



National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)

***Securing South Africa's Wildlife Heritage:
Breaking the Illicit Value Chain of Wildlife Trafficking***

February 2017

Version 4

TABLE OF CONTENTS

	Page
PROPOSED RECOMMENDATIONS AND APPROVAL	4
LIST OF ABBREVIATIONS	6
DEFINING POACHING AND WILDLIFE TRAFFICKING	9
PROPOSED FOREWORD	11
EXECUTIVE SUMMARY	13
1. INTRODUCTION	15
2. PROBLEM STATEMENT: WILDLIFE TRAFFICKING HAS BECOME A SERIOUS ORGANISED CRIME AND NATIONAL SECURITY THREAT	17
3. NATIONAL INTEGRATED STRATEGY TO COMBAT WILDLIFE TRAFFICKING	20
3.1 VISION	20
3.2 MISSION	20
3.3 STRATEGIC OBJECTIVES OF THE NISCWT	20
4. IMPLEMENTING THE NISCWT: ROLES AND RESPONSIBILITIES	32

5.	FOCUSING ON SPECIFIC TAXA	35
6.	ADDITIONAL NON-LAW ENFORCEMENT FACTORS THAT NEED TO BE ADDRESSED	36
7.	NISCWT IMPLEMENTATION TIMEFRAMES	38
8.	MEASURING THE IMPACT OF THE NISCWT	39
9.	CONCLUSION	40
	APPENDIX A: NISCWT IMPLEMENTATION PLAN	41
	APPENDIX B: PROPOSED CONSOLIDATED WILDLIFE TRAFFICKING LAW ENFORCEMENT UNIT	61

PROPOSED RECOMMENDATIONS AND APPROVAL¹		
Recommended by: Lieutenant General SF MASEMOLA Deputy National Commissioner: Policing SAPS	Chairperson: National Joint Operational and Intelligence Structure	Signature: Date:
Recommended by: Lieutenant General JK PHAHLANE Acting National Commissioner SAPS	Co-Chairperson: Directors-General Committee Justice, Crime Prevention and Security Cluster	Signature: Date:
Recommended by: Ms N NGCABA Director-General: DEA	Director-General Department of Environmental Affairs	Signature: Date:
Recommended by: Advocate SK ABRAHAMS National Director of Public Prosecutions: NPA	National Director of Public Prosecutions National Prosecuting Authority	Signature: Date:

¹ It is proposed that the NISCWT be recommended by the relevant operational/administrative principals of the NATJOINTS and primary government role players and be approved by the Minister of Police as it is to be a SAPS-led strategy.

<p>Recommended by:</p> <p>Ms N SINDANE Director-General: DOJ & CD</p>	<p>Director-General Department of Justice and Constitutional Development</p>	<p>Signature:</p> <p>Date:</p>
<p>Recommended by:</p> <p>Mr TS MOYANE Commissioner: SARS</p>	<p>Commissioner South African Revenue Service</p>	<p>Signature:</p> <p>Date:</p>
<p>Recommended by:</p> <p>Mr AJP FRASER Director-General: SSA</p>	<p>Director-General State Security Agency</p>	<p>Signature:</p> <p>Date:</p>
<p>Recommended by:</p> <p>Ms N MAPISA-NQAKULA Minister of Defence and Military Veterans</p>	<p>Chairperson: Ministerial Committee Justice, Crime Prevention and Security Cluster</p>	<p>Signature:</p> <p>Date:</p>
<p>Approved by:</p> <p>Mr N NHLEKO Minister of Police</p>	<p>Minister of Police</p>	<p>Signature:</p> <p>Date:</p>

LIST OF ABBREVIATIONS

ACTT	-	Anti-Corruption Task Team
AFU	-	Asset Forfeiture Unit
ASEAN-WEN	-	Association of Southeast Asian Nations' Wildlife Enforcement Network
AU	-	African Union
BMA	-	Border Management Agency
CCPCJ	-	Commission on Crime Prevention and Criminal Justice
CI	-	Crime Intelligence
CITES	-	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CSIR	-	Council for Scientific and Industrial Research
DAFF	-	Department of Agriculture, Forestry and Fisheries
DDU	-	Detector Dog Unit
DEA	-	Department of Environmental Affairs
DI	-	Defence Intelligence
DOJ & CD	-	Department of Justice and Constitutional Development
DNA	-	Deoxyribonucleic acid
DPCI	-	Directorate for Priority Crime Investigation
EMI	-	Environmental Management Inspector
Ezemvelo	-	Ezemvelo KZN Wildlife
FIC	-	Financial Intelligence Centre
GCIS	-	Government Communication and Information System
ICC	-	Intelligence Coordinating Committee
ICWC	-	International Consortium on Combating Wildlife Crime
IGO	-	International Governmental Organisation

INTERPOL	-	International Criminal Police Organisation
IWG	-	Intelligence Working Group
JCPS	-	Justice, Crime Prevention and Security
KNP	-	Kruger National Park
KPA	-	Key Performance Area
LEDET	-	Limpopo Department of Economic Development, Environment and Tourism
MOU	-	Memorandum of Understanding
MTEF	-	Medium Term Expenditure Framework
MTPA	-	Mpumalanga Tourism and Park Agency
MTSF	-	Medium Term Strategic Framework
NATJOINTS	-	National Joint Operational and Intelligence Structure
NAWTU	-	National Anti-Wildlife Trafficking Unit
NDP	-	National Development Plan
NGO	-	Non-governmental organisation
NICOC	-	National Intelligence Coordinating Committee
NISCWT	-	National Integrated Strategy to Combat Wildlife Trafficking
NPA	-	National Prosecuting Authority
PCA	-	Provincial Conservation Authority
POCA	-	Prevention of Organised Crime Act
PROVJOINTS	-	Provincial Joint Operational and Intelligence Structure
SADC	-	Southern African Development Community
SANDF	-	South African National Defence Force
SANParks	-	South African National Parks
SAPS	-	South African Police Service
SARPCCO	-	Southern African Regional Police Chiefs Cooperation Organisation

SARS	-	South African Revenue Service
SLA	-	Service Level Agreement
SSA	-	State Security Agency
UN	-	United Nations
UNCAC	-	United Nations Convention against Corruption
UNEP	-	United Nations Environment Programme
UNODC	-	United Nations Office on Drugs and Crime
UNTOC	-	United Nations Convention against Transnational Organised Crime
WCO	-	World Customs Organisation
WENSA	-	Wildlife Enforcement Network for Southern Africa
WTIWG	-	Wildlife Trafficking Intelligence Working Group

DEFINING POACHING AND WILDLIFE TRAFFICKING

For the purposes of this strategy, the terms “illicit value chain”, “law enforcement”, “poacher/s”, “poaching”, “smuggling”, “trafficking syndicate” and “wildlife trafficking” are understood to mean the following:

- **ILLICIT VALUE CHAIN:** The illicit value chain encompasses the domestic and global set of activities (source, transit and market) in which criminal syndicates or criminal enterprises (including systems of functional or business specialties and roles) operate to traffic contraband products. The illicit value chain includes all activities related to the criminal enterprise, comprising supply, logistics, distribution, marketing and the sale of illicit or contraband products in an illicit market.
- **LAW ENFORCEMENT:** Law enforcement in South Africa is primarily the duty of the South African Police Service, which is responsible for investigating crime and maintaining safety and security throughout the country. The South African Police Service is established in accordance with the provisions of Section 205 of the *Constitution of the Republic of South Africa* of 1996. However, for purposes of this strategy, the term also includes, where relevant, activities of other government departments within the country’s security, juristic, conservation, customs, diplomatic and legislative domains.
- **POACHER/S:** This means or relates to an individual or a group of individuals responsible for the illegal hunting and capturing, killing, harvesting/collection and possession of fauna and flora with the intention of possessing, transporting, consuming, exporting or selling these and using their body parts.
- **POACHING:** This means or relates to any activity that contravenes the laws and regulations established to protect renewable natural resources (especially those listed as threatened and/or protected by law and international treaties) and in particular the illegal hunting (including conspiring to hunt), killing (including conspiring to kill), illegal capturing and harvesting/collection of wildlife with the intention of possessing, transporting, consuming, exporting or selling it and using its body parts.
- **SMUGGLING:** This means or relates to the illegal transportation of contraband, which includes both domestic and transnational smuggling.

- **TRAFFICKING SYNDICATE:** This relates to multifaceted centralised or decentralised criminal networks that are involved in or linked to the illicit value chain. Trafficking syndicates may include a grouping of individuals who have a shared purpose of profit and could be opportunistically linked to illicit or licit commerce.
- **WILDLIFE TRAFFICKING:** This means or relates to the entire illicit value chain of transnational wildlife organised crime, including criminal activities such as the illegal killing, harvesting, smuggling and trade of fauna and flora which takes place in an organised manner. Furthermore, wildlife trafficking also includes all forms of corruption, money laundering and marketing of the illicit goods linked to this phenomenon.

PROPOSED FOREWORD²

Our national anthem, *Nkosi Sikelel' iAfrika*, bears testimony to our love for this beautiful country. The noble principles expressed in this anthem are drawn from the Freedom Charter, that already 60 years ago affirmed that South Africa belongs to all who live in it.

South Africa is richly endowed with flora and fauna and unique ecosystems, some of which are found only here. As we affirm our commitment to conserving our magnificent country, we face a growing challenge that threatens our ability to do so. The country's Constitution places an obligation on us to ensure the protection of the environment, and to take reasonable measures to secure the ecological sustainable development and use of natural resources while promoting justifiable economic and social development. The increasing levels of wildlife crime continue to have a devastating impact on the fragile ecosystems of our country. The related serious organised crime activities are progressively becoming a severe threat to our country's national security. Wildlife trafficking syndicates constantly step up their brutal methods to get their hands on our wildlife to satisfy foreign market demands, while also corrupting some government officials and processes aimed at securing our wildlife resources. The criminal industry involved in wildlife trafficking runs organised multibillion dollar operations worldwide and their criminal enterprises by themselves will not stop without serious and sustained intervention.

South Africa's law enforcement and wildlife conservation structures have increasingly acknowledged that the issue of wildlife trafficking has evolved into a national security threat. This subsequently resulted in a change of direction in government's approach to mitigate the threat that wildlife trafficking is posing to our national security. Ever mindful of the nature of this threat, I have directed all relevant government departments and Clusters – led by the Justice, Crime Prevention and Security Cluster and our law enforcement structures – to develop and implement a national integrated strategy to combat wildlife trafficking with the necessary resources and determination so that we, as a country and a region, can reduce this growing threat. This strategy is aligned with our National Development Plan, which promotes sustainable development in South Africa and also has the objective of building safer communities.

