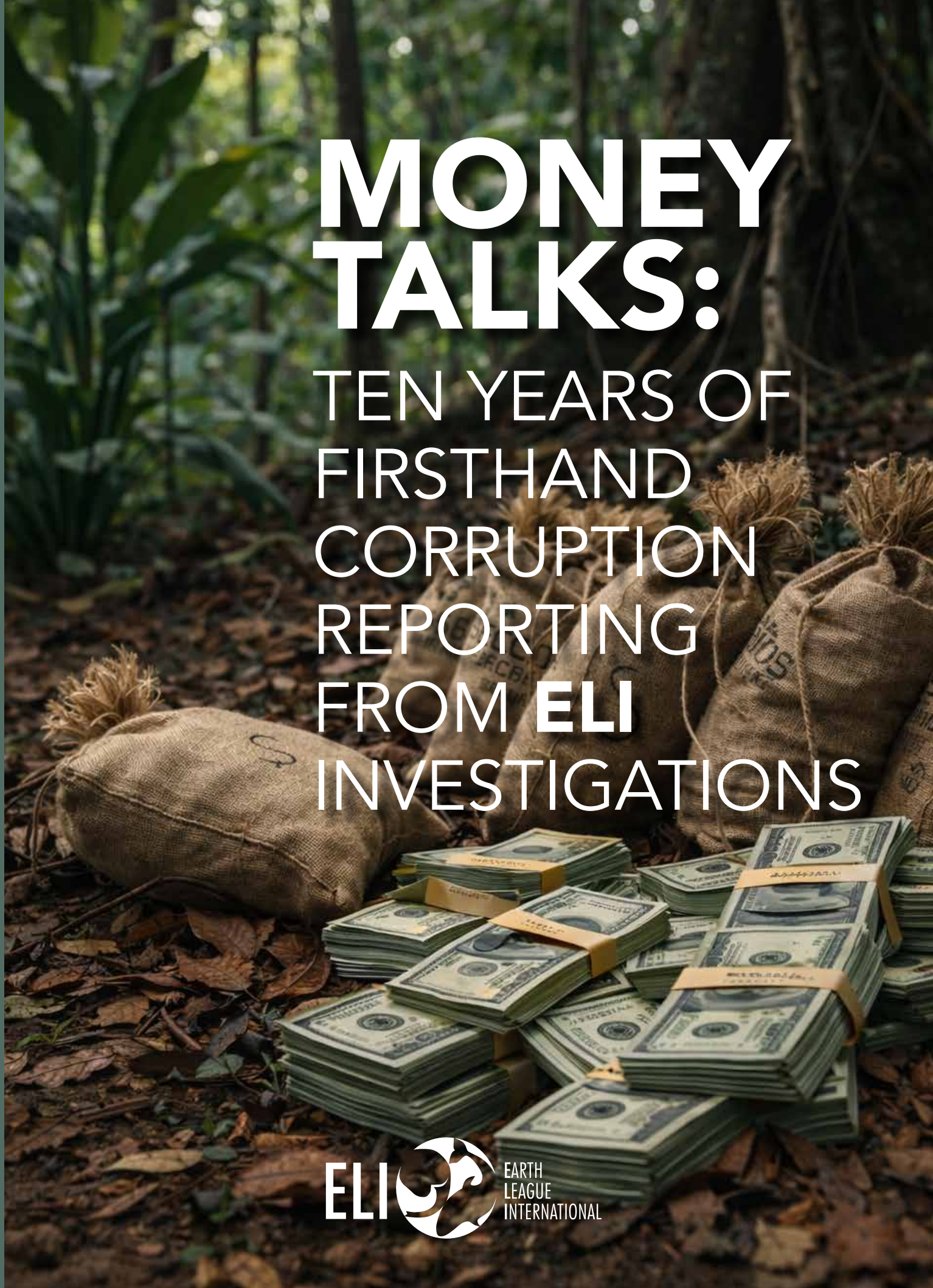
MONEY TALKS:

TEN YEARS OF FIRSTHAND CORRUPTION REPORTING FROM **ELI** INVESTIGATIONS



ELI EARTH LEAGUE INTERNATIONAL

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This report is produced by Earth League International. The findings, interpretations, conclusions, and views expressed are those of the authors and do not necessarily reflect the views of any individual partner organization.

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EARTH LEAGUE INTERNATIONAL

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EXECUTIVE SUMMARY

The foundation of this report lies in the firsthand and secondhand intelligence gathering of our undercover investigative teams.

Most existing analyses of corruption are built on open-source data, records of arrests and prosecutions, and/or interviews with law enforcement and other officials.

What is rarely available is an inside viewpoint, one that directly observes corruption as it unfolds from the criminal perspective, through the words and actions of those who pay bribes and manipulate systems to their advantage.

Earth League International has been conducting investigations and field operations into the illegal wildlife trade and environmental crime, and their convergence with other serious crimes, since 2013. ELI's undercover operatives are uniquely able to report on criminal activities by directly gaining information from those committing offenses. This offers unique and valuable opportunities to examine what differentiates criminals who stay in business without getting caught vs. those who are caught, as well as the ability to share detailed, actionable information with relevant authorities in near real time. ELI's undercover teams build relationships over years, and the trust and access they gain at personal risk results in uniquely detailed and timely insights about nearly every aspect of crime in the regions where we operate, from network structures to financial flows to the weak points in systems, borders, and institutions that traffickers exploit.

ELI's focus is on mapping Transnational Organized Crime (TOC) networks, unmasking and gathering firsthand information on persons of interest, and assisting our partners in understanding the players and illicit revenue streams across the U.S., Latin America, Africa, Southeast Asia, and Europe. ELI shares its intelligence with partners who can operationalize it across a wide variety of diplomatic, financial, and law enforcement tools. This enables numerous types of impact, including facilitating partners' access to Persons of Interest (POIs) and tech, the opening of investigations and criminal cases, the resulting arrests and prosecutions, and the implementation of diplomatic and financial and visa-related sanctions.

ELI deliberately avoids overreliance on seizure and arrest numbers—particularly low-level arrests that offer little investigative follow-up, or seizures with no long-term intelligence value—in favor of a broader approach focused on multi-pronged disruption of criminal activities, closing loopholes exploited by criminals, and significantly increasing their risks and costs of doing business. At the same time, ELI works closely with law enforcement to enable high-level, high-value arrests and seizures that generate substantial investigative and long-term intelligence benefits.

In places where environmental and wildlife crime are not prioritized–which is unfortunately all too common–offering information on crime convergence helps our partners attack TCOs committing these offenses from other angles, such as their involvement in drug or human trafficking.

In *Money Talks*, ELI analyzed over 10 years of information gained from its intelligence-gathering field operations and investigations on *how* corruption facilitates environmental and wildlife crime, and other illegal activities committed by the same TCOs. While the finding that corruption is ubiquitous around the world was not a surprise, ELI's field work produced deeper insights into how corruption functions as part of illicit economies, including its responsiveness to market shifts. A major finding was the extent to which bribe prices fluctuate in response to commodity prices, legal and regulatory changes, and pressure from law enforcement. In one instance, the head of a Fujianese wildlife trafficking network in Bolivia explained that bribe amounts to police had increased fivefold due to increased enforcement, from $200 to $1000.

In addition, information from ELI's sources showed that TCOs are often far more sophisticated than simply waving a wad of bills at an underpaid officer or civil servant: criminal networks conduct in-depth assessments of factors that make someone susceptible to bribes or threats, from debt to family relationships to political transitions. The more embedded corruption becomes, the more difficult and dangerous it becomes to combat organized crime. Ultimately this rends the social fabric in all directions: agencies refuse to collaborate due to distrust, whistleblowers will not come forward for fear of life-ending leaks, and the public loses confidence in its leaders and institutions. All of these outcomes of corruption hand additional victories directly to TCOs.

It is essential to understand that as corruption shields TCOs from accountability, they grow wealthier, which in turn makes them bigger, stronger, and more resilient. Protected proceeds allow TCOs to diversify their activities–both licit and illicit–increasing their adaptability and ability to survive disruption efforts that focus on only one revenue stream.

Part of the reason that corruption is such a force multiplier for environmental and wildlife crime comes from the stark contrast between bribe amounts and the amount of markup and profit in illicit supply chains. For example, the average price of a bribe to a magistrate in Nigeria is $20,[1] around the same price as the initial sale of a live pangolin.[2] However, a kilo of pangolin scales can ultimately sell for $3500.[3] This wild profitability allows criminal networks a wide reach and generous hand for bribing complicit enablers in governments as well as in the private sector.

Proof of cash shown to ELI's investigators

KEY FINDINGS

- Corruption is a primary enabler of crime convergence because it protects TCOs' growth, revenue streams, territorial expansion, and activity diversification.

- Bribes are responsive to market forces and vary by value and volume of cargo as well as by perceptions of risk, sometimes rising dramatically during periods of tightened enforcement or oversight. ELI discovered examples of re-negotiated bribe amounts based on factors such as increased penalties for specific crimes.

- Crime convergence allows TCOs to shift their operational and financial foci with relative ease and speed according to market forces and enforcement pressures. ELI received firsthand information from sources in multiple countries regarding criminal networks' responses to shifts in their risk/benefit analyses.

- Defenses against environmental crime are only as strong as the weakest link in a country or region. Criminal networks investigated by ELI were very savvy about knowing which border crossings or embarkation points for exports were most susceptible to corrupt facilitation, which businesses would launder illegally obtained commodities into legally obtained supplies, and which private sector enablers would provide falsified documents for transport.

- Low penalties and low prioritization of environmental crime and corruption continue to incentivize participation by both public and private sector individuals, highlighting the urgent need for more robust enforcement of laws and more holistic building of cases that include and penalize the key enablers that TCOs rely on. Using a crime convergence framework can result in bigger cases with more disruptive capacity by targeting large swaths of networks, higher-level players, and more of their assets.

- In many countries, corruption is sufficiently pervasive to include senior officials, some of whom are actively involved in environmental and auxiliary crimes vs. more passively enabling them. The lack of oversight and accountability in these environments continues to be one of the toughest impediments to effectively fighting illegal activities.

- Various technologies, from imagery to secure digitization to AI, show great promise in helping identify anomalous behavior, but remain vulnerable to not only lack of resources but lack of political or administrative will to act on the information, underscoring the need for transparency and public access.

ILLICIT SUPPLY CHAINS

At the heart of the paper, ELI looked at its decade of collection on corruption along a supply chain framework to find patterns and vulnerabilities that represent actionable intervention opportunities, with a goal of helping government agencies and other stakeholders devise effective means to combat corruption at each value addition stage of illicit economies. This supply chain analysis section of *Money Talks* includes 45 concrete examples, or mini-case studies, obtained via first and secondhand intelligence, with dozens of others in other sections of the paper on specific types of enablers, such as judges, and the role of complicit Chinese entities and officials.

1. **Point of Origin**: The examples explored in this section covered deforestation, IUU fishing, wildlife crime, illegal mining, and land grabs in Latin America, Southeast Asia, and Africa. The key takeaway is that at the beginning of supply chains, corruption facilitates access to areas that are ostensibly protected and should be inaccessible for exploitation. This included nature reserves, national parks, Indigenous territories, and marine protected areas.

2. **Intracountry Transit**: Illicit products sometimes must travel long distances from the point of origin to where they can be laundered and sold. When looking at ELI's information regarding the ways that corruption facilitates this transit, we found a wide range of enablement by law enforcement and military personnel, from turning a blind eye to contraband to actively protecting shipments of it.

3. **Processing**: Due to the difficulties of determining an illegally sourced log, piece of metal or mineral, or fish from a legally sourced one, laundering natural commodities that are not inherently illegal is easily facilitated by falsified paperwork. Experts on illicit supply chains, particularly in fisheries, generally agree that pinpointing and acting on illegally obtained items generally needs to happen before the processing stage.

4. **Point of Sale**: Falsified paperwork and loopholes that allow traceability and verification systems to be thwarted at the point of sale were essential components to every illicit commodity that ELI investigated. This was equally true of timber, wildlife, seafood, and cattle laundering, pointing to an urgent need for digitized, tamperproof paper trails that show clear accountability for every commodity that can be laundered into legal supply chains. Corruption among those with the responsibility to keep this laundering from happening was common and almost entirely unaddressed even when commonly known, suggesting that better oversight systems for documentation are also necessary.

5. **Export and International Transit**: A global army of complicit Customs agents, export authorities such as CITES authorizers, dockworkers, airport employees, and other enablers make sure that illicit shipments reach markets. Officials may turn a blind eye to paperwork irregularities or actively participate in falsification. Payments are based on cargo value, volume, and perceived risk. As noted above, TCOs are savvy and thorough in assessing vulnerabilities of both points of departure and ports of entry, and endlessly adaptable to shifting situations. For example, in jurisdictions where illegal wildlife products are more likely to be detected and intercepted, traffickers will add additional levels of processing to evade notice, turning shark fins into noodles and pangolin scales or seahorses into powders.

This part of supply chains is where ELI found the most private sector enablers, which are essential to moving illegal products to consumer markets. While officials at ports of departure can waive inspection or otherwise help ensure that contraband shipments leave an embarkation point without interference, those in the transport logistics sector facilitate their arrival at destination points by ensuring that the contraband remains obscured, both physically and in paper trails. Consequences such as fines or bad publicity can be very effective in addressing private sector corruption, as companies distance themselves from bad actors to avoid further penalties, keep investors, and prevent the loss of future business. International private sector logistics offer unique opportunities for intervention because companies have different interests and vulnerabilities than governments.

Port of Hong Kong

INTRODUCTION

The foundation of this report lies in the direct, firsthand experiences of our undercover investigative teams. Most existing analyses of corruption are external, built on open-source data or accounts of arrests and prosecutions. What is rarely available, however, is an inside perspective, one that observes corruption as it unfolds, through the words and actions of those who bribe, negotiate, and manipulate systems to their advantage.

This report offers an unprecedented perspective on corruption, seen through the eyes of the criminals themselves. It draws on years of undercover work by our teams, who gained the trust and confidence of some of the world's most significant environmental criminals — transnational traffickers, money launderers, and other key actors behind the global destruction of nature.

In this report, we synthesize what we have learned about corruption directly from those who perpetrate it, after more than a decade of field investigations into environmental crime and its convergence with other serious offenses worldwide. As we tracked those responsible for deforestation, illegal mining, wildlife trafficking, and illegal fishing, often operating across multiple continents, we uncovered how corruption functions as the common denominator that enables these criminal economies to merge, evolve, and thrive.

Over the years, we have personally witnessed dozens of corruption events—meetings, negotiations, payments, and informal "arrangements"—observed, documented, and often filmed by our undercover teams. **This perspective from within these networks provides a rare and detailed look at how corruption truly works**: how traffickers and brokers build and maintain relationships with corrupt officials, how they calculate bribes, how the money moves, and how professional enablers, from Customs agents to public officials, keep the system running.

The core of this report consists of a series of forty-five examples that document corruption events witnessed, recorded, and analyzed by Earth League International across different regions of the world. These cases are drawn from years of field operations and provide concrete, verifiable examples of how corruption operates in practice — through interactions, exchanges, and informal arrangements between criminal actors, intermediaries, and public officials.

Together, these cases not only illustrate real corruption dynamics but also form the empirical foundation of the broader analysis presented in this report. They also offer an exceptional insight into the mechanisms that enable and sustain environmental crime at every level.

By documenting corruption as it unfolds inside converging criminal economies, we expose its central role in sustaining illicit supply chains and protecting the financial interests of those who plunder natural resources. These mini case studies reveal the vulnerabilities that exist at the intersection of environmental crime, organized crime, financial crime, and often national security. **Understanding corruption from this point of view—the criminals' point of view—is essential to designing strategies capable of disrupting both their operations and the illicit financial flows that sustain them**.

We have prepared this report as a concrete contribution toward a deeper understanding of corruption, how it functions behind the scenes, and how criminals think and operate when they engage in bribery. Our goal is to enrich the collective knowledge on corruption and its dynamics, helping to develop better tools, solutions, and strategies to combat this pervasive virus within our societies.

This report is intended for law enforcement and government agencies, intergovernmental organizations, policymakers, investigative journalists, academics, NGOs, private sector actors in commerce, finance, logistics and tech, and all those committed to gaining a more profound understanding of corruption and its role in enabling environmental and transnational crime.

Building on this unique field perspective, the following sections analyze how corruption functions within transnational criminal operations, its economic logic, its adaptability, and its devastating impact on governance and conservation.

From this large body of intelligence, summarized and redacted in this public report, dozens of ***Confidential Intelligence Briefs (CIBs)*** have been produced and shared over the years with government agencies, intergovernmental bodies, and other key stakeholders worldwide, continuing to inform investigations and policy responses.

"Money Talks" is the synthesis of ten years of investigative intelligence, a look into corruption not from the outside, but from within the machinery that drives environmental destruction.

I.

HOW CORRUPTION SHAPES OUR WORLD

Public perceptions of corruption are generally of a dishonest official soliciting or accepting a bribe from an individual or organization involved in illegal activity or trying to gain an unfair advantage. The reality is much broader than this type of transaction. Transparency International defines corruption as the abuse of entrusted power for private gain. Webster's Dictionary's first entry is "dishonest or illegal behavior especially by powerful people". This means it applies to both the private and the public sectors, ranging from the darkest corners of the underworld to the most high-profile corporations in the business sector. Corruption can be anything from a long-term relationship to a one-time arrangement to a unilateral crime of opportunity. There is often not a bright line between criminal networks and businesses that engage in corruption to increase profits at the expense of the environment; more often they are entwined.[1]

Corruption can be found in every part of illicit (and many licit)[2] supply chains worldwide, and its pervasiveness varies. Renowned corruption expert Sarah Chayes has referred to it as the "operating system" in dozens of countries,[3] firmly rejecting perceptions that corrupt acts are generally isolated and committed at the individual level. For example, her in-depth 2017 study of Honduras analyzed the country as an example of systemic official corruption.[4] GI-TOC has found that criminals' confidence in their ability to operate unpunished due to corruption is a main driver of environmental crime.[5] Officials who abuse their power sometimes do so on a large scale, making detrimental regulations and policies that offer the veneer of legality, such as changing land use designations.[6] [7] [8] During fieldwork, ELI's investigators heard persons of interest use the phrase "Money talks" across cultures and continents.

