Rhino horn trafficking as a form of transnational organised crime 2012-2021

2022 GLOBAL THREAT ASSESSMENT
The Wildlife Justice Commission acknowledges the immense challenges facing law enforcement agencies that are investigating the transnational organised criminal networks trafficking in rhino horn. These challenges include legislative deficiencies, insufficient resources, mandate, technical capacity, intelligence sharing issues, and of course, the scourge of corruption. We also pay our respects to those officers and rangers who have paid the ultimate price and those who continue to risk their lives on the frontline preventing the poaching of rhinos and investigating these criminal networks.

The Wildlife Justice Commission is committed to continuing to support law enforcement agencies as they work to end the trafficking of rhino horn.

It is with this mission that we produce this threat assessment. It aims to share strategic intelligence that identifies and provides insights on present and emerging organised crime threats relating to rhino horn trafficking. It interprets and analyses intelligence holdings and information from open sources to build the global intelligence picture, propose hypotheses about the immediate or imminent threats, identify where intelligence gaps exist, and highlight vulnerabilities that could become potential threats in the future.

We hope that this assessment will go some way towards assisting law enforcement agencies working across the illegal rhino horn supply chain to maximise their response and impact in addressing this issue, and to continue to build on the important progress and achievements that are being made.

The full report is set out in 10 chapters covering key criminal elements of the illegal rhino horn trade.

Recognising the density of detail in the report, each chapter is written to be able to be read as a stand-alone topic with the aim of making the report more accessible and useful for policy makers, practitioners and researchers interested in a specific aspect of criminality. The stand alone publication focuses on the impact of COVID-19.
Acknowledgements

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## Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>AIS</td>
<td>Automatic Identification System</td>
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<tr>
<td>ANAC</td>
<td>National Administration of Conservation Areas</td>
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<td>ASB</td>
<td>Anti-Smuggling Bureau</td>
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<tr>
<td>CITES</td>
<td>Convention on International Trade in Endangered Species of Wild Fauna and Flora</td>
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<td>DFFE</td>
<td>Department of Forestry, Fisheries, and the Environment</td>
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<td>DRC</td>
<td>Democratic Republic of Congo</td>
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<td>EEFC</td>
<td>Environmental Enforcement Fusion Centre</td>
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<td>FRELIMO</td>
<td>Liberation Front of Mozambique</td>
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<tr>
<td>HAWKS</td>
<td>Directorate for Priority Crime Investigation</td>
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<td>KLIA</td>
<td>Kuala Lumpur International Airport</td>
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<td>OBK</td>
<td>Operasi Bersepadu Khazanah</td>
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<tr>
<td>PDR</td>
<td>(Lao) People’s Democratic Republic</td>
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<tr>
<td>PERHILITAN</td>
<td>Department of Wildlife and National Parks Peninsular Malaysia</td>
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<td>RMB</td>
<td>Chinese Renminbi</td>
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<tr>
<td>SANParks</td>
<td>South African National Parks</td>
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<tr>
<td>SAPS</td>
<td>South African Police Service</td>
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<td>SAR</td>
<td>(Hong Kong) Special Administrative Region</td>
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<td>SERNIC</td>
<td>National Criminal Investigation Service</td>
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<tr>
<td>TCM</td>
<td>Traditional Chinese medicine</td>
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<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
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<tr>
<td>USD</td>
<td>United States Dollar</td>
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<tr>
<td>VND</td>
<td>Vietnam Dong</td>
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Rhino horn trafficking remains a severe problem that needs to be addressed with a new sense of urgency as transnational organised crime. Over the past 10 years, the illegal killing of rhinos and trafficking of their horns has grown as a global criminal enterprise, comprising multiple criminal components dominated by greed and the pursuit of substantial profits.

This threat assessment presents a comprehensive analysis of rhino horn trafficking during the decade from 1 January 2012 to 31 December 2021.

It was compiled following analysis of 674 rhino horn seizure incidents collected from open-source reports that occurred globally during this decade, in addition to seven years of criminal intelligence and findings from Wildlife Justice Commission investigations into rhino horn trafficking conducted since 2015, and other open-source research.

