

## REVIEW

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# The political, economic and institutional context of wildlife trafficking networks in Africa and a description of how they operate

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### Abstract

This review follows on from a description of the main transnational organized crime (TOC) ivory trafficking networks published in *Pachyderm* 63. It provides the broader political, economic and institutional contexts in which these networks originated, to advance a deeper understanding of how these TOC trafficking networks are created. The article also describes how the networks are structured along trade chains, from poachers to foreign importers and distributors, and how they operate, presenting case examples from the 1970s in Kenya and comparing them to the Kromah and Xaysavang TOC networks of eastern and southern Africa operating from 2010. The review concludes that state-level corruption has expanded over time, facilitating the operation of these TOC trafficking networks and frustrating their elimination. African nations lose billions of dollars annually to illicit financial flows resulting from various TOC activities which end up in offshore accounts and asset buying. Despite international conventions aimed at stopping corruption and TOCs, the situation is getting worse, not better.

### Résumé

Cet article fait suite à la description des principaux réseaux du crime organisé transnational (COT) spécialisés dans le trafic d'ivoire, qui avait été publiée dans le volume n° 63 de *Pachyderm*. Nous fournissons ici des informations sur les contextes plus larges — politiques, économiques et institutionnels — dans lesquels ces réseaux tirent leur origine, afin de mieux comprendre les fondements de leur création. Nous nous attachons également à détailler la façon dont ces réseaux sont structurés tout au long de la chaîne commerciale, depuis les braconniers jusqu'aux importateurs et distributeurs étrangers, ainsi que leur mode opératoire. Nous nous appuyons sur des exemples concrets des années 1970 au Kenya, en les comparant à l'organisation de COT Kromah and Xaysavang des années 2010 en Afrique australe et de l'Est. Les conclusions de cet article soulignent que le degré de corruption au niveau des États s'est intensifié au fil du temps, facilitant le fonctionnement de ces réseaux et empêchant leur élimination. Les pertes subies par les nations africaines du fait de flux financiers illégaux se comptent par milliards de dollars par an — résultat des diverses activités de ces réseaux et qui finissent dans des comptes offshore et dans l'acquisition d'actifs. Malgré les conventions internationales qui visent à mettre un terme à la corruption et au COT, la situation, loin de s'améliorer, s'aggrave.

## Introduction

In *Pachyderm* 63 the author summarized the main transnational organized crime (TOC)<sup>1</sup> ivory trafficking networks that led to the poaching of tens of thousands of elephants in Africa in recent years, along with thousands of rhinos, pangolins and big cats (Stiles 2022a). In this review, the author will present the broader political, economic and institutional contexts in which these networks originated to advance a deeper understanding of how these TOC trafficking networks are created in the first place. The article will also describe how the networks are structured along trade chains from poachers to foreign importers and distributors and how they operate, presenting case examples.

### *Context of African wildlife trafficking networks*

Illicit economic gain and corruption to obtain it are at the core of organized crime. The ultimate stimulus is the avoidance of laws that are designed to protect the public good, which in the realm of natural resources usually means the prevention of the overexploitation of a given resource. Many wild animal species bear the blessing or curse, depending on the context, of possessing body parts that have an economic demand of some kind in commercial markets. To prevent overexploitation of these natural resources that could lead to local extirpation or even extinction of a species, laws are passed to manage and control the offtake of the body part/product in question, which would usually involve the killing of the animal.

Every nation in Africa has a set of laws and/

or decrees that relate to the use of wildlife, in many instances inherited and amended from the colonial era. These laws typically regulate the hunting or killing of various species of wildlife. Using elephants as an example, range States each have their own set of laws that restrict the legal killing of this animal species and the economic uses of the derivative ivory, meat and other body parts.

When there is a situation in which demand for a product exceeds its legal supply, pressure is naturally exerted by those involved in the trade to increase supply. If this cannot be achieved through adherence to existing laws, the ground is set to increase economic gain through illegal and corrupt acts. What has occurred with ivory is a classic example of this dynamic. Paradoxically, the same state government that created the laws now has government actors who use their powers to abuse those laws.

Every elephant range State has its particular history of who the actors were, but in the past they commonly involved ivory traders (those who first bought the raw ivory), wildlife/game departments (those who sold the ivory), poachers and transporters (these overlap with the preceding), law enforcement and the judiciary (who are corrupted to facilitate and protect the traffickers), and finally political leaders, who abuse their positions of authority to profit from the illegal trade in some way.

Over time an organized criminal network evolves linking suppliers with buyers, exporters, international transporters, importers, processors and distributors to consumers. These networks exist for a large number of wildlife commodities and are flexible and adaptable. Political leaders at the top, if corrupt, are usually involved in a variety of criminal activities aimed at enriching themselves, with wildlife trafficking being just one income stream among many.

The situation with TOC networks involving arms, drugs, human trafficking, wildlife and hardwood timber became so serious that nations came together at the beginning of the current millennium to draft and adopt two international conventions: the United Nations Convention against Corruption (UNCAC) and the United Nations Convention against Transnational Organized Crime (UNTOC) (UNODC 2003a; 2003b). These were intended to clean up and prevent state participation in corruption and organized crime that resulted in losses of billions of dollars annually in illicit financial flows to secret offshore accounts and asset buying.

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<sup>1</sup>Following the UN Convention Against Transnational Organized Crime, organized crime is defined as the actions of a group of three or more persons who operate in a structured way or network and are repeatedly involved in the commission of serious crime for profit. Organized crime becomes transnational in nature if 1) it is committed in more than one State; 2) it is committed in one State, but a substantial part of its planning or perpetration takes place in another State; 3) it is committed in one State, but involves a criminal group that engages in criminal activities in more than one State; 4) it is committed in one State, but has substantial effects in another State. UN General Assembly Resolution 55/25 (November 15, 2000), UN Doc. A/RES/55/25, Annex I, art. 2.

