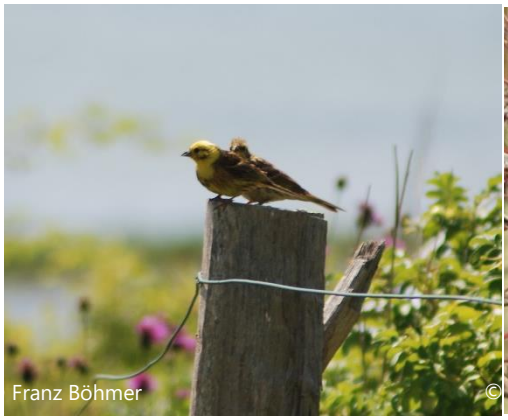
European Union Network for the Implementation and Enforcement of Environmental Law

Good Practices in the Implementation of the EU Action Plan Against Wildlife Trafficking



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Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the EU Member States, acceding and candidate countries of the European Union and EEA countries. The association is registered in Belgium and its legal seat is in Brussels, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 7th Environment Action Programme and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

Information on the IMPEL Network is also available through its website at: www.impel.eu

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Executive Summary

The implementation of the EU Action Plan against Wildlife Trafficking requires broad support, not just from the EU institutions, but also the EU agencies – Europol and Eurojust –, the Member States and their relevant agencies, the EU delegations, Member States Embassies in third countries.

The aim of this IMPEL project is to analyze the different good practices to implement the EU tools to tackle wildlife trafficking and to build an orientation guide that can be shared and used by all Member States.

A general goal of the project is to build a reference guide to a core group of implementing enforcement authorities of the EU Member States that enable them to successfully tackle the problem of wildlife trafficking.

That includes:

- Exchanging solutions concerning implementation problems;
- Facilitating implementation and interpretation of available tools;
- Performing joint inspections;
- Developing web applications;
- Identifying implementation gaps;
- Providing an overview on the approaches in different European countries;
- Facilitating cooperation between actors from the compliance chain, also on defining consistent solutions for implementation problems.

Frontline officers are confronted with different scenarios every day. New and unforeseen problems occur and must be solved in short time. Especially the wildlife trade regulations are complex and not

easy to enforce. Many officers have to deal with such infringements only in rare cases and do not have much experience.

This document may be helpful for these officers but also for more experienced officers and may enable them to identify the relevant cases and to handle such cases properly.

Disclaimer

This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations or the Commission.

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1 THE EU Wildlife Trade Regulations

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7. EU Action Plan against Wildlife Trafficking
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1.1 Introduction

Due to the European Single Market and the absence of systematic border controls within the EU, the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) have to be implemented uniformly in all EU Member States. CITES is implemented in the EU through a set of Regulations known as the EU Wildlife Trade Regulations. Currently these are:

- *Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein* (the **Basic Regulation**).
- *Commission Regulation (EC) No 865/2006* (as amended by Commission Regulation (EC) No 100/2008, Commission Regulation (EU) No 791/2012 and Commission Implementing Regulation (EU) No 792/2012) *laying down detailed rules concerning the implementation of Council Regulation (EC) No 338/97* (the **Implementing Regulation**).
- *Commission Implementing Regulation (EU) No 792/2012 of 23 August 2012 laying down rules for the design of permits, certificates and other documents provided for in Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating the trade therein and amending Regulation (EC) No 865/2006* (the **Permit Regulation**).
- In addition, a **Suspension Regulation** is in place to suspend the introduction into the EU of particular species from certain countries.

In addition to this core legislation, a Commission Recommendation to Member States (Commission Recommendation No 2007/425/EC identifying a set of actions for the enforcement of Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein, commonly referred to as the 'EU Enforcement Action Plan') specifies further the measures that should be taken for enforcement of the EU Wildlife Trade Regulations.


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Although the EU Wildlife Trade Regulations are directly applicable in all EU Member States, the necessary enforcement provisions must be transferred into national legislation (pdf 334KB) and supplemented with national laws, as these are matters that remain under the sovereignty of each Member State. Member States must ensure that infractions are punished in an appropriate manner.

1.2 Basic Regulation

Council Regulation (EC) No 338/97 deals with the protection of species of wild fauna and flora by regulating trade therein. It lays down the provisions for import, export and re-export as well as internal EU trade in specimens of species listed in its four Annexes. It provides for procedures and documents required for such trade (import and export permits, re-export certificates, import notifications and internal trade certificates) and it regulates the movement of live specimens. It also sets out specific requirements for Member States to ensure compliance with the Regulation and to impose adequate sanctions for infringements.

The Regulation also establishes a number of bodies at EU level, i.e. the Committee on Trade in Wild Fauna and Flora, the Scientific Review Group and the Enforcement Group, all of which consist of representatives of the Member States and are convened and chaired by the European Commission.

Species Listed in the Annexes to Council Regulation No 338/97

Council Regulation (EC) No 338/97 covers species listed in its four Annexes:

Annex A includes:

- All CITES Appendix I species, except where EU Member States have entered a reservation
- Some CITES Appendix II and III species, for which the EU has adopted stricter domestic measures
- Some non-CITES species

Annex B includes:

- All other CITES Appendix II species, except where EU Member States have entered a reservation
- Some CITES Appendix III species
- Some non-CITES species
- Lookalike species to CITES Appendix I or II species, that need to be included to effectively monitor the trade in these species listed in the Appendices.

Annex C includes:

- All other CITES Appendix III species, except where EU Member States have entered a reservation

Annex D includes:

- Some CITES Appendix III species for which the EU holds a reservation
- Some non-CITES species in order to be consistent with other EU regulations on the protection of native species, such as the Habitats Directive and the Birds Directive

Amendments to the Annexes of the Basic Regulation

Whenever the list of species listed in the Annexes to Council Regulation (EC) No 338/97 changes, e.g. in order to implement listing decisions of the Conference of the Parties, this is done through a Commission Regulation.

The most recent version of the Annexes is available here.

Nomenclature: for Amphibian species listed unilaterally by the European Union in the Annexes of Council Regulation (EC) No 338/97, and therefore not covered by the Taxonomic Checklist of CITES-listed Amphibians, a Taxonomic Checklist of Amphibian Species not included in the CITES Appendices is available.

1.3 Implementing Regulations

Commission Regulation (EC) No 865/2006 lays down detailed rules for the implementation of Council Regulation (EC) No 338/97 and addresses practical aspects of its implementation. It also implements the bulk of currently applicable recommendations of the Conference of the Parties on the interpretation and implementation of CITES provisions.

It defines additional rules for the issue, validity and use of documents needed for the import, export, re-export and internal EU trade of specimens of species listed in the four Annexes to the Basic Regulation. The standard model forms that must be used for permits, certificates, notifications and applications for these documents, as well as labels for scientific specimens, are contained in Commission Implementing Regulation (EU) No 792/2012.

Other subjects covered by this Regulation include provisions for animals born and bred in captivity, artificially propagated plants, personal and household effects and for the marking and labelling of certain specimens.

Commission Regulation (EC) No 865/2006 is regularly amended. The latest amendment was adopted on 6 February 2019 (2019/220)

1.4 Suspension Regulation

Council Regulation (EC) No 338/97 provides the Commission with the possibility to restrict the introduction of species into the European Union. This is done after consultation with the countries of origin concerned and taking into account any opinion of the Scientific Review Group (for further information please refer to the document 'Differences between the EU and CITES' (pdf 35K).

