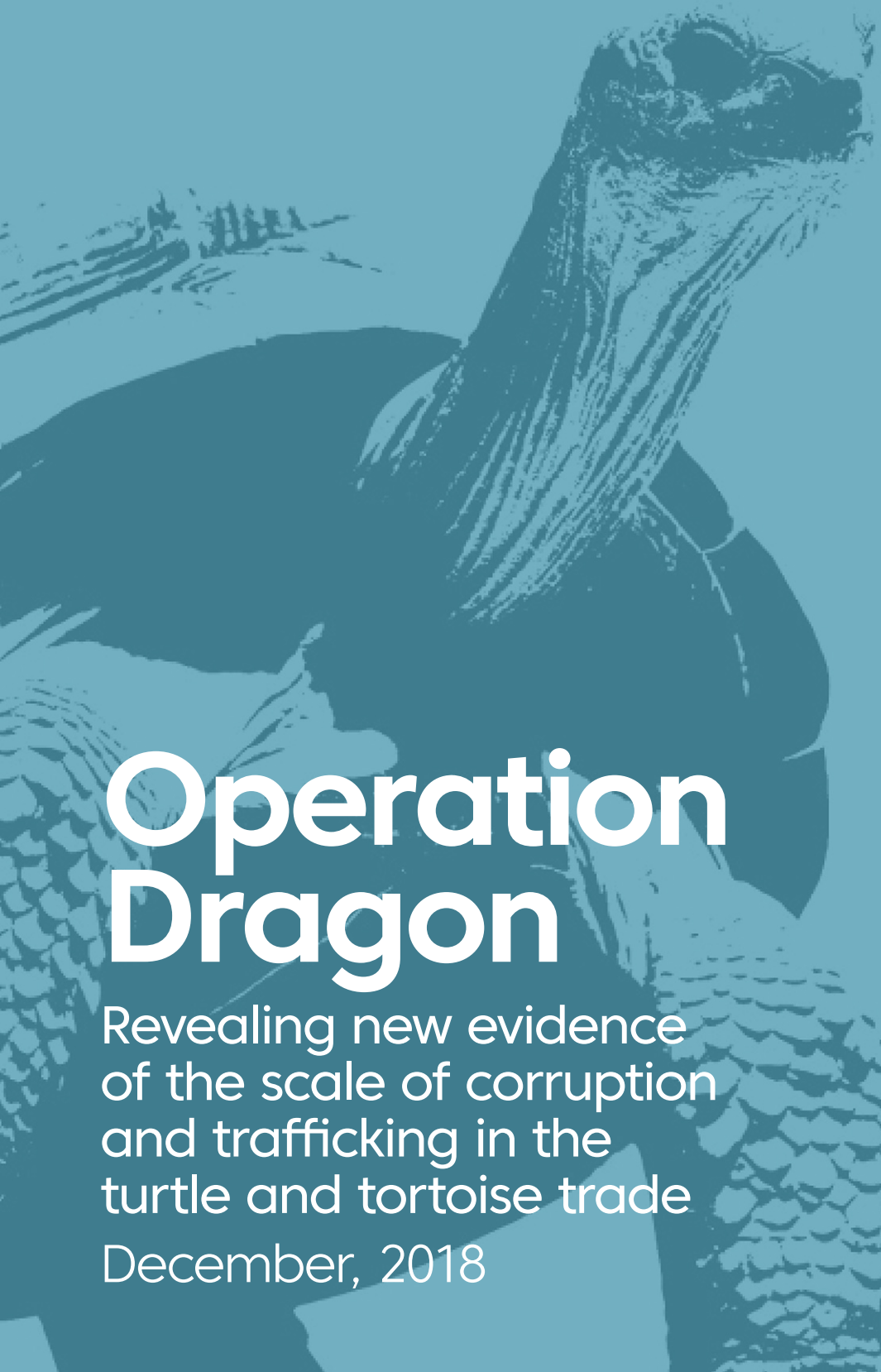
Wildlife Justice Commission



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 Wildlife Justice Commission (WJC) operates globally to disrupt and help dismantle organised transnational criminal networks trading in wildlife, timber and fish. We do this by collecting evidence and turning it into accountability.

Table of Contents

The Wildlife Justice Commission 2
Executive Summary 5
Background 5
Key Outcomes of Operation Dragon 5
Countering Corruption 7
01 The Illegal Freshwater Turtle and Tortoise Trade 8
02 The Investigation 10
Intelligence Development 14
Trade Routes 15
The Role of Corruption 18
Species For Sale 21
The Value of Illegal Trade and Pricing Dynamics 24
Criminal Dimensions of the Trade 26
Suppliers 27
Brokers 28
Sellers 28
Couriers 29
03 Case Studies 30
Case Study I 30
A Major Dealer 30
Case Study II 34
The Facilitator and the Convergence of Networks 34
Case Study III 35
The Bangladeshi Safe House 35
Case Study IV 36
Coordinated and Targeted Law Enforcement 36
04 Emerging Threats 38
05 Convergence of Wildlife Crime Networks 42
06 Conclusion 43
Acknowledgements 44

“India customs *settings*, Cambodia customs *settings*. Dhaka *settings*. These 3 things controlled by my brother only.”

Recorded converstaion with trafficker explaining the various ports where another associate has assured *settings* for him to move products. May 2016

Executive Summary

Background

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.

Key Outcomes of Operation Dragon

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 hamiltonii* 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.

'Settings'

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[1]. Clearly the retail value would be considerably higher[2].

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.

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.

Countering Corruption

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 eight networks were more closely associated than first thought and several suppliers, graded at Level 4 on the WJC Subject Threat Assessment[3], 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.

3 The WJC Threat Level is out of a maximum score of 5 and is based on an internal comparative analysis of the Persons of Interest criminal antecedents and the cultural impact on wildlife caused by their criminal activity.

01 The Illegal Freshwater Turtle and Tortoise Trade

An Illegal Trade that Continues Unabated

The illegal trade in freshwater turtles and tortoises to service the live pet trade is widespread and shows no sign of slowing down. Over the past ten years a diverse range of freshwater turtles and tortoises, including critically endangered species[4] have been offered for sale facilitated by transnational wildlife trafficking networks. Many of the more common species in illegal trade remain in high demand, and the continuation of crime at this level will inevitably impact on the ability of wild populations to recover.

Seizures of huge volumes of threatened species occur with disturbing regularity. In 2018, more than 17,000 radiated tortoises, *Astrochelys radiata*, were seized in two separate raids in their native Madagascar. Radiated tortoises, a critically endangered, CITES Appendix I listed species, are highly desirable on the international market. Similarly, trafficking of the Appendix I listed black spotted turtle has exploded in Asia over the past eight years[5].

4 According to the IUCN Red Listing of Endangered Species.

5 Chng, S.C.L (2014). Escalating Black Spotted Turtle *Geochlemys hamiltonii* trade in Asia: a study of seizures. TRAFFIC, Petaling Jaya Selangor, Malaysia.

Table 1 Top Ten Most Commonly Seized Species of Freshwater Turtles and Tortoises and Number of Seizures Per Year

Species	2014	2015	2016	2017	2018	Total
01 Black pond turtle *Geoclemys hamiltonii*	19	11	30	15	5	80
02 Indian star tortoise *Geochelone elegans*	9	20	5	9	12	55
03 Radiated tortoise *Astrochelys radiata*	4	6	2	2	6	20
04 Indian softshell turtle *Nilssonia gangetica*	2	8	2	2	2	16
05 Pig-nosed turtle *Carettochelys insculpta*	1	2	2	6		11
06 Ploughshare tortoise *Astrochelys yniphora*	1	1	2	3	2	9
07 Indian tent turtle *Pangshura tentoria*	1	2	1	1	3	8
08 Big-headed turtle *Platysternon megacephalum*	1	1	2	1	2	7
09 Red-eared slider *Trachemys scripta elegans*				3	3	6
10 Amboina box turtle *Cuora amboinensis*		1	1	3	1	6

Most Commonly Seized Species

An analysis of available data of seizures from January 2014 - September 2018 shows a total of 363 seizures were recorded globally, resulting in approximately 100,000 freshwater turtles[6] and tortoises reported as seized from the illegal trade. The number of seizures and animals seized remained relatively static between 2014-2017. However, available data for 2018 indicates the quantity of species seized so far is on the decline. Table 1 presents the number of seizures involving the top ten most commonly seized species.

Black spotted turtles, Indian star and radiated tortoises are the three most commonly seized species, often comprising high volumes.

Despite the success of law enforcement in seizing smuggled animals, it is rarely the trade coordinator that is held accountable. Historically it has been the low-level couriers who are apprehended, and prosecutions are uncommon[7], which provides little meaningful deterrent or impact on the proliferation of the trade itself.

Black spotted turtles offered by traffickers to WJC investigators during Operation Dragon. ©Wildlife Justice Commission.

Indian Star tortoises offered by traffickers to WJC investigators. ©Wildlife Justice Commission.

A radiated tortoise offered by traffickers to WJC investigators via social media during Operation Dragon. ©Wildlife Justice Commission.

6 Marine turtles were excluded.

7 Chng, S.C.L (2014). Escalating Black Spotted Turtle *Geoclemys hamiltonii* trade in Asia: a study of seizures. TRAFFIC, Petaling Jaya Selangor, Malaysia.

02 The Investigation

Wide Geographical Scope

The purpose of Operation Dragon was to focus on previously untouched networks and expose the corruption that facilitates the illegal trade in freshwater turtles and tortoises.