For example, a study of capital flight—the proceeds of corruption and TOC activities—from a representative sample of 30 African countries from 1970 to 2015 estimated that a total of USD 1.8 trillion was lost. This amount greatly exceeded the debt owed by these countries as of 2015 (USD 496.9 billion). Evidence also showed that these countries lost more through capital flight than they received in the form of foreign aid or foreign private investment. In other words, these countries would gain considerably more from stopping corruption and organized crime than from all forms of foreign financial assistance (Ndikumana and Boyce 2018). The World Bank concurs, “Corruption hinders economic development by reducing domestic investment, discouraging foreign direct investment, encouraging overspending in government, and distorting the composition of government spending away from education, health, and infrastructure maintenance towards less efficient but more manipulable public projects.” (Wei 1999).

The UNCAC held its 10<sup>th</sup> Conference of the States Parties in December 2023 in Atlanta, USA. The Global Initiative Against Transnational Organized Crime (GI-TOC) presented a disheartening observation at the COSP.<sup>2</sup> “Since the adoption of the UNCAC, and its sister convention, the UNTOC, the strength of corrupt and criminal networks has grown and evolved beyond recognition. Our 2023 Organized Crime Index shows that the most prevalent and potent group of organized criminal actors are those that are embedded in the state... More than 20 years into the lives of the UNTOC and UNCAC, and as we approach the target achievement date of the Sustainable Development Goals in 2030, the situation is critical and things have gotten worse, not better” (GI-TOC 2023a).

The GI-TOC’s 2023 Organized Crime Index ranks in order the Democratic Republic of the Congo (DRC), Nigeria, South Africa and Kenya as the most criminal countries in Africa, all highly active in illegal ivory and rhino horn trafficking

(GI-TOC 2023b).

In this context, illicit markets for ivory and other wildlife products operate. Between 2006 and 2014 in only a few southern African countries, a study the author carried out with Zimbabwean Rowan Martin estimated that a total of more than USD 727 million worth of ivory and rhino horn alone was lost (Martin and Stiles 2017). If all sub-Saharan African countries were included, the loss would be measured in billions of dollars. Criminal government and private sector actors were the beneficiaries.

### *Structure of Transnational Organized Crime networks*

There are many different ways in which TOC networks can be structured, depending on the type of criminal activity in question (Wyatt et al. 2020; Breuer and Varese 2023). Illicit wildlife trade is the criminal activity of focus here, and the network structure is based on the trade chain, also called the supply or value chain. To demonstrate how different wildlife commodities can vary from one another, rhino horn will be included.

There is a common perception that all ivory and rhino horn entering into illegal trade is obtained through poaching, i.e. illegal killing. In fact, significant proportions of the two commodities under consideration have in recent times originated from a variety of legal sources that subsequently entered the illicit trade chain. These include found tusks or horn from natural mortality, tusks obtained from problem elephant control exercises, pieces not delivered to government storerooms and sold by rangers or wildlife officers, theft or leaks from government stockpiles or private collections, hunting trophies, and horn cut from tranquilized live rhinos. All of these sources can contribute to illegal exports.

Trade chains are structured in levels based on the roles of the actors in obtaining, transporting and trading a given commodity from source, through middlemen to exporters on the supply side, and importers/wholesale traders, intermediaries, distributors, processors, retail vendors and consumers on the demand side. Fig. 1 illustrates the general levels of those actors, for ivory and rhino horn trade on the African supply side, that applies to the three case studies to be described. In any particular trade situation, the levels may vary in personnel composition and nature of the transaction, but the levels can be defined.

<sup>2</sup>GI-TOC is an international civil society organization headquartered in Geneva, with staff and offices around the world, which focuses on research and analysis on all types of illicit markets (Stiles 2021).

Level 1—Comprising the source of the product as supplied by one of various actors, which can be the poacher or poaching gang, stockpile thief, trophy hunter, or rhino horn harvester (or his agent). These players sell or transfer the product to Level 2. An exception is rhino breeders in South Africa. They can sell illegally hunted trophy horns or rhinos they illegally killed, i.e. poached, directly to an exporter with no middleman.

There are basically two types of poachers, independent specialists who self-finance and sell to any buyer they can find, or dependent gangs who are hired and subsidized by what is termed in French *commanditaires*. These ‘commanders’ are Level 2, although the money to finance the hunt could originate higher up the trade chain at Level 3 or even Level 4 (Stiles 2011).

Level 1s are the most numerous and geographically widely distributed in the trade chain. They also tend to be opportunistic and ephemeral, often only supplying the product once or twice. The actor turnover is high.

Level 2—A person usually living in the vicinity of the poaching area and familiar with community leaders and members will purchase the product from the poacher(s). These players are often termed ‘runners’ in southern Africa, ‘brokers’ in East Africa, or ‘commanders’ in francophone Africa (if they have ordered and financed the hunt). They are the first middlemen in the trade chain. The Level 2s might also be small businessmen running a shop or restaurant, a member of law enforcement (ranking local police or wildlife ranger), a military officer, and even a clergyman (priest, pastor, imam).

Level 2s will sell (if they purchased with their own money) or transfer (if money was provided) the product to Level 3. If transferred, the Level 2 will be paid a service fee by the Level 3 (e.g. runners in South Africa). Transporters are indicated in the Facilitator box in Fig. 1. The Level 2 will aggregate products over a limited geographical area from several poaching gangs.

This level is less numerous than Level 1s and they tend to last longer than Level 1s in wildlife trafficking work.

Level 3—This level usually works at the national level and is often based in a large urban area. It may be one person or a partnership between two or more people. They will aggregate

and sell the product to Level 4. They can be termed ‘middleman’ or ‘dealer’. In some instances, this level could be the exporter, and the characteristics would be those described for Level 4 below.

There are relatively few Level 3s in a given country and they tend to specialize in the wildlife products in which they trade. They are often engaged in other businesses or lines of work and usually know influential people in politics, the military and/or business.

Level 4—This person or persons—the level might be a partnership or company—purchases the aggregated product from Level 3 and carries out the illicit packing, paperwork and export of the product in collaboration with clearing and transport company facilitators. Other facilitators can be bribable port officials, customs agents, or law enforcement officers. They may make use of specialist packers who perform what is termed a ‘dragon service’ (EIA 2017), making use of building stones, hollowed out logs, plastic waste, dried fish, etc. to conceal the product. These players will often be based in a city with an international airport or seaport. The horn and ivory can be shipped in containers by sea or air freight, carried by couriers by air in personal luggage or concealed on the body, or sent in packages by courier service or even in the post. Cases of the use of diplomatic bags are even known (Rademeyer 2016). This level would include players who could be called ‘kingpins’, and linked to importers in Asia.