The most recent Suspension Regulation is available here.

1.5 Guidance documents

The above mentioned EU Wildlife Trade Regulations set out rules governing wildlife trade in the European Union.

Guidance is also necessary to facilitate the application of the EU Wildlife Trade Regulations across the EU on some issues.

- Guidance document on EU regime governing intra-EU trade and re-export of **ivory**
- Guidance on **Worked Specimens** under the EU Wildlife Trade Regulations
- Guidance document on the **verification of legality in timber trade**
- Guidance document on the **Proof of legal acquisition for live animals** of Annex B species and necessary documentary evidence.
- **Guidance document on the export, re-export, import and intra-Union trade of rhinoceros horns** (2019)

1.6 EU Reference Guide on EU Wildlife Trade Regulations

This reference guide was updated in December 2020 and gives a very helpful overview of the current regulations and the implementation and enforcement of these rules. The current version can be found https://ec.europa.eu/environment/cites/legis_refguide_en.htm.

1.7 EU Action Plan against Wildlife Trafficking

On 26 February 2016, the European Commission adopted a **Communication on the EU Action Plan against Wildlife Trafficking** which sets out a comprehensive blueprint for joined-up efforts to fight wildlife crime inside the EU, and for strengthening the EU's role in the global fight against these illegal activities. The plan has three main strands – greater enforcement, better cooperation, and more effective prevention. The Action Plan is to be implemented jointly by the EU (Commission services, EEAS, Europol, Eurojust) and its Member States until 2020. The Action Plan was endorsed through Council conclusions in June 2016.
Read more

1.8 Review of EU Wildlife Trade Regulations

- EU information document in view of a potential revision of EU rules governing trade in hunting trophies in species included in Annex B of Regulation 338/97 (pdf 118Kb) (Español, English, Français)
- Study on the Effectiveness of the EC Wildlife Trade Regulations (pdf 1,54MB)
- Stakeholder meeting 29 September 2008 - Summary report (pdf 1,38MB)

1.9 Differences between EU and CITES Regulations

The EU Wildlife Trade Regulations not only implement the provisions of CITES and the majority of CITES Resolutions, they also go beyond the requirements of the Convention in some respects.
More information about the difference between EU and CITES regulations (pdf 35KB)

1.10 European Union involvement in CITES implementation

The European Union has been fully implementing the Convention since 1 January 1984.

This is partly because of technicalities in the way the Convention was drawn up and how it could apply to the European Union, and also because, as a result of customs union, implementation by individual Member States rather than the European Union as a whole would be at best be ineffective.

Aside from these technical reasons, the adoption of environmental action plans for the European Union and legislation on the protection and conservation of the European Union's indigenous species also made wildlife trade regulations shift from being individual national issues to encompassing the entire European Union.

1.11 Further EU rules

Beside the above mentioned regulations which are directly applicable in all EU member states a number of directives have been published in the recent years dealing with the protection of wildlife. The most important directives are the so called Birds directive (Directive 2009/147/EG) and the Fauna-Flora-Habitats-Directive (Directive 92/43/EEC). Both Directives are directed to the EU member states and need to be implemented in the domestic legislation.

The birds directive which originally was published in 1979 covers all European bird species. Some exemptions are working for such species which are traditionally covered by hunting laws like different goose or duck species. The Fauna-Flora-Habitats-Directive is dealing with numerous plant and animal species except of birds.

The rules with regard to the protection of wildlife are very similar. According to these directives catching, killing and other activities which may harm wild animals and plants covered by these rules are prohibited. In addition to that the possession of such species and the trade in such species is prohibited.

According the Environmental Crime Directive of the EU (Directive 2008/99/EC) each member state should set up clear regulations to punish infringements against these species protection rules but also against the rules of the Basic Regulation No. 338/97 with regards to infringements against the import and export rules and against the rules on commercial activities.

These directive needs to be implemented into the domestic legislation of each member state because the rules on fight against illegal activities and on the punishment of such illegal activities are still under the responsibility and the government of each member state.

Although the Environmental Crime Directive forces each member state to set up some basic regulations but as it is left to each member state how to implement the directive the regulations in the member states are quite diverse.

Furthermore there are two Conventions that all EU member states are signatory to that also include other non-EU countries. Since all EU member states are signatory, these conventions also need to be implemented in domestic legislation. These are:

The Convention on the Conservation of Migratory Species of Wild Animals (CMS), also referred to as the Bonn Convention. This convention was established to protect migrating animals as they cross borders of multiple countries and their protection therefore relies on a collective effort of the different countries they migrate through.

The Convention on the Conservation of European Wildlife and Natural Habitats (CCEWNH), also referred to as the Bern Convention. This convention was established prior to the Fauna-Flora-Habitats-Directive and covers a wider range of countries than just the EU member states and a slightly different range of species. The provisions of this convention have largely been implemented in the Fauna-Flora-Habitats-Directive and Birds Directive.

2 Objectives/Limitations

2.1 Introduction to intelligence

2.1.1 From information to intelligence

Before we can properly discuss and explore information, intelligence and analysis in theoretical and practical terms, we need to have some common understanding as to what these terms mean. Some definitions of these three key terms are as follows:

Information

- Knowledge in raw form

Intelligence

- Information that is capable of being understood
- Information with added value
- Information that has been evaluated in context to its source and reliability

Analysis (of either information or intelligence)

- The resolving or separating of a thing into its component parts
- Ascertainment of those parts
- The tracing of things to their source to discover the general principles behind them
- A table or statement of the results of this process

Understanding properly the difference between these terms and how they interact is important, however even at this early stage, these definitions point to key differences. Information is quite simply raw data of any type, whilst in contrast intelligence is data which has been worked on, given added value or significance.

INFORMATION + EVALUATION = INTELLIGENCE

The way in which this transformation is made is through evaluation, a process of considering the information with regard to its context through its source and reliability.

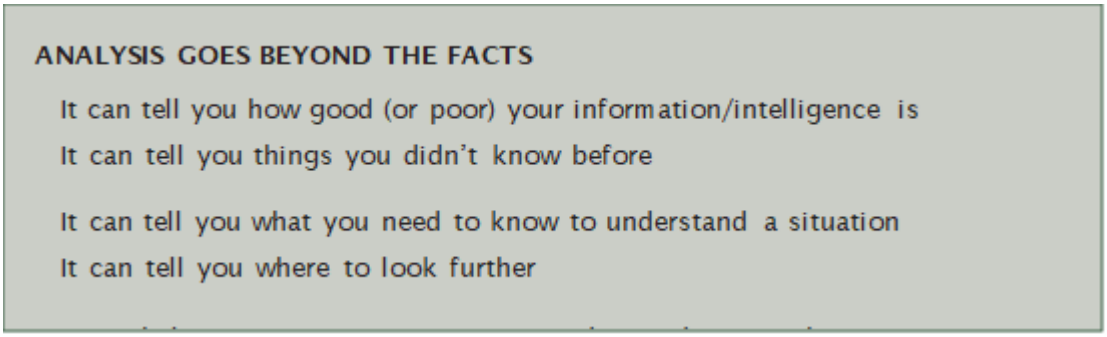
In its simplest form, intelligence analysis is about collecting and utilizing information, evaluating it to process it into intelligence, and then analyzing that intelligence to produce products to support informed decision-making.