This assessment aims to examine the driving forces behind the trade and changes in the criminal landscape. It also considers the threat to rhinos in 2022, with recommendations to help inform interventions to address this issue and ensure the global response is commensurate and appropriately targeted to current and future needs.
Impact of COVID-19

It is more than two years since the novel coronavirus (COVID-19) outbreak was first reported by China on 31 December 2019, causing unprecedented shutdowns across the world. Just as governments, businesses, and individuals globally grappled with the immediate and crippling effects of lockdowns, travel restrictions, and in many countries complete border closures, so too did the criminal networks. Sharp reductions in the number of rhinos poached in South Africa and global rhino horn seizures during 2020 indicate the abrupt impact of COVID-19 prevention measures in strangling criminal operations. However, this was only ever expected to be a temporary lull as criminal networks found ways to adapt to the new operating environment. As restrictions began to ease in many countries during 2021, the level of crime began to increase again.

1. Sanitised intelligence and findings from seven years’ worth of Wildlife Justice Commission investigations are interwoven throughout this threat assessment to provide context and insights into changes in the criminal dynamics of rhino horn trafficking. Where information is drawn from any other source, it is referenced with footnotes and acknowledged as such. Any non-referenced information, inferences or interpretation should be understood as being sourced from Wildlife Justice Commission intelligence analysis.
KEY FINDINGS

✓ The impact of COVID-19 on rhino poaching levels is complex. While poaching numbers in South Africa in 2020 were reported to be the lowest in over a decade, they began to increase again in 2021, signifying the lull was only temporary. Some poaching coordinators in Mozambique are known to have been more resilient and successful than others during the pandemic.

✓ Organised crime networks were heavily impacted by transportation challenges compounded by the fear of quarantine, which meant travel to other countries was risky. Transportation costs rose, major delays in receiving products meant that suppliers could not service their businesses, and clearance at airports facilitated by complicit customs officers was not as secure as it had been in the past.

✓ It is suspected that smaller traffickers and traders were hit harder by the pandemic challenges, while more established, high-level actors were able to draw on more resources to adapt to the changing conditions.

✓ Wildlife markets in Southeast Asia that relied primarily on Chinese customers have particularly struggled in the pandemic, and it is suspected that the lack of customers may have increased the online sale of rhino horn products to continue doing business.
This chapter highlights some of the impacts that COVID-19 has had on the criminal dynamics of the illicit rhino horn supply chain, from poaching to trafficking to markets and consumption, and adaptations that have been observed in the criminal networks. It is based on intelligence collected during Wildlife Justice Commission investigations, poaching and seizure data, and other open-source information.

**Impact on rhino poaching**

There were initially fears that wildlife poaching in general could increase during the COVID-19 pandemic, as many countries closed their national parks as part of social distancing measures and restrictions. The main concerns related to the financial losses associated with a lack of park visitors and tourism revenue, which is a major industry and funds park management and wildlife conservation activities in most African countries. The impact would extend to local people working in parks as trackers, eco-guards, and other roles servicing the travel and tourism industry, possibly leading some to turn to poaching as an alternate source of income if their jobs were threatened.  

There was also concern that poaching networks may perceive park closures or the reduced presence of rangers as ideal opportunities for exploitation. The absence of tourists from parks who may unwittingly act as “capable guardians” also increased this risk.

The Wildlife Justice Commission received intelligence that several known poaching organisers in Mozambique were intending to take advantage of the strict lockdown in South Africa during the April 2020 full moon period, with six different poaching teams set to enter Kruger National Park. At that time, South Africa reported no increase in poaching during the initial lockdown, and overall, the national rhino poaching figures for 2020 (394 rhinos killed) were the lowest in more than a decade. This was likely aided by the strict enforcement of curfews and lockdowns in South Africa and closure of the border with Mozambique for several months. In 2021 the rhino poaching losses for South Africa increased to 451, still 24% lower than pre-pandemic levels in 2019.

In Botswana, the pandemic did not disrupt the escalating trend of rhino poaching, with a 77%
increase in reported rhino killings in 2020 compared to 2019. However, elsewhere in Africa, it appears that rhino poaching continued at relatively stable levels or was reduced during the pandemic, again likely supported by global travel restrictions and border closures. Although it appears that overall, the early fears of increased poaching were largely not realised for rhinos, there was a reported increase in snare poaching for bushmeat in Kruger National Park and in Kenya.

One pertinent event from which the resultant impact is not yet clear, was the release of 83 Mozambican rhino poachers from South African prisons in July 2020. The prisoners received a presidential pardon and were returned to freedom to ease congestion in prison facilities during the pandemic. ANAC was reported to suspect that many have returned to poaching activities in the districts of Magude, Moamba and Massingir, and been part of incursions into South Africa to kill rhinos, but there is insufficient data to attribute the increase in rhino poaching in 2021 to the released poachers.