Level 4s are often foreigners, usually eastern Asians, who may have other businesses in the African country of residence (e.g. hotel, restaurant, mining, timber, marine products). They have contacts in the destination countries (e.g. China, Vietnam), sometimes kin-based.

Level 5—As represented in Fig. 1 this level conflates several levels of the trade chain in the importing country. Another series of boxes in reverse could be constructed, made up of the relatively few importers, the wholesaler dealers (middlemen) who buy from the importers and distribute to the workshops or traditional medicine companies that process the products, the retail outlets or online sites that sell finished products, and finally the consumer. These levels are located primarily in the South East or East Asia (for ivory and rhino horn).

Levels 1 to 5 represent what could be termed a ‘network’ in which a trade chain operates. Others have used the terms ‘syndicate’, ‘cartel’ or ‘mafia’, but these terms imply a degree of organization and

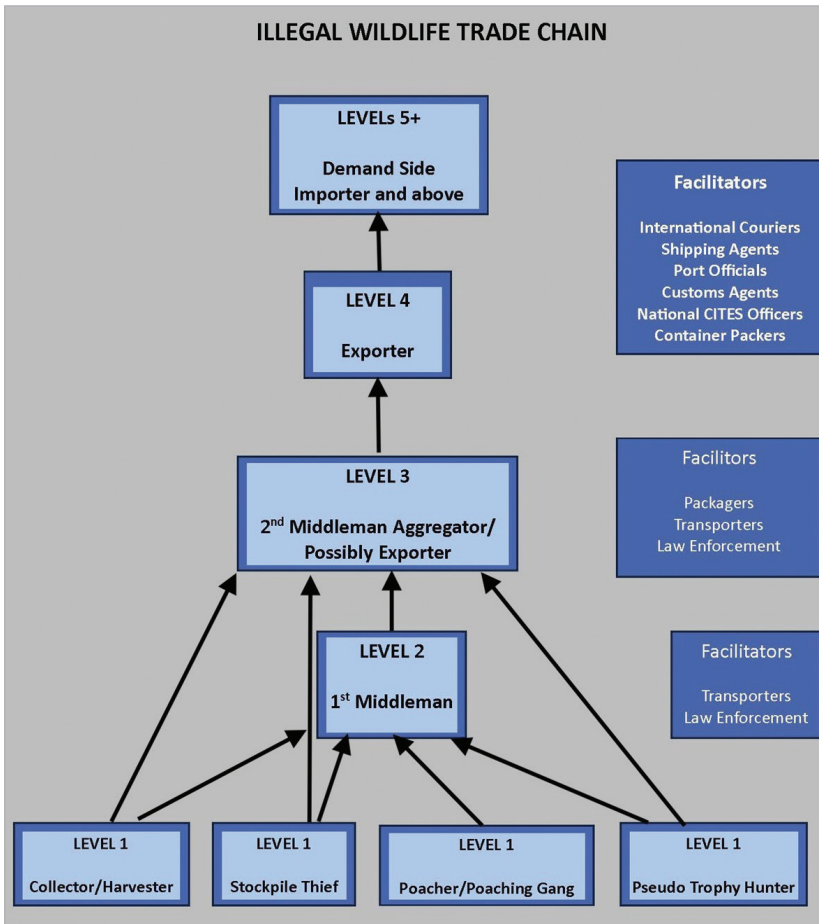


Figure 1. A schematized trade chain for ivory and rhino horn.

management that are generally absent from the flexible, transitory nature of the poaching/trafficking networks. Most often, Level 1 will not even know who the players in Level 3 and above are and vice versa.

**Case study describing context: Kenya in the 1970s**

Exporting ivory and rhino horn from East Africa, and Kenya in particular, was big business from the 19<sup>th</sup> century onwards (Parker 2004; Somerville 2016; 2024). On 31 May 1912, the British colonial government of Kenya decreed its laws concerning ivory:

- "No ivory could be legally possessed except  
 (1) under the Game Laws; and  
 (2) purchased from Government for export."

Tusks could not be sold without a Sale Permit and trading in ivory was barred except for those in possession of a Dealer's Permit, both issued by the Game Department. A complicating factor was that a considerable proportion of available ivory was due to natural mortality (Parker and Graham 2020a). Rural people found dead elephants with tusks in the bush and from precolonial times tradition allowed these tusks to be removed and sold. So, the government created a system of providing a 'porterage fee' to anyone who brought found tusks to the Game Department, typically 10% of the commercial value of ivory. The Chief Game Warden Richard Woosnam observed presciently in 1912 (Parker and Graham 2020a):

*"All we have achieved with the ivory laws is created the illegal ivory trade."*

After World War II, most of the ivory and rhino horn dealers were South Asians (Parker 1974). South

Asians, along with coastal Swahili people (mixed African-Arab populations), also ran many different kinds of shops in both rural and urban areas. It was a simple matter for rural Africans who found tusks, and dead rhinos with horns, to sell them at a higher price to these Asian businessmen, who would in turn sell them to the Asian wildlife traders in Nairobi and Mombasa. The traders had Dealer's Permits and there were ways to manipulate the paperwork to export the product legally with Sales Permits, even though it had not been purchased from the Game Department. The rather more complicated trading situation than presented here can be found in Parker and Graham (2020a; 2020b).

Kenya became independent in 1963 and by about 1970 Kenyan Africans with influence were forming rather cryptic relationships with both the Game Department, now headed by an indigenous Chief Warden, and the Asian wildlife dealers. In 1970 the Game Department began issuing Collector's Permits to certain people connected with influential government individuals who were supposed to collect tusks from elephants that died naturally and receive a reward for turning them in. Rumours of extensive poaching of Kenya's estimated more than 165,000 elephants began to emerge. The collector's permits provided cover for people possessing them to trade in poached ivory (Parker 1974).

