERFUL "BLENDING IVORY"

INVESTIGATION FEATURED IN THE LEONARDO DICAPRIO PRODUCED

### DOCUMENTARY *THE IVORY GAME*

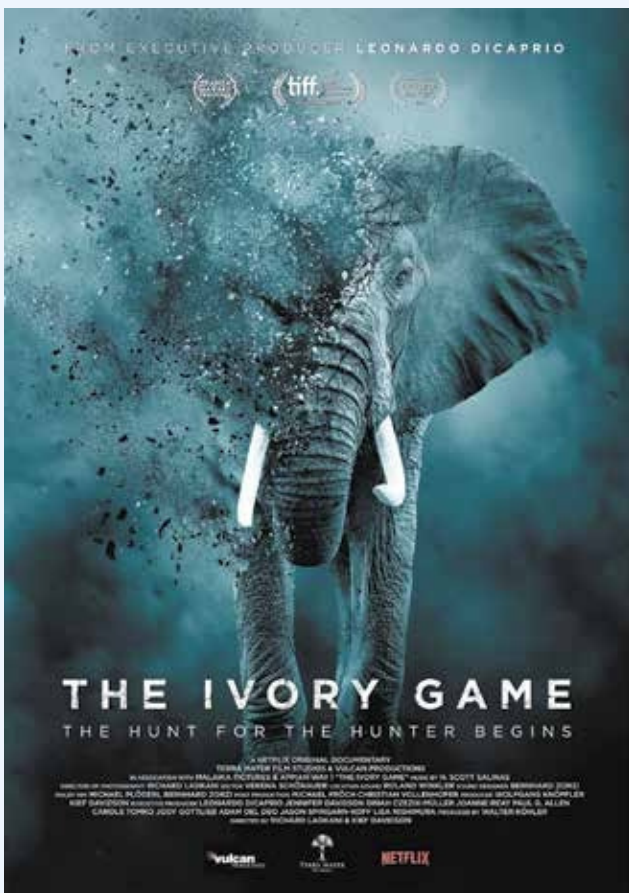
*The Ivory Game*, available on Netflix, features the co-founder of Earth League International (formerly Elephant Action League) and the whistleblowing initiative WildLeaks, Mr. Andrea Crosta, among other protagonists, as it reveals the dark and complex world of the ivory supply chain.

Mr. Crosta, following leads received through ELI's Project WildLeaks, and a team of undercover investigators embarked on almost a year-long investigation in both China and Hong Kong in 2015, uncovering how legal businesses are involved in the laundering of ivory and other wildlife products. It is footage from this undercover investigation, along with investigative team interviews, that are featured in *The Ivory Game* film narrative, allowing viewers to experience the ivory trade in China first hand.

The lucrative ivory trade supports organized crime, facilitates corruption, and flows back to Africa where it enriches warlords and tempts impoverished soldiers into poaching. It has caused rampant poaching of elephants, leading to possible extinction within our lifetimes. *The Ivory Game* chronicles the incredibly vital battle to save the world's elephants.

Through this film, viewers have a front row seat to the fight to bring down poachers, traffickers, and corrupt government officials. Mr. Crosta believes viewers will "understand the magnitude and complexity of international ivory trafficking, and the undeniable role that China has in both the extinction and the survival of the elephants. China has the means to stop the slaughtering of elephants now, but only if it chooses to act."

Interestingly enough, *The Ivory Game* was chosen as the Best International Long Documentary at the Beijing International Film Festival (BJIFF) in China. Although a special version of the documentary was produced for showcase in China, it is important to note that Mr. Crosta's reference to the Chinese President, Xi Jinping, as the individual who holds the destiny of elephants in his hands was not removed by censors. This was a big win for ELI, and all those fighting to shut down the ivory trade, as Chinese attitudes toward ivory are changing and a total ban on ivory sales is now being implemented by the Chinese government.



## TROPHY HUNTING UNLAWFUL ACTIVITIES

### Green Mile Safari in Tanzania

In May 2016, WildLeaks received multiple videos showing illegal and cruel examples of trophy hunting in Tanzania, committed by the safari company Green Mile. The shocking videos by Green Mile showed hunting with automatic weapons, having children hunt with automatic weapons, gunning down fleeing animals from moving cars, capturing baby animals and torturing dying ones, and using bait and lights at night to attract unsuspecting animals – all illegal acts.

Green Mile Safari, controlled by Abdullah Bin Mohammed Bin Butti Al Hamed of Abu Dhabi, was originally barred from Tanzania in 2014 after prior videos emerged showing dozens of instances of wildlife crime called “shocking,” “horrific,” and “abhorrent” by media outlets. In 2016, Green Mile was allowed back into the country, given a new hunting permit, as well as a large land concession on which to continue their appalling behavior.



Images taken from the videos sent to WildLeaks

WildLeaks publicized Green Mile’s return to Tanzania and launched a global campaign to educate the public and force Green Mile to shut down its operations for good.

Following the campaign launched by WildLeaks, #Stop-GreenMile, Humane the Society

International and the International Fund for Animal Welfare – IFAW NL, along with the US Ambassador to Tanzania, called on the Tanzanian government to revoke its decision

to renew Green Mile Safari’s hunting permit. In February 2018, Tanzania’s Natural Resources and Tourism Minister, Hamisi Kigwangalla, released a list of operators and owners of hunting blocks and officials in the ministry accused of supporting poaching syndicates – that list includes Green Mile Safari Co. Ltd.



Minister Kigwangalla blamed the suspects whom he said had paralyzed for a decade the country’s national parks, protected areas, and game reserves. Dr. Kigwangalla, speaking to reporters, said: “The suspects along with their associates will first undergo a thorough inquiry by the ministry’s special task force... I have potential incriminating evidence and I want them to appear before the task force for questioning.”

In August 2019, Tanzania did revoke Green Mile Safari’s hunting license. The Tourism Minister cited violations of wildlife hunting regulations, including killing of wild animals not specified in its hunting license.

# WildLeaks



In 6 years:

over **300**  
submissions



around **70**  
interesting/useful



## Trophy Hunting in South Africa

In July 2016, WildLeaks received a leak indicating that a hunter has been organizing trophy hunting parties for years on the border between South Africa and Mozambique. They kill animals illegally in various way, including luring wildlife outside of Kruger National Park (leopards, lions) and using fake census data and bribing officials to raise their quotas. According to the whistleblower, scouts told him first-hand that they had to pull decomposing meat along the border fence, as well as pull the fence up and push meat into Kruger National Park, then pull it back into Mozambique to a bait station where a hunter, who had paid thousands of dollars, would be sitting in a hideaway waiting to kill any animal that follows the bait.

## 2017 Rhino Horn Auction in South Africa

WildLeaks received a leak containing pictures of rhino horn lots from the first legal rhino horn auction in South Africa. The auction was held by private rhino horn owner John Hume in August 2017 and the details – pictures, pricing, and number of lots sold – have never been made public. South Africa legalized the sale of rhino horn domestically that same year.

The pictures received by WildLeaks show clearly that some of the pieces for sale were very small, just a few grams. These small pieces would not be considered trophies – something possibly desired by South Africans. Instead, given that the auction website was translated into both Vietnamese and Chinese, it is much more likely that they were marketed for illegal export to the Asian market.



Vietnam and China are the primary consumers of rhino horn, with the supply coming largely from significant poaching in southern Africa. Vietnamese and Chinese buyers can legally purchase rhino horn in South Africa, but technically cannot take it out of the country. Once bought legally, though, it is unlikely that the South African government would be able to effectively monitor the movement of the rhino horn.'

Like with legal ivory markets in other countries, a local legal market in South Africa only serves to fuel demand in the Asian market. Worse, it offers a mechanism to launder illegal horn that has been poached through the legal market, especially small pieces of rhino horn like those found in these screen shots. These small pieces of rhino horn were plainly prepared for the Asian traditional medicine market and for illegal export to Asia.

This leak particularly highlights how legal loopholes are used by international traffickers to acquire, move, and sell wildlife products – of particular interest and focus for ELI's larger investigative activities in both Southern Africa and Asia.





## LEAKS SHARED WITH LAW ENFORCEMENT AGENCIES

The following are examples of leaks received through WildLeaks that were directly shared with law enforcement. The ELI team makes every effort to share leaks only with law enforcement agencies that are trusted, willing to accept the information, and, when possible, able to act immediately on the information provided.

### Endangered African Bird Feathers Trafficked to the United States via U.S. Mail

**Subject:** Illegal African Feather Trade

**Submitted Leak** (edited):

*I'm a Native American traditional artist, so I work with feathers for ceremonial and cultural purposes. Lately I have been seeing a growing number of people importing protected species from these taxidermists and individuals from Africa. Hundreds of hornbills, turacos, eagles, hawks, secretary birds, etc... are being shipping to the United States and Canada, and being distributed amongst ebay, and the Native American community. Many of these sellers are using CITES permits, but I know most of these are coming from poached birds, and going through licensed taxidermists, using recycled CITES permits, and they are simply sending them via mail, and not registering them through the proper wildlife ports. The items which are turning up on ebay from American sellers who are getting them supplied from Africa, is just the tip of the iceberg in this feather trade. It's scary to see exactly how many birds are turning up for sale yearly. I'm most concerned about those Crowned Eagles, you shouldn't simply be able to send someone 100 dollars and get the skin in a few weeks via mail.*

**Attachment:** A short list of individuals selling these poached birds (text and pictures).

#### Comments

This was the first leak ever received by WildLeaks, right after the launch of the online platform in 2014. ELI shared the leak with U.S. authorities, but was unable to determine if or how the information was used by the receiving agency. Unfortunately, this is an example of wildlife trafficking that is not typically found in the news. It is continually happening below the radar of media, but is just as serious in its contributions to the extinction of many bird species as poaching is to the extinction of many other species.