As part of this integrated strategy we need to engage and build partnerships with communities and other stakeholders both in South Africa and foreign

² This is a suggested foreword. Parts of it are derived from the keynote address by President Jacob Zuma at the Anti-Rhino Poaching Awareness Day and visit to the Kruger National Park on 01 November 2015.

countries so that we can fight wildlife trafficking on a national and global stage. Wildlife trafficking is not just a conservation challenge; it also affects communities, destroys livelihoods and aggravates crime while entrenching poverty in communities with limited resources. We will therefore continue to emphasise the importance of uplifting communities living alongside wildlife areas which continue to bear the brunt of poaching.

We hold all our country's natural heritage in trust for future generations. Consistency, perseverance and determination are needed to win this fight. We must, therefore, count on the collaborative efforts of all government departments and non-government role players – led by the South African Police Service – to mitigate the security threat of wildlife trafficking. We are determined to maintain and increase the political focus and momentum on preventing wildlife trafficking at national, regional and international level.

The development of this strategy took place under the auspices of the Justice, Crime Prevention and Security Cluster and the South African Police Service, and is supported by all relevant government departments and relevant entities, among others the Department of Environmental Affairs, National Intelligence Coordinating Committee, South African Revenue Service, State Security Agency, Financial Intelligence Centre, South African National Parks and the South African Defence Force. This strategy is police-led and intelligence informed, with multi-agency support.

Let us continue this collaborative, whole-of-government approach by also taking hands with civil society when implementing the country's first wildlife trafficking combating strategy, as our heritage and our livelihoods depend on it.

President JG ZUMA

Republic of South Africa

May 2017

EXECUTIVE SUMMARY

Wildlife trafficking is not purely a conservation and environmental management problem but constitutes a highly sophisticated form of serious transnational organised crime that is a threat to national security. This document sets out the National Integrated Strategy to Combat Wildlife Trafficking. It is the first strategy of its kind in South Africa and has one primary goal: to direct law enforcement structures in South Africa and empower them with the necessary means to reduce and prevent the increasing scourge of wildlife trafficking, in the country itself and abroad.

To achieve this, the South African government has acknowledged the need to improve its ability to prevent, combat and investigate wildlife trafficking through achieving the following three strategic objectives:

- **Improving law enforcement, supported by the whole of government and society, to effectively investigate, prosecute and adjudicate wildlife trafficking as a form of transnational organised crime:** The strategy outlines the necessary steps the South African Police Service and other relevant government and non-government entities should take to increase and enhance law enforcement capacity in the country, focusing specifically on the investigation and prosecution of wildlife trafficking syndicates. This includes a significant increase in wildlife trafficking investigation resources (both human and technological); changing current policies which will make the South African Police Service the lead department regarding the issue of combating wildlife trafficking; increased investigations and prosecutions regarding the link between corruption and wildlife trafficking; improving intelligence gathering and analysis on the issue; strengthening collaboration between the South African Police Service and other government departments as well as non-government entities that play a role in the wildlife and conservation sectors; and consolidating law enforcement initiatives regarding the investigation of wildlife trafficking.
- **Increasing the government's ability to detect, prevent and combat wildlife trafficking in South Africa and beyond:** The strategy outlines the necessary initiatives government should take to increase its ability to detect and prevent wildlife trafficking, especially in the border management environment. This includes a significant increase in detection resources in and around the country's ports and borderlines; reducing the risk of corruption at these ports; increasing and centralising wildlife compliance and enforcement resources; and increasing crime prevention initiatives in and around poaching hotspots.

- **Increasing national, regional and international law enforcement collaboration and cooperation on combating wildlife trafficking:** The strategy outlines the necessary initiatives government should take to increase international law enforcement collaboration to improve its ability to prevent, combat and investigate the entire illicit value chain of wildlife trafficking in South Africa. This includes, among others, joint law enforcement and intelligence operations between South Africa and law enforcement agencies from transit and market countries on the topic of wildlife trafficking; increased South African participation in international wildlife trafficking combating forums; and the benchmarking of effective wildlife trafficking practices.

Achieving the above-mentioned objectives will significantly increase the South African government's ability to not only detect wildlife trafficking, but also prevent this form of serious transnational organised crime. In addition, the strategy also briefly outlines certain non-law enforcement factors the government and non-government role players should address to increase their ability to prevent wildlife trafficking. The strategy is based on a five-year plan which is divided into three time-based frameworks, a short-term strategy (first year), a medium-term strategy (first three years) and a long-term strategy (first five years and beyond). Furthermore, several measurable key performance areas are outlined in the strategy's implementation plan (Appendix A), which will be used by government to monitor and evaluate the impact of implementation on its objective of reducing wildlife trafficking in South Africa, as outlined in the strategy's implementation plan (Appendix A).

A proposed framework regarding the possible establishment of a consolidated national anti-wildlife trafficking law enforcement unit within the South African Police Service is also attached to the strategy as Appendix B. This is in line with the strategic objective of increasing and improving specialised wildlife trafficking law enforcement capacity in the country.

1. INTRODUCTION

According to Chapter 2, section 24 of the Bill of Rights in the *Constitution of the Republic of South Africa* (Act No. 108 of 1996), “everyone has the right to an environment that is not harmful to their health or well-being; and to have the environment protected, for the benefit of present and future generations...”. The country’s National Development Plan (NDP) supports this notion as there is a need for the country to “protect the natural environment in all respects, leaving subsequent generations with at least an endowment of at least equal value”. South Africa is also party to several international multilateral environmental agreements, among others the Convention on Biological Diversity and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which oblige the country to conserve its natural resources and ensure that international trade in listed wildlife species does not threaten their survival in the wild. South Africa, therefore, not only has a national obligation, but also an international obligation, to address wildlife trafficking that negatively impacts on its precious natural resources.

The proliferation of transnational organised criminal networks in South Africa since the 1990s has led to a significant escalation in the poaching and trafficking of the country’s wildlife resources that could be sold on illicit markets in other parts of the world. Until now, the low risk associated with environmental crime in South Africa and across the world has provided a relatively safe environment for criminal networks in which to operate. Taking advantage of the complexity of this type of crime, criminals operating internationally have significantly benefited and thrived while the international law enforcement community has only recently started to effectively address these crimes.

The gravity of this form of transnational organised crime has a particularly negative impact on conservation and security, and has attracted attention at the highest level of governments and the global community, as evidenced by the number of resolutions adopted by intergovernmental bodies and public statements of world leaders over the past few years, as well as regional and international strategies developed in order to combat the crime. For example, this notion was underpinned by the United Nations (UN) in 2015 when its General Assembly adopted its first ever resolution on international security concerns related to wildlife trafficking and the need to increase efforts to combat it. The resolution stated that “illicit trafficking in protected species of wild fauna and flora is an increasingly sophisticated form of transnational organized crime, recalling Economic and Social Council resolution 2012/19 of 26 July 2012, in which the Council recognized that organized crime had diversified and represented a threat to health and safety, security, good governance and the sustainable development of States, and therefore underlining the need to combat such crimes by strengthening international cooperation, capacity-building,

criminal justice responses and law enforcement effort".³

The above-mentioned issue was also emphasised in an African context in 2015 when the African Union (AU) requested that all African countries adopt or amend legislation, where necessary, which will “criminalise poaching and wildlife trafficking, and synthesize a coordinated effort in the enforcement of those laws, and their related crimes by ensuring such criminal offences are “serious crimes” within the UN Convention against Transnational Organized Crime”.⁴

To combat wildlife trafficking, which encompasses the entire illicit value chain in an organised manner, the South African government has identified the need for a whole-of-government approach (assisted by civil society). The National Integrated Strategy to Combat Wildlife Trafficking (NISCWT) addresses this need.

³ United Nations, General Assembly, *Resolution 69/314*, 30 July 2015.

⁴ http://static1.1.sqspcdn.com/static/f/157301/26193850/1430685924260/BRAZZA+DECLARATION+FINAL_EN.pdf?token=ucBETKGiDVyEtDvEWE0w2VosSkA%3D.

2. PROBLEM STATEMENT: WILDLIFE TRAFFICKING HAS BECOME A SERIOUS ORGANISED CRIME AND NATIONAL SECURITY THREAT

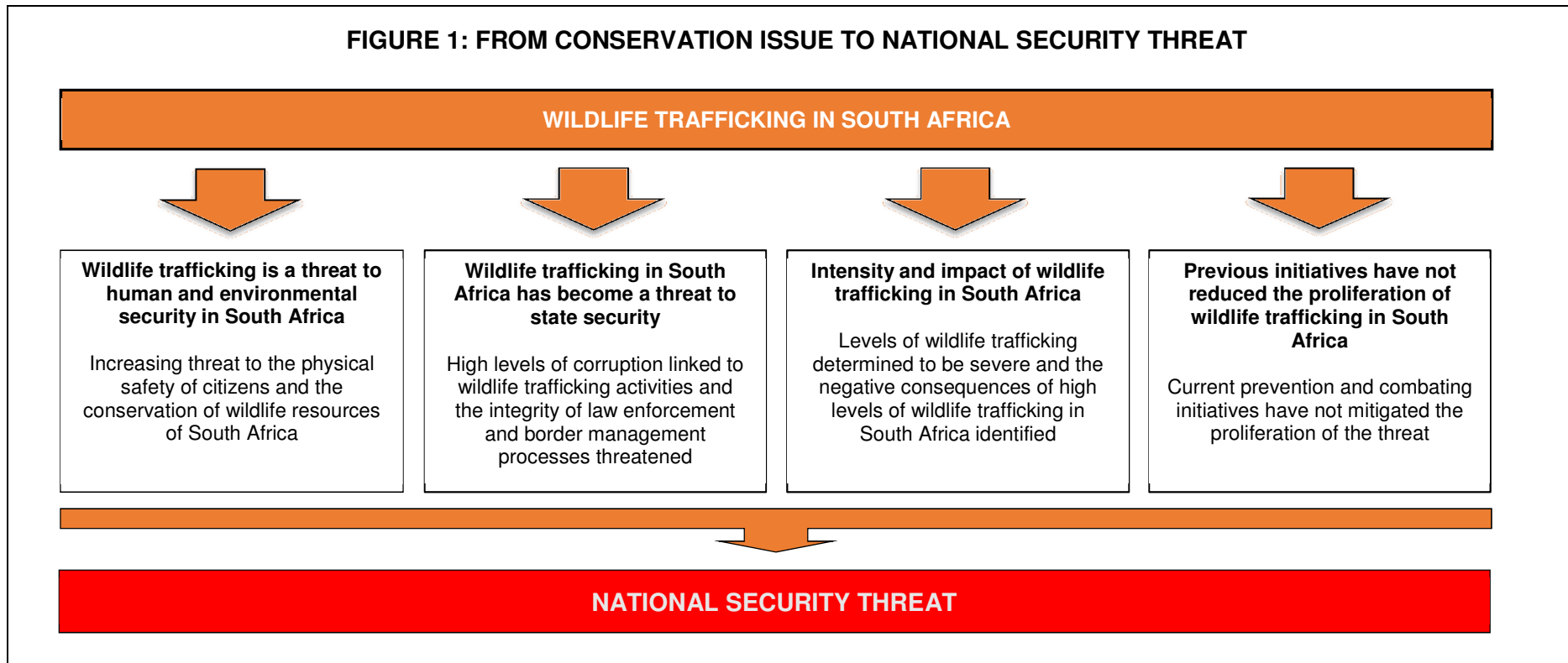
Fundamental to the new strategic approach to counter wildlife crime is the acceptance that it is not only an environmental concern only, but has evolved into a serious organised crime and national security threat in South Africa, which requires focused law enforcement. This notion is supported by the following factors and trends related to wildlife trafficking in South Africa (as illustrated in Figure 1 on page 18):