Those in key private sector roles–Frank Vogl labels them "the enablers" [9] –can and do abuse the public trust bestowed their titles, licenses and business permits to aid illegal activities at every stage of supply chains. They blur the lines between the business community and the underworld. While some of the best-known enablers are lawyers and accountants because criminal networks rely so heavily on them, anyone can misuse a business or title in service to illicit activity. "Consultants" are a notoriously murky category of enablers whose fees can be used to hide a range of sins, including astonishingly large corporate bribes.[10] ELI's investigations on environmental and wildlife crime often point to corrupt logistics and shipping personnel.

By design, of course, most modalities of corruption are hard to detect. Much of what is published comes from surveys on the public's perception or direct experiences with corruption. In some areas, cash is still commonplace, but other money movements are highly sophisticated. Officials may be bribed with illegal commodities or luxury items. As prosecuted cases likely represent a skewed sample set, no one can name with certainty the key differentiators between detected and undetected corruption, making ELI's undercover work essential to shed light on the hows of impunity. The same logic extends to trafficking logistics: what is most widely detected may not be the most commonly used, it may simply have a vulnerability that makes detection more likely.

The pervasiveness of official corruption in a country matters a great deal in shaping strategies to confront it and the crimes fueling it. Where corruption is not systemic, there is reasonable assurance that laws and accountability processes will have some success (though penalties are often lenient). However, in many places there is no such assurance. For example, in Mexico, a country that struggles with corruption at all levels, 731 reports to the country's Special Prosecutor for Corruption under the López Obrador administration resulted in a single conviction.[11] Where institutions and the officials running them are mostly compromised, state bureaucracy becomes part of illicit networks. Furthermore, as Mongabay and EarthSight pointed out in an investigation on Indonesia, elected officials who illegally benefit from their positions put this money back into their campaigns, creating a negative cycle keeping them in office.[12]

In the Colombian Amazon, every official who met with ELI's team stated, in the words of one of them, that corruption exists "in every aspect of political, social, and economic life". Officials could often not even document the criminal groups present or their activities due to the risk. In these environments, press and civil society speech and actions against crime and corruption also become much more fraught,[13] making it difficult to assess or even acknowledge what is happening. Functionally, this completely erodes any meaningful checks on the growth and power of criminal networks. In Peru in May 2024, 67 out of 130 legislators were under criminal investigation;[14] later that year the legislature struck corruption offenses from organized crime statutes. Shortly before that, every living Peruvian president was under investigation.[15] Perhaps relatedly, a 2025 poll found that 75% of Peruvians reported being afraid to leave their homes.[16]

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II.

FORCE MULTIPLIER: THE EFFECTS OF CORRUPTION ON THE ENVIRONMENT

Corruption can be a single point of failure in efforts to protect the environment. Unfortunately, it often comes cheaply, especially weighed against the profit margins of many environmental commodities.[1] [2] A 2024 UN survey of corruption in Nigeria found that the highest bribe amounts went to judges and magistrates–and the average amount was only 31000 naira, or approximately $20.[3] Even when corruption comes cheaply, the damage it enables is expensive. While estimating the global cost of corruption is methodologically difficult,[3] [4] The World Bank estimated in 2019 that $1-2 trillion was lost per year to illegal logging, fishing, and wildlife crime.[5] Illicit trade in environmental and wildlife products are widely believed to be bigger, more lucrative markets than their legal counterparts in multiple parts of the world. The result of these enormous illicit markets is a vast overconsumption of resources, putting pressure on already-threatened ecosystems and species. It's unlikely that corrupt actors consider the cumulative effects of their greed on the world, but the aggregated effects are staggering.

Ofir Drori, the founder of the EAGLE, has posited that corruption is a larger obstacle to combating wildlife crime than lack of capacity.[6] José Ugaz of Transparency International calls corruption a threat multiplier that hastens tipping points.[7] In an era where global wildlife populations dropped by an average of 70% from 1970 to 2020–and by a devastating 95% in Latin America and the Caribbean[8] –we can't afford force multipliers. Habitat destruction and climate change pose existential threats to biodiversity even before factoring in criminality. The National Whistleblower Center noted that multiple studies have found strong correlations between deforestation rates and national perceptions of corruption.[9] The Amazon rainforest has become a net carbon emitter rather than one of the globe's largest carbon sinks, due in large part to rampant corruption-aided illegal deforestation.[10]

Timber: Data have shown over decades that the majority of timber logged from South America is harvested illegally. A 2025 report from a Brazilian NGO found that a whopping 91% of deforestation in the Brazilian Amazon from 2023-24 was illegal.[11] Twenty years prior, the World Bank estimated that 70% of timber from Ecuador, and 80% from Peru and Bolivia, was harvested illegally, with comparable proportions for Indonesia, Cambodia, and Papua New Guinea.[12] Africa also struggles with widespread deforestation for illegal timber markets in places such as the Congo Basin, where 30 percent of forest cover was lost between 2000 and 2022.[13] [14] One 2018 report claimed that not a single rosewood tree was left in Benin or Gambia.[15] ENACT Africa and EIA have reported extensively on the bribes paid by Chinese exporters and local criminal groups to facilitate this destruction across Africa.[16] [17] [18] [19] [20] [21]

Mining: Gold is in some countries the single biggest source of revenue for TCOs[22] and is another environmental commodity in which illicitly sourced goods likely dwarf their legally obtained analogues. A 2016 GI-TOC paper estimated that in Ecuador, Colombia, and Venezuela, the proportions of gold that were mined illegally ranged from 77% to 91% of the countries' respective production.[23] More recently, the Pulitzer Center cited data from the Brazilian Ministry of Development, Industry, Trade and Services that gold extracted from the Amazon, much of it illegal, almost doubled between 2017 and 2022, from 11.6 to 22 tons, valued at R$6.6 billion.[24] [25] As far back as 2013, Peruvian officials estimated that the illegal gold trade was worth almost three times as much as the drug trade.[26]

The illegal wildlife trade (IWT): The illegal wildlife trade is worth up to $20 billion a year, according to Interpol.[27] Its 2024 Operation Thunder seized an astonishing range and volume of flora and fauna worldwide, including 20,000 live animals of protected species.[28] Damages are far more extensive than what's revealed by sales and seizure figures, given high mortality rates[29]. For example, the trafficking of birds for the pet trade can result in a 90% casualty rate; that is, for every successful sale of a poached parrot, nine may have died en route.

IUU fishing: The World Economic Forum estimates that up to 20% of the global fish catch is from illegal, unreported, and unregulated (IUU) fishing.[30] Illegal fishing operations engage in destructive practices that make it hard for species to recover, such as fishing in breeding grounds or during no-take seasons meant to allow juveniles time to mature and reproduce. They are at best irresponsible about bycatch, damaging populations of non-targeted species such as sea turtles or marine mammals. At worst, these fisheries intentionally slaughter species other than their stated targets, as when tuna and squid fleets engage in shark finning.[31] Illegal fleets turn off tracking systems to plunder other countries' national waters and protected areas.[32] Much IUU fishing takes advantage of the lack of enforcement on the open ocean, adding opacity to fisheries and making it hard to assess the extent of ecosystem damage or hold perpetrators accountable.

Corruption amplifies existing regulatory weaknesses, providing openings for criminals who understand that regional defenses are only as good as the weakest link. For example, lax import laws in San Marino, combined with corruption there and in Italy and aided by open Schengen borders, made it easy for traffickers to import and distribute illegal TCM products throughout Europe. Similarly, Peru's combination of systemic corruption and lax export controls make it the favored export hub for South American shark fins sent to East Asia. It's not only direct complicity that causes harm; corruption *indirectly* tied to environmental crime also has significant detrimental effects that should not be overlooked. Embezzlement of official funds deprives already underfunded protected areas and their personnel of much-needed resources from prevention to remediation.[33] [34] [35] Infrastructure projects such as dams or mines that lack adequate technical standards and environmental safeguards because they were awarded via bribery pose serious, large-scale threats to ecosystems. Immigration fraud bestows legal residency on criminals that facilitates their operations and ability to launder money. Long-lasting health harms occur in communities and ecosystems as a result of corruption-enabled degradation, such as mercury poisoning from illegal gold mining.[36] [37]

Corruption is not the sole purview of less wealthy nations. It is everywhere. During investigations into illegal wildlife trafficking for TCM in Europe, for example, ELI found enablers in San Marino, Italy, Belgium, and Poland - even as POIs commented on tight EU checks overall.

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III.

CORRUPTION ALONG SUPPLY CHAINS: MAPPING NODES AND MECHANICS

Environmental crime doesn't happen in a vacuum—it is enabled, expanded, and protected by corruption. From the moment a resource is illegally extracted to the point it is sold to an endpoint consumer, corrupt actors facilitate the movement of illicit goods through each link of the supply chain. This section illustrates actors, criminal activities, and corruption methods at each stage of supply chains, exclusively using examples gathered during ELI's investigations, including direct quotes from traffickers obtained first- or secondhand by ELI.

Looking at corruption in this framework helps to clarify specific corruption vulnerabilities within different illicit commodity supply chains, with an eye to tailoring interventions accordingly. In some cases, interventions close to the origin points are essential; for example, there is wide agreement among IUU experts that detecting fisheries crime after landing or at-sea transfer is nearly impossible. In other supply chains, difficulties addressing crime at the source may necessitate additional due diligence at the point of export/import or sale.

POI and **Network** Naming Conventions

POI and Network Naming Codes are used throughout this section. Here is how ELI creates those codes:

Networks

Country or regional code
(Capital letters) + number(s) (e.g. SA#)

Persons of Interest (POIs)

Country or regional code
(lower case letters) + number(s) (e.g. Sa37)

* **NOTE**: The order of these supply chain points varies and they are not always in the example order presented here. Some types of corruption, such as the falsification of the origins of cattle illegally reared in the Amazon, happen throughout the entire supply chain.

* For work that is ongoing, we've used the present tense to describe the activity.

Costa Rica, shark fins from illlegal shark fishing in the Coco Islands

1. **Point of Origin**:

How Corruption Functions at This Stage

Corruption begins right at the origin points of illicit supply chains, often when natural resources or wildlife are sourced from areas that are designated no-go zones. Corruption in permitting and titling processes facilitates massive land grabs, opening and regularizing the use of "protected" areas for illegal deforestation, mining, and poaching. Permitting and licensing authorities accept bribes for fisheries and loggers to take more than allowed, or to take different species than permitted, and inspectors then also accept bribes to look the other way. Indigenous and tribal leaders are sometimes co-opted by TCOs. Infrastructure built to access "protected" areas for logging or mining increases opportunities for wildlife trafficking, an example of crime convergence. ELI sources and official contacts affirmed that in much of the Amazon, the top driver of deforestation is illegal cattle ranching that begins with land grabs. ELI confirmed this on the ground in Guaviare, Caquetá and Meta Departments in Colombia, where the number of illegally-reared heads of cattle outnumber those legally raised.

KEY MECHANISMS AND FIELD-BASED EXAMPLES

ACCESS TO NO-TAKE ZONES SUCH AS NATIONAL PARKS, MARINE SANCTUARIES, AND INDIGENOUS LANDS

- **Bolivia - Illegal Mining Tolerated via Bribes to Indigenous and Political Leaders:** SA4, a Bolivian-Chinese criminal network with ties to Chinese state-owned companies, bribed a local politician and an Indigenous village chief to obtain permission to illegally mine gold in the smaller rivers around Río Suapi and Río Alto Beni. They also bribed the police vice chief to ensure that their illegal casino business in Santa Cruz ran unimpeded.

- **Cambodia - Zookeepers Selling Rhino Horns:** In the mid-2020s, POIs Cam1 and Cam2 sourced rhino horns from a zoo in Phu Quoc with the help of corrupt zookeepers. According to Cam2, Cam1's partner and a wildlife trafficker in Cambodia: *Now it's hard to get rhino horns from Africa to here. But in Phu Quoc island there is a zoo with over 20 to 30 rhinos and some rhinos there have no horns. Why? The zookeepers sold them out*.

- **Colombia - Multi-sector Enabling of Land Grabs for Cattle Ranching:** ELI's fieldwork in the 2020s exposed widespread complicity between large landowners who illegally clear protected areas, criminal groups, and land titling and agricultural authorities. Government-owned land in parks or preserves is cleared by land grabbers. Once the land has been worked for a length of time, the land grabbers claim ownership with the help of corrupt local officials and notaries, fraudulently obtaining deeds and then selling them. POI Sa185, a large-scale cattle rancher operating in Guaviare involved in deforestation and bribery schemes to legalize land and cattle, claimed that with enough money, people could get tacit permission from the CDA to cut down over 200 hectares of trees.

- **Costa Rica - Illegal Shark Fishing in the Coco Islands:** In the early 2020s, ELI collected information on fishermen bribing local authorities for access to the Coco Islands Marine Protected Area to catch endangered hammerhead sharks.

- **Mozambique and South Africa - Some Tribal Authorities Supportive of Illegal Wildlife Trade.** In the late 2010s, ELI sources confirmed that some tribal authorities in the Nyawo Traditional Area, which straddles Mozambique and South Africa, were either tolerant of or directly supportive of the illegal wildlife trade. Amid tensions between the communities and conservationists, plans were discussed to move 52 elephants out of the Nyawo Traditional area for fear that complicit tribal authorities would support and benefit from elephant poaching.

- **Panama - Cocobolo Timber Extraction from Protected and Indigenous Areas:** As of 2023, criminal network PA3 exported cocobolo timber and secured concessions through agreements with local Indigenous chiefs to then obtain final approval from the Panama Forest Authority. POI Sa153, an illicit timber trade facilitator: *Every village here has some Indian chief [sic], and we need to get him on board first to do the logging and there is also big chief in the region we need to sort out before logging. The forest ministry has sustainable logging plan, and we need to get the Indian tribes chiefs on board first. Panama is systematically corrupted, and we need to bribe the officials at all levels, and this is how things work in Panama. Very corrupt. Money talks.*

PERMITTING FRAUD AND INSPECTION FALSIFICATION (LOGGING, MINING, FISHERIES)

- **Colombia - Authorities Solicit Bribes to Falsely Certify Livestock Origins:** Sources from rural Colombian Amazon communities reported to ELI in the early 2020s that Instituto Colombiano Agropecuario (ICA) employees responsible for certifying cattle's legal origins sometimes solicited bribes, telling ranchers, "*Give me money and I won't bother you.*" ELI's government contacts at other agencies corroborated that ICA focuses on cattle vaccinations and largely turns a blind eye to other portions of its mandate.

- **Mexico - Fisheries Officials Abetting Illegal Fishing and Overfishing:** A 2022 case uncovered a licensing scheme where dozens of fishing cooperatives in the Gulf of California—many of which had ties to trafficking networks—were granted permits that exceeded sustainable quotas. Fisheries department officials accepted bribes, ensuring that inspections remained lenient and that illegal fishing activities were shielded under the guise of legitimate operations. POI Us3 is an intermediary in this region who manages paperwork falsification and coordinates with corrupt inspectors for totoaba fishing.

- **Suriname - Mining Inspectors Accept Bribes to Overlook Jaguar Trafficking:** From at least the late 2010s, Chinese wildlife traffickers paid miners near the Suriname-Brazil border for jaguar teeth, bones, and pelts, which were then smuggled out disguised as gold shipments. This operation thrived for years due to the cooperation of mining inspectors who accepted bribes to overlook it.

- **Thailand - Corrupt airport official conceals rhino horn for Bach trafficking network:** In a 2017 operation, ELI investigators discovered a quarantine officer at Thailand's Suvarnabhumi Airport attempting to conceal a 12.5 kg South African rhino horn shipment, which helped link Thai POIs to the notorious Bach family wildlife trafficking syndicate and led to arrests by Thai authorities.

Bangkok, rhino horn seizure facilitated by ELI

2. **In-Country Transit**:

How Corruption Functions at This Stage

Once illicit goods are extracted or harvested, they must be transported–often across vast distances–to reach export points or domestic markets. At this stage, traffickers rely heavily on complicit law enforcement and military personnel, bribing officials at internal checkpoints to ensure safe passage. Complicity here can be as hands-on as officials personally providing physical protection for criminals and shipments, or as simple as turning a blind eye.

KEY MECHANISMS AND FIELD-BASED EXAMPLES

BRIBERY OF POLICE, MILITARY, OR MUNICIPAL OFFICIALS AT CHECKPOINTS FOR SAFE PASSAGE

- **Colombia - Cattle Transport from Protected Areas with Local Bribes:** Cattle raised on illegal ranches in protected areas are moved to legal ranches prior to sale via bribed road checkpoint officials, often in collusion with local police and armed groups. Some of ELI's POIs reported a relationship with an ICA employee who helped them obtain transit permits. POI Sa185, the son of POI Sa184, a farm owner in Colombia: *The highway is illegal…the people nearby, they are very rich because of the stock raising. They construct the roads themselves.* Local ranchers admitted to paying bribes at gas stations and rural checkpoints to keep vehicles and machinery for land clearing running smoothly.

- **Colombia - Evading Checkpoints Via Police Connections:** A member of the SA3 network discussed the necessary relationships to pass road checkpoints between the Caribbean coast and Bogota with illicit marine wildlife products such as shark fins. POI Sa15, a wildlife trader in Ecuador*: There is another option by land from here (Cartagena) to Bogota. But you may be subject to random roadblock by the police and so you need solid local government connections from Bogota. As the police can do road check*

[sic] from here to Bogota, then you need the police high level contact in Bogota to take care of this. Money is the key here.