All these decisions involve applying our natural ability to "analyze" information, an overall process which can be usefully broken down into a series of stages, or questions we ask of ourselves, as follows:

- What exactly is the problem; what decision do we have to make and why is it significant or important?
- What information do we already have or might we reasonably obtain that could be relevant to the problem in hand. Where is it/how can we get it?
- What meaning can we extract from the information; what does it tell us about what's going on?
- Is there only one possible explanation, or are there other alternatives or options. Are some more likely than others?
- How do these affect the decision we have to make, are some options potentially better than others; do some carry greater risk of success and/or failure?
- Are we ready to take action with a reasonable level of confidence, or do we need to gather more information first? If so, what else do we need and where/how can we get it?

The process of applying these questions, evaluating the answers, and then choosing how to respond, to act, is the essence of what analysis is about.

By bringing this process under our conscious control, we can monitor it, develop and improve it, and subject it to quality checks which can be quite complicated to grasp. Beginning that development of awareness and skill is critical. The practical advantages of developing an individual's analytical skills are many, but can be summarized as follows:



2.1.2 The origins of intelligence analysis

Knowledge has the potential to be equated to power. The concept of collecting and utilizing information to support decision making in some formal, structured way is nothing new. In order to obtain advantage over adversaries, it is imperative to possess the most up-to-date, accurate information regarding amongst other things, their intentions and capabilities. This rule applies in every field, be it politics, business, military strategy, or criminal intelligence. In addition, it is a process that has always been, and still is, continually developing and evolving, in response to changes in social/cultural factors, technology, *organizational* needs, and new/ higher levels of analytical skill.

Reviewing the historical background, the "roots" of intelligence and analysis as a process and as a profession is a useful and important exercise. Raising our understanding of the origins of intelligence and analysis helps us to understand both where we are now and how/why we arrived at this point. It also raises our awareness of how intelligence analysis is a continually changing, evolving practice, which if it is to remain relevant and useful in a practical sense constantly needs a fresh, flexible approach, new ideas, new skills, new techniques. The one constant for the professional intelligence analyst is that no two tasks or projects are ever exactly the same; every new piece of work requires a fresh approach.

There are many examples throughout history of military, religious and community leaders actively tasking individuals with information-gathering exercises and then basing their decisions on the information obtained in this way. Perhaps the earliest recognized text on the subject of information gathering and intelligence-based actions is "The Art of War, The Art of Strategy" written in the 5th Century BC by Sun Tzu, a Chinese mercenary warlord. He was renowned for his ability to command military campaigns whose success owed a lot to his effective information-gathering and intelligence-led decision-making. It says much for the quality of this work that it still remains in print today and is essential reading for military and corporate strategists and intelligence operatives worldwide. From these early beginnings throughout history until relatively recent times, employing information-gatherers for primarily military goals has been a common trend.

What is more, a methodology arose from this process that basically involved direct contact between the information gatherer(s) and the decision-maker, as illustrated on figure 1-1:

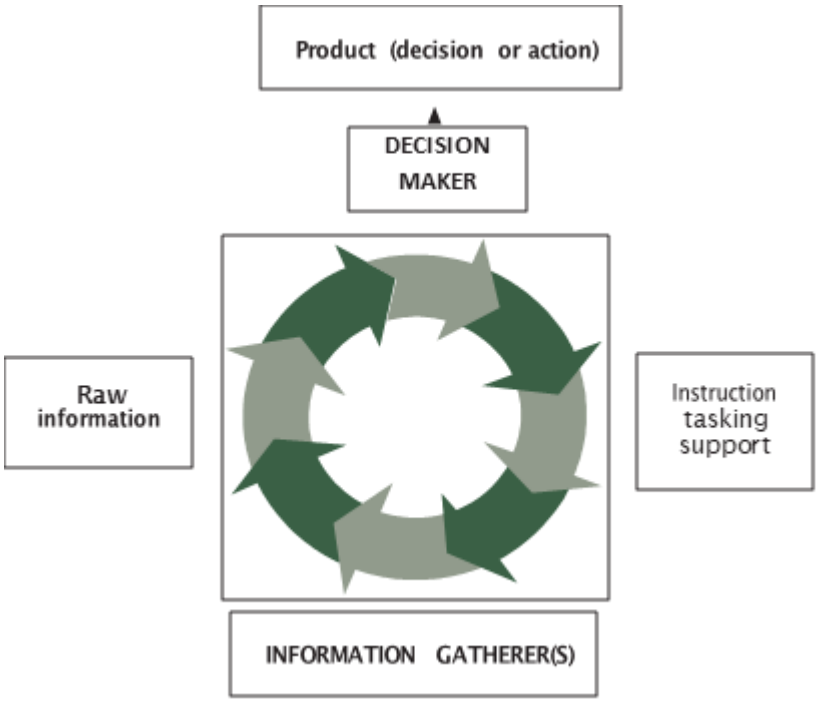


Figure 1-1. Basic tasking model

This method had certain notable features:

1. The sheer logistics involved (no real technology for transport or communication) created a massive time delay between the tasking of the information gatherer, the obtaining of the information, and the delivery of the information to the "end-user".
2. Using information collectors who operated by visiting locations and witnessing events either personally or through intermediaries guaranteed that the information collected would be limited by their senses and their ability to remember accurately what they saw; such information would thus always be highly subjective, and tend towards being based on opinion rather than fact.
3. The volume of information collected in return for such a large investment of time and resources would be extremely small.

Any investigation generates vast amounts of information; the larger the enquiry, the more information the investigator has to deal with. The problem for investigators is that no matter how good the system used to store all this information, they are always limited by their own mental capacity to embrace the information as a whole, to "take it all in" at once.

PARTIAL UNDERSTANDING MUST INCORPORATE A DEGREE OF MISUNDERSTANDING.
MISUNDERSTANDING LEADS TO POOR CONCLUSIONS.

This understanding of the whole of the information is crucial to valid decision-making. Fully understanding a small part of the whole information available means that in fact the investigator only has partial understanding of the whole situation.

It might reasonably be taken as some measure of the importance and value of intelligence and analysis that despite these potentially crippling limitations the process still proved to be a decisive factor in the success of military and political campaigns throughout these times.

Methods in acquiring information changed only slowly throughout history until towards the end of the last century. The massive growth in technology that began then, and still continues today, brought about what has proved to be a massive change in methods of information- gathering, which in turn created a demand for new approaches to analysis and intelligence.

This process began in the late 19th Century with the advent of telegraphy and telephony, which allowed for messages to be sent almost instantaneously over greater and greater distances. At a stroke this removed the resource and time problem that the former methods suffered through their need for the information gatherer to move between source and decision maker. This change carried with it a number of benefits.

Firstly, the "response time" between a decision maker asking for information and receiving the result was vastly reduced; this represented a clear benefit in that it improved the decision makers' ability to react quickly on the basis of such information. In addition, this development also had a knock-on benefit in that there was less

time for the information source to “forget” or “lose” information whilst they were in transit, thus the quality of information also improved. Similarly, the lack of need for the information to be physically carried back to the decision maker created a vast saving in resources; information gatherers were able to spend less time travelling/passing on information, and thus more time collecting information.