- **Wildlife trafficking is a threat to human and environmental security in South Africa:** Government security and conservation officials, private rhinoceros owners, private security personnel, and others, face increasing physical risks in their attempts to prevent wildlife crime. The number of poachers (South African citizens and foreign nationals) killed while committing such crime has also escalated over the past few years. Moreover, the safety of communities living adjacent to protected areas that have become poaching hotspots, as well as the safety of domestic and international tourists visiting these attractions, is potentially at risk. Ultimately, the biodiversity and natural resources of the country, especially in the light of the significant increase in the numbers and range of wildlife species (e.g. rhinoceros, elephant and abalone) being poached over the past few years, are also increasingly under threat.
- **Wildlife trafficking in South Africa has become a threat to state security:** Transnational organised crime's focus on wildlife commodities in South Africa has contributed to the erosion of the rule of law and security in the country, which encompasses five main aspects. Firstly, armed criminals from neighbouring countries are crossing international borderlines illegally to conduct criminal operations in South African territory. Secondly, it has a negative impact on the economic development of the country and job creation, including the development of the country's biodiverse economy which incorporates the tourism sector. Thirdly, wildlife trafficking is hampering the government's ability to ensure socio-economic development, as organised crime syndicates and activities have become embedded in communities across the country. Fourthly, it has been noted that criminal syndicates involved in other organised crime activities have diversified their criminal enterprises to include wildlife trafficking. Lastly, wildlife is increasingly being smuggled out of the country, either through corruption or by circumventing current border management policies. In addition, security and conservation personnel (at all levels) tasked with protecting the integrity of the government and the enforcement of its laws have increasingly become involved in this form of

transnational organised crime. Wildlife trafficking, therefore, is increasingly having a negative impact on the government's ability to ensure the integrity of its governance processes and structures, as well as on its ability to ensure domestic stability.

- **Intensity and impact of wildlife trafficking in South Africa:** It has not only been the unparalleled increase in the numbers of rhinoceros being poached in South Africa since 2008 which attests to the intensity of the threat, but also the increase in the range of wildlife species being poached and smuggled. This has had a serious impact on the long-term viability of some of the country's wildlife populations. It has also negatively impacted on the social fabric of certain communities – especially from impoverished areas characterised by high levels of unemployment – which have become increasingly involved in the poaching of the country's natural resources, resulting in international wildlife trafficking syndicates establishing networks throughout the country and strengthening their illicit authority. However, the use of sophisticated equipment, including helicopters and chemical immobilisation equipment, in rhinoceros and other poaching activities, indicates that criminal activity is not solely associated with impoverished communities, but has also been undertaken by skilled wildlife professionals.
- **Previous initiatives have not reduced the proliferation of wildlife trafficking in South Africa:** Rhinoceros horn trafficking has increased in South Africa by more than 210% between 2010 and 2016 (with annual poaching figures of 333 in 2010 and 1054 in 2016). In addition, regional rhinoceros poaching figures for 2015 were the highest for two decades and outline an escalation of the threat in the Southern African Development Community (SADC) region. The continued high levels of rhinoceros poaching indicate the country's current inability to mitigate this threat, even though increasing resources were allocated over the same period to reduce the phenomenon. Also, this sector has remained vulnerable in part owing to the lack of institutionalised multi-agency law enforcement cooperation at national and provincial level, thereby weakening appropriate governance response to the proliferation of wildlife trafficking in South Africa. This was further compounded by the low priority attributed to the issue of wildlife trafficking by law enforcement structures. In addition, a parallel increase in the scale and breadth of other forms of wildlife trafficking, e.g. cycads, ivory and abalone, from South Africa also bears testament to the challenge in mitigating this threat to date. Furthermore, current security and prosecution initiatives have not deterred the proliferation of this form of organised crime in South Africa. This inability to mitigate the threat, however, forms part of a broader international law enforcement challenge, as the neutralisation of the entire transnational illicit value chain (all along the route from where the poaching takes place, transportation, intermediaries, smugglers, wholesalers and to the consumer) regarding wildlife trafficking remains a security challenge to all countries

involved. This is largely because governments across the world, including South Africa, addressed the issue of wildlife trafficking as a national conservation rather than a transnational organised crime issue, which this strategy aims to rectify.



This phenomenon has, therefore, necessitated the development of urgent strategic measures that will lead to improved law enforcement of wildlife trafficking in South Africa, as outlined in the next section of the strategy.

3. NATIONAL INTEGRATED STRATEGY TO COMBAT WILDLIFE TRAFFICKING

3.1 VISION

A well-resourced and implemented integrated, multidisciplinary and consolidated law enforcement approach to break the illicit value chain of wildlife trafficking in South Africa and beyond.

3.2 MISSION

To focus and direct law enforcement's ability, supported by the whole of government and society, to address the threat wildlife trafficking poses to national security and biodiversity.

3.3 STRATEGIC OBJECTIVES OF THE NISCWT

The following objectives have been identified to significantly increase the government's ability to address the security threat wildlife trafficking currently poses to the country:

- **Improving law enforcement, supported by the whole of government and society, to effectively investigate, prosecute and adjudicate wildlife trafficking as a form of transnational organised crime.**
- **Increasing the government's ability to detect, prevent and combat wildlife trafficking in South Africa and beyond.**
- **Increasing national, regional and international law enforcement collaboration and cooperation on combating wildlife trafficking.**

The above-mentioned strategic objectives speak mainly to law enforcement measures regarding the prevention of wildlife trafficking and not to other factors such as conservation education, demand reduction for wildlife contraband and socio-economic development of those poverty-stricken communities where high levels of poaching occurs. Although it is recognised that these additional non-law enforcement factors will play a role in the reduction of wildlife trafficking in South Africa, the NISCWT focuses primarily on the improvement of government's ability to prevent wildlife trafficking from a policing and security point of view. These factors are, however, described in more detail further in the strategy.

Objective one: Improving law enforcement, supported by the whole of government and society, to effectively investigate, prosecute and adjudicate wildlife trafficking as a form of transnational organised crime

- a) **Adequately resource the law enforcement initiatives outlined in the NISCWT:** The sustainability of the NISCWT solely depends on the sufficient medium- and long-term funding and resource (human and technical) allocation towards implementation of the strategy. The South African Police Service (SAPS) and other relevant government entities should ensure that effective long-term strategic and financial planning and implementation regarding their roles and responsibilities are executed and adhered to. It is envisaged that in view of the economic constraints this will be achieved in a phased approach, as indicated in the strategy's implementation plan (Appendix A).

- b) **Increase effectiveness and coordination of intelligence collection and analysis on wildlife trafficking:** The term "crime intelligence" is defined in South Africa's *National Strategic Intelligence Act* of 1994 as "intelligence used in the prevention of crime or to conduct criminal investigations and to prepare evidence for the purpose of law enforcement and the prosecution of offenders". In addition, in the same Act it is stated that it will be the function of the SAPS (Crime Intelligence Division in this case) to "gather, correlate, evaluate, co-ordinate and use crime intelligence in support of the objects of the SAPS as contemplated in section 205 of the Constitution". This should also include information on the topic of wildlife trafficking that is readily available

(overt and covert) from non-intelligence role players. The SAPS Crime Intelligence (CI) Division should be the primary intelligence role player responsible for gathering, analysing, operationalising and liaising intelligence on the topic of wildlife trafficking in South Africa, which includes the following:⁵

- At a **strategic level**, the SAPS (with support from other government role players) needs to increase its ability to assess current and emerging wildlife trafficking threats, and conduct regular national, provincial and regional crime mapping and intelligence assessments to provide an evidence base for policy, legislative and law enforcement interventions and prioritisation. The National Intelligence Coordinating Committee (NICOC) should assist the SAPS with interdepartmental intelligence coordination to strengthen the government's ability to assess current and possible forewarning of all security threats related to wildlife trafficking.