- **Guyana - Checkpoint Bribery for Shark Fin Shipments:** Traffickers regularly move fins from inland holding areas to ports using bribed law enforcement officers and shipping companies. POI Sa10, the leader and logistics manager of Network SA1, coordinates shark fin shipment movements and distributes bribes across Guyana and Suriname.

LOCAL LAW ENFORCEMENT ACTIVELY PROTECTING TRAFFICKERS AND CONTRABAND

- **Ecuador - Police Collusion in Shark Fin Transport:** Traffickers such as POI Sa37, a middleman working with Chinese traffickers responsible for the inland collection and movement of shark fins across Ecuador, obtain police protection for shipments with bribes.

- **Mexico - Coordinated Bribery of Police and Military to Escort Shipments:** Network M3–which operates in underground banking, narcotics distribution, illegal logging, and human smuggling in collaboration with Chinese and Mexican TCOs–as of at least 2024 bribed law enforcement and military personnel to protect shipments of totoaba and TCM products.

- **Panama - Police Escorts for Traffickers:** ELI investigators captured video footage of uniformed Panamanian officers escorting traffickers as they moved through city streets and near border crossings. Complicit police officers helped transport cocobolo timber from the south of Panama to Panama City for onward export to China.

3. **Processing**:

How Corruption Functions at This Stage

During the processing of timber, fish, precious stones, and metals and minerals, illegally obtained goods are mixed with legally sourced ones, laundering them into licit supply chains. Laundering is especially effective with environmental commodities because most are not inherently illegal, unlike drugs or weapons. A cocobolo log, for example, can easily be passed off as a legal artifact if accompanied by the right paperwork. The visual sameness of goods regardless of how or where they were obtained facilitates easy laundering into licit supply chains at the processing, as does the sheer volume of commodities processed.

While ELI did not specifically focus on collecting information at this stage, we gained intelligence on specific facilities in different countries used to process illegal marine wildlife products to share directly with relevant authorities. ELI found that falsified documents were frequently already in place by the time these items were processed; something corroborated by fisheries experts we consulted. Experts broadly agree that the most effective anti-crime and anti-corruption interventions for fisheries must happen prior to the landing or transshipment of catch.[1] While corruption certainly occurs within seafood processors and sawmills by both private sector enablers and government inspectors, it is very difficult to detect at these facilities.

4. **Point(s) of Sale**:

How Corruption Functions at This Stage

The points of sale, like processing, facilitate the laundering of illegally sourced natural resources into legal markets, enabling traffickers to sell timber, seafood, or gold. This is achieved through a combination of fraudulent invoices, fake business licenses, false product classifications, and manipulated traceability systems. Inherently illegal commodities are hidden or deliberately mislabeled for undetected transit, with equally hidden or mislabeled financial transactions. Sales occur at multiple parts of the supply chain depending on the degree of processing and the number of intermediaries; we've grouped them here for simplicity.

KEY MECHANISMS AND FIELD-BASED EXAMPLES

DISGUISING ILLICIT COMMODITIES AND FINANCIAL FLOWS AS LEGAL SALES AND PROCEEDS

- **Colombia - Cattle Markets Used to Launder Livestock:** As previously noted, legal ranches are falsely documented as the point of origin for "jungle cattle" before or after onward movement and sale via livestock auction houses. This laundering is aided by a wide variety of enablers that includes veterinarians, cattle associations, and livestock auction houses. ELI also found evidence of employees at a cattle auction house faking ICA paperwork to falsely attest to cattle's origins. POI Sa120, who works for a company that plays a big role in Colombia's agricultural and livestock trading sector: *I can… change [smuggled cows'] origin to my farm here. The original place of the [cattle] are always changed. We keep changing the cattle's origin when we change hands.*

Colombia, illegal cattle ranching in protected areas

The [jungle] cows can be changed to here or anywhere in ICA. It's very difficult to know where exactly they are from. The…companies don't care [about] the origin too. As long as there is a license they are fine.

- **Ecuador - Commercial Seafood Companies Used to Sell Mislabeled Shark Fins:** During ELI's ongoing Operation Stella Maris, investigators have discovered complicit employees at commercial seafood exporters who move shark fin shipments by re-labeling and selling them as part of bulk seafood exports to Hong Kong and Guangzhou.

- **Corruption facilitates illegal wildlife imports into the EU -** Chinese traffickers sending illegal wildlife products for TCM into Europe by train relied on complicit individuals who ensured customs clearance in both Guangzhou and in Poland. POI Eu1: *The train route we use now is very safe for banned stuff as our customs clearance guy in China will sort out all issues in China and Poland.*

5. **Export and International Transit**:

How Corruption Works at This Stage

At this stage of the supply chain, corruption enables the movement of illicit goods across national borders–including maritime borders–on their way to destination markets. Traffickers are heavily dependent on bribery to ensure that illicit product exports are unimpeded, and thus this section is especially robust and rich in detailed examples from ELI's operations. Common corruption tactics include export permits obtained via bribery and the manipulation of documentation such as bills of lading with the help of both public and private sector actors. At ports and airports, bribes purchase the selective waiving of inspection, often paired with the expediting of specially marked cargo. Even when illicit cargo is seized, there are methods by which TCOs are able to get it back, via theft from storage or by fixing government auctions.

Private logistics company employees are sometimes complicit in hiding illegal exports, both physically and via paper trail tampering. More encouragingly, ELI also found private sector entities that wanted to help confront illicit trade; however, the pervasiveness of corruption was a determining factor in whether they succeeded in their efforts. For example, one shipping company leader in Africa tried repeatedly to engage a government agency to stop ivory flows, but despite providing direct evidence of document forgery and other crimes, the agency refused.

The networks that ELI has investigated are very savvy about their shipment routes, carefully building complicit relationships with officials from embarkation points, through transshipment points known for laxity, and at ports of entry in destination countries. ELI's POIs responsible for shipments were generally quite mindful of which countries' exports received extra attention at destination points, and routed shipments through less-scrutinized countries to avoid this attention. ELI also noted examples where wildlife products were given additional levels of processing to make them harder to detect in high-risk jurisdictions in North America and Europe. Some high-profile products such as pangolin scales were ground into powder, and at least one Stella Maris POI exported shark fins pre-processed into noodles for North American deliveries.

KEY MECHANISMS AND FIELD-BASED EXAMPLES

AUTHORITIES ACCEPT BRIBES TO GRANT EXPORT PERMITS FOR PROTECTED SPECIES

- **Colombia - Fisheries Official Facilitates Permit Abuses:** In Cartagena, Taiwanese POI Sa16 misuses a tuna fishing license to poach sharks and smuggle fish maws, with the help of a complicit fisheries official who provided export permits for the maws.

- **Guyana - CITES Permits Used to Legalize Shark Fin Exports:** In Guyana, traffickers declare shark fins from protected species as "dried seafood" or "sea cucumber," and export them using documents provided by complicit Ministry of Natural Resources and Revenue Authority (GRA) officials. ELI has traced shipments involving POI Sa10, the logistics leader of Network SA1, who paid $3,000 per container to clear customs.

- **Panama - Retroactive Legalization by the Environmental Ministry:** An ELI POI retroactively obtained export documents in 2023 from the Panamanian Ministry of Environment and Fisheries after the illegal shipments had already departed. These permits were used to sanitize the cargo at overseas ports. POI Sa153: *Panama is systematically corrupted, and we need to bribe the officials at all levels, and this is how things work in Panama.*

- **Suriname - Corrupt Official Facilitates Misuse of Permits for Wildlife Trade:** An ELI source identified a Dutch family in Suriname that has used their farm as a front for the poaching and trafficking of wildlife since at least 2016, with export permits obtained via corrupt official contacts. With these papers, the family contracted members of an Indigenous tribe to hunt protected species for Chinese buyers. The source named five others who used the same mechanisms to source, poach, and sell illegal wildlife.

BORDER CROSSING OFFICIALS WAIVE INSPECTIONS AND/OR ALLOW CONTRABAND TO PASS

- **Costa Rica - Bribes Clear the Path for Illegal Timber:** POI Sa90, a timber trafficker who owns a solar panel company, uses it to move cocobolo harvested from protected areas by poorly paid Indigenous communities. Chinese timber traffickers also import illegally harvested cocobolo timber from Nicaragua, where it is cheaper, into Costa Rica for onward shipment to East Asia. POI Sa130a, who with his wife also trades products such as shark fins and sea cucumbers, as of 2022 paid his contact in Customs $300 per shipment, and $500 to an unspecified party to move the timber from a truck on the Nicaraguan side of the border to a truck on the Costa Rican side.

- **Mozambique - Everything Smuggled at Crossings Without Checks:** During ELI's ivory trade investigations in the mid 2010s, the team found two favored border crossing points in Mozambique at Kosi Bay and Lebombo, where corruption ensured that neither passports nor vehicles received adequate checks. A South African police contact described the situation: *Vehicles are allowed to pass through the border crossing without proper vehicle checks (both directions)…drugs, cigarettes, and ivory are smuggled through the crossing.* A police contact on the Mozambique side of the border added that they were working to film bribery at the Golela crossing to identify the complicit police.

Mozambique, poached elephants skulls

- **Peru - Lax Regulation Makes Country Hotspot for Shark Fin Exports:** ELI's Operation Stella Maris has found that nearly all of Ecuador's shark fins are moved to Peru for export to East Asia, crossing between Huaquillas and Tumbes. POI Sa162 is a seafood trader based in Lima: *A lot of shark fins are from Ecuador, and some are also from Peru but most are exported to China or Asia from Peru as it's difficult and strict to export shark fins from Ecuador*.

- **Suriname - Routine Bribery Results in Lax Rural Border Crossing:** Traffickers exploit the Corantijn River crossings to transport jaguar parts and other illegal wildlife products between Suriname and Guyana. POI Sa10 claims that traffickers who pay bribes routinely bypass inspections and this route is a "safe corridor". Notably, POI Sa10 highlighted that this is not the case in French Guiana, where officials were not as easily bribed.

CUSTOMS OFFICERS AND OTHER PORT AND AIRPORT AUTHORITIES CLEAR AND/OR EXPEDITE CARGO WITHOUT INSPECTIONS, IGNORE PAPERWORK DISCREPANCIES, AND/OR DIRECTLY FALSIFY PAPERS

- **Italy - Willful Blindness to Document Irregularities:** Network E2, which smuggles illegal TCM products such as tiger bone and pangolin scales into Europe, allegedly bribed officers at an Italian port from at least 2019-2021 to accept shipments despite paperwork irregularities.

- **Mexico - Crime Convergence Includes Sharing Corrupt Official Contacts:** Mexican cartels–which have fully entered the marine wildlife trafficking spaces formerly dominated by Chinese networks–introduced two POIs to corrupt Customs officers who assist in smuggling illegal seafood products, including shark fins, to Asia. These officials provide clearance for shipments by falsifying documents, bypassing inspection protocols, and ensuring swift processing through Customs. POI Mx173, totoaba, seahorse, and shark fin trafficker, in response to ELI asking if totoaba can be shipped out: *Totoaba, yes, but you have to bribe the Customs, just pay them… If you want to get these back to China, it's 100% impossible. But if you want to ship to other countries, like Vietnam, there's basically no problem if you buy the Customs*.

- **Mexico - Bribe Amounts Negotiated by Level of Risk:** POI Us3, a logistics broker and trafficker operating between Mexico and the U.S., claimed in the mid-2020s that Customs clearance from Mexico could be secured for any littoral seafood shipment for $3-5 per kilo, depending on the volume and level of risk. He explained how using corrupt officials allows traffickers to bypass documentation requirements and avoid cargo inspections.

Suriname, shark fins

- **Suriname - Customs Official Personally Sells Wildlife Products:** One of network SA18's POIs is a Customs employee who also personally sells jaguar fangs, shark fins, and gold out of a family shop in Paramaribo.

- **Suriname - Jaguar Products Moved as Gold or "Wild Game" Meat:** POI Sa74, a Fujianese mafia money launderer and smuggler, made prolific use of bribes at ports and airports to move both illegal commodities and bulk cash. He smuggled jaguar products labeled as wild game meat or packed inside shipments of artisanal gold with the help of shipping agents and dock workers who accepted "tips" to prioritize the movement of cargo linked to traffickers. Port inspectors looked for pre-arranged cargo stickers that signaled "do not inspect" agreements. POI Sa74: *The Customs here in Suriname airport is very easy to bribe and sneak the stuff and cash out or in. Every time I go to the airport in Suriname, I bribe some Customs officer first to let me pass with the cash or other stuff. Each time, only a few hundred USD, I can sort them out.*

- **Venezuela - Corruption Too Pervasive Even for TCOs:** In Venezuela, corruption is so pervasive that wildlife traffickers have complained to ELI's investigators that they had to move shark fins to a second country in the region before they could ship to East Asia, because so many officials wanted a cut: POI 135, a shark fin trader, shipping container provider and leader of network SA22: *In Venezuela, I sourced a lot of shark fins but can't send them out directly…too many corrupt officials are watching for bribes.*

PIECING TOGETHER COMPLETE LOGISTICS ROUTES

ELI investigators pieced together examples of criminal networks' end-to-end relationships with complicit Customs officials at every shipment point, not only bribing officers at the points of embarkation, but also at midpoints and endpoints. This is significant, because ELI access is able to not only show where and how corruption facilitates exports, but illuminate complete logistics routes enabled by corruption and its role in making some logistics points preferred by TCOs.

- **Shark Fins from Latin America to Cambodia to China:** Operation Stella Maris has found that Cambodia is a favored transshipment point by traffickers sending shark fins to mainland China, possibly because shipments from major drug exporting countries such as Mexico and Ecuador invite additional scrutiny. POI Sa10 described to investigators how bribes in Cambodia facilitated the re-export of 20-ft shipping containers of shark fins.

- **Jaguar Parts and Shark Fins from Suriname to the Netherlands to China:** As of 2024, shark fin and jaguar traffickers exporting from Suriname favored Amsterdam as a transshipment point en route to China. For maritime shipments of fins, they knew that their containers would not be scanned at the port. Jaguar parts were also checked through Amsterdam's Schiphol Airport in luggage, thanks to complicit officials there. Jaguar trafficking networks routing fangs and other items from Suriname through the Netherlands favored final destination airports in Xiamen City and Guangzhou, where they could bribe Customs to not check inbound luggage.

PRIVATE-SECTOR COMPANIES FACILITATE IWT LOGISTICS

- **China - Large Logistics Company Complicit in Cross-Border Smuggling:** During ELI's rhino horn investigation in the mid-2010s, a POI asserted to an undercover ELI employee that a large China-based logistics company was fully witting of its role in shipping rhino horn, though other collection later suggested that it had started inspecting packages after receiving a fine for shipping ivory.

- **Costa Rica - Freight Companies Used to Disguise Shark Fin and Timber Shipments:** POI Sa90 described using Costa Rican freight forwarders connected to Chinese buyers. These firms specialize in mixed-cargo shipping and file declarations listing solar panels, sea cucumbers, or teak furniture—while concealing cocobolo timber or hammerhead fins in false compartments.

- **Ecuador - Freight Handlers in Guayaquil Used for Shark Fin Exports:** POI Sa37 manages air and sea freight for a Chinese-owned company in Guayaquil that smuggles shark fins. The company has long-standing relationships with freight handlers, enabling them to file sanitized export declarations with minimal inspection. Several containers traced by ELI contained over 800 kg of fins, valued at more than $300,000, despite being declared as "dry seafood scraps."

- **Ecuador - Fishing Ship Captains Smuggle Contraband:** The leader of network SA8, based in Ecuador and Peru, relies on smaller fishing companies to send small-sized, high-value commodities to East Asia via multiple boats. POI Sa35: *Small companies not very big. Big companies are too afraid to work with us. These companies normally have about 10 ships and each ship is not owned by one owner but a few who chip in*

Mexico City, sharing information about money laundering with ELI's investigators

Mexico, totoaba swim bladders filmed by ELI's investigators

to work together. Most are from Zhejiang. But the captain also has his own stuff to smuggle each time. How can a captain make money if he relies only [sic] his salary from the fishing company. They always smuggle.

- **Ecuador - Chinese Squid Fishing Fleets Smuggle Shark Fins to China:** A POI from network SA24 described how squid-fishing fleets on the Pacific Coast of South America transport shark fins to China ($20/kilo as of 2023) or hand them off to even larger ships on the open ocean. POI Sa162, a seafood trader: *We use a lot of seamen or fishermen to smuggle shark fins out to China and very risky. So, they all take cash in advance. We use all fishing boats to smuggle back and a lot of fishing boats here from Zhoushan and Shandong are fishing squirts here in the ocean and we use them to smuggle the fins back to China and these fishing boats also can take the fins and then pass them to some very big fishing boats to bring back to China in the open water*. One of this network's other POIs is the manager of a Chinese fishing logistics company operating in Lima and uses the company to smuggle fins, jaguar parts, and even antiquities to China.

- **Mexico - Airline Staff Bribed to Hide Totoaba on Commercial Flights:** Sources from the M3 network in Mexico detailed how bribed airline staff at major Mexican airports—particularly Mexico City International Airport—facilitated the transport of totoaba maws on commercial flights to the U.S. and Asia in both passenger luggage and air cargo. Suitcases were tagged by insiders and sometimes deliberately mislabelled to prevent them from being flagged for additional screening. and loaded without inspection.

- **Peru - Shipping Logistics Companies Conceal Illegal Wildlife Products:** ELI identified several Chinese shipping and logistics companies based in Lima and Callao as facilitators in wildlife crime in Peru. These companies own refrigerated containers, private warehouses, and shipping fleets that help smuggle illicit goods. POI Sa35 additionally described working with shipping agents who placed jaguar fangs and shark fins in tile shipments and dry goods containers headed to China. The agents were trained to avoid red flag routes, often rerouting through Ecuador and Chile when enforcement increased.