## Bill of Lading for Multiple Shipments from the Mombasa Port to Asia

**Subjec :** Shipping documents from Kenya

### Submitted Leak

*I am not aware of Kenya exporting cotton goods to Thailand. Doesn't Thailand produce its own cotton. This document [appears] as being forged by our office.*

**Attachment:** Scan of a Bill of Lading with additional handwritten info about a shipment of containers from Mombasa Port to Thailand (for security reasons we can only show a part of the document).

Release From Date	Time	Release To Date	Time	Return Date	Time	Load Ref.
2014-06-04	13:47					
						MRKU 41545980
						MRKU 3496371
2014-05-30	15:41					MRKU 4254769
						MRKU 12577510

### Comments

Received in June 2014, this was an important leak that highlights not only the crucial role in wildlife trafficking played by a few African seaports, but also how a bill of lading can be forged to hide the real content of shipping containers, as well as the real destinations. In this case, the leak was initially shared with an international government organization that unfortunately did not act on the information. As a result, ELI decided to share it with U.S. authorities who managed to determine that this bill of lading for a shipment of three containers on a single ship to Thailand was actually hiding six containers on three ships to three different Asian ports. Authorities were not able to intercept the most significant portion of the suspected illicit cargo, but the leak was described as very important and informative by the authorities.

This leak shows just how important it is for WildLeaks to reach and be available to officers, clerks, and other staff working at shipping companies and ports of call – ports are the locations where shipments of wildlife products are generally consolidated and create opportunities for interception.

## Shipment of Container from Thailand to Emirates Via Oman

**Subject:** Orangutan, gibbons, and sugar gliders being shipped from Bangkok to Oman soon.

**Submitted Leak:**

*A big shipment is coming from Bangkok into Oman very soon (within a week or two). The receiving person at the airport in Oman is Mr [redacted] Tel: [redacted]. Apparently, [he] is receiving 50,000 AED per crate/box to clear them at the airport. After that, they get transported to Dubai across the Hatta border. The buyers in Dubai own a pet shop at the new Dubai market [redacted]. The store name is [redacted], and their names are [redacted]. They are huge dealers.*

*The shipment will contain an orangutan, gibbons and sugar gliders, likely shipped with ducks and dogs. An orangutan and nine gibbons have already been received in Dubai and are being offered for sale. Unfortunately, a flight number is not available.*

**Comments**

This leak highlights the well-known illegal live “pet” trade of wildlife from Asia to the Emirates and Saudi Arabia. ELI shared this leak with U.S. authorities, giving them the difficulty of finding reliable law enforcement agencies in Oman and Dubai. Unfortunately, this all took place at the same time as the death of the King of Thailand. All business basically stopped for a period of time following the king’s death. The shipment was most likely postponed, and ELI lost track of the shipment altogether.

## TROPHY HUNTING & CRIME

In a handful of African countries, including, among others, South Africa, Tanzania, Zimbabwe, and Namibia, trophy hunting is legal and has been for many decades and spanning many eras of the conservation story. Legal trophy hunting is regulated through the use of government-issued licenses to harvest specific species and quota-approved numbers of animals determined to be sustainable by a governmental management entity. The hunting season usually falls within a specific timeframe during each calendar year. A trophy animal is generally considered to be an older male of a species past breeding productivity; the actual 'trophy' is a body part that is preserved from the trophy animal (skin, skull, horns, tusks, etc.) after it is killed. Alternatively, 'poaching' is unlicensed, illegal hunting of any kind and can be both specific – elephants for tusks, rhinos for horns – and indiscriminate – large scale bushmeat poaching using snares – in its destruction.

The financial value of trophy species varies by country and is also determined by a government-recognized management authority. These values or rates vary substantially between local licenses and tourist licenses, with the latter being considerably more expensive. Individual hunters and hunting parties visiting African safari destinations from overseas typically pay tens of thousands – if not hundreds of thousands – of dollars (USD) for licenses, fees, taxes, transportation, accommodation, and taxidermy expenses. They purchase the opportunity – no guarantee – to harvest and export a trophy (or trophies) that meets, in theory, the legal requirements of both the source country and the country to where the trophy is to be exported.

Trophy hunting is not immune to various forms of exploitation of the theory and of the laws governing its practice. In the field, the act of hunting requires self-imposed, highly ethical standards from 1) the professional hunter in charge of a safari, 2) the government representative overseeing a hunt, and 3) the tourist hunter actually pulling the trigger. At the national level, the allocation of hunting concessions and determination of the off-take quotas are often not transparent and influenced by corruption.

Furthermore, the export and import laws moving hunting trophies around the world have created yet another avenue for the laundering of elephant ivory, rhino horn, and other wildlife products into primarily Asian markets. Wildlife traffickers exploit hunting permit loopholes and use paid hunters to bring "trophies" into the import country and, as ELI discovered in China (see the Blending Ivory report), launder those products into the legal market as well as the black market. For example, it is estimated that approximately 300 rhino horns were exported out of South Africa by "pretend" hunters since 2009.

To begin to combat these practices, in 2015, the Chinese government imposed a ban on the import of elephant trophies from African countries and the US Fish and Wildlife Service extended a ban on the import of elephant trophies from Tanzania through 2015, and from Zimbabwe indefinitely. Unfortunately, the Trump Administration reversed the elephant trophy bans in 2019. Regardless, it is hoped that the availability of WildLeaks will allow more individuals to report crimes around trophy hunting.

\* IFAW, "Killing for Trophies: An Analysis of Global Trophy Hunting Trade" (International Fund for Animal Welfare, June 14, 2016), [http://www.ifaw.org/sites/default/files/IFAW\\_TrophyHuntingReport\\_UK\\_v2.pdf](http://www.ifaw.org/sites/default/files/IFAW_TrophyHuntingReport_UK_v2.pdf).

## LEAKS REPORTED TO DATE

In 6 years of the WildLeaks Project, despite the lack of funding to properly advertise it, over 300 submissions have been received, of which roughly a quarter were assessed as interesting, a dozen instigated or contributed to investigations, and over 25 were reported to partner NGOs, law enforcement authorities, or media partners, or a combination thereof.

WildLeaks has received information about wildlife crime from over 30 countries, including China, Hong Kong, South Africa, Zimbabwe, Mozambique, Kenya, Tanzania, India, Finland, Russia, Thailand, Laos, the US, Mexico and Brazil.

The following section contains descriptions of many leads and leaks submitted through WildLeaks since its inception. These submissions were received through WildLeaks' on-line Tor-based platform, as well as through the use of encrypted email messages. Note that some information has been redacted in order to avoid any possible identification of the whistleblower.

Additionally, readers must understand that not all submissions, primarily depending on the grade of the submission, are fully assessed and/or pursued by the ELI team. The following pages contain all grades regardless of whether the submission resulted in action. The purpose here is to provide the reader with an in-depth idea of the sort of information received by WildLeaks and the significant potential of the WildLeaks project.

## Smuggling of African Grey Parrots from Nigeria to Lebanon

### Submitted Message

*I am writing to you from (redacted). We received a report about the regular smuggling of African Grey parrots (*Psittacus erithacus*) from Nigeria to Lebanon, with the complicity of members of the Lebanese community living in Nigeria, such as travel agents, freight forwarders, employees of MEA (Middle Eastern Airlines) used to ship the birds. We did not receive any additional details. This species has suffered a massive population decline in Nigeria, currently only extremely low and scattered populations are reported although there appears to be an ongoing illegal trade from Cameroon. There is no CITES export quota for *P. erithacus* from Nigeria. Thanking you in advance.*



Grey parrot

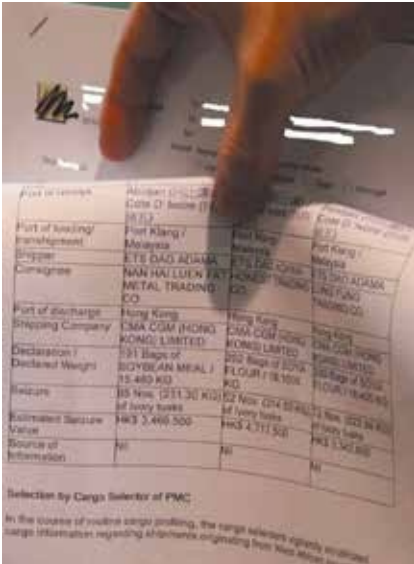


## Ivory trafficking into the Port of Hong Kong: Customs internal document

### Submitted Message: Hong Kong Customs Internal Document

A picture of Hong Kong Customs report showing the details of a seizure of elephant ivory.

### Comments



On the 11th of February, 2014, an anonymous leak was shared via WildLeaks detailing specific information about the illegal transportation and importation of African elephant ivory into the port of Hong Kong.

Three companies based in Hong Kong, and one in mainland China, specializing in businesses that typically are not associated with importing produce from African countries, were listed on an official form from Hong Kong Customs as the consignees to accept a shipment of soya beans from Cote d'Ivoire. At the same time, Hong Kong Customs authorities reported the confiscation of a highly publicized shipment of illegally imported ivory with an estimated value in excess of \$3.5 million.