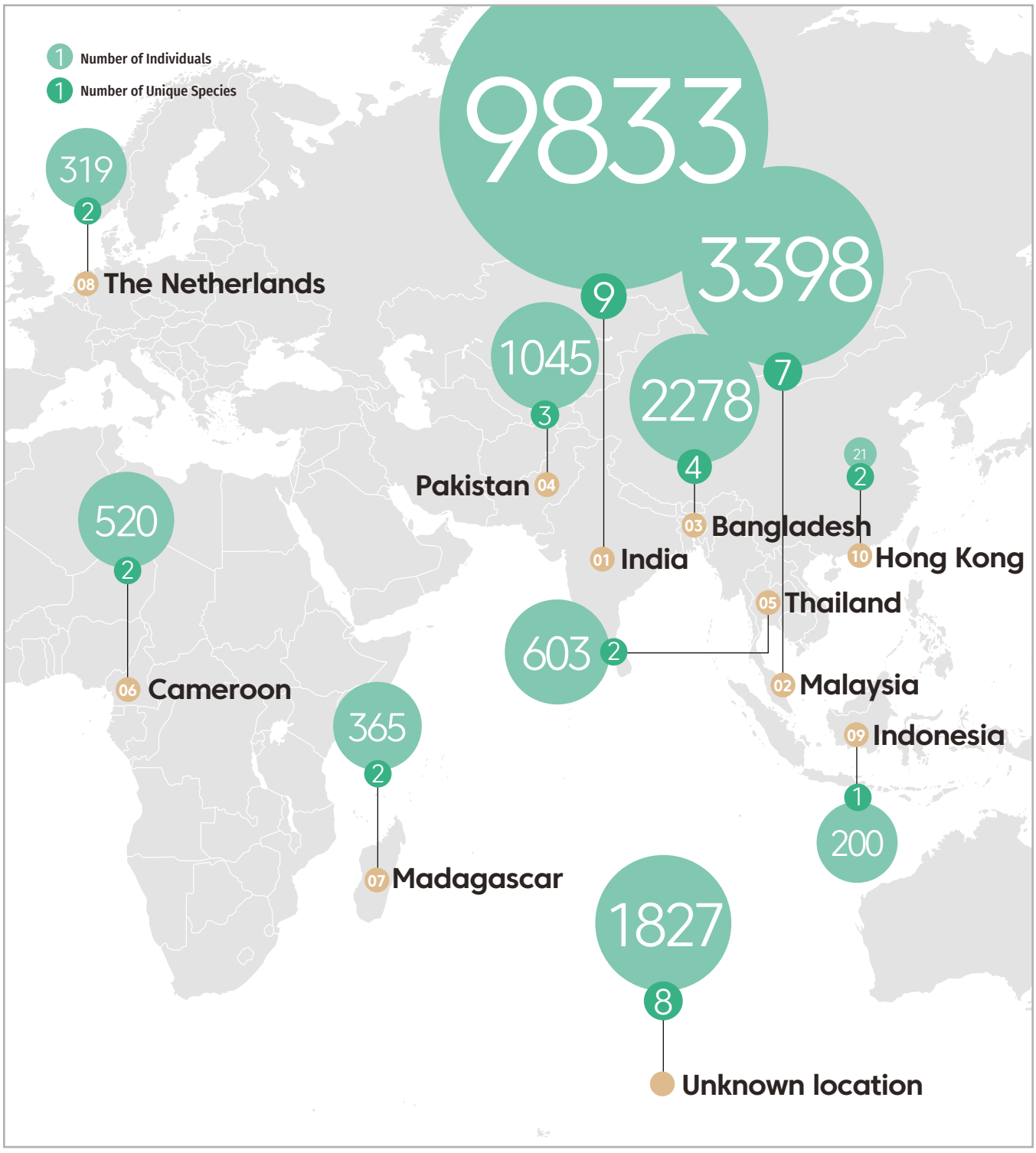
Starting in 2016, and using systematic intelligence gathering and analysis of data from social media and other sources, several networks run by Indian nationals based in Chennai and Kuala Lumpur emerged as key targets. The networks were primarily trafficking CITES Appendix I listed species such as black spotted turtles and radiated tortoises, as well supplying several other lesser-known species.

Once the networks were identified, the WJC investigators focused on the suppliers and those operating at the wholesale end of the trade chain, many of whom were already known to be using couriers to smuggle animals to traders operating at Chatuchak Market, Bangkok.

Intelligence gathered by WJC investigators through wildlife brokers confirmed the perception that mainland China and Hong Kong are significant markets for freshwater turtles and tortoises. Investigators did not encounter many language barriers, and there was only one instance in which a broker could not speak English and thus brought a translator to a meeting. It is suspected that Indian traffickers who speak English advertise and negotiate to either English-speaking Chinese buyers or English-speaking brokers who act on behalf of Chinese buyers.

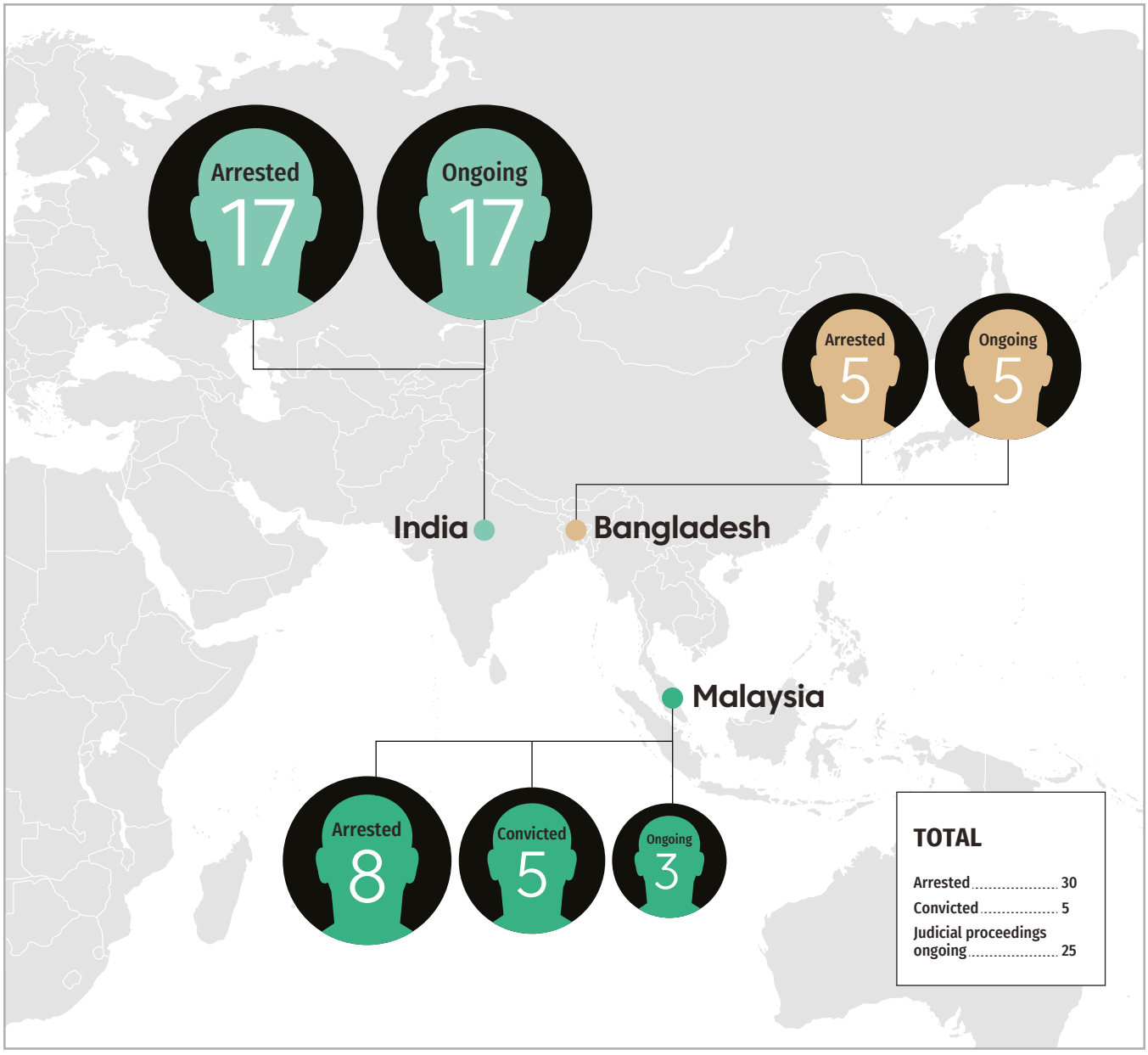
Whilst the focus was mainly on criminality occurring in Bangladesh, India, Malaysia, Pakistan and Thailand, the investigation reached much wider. In several instances it was not possible to confirm the country where the traffickers claimed to be based, however, Map 1 illustrates the countries where operatives were offered or directly sighted freshwater turtles and tortoises throughout the two-year case.

Map 1 Number of Individual Animals by Country Offered to or Sighted by the WJC investigators During Operation Dragon



As a result of the investigation, 30 Persons of Interest (POIs) from Bangladesh, India and Malaysia, were arrested, resulting in the conviction of five individuals (Map 2). Each of those five POIs were jailed in Malaysia for a minimum of 24 months. The remainder are still being processed through the courts and one is the subject of an INTERPOL Red Notice after he absconded following his arrest, Malaysia's first for wildlife crime.

Map 2 Pois 30 Arrests by Country and Outcomes



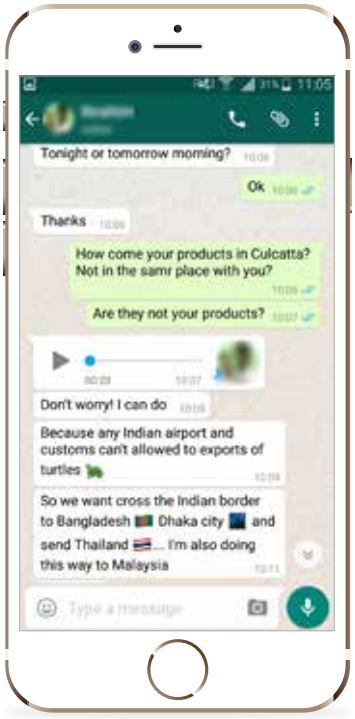
As a result of Operation Dragon, eight networks were disrupted, 30 arrests were made, and five traffickers have already been jailed, others awaiting trial.

Intelligence Development

Social media platforms such as *Facebook*, *Instagram* and web-based communications applications such as *WeChat, Messenger, Line* and *WhatsApp* have become virtual marketplaces for wildlife traffickers, enabling them to connect with customers irrespective of time and distance. The same platforms provided invaluable contact, and intelligence for WJC investigators.

Facebook and *WeChat* accounts of identified POIs were monitored to track illegal advertisements and sales of wildlife as well as mapping connections between members of the network.

Investigators also engaged traffickers operating at all levels in covert conversations on *WeChat, Messenger* and *WhatsApp* to consolidate evidence of their criminal behaviour. Conversations captured details of trafficking methods used and what turtles and tortoises they had for sale. Often the traffickers would provide photographs of their stock as proof of supply. It was noted that on social media platforms like *Facebook* there was a significant amount of open and aggressive trader traffic posted. While similar traffic was identified on *WeChat* and *WhatsApp*, incriminating material was not made public, but kept private until the veracity of the interested buyer had been determined.



WhatsApp conversation between a WJC investigator posing as buyer and a trafficker who specifies the route from India to Bangladesh.

The images collected during the course of contact with traffickers enabled the WJC team to:

- monitor what was on offer;
- observe fluctuations in availability and price;
- compare what each network was offering to pinpoint a single source of supply; and,
- verify the claims of the traffickers.