- **Suriname - Exporters Hide Illegal Wildlife Products in Timber and Seafood:** From at least the late 2010s, Chinese-operated companies in Suriname concealed jaguar parts and cocaine in container shipments of unrelated goods, altering shipping manifests to conceal their presence. ELI investigators identified traffickers who used contacts in timber businesses to transport jaguar bones and teeth hidden in logs. In another case, a shipping company operating between Paramaribo and Port of Spain accepted bribes to ignore jaguar parts disguised as seafood shipments. POI Sa10 described how a shipment disguised as frozen shrimp contained jaguar parts sealed in plastic. Dock employees in Suriname also accepted bribes to ensure the containers were loaded without inspection.

IV.

HOW CORRUPTION STRENGTHENS TCO IMPUNITY AND CRIME CONVERGENCE

As corruption allows criminal networks to operate and expand shielded from accountability, they grow in both economic and physical power, including over borders, while diversifying their revenue streams into multidimensional crime portfolios. In other words, corruption is fundamental to crime convergence. This diversification allows TCOs greater agility to respond to increased government pressure or new laws in specific sectors by re-prioritizing and focusing on profitability in lower-risk sectors. Corruption enables networks to become sufficiently strong and wealthy to expand their activities into Type II, Type III and Type IV crime convergence, as defined in ELI's 2023 Environmental Crime Convergence report, which articulated a four-type convergence paradigm.

Type III Convergence: ELI investigations in Latin America have shown significant participation in human smuggling by the same Chinese TCOs that drive environmental and wildlife crime in the region. The TCOs' relationships with immigration authorities allow them to participate in human smuggling and possibly trafficking, bring in their own cohort of peers from specific geographically-based networks, and aid fugitives from the law for a price.

- SA8, a shark fin trafficking network based in Peru and Ecuador, is also involved in human smuggling and via government connections, provides genuine Ecuadorian passports to fugitive Chinese businessmen and officials in South America. SA8 is allegedly able to provide these individuals with a new identity within 4 months, suggesting contacts within the Ministry of Foreign Affairs.

- POI Mx144 told ELI in 2024 that Chinese smugglers bribe Mexican authorities in exchange for permits allowing Chinese nationals to embark on planes to border cities, where other smuggling groups then facilitate their transportation to the U.S., potentially to involve migrants in the trafficking of other illegal goods. Mx144 stated that this service is offered at $7,000/person, including crossing the U.S. border. The same POI reported that each week more than 100 Chinese nationals travel by plane from Tuxtla to Tijuana without incident.

- According to POI Mx1, criminal networks' ability to obtain Mexican papers via bribes facilitated the onward movement of Chinese nationals into the U.S. Upon arrival of a plane, corrupt Mexican immigration officers escorted undocumented migrants through airport security, sometimes under the pretext of arrest, ensuring their safe arrival and transit through Mexico en route to the U.S. POI Mx1: *Our immigration friends at the airport would first pretend to arrest the Chinese smugglers and escort them into the office where the Chinese could secretly be allowed to sneak with us into some hotel in Mexico City…We would put them up in some safe hotel until their Chinese families pay off all the smuggling cost, then we will pay the cartel to help them cross the border.*

- One POI maintained agreements with officials in Mexico's immigration agency to fraudulently secure genuine residency cards for Chinese nationals. According to him, traffickers could obtain temporary or permanent residency cards in as little as one month. The temporary cards cost $6,000 per person, while the permanent cards, which require fabricated backstopping documents, cost $8,000. POI Mx14, an illegal seafood and drug trafficker working within network M2: *We can get them a real Mexican residency card, no problem. The temporary one is 100% legal. The permanent one, we just need to create a fake Mexican child as their sponsor. We take care of all the paperwork. It's gray and under the table. POI Mx147, a totoaba and marine products importer into the U.S. echoed this: Visas? Easy. Money talks. No one checks that too closely*.

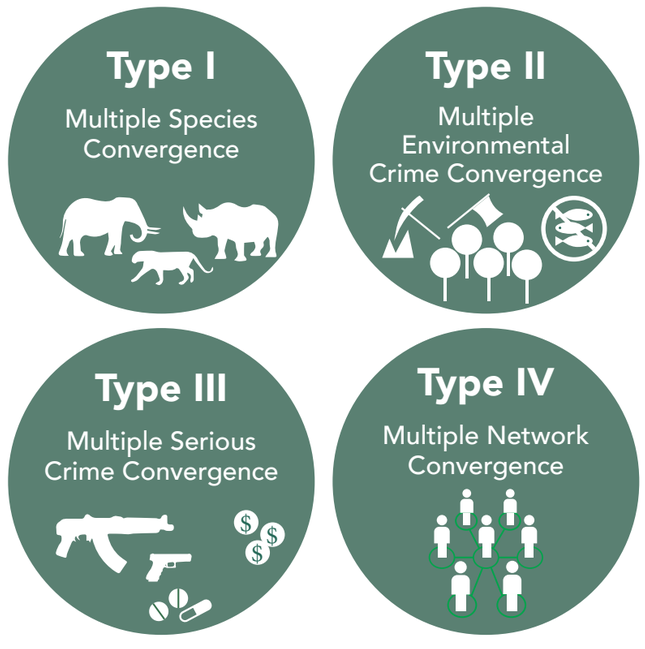
- POI Mx14's network purportedly also paid off officials at the Tijuana-San Diego border to allow Chinese migrants to enter the U.S. illegally. Some sources claimed to have bribed border officials to smuggle individuals in hidden compartments of vehicles crossing at Tijuana ($20,000-$30,000 per person). Other sources claimed to have paid U.S. officers to wave individuals through the pedestrian crossing.

Other examples of Type III convergence include using the same relationships to enable the movement of a variety of goods and people, with the relationships being a necessary component of well-worn logistics routes that see transit of drugs, arms, and people as well as illegal wildlife and environmental products.

- At the Chetumal border crossing between Belize and Mexico, relationships with specific personnel facilitated both the trafficking of flora and fauna used in TCM and human smuggling. The same logistics routes may also be used to facilitate multiple types of illicit trade.

- ELI's investigators found that some traffickers used the same jungle routes, clandestine airstrips, and maritime shipments for both jaguar parts and cocaine in Peru.

ELI'S CRIME CONVERGENCE TYPOLOGY FRAMEWORK



- Surinamese wildlife traffickers worked with the gemstone couriers of their Colombian contacts to disguise and move jaguar parts into East Asia.

Type IV Convergence: The growth and expansion of networks also result in what ELI's crime convergence model labels Type IV convergence: collaboration between TCOs. Unfortunately, Type IV convergence 'raises all boats' in a bad way: it allows for criminal alliances that take advantage of each others' strengths, connections, and territorial control. For example, wildlife traffickers investigated by ELI in Suriname maintained relationships with Brazilian groups such as the PCC and Venezuelan groups, leveraging their particular connections and abilities. One ELI POI described how good Venezuelan networks were at getting false export documentation: *POI Sa74: The Venezuelans are good at getting fake papers…we always use them when the paperwork gets tricky.*

The same Surinamese traffickers looked to Colombian contacts to improve their large-scale logistics and disguising techniques, given their long experience in finding ingenious ways to camouflage and conceal drug shipments. *POI Sa10: The Colombians know how to hide things in plain sight. They're the ones who showed us how to make jaguar bones look like carved trinkets.*

In Colombia, ELI investigated a Chinese network that had arrangements with non-demobilized armed groups to illegally mine in territory controlled by the groups, facilitated by bribes to local police. POI Sa180 served as an intermediary between Chinese investors who financed the mining equipment, non-demobilized FARC leaders, and law enforcement. More complex are the relationships between Chinese criminal networks in Mexico and Mexican cartels. As cartels have successfully sought to control both legitimate and illicit commodities in the country, they have inserted themselves into the illegal marine wildlife product supply chains formerly dominated by the Chinese groups. One of the effects of this, even when the new relationships forged have not been optional, has been to allow the Chinese groups to draw on cartels' connections to corrupt officials. ELI's sources have indicated that totoaba now travels along cartel-controlled routes. *POI Mx248: The cartels help us, we help them. No one touches our shipments unless we say so.*

Corruption tilts the playing field of justice by turning some officials or even agencies into additional arms of criminal networks, akin to painting a group of white chess pieces red and then commencing a match, giving the criminal side a decided advantage. TCOs are savvy about which officials they approach, assessing weaknesses such as debt or family ties that may make them more vulnerable to financial offers or threats. In Mexico, ELI sources provided information about how their networks assessed law enforcement for approachability during times of leadership changes. In Mozambique, low conviction rates–to which police informants' pay was linked–disincentivized them from sharing information on rhino horn and ivory poaching.

This collaboration in turn fosters intense distrust of government, and in places with systemic corruption and high levels of violence, only whistleblowers at peace with death will report or testify about witnessed wrongdoing, impeding the justice system and tilting the playing field even further. In Colombia, multiple sources complained of pervasive corruption in the Parques Naturales Nacionales (PNN) and the Corporación para el Desarrollo Sostenible del Norte y el Oriente Amazónico (CDA). While these agencies have reporting mechanisms for illicit activities, almost no one dares to use them for fear of leaks that will lead to violent repercussions.

V.

OFFICIALS WITH OUTSIZED IMPACTS ON TCO IMPUNITY

In addition to facilitating networks' expansion of revenue-earning activities and menacing honest citizens into silence, corruption allows impunity to commit auxiliary crimes, from money laundering to murder, that networks view as necessary to protect their enterprises. ELI's team heard stories of threats, retribution, and violence against honest officials, journalists, and civil society groups during fieldwork, sometimes from criminal sources who were matter-of-fact about retaliation.

Actors with law enforcement, judicial, and political power play significant roles in helping criminals avoid accountability and become stronger. ELI gathered specific examples of where these officials have thwarted investigations and raids, illegally released suspects and confiscated goods, and tampered with evidence and witnesses. In some cases, these officials abuse their authority to become directly involved in crimes.

LAW ENFORCEMENT OFFICERS

Corrupt law enforcement officers who leak information waste time and often-scarce resources, shred morale and team cohesion, and put their colleagues in danger. They snap ties between police and communities, resulting in less shared knowledge and the loss of public trust. They also hamper crucial interagency information sharing and operational coordination within and between countries. For example, in Colombia, sources told ELI that the General Prosecutor's Investigation Unit will not work with the Meta Departmental police force. ELI investigators have documented first- and secondhand evidence of law enforcement officers providing tip-offs in Bolivia, Ecuador, Guyana, Mexico. A leak by a single officer can undo months or even years of investigation and operational planning, and can result in loss of life when, for example, names of informants are leaked. This is especially true of places where information sharing among criminal communities is robust. ELI obtained access to warnings exchanged between Chinese wildlife traffickers in Bolivia, both peer-to-peer (example 1) and in astonishingly large groups (example 2), following a law enforcement operation triggered by ELI's investigations:

1. *Last time they didn't find anything in your place. This time make sure you don't leave any rattlesnakes pangolins or other wildlife in your place as the environmental NGOs will look for everything. This is very serious this time. The environmental group is checking hard now. Don't leave any endangering wildlife in your place. Otherwise, the cops will punish you hard on money, etc. You have to listen to me carefully.*

Even ELI's team was surprised by the size and extent of the warning system among Chinese wildlife traffickers in Bolivia. After a tipoff from a complicit police officer, a trafficker sent this message to *nearly 400* other wildlife traffickers in the country:

2. *Dear country fellas, in these coming few days, the police dpt, of Los Pozo (downtown district in SC) partnered with some animal protection NGOs and environmental*

groups have obtained the warranty from the courts and they are entitled to search the Chinese residential premises and restaurants (with the warrant). It is heard that some Chinese citizens are providing them the leads of wild animal species including crocodile skin belts, jaguar skins and fangs and claws and meat as well as bones to protected species. Anyone arrested with these products will be immediately prosecuted and processed by the courts to be sentenced. All Chinese fellow citizens should pay special attention to this as this op. is specially designed to target our Chinese and se we call all of you to be extra careful and don´t try to keep the old careless mentality. Also make sure you clear all photos of these products in your phones and laptops as this could rise the attention from the authorities including the police dept. This has also been a very focal issue for the Chinese embassy here as well as all Chinese business associations.

In addition to leaking information, compromised law enforcement officers provide hands-on protection of illicit cargo. They accept bribes to release detained traffickers, allowing them to continue plundering resources. Among ELI's findings regarding law enforcement bribes is that they are very much market-driven, and amounts are calibrated according to risk.

Cambodia, ivory tusks shown to ELI's investigators

- POI Sa68, the head of a Chinese wildlife trafficking network in Bolivia linked to the Fujian mafia explained that bribe amounts to police had increased fivefold due to increased enforcement, rising from $200 to $1000.

- After a record interdiction of shark fins in Hong Kong in spring 2020[1], an ELI POI noted how the perceived added risk resulted in increased bribe amounts. POI 5: *After the big seizure in Hong Kong, everyone is nervous. The police here ask for more money now. The price to move things is higher. But nothing really changes. We find new ways, and we keep going.*

- In Mexico, ELI investigators have repeatedly witnessed tip-offs from corrupt law enforcement or military officers who gave marine wildlife traffickers warnings before raids or the setup of checkpoints. In Guyana, a trafficker connected to Network SA1 revealed that police officers there also take bribes to warn traffickers of upcoming raids or divert investigations away from key export locations. These officers ensure that traffickers can continue operations unhindered, making Guyana one of the safest places in the region to move illegal wildlife products.

- An ELI POI in Vietnam discussed a friend who went on the run after being caught with two tons of ivory. Though the suspect was caught and arrested after a two week effort, he only remained in prison for two days before a bribe of 4 million RMB (approximately $500,000) secured his freedom. The POI reported that the sentence for that quantity of ivory should have been 7 years of jail time.

- In Cambodia, POI Cam 3, the owner of a shop dealing in illegal wildlife products avoided arrest via a $3000 bribe after his business was raided, allowing him to simply move his sales to online platforms when the physical shop closed.

THE JUSTICE SYSTEM: PROSECUTORS, JUDGES, AND COURT EMPLOYEES

Prosecutors, judges, and others within the court system are also susceptible to bribes (and threats) that result in miscarriages of justice. Sometimes cases are dismissed outright, while in more subtle instances, witnesses or evidence are tampered with to bias outcomes while maintaining the appearance of a fair process. Just as harmful, pervasive judicial corruption has deterred rangers and police from doing their jobs in places like Nigeria, where released suspects target those who arrested them for retaliation, with high impunity rates.[2]

- In one high-profile case in 2018, an investigative unit prepared what they believed to be an airtight case against a major trafficker linked to the smuggling of over 100 kilograms of totoaba maws. However, the case was suddenly dismissed, according to an ELI source, because the presiding judge received a $200k bribe. This allowed the trafficker to flee the jurisdiction, avoiding legal repercussions altogether.

- Prosecutors in Baja California allegedly suppressed key witness testimonies in exchange for payments from a cartel-linked network. As a result, numerous criminal cases linked to totoaba smuggling were abandoned or significantly weakened before reaching trial.

- Suspicions were raised in a 2015 South African case in which a police intelligence officer had stolen rhino horns at gunpoint from two peers working undercover on a sting operation. He was acquitted by a Magistrate in the Mtubatuba Magistrate's Court, despite the fact that the plaintiffs and witnesses were fellow law enforcement officers.

- A Fujianese TCM trader in Europe, POI Eu10, claimed in the early 2020s to source tiger bones from judges in Northeast China, suggesting the possible release of seized evidence back into illicit markets. Once in Europe, the bones were used to make tiger bone wine.

ELECTED OFFICIALS

Corruption that buys elected officials is often accomplished by donating to political campaigns.[3] Increased wealth is re-invested into bribing more officials, creating a cyclical effect where bought officials provide ever-greater protection for criminal networks, allowing them to grow their revenue streams without interference and expand their influence. Political enablers offer criminals protection and interfere with bureaucratic processes and law enforcement efforts. POIs in Peru, Mexico, Suriname, Panama and Costa Rica told ELI's investigators about the protection they had from elected officials in exchange for campaign donations. In countries where corruption is the most pervasive, such as Venezuela and Suriname, ELI sources claim that it reaches heads of state and their families.

- Leaders of the SA1 network maintained relationships with former Surinamese President Dési Bouterse's brother and his son Dino, according to ELI sources. Despite Dino Bouterse's extradition and conviction in the U.S. for narcotrafficking and terrorist facilitation, ELI's intelligence revealed that his support allowed SA1 traffickers to operate unimpeded in key transit areas. An informant told an ELI investigator in 2018 that the President's brother directly protected Chinese traffickers of shark fins and jaguar parts, suppressing investigations and helping make Suriname an export hub for protected species from Latin America. Criminal groups reportedly provided bribes via political campaigns. This form of influence further embedded corruption at the highest levels of Surinamese politics. A manager at a Chinese infrastructure company affirmed to an ELI investigator that bribes are the key to finalizing any deal in Suriname.

- In Operation Fake Gold, ELI's investigators heard sources speak about a former mayor of Tijuana, with one going so far as to claim that the mayor laundered money for one of ELI's POIs. The former mayor's influence allegedly shielded the POI from prosecution, despite a federal arrest warrant for her for wildlife trafficking. The allegation is not an isolated example. Marine wildlife traffickers in Mexico have influenced local mayors in high-risk fishing zones, offering political donations and other incentives in exchange for turning a blind eye to illicit activities. In some cases, local politicians have even assisted in coordinating law enforcement slowdowns when traffickers face police scrutiny.

- Traditional or Indigenous authorities are unfortunately sometimes implicated in illicit trade as well, adding jurisdictional difficulties to investigations and operations. In South Africa, one ELI wildlife trafficking POI was a senior member of the Tembe royal family of the KwaZulu-Natal part of South Africa and Mozambique.

1 Alberts, E.C. (2020, May 7). *Authorities seize record 26 tons of illegal shark fins in Hong Kong*. Mongabay. https://news.mongabay.com/2020/05/authorities-seize-record-26-tons-of-illegal-shark-fins-in-hong-kong/

2 Ekott, I. (2022, March 4). *Investigation: Inside Nigeria's shocking wildlife crimes and how culprits escape justice*. Premium Times. https://www.premiumtimesng.com/news/headlines/515061-investigation-inside-nigerias-shocking-wildlife-crimes-and-how-culprits- escape-justice.html

3 Amerhauser, K. (2024, March 14). *On the line: Can exposure reporting disrupt organized environmental crime?* Global Initiative. https://globalinitiative.net/analysis/exposure-reporting-environmental-crime-disruption/

VI.