Parker (1974) documented huge increases in ivory exports from 1970 onwards in Kenya, coinciding with the issue of collector's permits, or letters issued by the Game Department allowing ivory possession and trade, and the commencement of ivory movement by air freight from Nairobi. Parker also documented unexplained large purchases of ammunition for use by Game Department rangers, suggesting that they were involved in poaching.

The income made from illegal ivory acquisition, which consisted of poached or undeclared found tusks, was distributed throughout the TOC network, with the lion's share going to those at the top, made up of senior Game Department officers and political leaders and their families.

In 1973 the government began attempts to obtain a state monopoly on ivory and corner the market, and in 1974 it banned elephant trophy

hunting and all ivory exports. The international average price of ivory escalated from USD 14.75/kg in 1972 to USD 38.43/kg in 1977, showing the effect of supply uncertainty on overseas buyers (Parker and Graham 2020b). Although not well documented, similar uncertainty of rhino horn exports probably occurred, as average international prices leapt from USD 88.50/kg in 1972 to USD 230.58/kg in 1977 (Parker and Graham 2020b). The CITES Convention came into force in 1975, with African elephants listed in Appendix II and rhinos listed in Appendix I. Of the biggest importers, only Hong Kong was affected from 1976, when the UK joined, as other countries joined the agreement later, so CITES had little effect on the price rises from 1972 to 1977.

The largest ivory exporter was the United Africa Corporation, which continued exporting ivory even after the declared ivory export ban in 1974, including 50 tonnes to China (Tinker 1975). The daughter and wife of a high-office political elite had prominent roles in the ivory trade, the former controlled the United Africa Corporation, and the latter allegedly used a large sum of money generated from illegal enterprises to purchase 21 properties in cash in 1973–1974 in London. She also accumulated vast tracts of land in Kenya and used government power to steal a lucrative gemstone mine from an American investor (Hardin 1987).

In 1977 Kenya banned all hunting and in 1978 banned the possession and sale of any wildlife products, although permits could be obtained for private ownership of wildlife items owned before the 1978 ban.<sup>3</sup>

In terms of the levels in Figure 1, the actors in the 1970s ivory and rhino horn TOC network extending into the 1980s would have been the following:

Level 1—Game Department rangers, poachers and rural people who found natural mortality elephant and rhino carcasses.

Level 2—Game Department officers, who would aggregate tusks or rhino horn found or poached in communal areas or private lands, and Kenyan national park wardens who would aggregate found ivory and rhino horn from protected areas. Both transferred the

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<sup>3</sup>The Convention on International Trade in Endangered Species of Wild Fauna and Flora banned international trade in rhino horn from all five species in 1977, but the Convention's provisions did not come into effect in Kenya until December 1979.

ivory/horn to the Game Department. Those with Collector Permits or Game Department letters authorizing ‘collecting’ and possession would turn the product/s into the Game Department for reward. Much of this came from illegally killed pachyderms (and other wildlife). Asian shopkeepers who illegally bought ivory and rhino horn from poachers in rural areas would sell it on to Asians who held legal dealer’s permits.

Level 3—Kenya Game Department. They aggregated all the ivory and rhino horn from poaching, natural mortality, problem animal control, etc. and sold it on, ostensibly legally, to Level 4s.

Level 4—Those with Dealer and Sales Permits who purchased ivory and rhino horn from the Game Department for export. One of the main Level 4s was the United Africa Corporation.

Up to 1978 in Kenya, the trade chain comprised both legal and illegal ivory and rhino horn. After 1978, all wildlife products exported from Kenya were therefore illegal and were smuggled out. Poaching of pachyderms continued relentlessly and by 1989 Kenya’s elephants were down to an estimated 16,000 (Thouless et al. 2008), a loss of more than 90% of the population from 1970. The number of black rhinos decreased proportionally even more, from an estimated 20,000 in 1970 to an estimated 550 animals in 1984 (Western and Vigne 1985).

A state-controlled wildlife trafficking TOC network came close to wiping out Kenya’s pachyderms in the 1970s and 1980s.

## Case Study 1 illustrating operations—the Kromah Network, 2010–2017

The Kromah TOC network was briefly described in Stiles (2022a). According to a statement made by Moazu Kromah to the Ugandan police after his arrest in 2017 for possession of 1.3 tonnes of ivory, cutting machines and packing materials in his house, he left his birth country of Liberia in 1990 and after a period in a refugee camp in Guinea, he entered Uganda in 1995 from Ariwara, DRC, to Arua, then on to Kampala. These towns, along with nearby Aru, have been active illicit goods smuggling centres for decades, especially

ivory and gold (Vira and Ewing 2014; Titeca 2018).

Kromah probably became involved in ivory and possibly rhino horn trafficking in the north-east DRC in the early 1990s. Apobo (2004) describes in detail how officers in the DRC national army were behind the poaching of large numbers of elephants in north-eastern DRC during this period and into the 2000s. Poached ivory also came from southern Sudan and the Central African Republic. The northern white rhinos (*Ceratotherium simum cottoni*) in Garamba National Park were heavily poached during this period, down to only four survivors by 2005 and by 2008, none were left (Hillman Smith 2018). Most of the illicit products came into Uganda via Aru to Arua, and were then moved to Kampala.

Kromah began working for an influential Malian in Kampala, who smuggled in ivory and diamonds from the DRC (confidential informant-1 (CI-1), pers. comm., 2023). A large West African population of businessmen (mostly from Mali, Guinea and Senegal) developed over the 1990s and 2000s in Uganda. They were mainly traders who dealt in a wide variety of products, including illegal wildlife. They operated out of shops, often in malls, especially Ovino Mall in Kampala, where Kromah had a shop, which supposedly sold shoes (Kromah’s 2017 police statement and CI-1, pers. comm., 2023).

In the late 2000s, Kromah became more independent and built his own TOC network, while remaining in contact with the other West Africans in Uganda. By 2010, it would appear that Kromah’s network was established to traffic ivory from Kampala to both Jomo Kenyatta International Airport in Nairobi and Kilindini Harbour, Mombasa’s seaport, and overseas to eastern Asia (Morris 2010). Between 2010 and 2017 more than 20 seizures of ivory, pangolin scales, and rhino horn were made, linked to Ugandan and/or Kenyan export locations that are believed to have involved Kromah (for many of them, see GI-TOC 2022).