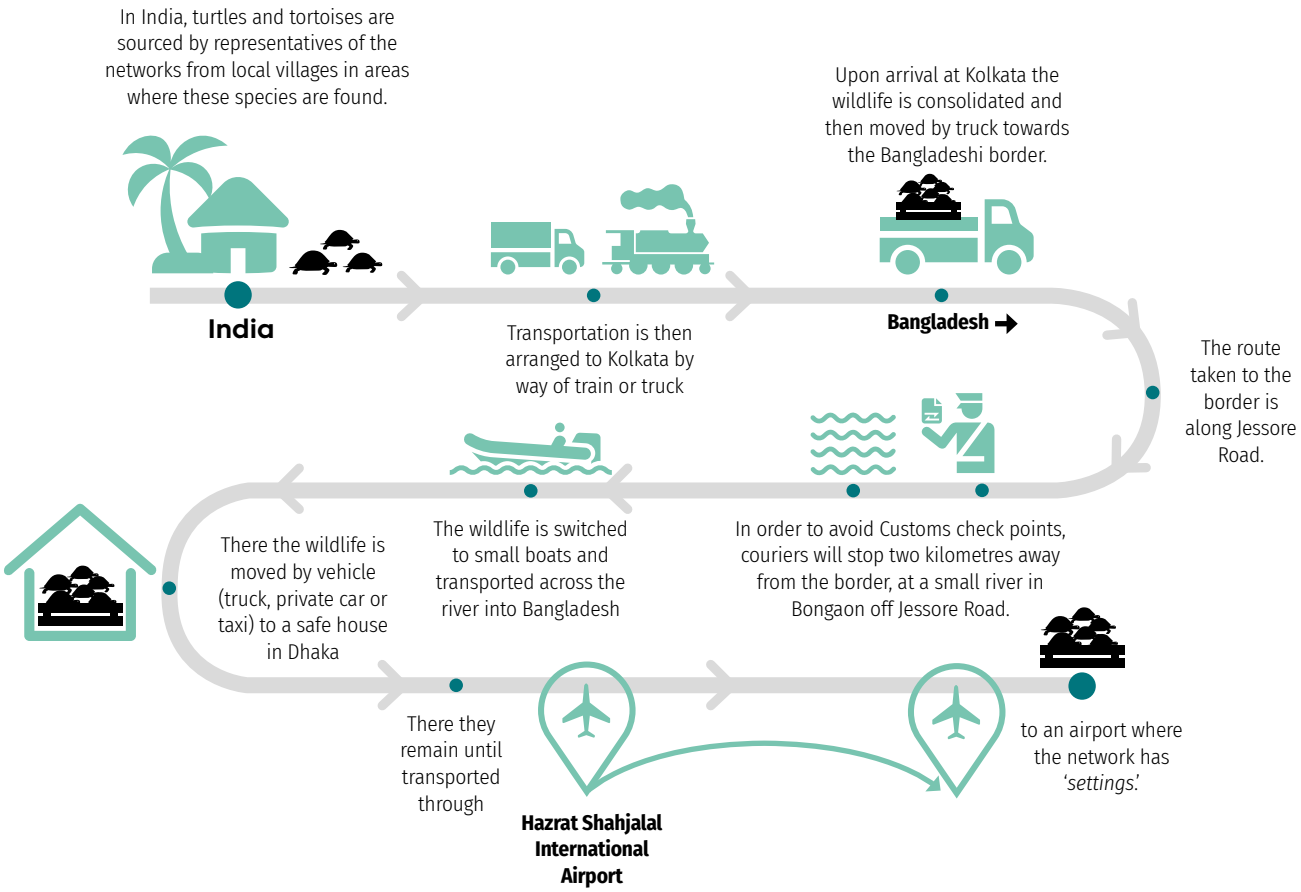
Creating a comprehensive database of what was being marketed by the trafficking networks enabled WJC analysts to quantify the scale and value of the trade in financial terms, a methodology that is seldom applied in wildlife crime investigations.

Trade Routes

In the majority of cases, stocks were being smuggled from India, Pakistan, Madagascar and to a lesser extent Sri Lanka with the majority of buyers based in mainland China and Hong Kong. The chosen route from seller to buyer depended on a variety of factors, with corruption at the core of all of them:

- The ability to bribe corrupt officials at land border checkpoints or airport customs i.e.; to create '*settings*';
- The price differential for corrupt payments between different countries;
- The work schedule of corrupt officials to be on call to facilitate an illegal transportation;
- Whether corrupt officials are seizing stock and forcing the groups to pay a '*tax*' for their release;
- A suitable mode of transport to ensure a low mortality rate;
- Whether the network wishes to avoid detection by authorities by re-directing the stock to multiple transit points.

Map 3 Smuggling Route from India into Bangladesh



Transport Hubs

Understanding the role of specific ports, in particular airports, is key to tackling this trade, given that approximately one third of seizures are associated with air travel (according to 2014-2018 data). Due to the nature of the trade involving live animals, transportation by sea is less common, instead other important transit locations involve land border points and train / bus stations.

Investigators carried out in-depth analysis to pinpoint where corruption was facilitating transnational wildlife crime, through the establishment of '*settings*'.

Table 2 provides a breakdown of airports that feature along the trade routes; whether the airport was where the trafficked animals originated, were transited through or was the final destination; and how frequently seizures occur at a particular airport. The methodology allows a direct comparison of where seizures have happened; where law enforcement action does not occur as frequently; and where trafficking occurs.

For example, Bangkok International Suvarnabhumi Airport and Kuala Lumpur International Airport (KLIA) both feature highly as destination airports for smuggling freshwater turtles and tortoises during the past four years. Despite both hubs being likely to be receiving trafficked animals through the airport, only three seizures took place at Kuala Lumpur, whereas 11 seizures happened in Bangkok. The figures indicate the probability of traffickers being intercepted at KLIA was much lower than in Bangkok.

Furthermore, intelligence gathered does not suggest that Malaysia is necessarily the intended destination for illegal wildlife. Investigators observed several occasions when factions of the wider network had organised meetings in Malaysia for buyers operating in another country.

Table 2 also indicates most seizures took place in Chennai[8]. It was interesting to note that many of the POIs identified during Operation Dragon had strong connections with the city, with many originating from Chennai. Despite that, the greater risk of detection because of the higher seizure rate (75%), had prompted many engaged traffickers to switch routes to smuggle the wildlife over the border from India into Bangladesh and then beyond. Hazrat Shahjalal International Airport in Dhaka has only reported two seizures in the last four years, suggesting it is a much safer option for traffickers (Table 2).

8 Leupen, B.T.C. (in prep.). Black Spotted Turtle *Geoclemys hamiltonii* trade in Asia II: A seizure analysis (2014 – 2016). TRAFFIC, Southeast Asia Regional Office, Petaling Jaya, Selangor, Malaysia.

Table 2 Airports most Commonly Featuring in Seizures (2014-2018)

Airport	Location Roles				Total (Role)	Seizure Rate (%)
	Seizure Location	Origin	Transit	Destination		
Bangkok, Thailand	11	0	1	7	19	58
Chennai, India	12	2	0	2	16	75
Kuala Lumpur, Malaysia	3	1	2	9	15	20
Antananarivo, Madagascar	9	1	0	0	10	90
Dhaka, Bangladesh	2	4	0	0	6	33
Jakarta, Indonesia	3	1	0	1	5	60
Mumbai, India	4	0	0	0	4	100
Hong Kong	4	0	0	0	4	100
Colombo, Sri Lanka	0	0	3	0	3	0

The Role of Corruption

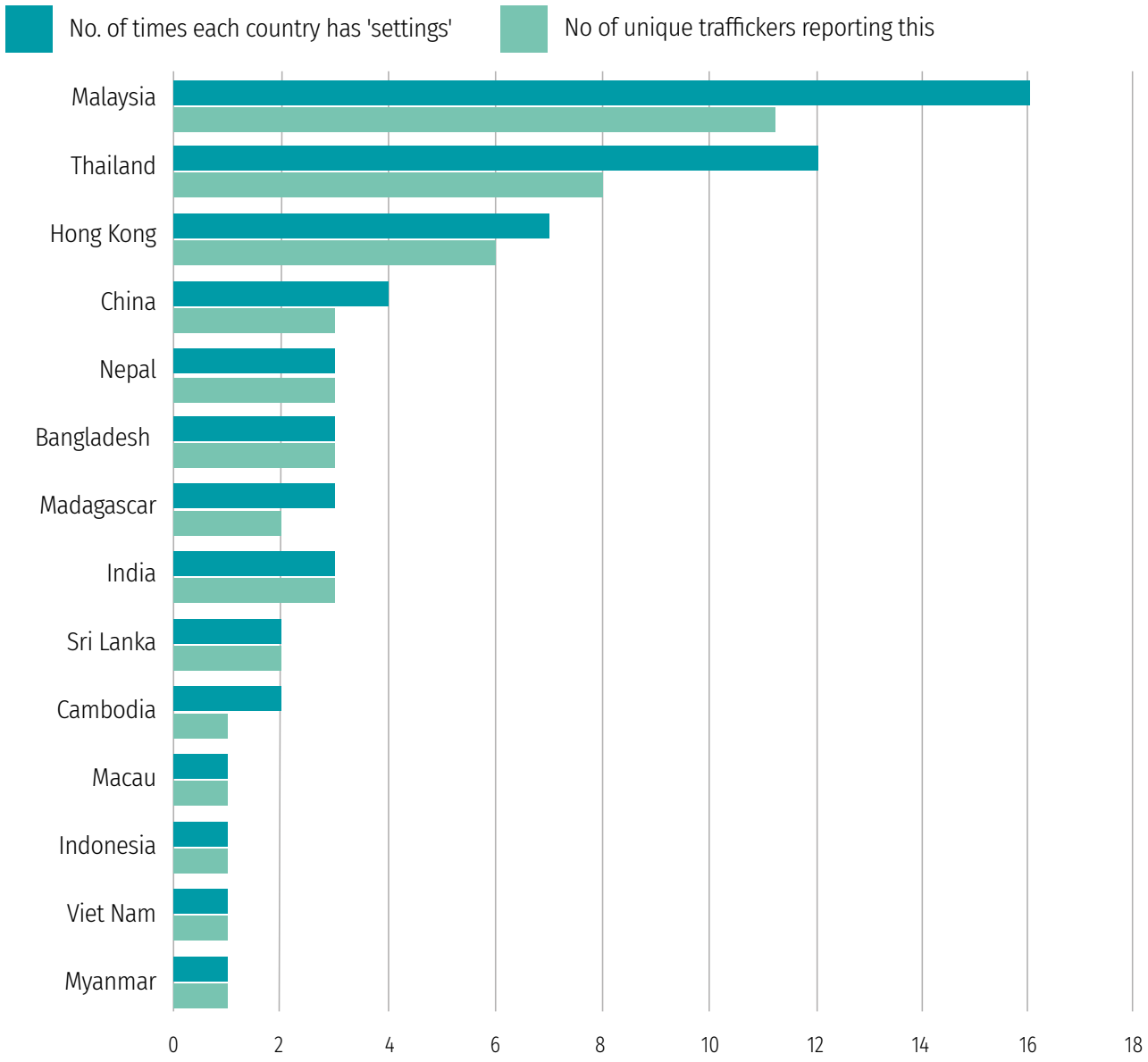
Corruption is present at all levels of wildlife trafficking and enables the continuation of illegal trade. Through their direct contact with traffickers, WJC undercover teams were able to identify where corrupt officials operate. Some were the very staff employed to protect wildlife at parks and reserves, but the majority were officials at transports hubs, creating '*settings*' and giving cover for traffickers.

Investigators recorded 59 references by traffickers of where they could facilitate the movement of wildlife. Sometimes these '*settings*' were capable of allowing up to 50 kg of wildlife per shipment whilst others were restricted by the number of available couriers.