BLURRED LINES BETWEEN CHINESE OFFICIALS, ASSOCIATIONS, AND CRIMINAL NETWORKS

ELI's investigations uncovered a number of examples in which employees or associates of the Chinese government–the diplomatic community, state-owned companies, and official business or cultural associations–were complicit in bribing officials abroad in furtherance of environmental crime and for the awarding of infrastructure contracts. In some cases, these parties used members of criminal networks as their intermediaries, according to ELI sources. Sources also reported that Chinese nationals working for the government or state-owned companies abroad abused their positions and access to become involved in the illegal wildlife trade, not only as consumers or small-scale smugglers, but as instigators and advisors.

CHINESE COMPANIES

Countries vary in their attitudes toward corruption committed by their nationals abroad. China has traditionally been tolerant of bribery committed by its nationals and entities overseas, with its companies, including state-owned enterprises, generally avoiding sanction for obtaining contracts and permits via payoffs. The problem may be deeper than mere tolerance. ELI's investigations uncovered some indicators of Chinese criminal networks in Latin America being used as middlemen to deliver bribes from state-owned enterprises to local officials. In addition, ELI sources in multiple countries claimed that Chinese companies' employees participate in both the illegal wildlife trade and the corruption that facilitates it.

- In Bolivia and Colombia, ELI confirmed that middlemen close to high-level officials and business titans facilitated the payment of bribes for Chinese companies to receive permits for logging, mining, and building and infrastructure contracts. In Bolivia, network SA4 assisted Chinese state-owned companies in securing major procurement contracts for managing mining sites and roads. The companies obscured bribes as "service fees" for middlemen, masking them as consultants. In addition, ELI spoke with a money launderer who explained how he helped companies–including state-owned companies–circumvent China's currency export controls to provide the cash for bribes via underground banking systems known as feiquian, or "flying money".

- A shark fin seller in Peru in 2023 noted: *a lot of Chinese state-owned enterprises buy the fins from me and then send to China by the sailors or fishermen… They can bring a lot back to China like huge boxes. Normally they charge USD2000 to 3000 for helping to smuggle this stuff to China*.

- The leader of the SA1 network in Suriname stated that his shark fin supplies were sourced from Chinese state-owned companies operating Venezuela-flagged vessels in Venezuela and the Caribbean. He claimed that in early 2021, the companies were landing 30 to 50 tons of fins per month, killing approximately 37,000 sharks. Given that ELI's information at the time indicated that the SA1 and SA2 networks sold 1-2 tons of shark fins per

month, we assess that these Chinese-owned boats are the source for multiple other fin trafficking networks operating in or sourcing from South America.

- In Cambodia, ELI's main two POIs affirmed that much of their clientele was visiting Chinese nationals. POI Cam 2, an illegal wildlife trader who has a sales network that stretches through Cambodia, Laos, Thailand and Vietnam and includes multiple front businesses: *A big Chinese group came to my new house to buy the stuff and they love ivory, rhino and also tiger stuff and they love it but their only concern is how to bring these safe to China as they all work for the Chinese government or state-owned enterprises. We help them to smuggle into China after they pay the money here… They will choose and pay and we then help them to smuggle into China. They don't need to bring most of these products back to China by themselves.*

CULTURAL AND BUSINESS ASSOCIATIONS

Chinese cultural and business associations abroad sometimes provide connections between criminal networks and government officials. ELI's findings in this area are supported by the work of respected investigative outlets such as ProPublica[1]. GI-TOC has raised questions about whether China's lack of appetite for anti-TOC work is correlated with a perception that certain activities or networks further the state's interests.[2]

- A POI from the SA3 network based in Colombia implicated a leader of the Chinese Cantonese Wuyi Club Association, saying that the person could work with wildlife traffickers if he thought there would be a good profit, and simultaneously stressing the close ties between the Association and the Chinese government and the person's ability to "protect" shipments.

THE DIPLOMATIC COMMUNITY

Ties between criminal networks and Chinese officials sometimes include members of the diplomatic community. ELI's investigations uncovered connections between Chinese wildlife trafficking networks in Latin America and Chinese embassy employees in Colombia, Mexico, Peru, Suriname and Venezuela. ELI's sources directly implicated Chinese diplomats in actively guiding and facilitating the wildlife trade, acting as enablers ensuring the existence of suppliers who in return received protection and logistical support. At least one South American wildlife trafficking network maintained relationships with complicit embassy officials in multiple countries simultaneously, showcasing diplomats' role as enablers in the region.

- The SA3 network maintained relationships with high-level Chinese Embassy officials in Colombia to coordinate shipments and reduce the risk of seizure. POI Sa15 confirmed that these connections played a crucial role in ensuring their shipments avoided law enforcement intervention.

- A source in Mexico claimed that a Chinese diplomatic vehicle was used to smuggle sea cucumber and totoaba over the U.S. border after bribing a consular officer in Tijuana. POI Mx14: *She had a car with diplomatic plates. That's why no one checked her, not in Mexico, not in the U.S. The consulate was part of the business.* Eventually, the U.S. Border Patrol flagged and searched the vehicle, resulting in the seizure of sea cucumbers and the revocation of the POI's visa.

- ELI obtained recordings of Chinese diplomatic staff in Peru ordering jaguar bone wine and tiger products. Some items were given as "gifts" to Chinese embassy personnel in exchange for protection and facilitation. A source reported that Embassy officials provided cover for shipments and advised on routes to avoid detection.

Peru, jaguar fangs offered to ELI's investigators

- POI Sa35, who is the leader of network SA8, described how the Chinese embassy in Peru recruited him into the smuggling business, ensuring that he would act as a front person for illicit trade while the embassy remained in the background: POI Sa35: *You know why I can get into this (smuggling) business from doing my restaurant at the first place? It's all attributed to Chinese embassy here as they asked me to get into this business as they need someone to be on the front. At that time, I had no knowledge of any trade. So how can I get into this business then and become a professional now? Because some friend in the Chinese embassy told me that some local stuff is highly demanded in China. They asked me to take care of pipelining this stuff in any way to China. They can't show their face for their status and they need me to do this job for them.*

- POI Sa35 went on to explain how Embassy personnel were key conduits of information regarding which illicit commodities officials in China wished to source. POI 35: *This business really depends on the insights of what stuff needed in China. It's totally beyond my capabilities to know all these business insights. For example, who or which company needs sea foods? Which person in China needs some wild animals? Who needs very rare treasure or specialty? Every government leader has special tastes for these stuffs [sic] and I am the person here to source all these rare stuff for the Chinese boss or leaders. These people will tell me exactly what stuff to source here. The leaders don't like cash, but they prefer these rarities.*

- Chinese Embassy officials in Suriname allegedly provided cover for trafficking routes that moved jaguar parts, shark fins, and other contraband. These officials assisted in establishing trade connections, advising traffickers on effective supply chains, and in some cases directly influencing government inspections to protect these illegal trades.

The use of criminal organizations by governments or government officials is particularly troubling because the resources and clout of a state can be brought to bear on a vulnerable country while it maintains plausible deniability for these ties. This is especially true of China, which has made large infrastructure and other investments throughout Latin America, Africa, and Southeast Asia, and has not been afraid to use funding as leverage to extract concessions. For example, when concessions made to Cosco for administering Chancay port in Peru were found to violate national law, the legislature changed the law amid a hardball response from Beijing. It should be noted that many China-funded or build infrastructure projects are along already-problematic routes for illegal wildlife products. In addition to Chancay port, for example, in late 2024 plans were announced that a bridge over the Corentyne river, which divides Guyana and Suriname and is a favored crossing for wildlife traffickers, would be built as part of the BRI.[3]

The Chinese government's track record pertaining to cooperation against wildlife and natural resource crimes overseas, including instances of bribery, is mostly unencouraging. The country does not have exact equivalents of the U.S. Lacey Act or the FCPA, though it does have a provision against bribing foreign officials,[4] and often refuses to assist in cases involving its nationals even when the country in which the crime occurred formally requests assistance via MLATs or other official channels. However, in a few instances, it has collaborated effectively with foreign governments to remove its nationals committing crimes abroad,[5] [6] though tracking judicial outcomes once the individuals are sent back to the mainland is difficult.

As China invokes a policy of non-intervention in other countries as its reason to not collaborate on environmental crime and corruption cases involving its nationals abroad, it is reasonable to note that the state, including state-owned enterprises, intervenes or allows interference abroad in myriad ways.

First, accepting or condoning bribery and other actions meant to evade transparent, competitive bid processes or due diligence for contracts–often legally required specifically to avoid bribery– thwart countries' internal rule of law and in many cases, deprive them of tax revenue.[7] [8] [9] Second, illicit campaign donations from foreign nationals meant to curry favor or gain advantages run afoul of campaign laws in multiple countries. Third, the leveraging of investment and aid to apply pressure on unrelated matters, such as diplomatic recognition of Taiwan,[10] is a form of interference with sovereign foreign policy decisionmaking. Fourth, clandestine Chinese police stations identified around the world commit actions that violate the rights of the diaspora abroad, such as free speech.[11] [12] Fifth, China has leveraged its economic clout to gain control of key infrastructure such as ports abroad. As noted, when state-owned enterprise COSCO's contract to exclusively operate the Port of Chancay in Peru was found to be unconstitutional, Chinese investors pressured Peruvian officials until they passed a legislative amendment. Therefore, it is reasonable to question the credulity of refusals to cooperate on issues of environmental and other crimes and related bribery, given that non-interference is very selectively applied.

China's central government has shown greater political will to address environmental crime and corruption domestically. Many ELI POIs carefully avoided directly shipping or flying specific prohibited commodities to the mainland, or stressed that it is risky and expensive. Similarly, shark fin sellers in Hong Kong told ELI investigators in late 2023 that they could export to Taiwan but not to mainland China. However, there is evidence of corruption thwarting environmental crime enforcement on the mainland as well.

- POI 15: *The China Customs and shipping agents in Guangzhou Huangpu port stole a lot of timbers from me and each time they would steal 8 or 10 logs from each container I sent from here to China. I almost lost a container of timber each year in total. They stole a lot of timbers from so many Chinese traders like me. But we can't speak it out as this is a shady business*.

- POI Sa74 revealed that traffickers frequently gifted jaguar teeth, gold jewelry, and other valuable items to influential Chinese government officials in Fujian, openly acknowledging that products were preferred to avoid the risk of detection and scrutiny that would come with cash. These strategic gifts ensured criminal networks gained valuable business privileges, including access to preferential import/export policies, favorable business licenses, and immunity from scrutiny by law enforcement agencies. POI Sa5B: *I gave most of my smuggled teeth to Chinese government officials like mayor and party secretary in Fujian and their secretaries. They love this*.

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VII.

INTERNATIONAL ANTI-CORRUPTION FRAMEWORKS

The effectiveness of ELI's work often hinges not only on exposing corruption but on understanding the broader system that either confronts it or enables it. Corruption is embedded in supply chains that stretch across continents and protected by criminal and political networks. Without meaningful deterrence at many national levels, international anti-corruption frameworks offer one of the only structural counterweights to the global impunity corrupt actors enjoy.

This section outlines the principal international legal frameworks and agreements that govern global anti-corruption efforts and define what constitutes a criminal offense; they shape how countries are expected to cooperate across borders; and they often expose the gaps between stated policy and actual enforcement–gaps that are exploited by the networks ELI investigates. Understanding these frameworks is essential to identifying legal levers that can be used in support of enforcement. It also helps us understand where systems are failing and why. What follows is not an exhaustive legal analysis but rather a field-forward synthesis of key international anti-corruption instruments that intersect with environmental crime, illicit finance, and the enablers who make both possible.

International Laws

Corruption is not confined to national borders and neither are the tools designed to combat it. A body of international legal instruments now exists to establish shared definitions of corruption, criminalize core offenses, and promote cooperation across jurisdictions. These treaties and conventions offer the legal architecture that enables governments to prosecute cross-border bribery, recover stolen assets, and hold both individuals and corporations accountable. For ELI, understanding these instruments is essential: they provide not only the legal context in which corruption persists but also the tools for disrupting it. This section outlines the primary legally binding international laws that shape global anti-corruption efforts and frame how states can confront impunity through formal legal channels.

United Nations Convention against Corruption (UNCAC)

The United Nations Convention against Corruption (UNCAC) is the most comprehensive and universally accepted international legal instrument dedicated to addressing corruption in all its forms. Adopted by the UN General Assembly in October 2003 (Resolution 58/4) and entering into force in December 2005, UNCAC has been ratified by 191 countries, making it the only global anti-corruption treaty with near-universal participation.[1]

It is a legally binding instrument that obliges state parties to adopt measures across various areas. Its comprehensive framework is structured around five key chapters (Chapters II - VI), each addressing a core area of anti-corruption action: Preventative Measures, Criminalization and Law Enforcement, International Cooperation, Asset Recovery, and Technical Assistance and Information Exchange.[2]

Chapter II calls for state parties to implement effective anti-corruption policies that promote the rule of law, integrity, transparency, and accountability. Chapter III requires countries to criminalize a wide array of corrupt conduct, including bribery of national and foreign public officials, embezzlement, trading in influence, abuse of functions, illicit enrichment, obstruction of justice, and money laundering tied to corruption. Chapter IV establishes an international framework for extradition, mutual legal assistance, and joint investigations, enabling law enforcement agencies in different jurisdictions to pursue corrupt actors and recover stolen funds. Chapter V obligates states to return assets obtained through corruption, particularly when involving public officials. Chapter VI calls for international support through training, capacity building, and resource mobilization.

Overall, UNCAC serves not only as a legal foundation for national anti-corruption laws but also as a benchmark against which countries' performance can be measured. For ELI, UNCAC provides critical context for understanding where corruption is criminalized and enforceable, how information can be shared across borders, and what obligations states have–and where they fall short.[3] All 22 countries examined in this report have ratified UNCAC.[4]

Although enforcement is uneven and political will varies, UNCAC remains a norm-setting and diplomatic tool. In jurisdictions where domestic corruption enforcement is weak or compromised, UNCAC's framework offers avenues for international pressure, advocacy, and legal engagement–particularly when investigating corrupt actors tied to environmental crime.[5]

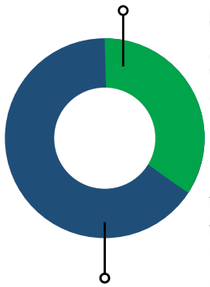
OECD Anti-Bribery Convention

The OECD Anti-Bribery Convention is a legally binding treaty that targets the bribery of foreign public officials by companies and individuals seeking international business advantages. Entering into force in 1999, it was the first international agreement to criminalize the "supply side" of transnational bribery, obligating states to prosecute those who offer bribes–not just those who accept them. As of 2024, the Convention has 46 parties.[6] Only 8 of the 22 countries examined in this report are parties to the OECD Anti-Bribery Convention, including Colombia, Costa Rica, Mexico, Peru, Belgium, Hungary, Italy, the Netherlands, Poland, and South Africa.

The Convention targets international business transactions, requiring signatories to criminalize the act of offering value to foreign public officials to gain business advantages, and to hold both individuals and companies liable.[7] It obligates states to impose strong penalties and prohibits signatories from declining prosecution based on economic interests, diplomatic concerns, or the identity of the accused. Compliance is overseen by the OECD Working Group on Bribery through a public, peer-reviewed process that led many countries to strengthen laws and enforcement. By placing legal obligations on countries that host major multinationals, the Convention reinforces global accountability and remains a key tool against corporate corruption.[8]

For ELI, the OECD Anti-Bribery Convention holds particular relevance. Many of the companies involved in sectors that intersect with environmental crime–such as timber, mining,

Scope and Reach of OECD Anti-Bribery Convetion countries that are parties and key regions that are not party to the convention (China, India, most of Africa)



fisheries, and infrastructure–are based in or conduct business through OECD Convention countries. This means that bribery used to secure extraction rights, cover up illegal harvesting, or avoid inspections may constitute a prosecutable offense in the company's home country, even if the act occurs entirely abroad. By collecting actionable intelligence on such cases and understanding how these legal frameworks operate, ELI can support enforcement pathways in jurisdictions that have both the legal mandate and political capacity to act.

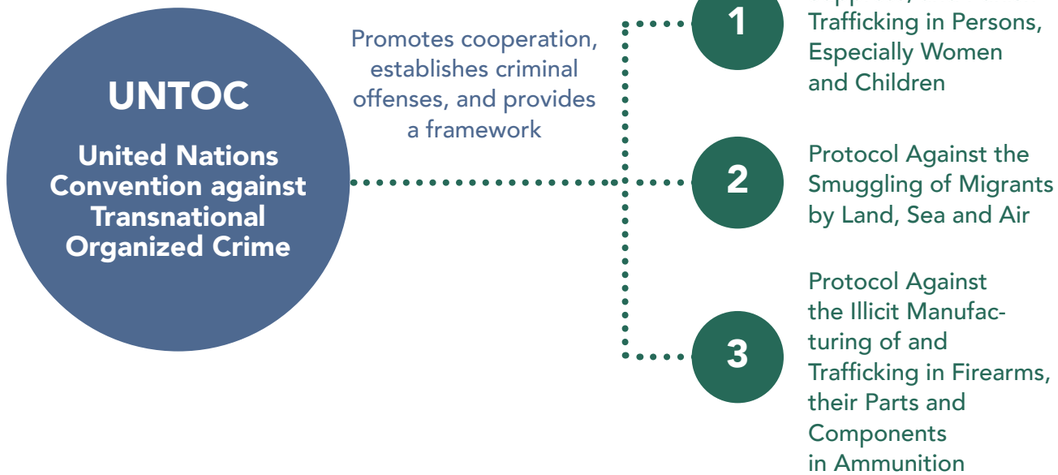
UN Convention against Transnational Organized Crime (UNTOC)

The United Nations Convention against Transnational Organized Crime (UNTOC) is the primary legally binding international instrument aimed at combating transnational organized crime in all its forms. Adopted by the UN General Assembly in 2000 and entering into force in 2003, UNTOC provides a global legal framework for defining, investigating, prosecuting, and cooperating across borders to dismantle criminal networks that operate transnationally.