In many of the seizures, the same names were given of clearing and forwarding agents, shipping agents, transport companies, and the same Kenya Revenue Authority agents were involved in multiple cases. Some were arrested, but the prosecution outcomes have been disappointing (Stiles 2022b). In many of the most significant court cases, the same defense lawyers represented the various defendants. This suggests that Kromah and his assistants had put together teams of facilitators in Uganda and Kenya to

traffic wildlife products out of Africa. By 2015, evidence existed that Kromah had collaborators, some West Africans, working for him in Mozambique buying and smuggling out ivory, rhino horn and big cat parts. He was a supplier for South East Asian wildlife dealer companies such as Vixay Keosavang's Xaysavang Trading, Vannasang Trading and Vinasakhone Trading, all based in Laos (Davies and Holmes 2016), and he occasionally travelled to Thailand and Laos to meet with some of them. Loy Chantamvongsa, named as a 'fixer' for the South East Asian TOC network in Davies and Holmes, was Kromah's main contact (CI-2, pers. comm., 2021).

Seized ivory DNA analysis showed that most of Kromah's ivory originated in southern Tanzania, northern Mozambique and Kenya, with some from Zambia and north-east DRC (Wasser et al. 2022). There is no evidence that Kromah's network included Level 1 actors, therefore, he had to buy ivory from Level 2 actors or higher. This suggests that Kromah had at least three suppliers for his ivory: the Yang-Shuidong network (based in Tanzania, after 2015 in Mozambique), the Hsieh-Wang/Lin-Zhang network (based in Malawi) and DRC Congolese suppliers in the north-eastern of the country. Some of Kromah's Guinean relatives and close associates have been arrested for possession of ivory in Kenya and Tanzania, adding credence to the aforementioned (Stiles 2023); and a Ugandan CI told the author that West Africans have purchased ivory and rhino horn from Chinese suppliers in Malawi (CI-1, pers. comm., 2023). Ivory which was stolen from the 87-tonne Burundi government stockpile has been found in at least four seizures associated with Kromah, another source of his ivory (Morris 2021). It is unknown how much ivory remains in the original stockpile, but a Burundian government official is still selling this ivory to a businessman who supplies the Burundian army with food and other goods at prices as low as USD 50 per kg. The government official, in turn, has been selling it on to West Africans at a negotiated markup (CI-1, pers. comm., September 2024). See Milledge and Nuwamanya (2004) for a history of the creation of the Burundi stockpile.

The hypothesized operation of Kromah's TOC network along the trade chain is described below:

1. Kromah operatives purchased wildlife products from the sources named above and transported them to Kampala, where they were packaged and containerized for transport by lorry to Nairobi or Mombasa. Some, mostly raw ivory, was transported from parts of Kenya and Tanzania directly to Mombasa or Nairobi, as many smaller ivory seizures have been made in a wide radius around these cities. Ivory was also leaked from the Burundi government stockpile and transported to Kampala.
2. The ivory and occasionally other illicit wildlife goods were transported in sealed containers by lorry to Nairobi or Mombasa. If the shipment was less than a tonne, it could be transported in an empty water tanker truck (Morris 2014) or another vehicle. In 2014, Feisal Mohammed Ali was arrested and in 2016 convicted of transporting 2.2 tonnes of ivory in a container from Kampala to Mombasa. (In 2018, the conviction was overturned on appeal (Karani 2018)). In 2015, two large seizures were linked to companies owned by the son of another of East Africa's Presidents (Morris 2020).
3. Once in Nairobi, the ivory would be secreted in private houses for repacking in air transport crates. Kromah had corrupt facilitators working at the airport to assist in the loading of the crates onto flights that would eventually end up in eastern Asia. Based on seizures, Turkish and Qatar Airlines were the preferred carriers. Not all of the shipments made it through successfully (e.g. Morris 2010; 2023a). If Mombasa was the destination, the containers would eventually make their way into the port through the efforts of the facilitator team there, which could include repacking into new containers with different cover loads and paperwork. There is evidence that at least one private house was used for aggregating ivory that was probably accumulated from smaller packets of poached tusks from Tanzania and Kenya and transported to Mombasa to be put together into containers for shipping (Morris 2023b). Cover materials for concealment have included dried fish, plastic waste, coffee, tea, hollowed-out logs, timber planks and stones for construction.
4. Whether transported by air or sea, the ivory most often ended up in South East Asia, Hong Kong or China. Malaysia and Singapore were common



transit points where wildlife products would often change ship or plane and assume new shipping documents to conceal the African origin of the cargo, lowering the risk of a seizure. A Malaysian Chinese named Teo Boon Ching was involved in the transit handling of many illicit wildlife shipments before his arrest in 2022 (Anon. 2022). If the destination was South East Asia, the individuals described in Davies and Holmes (2016) and EIA (2018) would receive the product.

5. Once in Asia, the buyers would sell the raw ivory, rhino horn, or other products on to middlemen distributors or directly to workshops that would process the product into retail items for sale to consumers. A middleman ivory and rhino horn distributor in Vietnam is described in WJC (2022a).

## Case Study 2 illustrating the operations of the Xaysavang Network in southern Africa, 2005–present

This case example will focus on rhino horn trafficking in South Africa. The ‘pseudo-hunting’ rhino TOC network operations that were in place from 2003 until 2011 have been inextricably linked to the trade in lions, both live and derivative products, mainly bones (Rademeyer 2016). South Africa differs from most other African countries in that private landowners with secure fencing can own wildlife on their property and have the right to derive income from consumptive utilization, including the killing and sale of live wild animals or their products (Lindsey et al. 2007). The game ranching industry expanded greatly between the late 1960s and 1990s when successive laws gave private landowners ever-expanding utilization rights. Lions and rhinos were first bred on game ranches for the trophy hunting industry (Lindsey et al. 2007) and live sales were made to other ranchers or zoos (Scriven and Eloff 2003). In the early 2000s, newcomers from South East Asia transformed the exploitative business model of South Africa’s commercial wildlife trade.