To date, it is not clear whether Chinese authorities acted on this information. Are any of these four companies actually involved in the smuggling of ivory? Has anyone been prosecuted or have any prosecutions resulted in fines or custodial penalties? Have the Chinese authorities been able to identify other imported goods used to smuggle ivory and/or new players supporting the illegal market in Hong Kong or mainland China?

## Tiger Poaching in Sumatra

### Submitted Message:

*Tiger poacher opening killing Sumatran Tigers and selling Tiger parts on the street. Authorities are being paid to turn a blind eye. According trappers tiger named Heri, aged 45 years, is estimated tiger caught on 1 - January 3, 2014, in the village of Sei Tengar mangrove forests. they took it from trapping locations, on January 4, 2014, and was immediately taken to the village teluk palas for skinned and sold. dated January 8, 2014, we were contacted by (redacted), about the case of this bondage. Subsequently, on 9 January 2014, we went to the location from the city of Medan, North Sumatra. We immediately met with three actors bondage tiger, at bay palas hamlet, village (kepenghuluan) Pasir Limau Kapas, Rokan Hilir district, Riau Province. In the transaction, we demonstrated that tiger bones have been dried. They sell it at a price of whole bone Rp30 million / \$ 1 = Rp10 thousand (weighing 5 kilograms). However, most of the bones are missing, including fangs and nails. While the tiger skin, they keep (not shown to us) because they are asking for a higher price. These actors 3 have sold tiger skin and bones 3 times, during the year 2012-2013. I have photographs if interested.*

## Illegal Killing of Wolves Around Yellowstone National Park

### Submitted Message

*Would like to report a fairly large effort of extreme trophy hunters surrounding Yellowstone Park who are targeting, baiting and killing the more famous celebrity wolves out of the park for bragging rights and bounty. Baiting is not only illegal, but this climate is intentional intimidation of the Yellowstone staff and tourists. They have bragged on social media that they intentionally kill the wolves slowly and have posted pictures. I have been told that inboxes of Yellowstone staff and followers of Yellowstone have been filled with these pictures and videos.*

*A key player is (redacted) who runs Facebook page (redacted). (Redacted) teach wolf hunters how to use GPS technology (illegal) to track the popular research wolves, and then use meat or the sounds of puppies to bait them out of the park to be shot (illegal). The likelihood of a hunter being in the vicinity of a wolf who just wandered a few yards out of the park, in that vast of an area, is not high. Record numbers of celebrity wolves are being brutally killed with pictures going viral on the internet, this is sabotage of the Yellowstone tourist income as well. (Redacted). There are many other wolf-hunting sites which brag about poaching and teach others how to do it, called shoot shovel and shut up. They have threatened to do the same to environmentalists. They often brag that they have connections with local law enforcement and government officials. They are rarely if ever taken seriously or prosecuted.*

## Lusaka Airport, Zambia

### Submitted Message

*I have no idea if this is of any value given that I have no proof but only the impression of something being odd. Anyway here it is in the hope that a flag is raised. There is a South African aircraft engineer, named (redacted), he previously worked in Douala, Cameroon, at Lusaka Airport. I happened to hear a conversation about small aircraft arriving and leaving from/to Lusaka and South Africa in the early hours of the morning. Seems unusual to me.*

### Comments

This is a good example of a submission that does not contain enough information to be useful. Submissions like these may be about something interesting and worth investigating, but without additional information ELI would not be able to start an operation - the organization is too small to assign assessment and investigative teams to all submissions. ELI did try to activate a few contacts in Zambia, but with so little information nothing resulted from the attempt.

## **Baiting & Poaching of Lions & Leopards in South Africa**

### **Submitted Message**

*For about 5 years Mr. (redacted), a professional hunter operating on (redacted) in the Maputo province of Mozambique has been hunting a variety of animals, buffalos, elephants, lions and leopards. I (redacted).*

*Mr. (redacted) has been sighted and filmed before with can lion hunting some years ago. (redacted). The scouts told us that they had to pull decomposing meat along the fence and push the fence down and put the meat into the Kruger, and pull it back into Mozambique, and then pull the meat up to a bait station, either a carcass tied up in a tree for leopard of meat dangling on a rope for lion. The hunter who had paid thousands of \$ would be sitting in a hide overlooking the bait.*

*I have facts, documents, permits etc about (redacted) when he is allocated 10 buffalo to hunt in a year, shots up to 40, more leopards and lions allocated etc etc, firearms being smuggled into Mozambique and the list goes on.*

## **Pangolin Skin for Sale**

### **Submitted Message**

*I got this email, please investigate:*

*Subject: Cashew nut/African products for sales Dear Sir/Madam, We are the above mentioned Agricultural cooperative group here in cote d' Ivoire west Africa that has the following both Animal and Agricultural products in large quantities for sales such as fresh passion fruits, pine apples, mangoes, Shea nut/butter, dried coconut, coconut shell, palm oil, palm kernel nut/oil, palm kernel meal, palm cakes, cumin seeds, Coffee beans, cocoa beans, raw cashew nuts, natural honey, white and yellow maize, fresh ginger and fresh green plantain/ banana, Teak/Gmelina woods of high qualities in good conditions. For Animal products we also have the pangolin skin, griffonia seeds available, so if you are interested in any of the above mentioned products based in your request kindly revert back to us as soon as possible. For serious and genuine buyers are highly welcome. Waiting for your co-operate response, Best Regards. Mr. (redacted). +225(redacted), +225(redacted), (redacted)@gmail.com, (redacted)@gmail.com*

## Seizure of turtles in the Comoros

### Submitted Message (originally in French):

*These are live turtles called star tortoise that have transited through Hahaya (Comoros), Saturday 05/31/2014, and the Comoros customs seized them. These turtles come from Madagascar. It seems that the final destination was South East Asia. There are 1014 turtles.*



## Overheard Conversation About Rhino Trafficking in Uganda

### Submitted Message: Entebbe Airport – Possible Trafficking



*At the end of January 2019, whilst sitting in the departures lounge I overheard someone talking on the mobile phone about the value and availability of rhino horn in Uganda. Attached is a photograph of the person I overheard.*

#### Comments

This is another example of an interesting observation, but with too little information for meaningful action.

## Documents on South African Lawyer Close to Rhino Traffickers

### Submitted Message

*Some documents for the involvement into defending poachers and also the webpage concerning the rhino horn auction.*

Attachments: 4 files (not shown for security reasons)

#### Comments

ELI is currently involved in an ongoing investigation related to this leak.



## Caged Quetzal in Mexico

### Submitted Message:

*I saw a caged quetzal at a private residence in Queretaro, Queretaro Mexico. I asked if it was a quetzal bird, because I wasn't sure that there were solid blue variations. The owner said 'yes'. It's being kept outside in a large cage to the right of their front door (facing the house). You can see it and hear it from the street. They do have a gated parking area for security, but it can be easily seen. They have a business of (redacted). The name is (redacted) Phone number: +52(redacted). The address is: (redacted).*

## Comments

This is a good example of a message with enough information provided for ELI to act. The information was shared with Mexican law enforcement, but with very little hope for follow-up on their part. Unfortunately, this is also an issue far too small for ELI to expend further effort. WildLeaks was envisioned and created to receive submissions about more serious environmental crime, but with additional manpower and funding, less significant situations like this could be addressed more adequately.

## Ivory & Timber Trafficking in Mozambique

### Submitted Message:

*We have good reason to believe that the family of public officer (redacted) is involved in ivory trafficking. Recently, 5 traffickers were arrested and 1 of them during the interviews mentioned that he works closely with (redacted). (Redacted) from Nampula.*

*In a separate case. The illegal logging/trucks passing through Gorongosa, Mozambique is beyond, it's way out of control, happening right before all our eyes. That's the old news. This article came out yesterday – <http://clubofmozambique.com/news/sofala-chinese-companies-worried-about-limits-on-wood-processing-and-exporting/>.*

*I believe understanding who these top guys meeting with government are (who is the association) could be extremely helpful. These may be some of the top guys involved in illegal timber, and more. You will notice another link here to the (redacted).*

## Baby Gorillas, Kangaroos & Lemurs for Sale in Mexico

### Submitted Message: Group of people selling baby gorillas, kangaroos, baby tigers and baby lemurs in Morelos, Mexico

The information came from a woman named (redacted) who claims to be a (redacted) in Mexico.

*"Lots of trafficking of exotic animals here but have been unsuccessful with PGR, PROFEPA, y La Fiscalia even Semarnat nobody wants to help trap and stop these people." "The animals being sold here are from South Africa, Japan, China, Australia, and other countries. They are being brought here to Mexico and sold on the black market here in Mexico and probably other countries. There are silverback baby gorillas, kangaroos, albino baby tigers, and snakes, and lemur babies." "The veterinary in control of this specific group of trafficking is located in Morelos, (redacted). They have a location where they meet the buyers in (redacted) but I was (redacted). There are 5 of them, 2 women and 3 young guys that are armed all the time. I have the (redacted)."*



### Comments

Mexico plays a significant role in wildlife trafficking in Latin America. It functions as a trafficking hub for wildlife, often in combination with other transnational organized crime. As a result, it can be dangerous to investigate wildlife trafficking in Mexico. Mexico is also home to many captive wildlife breeders. Captive wildlife breeders offer a means for traffickers to launder wild animals through the legal trade.