The overall result of this change was ironically that these benefits also carried with them a new problem for the decision maker. Much larger quantities of information were gathered, far more quickly than before, and the reaction time for making decisions was reduced. In addition, controlling the process of information-gathering itself became a problem, with a new need for more emphasis on new tasks and orders for information-gatherers created as a result of their new, improved performance. Thus where before the process involved information passing between information gatherer and decision maker, because the new system created an information “overload”, a new problem arose in that the decision maker simply was unable to process all the information received effectively and quickly and then react to it.

2.1.3 The analyst

A necessity arose for the decision maker to return to a situation that enabled speedy interpretation of information and decision-making. This created a need for an intermediate stage between the information gatherer and the decision maker, where the bulk of the information could be received, recorded, evaluated and examined to interpret and extract meaning, before the result of this process was passed to the decision maker.

The core function of the analyst can be broken down into a three-phase process, as follows:

- To gather information, to understand it and the relevance or relationship of each piece to all of the others.
- To develop this information objectively to arrive at an understanding of the whole.
- To communicate this understanding to others and so to put the intelligence process to practical use.

2.1.4 Criminal intelligence analysis

What is “criminal intelligence”? To most people, including criminal investigators, the term conjures up images of collator-style systems used to store and retrieve the information we collect about crime and criminals. As the volume and variety of the information we collect has expanded, we have gradually introduced more and more complex systems to assist with its storage and retrieval. Viewed in this limited context, the introduction of information technology (IT) has been a notable success; the use of IT for the storage and retrieval of crime information is now almost second nature to the operational criminal investigator, and there is no doubt that without these tools, as a service we simply would not be able to cope with the task of recording and collating criminal information.

Collecting information in itself does not result in obtaining intelligence. Information must be properly evaluated before it can be acted upon. The value of criminal intelligence can be enhanced further by analysis.

When available intelligence is too complex and large in volume for simple action, it must be analyzed in order for meaningful results to be obtained.

Currently, insufficient use can be made of the information we collect on crime or criminals to develop real "criminal intelligence", either by intelligence units themselves or by their customers, the operational criminal investigators. Even with all the new systems for storage and easy access to criminal intelligence, investigators can still fail to make real use of this invaluable resource other than as a "ready reference" to the facts unless they properly evaluate this information and use analysts to analyze the intelligence that this process produces.

Criminal intelligence analysis (CIA) is a philosophy which sets out how we can approach the investigation of crime and criminals by using the intelligence and information that we have collected concerning them. It provides techniques that structure our natural deductive powers and thought processes, the "natural intuition", which proficient investigators use subconsciously all the time. It also provides tools that help us to understand the information we collect, and to communicate that understanding to others.

2.1.5 The way forward

The criminal intelligence analyst is every bit as much an investigator of crime as the operational investigator. The key to CIA being of value as an operational tool is that the results of analysis have to be of direct value to the investigation. It follows then that the best results can only be achieved when the analyst and investigator work together in partnership, integral parts of the same team.

In the same way, the analyst and detective need to share many of the same skills needed to be good criminal investigators. The basic problem for intelligence analysts is putting intelligence and information together in an organized way so that the difficult task of extracting meaning from the assembled information is made easier. Only when the proper explanation of what the original information means has been derived can this intelligence be put to practical use. The techniques and systems embodied in this manual are practical tools, which can be of value in any investigation.

2.1.6 Intelligence analysis and organized crime

The advent of criminal intelligence analysis is directly linked to the transformation of individual crime into organized or group crime. The effective use of intelligence is crucial to a law enforcement agency's ability to combat criminal groups. Intelligence analysis also provides the agency with the knowledge required for effective management of its resources. With appropriate tasking, the products of intelligence analysis can assist in developing strategic plans to tackle current problems and prepare for future anticipated ones.

Criminal intelligence analysis permits law enforcement authorities to establish a pro-active response to crime. It enables them to identify and understand criminal groups operating in their areas. Once criminal groups are identified and their habits known, law enforcement authorities may begin to assess current trends in crime

to forecast, and to hamper the development of perceived future criminal activities. Intelligence provides the knowledge on which to base decisions and select appropriate targets for investigation. While the use of criminal intelligence analysis is appropriate to support investigations, surveillance operations and the prosecution of cases, it also provides law enforcement agencies with the ability to effectively manage resources, budget, and meet their responsibility for crime prevention.

At the dawn of the last century, “organized crime” was synonymous with the Cosa Nostra. The picture of organized crime today is quite different. Many of the new criminal groups, with well-developed organizational structures, are established for obtaining power and wealth. These groups include outlaw motorcycle gangs, Russian organized crime, Asian organized crime, African organized crime, drug cartels and a myriad of street gangs—Asian, Korean, Hispanic, black, white supremacy, to name just a few. Levels of complexity are increasing even further with fluid almost structure-less networks evolving, such as West African criminal networks. It should be noted that cooperation between different organized crime groups and networks is commonplace. This also includes the organized wildlife trafficking groups, poachers and transnational organized network on endangered species trafficking/killing.

Criminal organizations are more sophisticated and dynamic than ever before. The challenge for law enforcement is to be prepared for this increasing sophistication in order to reduce the impact of criminal activities on our communities.

In order to accomplish this, law enforcement agencies need forward looking, assertive, and comprehensive strategies to counteract the threat of organized crime groups. Criminal intelligence analysis, when tasked and used effectively, can be a major asset in the law enforcement arsenal. Countries with greater experience within criminal intelligence, such as the United Kingdom, have developed national intelligence models to help standardize how criminal intelligence is used.

Information technology is very much key to intelligence sharing. Particularly in this age of sophisticated multinational crime, including terrorism, a failure to share intelligence and information effectively limits the efforts of all states in combating it.

2.1.7 Intelligence

INTELLIGENCE: KNOWLEDGE (PROCESSED INFORMATION) DESIGNED FOR ACTION

The word intelligence can be used to describe the process of interpreting information to give it a meaning. It has also been used to describe a group or department that gathers or deals with such information or to describe the product of such activity or department. At its simplest, intelligence might be described as processed information. Narrowed down to law enforcement use, “intelligence” could be described as information that is acquired, exploited and protected by the activities of law enforcement institutions to decide upon and support criminal investigations.

Intelligence always involves a degree of interpretation resulting in an inevitable degree of speculation and risk. The amount of speculation and risk is dependent upon the quality and quantity of information. Intelligence is usually divided in two main areas:

Strategic intelligence: Focuses on the long-term aims of law enforcement agencies. It typically reviews current and emerging trends changes in the crime environment, threats to public safety and order, opportunities for controlling action and the development of counter programmes and likely avenues for change to policies, programmes and legislation.

Operational intelligence: Typically provides an investigative team with hypotheses and inferences concerning specific elements of illegal operations of any sort. These will include hypotheses and inferences about specific criminal networks, individuals or groups involved in unlawful activities, discussing their methods, capabilities, vulnerabilities, limitations and intentions that could be used for effective law enforcement action.

A good knowledge of operational intelligence is a highly recommended prerequisite to developing strategic intelligence capability. The development of operational intelligence in itself will provide an important source of intelligence to consider from a strategic perspective.