As of 2024, 191 countries have ratified or acceded to UNTOC, making it nearly universal in scope. Only Iran (signatory but not ratified), Papua New Guinea, Palau, and South Sudan remain outside the treaty.[9] The Convention requires each state party to criminalize participation in organized criminal groups, establish provisions for international cooperation, and adopt legislation to allow extradition, mutual legal assistance, and law enforcement collaboration.

UNTOC is especially relevant to ELI's investigative work because it creates the legal infrastructure for cross-border enforcement against criminal networks involved in environmental and wildlife crime–activities which often involve trafficking, financial crime, and corrupt officials. While environmental crimes are not explicitly named in the Convention, many of their enabling factors–such as money laundering, document fraud, smuggling, and organized conspiracy–fall squarely within its scope.

While challenges remain–especially in political will and enforcement capacity–UNTOC remains one of the core legal pillars of the international response to organized crime. For



organizations like ELI, it provides a framework for framing investigations, cooperating with international partners, and potentially identifying legal entry points in states that have committed themselves to acting against transnational criminal networks.

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

CITES is one of the most widely adopted international legal instruments governing wildlife trade. Established in 1973 and entering into force in 1975, CITES is designed to ensure that international trade in wild animals and plants does not threaten their survival. As of 2024, it has 184 member states, including all of the countries addressed in this report.[10]

Rather than criminalizing conduct directly, CITES provides a permitting framework that national governments are required to implement through domestic legislation. Species are classified into three appendices based on the level of threat posed by trade. Appendix I includes species threatened with extinction and generally prohibits commercial international trade in specimens. Appendix II covers species which are not yet endangered but may become so without trade controls. Appendix III includes species that are protected in at least one country and for which international cooperation is needed to manage their trade.[11] To comply with CITES, countries must establish designated national authorities, maintain permit systems, and implement border controls to manage and monitor the legal trade in wildlife and wildlife products.

Although CITES includes compliance mechanisms–such as country-level evaluations and the possibility of trade suspensions–these processes are generally slow-moving and dependent on political will. CITES has no enforcement power of its own; it depends on states to criminalize violations and prosecute offenders through domestic systems. In many of the countries where ELI operates, these systems are either severely under-resourced or compromised by the same corruption that facilitates the crimes in question. As a result, CITES violations are rarely prosecuted, and when they are, penalties tend to be minimal compared to the profits involved.

For ELI, CITES serves as both a legal foundation and a recurring vulnerability. It provides a framework through which permit fraud, document forgery, and regulatory abuse can be identified and challenged. Permit records, shipping manifests, and export authorizations are valuable data points in mapping networks and identifying trafficking corridors. At the same time, CITES-authorized systems are frequently exploited by traffickers with access to corrupt officials. Understanding where, how, and by whom systems are compromised is essential to disrupting supply chains and identifying officials and facilitators who enable crime to flourish.

Overview of Regional and National Anti-Corruption Laws

While international treaties set the stage, the actual enforcement of anti-corruption laws occurs at the national and regional levels–and this is where the disparity between rhetoric and reality is often most visible. Across regions, countries have adopted a patchwork of anti-corruption laws, specialized agencies, and enforcement strategies. Some legal frameworks are robust on paper but selectively applied. Others are undercut by political interference, weak judicial systems, or systemic complicity. For ELI, the relevance of these national frameworks lies in understanding where enforcement is possible, where it is performative, and where corruption is effectively decriminalized through inaction.

UK Bribery Act

The UK Bribery Act 2010 is one of the most far-reaching anti-corruption laws, notable for its broad scope and extraterritorial reach.[12] It replaced outdated bribery laws with a single legal framework that criminalizes four key offenses: offering or receiving bribes, bribing foreign public officials, and corporate failure to prevent bribery.[13] The inclusion of strict liability for companies under Section 7–unless they can prove "adequate procedures" to prevent bribery–was a major innovation.[14] The Act applies to any individual or company with a UK connection, including non-UK entities conducting any business in the UK, allowing British authorities to prosecute foreign bribery with even minimal UK ties.[15]

The Act prohibits facilitation payments and places strict expectations on hospitality and promotional spending, setting a zero-tolerance tone.[16] Enforcement is led by the Serious Fraud Office and Crown Prosecution Service, which has pursued high-profile cases and deferred prosecution agreements with global firms.[17] [18] The Bribery Act presents a valuable legal tool, especially in cases involving UK-linked companies engaged in illegal wildlife trade, logging, or mining. Despite challenges in enforcement capacity, the Act remains a powerful mechanism for holding corporations accountable for corruption in complex transnational supply chains.

U.S. Foreign Corrupt Practices Act (FCPA)

The Foreign Corrupt Practices Act (FCPA), enacted in 1977, is a key U.S. anti-corruption law that prohibits the bribery of foreign officials and requires public companies to maintain records and internal controls.[19] Its extraterritorial reach allows the U.S. government to prosecute bribery cases involving U.S. individuals, companies, and foreign firms with U.S. ties, even when the corrupt acts occur entirely abroad.[20] Enforcement by the Department of Justice (DOJ) and the Securities and Exchange Commission (SEC) has resulted in billions of dollars in penalties, with recent cases targeting bribery in the extractives, medical, and infrastructure sectors.[21] However, in February 2025, the Trump Administration issued an executive order pausing FCPA enforcement for 180 days, citing concerns about economic competitiveness.[22] The move triggered a sharp reduction in DOJ enforcement resources and drew widespread criticism for legal experts, compliance officers, and business leaders.[23] Nonetheless, the law remains on the books, and its statute of limitations exceeds political terms, meaning that temporary non-enforcement should not induce companies to be tempted to flout the law under an assumption of lack of accountability.

For ELI, the FCPA has long served as a critical tool for addressing corruption linked to environmental and wildlife crime. Many companies involved in extractives, shipping, and supply chain management have ties to the U.S. or use financial systems under U.S. jurisdiction. In these contexts, FCPA enforcement has offered a way to hold individuals and corporations accountable for bribery that enables illegal deforestation, mining, wildlife trade, and land grabbing. Guidance issued after the enforcement pause prioritizes AML efforts and combatting TCOs, underscoring the need to clearly show how environmental and wildlife crime are inextricably linked to both.

U.S. Foreign Extortion Prevention Act (FEPA)

The Foreign Extortion and Prevention Act (FEPA), enacted in late 2023 as part of the National Defense Authorization Act, fills a critical gap left by the FCPA by criminalizing the demand side of bribery. While the FCPA targets bribe-payers, FEPA enables the prosecution of corrupt foreign officials who solicit or accept bribes from U.S. individuals or companies. It broadens the definition of "foreign official" and mirrors the FCPA's extraterritorial reach, allowing enforcement when there is a U.S. nexus.[24] Violations carry serious penalties, including up to 15 years in prison and fines of up to $250,000 or three times the bribe's value.[25] Although enforcement may be limited by sovereign immunity and extradition challenges, the DOJ can still leverage public indictments, asset seizures, and travel bans to deter foreign corrupt actors.[26]

In July 2024, Congress refined FEPA through technical corrections that clarified its jurisdictional scope, narrowed the definition of foreign official to align with the FCPA, and emphasized the requirement of corrupt intent.[27] [28] Legal experts consider FEPA a major evolution in U.S. anti-corruption law–arguably the most significant since the FCPA itself–and a critical complement to existing enforcement tools.[29] Organizations engaging with foreign officials are now expected to integrate FEPA compliance into their anti-bribery programs. Importantly, FEPA remains in force even during the current suspension of FCPA enforcement, offering civil society and investigators like ELI a continued avenue for accountability in global corruption cases.

African Union Convention on Preventing and Combating Corruption (AUCPCC)

The African Union Convention on Preventing and Combating Corruption (AUCPCC), adopted in 2003 and in force since 2006, is the continent's most comprehensive anti-corruption treaty. It addresses a wide range of offenses, including bribery, illicit enrichment, money laundering, and abuse of office, and mandates national anti-corruption bodies, public sector transparency, and ethics education.[30] The AUCPCC sets itself apart from other global frameworks by explicitly requiring states to criminalize private sector corruption and regulate political party funding.[31] The African Union Advisory Board on Corruption (AUABC) was created to support implementation, advise member states, and monitor compliance.[32]

As of early 2024, 48 of 55 AU states have ratified the treaty, but enforcement remains uneven due to political resistance, weak institutions, and inconsistent legal harmonization.[33] While the Convention provides a strong legal foundation, critics point to gaps between commitment and implementation, and warn that anti-corruption drives can sometimes erode due process.[34] For organizations like ELI, the AUCPCC offers a valuable legal framework in African countries where environmental crimes intersect with corruption. Its emphasis on cross-border cooperation, private sector accountability, and asset recovery aligns closely with ELI's mission to combat transnational environmental crime and promote the rule of law across the continent.

Inter-American Convention Against Corruption (IACAC)

The Inter-American Convention Against Corruption (IACAC), adopted in 1996 and in force since 1997, was the world's first binding international anti-corruption treaty. Developed by the Organization of American States (OAS), it reflects a hemispheric commitment to countering corruption as a threat to democracy, development, and public trust.[35] The Convention outlines a broad framework for both prevention and enforcement, calling on states to adopt measures such as codes of conduct, asset declaration systems, whistleblower protections, and civil society participation.[36] It also obligates parties to criminalize transnational bribery and illicit enrichment and to enable asset tracing, freezing and forfeiture–predating similar global treaties like the OECD Anti-Bribery Convention and UNCAC.[37]

To promote accountability, the OAS established a peer-reviewed body in 2002–the Mechanism for Follow-Up on the Implementation of the Inter-American Convention Against Corruption (MESICIC)--which assesses how states fulfill their obligations through country reviews and public recommendations.[38] The IACAC also facilitates international cooperation on investigations, prosecutions, and extraditions, supporting efforts to dismantle corruption networks that span borders. For organizations like ELI, the Convention provides a legal foundation for addressing cross-border corruption tied to environmental crime, especially in regions where public and private actors exploit weak oversight and where regional collaboration is essential for enforcement.

Council of Europe Criminal and Civil Law Conventions on Corruption

The Council of Europe's Criminal and Civil Law Conventions on Corruption, adopted separately in 1999, together form one of the most comprehensive regional legal frameworks for combating corruption. The Criminal Law Convention obliges parties to criminalize a broad range of corrupt practices–including active and passive bribery involving domestic and foreign officials, trading in influence, private sector bribery, money laundering, and accounting offenses–and establishes standards for international cooperation, mutual legal assistance, and extradition.[39] It is notable for its expansive scope, covering public international organizations and judicial bodies, and for promoting harmonization of national laws across Europe.[40]

The Civil Law Convention complements this by making corruption a civilly accountable offense, requiring states to allow individuals and legal entities to seek compensation, annul corrupt contracts, and protect whistleblowers.[41] Both Conventions are monitored by the Group of States against Corruption (GRECO), whose non-binding but politically influential assessments drive legal reform and promote implementation across the region.[42]

Together, these instruments address corruption from both punitive and remedial angles, enabling criminal accountability while also empowering victims of corruption–including businesses, civil society, and individuals–to seek redress through civil courts. Their combined emphasis on transparency, enforcement, victim compensation, and whistleblower protection offers a powerful legal foundation for addressing the full lifecycle of corruption. For ELI, the Conventions provide critical tools for tackling environmental crime enabled by corruption–whether through prosecution of bribe-taking officials, recovering of illicit gains, or litigation by affected communities. They also facilitate cross-border cooperation, particularly in cases involving multinational enterprises or transnational environmental harm, reinforcing a holistic, rights-based approach to anti-corruption enforcement in Europe.

International Agreements

Not all anti-corruption commitments come in the form of binding treaties. Around them exists a dense layer of non-binding international agreements, voluntary frameworks, and political declarations that shape how governments, institutions, and corporations confront corruption. These instruments–such as the G20 Anti-Corruption Action Plan–don't carry the force of law, but they exert powerful normative pressure. They often set standards that are later codified or act as gateways to cooperation, funding, or trade. For ELI, they signal where momentum is building and where pressure can be applied to push for enforcement or reform, especially in countries where political will is uneven.

Recent Global Anti-Corruption Trends

Over the past several years, the global landscape of anti-corruption efforts has undergone significant changes–some encouraging, many deeply concerning. From data-driven enforcement to deteriorating institutional safeguards, emerging trends offer a complex view of where the global fight against corruption stands.

One of the most alarming developments is the worsening of global impunity for corruption. According to Transparency International's 2023 Corruption Perceptions Index (CPI), more than 80% of the world's population lives in countries where anti-corruption performance is either stagnant or worsening. A key contributor to this trend is the erosion of judicial independence and the politicization of anti-corruption agencies, particularly in countries that had previously shown promise. In Indonesia, for example, legislative changes have weakened the once-renowned Corruption Eradication Commission (KPK). In El Salvador, constitutional reforms and executive overreach have dismantled mechanisms for prosecuting corruption, while in Hungary, misuse of EU funds and state capture remain persistent concerns.[43]

A more hopeful countertrend has emerged in the legal fight against environmental crime, especially in Latin America. Several countries are developing or strengthening criminal statutes specifically to address environmental offenses, which often intersect with corruption. As of 2026, countries like Mexico, Singapore, Colombia, and Brazil have begun leveraging legal tools like anti-mafia laws, special environmental task forces, and international agreements to prosecute actors engaged in illegal mining, deforestation, and wildlife trafficking.[44]

Another significant area of reform is the expansion of whistleblower protections. The EU Whistleblower Protection Directive, which came into force in 2021, is now influencing legal reforms across EU Member States, requiring the establishment of secure internal

and external reporting channels, protection against retaliation, and clearer pathways for follow-up. However, implementation across the bloc has been inconsistent, with civil society watchdogs noting that actual protections remain patchy and unevenly enforced.[45] The OECD has called for stronger follow-up measures, including the resourcing of national authorities and consistent enforcement standards.[46]

There has also been a marked increase in beneficial ownership transparency initiatives. Global momentum around financial secrecy has led to new legislative requirements for centralized beneficial ownership registries in numerous jurisdictions, including EU countries and major financial hubs. The World Bank notes that such registries are crucial for tracking illicit financial flows, preventing fraud, and prosecuting corruption-related asset concealment.[47] Progress is notable in the Global South as well, where countries like Uruguay, Ghana, Kenya, Colombia, Ecuador and Argentina have made regulatory advances.

Technology is playing a dual role in the global anti-corruption landscape. On one hand, data-driven enforcement tools, such as cross-border analytics platforms, digital procurement monitoring systems, and real-time asset declaration databases, are becoming more widely used. The UNODC, for instance, has developed a suite of digital tools for countries to use in asset recovery and corruption case management.[48] On the other hand, there is growing concern over the digital repression of critics and activists. As governments digitize their oversight infrastructure, some are simultaneously expanding the surveillance of journalists, whistleblowers, and civil society organizations, raising alarms about shrinking civic space and retaliatory practices.[49]

Another encouraging development is the growing criminalization of illicit enrichment. A number of jurisdictions have passed or strengthened laws that allow for the prosecution or investigation of public officials who possess assets disproportionate to their declared income, even in the absence of direct bribery evidence. GI-TOC notes that illicit enrichment laws are increasingly being used to address corruption where evidence of quid-pro-quo transactions is difficult to gather, particularly in organized crime contexts.[50]

In parallel, international watchdogs are increasingly spotlighting how corruption impedes climate action. According to Transparency International's 2024 CPI report, the absence of transparency and accountability in climate finance has led to the mismanagement and misuse of critical adaptation and mitigation funds. The report calls for stronger oversight mechanisms as climate investments scale globally.[51]

The surge in 'dark money' and undisclosed political donations also presents an emerging threat to democratic governance. In Australia, even as the country improved its CPI ranking in 2023, the government acknowledged that opaque financing mechanisms continue to erode public confidence.[52] This pattern is evident globally, as political donations often serve as a vehicle for corruption and elite capture.

At the same time, global sanctions have emerged as an anti-corruption enforcement tool. In December 2024, the U.S. and U.K. imposed targeted sanctions on individuals and companies involved in the illicit gold trade. The action aimed to disrupt the financial flows fueling both corruption and geopolitical conflict, particularly in connection to Russia's invasion of Ukraine.[53] These sanctions signal a growing recognition of how corruption, resource extraction, and armed conflict intersect.

Finally, recent research has underscored the economic implications of corruption. A 2024 study found that while corruption may offer short-term economic incentives in fragile states, it often distorts markets, reduces foreign investment, and increases long-term instability. The findings highlight the need to differentiate between immediate fiscal returns and the longer-term structural harm caused by institutionalized corruption.[54]

Collectively, these developments illustrate that while anti-corruption tools and norms are expanding, so too are the tactics and systemic entrenchment of corrupt actors. Whether recent gains can be sustained will depend largely on institutional independence, political will, and the ability of civil society to push for enforcement across both criminal and financial fronts.

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VIII.

ANTI-CORRUPTION INTERVENTIONS: MOVING FROM THE STRATEGIC TO THE TACTICAL

Holistic responses to environmental crime and their convergence with other illicit activities, including the bribing of enablers, continue to be hampered by bureaucratic silos, by type of crime and borders, and by the aforementioned mutual mistrust that festers in areas with endemic corruption. ELI and others have shown repeatedly that TCOs are constrained by neither silos nor borders. Additionally, the delta between official resources and TCO resources is enormous, making it all the more necessary to find secure ways to pool knowledge and collaborate for maximum efficiency, including de-duplication and de-confliction of efforts. This cannot be done without centering effective anti-corruption measures.