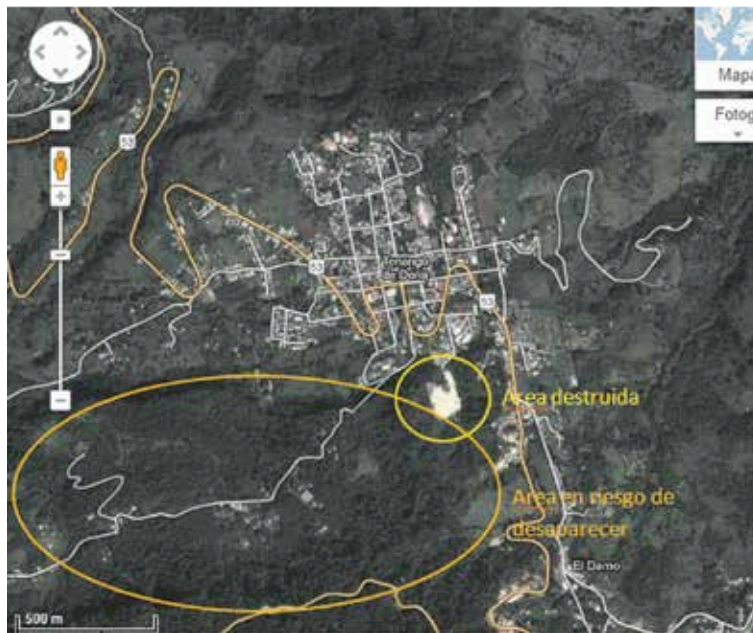
ELI was not able to ascertain whether this group actually had a baby gorilla.



## Deforestation in Mexico

### Submitted Message:

*Illegal parceling of forest in Tenango de Doria, Hidalgo, Mexico leads to loss of habitat for many endemic species and affects the population of the town and region nearby.  
Attached audiovisual material.  
All information is in Spanish.  
We can work on a translation if needed.*

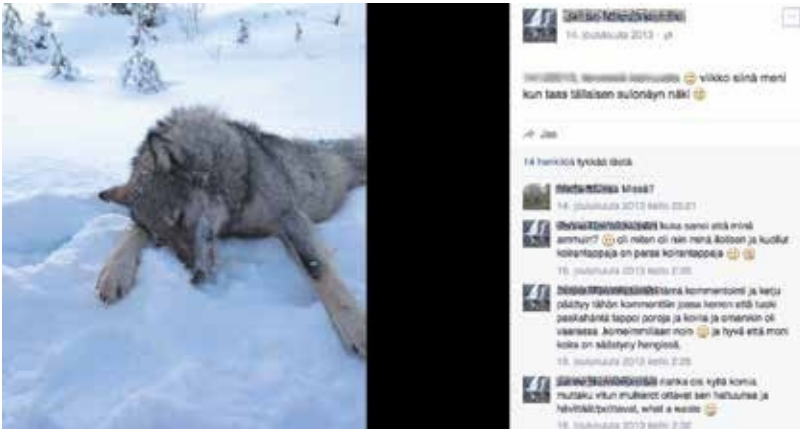


## Poaching in Finland

### Submitted Message: Illegal trapping of wildlife in Finland

On 25.12.2015 I came across a location in a forest in Finland where multiple animal traps were present and set; several smaller cages to trap meso-predators such as raccoon dog, badger, fox, and one large cage which is of main concern. This cage contained as bait a dead raccoon dog and some added unidentified intestines. The cage can easily trap for instance a wolf or lynx, although the latter probably doesn't feed on dead animals. In addition, there was a place with lots of animal carcasses, mainly badgers, raccoon-dogs, moose skin and some moose feet. These remains were covered by a metal netting, such that birds of prey can still feed on them (e.g. golden eagle, sea eagle and goshawk).

Nearby were 2 shooting places, of which one of them was aimed at this dead animal's 'storage'. Also close-by was a storage of all kinds of animal intestines in an open plastic barrel.



The location of this place is here and in the very near surrounding forest (< 100m): N 6878932 E 351898 this is in ETRS-TM35FIN coordinates. This is in Finland in the Ruovesi municipality. Underneath the main powerline between the hills Kivimäki and Isomäki near the hamlet of Hanho. The ownership of that particular land is not known to me. I did not like to hang around the area too long, so I've only done a short sweep of the nearby forest and took a few quick pics, which I will add here.

#### Attachments:

- Picture 25122015\_1 shows the large trap with a raccoon dog as bait (the trap was in the forest approximately 25m east from the location with the dead animals)
- Picture 25122015\_2 shows a few of the dead animals under the netting (2 badgers and multiple raccoon dogs)
- Picture 25122015\_3 shows a more of the dead animals under the netting (at least 3 badgers and multiple raccoon dogs and moose remains)
- Picture 25122015\_4 more of the location with the netting, moose skin and other animal parts
- Picture 25122015\_5 the whole setting with all the carcasses

#### Comments

This and other similar leaks about Finland were shared with a Finnish NGO.

## Well-known Kenyan Figure Involved in Ivory Trafficking

### Submitted Message:

*Ms. (redacted), former wife of (redacted) and (redacted), is behind ivory smuggling from Uganda to Mombasa, storing ivory in (redacted) in Mombasa.*

### Comments

The person mentioned in this leak is a very well know public figure in Kenya. WildLeaks shared with trusted contacts in Kenya but was unable to understand if law enforcement found and checked the warehouse in Mombasa.

## Trafficking of Chimpanzees in Liberia

Submitted Message: Captive chimpanzees in Monrovia, Liberia



*We received information of two captive and caged chimpanzees in Monrovia. I am in contact with the informant in-country, so if you need additional information about this case, please let me know.*

*Files description: The email of the informant (name removed) reads as follows: Dear all, I want to report the below, I've heard from two of my friends that they saw two chimpanzees locked up inside a cage by the road in Congo Town area under the sun and rain without any shelter, not even sure if they are provided with any good or water I wish you can help.*

Attachments: Maps and pictures



## **Ivory trafficking in Mozambique**

### **Submitted Message: Pemba Sawmill & Ivory Smuggling**

*I received a tip from a contractor that works in construction in Mozambique that the (redacted) sawmill is being used for ivory smuggling.*

*This is not necessarily new news but to have to come through an unrelated channel like my contact could mean there is something to this.*

*(Redacted) is the company, Mr. (redacted) is involved and had many port workers on his payroll.*

## **Comments**

ELI sent a team to Pemba, Mozambique, to investigate this leak and found information that confirmed it.

## **Illegal logging in Malawi**

### **Submitted Message: Illegal timber cutting of Mulanje Cedar**

**(Widdringtonia whytei)**

*I am currently a Peace Corps Volunteer serving on Mount Mulanje. Mulanje Cedar (Widdringtonia whytei) is an endemic species and has been illegally harvested for years. It is also one of the few existing African conifers and has been recognized by the IUCN as critically endangered. I have seen this species being illegally harvested on top of the mountain and have also seen it being transported down the mountain through the village that I live in.*

*Corruption is rampant in Malawi and I am positive that all of the "forest guards" who are supposed to be protecting the Cedar are taking bribes to allow the illegal trade to keep flowing. I have brought the issue up with many people in the village, but people are scared to talk about it because it can almost be equated to illegal drug trafficking. People know that it's going on all of the time but don't want to get involved in fear of retaliation. I am also working with (redacted) in trying to stop this problem before all of the Cedar is gone. I would love to hear your expertise on this subject because I feel like I am running out of ideas. The main issue is trying to find out who exactly is running the illegal trade and where the majority of the timber is being sold. Any advice would be greatly appreciated.*

## Exposing of Poaching Crime in Laikipia

### Submitted Message

*I have been assisting a friend to run a news website, based at Laikipia county in Kenya. This is one county, often referred to as the Texas of Kenya because of the booming ranching business, in these ranches one finds a wide array of wildlife hence making the county a poacher's magnet.*

*In the last one week 4 rhinos are feared dead, many elephants could be getting killed, but the KWS will never highlight such information probably they deem it image damaging, what lacks in the fight against poaching in my home county is a media outlet with enough guts to expose poaching business in Laikipia, because of lack of resources to do so.*

*With my basic training in journalism and a one-year experience in running a blog, I have the capability of exposing the information hidden under the carpet, if I have the right resources. Looking forward to getting a response from your end.*

### Comments

WildLeaks also receives submissions from individuals who are not looking to necessarily remain anonymous, but rather looking for help or collaborations. This shows that there are many people around the world looking to expose wildlife crime – they just lack the resources or may be afraid to try anything alone. ELI responds to these requests, assessing the information offered, and determines if and how it can help. It is important, though, to be very mindful of the dangers associated with these situations and never push people to do things or take risks on ELI's behalf.

## Illegal Wildlife in Bahrain

### Submitted Message: Lion and large wild simian in home in Bahrain

*The son of prominent (redacted), who owns the (redacted) is keeping illegally trafficked, endangered wild animals at his father's home. The simian has already bitten off the finger of the of the sellers. The house is a huge yellow house in a compound next to an enormous pink house near the Bahrain Saudi Causeway. It can be seen easily from the King Fahd Highway. Those poor animals!*

### Comments

Again, this submission provides too little information for ELI to take any action. Additionally, Bahrain is a country where investigating would be fruitless given that many prominent individuals are basically untouchable.