The cost of corruption, sometimes referred to as a '*tax*' was passed on to the buyer. Investigators established it was costing traffickers approximately USD 1,800 to USD 2,300 per bag to be safely smuggled past customs at Suvarnabhumi Airport. However, at KLIA and KLIA2, traffickers only needed to pay approximately USD 900 per bag. This difference in rates may provide some insight into the disparity of seizures between BKK-Suvarnabhumi and KLIA.

Table 3 indicates where '*settings*' were reported geographically, and the number of times each country was reported by different traffickers. In Malaysia, for example, 11 different traffickers reported they had '*settings*' there on 16 separate occasions. While a primary focus of Operation Dragon was on Bangladesh, India and Malaysia, Table 3 highlights the range of countries also implicated as having corrupt officials at some of their ports.

Table 3 Instances of Corruption Recorded by WJC Investigators shown by Country and by Number of Traffickers Reporting this Issue.



"The radiated [tortoises] is suppose to arrive today, unfortunely the clearing officer's son died of accident last night in Madagascar, therefore the shipment will [arrive] next week, the rest of the Hamiltons [turtles] arriving Thursday evening. Once again, I really apologize and sorry for the inconvenience caused."

Recorded converstation with trafficker regarding the delay in products being shipped into Kuala Lumpur. August 2016.

During the two years of the investigation, every broker WJC investigators engaged with stated an ability to transport turtles and tortoises out of India and deliver them to either one or several transit countries using corrupt officials. The exception to this was that very few Indian-based traffickers had '*settings*' to smuggle animals into Chinese and Hong Kong airports. Investigators were told that a Bangkok-based Bangladeshi controlled this trafficking route.

Collating all the information, the intelligence team has mapped where corruption was reported (Map 4), creating a much clearer picture and deeper understanding of:

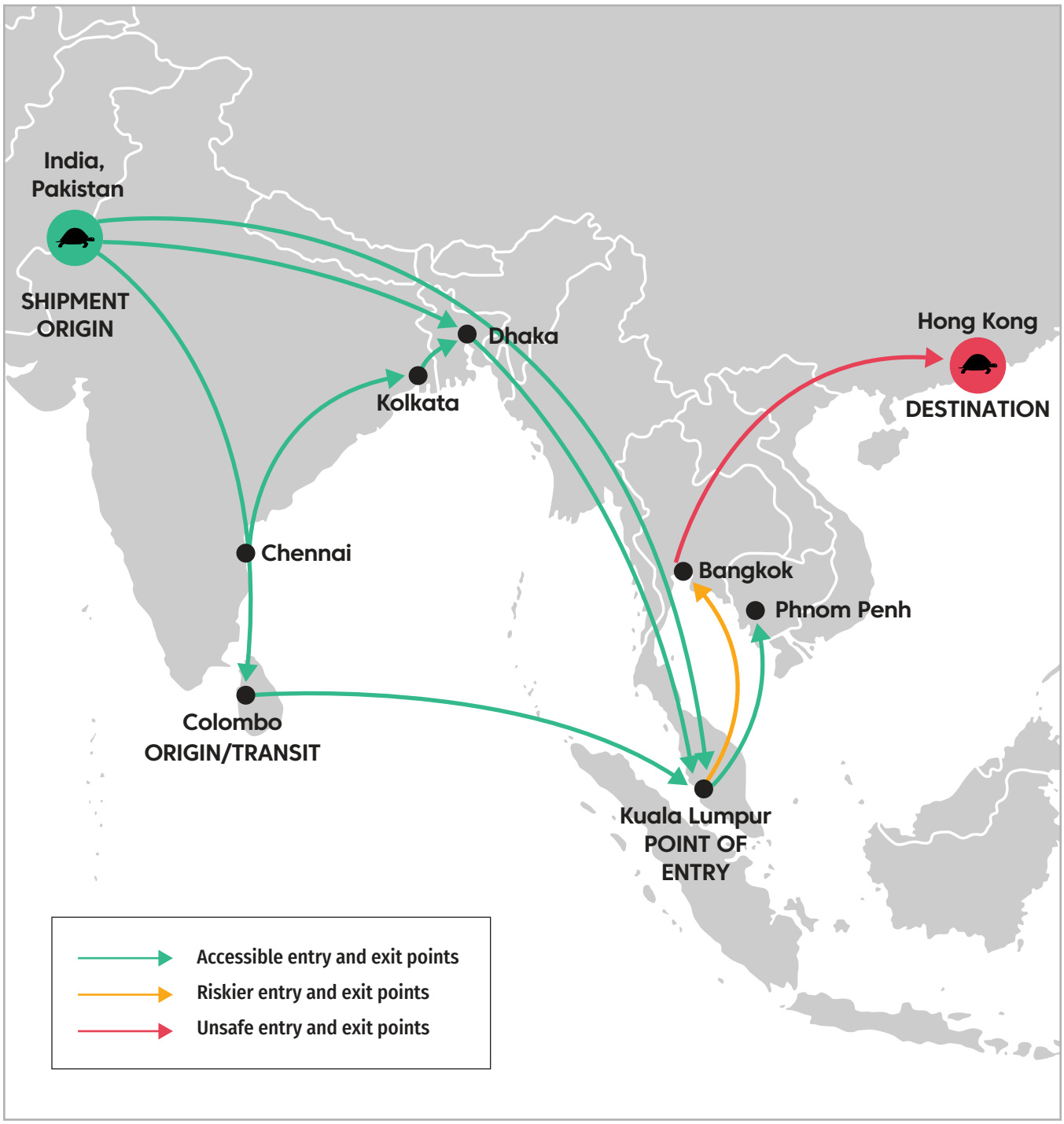
- where entry and exit points exist, such as Kuala Lumpur and Colombo;
- where products can be smuggled in but not out, such as Bangkok;
- locations where entry and exit are reported as problematic, such as Hong Kong.

The information also gave a valuable insight into the potential impact of removing the '*settings*' safety net. One trafficker told investigators that a shipment of radiated tortoises was due to arrive into Kuala Lumpur but was delayed because the corrupt official was not on duty as expected. Kuala Lumpur was repeatedly reported as the easiest port to traffic wildlife into and out of.

The pattern of altering routes to 'safer' ports was also documented in India. Several POIs moved their operations from India to Bangladesh following increased enforcement efforts in India. This was particularly noticeable in Chennai, which had previously been a commonly used port by traffickers but was now described as 'dangerous' by one trafficker. The intelligence is consistent with other reports indicating most of the networks exporting turtles and tortoises out of Chennai were instead moving first to Kolkata and then using corrupt officials at Kolkata airport to transport out of India, either directly to Malaysia or via Bangladesh. It is worthy of note that data analysis shows no seizures of freshwater turtles and tortoises were reported between 2014-2018 at Kolkata airport.

A switch in routing was also seen from Thailand to Malaysia, after it was alleged by some traffickers that species being seized by authorities in Thailand were then being sold back into trade. During one negotiation with a trafficker who features later in this report in Case Study I, he claimed that he had had products seized by officials and then offered back to him for a "fee".

Map 4 Ports Accessible / Inaccesible due to Corruption



Species Offered to the WJC

The WJC meticulously documented every sighting, image and report of different freshwater turtles and tortoises that were offered for sale. Almost every documented animal comes from a population at risk, and many are critically endangered.

The following table represents the most common species that were being illegally traded during the investigation, highlighting the number of species seized from illegal trade during our investigation as well as the number documented in trade between 2016-2017.

The images are taken directly from the traffickers the WJC undercover team covertly monitored and contacted during the investigation.

Table 4 Most Common Species Sighted by WJC Investigators during Operation Dragon.

Name: Indian star tortoise *Geochelone elegans*
CITES: Appendix II
Range: India, Pakistan, Sri Lanka (Sri Lankan star tortoises)
IUCN Red List Status: Vulnerable
Population: Decreasing
Individuals Offered / Sighted by the WJC: 9,222
Individuals Seized from Illegal Trade: 8,636

Name: Black spotted turtle *Geoclemys hamiltonii*
CITES: Appendix I
Range: India, Pakistan, Bangladesh
IUCN Red List Status: Vulnerable
Population: Data deficit
Individuals Offered / Sighted by the WJC: 7,342
Individuals Seized from Illegal Trade: 2,648

Name: Radiated tortoise *Astrochelys radiata*
CITES: Appendix I
Range: Madagascar
IUCN Red List Status: Critically Endangered
Population: Decreasing
Individuals Offered / Sighted by the WJC: 1,546
Individuals Seized from Illegal Trade: 699

Name: Red crowned roofed turtle *Batagur kachuga*
CITES: Appendix I
Range: India & Bangladesh
IUCN Red List Status: Critically Endangered
Population: Data deficit
Individuals Offered / Sighted by the WJC: 378
Individuals Seized from Illegal Trade: 28

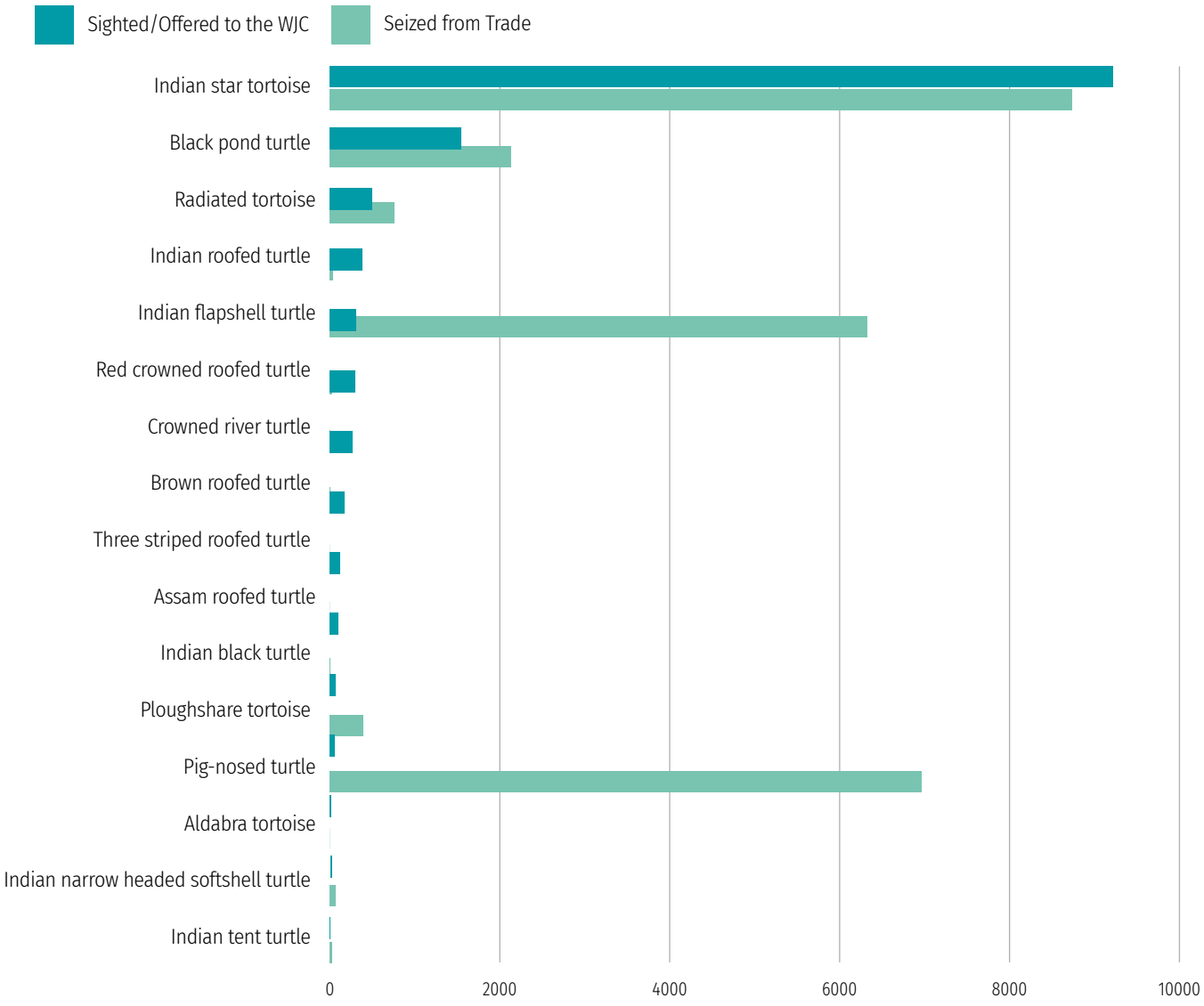
Name: Three striped roofed turtle *Batagur dhongoka*
CITES: Appendix I
Range: India & Bangladesh
IUCN Red List Status: Endangered
Population: Data deficit
Individuals Offered / Sighted by the WJC: 265
Individuals Seized from Illegal Trade: 1