Tiger bone and rhino horn have a long history of use in eastern Asia in traditional Chinese

medicine (TCM) (Milliken and Shaw 2012). In Vietnam and China, in particular, demand in the early 2000s began to outstrip supply. Tiger bones, with a few exceptions, are indistinguishable from lion bones. It is legal to export hunting trophies for non-commercial purposes from countries where hunting is legal. CITES and national laws of South Africa, South East Asian countries and China permit the export and import of hunting trophies, even of Appendix I rhinos, (limited numbers of Appendix I black rhinos (*Diceros bicornis*) and Appendix II white rhinos (*Ceratotherium simum*), as long as local regulations are respected.

The first of what became known as ‘pseudo-hunts’ took place on a private game ranch in South Africa in 2003, with Vietnamese ‘hunters’. Rhino horn trophies were legally exported with CITES permits to Vietnam to be kept as a trophy by the hunter, but it is suspected that the horns entered the illicit market (Rademeyer 2016). In the same year, a Bangkok fruit seller with ambitions to trade wildlife named Chumlong Lemtongthai met with the brothers Bach Mai (aka Boonchai) and Bach Van Limh, both traffickers. Chumlong knew where to source African rhino horn and South East Asian tiger bone. He began supplying the Bach brothers and later established a relationship with a large Laos animal trading company, Xaysavang Trading, established by Vixay Keosavang in 2002. By 2005, Chumlong was finding it harder to obtain everything he needed in Thailand, and he moved to South Africa, where he became the official representative of Xaysavang Trading (Davies and Holmes 2016).

Chumlong began meeting South African game ranchers who owned lions and rhinos and found a large number of receptive business partners willing to supply him with ‘lion bone sets’ (i.e. the entire skeleton) and ‘hunted’ rhino horn trophies. One, named Marnus Steyl, became a ‘finder’ for Chumlong to locate ranch owners willing to supply the desired products. Chumlong would make formal orders for Steyl to fulfil (Fig. 2).

The rhino horn was supplied—ostensibly legally—through trophy hunting on participating game ranches. Some ranches carried out their own hunts, finding clients who were deceived into believing that they were shooting ‘problem animals’ and told that the horns could not be taken as trophies. Clients paid reduced fees and could only take home photos of themselves with the dead rhino. The horns ended up with Chumlong. Chumlong began to carry out his own



Figure 2. In the above document, an order was sent from Chumlong to Steyl for the procurement of 50 rhino horn sets (front and back horns) and 300 lion bone sets. (ZAR 65,000 equivalent to USD 9,000; ZAR 10,000 equivalent to USD 1,385, 22.08.2011).


hunts, using his Thai associates and even Thai sex workers from Johannesburg to put their names on the hunting permits and CITES export permits. The rhinos were actually shot by professional hunters, but several photos of young Thai women posing as hunters were taken (Rademeyer 2016). The horns were shipped to Thailand with CITES permits (Figs. 3 and 4).

Chumlong continued to supply the Bach brothers, one of whom was based in Nakhon Thanom in north-east Thailand on the Mekong River opposite Laos, and the other in Son Tay in Laos on the border with Vietnam. These illicit products would arrive in Thailand or Laos and be transported to Vietnam, with the assistance of Loy Chantamvongsa. Chumlong also supplied Xaysavang Trading until his arrest in June 2011.

He was sentenced to 40 years in prison in 2012, later reduced to 13 years on appeal. Bach Van Limh allegedly offered USD 600,000 to a key official in Johannesburg to release him, which initially failed (Davies and Holmes 2016), but Chumlong's early release in 2018 suggests that the bribe may eventually have worked.

Chumlong's laptop contained a wealth of documents, videos and photos that incriminated Vixay Keosavang, the Bach brothers, Marnus Steyl and other South African game ranchers, trophy hunters and Thai associates of Chumlong in the illegal shooting of rhinos and the trafficking of their horns. Freeland, an NGO based in Thailand, had been investigating the Bach brothers and Vixay Keosavang for some time and shared their information with the US government. The result was that the US Department of State in late 2013 offered a reward of up to USD 1 million leading to the

PERMIT / CERTIFICATE No. 109739



**CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA**

EXPORT  
 RE-EXPORT  
 IMPORT  
 OTHER

ORIGINAL

2. Valid until: 16/03/2011

3. Importer (name and address)  
**MR. PUNPITAK CHUMCHOM  
 BAN ANOUSOUKXAY PAKSANI DISTRICT  
 BOKHANNONG PROVINCE**

4. Exporter / Registrator (name, address and country)  
**JUAN PACE C/O SANLUI TANDERMEJ  
 1 ARABIAN CRESENT  
 HIGER VALLEI  
 PRETORIA  
 SOUTH AFRICA (ZA)**

5a. Country of import: **LAOS**

5b. Species collection: **INVALID WITHOUT ATTACHED  
 CONDITIONS PG 20FZ  
 MICROCHIP # FRONT: HB680B3430  
 BACK: HB627E7A5E**

6. Name, address, national seal / stamp and country of Management Authority  
**Department of Environmental Affairs  
 Private Bag X447  
 PRETORIA  
 0001  
 SOUTH AFRICA**

7a. Scientific name (Latin and species) AND COMMON NAME OF ANIMAL OR PLANT  
**WHITE RHINO  
 CERATOTHERIUM SIMUM**

7b. Description of specimens, including identifying marks or numbers (applicable if live)  
**HORN 2**

10. Appendix No. and scope (see reverse): **ILW**

11. Quantity (including unit): **2 (TWO)**

11a. Total exported / quota

7a	12. Country of origin*	Permit No.	Date	12a. Country of last re-export	Certificate No.	Date	12b. No. of the operation** or date of acquisition***
A							
B							
C							
D							

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: **SAS: J. D. J.**

**MAFIS/ES**      **17/09/2010**

Place:      Date

15. Bill of Lading (AW) Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export:      Date:      Signature:      Official stamp and title

V & R Printing Works (Pty) Ltd (012) 328-7180 (447)

PERMIT / CERTIFICATE No. 109739

Figure 3. Punpitak Chumchom, aka Peter, was a Thai who assisted Chumlong with the supply of lion bone and rhino horn.

dismantling of the Xaysavang network. Vixay withdrew from wildlife trafficking operations and was replaced by two other Laos companies, Vannaseng Trading and Vinasakhone Trading, mentioned above in the Kromah Network section. Marnus Steyl and others implicated in illegal rhino killing by Chumlong’s laptop evidence were never prosecuted (Rademeyer 2012).