The experience of two major poaching coordinators in Massingir during the COVID-19 pandemic illustrates differences in the resilience of some criminals to the changes forced by lockdowns and travel restrictions. Both men were known to be prolific coordinators for several years with suspected connections to corrupt officials in Mozambique and South Africa, but while one excelled during the pandemic, the other struggled.

The first coordinator previously worked at Limpopo National Park in Mozambique, which has enabled his ongoing access into the park. Despite having a long history of direct involvement in poaching, all intelligence received from 2020 onward indicated he has been heavily involved in preparing and orchestrating poaching incursions into Kruger National Park, including personally buying supplies, transporting teams to the border of the park, and at times, remaining on location to collect the rhino horns afterwards. He is also known to diversify the recruitment grounds and penetration points into the park as a tactic to avoid law enforcement detection. By employing an agile, hands-on, low-cost structure, this poaching coordinator continued to operate successfully throughout the pandemic. His luck ran out in July 2022 when he was arrested by SERNIC in a strong

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9. Ibid.
13. Ibid.
operation, caught in possession of eight rhino horns he was expecting to sell to a potential buyer in Maputo. 14

Conversely, the second coordinator operated a larger business structure and did not have a profitable year from poaching in 2020. This coordinator is believed to run his operations from a purpose-built house in Massingir via delegates or employees, while also maintaining legitimate employment and additional community roles that likely offer him a degree of insulation from arrest or prosecution. Intelligence suggests he utilised corrupt connections within Limpopo National Park to provide counter-surveillance for rhino poaching incursions. His social media account includes an image of him handing cash to a suspected park employee and images of helicopters that may have been used to transport rhino horn and cash payments in Mozambique. This coordinator was reported to be struggling financially in 2020, with low yields from poaching attempts and few rhino horn buyers in Mozambique as many foreign traffickers returned to their home countries at the start of the pandemic. He was said to be selling a lodge he owned, possibly to offset his high operating costs and diminished poaching profits.

Impact on trafficking dynamics

“Business is really tight, and the bosses are worried. Can’t do any business.”

— VIETNAMESE TRAFFICKER, MARCH 2020.

The rhino horn seizure data shows that the illegal trade dramatically slowed as a result of the pandemic, but it did not stop. While travel restrictions, transportation challenges and increased border security all had a significant impact on trafficking dynamics, some very clear trends can be inferred from the seizure data analysis.

Both the total number of seizures and the total weight of rhino horns seized globally decreased by approximately half in the 2020-2021 period compared to the 2018-2019 period. 15 However, the average weight of African rhino horn shipments increased to their highest weights yet during the COVID-19 pandemic era, up 55% from an average of 28.7 kg per shipment in 2018-2019 to an average of 44.5 kg in 2020-2021. 16 The fact that the trade not only persisted, but shipments also expanded in size during the pandemic, could indicate a larger involvement of transnational organised

15. Refer to Key Finding (i) in Chapter 2 of this report for full details.
16. Refer to Key Finding (i) in Chapter 2 of this report for full details.
crime in the rhino horn trade that was finding ways to adapt to the new trafficking challenges. It is also suspected that moving larger shipments became more important during the pandemic to absorb increased transportation costs while still generating sufficient profits.

The 2020-2021 period saw the highest level of consistency and simplification of trafficking routes used, presumably due to the limited availability of transportation options. South Africa was the most significant African exit point for large rhino horn shipments, Malaysia consolidated its role as a key transit country, and Vietnam remained the major destination country. Furthermore, while the majority of rhino horn shipments were previously smuggled in passenger luggage, this transportation method became unviable during the pandemic due to travel restrictions preventing the movement of people. Instead, there was an increase in the volume of rhino horn being smuggled by air cargo.

At the beginning of the pandemic in early 2020, aviation security measures resulted in some sudden and unpredictable flight diversions that may have contributed to a few rhino horn seizures by throwing smugglers off their usual routes. For example, in March 2020 customs officers at Can Tho airport in southern Vietnam seized 28.7 kg of rhino horn carried in passenger luggage on a flight from Korea that had been diverted to Can Tho at the last minute to prevent a quarantine overload at Ho Chi Minh City airport.

Transnational organised crime networks were heavily impacted by transportation challenges and intelligence collected by the Wildlife Justice Commission indicated traffickers were scrambling to find ways to continue their business. The fear of quarantine meant travel to other countries was risky, transportation costs rose, major delays in receiving products meant that suppliers could not service their businesses, and clearance at airports facilitated by complicit customs officers was not as secure as it had been in the past.