2.1.8 Intelligence vs. evidence

EVIDENCE: DATA FROM WHICH TO ESTABLISH PROOF

It is important to emphasize that a state's national legislation will dictate the way intelligence can be used for law enforcement purposes. The process of intelligence gathering in relation to a specific investigation is usually a prelude to any evidence gathering phase. Legislation will also dictate whether intelligence material gathered during the course of an investigation is protected from disclosure in criminal proceedings

This part of the investigation responds to reported events and explains what took place and who was involved. Intelligence analysis aids investigations by helping to target available resources and identifying information gaps to focus the investigation more clearly. It also helps to avoid duplication of effort and prevent straying into areas of no relevance. To obtain maximum benefit, an analysis capacity should be employed at the earliest possible stage of an enquiry, preferably at the beginning, although, logistically this is not always possible.

2.1.9 The intelligence cycle

The concept of the intelligence cycle is broadly recognized as the foundation of the intelligence analysis process, at both operational and strategic levels.

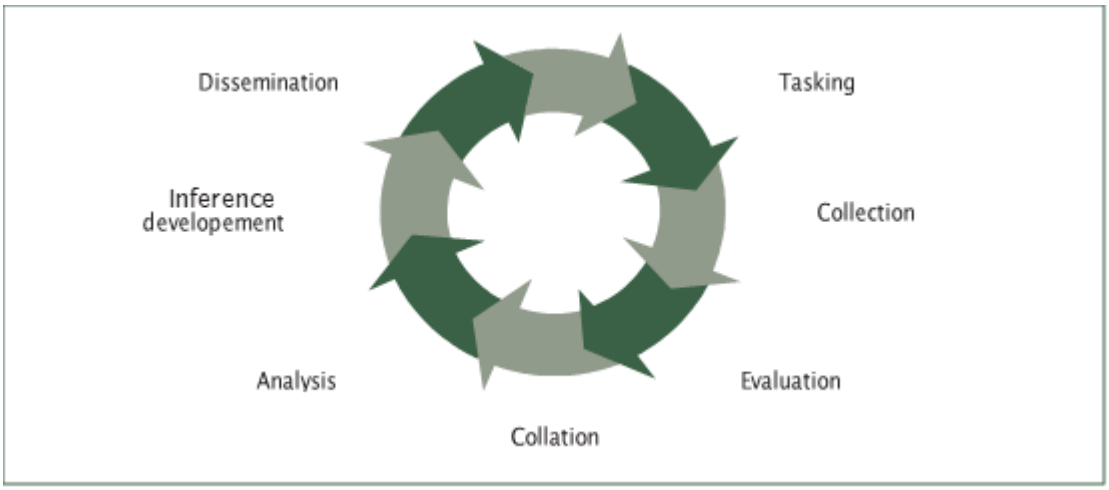


Figure 2-1. The intelligence cycle

2.1.10 Direction/tasking

Intelligence analysis is driven by the needs of decision makers, i.e. consumers of the analytical product. The analytical effort is thus often directed through tasking by these decision makers. They take the initiative at this stage of the cycle, but the principle of partnership requires that both they and the providers share a responsibility for working together to ensure that the requirements for the analytical product are clearly defined and understood by both sides.

The initial questions that have to be asked are:

- Who tasks?
- How do they task?
- Why do they task?
- What tasks are set?

In general, these questions will be answered within the environment in which the analyst sits and therefore no hard and fast rules can be given in this respect. It is essential that a good decision maker/analyst relationship exists in order for tasking to function effectively. The analyst must be objective, not influenced by preconceived ideas, but at the same time willing to accept the task without prejudice.

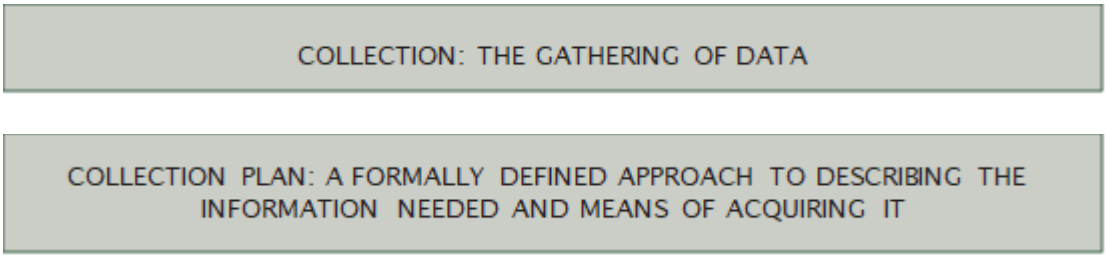
Tasking can take two basic forms:

- The decision maker expresses a requirement for an analytical product focusing on a subject or a range of subjects of concern.
- The decision maker formulates a general expectation for the analytical provider regarding an area of risk, threat or opportunity.

After the task has been clearly defined, the analytical unit commences its own planning for the remaining phases of the intelligence cycle.

2.1.11 Collection

The intelligence process relies on the ability to obtain and use data. However, the first and most basic problem to overcome lies with the collection and storage of this data which comes in many forms, from electronically retrievable to "hard copy".



Care must be taken at this early stage to avoid data overload which is always a problem for any agency, but data ignored because the provider believed it not to be relevant can cause problems later on.

The issue of planning all the activities in the intelligence process is particularly significant in the collection phase. In both operational and strategic intelligence analysis the topics and the scope of the analysis should be clear before considering further actions to be undertaken. A collection plan in which the information needed is identified, and the means of acquiring it are laid out, is imperative to ensure the orderly and precise collection of relevant information.

The collection plan should include the information categories that are important to the analysis, the specific data items needed to do the analysis, possible sources of information and sources to be contacted with specific requests, and a schedule to indicate when the information was requested and when it is needed by. In order to avoid "chaos", a structured collection plan approach where the analyst is proactive, imaginative and explores all avenues to gain information is vital.

The three main types of sources of information are open, closed and classified:

- *Open source (OSINT)* is information that is publicly available. One very notable subset of open-source information is so called "grey literature". It can consist of research, technical, economic reports, "white papers", conference documentation, dissertations and theses, discussion papers, subject-related

newsletters, etc. One of the main difficulties in working with this type of source is evaluation as information available in the public domain can frequently be biased, inaccurate or sensationalized.

- *Closed source* is information collected for a specific purpose with limited access and availability to the general public. Closed source information is often found in the form of structured databases. In the context of criminal intelligence analysis, these databases will largely include personal data collected as part of ongoing targeting operations, or broader criminal records, vehicle registration data, weapons licensing, etc.
- *Classified* is information collected by specifically tasked covert means including use of human and technical (image and signals intelligence) resources. Use of classified information can significantly enhance the quality of an analytical product, as it is usually highly accurate; however, it can also make an analytical product significantly less actionable due to restrictions on dissemination.

The intelligence analyst must become an all-source analyst, i.e. selecting information sources for their relevance for the project rather than for availability or ease of access. An all-source analyst must avoid becoming a victim of a traditional concept that only closed or classified data sources are useful and contain valid and relevant data. The use of open sources often gives additional credibility to the final product or triggers off collection of further closed or classified information.

Selection of sources can also be regarded from the angle of cost effectiveness. Use of open sources instead of deploying expensive covert assets may significantly reduce the budget for a collection exercise, or alternatively, permit the acquisition of more information within an established budget. Use of open sources can also help protect or conserve sources of closed and classified information. At the same time, as exploration of open sources often requires handling extremely large data volumes, an analyst involved in OSINT should receive specialist training in the subject or be supported by an OSINT expert.