 - At a **tactical and operational level**, there is a need for improved and increased crime intelligence gathering, analysis and coordination by the SAPS on wildlife trafficking. These needs will, therefore, necessitate a significant increase in resources and skills within the SAPS and other government intelligence structures. Lastly, the SAPS CI should:
 - Consolidate all available intelligence related to wildlife trafficking.
 - Develop a consolidated intelligence database and a governance mechanism wherein other government departments (including provincial structures) and non-governmental organisations (NGOs) should share information, coordinate intelligence initiatives and relevant departments can receive consolidated intelligence products.
 - Provide effective operational support to all wildlife trafficking investigations and interventions within the SAPS.
- c) **Improve law enforcement capacity to investigate wildlife trafficking:** The increase in wildlife trafficking in South Africa has highlighted that the SAPS needs to increase dedicated specialised law enforcement capacity to investigate these activities. It is, therefore, important to determine where the relevant law enforcement capacity and resource needs to address this issue are located. This includes capacity and resource matters relating to specialised

⁵ In accordance with the *National Strategic Intelligence Amendment Act of 2002*, it shall be the function of the South African Police Service, subject to section 3: (a) to gather, correlate, evaluate, co-ordinate and use crime intelligence in support of the objects of the South African Police Service as contemplated in section 205 (3) of the Constitution; (b) to institute counter-intelligence measures within the South African Police Service; and (c) to supply crime intelligence relating to national strategic intelligence to NICOC.

investigation, intelligence gathering and analysis, enforcement of wildlife legislation, legislative and policy development and joint international law enforcement projects (addressing the entire illicit value chain of wildlife trafficking). The identified gaps regarding law enforcement capacity on wildlife trafficking should, therefore, be reduced through adequate resource allocation, specialised skills development and consolidation of dedicated resources. There is also a need to increase organisational capacity and skills on wildlife trafficking at a local level within the SAPS. In addition, the Department of Environmental Affairs (DEA) and Provincial Conservation Authorities (PCAs) such as Ezemvelo Wildlife in KwaZulu-Natal, the Limpopo Department of Economic Development, Environment and Tourism (LEDET) and the Mpumalanga Tourism and Park Agency (MTPA), need to increase their Environmental Management Inspectors' (EMI) capacity to assist and enhance their operational support to relevant role players. Lastly, there is an increasing need for foreign language capacity (specifically focused on languages used by foreign nationals originating or operating from transit and market countries) within the SAPS investigative capacity. To achieve the above-mentioned, the government may use tools such as the International Consortium on Combating Wildlife Crime (ICWC)'s *Indicator Framework for Combating Wildlife And Forest Crime* as a possible strategic guideline to improve its wildlife trafficking law enforcement capacity.

- d) **Increase anti-corruption investigations linked to wildlife trafficking:** Corruption linked to wildlife trafficking in South Africa is not only hampering the government's ability to prevent wildlife trafficking, but has allowed criminal networks to establish criminal elements within government structures responsible for the detection, investigation and prevention of such trafficking. There is, therefore, a major need for government to increase its initiatives against corruption linked to wildlife trafficking. This should not only include an increase in the number of investigations into and arrests of corrupt persons linked to wildlife trafficking, but should also result in those persons receiving appropriate sentences which reflect the seriousness of the crime, including the seizure and forfeiture of assets.
- e) **Enhance resources to investigate financial crimes linked to wildlife trafficking:** The government's ability to detect and investigate illicit money flows linked to wildlife trafficking (e.g. financial gains from poaching, smuggling, money laundering and tax evasion) needs to be expanded. The SAPS, specifically the Directorate for Priority Crime Investigations (DPCI), assisted by role players such as the Financial Intelligence Centre (FIC) and the South African Revenue Service (SARS), should, therefore, increase its initiatives (including resources and investigative skills and technology) to enhance its ability to detect, investigate and prevent illicit money flows linked to wildlife trafficking, both domestically and internationally. This is based on section 17F(3) of the *South African Police Service Act* of 1995, which states that the DPCI "shall be assisted in the performance of its functions by personnel

seconded by relevant government departments or institutions, which may include personnel from the South African Revenue Service, the Financial Intelligence Centre...”. This could even entail secondments from those departments to the DPCI to enhance the directorate’s investigations capacity regarding illicit financial flows linked to wildlife trafficking. The profitability of wildlife trafficking should be targeted to deter and disrupt the functioning of this form of criminal enterprise. Therefore, a combined approach, including resources of SARS and the FIC, should be considered during criminal investigations. Provisions in the *Prevention of Organised Crime Act* (POCA) of 1998, may similarly be considered for combating crimes of this nature.

- f) **Enhance forensic capacity linked to wildlife trafficking investigations:** Effective forensic investigations will have a positive impact on the identification, investigation and prosecution of wildlife trafficking syndicates. There is, therefore, a need for the SAPS to establish a specialised forensic laboratory with relevant capacity to investigate ballistics and human and wildlife deoxyribonucleic acid (DNA), to address the broader issue of wildlife trafficking. In this regard, the SAPS should join forces with relevant role players, such as the DEA and CSIR, regarding this objective. In addition, the SAPS needs to ensure that standard operating procedures are followed regarding the operational collection of DNA at all incidents of wildlife trafficking (including poaching incidents). This includes the collection, dissemination and database management of all DNA linked to wildlife trafficking. Furthermore, the SAPS also needs to increase the use of electronic forensic investigative resources to enhance its investigative capacity on the issue of wildlife trafficking. This should be done by incorporating other government role players who have specialised electronic forensic investigative resources to assist the SAPS.
- g) **Increase the government’s ability to detect the involvement of foreign diplomats in wildlife trafficking in South Africa:** There is a need for government to increase its ability to detect, investigate and deter the involvement of foreign diplomats in wildlife trafficking in South Africa. This will include increased intelligence-driven operations on the issue, as well as the Department of International Relations and Cooperation (DIRCO) increasing its interaction with local embassies on wildlife trafficking. Appropriate action against such diplomats should be taken based on the seriousness of the crime committed.
- h) **Appropriately charge offenders in relation to these types of crimes and focus investigations on dealing with wildlife trafficking as a serious organised crime:** For example, instead of just trespassing, more serious charges should be considered upon arrest and investigation. Standard

operating procedures and policy directives are required for the SAPS and the National Prosecuting Authority (NPA) to deal with the arraignments of the accused in these crimes uniformly countrywide. Experienced and specialised prosecutors should guide these investigations.

- i) **Establish specialised prosecution and court capacity to focus on wildlife trafficking:** In view of the need to deal with these matters in a dedicated and focused manner where required, dedicated prosecutors and courts should be used to prioritise these matters. This is especially necessary in hotspots where high levels of wildlife trafficking have been recorded over the past five years, e.g. rhinoceros horn trafficking from the Kruger National Park (KNP) and abalone trafficking from the Western and Eastern Cape. This approach is strengthened by section 17F(4) of the *South African Police Service Act of 1995*, which states: “The National Director of Public Prosecutions should ensure that a dedicated component of prosecutors is available to assist and co-operate with members of the Directorate in conducting its investigations”. Lastly, there is a need to increase foreign language interpreting capacity (specifically focused on languages used by foreign nationals originating or operating from transit and market countries) in support of the prosecution of these crimes.
- j) **Prioritise wildlife trafficking crime statistics into the national crime statistics:** To effectively manage current and newly established interventions on wildlife trafficking, appropriate crime statistics relating to these crimes are required, which are currently not available. A separate crime category needs to be created for wildlife trafficking cases (including all relevant cases relating to statutory and common law crimes linked to wildlife trafficking) in the SAPS’s national crime statistics database, while the DEA will continue monitoring priority wildlife mortalities as a form of conservation management. It will be the SAPS’s responsibility to report on these statistics on an annual basis as is the case with all serious crime categories.
- k) **The SAPS to enhance cooperation and collaboration with non-governmental organisations and private security structures:** To increase government’s ability to detect, investigate, prosecute and prevent wildlife trafficking in South Africa, identified wildlife NGOs, as well as private security and other relevant structures should be requested to provide support in the following ways:
 - Undertaking research on wildlife trafficking trends and analyses of illegal trade in wildlife species and products
 - Acting as a conduit to assist in the provision of relevant information on trafficking activities and syndicates and/or individuals involved in illegal activity related to wildlife trafficking

- Assisting through access to local communities where poaching/smuggling occurs, linked to environmental education or other community-based activities
 - Providing specialised skills to assist with training and skills development of relevant government entities
 - Providing support in terms of specialised investigative, analysis and detection equipment, e.g. software and hardware
 - Providing input in relation to policy development relating to wildlife trafficking
 - Sourcing information in transit and market countries through their offices and colleagues operating in these countries. Also, facilitate dialogue and engagement between South African officials and relevant agencies in these countries if required.
- l) **Government to consolidate all law enforcement investigation and intelligence initiatives regarding the combating of wildlife trafficking in South Africa (long-term strategy):** In order to prevent fragmentation and silo approaches to the combating of wildlife trafficking, there is a need for the government to consolidate and coordinate law enforcement activities. This necessitates the establishment of a permanent, well-resourced, specialised, multi-agency law enforcement structure with national command and control, with the specific mandate to prevent, combat and investigate all levels of wildlife trafficking syndicate activities in the country. Issues such as intelligence collection and gathering, investigations and international collaboration on wildlife trafficking will, therefore, fall under the mandate of such a law enforcement structure. The broad outline of such a consolidated law enforcement structure is proposed in Appendix B of the NISCWT.

Objective two: Increasing the government's ability to detect, prevent and combat wildlife trafficking in South Africa and beyond

- a) **Significantly reduce the risk of wildlife-related corruption:** The reduction of corruption in government structures which have the responsibility of addressing wildlife trafficking should be classified as a national priority. In addition to the identification, arrest and prosecution of corrupt persons, the government should also increase its measures to prevent corruption from taking place. This should for example, include the strengthening of official compliance measures regarding the wildlife industry; increased vetting; improved measures to ensure legitimate cross-border transport of wildlife and by-products; increased internal monitoring and evaluation of law enforcement and compliance initiatives and associated risk (at an operational level); and

increasing the punitive consequences upon conviction and sentencing in relation to crimes of this nature (e.g. longer sentences, asset forfeiture and loss of government pension).