## **Destruction of the Ecosystem in the Baikal Region**

### **Submitted Message: Translated from Russian (partial text)**

*The Transbaikalia territory, in Mogocha district, village Amazar. The Amazar river, the first major tributary of the Amur River after the formation of the merger Shilka and Argun , plays an important role in the Amur ecosystem. This place is the maximum concentration of fish in the Transbaikal Salmoniformes primarily Siberian taimen - a species introduced in the International Red Book and the IUCN Red Data Book of the Trans-Baikal region. On Amazar and its tributaries are 5 of 7 large settlements Mogochenskogo area, and the surrounding forests are home to traditional forest inhabitant's taiga settlements and potential resource base for the development of the forest industry.*

*It is these natural resources - the river and the forest, on which depends the life and development of the entire region, more than 10 years ago attracted the attention of businessmen from China. Back in 2002, Chita Region and Heilongjiang Province started a new pulp mill project - with a different technology, other investors, and more volume of production. In 2009 a new investor arrived ("Xing Bang ") with 2 billion yuan from China Development Bank. In 2011 they built a sawmill and began to build housing for the plant, and on the eve of 2013 started construction of a dam on the river Amazar. In 2012 the pulp mill received the status of "priority investment projects in the forestry sector" of Industry and Trade, which will give the (edited) access to vast areas of forest lease without auction. The company publicly promised to cook 1million 150 thousand cubic meters of wood per year needed to produce 240,000 tons of pulp. However, the documentation of the (edited) project from 2010 indicated significantly greater volumes - bringing the power plant up to 400,000 tons of pulp per year and export of 590,000 tons of wood (more than 1 million cubic meters of timber). According to experts, raw material for the production complex should be sufficient for harvesting more than 2 million cubic meters of wood per year.*

## **Comments**

ELI found additional data that confirms the information in this submission but was unable to get enough evidence to publish anything about it.



## Dead Tiger Cubs for Sale in Vietnam

Submitted Message: Screenshot

### Comments

Given the volume of wildlife products sold online, ELI receives many messages about allegedly illegal sales of wildlife on many different websites. Again, ELI attempts to look into these sites and/or publish the screenshots, but it is difficult in most instances to determine legality or whether the products being sold are that of wild or captive bred animals.

## Pangolin Scales for Sale Online

Submitted Message: Screenshot

**OLX** Login Sell your item

Ads Bushbuckridge > Office & Business Bushbuckridge > Inventory & Stock Bushbuckridge

**Trustworthy Solar Dealers**  
Our Free Dealer Finder Will Help You Locate Your Nearest Solar Installer. [Visit Site](#)

**Pangolin scales for sale**  
Bushbuckridge, Ehlanzeni, Mpumalanga Added via phone at 12:27, 17 May 2017.  
Ad ID: 1005269010

**R 3,000**  
Negotiable

[Send message](#)

**+27 73 166 9322**

Bushbuckridge, Ehlanzeni, Mpumalanga  
[Show on the map](#)

**Kingsley**  
On site since Jul 2016  
[See their other ads](#)

**Kingsley has verified:**

[Mark as Favourite](#)  
[Print](#)  
[Edit](#)  
[Report](#)

[AdChoices](#)

Offer from **individual**

I got pangolin scales 160kg for sale

## Trafficking of Feathers from China

### Submitted Message: Bird poachers in China

*Seller on eBay, selling hundreds of items annually made from poached eagles, owls, vultures, and hawks. Being shipped internationally without CITES permits.*

*User on eBay with the name of 88yw, and officeasian (eBay store), are selling tons of feather fans and items made from poached eagles, owls, hawks, and falcons, as well as vultures.*

*I am certain Crested Serpent Eagles are CITES protected, as well Asia's vultures, many highly endangered.*



Attachments: Text document of evidence and one picture from and eBay listing

Links:

- [http://www.ebay.com/itm/KongMing-Snake-Texture-Eagle-Feather-Wall-Fan-Chinese-Culture-Vintage-Fan41/261530360264?pt=UK\\_Collectables\\_AnimalCollectables\\_SM&hash=item3ce46c99c8](http://www.ebay.com/itm/KongMing-Snake-Texture-Eagle-Feather-Wall-Fan-Chinese-Culture-Vintage-Fan41/261530360264?pt=UK_Collectables_AnimalCollectables_SM&hash=item3ce46c99c8)
- [http://www.ebay.com/itm/KongMing-Snake-Texture-Eagle-Feather-Wall-Fan-Chinese-Culture-Vintage-Fan41-Big-/261533754156?pt=UK\\_Collectables\\_AnimalCollectables\\_SM&hash=item3ce4a0632c](http://www.ebay.com/itm/KongMing-Snake-Texture-Eagle-Feather-Wall-Fan-Chinese-Culture-Vintage-Fan41-Big-/261533754156?pt=UK_Collectables_AnimalCollectables_SM&hash=item3ce4a0632c)
- [http://www.ebay.com/itm/KongMing-ZhuGeLiang-Big-Eagle-Feather-Wall-Fan-China-Chinese-Culture-VintageFan1-/261503464305?pt=UK\\_Collectables\\_AnimalCollectables\\_SM&hash=item3ce2d23371](http://www.ebay.com/itm/KongMing-ZhuGeLiang-Big-Eagle-Feather-Wall-Fan-China-Chinese-Culture-VintageFan1-/261503464305?pt=UK_Collectables_AnimalCollectables_SM&hash=item3ce2d23371)

## Comments

Typically, ELI publishes these types of eBay pages in order to inform and educate, but, as discussed previously, it is almost impossible to assess the legality of the products.



## Tiger bone wine for sale in San Francisco

### Submitted Message: tiger bone wine for sale in San Francisco

*My background is in wildlife crime- I do undercover work in (edited) with the poaching and trafficking of tigers for TCM. I was in San Francisco last week and went to China Town, as I am worried tiger products are being sold there due to the high rate of ethnic Chinese in that area. I found legitimate tiger bone wine for sale in one of the shops for \$250/bottle. I spoke to the shop keeper who informed me he imports the product from Hong Kong. It was opening being displayed and sold in the store. I reached out to CDFW...they do not seem to want to do their job of enforcement.*

### Comments

ELI shared this information with local law enforcement.



## How to poach pangolins

### Submitted Message: YouTube channel teaching how to poach pangolins

*Cambodian Trap Daily is a YouTube channel that has videos promoting the poaching of pangolins and teaching how to use traps in such a manner*  
<https://www.youtube.com/channel/UCgyPekGft8BmruFnDGIJYQQ/videos>  
[https://www.youtube.com/watch?v=K\\_QZGOWBCaw](https://www.youtube.com/watch?v=K_QZGOWBCaw)  
[https://www.youtube.com/watch?v=\\_bTrGpHUIiQ](https://www.youtube.com/watch?v=_bTrGpHUIiQ)  
<https://www.youtube.com/watch?v=E2mDVRXkkSU>

## **Gold mining operation set to destroy critical Amur tiger habitat within a protected reserve**

### **Submitted message (edited for security reasons)**

*Alexander Batalov, is the reserve manager of Durminskoye Reserve, which is in the Khabarovsk region of the Russian Far East. This reserve is about 200 square miles and it is critical core habitat to about 25-30 Amur tigers and indirectly supports about 100 tigers- the largest population of Amur tigers in Khabarovsk territory. There is evidence that this reserve has gold deposits in it and Mr Batalov has been fighting increasing pressure to start mineral extraction within the reserve for the past 5 years. The Governor of the Khabarovsk Territory has recently signed an agreement with (edited) to develop the gold mining industry in the Durminskoye Reserve. This development project is being directly funded by a US citizen (edited) and owner of (edited), the company responsible for acquiring a permit to mine from the local government. The concern is that this will destroy the tiger's habitat and result in a reduction of the tiger population, of which there are less than 500 left in the world. Khabarovsk Krai is already subject to intense illegal logging pressure, and the impact on the environment and the tigers by this mining project, will be even more considerable.*

## **A college operates illegally in a bird sanctuary**

### **Submitted message**

*A college belonging to a Sharda University, a renowned educational group, has undertaken large scale illegal constructions and continues to operate illegally despite a court order directing its closure in Agra, India. The operation is with connivance of the government officials.*