The ultimate objective of an operational intelligence analyst is to bring about the arrest of the criminal(s) under investigation and/or the disruption of a criminal group's activities. The aim of the team should therefore be to develop the most useful sources and collect the information most likely to produce successful results. A common starting point is to identify the criminal's associates—however, the objective should always be to identify relationships between individuals and their roles in the criminal activities, rather than identifying associates for their own sake.

A major issue in a collection exercise is the language of the source. Intelligence analysis is particularly appropriate for investigations of organized crime activities, which very often have a cross-border dimension. Exclusion of information (including open source information) purely on the basis of language can have a seriously damaging effect on the quality of an analytical product. Language training of analysts is one solution. Use of translation software is another.

An intelligence collection plan may contain the following elements:

- *Problem definition*—the intelligence problem needs to be precisely and clearly formulated
- *Project aim*—ideally a one-sentence definition of an intelligence requirement

- *Project scope*—it expands the definition of the project aim and sets out the actions expected from the analyst. It also contains a detailed description of the scope and purpose of collection measures and sources.

2.1.12 Evaluation

The validity of an inference is directly linked to the quality of the data behind the inference. Thus, data evaluation is a key element of the intelligence cycle. It should be conducted simultaneously with or immediately after its acquisition, to ensure that the evaluation takes place within the context in which information had been acquired (as it is difficult to evaluate information that has not been submitted correctly within a local environment). Evaluation requires a separate assessment of the reliability of the source (the provider of the information) and validity and accuracy of the information.

EVALUATION: AN ASSESSMENT OF THE RELIABILITY OF THE SOURCE AND THE QUALITY OF THE INFORMATION

The source and the actual information must be evaluated independently of each other and therefore it is imperative that the person completing the report has a sound knowledge of the evaluation system.

2.1.13 Collation

COLLATION: THE ORGANIZATION OF THE DATA COLLECTED INTO A FORMAT FROM WHICH IT CAN BE RETREIVED AND ANALYSED

Collation is transfer of collected information and/or intelligence into a storage system (be it a filing cabinet or a computerized data base) in a structured (indexed, cross-referenced) format that permits rapid and accurate access. It is not equivalent to bulk filing of every bit of information or document acquired during collection. Irrelevant, incorrect and otherwise useless information is weeded out.

2.1.14 Data integration and analysis

ANALYSIS: THE CAREFUL EXAMINATION OF INFORMATION TO DISCOVERS ITS MEANING AND ESSENTIAL FEATURES

The analysis stage of the intelligence process is a key one. Analysis can be described as in-depth examination of the meaning and essential features of available information. Analysis highlights information gaps, strengths, weaknesses and suggests ways forward.

The analytical process is aimed at the use and development of intelligence to direct law enforcement objectives, both for short-term operational aims and for long-term strategic reasons. The scope of analysis and its overall credibility depends on the level and accuracy of acquired information, combined with the skills of the analyst. Analysis is a cyclical process, which can be performed to assist with all types of law enforcement objectives. Different types of crimes and criminal operations require different scenarios, but in all cases the information used should not be pre-filtered through an artificially and arbitrarily imposed selective grid.

Data integration is the first phase of the analytical process. It involves combining information from different sources in preparation for the formulation of inferences. Various techniques may be used to display this information, the most common being the use of charting techniques.

- *Link charting*—to show relationships among entities featuring in the investigation
- *Event charting*—to show chronological relationships among entities or sequences of events
- *Commodity flow charting*—to explore the movement of money, narcotics, stolen goods or other commodities
- *Activity charting*—to identify activities involved in a criminal operation
- *Financial profiling*—to identify concealed income of individuals or business entities and to identify indicators of economic crime
- *Frequency charting*—to organize, summarize and interpret quantitative information
- *Data correlation*—to illustrate relationships between different variables

The next step in the analytical process is interpretation or logical reasoning, which requires going beyond the facts. The disciplined approach to analysis requires the maximum amount of information to be assessed at the time of integration to determine its relevance. Excluding information at the beginning of the process can easily lead to the significance of a vital piece of information being overlooked. This can lead to incorrect analysis, which can ultimately jeopardize an enquiry.

Analysis often identifies additional projects that are tangential to the original one. In the past, it was usual to undertake these projects simultaneously and in conjunction with the main one. This approach led to dispersing of resources, delays and overall lower quality of the final product(s). Through experience, it has now become accepted that analytical projects should be undertaken sequentially, one at a time, or by independent teams of analysts.

Data description and integration techniques, like link analysis, are not an end in themselves. They are simply tools used by analysts in the process of deriving meaning from information. The first truly analytical product is an inference. An inference comes from the premises—one common mistake is to intuitively develop an inference and then look for premises that would support it. This emphasis on the primacy of premises should be reiterated by means of a statement such as “the premises that led me to my inference are…” and not “the premises supporting my inference are…” (When presenting results, however, the starting point is the inference—the big idea—followed then by premises from which it came).

A “premise” in inference development is used to identify facts or pieces of information that go together to make a particular point. Premises are the first and key stage in the true process of data analysis as against data description. Understanding how premises are identified is crucial to developing inferences.

Premises are the closest link to the described information, and thus are the most objective and accurate representation of data. For any given set of premises derived from a particular set of information, the premises may be combined in different ways to suggest different inferences.

There are four types of inferences:

- *Hypothesis*—a tentative explanation, a theory that requires additional information for confirmation or rejection.
- *Prediction*—an inference about something that will happen in the future.
- *Estimation*—an inference made about the whole from a sample, typically quantitative in nature.
- *Conclusion*—an explanation that is well supported.

It should be noted that all inferences require testing in some manner before they can be accepted as fact.

2.1.15 Dissemination

DISSEMINATION: THE RELEASE OF THE RESULTS OF ANALYSIS TO THE DECISION MAKER

An intelligence analyst has the responsibility of disseminating analytical products to targeted audiences, as appropriate. Much of the routine dissemination may be conducted by way of short notes. But intelligence analysts should be able to give oral briefings on larger investigations and write structured reports detailing the currently available information.

Throughout the whole process the decision maker will have been in close consultation with the analyst, and would have been asked on numerous occasions to answer questions relating to the particular project.

The dissemination process can take various forms, such as:

- Structured formalized reports
- A structured and formal oral presentations with supporting documentation
- Weekly overviews in the form of bulletins
- Ad-hoc briefing to intelligence and investigative teams

The dissemination phase completes the initial cycle of the intelligence process.

2.1.16 Re-evaluation

Re-evaluation involves a continual review of the whole intelligence cycle to identify ways in which any stage of the cycle can be improved. To be of most value, re-evaluation should occur throughout the process, not merely be left to the last stage of the cycle. Re-evaluation can be directed at:

- Process
- Analytical product
- Use of the analytical product
- Effectiveness of reporting
- Analyst's perspective
- Decision maker's perspective

2.2 Building the Picture.

Officers in charge of investigations related to the illegal trade in birds can be confronted with different scenarios. In general two major scenarios can be distinguished.

a. Activities related to breeder/keeper/trader
b. Activities because of the suspicion of illegal catching and killing
c. Activities concerning international trafficking.