- b) **Increase resources for security at South Africa's land, air and sea borders:** There is a need for increased security measures, including additional resources, to be deployed at the land, air and sea borders.
- c) **Increase focus on transport routes, informal and private landing strips and illegal border crossing points linked to wildlife trafficking:** This area will be prioritised by increasing law enforcement visibility (including traffic and metropolitan law enforcement agencies) on land smuggling routes, prioritising *ad hoc* law enforcement and intelligence gathering operations at smaller informal and private landing strips (legal and illegal) linked to wildlife trafficking and increasing joint law enforcement operations with the South African National Defence Force (SANDF) at cross-border wildlife trafficking hotspots between South Africa and its neighbouring countries.
- d) **Include increased crime prevention initiatives in and around communities adjacent or linked to poaching hotspots as part of law enforcement activities:** There is a need for the SAPS to increase its crime prevention operations in communities adjacent or linked to poaching hotspots, as many of the poachers originate from these areas. For example, communities living to the west and south of the KNP and adjacent to the Hluhluwe-Imfolozi Game Reserve in KwaZulu-Natal as well as in and around abalone poaching hotspots in the Western and Eastern Cape should be focused on by the SAPS for increased crime prevention operations.
- e) **Improve detection and prevention of wildlife trafficking through ports:** An improvement in the government's general ability to effectively manage its governance processes at ports is essential to the reduction of wildlife trafficking in South Africa, including the following:
- Focused operations leading to increased accountability and improved monitoring of officials responsible for the management of legal wildlife movement (compliance and permitting) and officials responsible for enforcing border management policies (ensuring due diligence)
 - Wildlife trafficking prevention to be incorporated as a security priority at all ports, including transit areas
 - Increased training and skills development at all ports on addressing wildlife trafficking

- Significant increase in wildlife detection resources at all ports (starting with prioritised ports), including technology, detector dogs, human resources and permanent facilities to host these resources
 - Equal emphasis to be placed on wildlife contraband leaving and entering South Africa
 - Increased route/vessel profiling at air and marine ports (especially those originating from or departing to transit and market countries and other known smuggling routes in relation to wildlife trafficking)
 - Increased intelligence operations, collection, analysis and dissemination, as well as intelligence gathering resources at all major ports on the issue of wildlife trafficking
 - Increased collaboration with private security and cargo handlers at ports, to enhance the government's ability to collect information, screen and profile the movement of cargo and people, and to enforce border management policies.
- f) **Consolidate and increase wildlife compliance and enforcement:** The NISCWT should not only address the organised criminal element of wildlife trafficking, but also wildlife compliance and enforcement issues relating to wildlife trafficking. Current challenges regarding wildlife compliance and enforcement, such as resource shortages; fragmentation and inconsistency in legislation and regulatory implementation (as this is both a provincial and national mandate); lack of specialised skills; collusion by wildlife management officials; non-compliance with permits and permit conditions; and lack of a consolidated national permitting structure and database are hampering the government's ability to reduce wildlife crimes and to enforce existing wildlife management and conservation legislation. To mitigate these challenges, the DEA, with the support from relevant PCAs, should:
- Significantly increase its wildlife compliance and enforcement resources nationally (in particular the capacity of the Environmental Management Inspectorate) to ensure improved wildlife compliance and enforcement, both nationally and provincially.
 - Initiate a policy and legislative development process (including a review of the constitutional mandates) to move towards the national consolidation of all forms of wildlife compliance and enforcement, including permitting, databases, investigations, etc., to overcome the current challenge of a fragmented wildlife management structure in the country (provincial wildlife management structures are not currently accountable to national wildlife management structures). In this regard it would be critical to develop an effective regulatory system (which includes provincial and national wildlife compliance and enforcement structures) that is accountable to the DEA as the national department for such matters.

- Review the country's current wildlife permit system and the necessary wildlife management legislation and policies to identify and close loopholes exploited by criminal elements.
- Execute a national risk and security assessment of all relevant wildlife parks/reserves where wildlife trafficking has been recorded (nationally and provincially), so that the necessary policy and procedure changes can be made to strengthen the country's ability to prevent the trafficking of its wildlife. The SAPS and the State Security Agency (SSA) are to assist the DEA in this matter.

Objective three: Increasing national, regional and international law enforcement collaboration and cooperation on combating wildlife trafficking

- a) **Diplomatic position on wildlife trafficking to reflect the issue as a national security priority:** South Africa's international diplomatic engagement should seek to improve international law enforcement cooperation by transcending this issue from a conservation issue to a national security priority. This position should be adopted when all official bilateral and multilateral engagements on the topic take place between South Africa and foreign governments, especially with transit and consumer countries (along the entire illicit value chain). South Africa will not be able to stem the current tide of wildlife trafficking in the country if governments from transit and market countries have not agreed, at a diplomatic level, to address the issue as an international law enforcement priority. This will, therefore, mean that the SAPS, DEA, DIRCO, the Department of Agriculture, Forestry and Fisheries (DAFF), SSA and SARS should be the lead departments (joint approach) whenever the South African government is represented at any international forum on the issue of wildlife trafficking. Expectedly, international law enforcement cooperation between stakeholder countries will improve if wildlife trafficking is elevated to a security issue at a diplomatic level rather than being dealt with as a conservation issue.
- b) **Strengthen law enforcement cooperation with relevant countries:** Diplomatic relations with foreign countries implicated in participating in the illicit value chain of wildlife trafficking from South Africa should encourage the strengthening of law enforcement and intelligence gathering cooperation with South Africa and relevant transit and market countries. This would include that joint law enforcement and intelligence gathering/sharing agreements be developed and approved (where there are none) and operations be initiated with relevant countries on the topic of wildlife trafficking.

- **Transit countries:** The proposed law enforcement and intelligence gathering/sharing agreements between South Africa and transit countries should commence with an agreement with the Mozambican government that should investigate the possibility of joint tactical law enforcement and intelligence operations across the South Africa-Mozambique borderline, which requires:
 - cross-border pursuit of poachers smuggling rhinoceros horn
 - specialised law enforcement resource support to the Mozambican government (e.g. special operations in the Massingir area)
 - providing the Mozambican government with wildlife trafficking detection skills and technology as a form of law enforcement support (including detector dog training and capacity building)
 - providing the Mozambican government with intelligence on trafficking syndicates operating in that country to increase its ability to detect and prosecute those syndicates.
 - Subsequent to the above, the same must be duplicated with other identified priority wildlife trafficking transit countries.
- **Market countries:** The proposed law enforcement and intelligence gathering/sharing agreements between South Africa and market countries should commence with agreements with the Chinese and Vietnamese governments, which should investigate the possibility of joint tactical law enforcement and intelligence operations. This should include the sharing of intelligence on trafficking syndicates operating in the respective countries to increase their ability to detect and prosecute such syndicates. Subsequent to this, the same must be duplicated with other identified priority wildlife trafficking market countries.
- Criminal extradition and legal assistance agreements are to be developed, approved and implemented with all relevant countries. This should result, as a matter of urgency, in known wildlife trafficking organisers operating from countries such as Mozambique, China and Vietnam being extradited to South Africa for prosecution. The use of tools such as Interpol notices is encouraged regarding this matter.
- A domestic wildlife trafficking law enforcement forum, with foreign law enforcement representation located in South Africa (e.g. police attachés, custom attachés and foreign intelligence services), should be established. This will allow South Africa's law enforcement agencies to directly engage foreign law enforcement on the topic of wildlife trafficking.

- The SAPS should establish joint law enforcement projects with foreign law enforcement and customs agencies so that it can increase its ability to effect international “controlled deliveries” to gather intelligence on the entire illicit value chain of wildlife trafficking from South Africa.
 - The SAPS should increase its resource allocation to Interpol and the utilisation of its processes regarding international law enforcement cooperation, specifically on the issue of wildlife trafficking.
- c) **Benchmark global best practices regarding wildlife trafficking investigations/prevention:** South Africa can use several international examples of foreign wildlife trafficking investigation structures and prevention resources (such as detection technology, analysis software and law enforcement coordination tools) as a benchmark to increase its ability to detect, investigate, prosecute and prevent wildlife trafficking. The SAPS and other role players should, therefore, benchmark international best practices on the detection and prevention of wildlife trafficking.
- d) **The SAPS to play a key role in regional and international wildlife trafficking combating initiatives:** South African departments, especially the SAPS, should increase its resources and support (both strategic and operational) to international anti-wildlife trafficking initiatives and forums. This should be done to harmonise approaches for addressing wildlife trafficking, strengthen legislative/legal frameworks, connect countries and foster inter-agency trust and communication. The SAPS should, for example, prioritise wildlife trafficking as a policing priority when engaging other policing agencies at the Southern African Regional Police Chiefs Cooperation Organisation (SARPCCO). In addition, the SAPS (and other government role players) should increasingly engage international governmental organisations (IGOs) such as the United Nations Office on Drugs and Crime (UNODC), ICCWC, the SADC Wildlife Crime Prevention and Coordination Unit, the Association of Southeast Asian Nations’ Wildlife Enforcement Network (ASEAN-WEN) and the Green Customs Initiative, as they have shown to be effective platforms of law enforcement collaboration on wildlife trafficking at international level.

4. IMPLEMENTING THE NISCWT: ROLES AND RESPONSIBILITIES

Several government and non-government structures will be required to play a significant role in the implementation of the NISCWT, especially the **South African Police Service**, which is fundamentally the lead Justice, Crime Prevention and Security (JCPS) Cluster department regarding the implementation of the strategy. It is the SAPS's mandate to detect, investigate and prevent all forms of organised crime in South Africa.

Other government departments and non-government entities involved in law enforcement, border management, customs, wildlife management and the conservation sector will also play an important role in assisting the SAPS regarding the effective implementation of the NISCWT, as described below:

- **Border Management Agency (BMA):** The proposed BMA should aim to increase the government's ability to detect and prevent transnational organised crime to and from South Africa through the establishment of a nationally integrated border management structure.
- **Department of Environmental Affairs (DEA):** The DEA should play an important role in the implementation of the NISCWT, especially regarding the department's mandate of enforcement and compliance relating to environmental issues, the national coordination of the Environmental Management Inspectorate (EMI) and its access to and oversight over the wildlife industry, as well as by providing a force multiplier to the SAPS through its already established wildlife crime investigation capacity and providing support regarding international cooperation through its already established working relationships with international conservation structures. In addition, the DEA is also the national CITES management authority in South Africa.
- **Department of Agriculture, Forestry and Fisheries (DAFF):** The DAFF should provide a supporting role regarding relevant wildlife trafficking investigations for marine species under its jurisdiction, for example abalone trafficking, especially on issues such as compliance, access to information and the permitting of the abalone industry and possible loopholes being exploited by wildlife trafficking syndicates involved in such activities.
- **Department of International Relations and Cooperation (DIRCO):** DIRCO should provide international diplomatic support to the SAPS regarding any interaction (including the development of bilateral and multilateral agreements) between the SAPS and DEA and the law enforcement and conservation agencies of other governments on the investigation and prevention of wildlife trafficking.
- **Department of Justice and Constitutional Development (DOJ & CD):** The DOJ & CD should assist all relevant government role players in the development or amendment of legislation or any other legal frameworks where necessary, as stipulated in the objectives of the NISCWT, and assist with

the provision of relevant appropriate courts to deal with the expedited prosecution and adjudication of matters of this nature. The NPA and the department should also communicate successes achieved regarding the prosecution, conviction and, where appropriate, strong sentences to the public so as to assist in deterring these crimes.