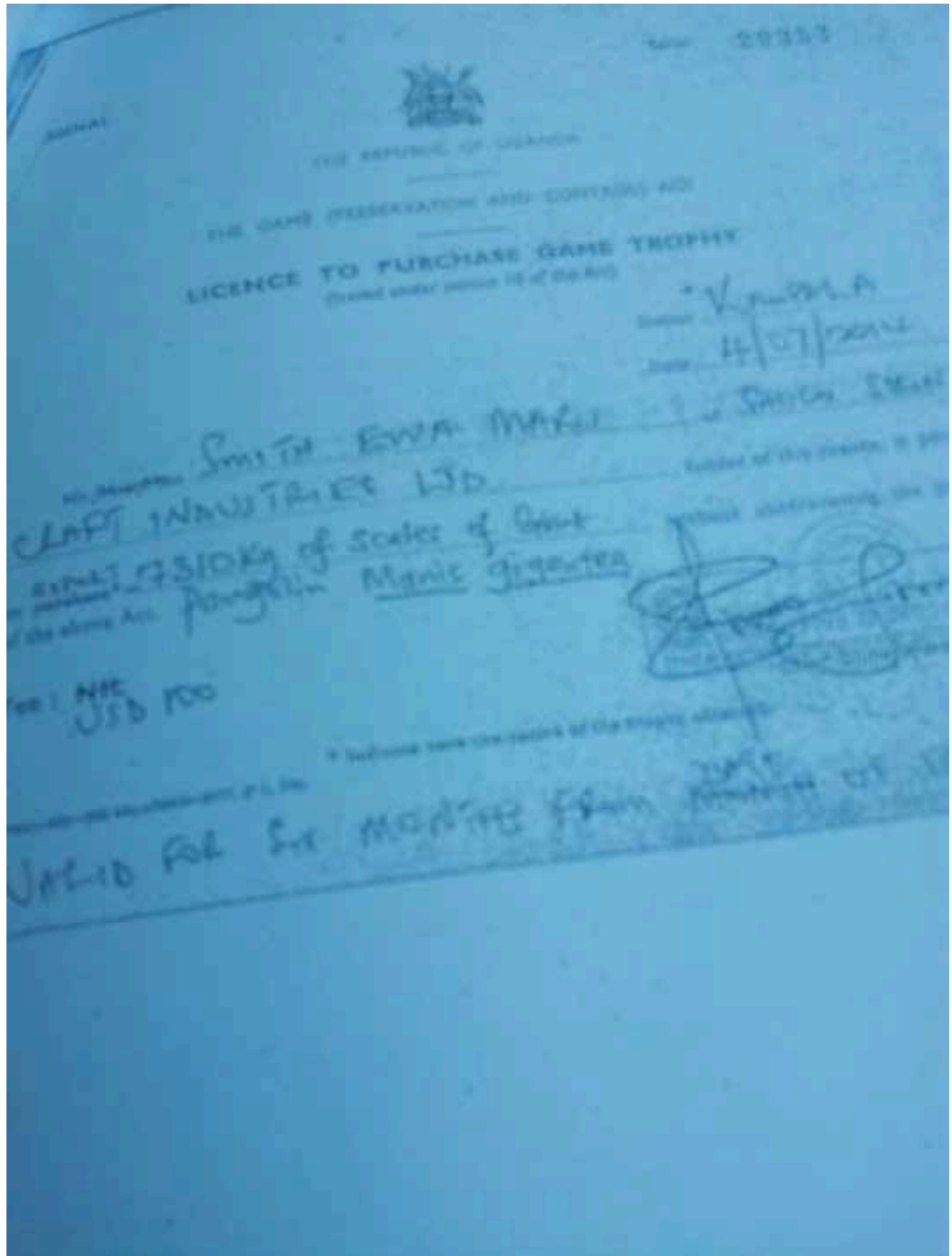
### **Comments**

Too little information and no resources to launch an investigation in India, but ELI did share it with Indian media.

## Pangolin license to export, Uganda

### Comments

The message contained just one document. Further investigation by ELI found a well-known local figure in the trophy hunting industry behind this permit.




## Assessment of Scope of Illegal Logging in Laos and Associated Trans-boundary Timber Trade

A leaked unpublished WWF report dated June 2015, details the extent at which the Republic of Laos is felling its forests, due to demand from neighboring countries, especially China and Vietnam.

The report is available online at [WildLeaks.org](http://WildLeaks.org)





OTHER LEADS



**WWF**

**ASSESSMENT OF SCOPE OF ILLEGAL LOGGING IN LAOS AND ASSOCIATED TRANS-BOUNDARY TIMBER TRADE**



**(AS BASELINE FOR INTERNATIONAL LEAKAGE ESTIMATION)**

**Denis Smirnov**  
June 2015

The image is a cover page for a WWF report. It features the WWF logo at the top left. The title is centered in bold black text. Below the title is a large photograph of a dirt road in a forest, heavily cluttered with large logs. At the bottom of the page, there are three smaller photographs: the first shows a logging truck on a dirt road; the second shows two people standing next to a large log; the third shows a logging truck carrying a large log. Below these photos is the text '(AS BASELINE FOR INTERNATIONAL LEAKAGE ESTIMATION)'. At the very bottom, the author's name 'Denis Smirnov' and the date 'June 2015' are listed.

## Musk deer poaching in the Russian Far East

*The poaching of musk deer in the Russian Far East is unsustainable. Only male musk deer have the gland that is in demand (in traditional Asian medicine and perfume/cosmetics), but the deer are caught with snares, which kill females and males indiscriminately. Talking with poachers and buyers, we discovered that musk glands can fetch about \$500 each for a poacher (about \$45,000-50,000 per kilogram) and demand is highest in China, Hong Kong and South Korea.*

*In the Russian Far East, prices on legal goods, like sable fur, have fallen dramatically in the past few years; with low prices on legal goods, hunters are transitioning to what is valuable and are very aware how much musk deer are worth.*



*The deer in the Primorsky Krai region, are being poached to the brink of extinction. In some place they are allowed to be hunted, but a buyer (based out Mel'nichnoye who sells directly to South Korea from his hunt lease) admitted that he buys about 3 times more musk deer from hunters than given out in licenses.*

*In many parts of the Far East the deer are so endangered that there are no licenses, however this does not deter poachers or buyers. One buyer (in Furmanovo) said that "There are no musk deer licenses in this area, I just buy it. From hunters I buy more than 100 musk deer glands/year — mostly from the north, as the deer in the south are extinct."*

*Corruption in the region is rampant — another buyer (from Olga) said that "The only reason I do what I do is because I work with people in the criminal world as well as members of police".*

*In the town of Roshchino (where the attached picture was taken) locals admitted that government and police know. The people up top are getting huge amounts of money from poaching. Without the collaboration of the government poaching would be not possible.*



**In some instances, WildLeaks receives personal testimonies and statements from well-informed sources who are afraid to communicate what they know publicly or to local authorities.** It is for these well-connected and well-informed individuals that WildLeaks was truly created. WildLeaks provides the means for these inside individuals to share what they know anonymously. It is in these situations that rewards, or some form of remuneration would be most helpful to incentivize these potential whistleblowers to share information with U.S. and other applicable authorities.

The testimony below includes a few examples of information received by WildLeaks from local, informed sources.

## **Wildlife Trafficking & Organized Crime in Suriname**

### **Information and leads for mapping local wildlife traffickers in Suriname:**

Mr. (redacted) is a big poacher in Suriname who took over the wildlife trafficking business recently. He speaks English, Dutch, and has a (redacted), which gives him access to certain groups. (redacted)'s territory in Suriname is between Apura and Dalbana Creek; the upper north-west quadrant of Suriname. He works with Trio indigenous people who work for him with bribes of money and alcohol. The Trios supply animals like frogs, boars, jaguars, tapirs, and deer - dead or alive.

(Redacted) has a link to a governmental ministry and can easily give bribes for everything he wants. He can organize permits (redacted) and can easily re-export them out of the country, legally. This is only possible in Suriname if you have high connections in govern- ment.

(Redacted) they send more animals illegally because they have contacts that open the door (like a (redacted) man named (redacted) who issues them permits). They are working in the Nickerie region of Suriname, shooting and collecting everything and selling to the Chinese. (Redacted) who sold an albino Boesemani for \$150,000 to the Chinese.

Other people like the (redacted) family (company: (redacted)0 and (redacted) (company: redacted), (redacted), (redacted), (redacted), also buy through (redacted) and they export the animals out.

Mr. (redacted) is good friends with (redacted), whose family owns (redacted). Mr. (redacted) is another major Surinamese exporter of wildlife who has own crew. Mr. (redacted) is a person of interest within the wildlife trafficking realm. He's an older Chinese national who came to Suriname decades ago. He drives (redacted) and he's involved in the (re- dacted) business. His company is called (redacted). He's another middleman who asks for quotas of 500 stingrays per person that he buys from, and usually sends out 10,000 stingrays to all the exporters (not sure if this is per year or per quarter).

The president of Suriname's (redacted).

## Jaguar Trafficking for the Chinese Black Market

Since January 2017, we have received information from two other tour guides that local hunters have shot six different jaguars along the East-West road in Suriname. From the Northwest Nickerie and Wageningen region, we heard of eight jaguars and ten smaller cats being sold to Chinese buyers. We believe the Chinese are the only ones willing to pay money for jaguars because it's too "conspicuous" for others to buy.

In early April 2017, two indigenous Maroon boys from a village near Klaas Creek on Afo-baka road (30km from airport) killed a jaguar and posted photos on Facebook to sell the body. A Chinese national bought it for \$1500 within 12 hours of the post. The jaguar was a female that weighed 110 kilos.

Our personal contact (redacted) is a (redacted) ex-police inspector is in his 60s that retired from the Surinamese police. (Redacted) operates within the loopholes of the law, and uses his wide connections to issue permits, paperwork, and so forth for illegal purposes for a number of friends and contacts – including those within the Chinese mafia clan in Suriname.

He told us that at Simon supermarket, a Chinese supermarket in Paramaribo along a main highway, they process jaguars for their parts and meat. They skin the jaguars, crush their bones, make tiger balm, extract the male genitals, and keep teeth whole. The Chinese usually pay hunters approximately USD 800 or more for a jaguar weighing over 100kg. He and game wardens have also told us that there is a Chinese shop on MolenPad road where herbs are being made from jaguar bones.



Although there are roadblocks, the police do not investigate vehicles properly for illegal wildlife, thus, making it easy for illegal transport. The traders use the distribution buses, and occasionally wood logging trucks, to transport the jaguar parts to the supermarkets.

From Suriname, the Inspector says that jaguar parts are being hidden inside round tree logs that are being shipped to China on large container boats. Suriname exports most of their round tree logs to China through Chinese shipping companies.

This local source also explained to WildLeaks how cocaine and human trafficking works in Suriname, typically by Chinese organized crime and others (not published in this report).