2.2.1 Scenario a)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In many cases you may go out for an inspection of a known breeder or keeper. In such cases you may be aware of most species kept but often you may find unexpected species and unexpected numbers of birds. When inspecting a breeder, the focus should be on the availability of a legal breeding stock and the acceptable number of potential offspring. It is nearly impossible to check the parentship just on the spot. Consequently, in the case of suspicion the taking of samples for the respective analysis must be prepared.

You may not only find birds bred by the person involved but also animals bred by others or imported or of unknown sources. Such problems cannot be solved immediately. Therefore, you may take actions to secure the birds and all the relevant information.

Last but not least the check of the marking of the birds is essential. Manipulations of closed rings are known and can be found. It will not cause many problems to manipulate rings especially if the rings are made of aluminum and if the rings are used to mark small birds. As larger the birds are and as stronger the used ring material is as more complicated the manipulation will be.

Having identified irregularities, you may have to decide about the seizure of the birds. Such seizure may consequently lead to the question where to place the seized birds. To release the birds with the current holder might be an option which should be chosen in very single cases only. If you decide to take away the birds you have to have persons who are able to handle the birds and who are able to house the birds. Such birds should always be housed separately due to different reasons f. e. because of infectious diseases.


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2.2.2 Scenario b)

When dealing with the illegal catching and/or killing of birds you have to be aware of a general problem. In most cases you may find the caught or killed animals but you cannot find the perpetrator. Getting such a person „red handed“ might be possible but this will be a very rare and lucky situation. Mostly the persons involved will not be available at the crime scene. Therefore, identifying such a crime you have to focus on the saving of evidence to keep the chance to find the persons behind.

You may find nets, traps, lime sticks and other tools to catch birds. Such items should be taken out of the wild to prevent the damaging and killing of other animals. You also may find birds caught with such materials. In these cases, the birds will be heavily injured because of the method how birds will be caught. Lime sticks may damage the feather and traps may break the legs of the birds. Depending on how long the birds will be caught such birds will be exhausted and need immediate care.

You also may find dead birds killed because of unknown reasons or methods. In such cases forensics like x-ray or chemical analysis might be necessary to identify the way how the animals were killed. Birds will be killed mostly by shots or by poison.

Such dead birds need to be handled carefully taking care especially for your own health and safety. In addition, looking around the scene might result in more victims.

Many different species can be found. Nets and lime sticks are mostly used to catch small song birds especially for keeping them as pets but also for food purposes. In many countries especially birds of prey are the victims of illegal killing.

2.2.3 Case Study a)

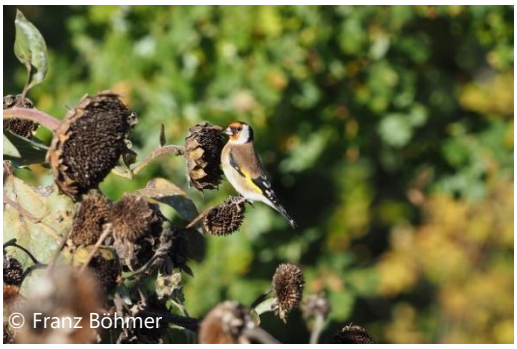
A regional German authority became aware of the trade in European Songbirds and suspicion of illegal trade in such birds. A known bird trader offered such birds regularly on different platforms but he also used larger or smaller bird fairs in Germany and the neighboring countries to sell and acquire such birds.

Because of different reasons like number of traded birds and sold species etc. the regional authority applied for a house search and the public prosecutor agreed after having checked the relevant details and the legal framework.

When carrying out the house search the authorities identified more than 400 birds of different European bird species. At least more than 100 were not marked. No acceptable proof of legal acquisition could be presented for all the birds identified.

More than 300 rings have been checked carefully. At least more than 270 rings showed marks of manipulations. Only a small number of rings did not show any mark of ring manipulation but also some of these rings did not match the ring size given in the regulation.

Most of the birds belonged to very common species like *Carduelis spinus, Carduelis carduelis, Carduelis flammea, Carduelis cannabina* or *Pyrrhula pyrrhula.*
Just such species will be checked less carefully by the authorities than more rare species.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According to further investigation many of the birds were acquired in EU countries like Belgium, Czech Republic, the Netherlands or France.

In most cases of manipulation, the rings have been widened by conical tools to increase the inner diameter of the ring. Such wider rings can be placed on the legs of subadult or adult birds. After placement of the ring on the leg the ring will be pressed with plyers to prevent the loss of the ring.

Meanwhile the case was closed and the persons involved have been sentenced to imprisonment on probation.

This case but also comparable cases in other EU member states show clearly that there is a large demand for such birds in many EU countries. It seems to be clear also that this demand cannot be satisfied by animals legally bred in captivity completely and that there is a need for catching such birds for pet trade.

2.2.4. Cases Study b)

Import of live birds in the European Union is regulated by Veterinary and Wildlife protection rules. Due to the outbreak of Avian Influenza, Regulation 139/2013 initially established stricter domestic rules for wild birds, which importation was limited to personal pets, up to five per passenger, and for commercial consignments only to those with facilities approved in the country of origin by the EU. Regulation 338/97 and 865/2006 establishes conditions for trade of protected species of fauna and flora. Afterwards, imports plummeted causing the demand of exotic birds unattended. The new situation fueled the captive breeding operations within the domestic market in the pet trade sector, while some decided to search into the illegal trade.

On 2016-2017 Spanish Enforcement Police launched an operation against international live bird trafficking.

At Madrid's airport, a random X-ray control of check-in luggage of a person coming from Senegal, found out a batch of birds, none of them protected, at a Spanish border point, on an attempt to smuggle them into the EU market.

Cooperation with and NGO working on the field (Eagle Senegal) was helpful to the afterwards investigation.

Madrid, April 4th 2016, 270 heads seized of the species *Uraeginthus bengalus*, *Serinus mozambicus* and *Amadina fasciata*. All were taken to a nearby quarantine of a Rescue Center for exotic animals. None were CITES listed.

Soon after the seizure, a meeting to exchange information and work out a possible operation was launched among Customs, Enforcement Police Head Quarters and the CITES Management Authority:

- Alert sent to all CITES Offices at the main Border Points,
- Internet search for similar deeds happening in third countries,
- Intelligence gathering by Enforcement Officers on the persons,
- Search in specialized web pages of offer/demand on bird fairs of the species seized.

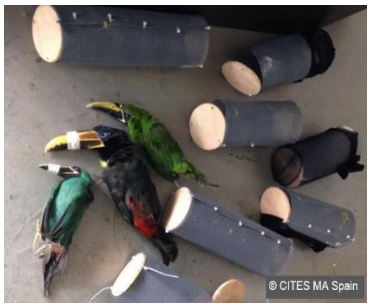
Findings:

1. - Previous records found after an internet search in the media:

Ecuador (February 16th, 2016): two Spaniards were indicted on an attempt to smuggling 10 live birds of the species *Rupicola peruviana*, Annex B listed (estimated price 50,000 euros in the EU market).