- **Financial Intelligence Centre (FIC):** The FIC should provide SAPS's criminal investigators with financial intelligence on issues such as money laundering and illicit money flows relating to wildlife trafficking.
- **National Intelligence Coordinating Committee (NICOC):** NICOC should provide strategic intelligence coordination support to the government on the issue of wildlife trafficking in South Africa.
- **National Prosecuting Authority (NPA):** The NPA should provide specialised and dedicated prosecution direction and support to investigations into wildlife trafficking. Experienced prosecutors should be allocated to deal with these prosecutions and to help prioritise and expedite such matters. The NPA's Asset Forfeiture Unit (AFU) should play a more prominent role in the prosecution of wildlife trafficking syndicates.
- **Non-Governmental Organisations (NGOs) and Private Security (PS):** These include relevant domestic non-government entities such as conservation organisations, wildlife research organisations, private wildlife owners and relevant associations, as well as private security companies (currently protecting both private and government game reserves) which should play an important role in increasing the government's ability to detect, investigate and prevent wildlife trafficking.
- **South African National Defence Force (SANDF):** The SANDF's role is not limited to that in the country's border management initiatives. It should also play a supporting role in providing tactical support where cross-border wildlife trafficking takes place between South Africa and its neighbouring countries.
- **South African National Parks (SANParks):** SANParks should provide input to SAPS investigations with tactical support relating to poaching incidents in and around their parks/reserves (detection, intelligence, etc.) which will lead to the identification, arrest and prosecution of broader wildlife trafficking syndicates operating outside national/provincial parks/reserves.
- **Provincial Conservation Authorities (PCAs):** PCAs responsible for managing provincial reserves should provide input to SAPS investigations with tactical support relating to poaching incidents in and around their parks/reserves (detection, information, etc.) which will lead to the detection, arrest and prosecution of wildlife trafficking syndicates operating in and outside provincial parks/reserves. EMIs responsible for wildlife investigations within these provincial authorities should also play a force multiplier role to the SAPS.
- **South African Revenue Service (SARS):** SARS should increase the government's ability to detect wildlife smuggling through South Africa's ports by continuing to provide customs detector dogs imprinted for wildlife contraband and by supporting the SAPS in possible controlled-delivery operations and

World Customs Organisation (WCO) liaison. In the context of its revenue mandate, SARS should strengthen government's ability to detect and investigate possible tax evasion and tax-related money laundering for the purpose of tax evasion during all criminal investigations of wildlife trafficking enterprises. SARS should continue to support the wildlife contraband detection capacity of other departments and neighbouring customs authorities.

- **State Security Agency (SSA):** The SSA should assist by playing a domestic and foreign intelligence gathering support role to the SAPS regarding wildlife trafficking investigations (as a form of transnational organised crime and a subsequent threat to national security).

The roles and responsibilities of all relevant stakeholders should, therefore, be clearly defined in the strategy's implementation plan (Appendix A) and the implementation be monitored on a continuous basis by the principals of the JCPS Cluster and other relevant Clusters (especially in relation to the DEA as a key role player in the implementation of the NISCWT). The JCPS Cluster should on a regular basis be provided with progress reports and challenges that should be addressed inter-sectorally. There will also be a need for the Presidency, the principals of the JCPS Cluster and other relevant Clusters to annually evaluate the effectiveness of the strategy, a process that should be led by the SAPS.

5. FOCUSING ON SPECIFIC TAXA

There is a need to declare crimes committed in relation to specific species linked to wildlife trafficking a national policing priority (as was done with rhinoceros). In addition, taking into account current limited specialised law enforcement resources allocated to the detection, investigation, prosecution and prevention of wildlife trafficking in South Africa, it would be impossible for the SAPS and other role players to effectively improve the country's ability to combat wildlife trafficking if the focus were on all forms of wildlife crime in the country. To mitigate this challenge, the NISCWT's focus will, in the first instance, be on the following four declared priority taxa and significant forms of wildlife trafficking in South Africa:

- Rhinoceros – trafficking of parts such as horn and derivatives
- Elephants – ivory trafficking
- Abalone trafficking
- Cycad trafficking.

However, it should be noted that the implementation of the NISCWT will have a direct impact on the government's ability to detect and prevent other forms of wildlife crime (e.g. pangolin, exotic birds, snakes, crayfish and timber) as well. Increasing wildlife trafficking detection resources at the country's ports will strengthen the government's ability to detect all forms of illicit wildlife contraband going through these ports, not only the four declared priority taxa mentioned above. Lastly, the specific types of taxa linked to the implementation of the NISCWT should be reviewed annually by the relevant government role players responsible for the implementation of the strategy.

6. ADDITIONAL NON-LAW ENFORCEMENT FACTORS THAT NEED TO BE ADDRESSED

In addition to the law enforcement actions mandated to the NISCWT, it is noted that a range of additional activities are required in relation to addressing the illicit supply chain for high-value wildlife products. The overarching purpose of all such interventions is to reduce criminal behaviour by increasing efforts and risks and decreasing the benefits associated with wildlife trafficking.

Generally, global awareness about wildlife trafficking and the impact on flagship species such as rhinoceros and elephants, including subsequent economic and ecological effects, is very high. There is a need to continue communication and awareness raising work to all relevant audiences in South Africa, including government, as well as corporate and civil society, to inform people about the effects and what they can do to assist in preventing wildlife trafficking.

Globally, there is a need for communication targeted at changing the behaviour of end-consumers in order to reduce the demand for illicit wildlife products and generate a change in the social acceptability of consumption of illegal wildlife products. The extremely high commercial value attached to illicit wildlife products, such as illegal rhinoceros horn and ivory, is currently the primary driver behind this criminal activity. Any communication campaigns in this regard need to be supported by law enforcement actions in consumer countries, to reduce the level of supply of illegal products available and increase the risk of penalty to those behaving illegally by consuming illicit products.

At national level, combating wildlife trafficking and achieving conservation goals require a balance between law enforcement actions against criminals and incentivising local communities and land owners to support wildlife. The need to ensure that local communities neighbouring protected areas are able to benefit legally from sustainable use of the country's fauna and flora is ongoing. Government and relevant NGOs need to identify innovative approaches for communities to participate in a conservation-based economy to improve local communities' attitude towards conservation and, in part, to also enhance the social capital needed to resist the benefits of involvement in illegal wildlife trade.

Low socio-economic conditions and basic infrastructure available to many of the communities living adjacent to protected areas and high-value wildlife species also contribute to the challenges. Many of the poor rural areas face service-delivery backlogs and inadequate access to basic services such as

health, education, roads and transport, police stations, water and sanitation, and electricity provision. High levels of unemployment and resentment around lack of access to protected areas may also contribute to involvement in wildlife trafficking. There is, therefore, a need for significant focus on provision of such services as part of the complex drivers behind the current situation. Efforts are also required to support local policing and general safety and security at a village level, including crime prevention strategies to address the impact of organised criminal networks associated with wildlife trafficking on rural communities.

Even though the NISCWT focuses primarily on the detection, investigation, prosecution and prevention of wildlife trafficking as a form of transnational organised crime, it is noted that other non-law enforcement initiatives should be undertaken, enhanced or increased by both government and non-government entities to increase the government's ability to reduce and prevent wildlife trafficking in South Africa. Non-law enforcement government departments and entities, such as the Department of Social Development, the Department of Health, Local Municipalities, and others, will have a direct role to play in the decrease in wildlife trafficking in South Africa.

7. NISCWT IMPLEMENTATION TIMEFRAMES

The NISCWT will be aligned to government's Medium Term Strategic Framework (MTSF) and Medium Term Expenditure Framework (MTEF). It will be implemented over a five-year period and divided into the following three time-based strategies:

- **Short-term strategy (2017–2019):** This will address what can be done by government and all other relevant role players in the first year of the NISCWT's approval and subsequent implementation that will have a direct impact on the government's objective (and ability) to prevent wildlife trafficking. It will include so-called "quick wins", as well as the enhancement of current law enforcement structures that will assist government in its ability to combat wildlife trafficking over the medium- and long-term periods.
- **Medium-term strategy (2018–2020):** This will address what can be done by government and all other relevant role players in the following three years of the NISCWT's implementation that will significantly increase the government's ability to combat wildlife trafficking. An example of a medium-term strategy could include the permanent establishment of specialised wildlife detector dog capacity at ports that did not have access to such capacity before.
- **Long-term strategy: (2017–2022 and beyond):** This will address what can be done by government and all other relevant role players in the first five years (and beyond) of the NISCWT's implementation that will significantly increase the government's ability to combat wildlife trafficking. An example of a long-term strategy could include the establishment of a national anti-wildlife trafficking unit within the SAPS.

The key performance areas (KPAs) linked to the above-mentioned timeframes are outlined in more detail in the NISCWT's implementation plan (Appendix A), which is briefly described below. It is also recommended that the NISCWT and its objectives, as well as specific focus and key performance areas be reviewed every five years. This will also mean the review of the NISCWT and necessary changes adopted subsequent to its completion in 2021.

8. MEASURING THE IMPACT OF THE NISCWT

There is a need to outline several measurable key performance areas to monitor and evaluate the impact of the implementation of the NISCWT on government's objective of reducing wildlife trafficking in South Africa, which will have to include the following:

- a) A significant increase in specialised (and permanent) law enforcement resources regarding the detection, combating and investigation of wildlife trafficking in South Africa (including a consolidated law enforcement strategy and entity within the SAPS which focuses solely on wildlife trafficking).
- b) A reduction in wildlife poaching numbers across the country and wildlife (fauna, flora and by-products) being smuggled out of and transiting through the country, focusing on rhinoceros, elephant, cycads and abalone as declared priority taxa over the first five years of the NISCWT's implementation.
- c) A significant increase in arrests and convictions relating to all wildlife trafficking matters and especially syndicate members along the entire illicit value chain, including a significant increase in the arrest and prosecution of higher level syndicate members.
- d) An increase in the number of criminal courts allocated to help prioritise wildlife trafficking matters.
- e) A significant increase in detection and seizure of illegal wildlife products – including at ports and along the borderline.
- f) A significant increase in the detection, arrest and prosecution of corrupt persons involved in wildlife trafficking.
- g) Developed, approved and implemented law enforcement, customs and intelligence cooperation agreements on wildlife trafficking (at operational and tactical levels) with transit countries, such as Mozambique, Zimbabwe, Tanzania and the United Arab Emirates (UAE), and market countries, such as China (including Hong Kong), Vietnam, Thailand and the UAE.

Quantitative specifics linked to some of the above-mentioned measurable areas are outlined in more detail in the NISCWT's implementation plan (Appendix A). These measurable key performance areas should be used by the government in measuring the effectiveness of the NISCWT's implementation.

9. CONCLUSION

The current rhinoceros poaching challenge in South Africa has illustrated how quickly a conservation issue can become securitised and develop into a national security issue in an environment where transnational organised crime issues are addressed as conservation rather than law enforcement issues. The current rhinoceros issue in South Africa could, however, be seen as just the beginning of a larger security threat facing the country, namely the challenge to effectively protect South Africa's wildlife resources from being targeted by international wildlife trafficking syndicates.