# The Future of the WildLeaks Project

## CHALLENGES

Although the WildLeaks Project is unequivocally one of the most innovative and successful initiatives ever launched to fight wildlife crime, there are challenges that may limit the benefits that may be garnered from the project. Many of these challenges can be overcome with education, recognition, expanded budgets, and organizational growth.

### Submission Challenges

- Not all potential whistleblowers are tech savvy enough to effectively use WildLeaks.
- In many instances, whistleblowers provide too little information, incomplete information, or information that is not significantly important or relevant, therefore further action is not possible. **WildLeaks is designed to receive and follow up on a few important, legitimate, and validated leaks per month**, therefore not all reports lead to further action although they are always filed and archived for possible future use or sharing.
- In some instances, the information provided by a whistleblower may be interesting and important, but there is no way to effectively act on the leak (e.g., inaccessible location or country, the information cannot be validated, the leaked information is not illegal, etc.).

### Operational Challenges

- WildLeaks is managed by a small organization with limited resources and cannot therefore act on too many leads at one time – additional experienced analysts are needed.
- WildLeaks is still not a well-known tool or is not well understood.
- Although some NGO partners tend to provide follow-up reports to our organization when leaks or leads have been shared, not all of them provide the same kind of feedback, therefore it can be hard for ELI to follow-up on the actions taken after a lead has been shared. **There is still a considerable amount of competition and lack of trust among environmental organizations. This impacts the overall achievement and success in fighting wildlife crime and it may be the reason for so many failed attempts.**

## NEEDS

### **Growth – Funds, Resources, & Staff**

In order to fulfill its mission and become an important player in the fight against environmental crime, ELI and its WildLeaks Project needs to grow. This includes acquiring more funding, marketing and communication resources, and experienced staff to be able to appropriately assess all meaningful submissions. The following is a list of specific needs.

- WildLeaks is a new approach for combatting wildlife crime, so it requires ongoing education, marketing and public relations, financial support, and additional partners and resources.
- WildLeaks is managed by a small NGO with limited resources, hence the collaboration with other NGOs and local organizations would be extremely important to be able to act on as many leads as possible.
- WildLeaks is still a relatively new project which is not well known, its existence and how it works needs to be well-publicized for it to work properly. This would require significant investment in awareness campaigns and the development of media partnerships in the targeted countries.
- It takes time and exceptional performance to become trusted by potential whistleblowers, partners, and law enforcement authorities. WildLeaks needs to inspire people to share sensitive information and for people to trust that an appropriate response will follow their leak.
- WildLeaks must further develop relationships with target country authorities in order to consistently monitor outcomes;
- Increased collaboration and partnerships with like-minded NGOs

**One crucial word that for far too long has been largely absent from conservation and wildlife protection is ‘innovation.’** Innovation is at the forefront of the WildLeaks Project and Earth League International as a whole. It is this very innovation that offers the huge potential for growth of collaboration and partnerships, as well as the potential for other organizations to use WildLeaks for similar or alternative purposes.

Non-governmental and governmental organizations, and donors, must move out of their comfort zone and invest funds in new ideas and new approaches, which can be risky. Unlike in the business sector where innovation is always fostered and pursued by successful companies, including through partnerships with smaller innovative entities, in the field of conservation there is no such virtual cycle and old models still prevail. As a result, ELI has to work hard to change this paradigm and support its innovation.

## Partnerships

Collaboration and partnerships are crucial to achieve the desired results in the fight against wildlife crime. No single organization, entity, or individual has all the answers, or all the resources needed to tackle this extremely complex problem.

ELI's WildLeaks Project is planning partnership development in the following ways:

- Identifying and working closely with local NGOs in difficult, less friendly countries. Local NGOs are very knowledgeable about wildlife crime in these countries but may find it impossible to report offences locally. Collaboration with ELI and using the WildLeaks platform would allow the export of this important knowledge and lead to action.
- Identifying and working with NGOs in friendly countries on more targeted projects. This would allow more local investigations utilizing native language investigators, local technology and intelligence, and developing relationships with local authorities.
- Working closely with international media outlets to publicize the WildLeaks Project, and how to fight back against wildlife and forest crime.

In support of the WildLeaks Project's strategy to cultivate individual and organizational partnerships, as of the beginning of 2017, WildLeaks initiated small targeted awareness (or penetration) campaigns on social media in countries considered important wildlife crime hubs. The campaigns advertise the project's desire to actively collaborate with citizens and any individuals with knowledge about wildlife crime within or outside the country. The campaigns secondarily promote WildLeaks with potential local or national NGOs and other organizations. These wildlife hubs include countries in Africa, Asia, and Latin America.

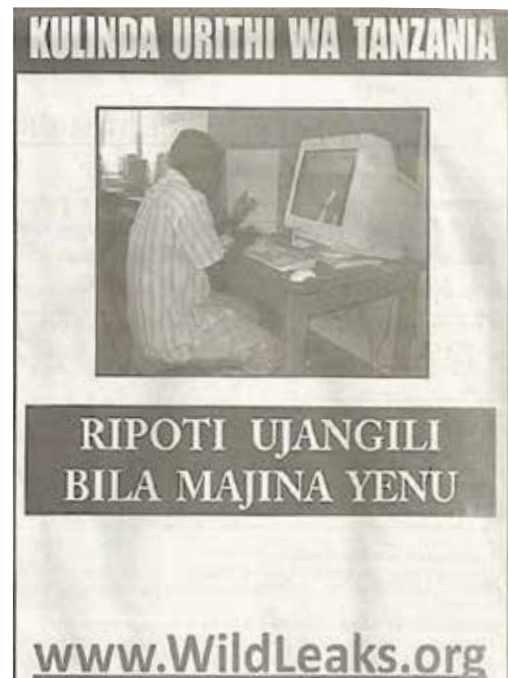


## WildLeaks for Other Organizations

The WildLeaks Project has created further opportunity to broaden its impact by sharing access with other NGOs. The WildLeaks technology platform services, as well as the validation team's services, are offered free-of-charge to other wildlife conservation organizations for use to address their own specific and varying agendas. By promoting the use of WildLeaks, these organizations create opportunities for alternative constituencies to become involved in the fight against wildlife and forest crime and become aware of WildLeaks as an outlet for whistleblowers.

As evidence of WildLeak's value to other organizations, large predators' expert Riku Lumiaro of FANC confirms: "Illegal hunting is a problem in the North and East part of Finland. Poachers kill many wolves and bears every year. It is not easy to find poachers in the large wilderness areas. Without the help from local people it is very rare to catch poachers. WildLeaks gives people of the rural areas the opportunity to send anonymous information about where the poachers operate and who they might be. The authorities have made some successful investigations using crucial information from WildLeaks."

There is significant potential to utilizing the WildLeaks technology platform for reporting many types of crimes. It is the intent of ELI to facilitate the expansion of this 'product' to any organization seeking to provide potential whistleblowers a means to safely share sensitive information.



WildLeaks ads published in Central Africa and Tanzania

## OUR GRAPHIC NOVEL PROJECT

**Earth League International**, in its tradition of innovation and progressiveness, **launched a new and exciting project – graphic novels and comics** designed to spark more awareness and understanding of the complex world of environmental and wildlife crime.

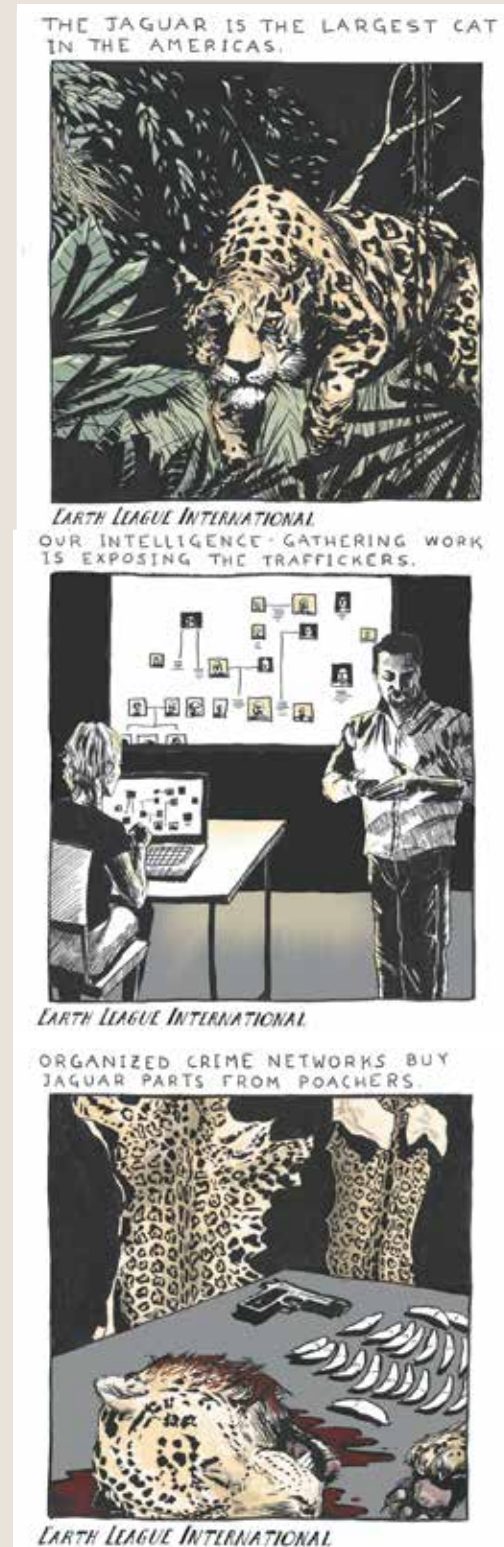
In the spirit of the writing of John Le Carre and comic art of Joe Sacco, ELI's graphic novels and comics depict the organization's covert missions, and the actions of ELI's investigative teams, to expose the underbelly of the world's wildlife criminal networks in a medium combining crime thrillers and comics journalism through a unique environmental lens.