Name: Ploughshare tortoise *Astrochelys yniphora*
CITES: Appendix I
Range: Madagascar
IUCN Red List Status: Critically Endangered
Population: Decreasing
Individuals Offered / Sighted by the WJC: 67
Individuals Seized from Illegal Trade: 402

All pictures @Wildlife Justice Commission

An analysis of the available seizure data (between January 2014- September 2018) shows several consistencies between the species seized from trade compared to the range of species offered and / or sighted by the WJC investigators during the investigation. However, there are several important and clear inconsistencies, as shown by Table 5. The Operation Dragon figures attempt to provide a more complete picture of the individual numbers and scale of the illegal trade and deliver more data for law enforcement agencies, conservation organisations and policy makers, to ensure an adequate level of resources is allocated to tackling the problem.

Table 5 The Number of Individuals, by Species Illegally Seized from Trade and Observed by the WJC (2016-2018)



Almost every specimen documented by the WJC during Operation Dragon comes from a population at risk, and many are critically endangered.

The Value of Illegal Trade and Pricing Dynamics

Given the high-value many species can fetch in illegal trade, it is concerning that research by the United Nations Office on Drugs and Crime (UNODC) and the Asia / Pacific Group on Money Laundering published in 2017 found that while 86% of jurisdictions interviewed reported that they are affected by wildlife crime 71% do not regard wildlife crime to be a significant money laundering threat[9]. Due to the high profits generated by wildlife crime for the trafficking networks, it is likely that some proportion of these will be laundered.

During the course of Operation Dragon all the available pricing data was collated and analysed, in order to estimate a monetary value to the illegal trade that had been observed.

It is estimated that the value of the freshwater turtles and tortoises documented in trade is more than USD three million. Although this is based upon wholesale values and not retail which is likely to be much greater. A breakdown of the estimated value per species and in total can be found in Table 6.

9 https://www.unodc.org/documents/southeastasiaandpacific/Publications/2017/FINAL_-_UNODC_APG_Wildlife_Crime_report.pdf

Table 6 Total Quantity and Value[10] of Observed Trade during Operation Dragon (USD)

Species	Sighted / Offered to the WJC	Higher Quantity Offered	Median Price Per Head	Total Value*	Median Price Per Kilo
Indian star tortoise (Geochelone elegans)	9222	Yes	54	**497.988**	**282,5**
Black spotted turtle (Geoclemys hamiltonii)	7342	Yes	110	**807.620**	**220**
Radiated tortoise (Astrochelys radiata)	1546	Yes	410	**633.860**	**n/a**
Indian roofed turtle (Pangshura tecta)	497	No	120	**59.640**	**n/a**
Red crowned roofed turtle (Batagur kachuga)	378	No	1575	**595.350**	**n/a**
Brown roofed turtle (Pangshura smithii)	300	No	45	**13.500**	**n/a**
Three striped roofed turtle (Batagur dhongoka)	265	No	1150	**304.750**	**n/a**
Assam roofed turtles (Pangshura sylhetensis)	172	No	75	**12.900**	**n/a**
Indian flapshell turtles (Lissemys punctate)	125	No	65	**8.125**	**n/a**
Ploughshare tortoise (Astrochelys yniphora)	67	No	5170	**346.390**	**n/a**
Aldabra tortoise (Aldabrachelys gigantea)	15	No	1764	**26.460**	
			Total	**3.306.583**	**Total**

10 Where we could attribute a value.

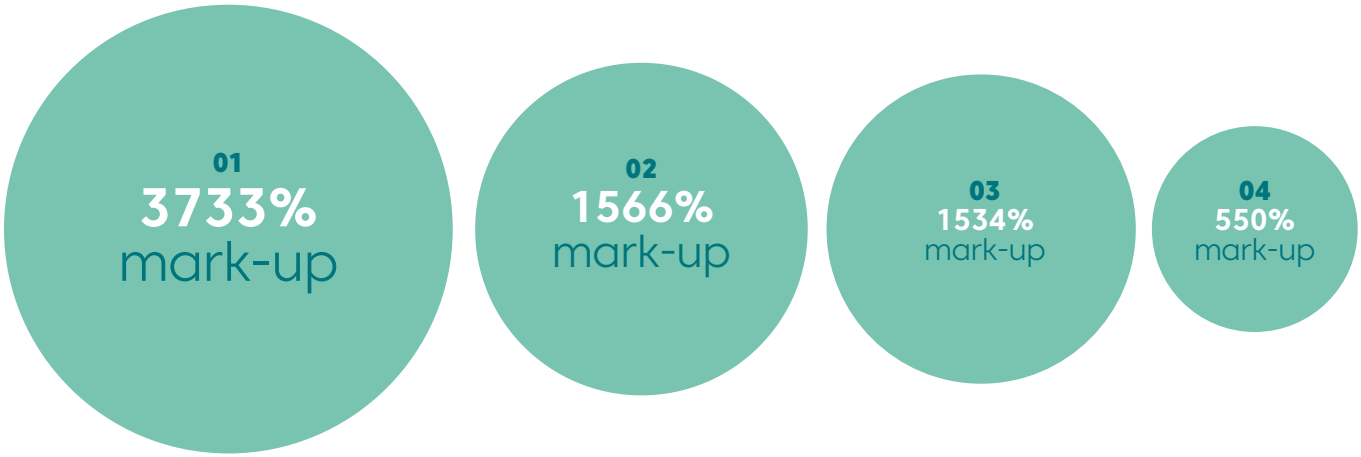
Pricing of specific species and shipments is variable. Factors affecting prices include the species, their size, and whether they are being purchased at the wholesale or retail level.

As detailed below, prices were quoted either by kilo for larger animals or per piece for smaller specimens:
• Black spotted turtle (Price per kilo: USD 282.5 and price per head: USD 110;
• Indian star tortoise (Price per kilo: USD 220 and price per head: USD 54).

While size is one consideration, quality also counts. One high-level trafficker with operations in Madagascar and direct connections into Hong Kong stated: *"Real money is made through top quality piece, one-piece costs HKD 25,000-30,000, even up to HKD 120,000".*

Although the final price paid on the international market may be extremely high, collectors and brokers operating in India receive a very small proportion of the profits. To illustrate, current market price breakdown in Table 7 highlights the mark-up from source to market.

Table 7 Mark-up in Value of Prices



01 Three striped roofed turtles
India: 2000 rupees per piece (USD 30).
Malaysia: USD 1150

02 Indian star tortoises
India: INR 200 per piece (USD 3).
Malaysia: USD 50 per piece (small)

03 Red crowned roofed turtles
India: INR 7000 per piece (USD 104 - small).
Malaysia: USD 1700 (small-medium) per piece

04 Black spotted turtles
India: INR 1500 per piece (USD 22).
Malaysia: USD 140-150 per piece (medium to large size)

Prices and inevitably mark-ups can vary for more substantial deals, sometimes individuals will earn commission based upon number of individual pieces sold, or alternatively it can be a flat fee, the decision appears to depend on the type of animals being sold.

Overall investigators determined that prices were cheapest in India, and rates were comparable for delivery to Bangladesh, Cambodia, Malaysia, and Thailand. Delivery to China and Hong Kong demanded the highest fee. Additionally, investigators established that a typical transaction would involve paying 50% upfront and the remainder upon receipt of the products. The use of financiers, who would fund deals but maintain their anonymity by operating through a broker, was also known to be occurring.

Criminal Dimensions of the Trade

Through this investigation the WJC was able to glean many insights into how this trade operates, what forces are at work and what may influence this. This illuminated certain dynamics across the wider network but also presented several intelligence gaps that we tasked our investigations team to assess. This enabled the WJC to gain further valuable and actionable insights as the investigation progressed.

In contrast to other forms of illegal trade, the value of this trade lies in the ensuring the commodity survives and maintains its aesthetic appeal. Sellers attempting to boost the price of a specimen will describe unique features of the products such as how “bulky” the shells were: referring to a high and thick shell, or the greater visibility of bright colouring in the patterns, with both aspects considered desirable. Traffickers hire carers with the sole job of looking after the captive animals prior to sale. The right food, access to light and suitable storage are all issues that the traffickers must take into account, as buyers will inspect the animals closely before closing a deal.

The role of carer is not the only one that was observed and documented by the WJC investigators. Suppliers, brokers, buyers and couriers are clear and distinct functions within the wider network enabling illegal trade. However, the volume and source of species on offer can change unexpectedly and, as such, the traffickers may play different roles on a weekly or monthly basis depending on changes in supply or transportation routes.

The investigation also found there were strong connections between traffickers engaged in this trade type, despite not being part of the same faction, with many associations and linkages identified across the wider criminal network.

Traffickers' geographical location is also redundant when it comes to their ability to conduct transactions. Many networks have business partners and associates in two or more countries and have proven abilities to transport stock to transit and destination countries of the buyers' choice.

