Executive Summary

Operation Dragon

Revealing new evidence of the scale of corruption and trafficking in the turtle and tortoise trade

December, 2018
“Don’t worry, that’s my job, because tortoises and turtles cannot departure from any Indian airport, so I will buy Kolkata, crossing the India Bangladesh border, and then departure from the goods, from Bangladesh to Malaysia or Thailand, that’s my job, don’t worry, I can do, because I already doing, to Malaysia.”

Excerpt of a 2016 WhatsApp conversation between WJC undercover investigators and a reptile trafficker during Operation Dragon. Trafficker explains the steady smuggling routes to get the animals (often endangered species) from India to Malaysia on their way to their buyers and reassures his “customer” by “taking care of business.”
The illegal trade in freshwater turtles and tortoises, including species on the brink of survival, to supply the pet trade, is a multi-million-dollar industry. The scale of the trafficking gives cause for serious concern about the ability of some of the plundered populations to recover in the wild. The Wildlife Justice Commission (WJC) launched Operation Dragon in 2016 to shine a spotlight on the crimes, the criminals and the corruption that facilitates trafficking.

While there have been significant seizures of large quantities of live animals in Asia in recent years, those implicated have been exclusively low-level, easily replaced couriers, leaving those who organise and profit the most from the trade untouched. The WJC sought to change that.

Beginning in 2016 and lasting two years, Operation Dragon systematically gathered evidence on the inner workings of eight major trafficking networks, through undercover investigators on the ground and meticulous intelligence analysis. The investigation exposed the dark dealings of high-level wildlife criminals; revealed the consistent enabling of trafficking through organised corruption of officials at airports and transport hubs; documented in detail how the networks operate, fix prices and coordinate throughout the supply chain; and ultimately empowered law enforcement agencies to target and convict high-level traffickers and disrupt multiple wildlife crime networks.

The actionable intelligence and evidence gathered by the WJC investigators provided an in-depth understanding of individual roles and network dynamics, enabling law enforcement agencies to target the most prolific criminals in a time-critical manner.

As a result of Operation Dragon, eight wildlife trafficking networks were significantly disrupted, and 30 arrests made. Five traffickers have already been jailed, while other suspects are still awaiting trial at the time of writing. Another suspect has been subjected to an INTERPOL’s Red Notice after absconding following his arrest and is the subject of Malaysia’s first Red Notice for wildlife crime. More than 6,000 freshwater turtles and tortoises, including threatened species such as the black spotted turtle Geoclemys hamiltoni and the Indian star tortoise Geochelone elegans, were seized from traffickers.

During Operation Dragon, WJC investigators collaborated with several law enforcement agencies, including a joint operation between the Wildlife Crime Control Bureau (India), the Department of Wildlife and National Parks Peninsular Malaysia (PERHILITAN) and INTERPOL Environmental Crime Program resulting in the arrest of a key broker, operating across several countries.
The investigation exposed the consistent corruption of officials at strategic airports and transport hubs across South and Southeast Asia, ensuring the guaranteed access to safely smuggle wildlife without the risk of detection. Known as ‘settings’, the access is vital for the networks to operate. In many cases, the cost of doing business with the trafficker included the cost of corrupting a local official. Safe houses used for storage prior to transit were also identified and a major safe house in Dhaka, Bangladesh, was shut down as part of the WJC’s efforts.

During Operation Dragon, WJC investigators were offered more than 20,400 freshwater turtles and tortoises from 16 different CITES Appendix I and II listed species, including critically endangered animals. Investigators were able to collect comprehensive pricing information. Based on the traffickers’ own price lists, the wholesale value of the animals documented and offered is USD 3,198,403. Clearly the retail value would be considerably higher.

Investigators also detected an emergence in the trafficking of other CITES listed, but lesser-known in the freshwater turtle trade, threatened animals such as the red crowned roofed turtle Batagur kachuga and the three striped roofed turtle Batagur dhongoka, which fetch a high price on the international market. The higher price enables the traffickers to smuggle fewer animals, thereby reducing the risk of detection yet still yield a healthy profit.

Direct contact with traffickers allowed investigators to meaningfully quantify the scale of the illegal trade. WJC undercover investigators documented nearly three times as many black spotted turtles for illegal sale between 2016-2017 than were seized in the same period, helping to establish a more realistic assessment of the numbers of animals being smuggled and therefore a more accurate assessment of the resources required by law enforcement agencies to combat the trade.

Additional law enforcement operations are ongoing as a result of Operation Dragon. Some of the intelligence gathered during the two-year investigation that will assist in those actions has been reported to the relevant authorities but is not included in this report to ensure the investigations are not compromised. The findings will be made public when possible.

Over the course of the two-year operation, WJC investigators identified 200 potential ‘persons of interest’ (POIs) and focused on eight criminal networks operating across India-Pakistan-Bangladesh-Sri Lanka-Malaysia-Thailand.

While the focus of Operation Dragon was the freshwater turtle and tortoise trade, it became clear that there were parallels with the trafficking of other wildlife species. Similarly, it was apparent that the networks were more closely associated than first thought and several suppliers, graded at Level 4 on the WJC Subject Threat Assessment, were supplying many different factions across a wider network, operating in the same geographical ‘space’.

What they often had in common and what continues to be a key enabler of wildlife crime, is access to transport hubs through corrupt officials. These ‘settings’ ensure traffickers can move large quantities of wildlife with relative impunity. The WJC investigators documented 59 occasions when ‘settings’ were referenced across 14 different countries in Asia. Investigators established that smuggling routes changed depending on the reliability of the ‘settings’. In India, Kolkata became a preferred port over Chennai and some networks even moved their operations from India to Bangladesh following increased law enforcement activity.

The WJC was also able to glean information on the cost of corruption for the buyer (the ‘tax’ that the buyer has to pay in order to obtain the products) and how it fluctuates across different countries. For example, this ‘tax’ was reported to be 50% higher in Bangkok than in Kuala Lumpur.

The findings from Operation Dragon, outlined in more detail in the body of this report, provide an in-depth insight into the operations behind the trafficking of freshwater turtles and tortoises. It is hoped that the intelligence presented on the dynamics of the illegal trade, the composition of organised crime networks and modus operandi, will be of value to law enforcement officials and policy makers tackling wildlife crime.

\[1\] Based upon a calculation of median price per species of current prices from traffickers.

\[2\] Further reference can be found in section ‘The Value of Illegal Trade and Pricing Dynamics’ of this report.