ELI believes it is important to revise the current, outdated narrative around environmental and wildlife crime, currently focused on poachers and end consumers, with a more modern, fact-based narrative that highlights the most important elements of these crimes – the international traffickers, kingpins, organized crime networks, and corrupt government officials.

Given the nature of ELI's work, which is heavily based on intelligence gathering, investigations and undercover operations, graphic novels and comics will be able to show the public exactly what ELI's teams are doing, and how, without jeopardizing field operations and the safety of ELI team members. This project is in collaboration with a talented young artist, a student at Harvard University, Ava Salzman (co-creator and illustrator), with the support of ELI's director Andrea Crosta (co-creator).

Learn more here:

<https://earthleagueinternational.org/graphic-novels/>





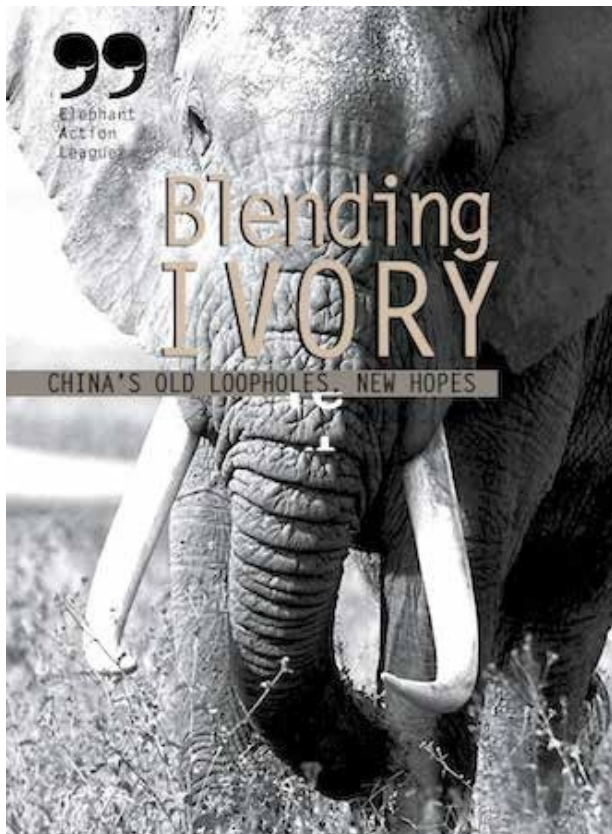
OUTSIDE OF SAN FELIPE,  
BAJA CALIFORNIA,  
MEXICO.

ON A CLEAR DAY,  
WE TOOK QUADS OUT TO  
THE BEACH AND DROVE  
UP AND DOWN THE COAST  
OF THE SEA OF CORTEZ.



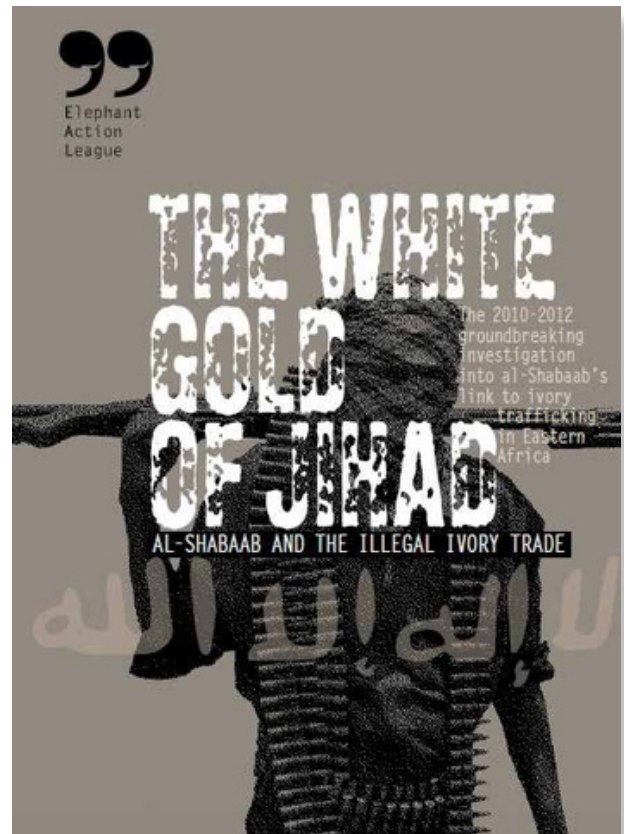
WE WERE LOOKING  
FOR THINGS THAT NOT  
MANY PEOPLE KNOW TO  
LOOK FOR.

## Our past reports



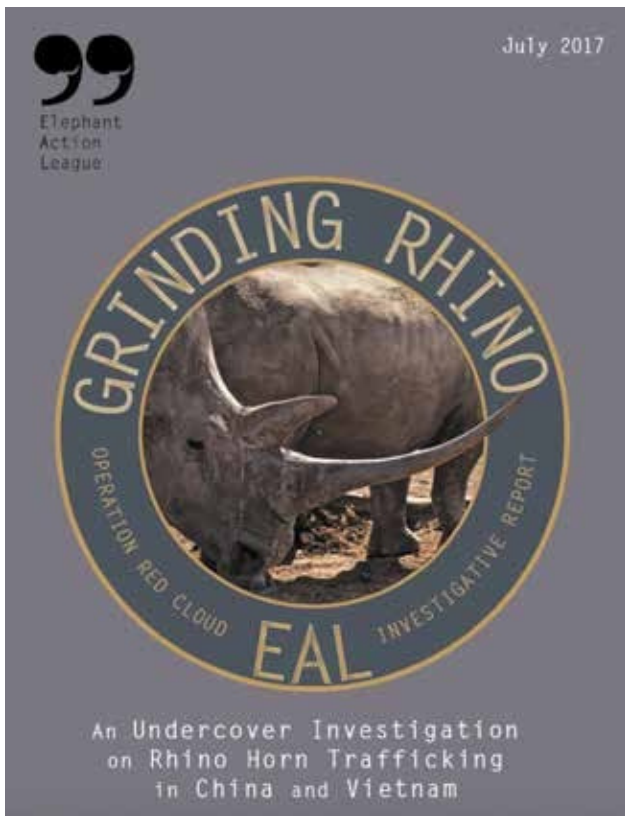
Blending Ivory

<https://earthleagueinternational.org/wp-content/uploads/2015/12/EAL-BLENDING-IVORY-Report-Dec2015.pdf>



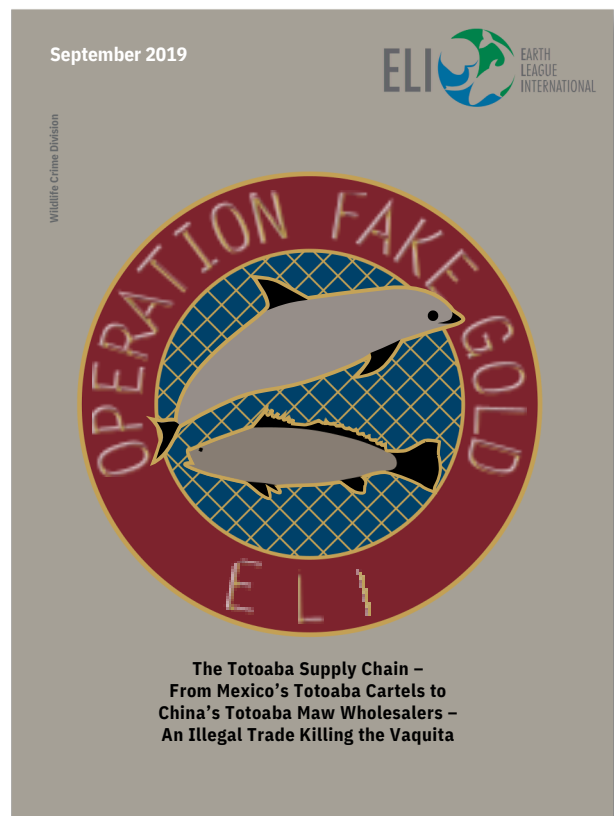
The white gold of Jihad

<https://earthleagueinternational.org/wp-content/uploads/2016/02/Report-Ivory-al-Shabaab-Oct2016.pdf>



Grinding Rhino

<https://earthleagueinternational.org/wp-content/uploads/2017/07/Grinding-Rhino-July2017-Elephant-Action-League.pdf>



Operation Fake Gold

<https://earthleagueinternational.org/wp-content/uploads/2018/07/EAL-Operation-Fake-Gold-Final.pdf>



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**ABOUT ELI**

Founded in 2013, ELI - Earth League International (formerly EAL - Elephant Action League) is a hybrid non-profit organization that merges the worlds of intelligence, security and conservation in service of wildlife and the people who protect it.

Earth League International protects our planet through field investigations, intelligence gathering, research, and knowledge sharing with key stakeholders positioned to take action.

ELI is a registered nonprofit, tax-exempt charity under section 501(c)(3) of the U.S. Internal Revenue Code.

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