Many if not most governments do not center anti-corruption in their efforts to combat environmental crimes, even in places where the extent of environmental corruption is well known. For example, upon retaking office, Brazilian President Lula da Silva announced plans to counter deforestation by better integration of imagery, financial data, land registry information, and other information.[1] However, Brazil's Fifth Phase Action Plan for the Prevention and Control of Deforestation in the Legal Amazon mentions corruption only once in its 100+ pages, and that is only to say that anti-corruption actions should be developed.[2] This is despite recent high-profile probes into senior officials' ties to timber trafficking. In 2021, for example, two separate investigations involving the Minister of the Environment were opened within just 2 months, one of which included an accusation by the Amazon Federal Police Superintendent that he had obstructed investigations into the country's largest illegal timber seizure.[3] [4] The other resulted in the court-ordered dismissal of the head of IBAMA.

Large gaps remain in our understanding of what works to prevent, deter, and punish environmental and wildlife crime and corruption.[5] From a strategic standpoint, then, we must better understand what our biggest knowledge gaps are and seek to fill them. Sosnowski et al. have noted that there is a lack of data on prosecutions and judicial outcomes for wildlife crime and the Basel Institute has noted the same for environmental corruption.[6] Better tracking and analysis of the factors that allow (or prevent) cases being brought to trial with successful outcomes would inform anti-impunity efforts worldwide. While there is general consensus that focusing on low-level members of criminal networks is ineffective at impacting TCO activities, the same may not prove true when it comes to combating low-level or local corruption. In fact, effective tackling of corruption close to the point of origin for environmental crimes may offer an opportunity to deprive TCOs of any value addition to fund their expansion. Better tracking of law enforcement and judicial outcomes would in turn allow for better analysis of impacts on environmental crime, and the role of corruption enforcement on illicit supply.

Taking this a step further, one of the hardest truths of environmental and wildlife crime work is that even successes such as convictions are qualified successes, as they necessarily occur *after* environmental and wildlife crimes have been committed. While some outcomes can disrupt further destruction, the loss and damage to species and ecosystems is very often permanent. This begs for focus on better upstream strategies focused on prevention and early intervention, and these must include public and private sector enablers. Preventing the spread of corruption is one area ripe for research. Changing the risk-to-reward calculation is fundamental to more preventative approaches to environmental crime and corruption, but the how is as yet frustratingly unclear. Learnings from successful investigations and prosecutions should be applied to finding more opportunities for preventive and deterrent actions.

Where prevention fails, we need a clearer understanding of when and where interventions can be most impactful. For example, there is an open question regarding whether seizures may in some cases spur more poaching, logging, etc. to "make up" losses, and there must be serious attempts to answer it. This may in part depend on the commodity–for example, it may be harder to quickly find more gold from an illegal river dredge than to send poachers back into the woods for additional wildlife. To build a strategic framework, we must look at the ripple effects of behavioral changes after an enforcement action or regulatory change, and see what those ripple effects suggest regarding the 'how' of crime. What are the immediate changes in a system, and what are the implications? It is worth looking at whether there is an uptick in the granting of applicable permits after major seizures, for example. New regulations or restrictions may be correlated with suspect data changes, for example, when an IUCN species status change prompted new fisheries rules in Ecuador, the "bycatch" of certain species mysteriously skyrocketed.[7] Frameworks that can be adapted to follow specific supply chains in specific locations will allow tailored planning from the strategic to the tactical.

Perhaps the most difficult aspect of tackling corruption, apart from its opacity, is the question of leverage in environments where it is the "operating system". When both sides in a relationship involving official corruption–criminal entities and corrupt enablers–are satisfying their interests, it is challenging to find points of influence to expose and break that relationship. Internal oversight functions cease to work. Transparency, driven by a healthy press and engaged civil society that can expose truths and apply pressure, is necessary but ultimately insufficient without leadership willing to exercise oversight and accountability responsibilities. In Guatemala, for example, the state has targeted anti-corruption members of the judiciary and the press.[8] In some cases, this may necessitate robust application of international law that allows corruption cases to be pursued elsewhere with appropriate jurisdiction, such as via illicit financial flows.

Lastly, anti-corruption efforts within countries need to steer clear of politicization to be impactful. Too frequently, corruption probes focus on a rival party or previous administration without the same level of scrutiny directed within the current ruling party. Similarly, anti-TOC efforts that are focused only on rivals to those affiliated with an official or party only give powerful advantage to favored criminals. This does not lessen corruption or crime, it simply tilts the playing field with bias.

Tactical Interventions by Sector

There are no silver bullets and no system is foolproof, but there are certainly ways to make it harder to bribe or be bribed in furtherance of environmental crimes. Effective tactics will be grounded in corruption risk frameworks that consider what is known about corruption vulnerabilities for the relevant places, commodities, and actors and where real impact can be made given local realities. Useful tools to do these assessments while planning interventions are available from organizations such as the Basel Institute.[9]

It should be noted that state attention to environmental crime and corruption is still fairly recent, and as mentioned, there is not yet robust data on what is most effective to counter them. However, by looking at places and entities that have led or innovated in specific instances, we can start to piece together layered multi-stakeholder tactical approaches that seek to replicate the most promising examples from laws, civil society action, financial pressure, and technology into comprehensive plans. It is also worth asking what outliers have to teach us: agencies that have the reputation of being hard to bribe, anti-corruption bodies that build winning cases against those who seemed untouchable. By learning from and replicating effective tactics in tandem, we can begin to create appropriate holistic, multi-pronged approaches.

As shown above, taking a systematic, comprehensive look at the entirety of supply chains is useful to define the biggest vulnerabilities at each stage of value addition for illicit commodities and to identify the public and private sector enablers facilitating the crimes. This kind of analysis can highlight bottlenecks that offer opportunities for disruption, or which stages provide realistic openings based on commodity. For example, fisheries experts broadly agree that there are few opportunities to root out evidence of IUU activity and corruption at or past the processing stage, and that interventions most likely to be successful are carried out early, prior to the landing or transshipment of catch to reefers.[10]

The supply chain framework–which has also been used by NGOs such as Transparency International–allows for identifying and combining interventions that are tailored by commodity and location,[11] ideally with impact evaluations. The ideal tactical toolkit would chain together the best interventions for a deliberate and coordinated multi-pronged approach throughout the value addition stages in specific scenarios, such as the laundering of illegal gold from the Peruvian Amazon.

Effective tactical planning includes understanding which actors are vulnerable to which types of action. For example, where actors feel secure enough to withstand exposure with little fear of accountability, financial institutions, suppliers, buyers, or others whose business intersects with the exposed individual may prove sufficiently risk-averse to cut ties with them, applying indirect pressure and isolating them from the apparatus they need to thrive. While tactics need to be tailored, some general themes emerge repeatedly as applicable to multiple scenarios:

- **Technology** has immense value at multiple stages of supply chains and for nearly any natural commodity that can be laundered into the economy. Imagery and drones help monitor land use in places where ground-truthing presents safety, logistics, or resource constraint challenges and have been used from Virunga National Park in the DRC[12] to Uttar Pradesh[13] to Brazil. It is equally valuable further along supply chains for countries,

companies and lending institutions to perform the due diligence necessary to cut off financing for environmental destruction or break supplier relationships as needed. Various types of technology can reveal origins of certain metals and timber,[14] [15] [16] identify illegally caught and sold species by DNA sampling, and in some cases demonstrate the differences between captive-bred and wild-caught animals.[17]

- **Randomizing and rotating** assignments or duty stations can sometimes be helpful in assigning court cases, immigration controls, park rangers, and Customs teams. However, the disruption of good-faith investigations or trials already in process should be avoided.

- **Digitization** of processes and documentation and distribution of digital records to avoid tampering and document accountability can reduce opportunities for bribes (or threats), and preserve evidence in places where folders tend to be 'misplaced'. Structured digitized data allows for data analysis of anomalous behavior, e.g. why one magistrate has a low rate of conviction or why certain immigration officials have approved an exceptionally high number of visas for a certain country's nationals. In Southeast Asia, Malaysia and Indonesia have leaned heavily into digitization processes for better analysis.[18] Sophie LeMaitre points out that digitization must be accompanied by robust support for affected employees, not only for teaching new skills, but to assuage fears that digital processes will threaten their jobs or other concerns regarding change. In some cases, there may also be bureaucratic resistance to the reduction of opportunities for bribes. She emphasizes that any tool must be accompanied by anti-corruption efforts focused on people and culture and "the need to support people through change" for effective implementation of new systems.[19]

- **Transparency** is a recurring theme at all levels in allowing for oversight by both officials and civil society, though the appropriate level of publicly available detail must be carefully evaluated to avoid unintended consequences. A good rule of thumb is to publish data that allows for the discovery of anomalies worthy of further investigation without revealing personally identifiable information (PII) or sensitive sources and methods of countercrime efforts.

It would be beneficial to have rigorous quantifiable research into anti-corruption intervention outcomes to evaluate what has proven effective, so that these models can be adjusted for local conditions and piloted for potential replication. Such analysis needs to give at least equal weight to both laws on paper and the realities of enforcement; studies that focus only on regulations will overlook working conditions, political will, and funding realities that ensure the application of regulations. To think about the tactics available to different stakeholders in support of the above notes on overarching strategy, we've grouped recommendations below by stakeholder categories.

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IX.

RECOMMENDATIONS BY STAKEHOLDER

In this section, ELI lists an extensive set of recommendations categorized by spacific stakeholders, drawing on what we've learned about the key actors and mechanisms of corruption along the lengths of various illicit supply chains. We encourage these stakeholders to engage closely with these sector-specific asks, using them to close exploited loopholes, improve detection, and take an active role in thwarting TCOs' continued destruction of our planet. TCOs cooperate, learn from each other, and share tasks based on areas of specialization to an unsettling degree. Counter-TOC responses cannot afford to be less unified and collaborative.

While there are specific action items for governments, the financial and private sectors, law enforcement and judiciaries, and civil society, it must be emphasized that all of these must work in tandem to combat the power of organized crime and the long arm of its corrupting influence. In addition, while stakeholders need to take sector-specific steps to effectively stem the expansion of TCO's power and destructiveness, there are also cross-cutting themes among all stakeholders, such as the emerging role of technology to monitor, trace, and verify different parts of supply chains. In addition, transparent, publicly available records for official documents along supply chains, from land titles to export permits, are badly needed to catch and preempt misdeeds, assess patterns, and pursue accountability for enablers. Strong laws are always a cornerstone but mean little if not actively enforced. As noted in the paper, zone defenses are only as strong as the weakest link, meaning that collaboration and strategy must be as global and responsive to changes as TCOs have repeatedly proven themselves to be.

Based on ELI's field experience, long-term intelligence collection and undercover operations remain among the most critical tools for uncovering the human networks that sustain corruption across all stages of illicit supply chains.

Governments:

While gaining ground against corruption is especially daunting when it's systemic, moments of political change may offer windows of opportunity. The adage attributed to Winston Churchill about never letting a crisis go to waste can be applied when political upheavals, particularly those driven by corruption scandals, strengthen support and momentum for systemic change. In these moments, leaders who are sincere about improvements can take actions such as inviting the support of the international community, as Guatemala did with the UN-backed CICIG,[1] mandate greater transparency, and create or empower independent anti-corruption bodies as detailed below. Natalia Muñoz Cassolis has pointed out that moments of national aspiration to join multilateral bodies provide similar opportunities.

Additionally, independence for key anticorruption actors such as prosecutors, FIUs, and anti-corruption agencies and commissions is part of a larger need to ensure a balance of power within governments; a point emphasized by Gaston Schulmeister, former head of the OAS DTOC office. He views balance of power as a key factor in the pervasiveness of corruption, and suggests considering decentralization in areas where concentrated power, for example within a single federal law enforcement agency, has concentrated corruption as well. While debated, he points out that in some instances, this arrangement can allow for work-arounds in which law enforcement does not meet a single point of failure (ELI, 2025).

- **Lay a solid foundation with strong laws for environmental crimes and corruption**. While the biggest challenges are often in enforcement, having good laws is an essential first step in the fight for accountability. The Anti-Corruption Resource Center has a helpful list of offenses that should be covered under the broad topic of corruption.[2] The setting of penalties in the criminal code should be informed by the profitability of illegal activities, lest the laws fall far short of providing either deterrence or justice. In a high-profile case in Indonesia in 2023, a defendant convicted of deforestation and bribery (originally) received a 15-year sentence and a financial penalty of $2.7B, because the state tied the fine to the assessed losses to the state and to the economy.[3] This is a good precedent to make crime and corruption less profitable. In addition, while challenging to pass in the most needful environments, it may be worth fighting for laws barring political candidates who have previously been convicted of corruption[4] or related offenses. Environmental, wildlife, and corruption offenses should be included on lists of predicate crimes for organized crime statutes and money laundering offenses.

- **Build smart information-sharing tools and databases**. Shareable, tamper-proof digital systems can impede opportunities for corruption. They make it hard to slip someone cash while applying for a permit or deed. They secure imagery and documents to prevent "missing" evidence. Online permitting and titling systems paired with imagery or AIS data can refute false claims regarding activity, automatically reject claims in no-go zones, and show mismatches between where permits allow activity and where activities are actually happening.[5] [6] Global Forest Watch and Global Fishing Watch have offered exceptional information and assistance to governments needing these kinds of data. Registries must be updated when abuses are revealed so that defunct mines or untouched logging concessions cannot continue to be misused on documents. These tools may also help prevent the retroactive legalization of illegal land grabs and deforestation,[7] though this relies on creating clear, deconflicted records of designated land use and ownership that in many places still do not exist. Dispersed digital records, such as Blockchain, must be applied carefully. While they are hard to tamper with and show clear chains of custody downstream, they cannot prevent false information from being entered into the system at the outset, and can therefore enshrine it if inputs are not adequately vetted.

- **Leverage data analytics**. With good databases, data analytics can flag anomalous actions that merit additional scrutiny, such as officials who grant unusually high numbers of visas to nationals from a specific country, or Customs officials who have been the only ones clearing shipments from certain senders. C4ADS has done interesting work identifying port agents in Peru who handle the majority of particular issues.[8] UNODC has championed the increased use of data analytics in areas particularly prone to corruption and fraud;[9] While much of this work has initially focused on the often-fraught topic of procurement, there are also very promising possibilities for spotting environmental and

wildlife permitting irregularities. The OECD has been very forward-leaning in this realm, seeking to maximize not only data analytics, but also exploring potential uses of AI and LLMs to analyze and flag potential indicators of corruption within large data sets.[10] [11]

- **Fully support the independence of prosecutors, FIUs, and anti-corruption entities**. Anti-corruption operations Metastasis and Purga in Ecuador, where the Attorney General is selected by an elected committee rather than presidentially appointed,[12] exposed and prosecuted ties between an array of powerful officials and criminal groups.[13] In Chile, the Engel Commission was given full independence by President Bachelet, which helped its credibility.[14] Hong Kong's Customs successes in interdicting illegal commodities are credited in part to its Independent Commission Against Corruption and the country's strong anti-corruption laws; the agency's officers have a reputation for being difficult to bribe.[15] Nonetheless, Guatemala's CICIG[16] and Indonesia's KPK[17] were politically attacked after notable successes, underscoring that such bodies can be highly successful when protected, but gutted by threatened elites if not, even with broad public support.[18] UNODC has similarly cautioned against "excessive discretion" granted to a small handful of individuals.[19]

- **Mandate and enact transparency**. Public officials committed to fighting corruption can help make information publicly available, which helps civil society, scientists, and journalists highlight irregularities. Access for experts to review information is especially important where government oversight is unreliable. For example, implausible breeding rates for "captive-bred" animals are a flag for wild-caught animals being laundered for export.[20] Beneficial ownership and real estate registries should be publicly available, as they are indicators of illicit financial flows. Trade discrepancy analyses are helpful but cannot account for the entirety of illicit supply chains.[21]

- **Implement anti-corruption best practices in vulnerable agencies**. A body of research shows that done well, the regular rotation (shift, location, and colleagues) of Customs personnel and the randomization of checks can help disrupt the establishment of long-term relationships between officials and criminal networks.[22] This technique has been used at airports to deter human smugglers.[22] However, as noted above, without adequate protections, rotations can also be abused to punish honest officials and prematurely close investigations. Internal reporting mechanisms, with adequate employee protections, are also useful. We assess that internal reporting is important to preventing corruption from becoming pervasive in places where it is yet not.

- **Tighten controls over permitting processes and perform spot checks**. ELI's investigations in Mexico have noted that the tightening of permitting and export controls for shark fins and totoaba have added significant costs and risks to traffickers. When permits for wildlife trade are easy to obtain via bribes or falsify, the market prices for wildlife actually increase because of the veneer of legality and/or sustainability.[23] In many places, a still-needed first step is simply to move from paper-based to digital systems, which to be fully effective must be interoperable with other relevant agencies, difficult to tamper with (for example, via dispersed copies of recorded activity), and easy to audit for accountability.[24] It is incumbent upon governments to tightly control access to documents that allow the sale and shipment of environmental products and wildlife and to ensure robust oversight. Transparency International has pointed out that in cases of laundered timber, once a permit has been viewed at one stage—e.g. a local logging road checkpoint—authorities further along the supply chain may not check re-check documentation.[25] It may be helpful to implement a system of randomized spot checks all the way through export. Even low proportions of randomized checks in a well-designed system can improve controls without adding excessive administrative costs.