The effective implementation of the NISCWT will ensure that the country will significantly increase its ability to detect, investigate, arrest, prosecute and prevent wildlife trafficking in South Africa and beyond. It will also reduce corruption related to this form of transnational organised crime. Given that the effective implementation of the NISCWT will depend on the level of resources allocated to its implementation, it is imperative that all relevant government departments, especially the SAPS, elevate this strategy to a level of significant strategic importance.

APPENDIX A: NISCWT IMPLEMENTATION PLAN

The NISCWT Implementation Plan is an expansion of the three strategic objectives outlined in the NISCWT and unpacks these into secondary objectives that are linked to roles and responsibilities, measurable key performance areas and timeframes.

SECTION 1: STRATEGIC OBJECTIVES AND MEASURABLE KEY PERFORMANCE AREAS OF THE NISCWT				
STRATEGIC OBJECTIVE#1	Improving law enforcement, supported by the whole of government and society, to effectively investigate, prosecute and adjudicate wildlife trafficking as a form of transnational organised crime			
Secondary Objectives				Implementation Timeframes
1.1 Develop, approve, finance, implement and monitor a national integrated strategy to combat wildlife trafficking	Roles and Responsibilities		Responsible Departments: JCPS Cluster (NATJOINTS)	
			Support Role Players: The Presidency and all other government clusters and relevant instances	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	I. JCPS cluster to promote, through Cabinet and the Presidency, the prioritisation of wildlife trafficking as a national security threat that needs to be dealt with through a whole-of-government approach and endorsed through the implementation of the NISCWT	June 2017
			II. The Presidency and other relevant government leadership to sign off on the NISCWT and prioritise the implementation and resources required	June 2017
			III. SAPS to rename the NATJOINTS's National Priority Committee on Wildlife Crime to the Priority Committee on Wildlife Trafficking. This should include the establishment of SAPS-led PROVJOINTS committees on wildlife trafficking in all nine provinces	June 2017
			IV. NATJOINTS's Priority Committee on Wildlife Trafficking to effect and monitor the implementation of the NISCWT's strategic objectives	Ongoing
			V. NATJOINTS, supported by all relevant role players, to provide quarterly and annual progress reports to the Presidency and JCPS Cluster	Ongoing
		VI. Establishment of the NISCWT interdepartmental project and feedback provided in the annual reports of SAPS and other relevant departments	Annually	

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. Continuous monitoring and evaluation by means of quarterly reports (through NATJOINTS) and annual progress reports to the Presidency and JCPS II. Annual progress reports to be included in annual reports of SAPS and other departments for monitoring and evaluation purposes (to include interventions where required) III. Resources to be allocated to the implementation plan in a phased approach in line with the MTEF and MTSF and the JCPS Cluster’s Programme of Action for the cycle 	<p>Quarterly</p> <p>Annually</p> <p>Annually</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. Consolidated anti-wildlife trafficking unit, namely the National Anti-Wildlife Trafficking Unit (NAWTU), as proposed in Appendix B of the NISCWT, established and well resourced II. Review of NISCWT (2021), development of new NISCWT for 2021–2026 period (NISCWT revision to be included in SAPS Annual Report of 2021) 	<p>June 2019</p> <p>January 2022</p>
1.2 Increase effectiveness and coordination of intelligence collection and analysis on wildlife trafficking	Roles and Responsibilities		<p>Responsible Department: SAPS (Crime Intelligence Division)</p> <p>Support Role Players: NICOC, SSA, SANParks, FIC, SARS, SANDF (Defence Intelligence), DEA, PCAs and NGOs</p>	
	Key Performance Areas (KPA’s)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. Strategic intelligence coordination: NICOC to facilitate strategic intelligence support to the National Priority Committee on Wildlife Trafficking (NATJOINTS) in the following ways: <ul style="list-style-type: none"> a. Monthly Wildlife Trafficking Intelligence Working Group (WTIWG) meetings to coordinate strategic intelligence trends on wildlife trafficking in South Africa b. Provide integrated intelligence assessments on wildlife trafficking whenever the National Priority Committee on Wildlife Crime (NATJOINTS) meets c. Make recommendations to the above-mentioned priority committee on how to address the security risks identified regarding wildlife trafficking in South Africa d. SAPS CI to provide monthly reports to NICOC’s WTIWG on current trends, hotspots, smuggling routes, relevant security risks and challenges identified (national and provincial) regarding wildlife trafficking and its detection and prevention. Other role players are also expected to provide 	<p>July 2017</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p>

			<p>relevant strategic intelligence to the WTIWG to enhance its role and responsibilities towards the Priority Committee on Wildlife Trafficking. The IWG should also monitor and evaluate the level of information shared and coordination taking place at a provincial level on the topic</p>	
			<p>II. Operational and tactical intelligence coordination: SAPS CI to ensure that all provincial intelligence coordinating committees (ICCs) on the topic of wildlife trafficking are functioning effectively (including reviving/establishing where it is currently not happening) and providing the necessary support and guidance to the relevant PROVJOINTS committees. Other role players to provide information support to those committees. All provincial ICCs – through SAPS CI – should provide the following to the WTIWG on a monthly basis:</p>	July 2018
			<p>a. Current provincial rhinoceros, abalone, ivory and cycad poaching and smuggling trends, criminal intentions, <i>modus operandi</i> and hotspots</p>	Monthly
			<p>b. Operational successes and challenges relating to wildlife trafficking</p>	Monthly
			<p>III. Information access, collection and sharing by non-intelligence mandated departments/entities: Certain government and non-government role players have access to information on wildlife trafficking that can assist SAPS in their criminal intelligence gathering and analysis processes. Such information should be provided to the relevant intelligence coordination structures (e.g. WTIWG and ICCs) by means of:</p>	Ongoing
			<p>a. National and provincial mechanisms (NATJOINTS and PROVJOINTS) to access wildlife trafficking information from government and non-government role players, inclusive of provincial liaison points where anyone can share tactical or operational information (e.g. a hotline or SAPS nodal point)</p>	Ongoing
			<p>b. Directing all official requests for intelligence relating to wildlife trafficking to the relevant WTIWG or Provincial ICCs</p>	Ongoing
			<p>IV. SSA, DEA, SANParks, PCA and SARS to share all information obtained (e.g. seizures and smuggling trends) on suspected trafficking syndicates linked to wildlife trafficking with SAPS CI</p>	Ongoing
			<p>V. SAPS, in conjunction with DIRCO, to establish a domestic operational law</p>	July 2018

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

			<p>enforcement forum on the combating of wildlife trafficking with representatives from diplomatic missions (e.g. transit countries, illicit market countries and countries with successful wildlife trafficking combating initiatives)</p> <p>VI. Continuous forewarning information by all relevant role players to be provided to SAPS in time to effectively operationalise</p>	Ongoing
		Medium Term (2018–2020)	<p>I. SSA to continue with foreign intelligence gathering and liaison in terms of wildlife trafficking – to be liaised with SAPS on an <i>ad hoc</i> and ongoing basis</p> <p>II. SAPS CI and SSA to create a dedicated integrated analysis capacity (task team/desk), including human and technological resources, to provide operational and analysis support to SAPS on an interim basis until NAWTU is established. The focus of analysis should include national investigations and interprovincial and transnational wildlife trafficking syndicates</p> <p>III. Quarterly meetings on the topic of wildlife trafficking to be held between relevant enforcement agencies (SAPS, Customs, etc.) and all relevant diplomatic representatives stationed in South Africa</p> <p>IV. SAPS to establish a domestic operational law enforcement forum on the combating of wildlife trafficking with representatives from diplomatic missions – to meet once a quarter (SAPS-led, in conjunction with DIRCO)</p>	<p>Ongoing</p> <p>March 2018</p> <p>Quarterly</p> <p>Quarterly</p>
		Long Term (2017–2022)	<p>I. Consolidated Anti-Wildlife Trafficking Unit (NAWTU) established – responsible for intelligence analysis and liaison on the issue of wildlife trafficking – to be supported by all relevant government role players</p> <p>II. All relevant government role players to share all available intelligence/information with the newly established NAWTU to consolidate all intelligence on wildlife trafficking in the country into one centralised database</p> <p>III. Quarterly meetings with established domestic operational law enforcement forum on the combating of wildlife trafficking with representatives from diplomatic missions (NAWTU-led, in conjunction with DIRCO)</p>	<p>June 2019</p> <p>June 2019</p> <p>Quarterly</p>
1.3 Improve and enhance law enforcement capacity to	Roles and Responsibilities	<p>Responsible Department: SAPS</p> <p>Support Role Players: All relevant government and non-government role players</p>		

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

investigate wildlife trafficking	Key Performance Areas (KPA's)	Short Term (2017–2018)	<p>I. Audit and recommendations in terms of capacity regarding the current resource requirements (human, skills and technological resources), especially in the DPCI, to address the issue of wildlife trafficking investigation in South Africa (CSIR to play a support role)</p> <p>II. Implementation and finance audit findings</p> <p>III. SAPS and SSA to prioritise the expansion of foreign language interpretation capacity (specifically those languages linked to transit and market countries)</p> <p>IV. SAPS to approach leading wildlife trafficking research organisations to conduct a national research project on wildlife trafficking from the country – including trends, <i>modus operandi</i>, challenges and international best practices regarding its prevention</p> <p>V. SAPS, specifically DPCI, to officially adopt a multidepartmental approach to all wildlife trafficking investigation to enhance specialised skills within its investigation capacity, inclusive of Service Level Agreements (SLAs), Memoranda of Understanding (MOUs) and Protocols to ensure an interdepartmental cooperative approach</p> <p>VI. Forensic capacity established/enhanced in SAPS which specifically focuses on wildlife trafficking, including resources to analyse biological, ballistic and electronic forensics. Use should be made of the forensic capacity of other role players, such as FIC, CSIR, SARS and SSA</p> <p>VII. Significant increase in EMI resources allocated to DEA (and relevant PCAs) to support SAPS investigations</p> <p>VIII. FIC to benchmark international best practices regarding financial intelligence gathering and analysis initiatives linked to wildlife trafficking</p> <p>IX. FIC to increase financial intelligence analysis capacity on identifying illicit money flows and proceeds of crimes linked to wildlife trafficking, which will lead to an increase in FIC resource allocation to SAPS investigations</p>	<p>December 2017</p> <p>March 2018</p> <p>December 2017</p> <p>December 2017</p> <p>December 2017</p> <p>March 2018</p> <p>March 2018</p> <p>December 2017</p> <p>March 2018</p>
		Medium Term (2018–2020)	<p>I. Implementation of above-mentioned audit recommendation upon approval – resulting in the consolidation and resourcing of specialised investigation capacity on wildlife trafficking</p> <p>II. Ongoing specialised training provided to SAPS (at all levels) and other law enforcement role players involved in the investigation of wildlife trafficking</p> <p>III. Significant increase in EMI resources allocated to DEA to support SAPS investigations</p> <p>IV. SAPS to continue using a multidepartmental approach to all wildlife trafficking</p>	<p>March 2019</p> <p>Ongoing</p> <p>March 2019</p> <p>Ongoing</p>