“Can’t deliver, the transportation fee is very high right now.”

“Yes. Because of the coronavirus. It’s difficult now so they avoid it.”

— VIETNAMESE TRAFFICKER, FEBRUARY 2020.

17. Refer to Key Finding (ii) in Chapter 2 of this report for full details.
18. Refer to Key Finding (viii) in Chapter 2 of this report for full details.
“Security is too heavy at the border. Products can’t go out now. It’s just too difficult.”

— VIETNAMESE TRAFFICKER, MARCH 2020, REFERRING TO TRANSPORTING PRODUCTS TO CHINA.

While it is known that other commodities such as ivory and pangolin scales were being stockpiled in large quantities in Vietnam, Lao PDR, and Cambodia due to difficulties transporting products into China, this does not appear to have occurred with rhino horn. Rhino horns were still being traded domestically within Vietnam, and higher-level brokers were still able to offer transportation to China, but only 4 km over the border to Nanning or Pingxiang, and the buyer would be responsible for arranging their own onwards delivery.

It is assessed that smaller traders with fewer connections were hit harder by the pandemic challenges, while more established, high-level traders, including transnational organised crime networks, had more resources to draw on to adapt to the changing conditions. The experience shared by a Vietnamese trafficker in June 2021 epitomised this scenario. He said he had minimal involvement in rhino horn trade during the past two years because COVID-19 restrictions had impacted his ability to travel to and from Cambodia where his main client base was, and he experienced a general decline in interest from his Vietnamese customers. He appeared extremely disillusioned with the business and spoke numerous times of being ripped off by other traders and how bad the current market is. However, he was still attracted by the profitability of rhino horn trade and said he may become involved in the business again when the borders open freely again.

Impact on demand and consumption

Considering the ongoing appetite of traffickers to obtain rhino horn and the fact that it generally moves quickly through the trade, it is presumed that corresponding high levels of consumer demand continue to exist for rhino horn products. Perhaps the main impact of the pandemic on consumer demand is on the locations where it is sold.

For example, findings from Wildlife Justice Commission investigations suggest wildlife markets in Southeast Asia that relied on Chinese customers...
have particularly struggled in the pandemic. Tour
guides, taxi drivers, and shop owners in Cambo-
dia and Lao PDR lamented the lack of custom-
ers during visits in February and March 2020. It is suspected that the lack of cus-
tomers at physical markets may have increased
the online sale of rhino horn products to con-
tinue doing business, primarily on communica-
tion apps and social networking platforms that
can offer more privacy and security.\footnote{21}

In May 2020, Wildlife Justice Commission investi-
gators were proactively approached on Facebook
by two separate traffickers based in DRC who
were offering to sell rhino horns. In both cases
after initial contact was made, the traffickers
wanted to switch to WhatsApp for further discus-
sion and to send photos of the available horns. It
is an unusual and highly risky modus operandi for
a trafficker to be actively soliciting unknown pro-
spective buyers in foreign countries via Facebook,
but it was assessed as potentially showing the
traffickers’ desperation to sell their products dur-
ing the COVID-19 pandemic.

A UNODC study conducted in certain border areas
and trade hubs of Southeast Asia throughout 2020
indicated an apparent decline in market demand
for wildlife products linked to the perception that
the COVID-19 virus emerged from a wet market
in China. This decline in demand was believed to
principally affect wildlife that is consumed as food,
but traders anticipated that business activity and
demand would return to pre-pandemic levels when
restrictions were lifted, vaccines became widely
available, and fear of infection subsided.\footnote{22}
The study did not detect any specific findings related to
rhino horn consumption.

The Wildlife Justice Commission has also collected
intelligence suggesting some traders in Asia have
attempted to opportunistically market rhino horn
as a treatment for the COVID-19 virus, linked to its
traditional medicinal use to treat fever and detoxify
the body, and expected business to pick up during
the pandemic. It is not known to what extent buyers
are engaging with this ploy, but it demonstrates the
flexibility of criminals to quickly exploit a new situa-
tion in order to sell their products.

\footnote{22}{UNODC (2021), Illegal Wildlife Trade in Select Border Areas of the Upper Mekong Sub-Region During the COVID-19 Pandemic in 2020, reported at this link: https://www.reuters.com/business/environment/exclusive-wildlife-traffickers-creeping-back-pandemic-re-
strictions-ease-un-2021-09-21/}
Law enforcement and legal experts fighting transnational organised wildlife crime.