- **Approach defenses regionally and center anti-corruption efforts**. Anti-corruption work and strengthened monitoring must be regional efforts, as TCOs have shown repeatedly that they will easily switch their operations to the weakest point. ELI documented this with the TCM trade in Europe and the displacement–also known as the balloon effect–of trade in ivory, rhino horn, and tiger parts to other parts of Southeast Asia when enforcement tightened in mainland China and Vietnam. MongaBay has highlighted regional working groups such as the The Fisheries Committee for the West Central Gulf of Guinea (FCWC), which share technology, patrols, and intelligence, while acknowledging that corruption within these working groups has at times affected the evenness of implementation and progress.[26]

- **Refuse entry to corrupt foreign officials and their assets**. Governments may refuse entry to corrupt foreign officials and their ill-gotten gains, or seize them with sufficient evidence and jurisdiction, making it clear that they are unwelcome.[27] Publicity can put accountability pressure on both home and host countries. For example, the UK ended its Tier 1 investor visa, aka a "golden visa", in 2022 amid pressure; a subsequent review found examples of use by individuals highly likely to be involved in organized crime and corruption.[28] [29] From 2010 to 2025, the U.S. DoJ's Kleptocracy Asset Recovery Initiative scored notable successes against officials who stole from their nations.[30] [31] Complicity in environmental and wildlife crime should be a PNG-level offense for diplomats and elected officials. ELI and others have revealed instances of diplomatic personnel taking advantage of their status to source, purchase, and transport illicit goods.[32] The U.S. State Department implemented visa restrictions on wildlife and timber traffickers in 2020, but it is unclear whether these are still being applied as of 2025.[33]

Law Enforcement:

Law enforcement work in pervasively corrupt environments is a continual state of tension between needing to share information to counter crime, while also needing to protect information to counter crime. The loss of public trust in these environments cuts off crucial avenues of local knowledge and information sharing, creating a need for anonymous reporting mechanisms. As always, following financial trails is fundamental to identifying enablers, imposing accountability, and dismantling criminal networks, and making it a standard component of anti-environmental crime and corruption work remains a high priority.

- **Financial investigations must become standard components of cases**. This is a consistent plea from the anti-crime community.[34] Financial investigations are a means to assess full crime portfolios, illicit revenue streams, and dirty cash-based investments into licit assets that may be seizable.[35] They are key to building bigger cases, applying organized crime statutes, prosecuting public and private sector enablers, and making sure that asset seizures are commensurate with crimes committed, ideally creating a barrier to re-entry into illicit markets. To incentivize and support these more holistic, resource-intensive cases, it is worth considering putting a portion of seized assets back into funding the units that build them. The assets of family members, including minors, should always be included in financial investigations.[36] Julia Yansura of the FACT Coalition highlighted a procedural change in Colombia

whereby environmental crime cases are simultaneously referred to environmental and anti-money laundering prosecutors to regularize concurrent financial investigations.[37] Yansura noted that this solely administrative change had the added appeal of requiring neither legal changes nor top-down political will.

- **Keep sensitive operational information close-hold**. Given how damaging leaks are, information about arrest and seizure operations should be kept close-hold, with details of sensitive operations like simultaneous raids shared at the last moment, and possibly kept compartmentalized even during the operations. Decisions about how best to protect information depends in part on where the biggest corruption challenges are. For example, where corruption is concentrated at the state or department level, it may be wise to hold information at the federal level. There is an inherent tension between this and the need for inter-agency information sharing and collaboration. Ultimately how these are balanced will be situational. For example, a GI-TOC analysis of the Chaimat network in Thailand noted that authorities deliberately and successfully involved a number of agencies so that the main suspect's "buying power did not go quite far enough" to bribe everyone.[38]

- **Offer anonymous reporting mechanisms and implement whistleblower protections**. Where the cost of sharing information may be one's life, potential whistleblowers and tipsters need channels by which they can share information without fearing exposure. These can be channels such as ELI's WildLeaks[39], or government-initiated mechanisms. It is important to reach diasporas with these tools, as they are often the first to be extorted or threatened by criminal networks with roots in a shared place of origin.[40] [41] Reliable witness protections are undeveloped in many places but needed to complement confidential reporting mechanisms. While many countries have good laws, as Jose Ugaz and Visi Pikoli have pointed out, in corrupt environments names are quickly leaked and proper implementation is lacking.[42] Successful prosecutions may rely on insider testimony, but pervasive corruption threatens the lives of witnesses and their families. Without the ability to provide assurances for safety, people who are too afraid of repercussions will not come forward.

- **Destroy evidence that can't be secured after it has served its judicial purpose**. Leakage from evidence storage back into illicit supply chains continues to be a challenge. ELI sources confirmed that seized totoaba bladders held by Mexican authorities were later seen for sale in the same markets from which they were confiscated, despite having been stored in public freezers controlled by fisheries inspectors. EIA reported that in Mozambique, a third of its seized ivory was stolen in 2018.[43] The Elephant Protection Initiative has a stockpile management system for ivory, and will also assist countries in destroying what cannot be secured, with forensic samples kept for future needs.[44]

Prosecutors and Judges:

Prosecutorial and judicial capacity remain a challenge worldwide, even before factoring in corruption. In the 2023 Capacity to Combat Corruption report on the Americas, the three highest-ranking countries still scored lower than 5/10 on measures of judicial independence and efficiency.[45] The result was the same for anti-corruption bodies, even as the countries' highest scores were for quality of democracy and quality of journalism. Location-specific assessments are needed to determine where weaknesses are attributable to corruption, resource constraints, lack of independence, and/or insufficient legal penalties in the national code.

- **Prosecute private sector enablers**. Enablers' misuse of their offices, licenses and campaigns should be prosecuted to the maximum extent of the law. Where there is a lack of laws, they need to be created. For example, in Singapore, the intermediaries for bribes are fully liable.[46] Former officials who are no longer in office but sell their knowledge and access–the UN has noted the role of former park rangers in the IWT[47]–should be subject to penalties on par with currently serving officials. This is easier said than done, particularly in countries with small, highly interlinked elites. For example, in 2024 all 28 Panama Papers defendants were acquitted.[48]

- **Anything purchased or given via bribery should be confiscated**. Convicted corrupt actors should lose the entirety of the (detected or reasonably estimated) amount they received via bribes, including any assets paid for with or given as bribes. A former Cook Islands Minister of Marine Resources reportedly accepted a million dollar "loan" from a Chinese company caught repeatedly engaging in shark finning. He paid approximately a quarter of this amount to a government agency in fines and was allowed to keep the island resort he bought.[49] He also successfully appealed for his jail term to be redacted from almost 2.5 years to 6 months.[50] Examples abound of ex-officials living well off of properties and businesses purchased with bribes from their "public service".[51] Corruption should *never* be a retirement plan to live off the profits of destruction. Nigeria's Proceeds of Crime Act 2022 is one effort to centralize and deconflict a hodgepodge of prior regulations that left plenty of loopholes, paving the way for confiscation of assets purchased with criminal proceeds. While imperfect, it is an exemplar worth watching as it begins to be tested through the courts.[52]

- **Penalties for moving dirty cash must include personal liability subject to jail time**. Accountability on a personal level is underused as a deterrent for complicit financial institutions and other popular money laundering entities, even though they can be particularly impactful on enablers. For example, individuals in specific roles at casinos involved in money laundering in the U.S. and Canada are personally liable for jail time.[53] The threat of bank executives personally serving time in prison would create a much different calculation for their decision-making than the threat of institutional fines.

- **Track and publish judicial outcomes**. A major impediment to analyzing environmental crime and corruption case outcomes is that data beyond arrests is not tracked, not aggregated, and/or not made available. Building good datasets is a long-term project essential for informed analysis of the scope of the problem and the vulnerable points in systems of accountability. Good data also allows for analysis of unusual outcomes, such as a notably low number of convictions or light penalties from a court or individual.

- **Expedite appeals or case transfers for prosecutors where local systems are captured by criminal interests**. In areas where those prosecuting on behalf of the environment or wildlife have well-founded suspicions or proof of judicial corruption, federal justice systems can consider setting up an expedited path for appeals. The multi-year appeals systems that plague many countries simply allow destruction to continue unchecked. In addition, in areas where local prosecutors cannot fully exercise their duties or receive a fair trial, such as in the case of a Peruvian case study by the Council of the Americas, paths might be created to allow for handoffs to the federal level.[54]

- **Place checks on the abuse of executive power to protect or pardon**. Misuse of executive tools such as pardons undermines the rule of law and justice systems. In 2025, the government of Malawi attempted to pardon a Chinese national who had been sentenced to 14 years for wildlife trafficking after years as a fugitive; however, the Anti-Corruption Bureau successfully filed an injunction against his release, in part because the convicted man was still facing charges for attempting to bribe the judge at his trial and prison officials.[55] [56] The former head of CITES in Guinea was sentenced to only 18 months for his role in trafficking at least 130 great apes. Despite this light penalty, he was granted a presidential pardon that released him from jail early.[57] In areas with a high likelihood of interference by open-palmed executives, mandatory minimum sentences or the revocation of unilateral pardoning powers may be carefully considered.

The international community and civil society

- **Exposure of corruption by journalists and civil society organizations**. Journalism matters. Solid and courageous reporting has time and again been what galvanized accountability. For example, Namibia's Fishrot scandal, in which the Fisheries Minister and the Justice Minister are among the accused in accepting $15 million in bribes from an Icelandic fishing company, was exposed by a Namibian newspaper and Al-Jazeera.[58] In Indonesia, an environmental group painstakingly mapped examples of environmental corruption that implicated nearly 50 companies and every level of government.[59] In countries where media is tightly controlled and/or domestic publication about specific people and activities can cost journalists their lives, international attention helps information reach the public. Global attention can force governments to take some level of action. Continued attention can push those actions to be sustained.

- **Ongoing tracking of judicial outcomes**. This is a deliberate repetition of the same recommendation made for the judiciary, as jurisdictions with the most need for judicial outcome transparency are the least likely to implement it. Often, headline-grabbing sentences or record fines are quietly pardoned or reduced once they have slipped from the front page. Without sustained public attention and scrutiny, and sometimes even with it, people arrested with fanfare are quietly released, seizure orders are never followed through,[60] and/or confiscated goods make their way back into criminal hands. Civil society, especially journalists, are vital to maintaining scrutiny on the justice system to ensure that accountability isn't a temporary act. The aforementioned Indonesian palm oil tycoon got his $2.6B fine reduced to $144M later that year.[61] While we lack evidence that this particular occurrence was an example of bribery, the lack of transparency surrounding the court's puzzling decision underscores the need for long-term monitoring.

- **Stringent oversight and contractual terms for development funds**. Instead of accepting that some funding will be lost to corruption in internationally-funded projects, donors should be willing to enforce high levels of transparency and accountability, pull funding from projects with substandard accounting, and reward recipients that meet high standards with further investment. In one African country where ELI investigated, a powerful and politically connected businessman was widely assumed to be involved in the ivory trade, but despite the public nature of the allegations, he was able to get loans from the U.S. government.

- **Keep strengthening and expanding global information-sharing networks**. Given the global interconnectedness of criminal networks, journalists and CSOs combating environmental crime and corruption need strong networks and information-sharing mechanisms. The Organized Crime and Corruption Reporting Project's (OCCRP) and the Global Initiative Against Transnational Organized Crime (GI-TOC) are good examples. Deconfliction and de-duplication of work among CSOs would help ensure that some places are not overrepresented while others are largely ignored, and would contribute to better distribution of coverage. Donors can play a role by encouraging collaboration. In addition, as pointed out by U4 in a fisheries corruption paper, most work on corruption in fisheries is done by corruption experts, not fisheries experts.[62] This is true of other areas of environmental, wildlife, and financial crime, and crime and corruption-focused entities should proactively engage and learn from industry practitioners to ensure that their publications and recommendations are accurate, sufficiently detailed, and feasible.

- **Continue building both capacity and safety measures**. Capacity-building is normally applied to government entities, but should also be centered on civil society organizations and journalists who find, analyze, and publicize evidence of corruption. As the better citizens get at exposing crime and corruption, the greater the risks may become, support to improve safety is needed, such as training on secure communications, spotting surveillance, or keeping electronic devices secure.[63]

- **Message to build anti-corruption majorities, including key stakeholders**. Civil society organizations that wish to combat environmental crime and corruption can do much to share information beyond their support base. It is imperative to find new outreach channels and messaging strategies to gain the support of majorities and give people clear, actionable takeaways. Publicizing good research can help the public realize that they are actually in a majority and have power. For example, research by Chatham House found that while 88 percent of respondents disapproved of judicial corruption, most assumed that their communities were more tolerant. As Dr. Leena Koni Hoffman, the author, pointed out, sharing findings such as these may help people unite on a larger scale for anti-corruption work because they see that they have numerous allies.[64] Tailored outreach and education regarding the full impacts of environmental crime and corruption for key stakeholders, such as the judiciary, should be a high priority. Sophie LeMaitre has stressed the need for both data and narrative examples that concretely drive home the extent of environmental and human impacts.[65]

Private Sector and Financial Institutions:

Much of the value that private sector and financial entities can offer involves enhancing due diligence measures to cut opportunities for corruption within supply chains. For example, if gold traders know that end user companies will be testing chemical signatures and/or for the presence of mercury and may break supplier relationships over discrepancies, there is less incentive to launder illegal gold into at least those particular supply chains. While catching bad behavior close to the source is ideal, the realities of corruption on the ground mean that end users have roles to play by monitoring their suppliers and applying downward pressure as warranted.

- **Flatten supply chains and enhance due diligence.** The further a commodity gets from its point of origin, the harder it is to determine the legality of its origins.[66] One European refinery simply stopped accepting any gold from Peru in 2019.[67] Companies that are committed to clean sourcing can do more to cut out layers of middlemen to exercise more oversight and control and remove some opportunities for laundering and corruption. Certification systems are steps toward traceability and transparency, with the caveat that no system is foolproof and may offer opportunities for falsification,[68] [69] resulting in laundered goods with a respected imprimatur. TNRC noted in a 2021 paper that traceability systems for fish and timber were not designed to address corruption;[70] something that has also been pointed out regarding CITES. This strongly suggests that traceability schemes should factor in corruption during design processes, with independent verification and data validation as necessary components. Nonetheless, flawed efforts toward traceability are an improvement over the laxity of "good faith" standards for sellers of fraught materials such as gold.[71] Companies can perform more due diligence in sourcing where they cannot buy directly, and engage governments, trade associations, or civil society groups to better understand red flags, such as metals listed as coming from non-existent or decommissioned mines.

- **Financial institutions and investors should also be required to engage in additional due diligence for at-risk natural resources**. It's no secret that financial institutions and investors play a role in abetting natural resource crimes and corruption. While banks–in theory–use enhanced due diligence procedures based on customer profiles and financial activities, they too should be required to expand their checks for customers affiliated with industries such as gold mining or timber, including those in a position to benefit from illicit activity. For example, funding entities can verify sourcing claims or claimed addresses of companies via imagery and implement policies refusing to enter into relationships with companies with track records of infractions and penalties. There are a few promising examples of shareholders pushing companies to do better,[72] but this needs to become standard.

- **Implement sampling and reverse-engineering protocols for risky supply chains**. Committing to sampling of commodities where testing can reveal illicit origins or species would alert companies to laundering among their suppliers of timber, metal, fish, and certain types of wildlife and ideally allow them to reverse-engineer supply chains to identify the problematic sources and apply downward pressure. Where supply chains cannot be reverse-engineered, they may need to be streamlined for traceability. A 2017 study was able to differentiate between skins from captive-bred and wild-caught pythons destined for luxury markets with 100% accuracy.[73] Timber can be spot-tested in shipments that may be hiding protected species.[74] Improved detection of mercury in gold could lead to rejection of shipments, refusal to pay, and severance of supplier relationships–all strong disincentives. While supply chains are complex and there are challenges, sampling can be combined with other due diligence tools to flag priorities for follow-up investigations, including sussing out who enabled the introduction of the illicit goods. Companies could incentivize suppliers to do additional sampling, for example by offering credits or reimbursement to defray costs for companies that honestly report undesired results, hand over the relevant imports, and share information with authorities.

- **Support the establishment of beneficial ownership registries**. Private sector companies and financial institutions that are serious about combating environmental destruction and its enablers can publicly advocate for and support the establishment of these registries, particularly in countries where relatively small elites tend to cycle between government administrations when their party is in power and business interests, creating clear conflicts of interest and the potential for self-dealing.

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CONCLUSION

Anti-corruption efforts must be a fundamental component of all work combating environmental crime, given that the two are inextricably linked in every location and along every step of supply chains. That's not to say that to make progress protecting our oceans, forests, and wildlife, that we need to entirely "solve" corruption. We do, however, need a much deeper and more nuanced understanding of its role along different illicit value chains and in specific contexts to see and act on opportunities to thwart it and finally turn the risk-benefit calculations much more heavily toward risk. Robust continued learning from counterparts worldwide can point to success stories to be adapted and applied elsewhere, until a full suite of best practices is developed that can be applied at every key node, from sourcing to export. ELI's investigative information detailed throughout this paper sheds light on criminal perspectives–how TCOs think about risk, opportunity, relationships–to further inform approaches based on vulnerabilities and bottlenecks.

There is a tremendous amount of work to do if we want to reverse the trends of massive loss on land and within the seas, and given TCO resources, flexibility, and borderlessness, those seeking to fight for the planet must be as organized, strategic, and collaborative as possible to counter the criminal underworld. It's daunting and sometimes dispiriting work, but global "good guy" networks are drawing closer all the time, technical tools and knowledge sharing continue to improve, and the community has tremendous drive to protect the planet. The information and recommendations above are meant to help anti-corruption practitioners and environmental defenders develop strategic frameworks with which to think holistically through opportunities to disrupt crime and hold offenders accountable, with plenty of tactical flexibility for situational nuance.

ELI EARTH LEAGUE INTERNATIONAL

About **EARTH LEAGUE INTERNATIONAL (ELI)**

Earth League International (ELI) is the only NGO in the world dedicated exclusively to investigating and addressing Environmental Crime Convergence—the intersection of environmental and wildlife crime with other serious transnational crimes, including money laundering, corruption, human trafficking, and drug trafficking.

A pioneer in applying professional intelligence methodologies to environmental crime, ELI identifies and investigates high-level environmental criminals and transnational wildlife trafficking networks worldwide, including how they move their money and their links to transnational organized crime and other serious offenses. ELI works in close collaboration with key government agencies in the United States and internationally.

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