With Chumlong and the pseudo-hunter

operation closed, the Xaysavang Network adapted its operations to begin buying rhino horn from a variety of sources, both in South Africa and Mozambique. Other criminal groups were continuing with pseudo-hunts, such as the Groenewald brothers (Hübschle and Salamanca 2017), Chu Dang Khoa (Rademeyer 2016), Hugo Ras (Rademeyer 2016), and others. Some of the game ranchers with rhinos were also staging poaching incidents, but illicitly selling the horns they

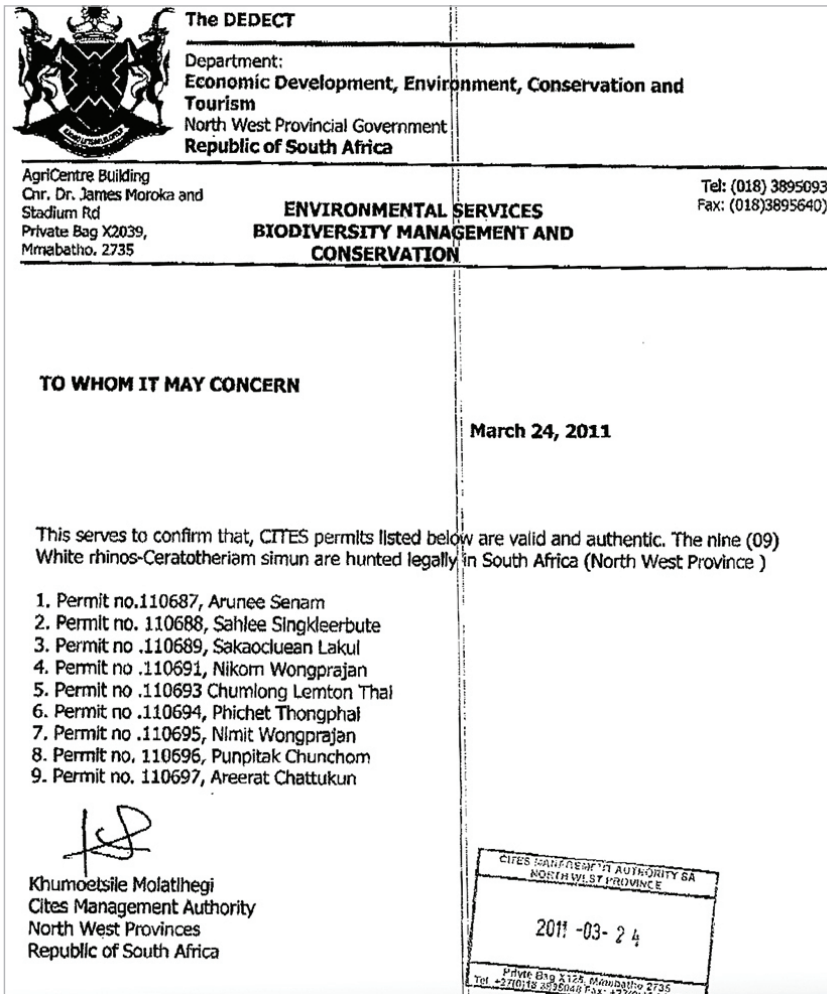


Figure 4. Chumlong also participated in these pseudo-hunting deceptions. Note that there is a second rhino for Punpitak. Nikorn Wongprajan (aka Wongchan) worked at Bangkok’s Suvarnabhumi Airport and is accused of picking up a case containing rhino horn and bypassing a Customs check before passing it on to a Vietnamese courier (Chayutworakan 2017).

claimed poachers had taken. Another source was harvested horns sawn off tranquilized rhinos, operations which were carried out to protect rhinos from being poached, as well as harvesting programmes such as conducted at the Platinum Rhino Project (previously Buffalo Dream Ranch) (AfRSG 2023). These horns were supposed to be microchipped, registered with the RhODIS database and stored away securely (Harper 2011), but a certain proportion were being sold before registration. After South Africa allowed the legal domestic sale of rhino horn in 2017, even some registered horn was sold and exported illicitly (EMS and BAT 2018; WJC 2022b).

Rhino horn was also obtained from rhinos poached in national parks and reserves in South Africa and neighbouring countries. Kruger NP and Hluhluwe-iMfolozi GR in South Africa were the main rhino poaching locations, with notorious Level 2 brokers such as Dumisani Gwala (EIA 2023), Petros ‘Mr Big’ Mabuza, Joseph ‘Big Joe’ Nyalungu and in Mozambique Simon Ernesto Valoi (aka Navara) selling large numbers of horns bought off the poaching gangs to whomever offered the money (EMS 2021; Valoi 2022).

Intelligence sources indicate that at least by 2015, possibly earlier, elements of the Kromah Network began operating in collaboration with the Xaysavang

Network in Mozambique, buying and smuggling rhino horn, ivory and big cat parts to South East Asia. Moazu Kromah and Loy Chantamvongsa travelled to Mozambique several times, and Kromah's sister and other West Africans took up residence in Maputo, Mozambique's capital (Freeland, *in litt.*, 2021), but Nampula was also used to export wildlife products. Teo Boon Ching handled the transport of many of the larger, non-courier shipments from southern Africa as he had for those from eastern Africa (Nuwer 2023).

Rhino horn poached in Kruger NP was often transported through Massingir in Mozambique, where Navara was based, to Maputo. Horn from all other sources, including stockpile thefts and leakages, also appeared in South Africa and Mozambique (EMS 2021; 2024), where the Xaysavang–Kromah network smuggled it to Vietnam, using a variety of air routes and shipping methods, including couriers and unaccompanied luggage. Vietnamese and Chinese traffickers not associated with Xaysavang also operated in South Africa and Mozambique, but due to the clandestine nature of the business, it is not possible to assess their relative importance in exporting wildlife products.