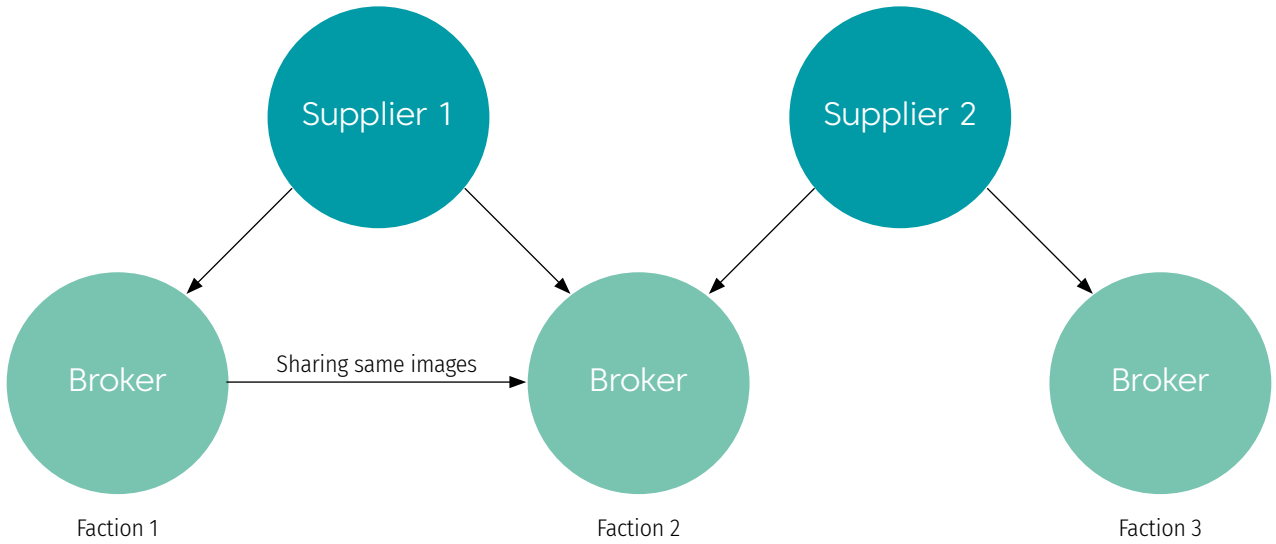
While the networks require flexibility to respond to changing circumstances the presence of key roles was consistent across the wider network:

Suppliers:

Threat Level: High / Exposure: Low

Operation Dragon identified Indian and Pakistani nationals as traffickers who have access to a large supply of turtles and tortoises, claiming they own farms. There was no evidence available to confirm or refute if they are involved in legal captive breeding of species or instead have the capacity to store large volumes of animals sourced from the wild. Many of the suppliers investigated during Operation Dragon deliver to brokers in India as well as brokers of South Asian heritage based in Malaysia. In contrast to other lower-level roles such as brokers and couriers, suppliers do not appear to be well connected across the network and are often not as active on social media. It appears that they operate in a much less-exposed manner, transferring risk by supplying to key brokers and thereby removing themselves from business deals. (Chart 1).

Chart 1 Upper Level of Supply Chain for Freshwater Turtles and Tortoises

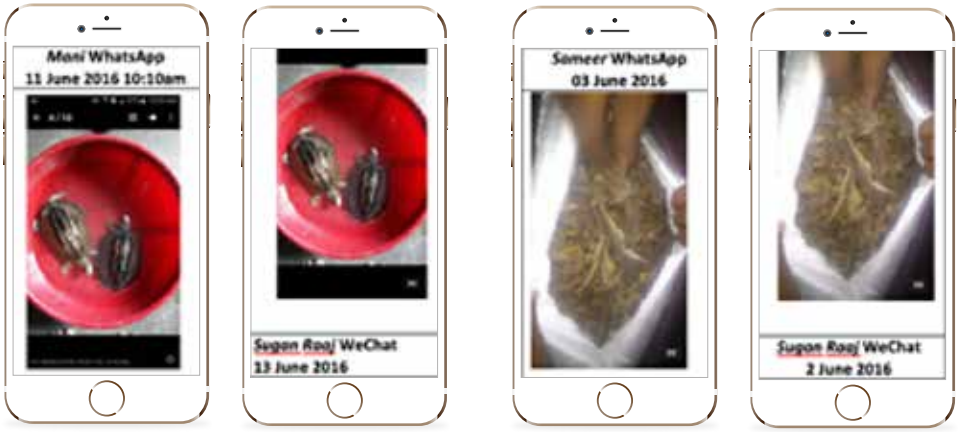


Brokers:

Threat Level: Medium / Exposure: Medium

The WJC investigators identified several factions operating in the same geographical areas and selling the same species, but initially had no further information to assess if they were criminally associated. After the intelligence team analysed the images provided to the WJC undercover investigators by several brokers, it confirmed suspicions that pictures of the same animals were being shared by different brokers operating across multiple networks (Charts 2 & 3). The image research and analysis helped pinpoint several traffickers using the same source / supply of animals. Chart 3 illustrates the key connecting role these individuals play across the networks.

Chart 2 Sharing of different images



The WJC used images of the same products for sale, offered by different traffickers. This often indicates that the traffickers are associated to each other as they are sharing the same images (which may suggest criminal associations across those smaller factions) or more importantly, that they are sharing the same supplier.

Sellers:

Threat Level: Low / Exposure: High

Soft marketing on social media was found to be the most commonly used method by which sellers trade. *Facebook* is often used to connect to common interest groups or to message potential buyers, and sellers will often include images of animals in their user profile or amongst their photo albums. While some users on *Facebook* may publicly advertise the availability of stock, investigators found that the majority of sellers limit evidence of illegal trading activity on their open profile.

Instead, business negotiations were more likely to take place on the *WeChat, WhatsApp, Messenger* or *Line* applications. In applications such as *WeChat*, after users have accepted each other as trusted contacts, a seller can advertise their stock using the 'Moments' function and communications and exchange of images and videos can take place more securely.

Many sellers involved in criminality also have business interests in legitimate animal trading companies, such as online pet stores or local markets and are suspected of using these companies to launder illegally obtained wildlife. One such example is the Chatuchak market in Bangkok, Thailand which is a consumer hub for live pets but has also been identified by investigators as a community of closely associated sellers who are connected to illicit markets for endangered and exotic wildlife.

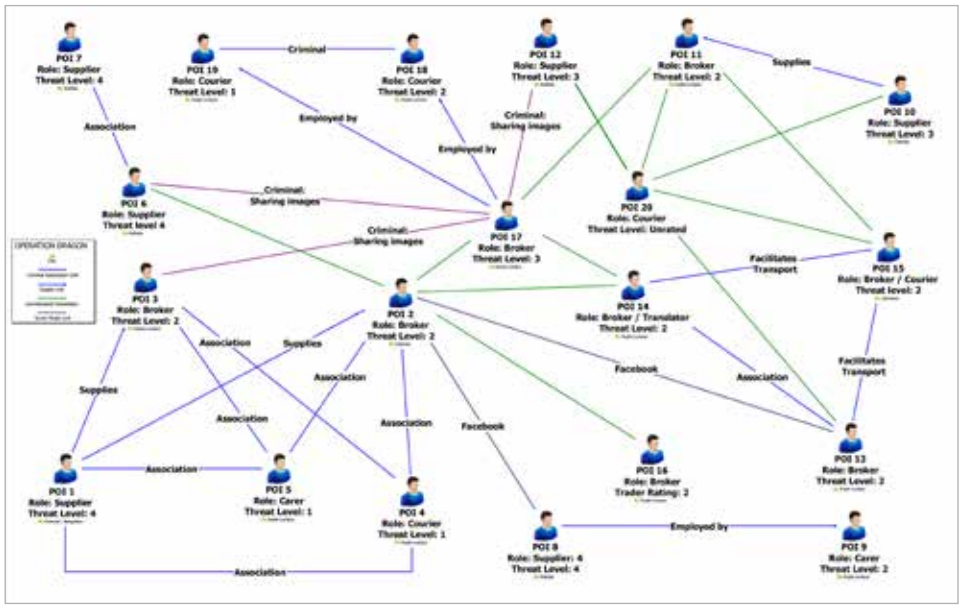
Couriers:

Threat Level: Low / Exposure: High

Couriers are the most vulnerable actors across the network, operating on the frontline and running the greatest risk of detection. The job requires no special skills or expertise, so couriers are also considered the most 'expendable' of all the network members.

Chart 3 provides a snapshot of some of the key POIs and demonstrates the strong interconnectivity across the wider network (criminally and otherwise) despite them being aligned to eight smaller factions. It further demonstrates how well-connected brokers are.

Chart 3 Interconnectivity of POIs



03 Case Studies

As well as outlining key roles within the illegal wildlife trade networks, this report provides four specific case studies which highlight different dynamics of the trade and the consequences for key players as a result of Operation Dragon.

Case Study I

A Major Dealer

WJC investigations target high-level traffickers as a priority, in order to cause maximum disruption to the networks they control.

In March 2016. 'POI 1' became the main target of Operation Dragon and was assessed as a Level 4 trafficker. Originating from Chennai, India, but having previously lived in Malaysia and frequently travelling between Dhaka and Bangkok, he was heavily involved in the trafficking and supply of freshwater turtles and tortoises across South Asia - specifically Bangladesh, India and Sri Lanka and - and Southeast Asia, primarily Malaysia and Thailand. It was also clear that he governed a significant wildlife trafficking network. He worked hard to conceal his real identity, using several aliases and disguises and unlike many other traffickers, moreover, no social media presence could be attributed to him.

'POI 1' claimed to be able to supply considerable quantities of turtles and tortoises including both CITES Appendix I and II listed species such as radiated tortoises, Sulcata tortoises *Centrochelys sulcate*, black spotted turtles and Indian star tortoises, as well as Indian star tortoises from Sri Lanka.

The WJC investigation showed that 'POI 1' was responsible for arranging transport and accommodation for a network of couriers; had holding or storage facilities in a number of countries, as well as '*settings*' and access to corrupt officials in several strategic ports. During conversations with the WJC investigators, he offered to supply stock, which he could safely send from India to Kuala Lumpur using a "friend from the airport" and arrange overland smuggling from Kuala Lumpur to Bangkok.

'POI 1' revealed details of the different ports where he is guaranteed safe passage, presumably through corrupt law enforcement or customs officials, and also described how his trusted contact in Malaysia (who investigators suspect is in the Customs division) ensures the stock are brought safely into the country as cargo and then transferred to a courier's carry-on luggage into KLIA. He appeared to have no '*settings*' in Hong Kong and would avoid sending shipments there. Instead, he was known to work with an individual in Dhaka, who did have '*settings*' at the airport.

The team documented several instances when 'POI 1' moved large shipments of CITES-listed species across different parts of Asia using strategically placed *'settings'* and contacts. The timing largely depended on when the corrupt officials were on duty.

'POI 1' also referred to concerns with transit flights from India. Direct flights into Thailand and Malaysia are considered safer than via Singapore, for example and 'POI 1' was explicit about the airlines he would and would not use. It is unknown whether these preferences are due to corrupt airline staff, or whether those airlines are chosen due to their poor security procedures. The risk that comes with trafficking through certain locations inevitably has a knock-on effect on price. Delivery to Malaysia was the cheapest and preferred option offered by 'POI 1', who also indicated that it was much cheaper and easier to bribe customs officials in Malaysia than in Thailand. This is somewhat supported by analysis of available seizure data which shows Thailand is more proactive than Malaysia in seizing smuggled freshwater turtles and tortoises.