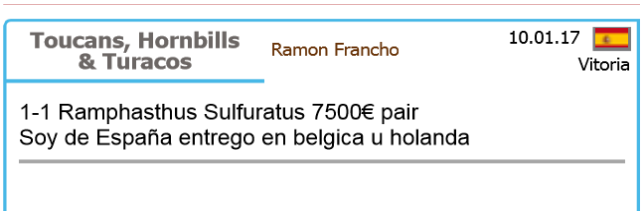
2. - Seizures achieved during the investigation process:

Peru (April 20th, 2016): seized on arrival at Spain, live birds in checked in luggage, of the species *Pteroglossus viridis* (CITES protected), *Aulacorhynchus prasinus dimidiatus* (non listed) and *Tangara* and *Euphonia* species. A total of 45 birds with a death toll of around 50%, an estimated value in the EU market around 23,000 euros.



Mexico: live toucans and other non-CITES listed birds seized at Barajas Airport. Mexican authorities were informed and coordination among enforcement police aimed to chase the syndicate behind.

Belgium and Netherlands: wild source bird traffic is found in advertisements of specialized webpages. Information exchange of species concerned and persons involved is undertaken among authorities.



("*I'm from Spain, deliver in Belgium or The Netherlands*")

Argentina: June 2016, seized in Argentina at the airport, with destination Spain. June 9th, Species protected by CITES and non-listed, *Ramphastos toco*, *Paroaria coronata*, *Gubernatrix cristata*, *Amblyramphus holosericeus*, a total of 126 birds.

Uruguay: July 2017, seized at Barajas Airport – Spain, 4 hummingbirds among others.

Mexico: February 2017, seized at Barajas Airport – Spain. *Ramphastos sulphuratus* (4), *Pteroglosus torquatus* (3), *Cardinalis cardinalis* (29), *Passerina ciris* and *P. cyanea* (19).

Peru: December 2016, seized by SERFOR as Enforcement Authority at Airport Jorge Chávez, none listed in CITES Regulations. Six quetzals (*Pharomachrus pavoninus*), twelve *Tangara* sp., five *Euphonia laniirostris* and two toucans of the species *Semmornis ramphastinus* (from Ecuador).

During the operation, several illegal shipments were detected, successful control deliveries achieved, gathered intelligence on the mules, consignees, trips, “modus operandi”, etc., all set up for action day, with a total of three premises checked, a large number of birds seized, and acquisition of digital data from cell phones, PCs, etc.

Since the end of the operation, there has been no other similar seizure of this kind at the Spanish borders, considered the syndicate disrupted and acting as a strong deterrent against illegal trade of live wild birds.

2.3 Target groups

The EU acts as a single market. Since this market consists of 27 separate member states it is probably the most diverse market in both the legal and illegal wildlife trade. There is great cultural diversity between the different member states and this results in different traditions and views on hunting, entertainment, conservation and pet keeping and different use of plants, animals and derived products as food sources, traditional medicine, ornaments, cosmetics, art, musical instruments, clothing, furniture, company etcetera. This cultural diversity is reflected by the trade in wildlife commodities.

Several member states also have historical and recent connections with other countries through past colonization and trade and some still govern overseas territories. These connections, the possibilities of communication in the same language and back and forth migration of people between these countries, territories and member states has also greatly contributed to the diversity of wildlife commodities traded to, from and within the EU. Last but not least, there is a plethora of migrant communities within the EU with their own (sub-)cultures and associated use of wildlife commodities.

It is difficult to pinpoint what illegal wildlife commodities traded within, to and from the EU are of most concern and should receive enforcement priority. This really differs from one member state to the next and each member state should assess for themselves what the relevant commodities are. This can be done by analyzing data on imports, exports and re-exports provided by the national CITES Management Authority or by the CITES Trade database, complemented with data from inspections, checks and criminal investigations and the offenses these exposed. Good collaboration between the different enforcement authorities within a country and on the

different levels of government is crucial for this. Data from the EC, the EU-TWIX database, transnational agencies like IMPEL, INTERPOL and EUROPOL, non-government organizations and scientific research can all contribute to assessing which form of illegal wildlife trade should be addressed within a member state.

It is also important to realize that once enforcement focusses on specific commodities in one country, traders will shift their imports, exports and sometimes even operations abroad to remain undetected by authorities. Therefore, it is crucial to seek cooperation with other member states involved in the trade chain.

Last but not least member states should also be aware of the limitations in enforcement systems and operations they use. Customs operations for example can be designed in such a way that wildlife crime is not even noticed: a product may already be seized or destroyed because it did not comply with other legislation, like for example that on the import of medicines and food products. The focus might be diverted away from wildlife crime, while wildlife crime might in some of these cases even be the more serious offense. The same can apply to the systems and operations of other enforcement agencies, so it is imperative to understand how these systems and operations work and where the blind spots may be.

3 – Available Tools

Technical tools (microchip readers/transport cages/capture material...)
Camera, flashlight, magnifying glass, phone with applications, own safety package like face mask etc.,

Checklists:

- Inspection sheets

ID Tools

- Identification guides (CITES)
- Identification techniques

List of ID experts

Handling animals

- Training in handling
- Restriction techniques

Rescue centers

Forensic techniques available

- DNA Sampling (species identification)
- DNA Parentage Research
- Isotope analysis
- Covert marking and tracing materials

Investigative techniques

- Online monitoring
- Electronic Data Processing (EDP) Audit
- Financial Investigation

Accredited laboratories

Costs

- dna test, zoo hotel, etc

Other authorities which might be involved

- veterinary services
- police

3.1 Inspection Tools

Commonly inspection authorities encounter difficulties carrying out inspections of facilities where fauna and flora are housed, such as breeders, commercial stores and fairs and markets. The difficulty in identifying the species and the verification of the respective documents makes the inspection work extremely technical. These difficulties sometimes divert inspectors' attention to some details that are important to consider during an inspection.

Preparatory work is important, so that the inspection can proceed in the best way, as the reports of previous inspections or the list of specimens registered with the management authority. Thus, the inspectors' work is facilitated by the available prior information.

The success of an inspection also depends on the report produced so that the authorities can have a perspective on the evolution of the inspected.

This document is intended to be a supporting tool to inspections of breeders and keepers of fauna and flora.

Inspection actions are reported on the respective forms, thus allowing inspectors to report all situations detected during the inspection.

The inspection sheets are ordered by A, B, C and D, in annex of this document. The last one has a form that allows you to calculate a score, which will allow you to measure the degree of success of the inspection. Sheet D also has a guideline that comprehensively explains how to complete the form in order to obtain the final score.

4. Closing remarks

Frontline officers will be confronted with different scenarios every day. New and unforeseen problems will occur and must be solved in short time. Especially the wildlife trade regulations are complex and not easy to enforce. Many officers have to deal with such infringements only in rare cases and do not have much experience.

This document may be helpful for these officers but also for more experienced officers and may enable them to identify the relevant cases and to handle such cases properly.

The time pressure will be huge because in many cases officers have to deal with live animals. In such cases animal welfare must be taken into account and solutions especially with regard to the placement and housing of seized animals must be taken very fast. This problem must be solved on a case by case basis but the knowledge about institutions and organization which are able to help is essential.

The document can not cover and solve all questions but any suggestions how to develop the document are highly welcome. Many persons have a lot of experience and their input could be valuable for the improvement of the document. Finally the success in such cases is build on the three pillars communication, cooperation and coordination but not only on a regional level but also on national and international level.

Hopefully this document will give you some ideas how to identify and handle cases of illegal wildlife trade