One of the main receivers of illegal rhino horn was the village of Nhi Khe, near Hanoi, in northern Vietnam. By 2014 Nhi Khe had developed into a major processing and marketing centre for products made of rhino horn, ivory and big cat parts. When the Wildlife Justice Commission investigated it in 2014 it estimated that it found products representing 573 rhinos (Stoner et al. 2017). Busloads of Chinese tourists came every day to Nhi Khe to stock up on wildlife products to take home, and several traffickers sold products online from Nhi Khe. Chinese dealers also came to this village to buy ivory items wholesale and smuggled suitcases of trinkets and carvings home to mainland China for illegal sale (Vigne and Martin 2016; 2018). From 2010 to late 2020, when Covid-19 effectively closed down Nhi Khe, horn products from thousands of rhinos must have been sold.

In 2017 Boonchai Bach was arrested at his base in north eastern Thailand, receiving 14 rhino horns in a controlled delivery sting. Corruption delayed his prosecution, but finally he was convicted and sentenced to five years in

prison in September 2022. Boonchai absconded and his whereabouts are still unknown (Nuwer 2023; Steven Galster, pers. comm., June 2023). The Kromah Network was disrupted by the conviction of Kromah and his associates in 2021 and 2022 (Stiles 2022a) and Teo Boon Ching was arrested, prosecuted and sentenced to 18 months in September 2023 in the US (WJC 2023).

Moazu Kromah was released from prison in the US on 1 December 2023 and four others prosecuted with him will be released in 2024 and 2025. Ching will probably be released before the end of 2024. The current status of operations of the Xaysavang network is unknown, but elements of it are no doubt continuing wildlife trafficking. Will it reconstitute itself?

## Discussion

According to the investigations of Parker (1974) and Tinker (1975), in the 1970s there was clearly presidential involvement, and their families and political elites were directly behind the state-sanctioned pachyderm poaching and product trafficking.

For the 2008–2017 'poaching crisis' years that the Kromah and Xaysavang networks were operating, the evidence is less clear of the involvement of a highly organized criminal State. In eastern Africa, there is evidence that points to relatives of Idi Amin, President of Uganda 1971–1979, and the brother of the current Ugandan president being involved in ivory and other trafficking, and of connections to Arua. The brother of the Ugandan president, a former army commander, was specifically implicated in a report by the UN Security Council that he was involved in the illegal exploitation of natural resources, including ivory, from DRC during the 1998 civil war in the east (Anon. 2003). Ugandan troops did not return from the DRC to Uganda until 2003. CI-1 (pers. comm. 2023) alleged that both were involved in trafficking ivory and other illicit products from South Sudan and the DRC to Kampala and using West Africans to export them.

Titeca (2018) states that international West African traffickers in Kampala had high-level government and military connections and that officials in the Uganda Wildlife Authority were also allegedly corrupt and involved in ivory trafficking, mainly from the DRC. Informants told Titeca that Ugandan army soldiers were involved in elephant poaching in the DRC 2008–2012, when they were there chasing the Lord's

Resistance Army, and that army lorries were transporting poached tusks from the DRC to Kampala. However, no direct connection has been established linking the trafficking of the Ugandan army to individuals related to former and current Ugandan presidents.

Titeca (2018) concluded: “My findings, based on the research among illegal ivory traders in Uganda, aimed to unpack the transnational organization of the illegal ivory trade. Empirical understanding ... suggests that a transnational organization—a ‘criminal syndicate’ or ‘gang’ is responsible for this [ivory] trade”.

In Kenya, there are reports linking various relatives of recent presidents to ivory and rhino horn trafficking (Kenya Times 2014; Anon. 2016; Morris 2022; Stiles 2022b), but no allegations of direct presidential involvement. UNODC (2013) concluded that transnational organized crime was involved in ivory trafficking in eastern Africa, but their report did not provide details of the actors involved.

In southern Africa, systemic corruption and State actors linked to wildlife crime have been extensively reported in both South Africa and Mozambique (Rademeyer 2023; Mahadevan and Nelson 2022), but no high-level political leader has been named as directly involved in the trafficking of ivory or rhino horn. In Zimbabwe, however, the wife of the former president was allegedly deeply involved in ivory and rhino horn trafficking (Somerville 2018; Thornycroft 2018). As in eastern Africa, anyone with the right connections or sufficient bribe money—or both—could operate. For example, Dawie Groenewald and associates were arrested in 2010 for rhino horn trafficking. Their trial has been postponed more than 30 times and Groenewald was re-arrested in 2021 while out on bail in possession of 19 illegal rhino horns, but he is still out on bail (Stoltz 2021). Groenewald’s trial has been postponed again until 9 February 2026 (Viljoen 2024).

While progress has been made in identifying and disrupting the operations of TOC networks for wildlife products, there is much more to do. Education for Nature Vietnam states that there are currently at least 14 known ‘kingpins’ behind the trafficking of large amounts of ivory, rhino horns, and pangolin scales into, or through Vietnam and China (ENV 2023).

## Conclusions

From the evidence gathered to date, the biggest difference between the ivory and rhino horn trafficking organization of the 1970s in Kenya compared with the 2010s Kromah and Xaysavang networks is the degree of direct, high-level State control over the operations. In the 1970s, the most senior government officials exerted a higher degree of direct involvement in and control over the supply of ivory (and rhino horn) and its export than existed in the 2010s Kromah and Xaysavang networks, which operated over a much wider area in eastern and southern Africa.

Wildlife trafficking in the current millennium operates within a culture of corruption as the norm. It is fluid and ever adapting, in which anyone with influence and money can traffic wildlife products with impunity. Even if named in the media and prosecuted in the courtroom, those with connections to the right people or with enough money to bribe can stall court cases indefinitely, have them dismissed, be acquitted, or if the international spotlight is too bright, be convicted and pay a court fine to go free. Even if extradited to the US and convicted, the sentences to date have been light.

The UNCAC and UNTOC were created to prevent governments from perpetrating transnational organized crime, but as GI-TOC observed at the UNCAC 10<sup>th</sup> Conference of the States Parties: “... *the situation is critical and things have gotten worse, not better*” (GI-TOC 2023a).

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