The Role of Corrupt Officials

The investigation also uncovered the way in which the network operation changed partly due to the reliance upon corrupt officials. During one meeting at which the WJC investigators were offered 500 kg of black spotted turtles for USD 150,000, 'POI 1' revealed the base of operations had changed from Bangkok, to Kuala Lumpur, because the corrupt Thai customs officials they had previously worked with were now seizing their shipments and selling them off themselves. Later 'POI 1' told the WJC team that the black spotted turtles they had offered were seized at a checkpoint by the Thai military whilst en-route from Kuala Lumpur to Bangkok. The veracity of this claim cannot be determined as the seizure has not been publicly reported by the Thai authorities.

While 'POI 1' was instrumental in coordinating the network activities, the investigation revealed the range of additional roles that facilitate wildlife crime and the live turtle and tortoise trade.

The WJC undercover team were taken to a safe house in Malaysia where over 1,000 Indian star tortoises were being kept. The team met different members of the network:

1. The money man, who accompanies every shipment and receives the payment;
2. The Malaysian facilitator, who finds customers and arranges supply and transportation of the turtles/tortoises;
3. The carer, who accompanies the shipment and feeds, cleans and cares for the turtles/tortoises;
4. A relative of 'POI 1' who oversees the sale.

The safe house belonged to a Malaysian family who rented it to the network, which was one of many the network used to minimise exposure and the risk of having their stock stolen by other wildlife traffickers. The possibility of being robbed by

rivals appeared to be of more concern than law enforcement action, as they had an ongoing relationship with corrupt officials which reduced that threat.

Cooperation with Indian and Malaysian Authorities

As a result of the WJC undercover investigation and the amount of analysed intelligence that was gathered on the network, the planned shipment and the location of the storage facility, two raids were carried out by PERHILITAN at the safe house and at a hotel in Kuala Lumpur in July 2016 (Table 10), leading to the arrest of four Indian nationals. Two of the men were arrested at the safe house, where 23 Indian roofed turtles and 1,011 Indian star tortoises, with a value of approximately USD 75,000 were recovered. WJC investigators remained in contact with the Malaysian facilitator long enough for PERHILITAN agents to reach the hotel where both the facilitator and a courier were also arrested on the same day, in possession of four suitcases containing 36 black spotted turtles, valued by the traffickers at approximately USD 10,000.

While the four arrests and three subsequent prison sentences were considered a great success, the original 'POI 1' was still at large and operational. The WJC team continued to investigate and gather intelligence on his activities; his influence within the network and how it operated and colluded with others.

Using social network analysis (SNA), we were able to develop assessments of many of the key suppliers in the network, many of whom we knew, based on factors such as our image analysis, were supplying to the other brokers in the network. The application of SNA allowed us to identify who had a 'high visibility' across the network and therefore played a key connecting role and were found to be more 'exposed' and whose activity was easier to track, thereby making them more vulnerable.

Conversely, 'POI 1' was found to display a high eigenvector - indicating a much greater level of influence while maintaining a low profile within his network. The application of SNA has proven value in criminology as it allowed the WJC analysts to quantify criminals associations identified during Operation Dragon. The rationale allows the WJC to meaningfully measure how the removal of one of two POIs can significantly disrupt operations and prevent the reorganisation of wildlife criminal networks.

Throughout the course of the investigation, the WJC continued to cooperate with the WCCB and in October 2017 'POI 1' was arrested. He is wanted by several law enforcement agencies including INTERPOL and the Directorate of Revenue Intelligence in India[11].

11 https://bangaloremirror.indiatimes.com/bangalore/cover-story/along-came-the-big-fish-how-wildlife-smuggler-machli-landed-in-dri-net/articleshow/61074185.cms

Table 8 Outcome of the Arrests in July 2016

Name: **Nagoor Kani KAMAL BASHA**
Role: **Malaysian Facilitator**
Subject Rating: **Level 3**
Nationality: **Indian**
Status: **Subsequently sentenced to 24 months in prison in September 2016.**

Name: **Nizamudeen SHAMSHUDEEN**
Role: **Courier**
Subject Rating: **Level 1**
Nationality: **Indian**
Status: **Subsequently sentenced to 24 months in prison in September 2016**

Name: [redacted]
Role: **Money Man**
Subject Rating: **Level 3**
Nationality: **Indian**
Status: **Subsequently charged, however, he failed to appear in court and is currently WANTED. In October 2017, Malaysia requested INTERPOL to issue a Red Notice for his arrest.**

Name: **Ayub Khan NAZEER**
Role: **Carer**
Subject Rating: **Level 1**
Nationality: **Indian**
Status: **Subsequently pled guilty in December 2016 and received 24 months in prison.**

Identity of the Money Man is concealed as to not jeopardise ongoing law enforcement investigations.

Case Study II

The Facilitator and the Convergence of Networks

By simultaneously deploying WJC undercover investigators to different parts of the wider trafficking networks, Operation Dragon clearly demonstrated the interconnectivity of the illegal trade.

Discussions between one investigation team and a trafficker led to an introduction to 'Sugan' – a man who claimed to be able to facilitate the movement of wildlife in and out of Malaysia through a corrupt official based at KLIA. The official was 'Sugan's' uncle.

A second investigation team had already had several meetings with 'Sugan' over a small quantity of three-striped roofed turtles, which the investigators had witnessed in his possession. They were also told of the uncle's willingness to illegally ship wildlife through KLIA.

'Sugan' later arranged for WJC investigators to meet a Chinese Level 3 trafficker, who also used the same corrupt airport official to facilitate his illegal trade out of Malaysia. He claimed to be able to supply ivory, pangolins and tigers, as well as turtles and tortoises.

WJC operatives maintained their contact and negotiated with the Chinese Level 3 trafficker, who eventually introduced them to two more members of the wider network - Zheng Shaohua, a Chinese Level 4 trafficker and a second Chinese man, who investigators rated as a Level 5.

During discussions with the Level 5 trafficker, he told WJC investigators that he had been involved in wildlife trafficking between Asia and Africa for over 20 years. He also claimed to have been extensively involved in money laundering. He also indicated that he had access to senior corrupt customs officials in Malaysia, further claiming that he had 600 kg of ivory that he was selling on behalf of corrupt customs officials in Malaysia.

After weeks of negotiations with the Level 5 trafficker, WJC undercover investigators were finally able to sight and document 411 kg of ivory for sale. As a result, PERHILITAN investigators arrested two Malaysian men of Chinese heritage– Lim Len Bengand and Lim Yan Chun, as well as the Level 4 trafficker Zheng Shaohua. All three were later convicted and fined for being in possession of the ivory.

PERHILITAN investigators were not able to verify the claims made by the Level 5 trafficker that the ivory was sourced from corrupt customs officials and, as he was not present at the time the ivory was seized, he was not charged with any offences. Similarly, 'Sugan,' and the Level 3 Chinese trafficker have not been charged.

Case Study III

The Bangladeshi Safe House

The undercover operations by the WJC investigators have consistently evidenced that the major dealers who profit from wildlife trafficking do not do so in isolation. As well as the wider networks of traffickers and corrupt officials, they require an infrastructure to facilitate their illegal activity, including storage facilities, or 'safe houses'. Identifying the safe house and therefore disrupting their ability to store products is an important tactic in disrupting operations and will have a knock-on effect across the wider network.

Operation Dragon identified a number of strategic sites across Asia, eventually pinpointing a major storage facility in Dhaka, Bangladesh.

Although 'safe houses' are often referred to as 'farms' by traffickers, there was no evidence that the POIs were using the facilities as breeding centres. There were however, clearly collection, storage and distribution points where live animals were held until buyers were found. The captive species are kept alive and healthy by carers, in order to maximise the value and subsequent purchase price and some safe houses have carers on hand 24/7.

In 2017, WJC investigators identified a considerable movement of reptiles from Dhaka into Southeast Asia. At least three different exporters, based in Dhaka, were receiving smuggled turtles and tortoises from India and then exporting them into Bangladesh, predominantly via the Bengal border. Low law enforcement efforts in Dhaka, evidenced by the fact that only two wildlife seizures have taken place since 2014, made it a good safe house location and smuggling point for the traffickers.

Video evidence, obtained in July 2017, shows a significant number of reptiles were being held in an unidentified 'safe house' in Dhaka that was controlled by 'POI 2' - one of the Dhaka-based exporters. By August, further research by the investigations team had identified the location and the information was passed to the INTERPOL Environmental Crime Programme who then provided it to the National Central Bureau (NCB) in Bangladesh.

The NCB were able to respond, with ongoing support from the WJC investigators and in September, after providing actionable intelligence of a pending export, the NCB arrested five suspects, including 'POI 2'. The facility was confirmed as a 'safe house' and 620 different reptiles from various species, including an infant gharial crocodile *Gavialis gangeticusto* - a critically endangered species - were discovered.

The targeting and exposure of this safe house, and the collaborative work between the NCB, INTERPOL and the WJC investigators will impact upon the network's ability to continue to operate on such a scale.

Case Study IV

Coordinated and Targeted Law Enforcement

Operation Dragon resulted in the arrest of 30 wildlife traffickers - one of whom was Bakhrudin Ali Ahamed Habeb. Investigators assessed the Indian national who was smuggling turtles and tortoises from India to Malaysia as a Level 3 trafficker.

In addition to the illegal trade in freshwater turtles, 'Ali' claimed to be able to sell other species, including Sri Lankan sea cucumbers, which again highlights the diversity of some wildlife traffickers repertoire.

WJC operatives began tracking his criminal activity, as well as attempting to make direct contact. The intelligence gathered also pointed to 'Ali' using a lesser known smuggling route into Malaysia through Tiruchirappalli International Airport in Tamil Nadu, India - known locally as Trichy Airport. According to seizure data analysis (2014-2018) only one seizure of illegal wildlife has been reported at Trichy Airport, in 2015.

In February 2017, the findings were shared with the WCCB, as part of a joint effort to stop illegal shipments of wildlife from India to Southeast Asia. Specific intelligence was provided in April 2017 of 'Ali's' intention to broker a shipment of turtles from India to a destination suspected to be Malaysia.

The following month WCCB officers tracked Ali boarding a flight from Trichy Airport to Malaysia. No hold luggage was checked in and no other passengers were suspected to be operating as his couriers. WJC undercover operatives travelled to Malaysia and, working collaboratively with investigators from PERHILITAN, continued to track 'Ali's' movements.

Three days later 'Ali' was arrested at a hotel in Kuala Lumpur in possession of two suitcases containing 55 freshwater turtles, including black spotted and red crowned roofed turtles, which are critically endangered and CITES Appendix II listed. Bakhrudin Ali Ahamed Habeb was convicted under Section 68 of the Wildlife Conservation Act 2010 in Malaysia and sentenced to two years in prison. WJC investigators are continuing to build on the intelligence gathered during Operation Dragon and assess the impact of 'Ali's imprisonment and removal from the criminal network.

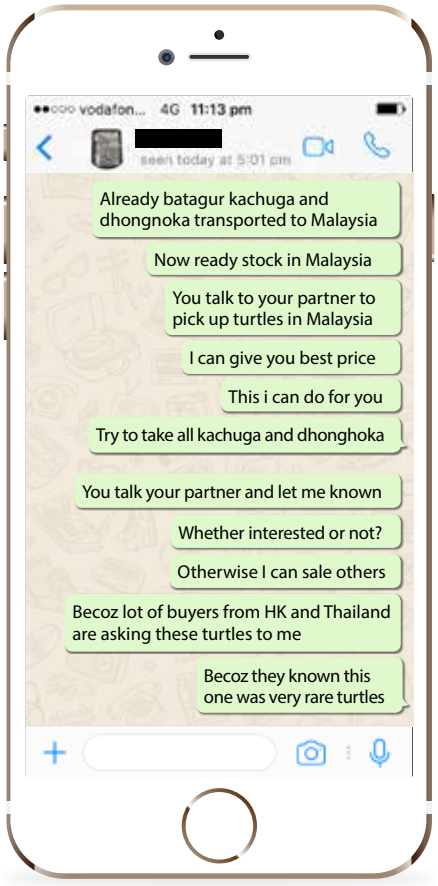
The evidence and the analysis of intelligence by the WJC provided an in-depth understanding of network dynamics, enabling law enforcement agencies to target high-level traffickers.

04 Emerging Threats

Rarer and Higher-Value Freshwater Turtles

In addition to the insightful intelligence gathered during Operation Dragon on wildlife criminal networks and key traffickers, investigators noted an increase in the trafficking of higher-value turtles.

Four species of South Asian roofed turtles - the Assam roofed turtle *Pangshura sylhetensis*; brown roofed turtle *Pangshura smithii*; red crowned roofed turtle *Batagur Kachuga;* and three-striped roofed turtle *Batagur dhongoka*, all CITES Appendix II listed species, emerged in trade during Operation Dragon. A transcript of a conversation between Level 3 trafficker 'Ali' and a WJC investigator makes it clear that the rarity of the species influences price:



Conversation with a trafficker via social media, in which he offers kachuga and dhonghoka turtles

Images 1 & 2 show some of the rarer South Asian species 'Ali' was offering in October 2016 and the theory is further supported by intelligence indicating wildlife traffickers in India were offering rarer South Asian freshwater turtles rather than more popular species such as the Indian star tortoise. While the number of animals offered during the investigation was relatively low in comparison to other species (Table 9), they were relatively frequently offered and there is concern, given their population status, that any removal from the wild will have a significant impact on their ability to recover.

One red crowned roofed turtle can be bought for INR 10,000 [USD 150] before being be sold on for the international market for a quoted USD 1,700. Our investigators established that most of the red crowned roofed and three striped roofed turtles on offer had originated from Uttar Pradesh and are transported to Bangladesh via towns in West Bengal, before being smuggled overseas.

1 Red crowned roofed turtle *Batagur kachuga* offered through Facebook private message function, October 2016

2 Three striped roofed turtle *Batagur dhongoka* offered through Facebook private message function, October 2016

Table 9 Rarer Species Offered to the WJC during Operation Dragon

Spe cies	Distribution	IUCN Status	CITES Appendix	Wildlife Protection Act, India	Number of individuals offered to the WJC
Assam Roofed Turtle *Pangshura sylhetensis*	Bangladesh, India	Endangered (Bangladesh), Critically Endangered (India)	Appendix II	Sch.I	125
Black Spotted Turtle *Geoclemys hamiltonii*	Bangladesh, India, Nepal, Pakistan	Endangered (Bangladesh), Vulnerable (India)	Appendix I	Sch.I	7,342
Brown Roofed Turtle *Pangshura smithii*	Bangladesh, India, Pakistan	Near Threatened	Appendix II	Not Listed	300
Red crowned Roofed Turtle *Batagur kachuga*	Bangladesh, central Nepal, north-east India	Critically Endangered	Appendix II	Sch.I	378
Three striped Roofed turtle *Batagur dhongoka*	Bangladesh, north-east India	Critically Endangered (Bangladesh) and Endangered (India)	Appendix II	Not Listed	265

The WJC intelligence team has also been given information that members of the forest department and wildlife officials in northern India are involved in the turtle smuggling trade. Investigators noted that while they documented these four species of freshwater turtles being offered for sale covertly, the same species have seldom been reported as being seized from trade across Asia between 2014-2018 (Table 10). This is particularly noticeable when compared with the volume of black spotted turtles seized in trade.

According to the CITES Trade Database, none of these four species has featured in legal trade between 2014 and 2017, with fewer than 15 individuals recorded for 2013 and the occurrence of these species on the international market is rarely reported. This disparity between what is being documented during Operation Dragon compared with the number seized in illegal trade may mean that current efforts by law enforcement agencies are not sufficient to detect such species in illegal consignments.

Table 10 No. of Individuals by Species Sighted/Offered to the WJC vs the No. Seized from Trade

Species	Total No. of individuals sighted / offered to the WJC (2016-17)	2015	2016	2017	2018	Total No. of individuals seized from trade
Assam roofed turtle	172	0	0	0	43	43
Brown roofed turtle	300	0	0	0	3	3
Black spotted turtle	7,342	5411	2583	65	50	8109
Red crowned roofed turtle	378	0	1	27	0	28
Three-striped roofed turtle	265	0	0	1	0	1

The WJC investigators considered other factors that may be contributing to this emerging trend:

- These species appear to command a higher price than other, more common species. Consequently, smaller consignments can be transported and still yield a healthy profit – this also lowers the risk of detection;

- These species are CITES Appendix II listed and illegality is not always clear as limited legal trade is permitted for Appendix II listings;

- Enforcement crack downs on the high-volume species found in the trade, such as black spotted turtles as described in Case Study III may force traffickers to opt for lower-volume, higher profit species;

- They are lesser known in the trade and therefore may not be easily identifiable by port officers as being trafficked;

- They occur in the same areas being used as a trade route for traffickers, therefore may be more easily accessed.

Investigators also noted that the three-striped roofed turtle and the brown roofed turtle, despite being threatened species and CITES Appendix II listed, are not covered under India's Wildlife Protection Act, 1972 (Table 9) As a matter of urgency, wildlife agencies should consider including them in the law in order to prevent further exploitation of legal loopholes.

05 Convergence of Wildlife Crime Networks

The focus of Operation Dragon was on the illegal trade of freshwater turtles and tortoises. During the two-year investigation it became clear that there is collaboration between the reptile traffickers and other criminal wildlife networks that WJC undercover teams were monitoring for trafficking primates. The crossover was particularly apparent in relation to the use of transporters and corrupt officials, where multiple networks were using the same '*settings*' as well as evidence of couriers smuggling animals for two apparently unrelated networks. It suggested that one or more high-level POI was orchestrating the crimes.

The WJC investigators identified a syndicate led by a Level 5 POI involved in the large-scale supply of ivory, rhino horn and pangolin scales sourced from Africa. The POI was found to also have several significant legitimate commercial interests. At least one of the Operation Dragon traffickers reached out to the Level 5 POI after being arrested, suggesting the Level 5 also operates in the role of a boss. Despite having a different ethnicity and language, another POI within the Level 5 network acted as the key connector between these disparate groups.

Confirmation of the level of collaboration and shared resources between different wildlife trafficking networks emphasises the need to investigate and assess transnational wildlife trafficking from a broader criminal perspective and not simply on a species-specific basis.

06 Conclusion

Over the two-year course of Operation Dragon, a significant amount of new intelligence was gathered on the illegal freshwater turtle and tortoise trade. The observations, information, data and documentation also provided valuable insights into the workings of the wider illegal wildlife trade, by documenting the interconnectivity of networks and high-level traffickers.

The collaboration with law enforcement agencies has resulted in the disruption of significant networks and the arrest of prolific traffickers. The comprehensive data collection by WJC investigators has also identified emerging issues that law and policy makers should urgently address.

It is well known that corruption is at the heart of wildlife trafficking. However, through Operation Dragon, the scale and coordination of that corruption is tangibly illustrated. It has also provided the data and evidence to most effectively disrupt the illegal networks that feed it.

In 2018, two landmark cases may indicate a slow change in the tide. In Hanoi, Viet Nam, in August, a former customs officer was sentenced to 16 years in prison for embezzlement after he and an accomplice were caught stealing seized ivory and rhino horn from a customs warehouse[12]. In October, a Malaysian court sentenced two ex-customs officers to a total of five years in jail and MYR 230,000 (USD 55,082) in fines each, on several charges of illegal possession of 31 black spotted turtles[13].

The findings presented here illuminate important elements of the illegal trade in freshwater turtles and tortoises from a criminal perspective. We describe in detail the value of responding to this crisis by conducting intelligence-led investigations and addressing all angles of the supply chain. The resources we invested in such an approach allowed us to meaningfully support and empower law enforcement agencies, particularly where transnational crime is concerned, a common characteristic of wildlife crime. The WJC hopes that law enforcement agencies mandated to tackle wildlife crime, conservation organisations and those in positions of influence can respond according to the current situation as presented here.

Finally, whilst corrupt officials facilitated this trade, we focussed our activities on developing the intelligence picture to inform investigative efforts by dedicated wildlife and police officials in India and Malaysia. It was the activities of these officers that resulted in the arrest of 30 individuals and the disruption of these eight networks, making crime more difficult for those who benefit most at the expense of vulnerable and threatened species. It is these officers who are the unsung heroes, working to do what is right in an area where many find the allure of money all too tempting.

12 https://www.traffic.org/news/former-hanoi-customs-officer-gets-16-years/

13 https://www.traffic.org/news/malaysia-hands-down-hefty-sentence-to-ex-customs-officers-caught-illegal-wildlife/

Acknowledgements

The Wildlife Justice Commission worked closely with the Department of Wildlife and National Parks Peninsular Malaysia (PERHILITAN) and India's Wildlife Crime Control Bureau (WCCB) during Operation Dragon. We are encouraged by the trust and confidence placed in us by both organisations. We are also grateful for the support and cooperation from INTERPOL during the case.

The WJC is a not-for-profit entity, founded in 2015 and based in The Hague, the Netherlands.

We have been able to complete this investigation with the generous support of the Dutch Postcode Lottery, the Adessium Foundation, the Oak Foundation, the Brook Foundation and the Nando and Elsa Peretti Foundation.

Our Partners

Credits

Author: Sarah Stoner
Coordination: Isabel Leal
Editor: Sara Nimmo
Art Direction & Design: Sue Cowell | Atomo Design

Published by The Wildlife Justice Commission
The Hague, The Netherlands

December 2018

www.wildlifejustice.org

“Kindly note we are the owner of this stock. So please don’t waste your time with the local brokers.”

Upon developing a relationship with one of the traffickers, he makes clear that he is the owner of the products. July 2017.

www.wildlifejustice.org