			<p>investigations</p> <p>V. Effective FIC and SARS support to SAPS investigations into financial matters related to wildlife trafficking</p> <p>VI. Efficient forensic investigative capacity established in SAPS, including resources to analyse biological, ballistic and electronic forensics, which should also include the use of forensic capacity of other role players, such as FIC, CSIR, SARS and SSA</p>	<p>Ongoing</p> <p>March 2019</p>
		Long Term (2017–2022)	<p>I. Consolidated, well-resourced, National Anti-Wildlife Trafficking Unit (NAWTU) established in SAPS, responsible for all forms of investigations on the issue of wildlife trafficking in South Africa</p> <p>II. NAWTU to chair the NATJOINTS's Priority Committee on Wildlife Trafficking</p> <p>III. Sufficient resource support allocation to NAWTU by relevant specialised role players to assist on matters such as financial and forensic investigations</p>	<p>June 2019</p> <p>Ongoing</p> <p>Ongoing</p>
1.4 Increase anti-corruption investigations linked to wildlife trafficking	Roles and Responsibilities		<p>Responsible Department: SAPS</p> <p>Support Role Players: NPA, DOJ & CD, DEA, SANParks, PCAs, SSA, SARS, GCIS and FIC</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<p>I. An intelligence-driven national anti-corruption investigative approach (including lifestyle audits) to be initiated within SAPS to focus on wildlife trafficking – supported by all role players</p> <p>II. Corruption trends reported at NATJOINTS level should be shared with the Anti-Corruption Task Team (ACTT)</p> <p>III. SAPS to establish a mechanism (e.g. nodal point/forum) for reporting information on alleged corruption linked to wildlife trafficking</p>	<p>December 2017</p> <p>Ongoing</p> <p>December 2017</p>
		Medium Term (2018–2020)	<p>I. Monitoring and assessment of the arrests and prosecutions following the intelligence-driven approach and communication of successes to help deter corruption – to be communicated quarterly by SAPS to NATJOINTS and the public via an SAPS media campaign, to be assisted by the Government Communication and Information System (GCIS)</p> <p>II. Corruption trends reported at NATJOINTS level should be shared with the Anti-Corruption Task Team (ACTT)</p> <p>III. SAPS to manage a mechanism (e.g. nodal point/forum) for reporting information on alleged corruption linked to wildlife trafficking</p>	<p>Quarterly</p> <p>Quarterly</p> <p>Ongoing</p>

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

		Long Term (2017–2022)	<p>I. NAWTU – once established – is required to also focus on all corruption-related aspects pertaining to wildlife trafficking and to be supported by all relevant government departments and NGOs</p> <p>II. NAWTU to establish a public liaison forum (both national and provincial) where information can be shared on suspected corrupt activities linked to wildlife trafficking</p>	<p>June 2019</p> <p>June 2019</p>
1.5 Improving and enhancing the government’s ability to prosecute and adjudicate wildlife trafficking as a form of transnational organised crime	Roles and Responsibilities		<p>Responsible Department: DOJ & CD</p> <p>Support Role Players: NPA, SAPS, DEA and PCAs</p>	
	Key Performance Areas (KPA’s)	Short Term (2017–2018)	<p>I. DOJ & CD and NPA to prioritise the prosecution and adjudication of wildlife trafficking matters, which should include:</p> <p>a. Increase in dedicated capacity to prosecute and adjudicate wildlife trafficking cases (including dedicated courts). DOJ & CD and NPA to conduct a needs assessment in relation to this objective</p> <p>b. Implementation of the findings of the needs assessment accordingly, which should include the following known hotspots:</p> <ul style="list-style-type: none"> • Mpumalanga, Limpopo, North West and KwaZulu-Natal (rhinoceros horn trafficking) • Western and Eastern Cape (abalone trafficking) • Gauteng (wildlife trafficking through major ports of entry and transit routes) <p>II. SAPS should develop a directive (as part of its standard operating procedures) that offenders in relation to these types of crimes should be appropriately charged and investigations should be focused on dealing with wildlife trafficking as a serious organised crime</p> <p>III. DEA to continue its training support to prosecution authority and awareness campaigns to presiding officers on issues linked to wildlife crime</p>	<p>December 2017</p> <p>December 2017</p> <p>March 2018</p> <p>December 2017</p> <p>Ongoing</p>
		Medium Term (2018–2020)	<p>I. DOJ & CD to continue to establish dedicated court capacity and NPA to continue to provide prosecution capacity in other areas/regions where necessary in conjunction with the hotspots mentioned above</p>	Ongoing

			<ul style="list-style-type: none"> II. DOJ & CD to supply vetted and sufficient foreign language interpretation capacity, including languages used by foreign nationals from all identified transit and market countries, to enable the NPA to effectively prosecute and adjudicate foreign nationals involved in wildlife trafficking in South Africa III. DEA to continue its training support to prosecution authority and awareness campaigns to presiding officers on issues linked to wildlife crime 	<p>March 2018</p> <p>Ongoing</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. NPA to have increased its national prosecution capacity to not only effectively support the investigations element of the proposed consolidated anti-wildlife trafficking unit that will be established (NAWTU), but to also play a coordinating and prosecution-guided investigation role regarding interprovincial and transnational cases II. DEA to continue its training support to prosecution authority and awareness campaigns to presiding officers on issues linked to wildlife crime 	<p>December 2019</p> <p>Ongoing</p>
1.6 Prioritising wildlife trafficking crime statistics into the national crime statistics	Roles and Responsibilities		<p>Responsible Department: SAPS</p> <p>Support Role Players: DEA and PCAs</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. SAPS to initiate a policy development process to prioritise wildlife trafficking as a serious crime category within its national crime statistics database II. SAPS to determine what crimes, by definition, should be linked and reported on under this crime category/trend, which could include facets such as poaching, possession, smuggling, trespassing, racketeering, corruption linked to this form of organised crime and seizures at ports, and which should subsequently be captured on the Crime Administration System (CAS) under the category “wildlife trafficking”. These crime statistics should be differentiated from conservation-related statistics collected by DEA III. SAPS to become the official communicator regarding wildlife trafficking statistics and conviction rates IV. Information deriving from this newly established crime category called “wildlife trafficking” should be collated as a specific data subset to be used for operational and communication purposes V. SAPS to provide information support to other government role players regarding information requests on wildlife trafficking incidence trends. This should include rendering wildlife trafficking trends to DEA, which is responsible 	<p>December 2017</p> <p>December 2017</p> <p>December 2017</p> <p>Ongoing</p> <p>Ongoing</p>

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

			for reporting on linked issues to regional and international wildlife conservation structures such as CITES	
		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. Wildlife trafficking included as a serious crime category in the SAPS’s CAS crime reporting system II. Information deriving from the newly established CAS crime category called “wildlife trafficking” should be collated as a specific data subset to be used for operational and communication purposes III. SAPS to report on wildlife trafficking as part of its national annual crime statistics overview IV. SAPS to provide information support to other government role players regarding information requests on wildlife trafficking statistics 	<p>March 2018</p> <p>Ongoing</p> <p>Annually</p> <p>Ongoing</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. Newly established NAWTU to be the unit in SAPS responsible for the monitoring of and reporting on local, provincial and national trends regarding wildlife trafficking statistics 	June 2019
1.7 SAPS to enhance cooperation and collaboration with non-governmental organisations and private security structures	Roles and Responsibilities		<p>Responsible Department: SAPS</p> <p>Support Role Players: DEA, SANParks, PCAs and NGOs</p>	
	Key Performance Areas (KPA’s)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. SAPS to establish a national and provincial public liaison forum with identified non-government entities on the topic of wildlife trafficking: <ul style="list-style-type: none"> a. To meet quarterly to exchange information and build cooperative relations on the topic b. Quarterly feedback by SAPS to be provided to NATJOINTS/PROVJOINTS on information/challenges provided/reported by public liaison forums II. SAPS – in conjunction with DEA and NGOs – to develop a standard species identification and wildlife trafficking training module to be rolled out to relevant law enforcement agencies at a precinct/ports of entry level III. SAPS to develop MOUs with prominent wildlife conservation entities regarding resource and research support on the issue of wildlife trafficking 	<p>September 2017</p> <p>Quarterly</p> <p>Quarterly</p> <p>March 2018</p> <p>March 2018</p>

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

		Medium Term (2018–2020)	I. Quarterly national and provincial public liaison forum meetings facilitated by SAPS on the topic of wildlife trafficking	Quarterly
		Long Term (2017–2022)	I. National “Public Liaison Forum” established and managed by newly established NAWTU II. Secure information channel/mechanism/nodal point established in NAWTU to ensure constant information sharing and operational cooperation from/with NGOs	June 2019 June 2019
1.8 Government to consolidate all law enforcement investigation and intelligence initiatives to specifically focus on the combating of wildlife trafficking in South Africa	Roles and Responsibilities		Responsible Department: SAPS Support Role Players: All relevant government departments	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	I. Approval by SAPS management that there is a need to consolidate wildlife trafficking investigation resources to overcome the current challenge of fragmentation II. SAPS to complete a work study on the centralisation of law enforcement initiatives regarding the prevention, combating and investigation of wildlife trafficking syndicates and activities	June 2017 March 2018
		Medium Term (2018–2020)	I. SAPS to develop the necessary institutional development plan regarding the establishment of a consolidated anti-wildlife trafficking unit (NAWTU) within SAPS, which will include: a. Organisational framework, legislative mandate and standard operating procedures of the unit b. Resource requirements (personnel strength and skills) II. SAPS to implement institutional development plan	September 2018 January 2019
		Long Term (2017–2022)	I. Consolidated Anti-Wildlife Trafficking Unit (NAWTU) established and resourced to effectively comply with its mandate II. Review of NAWTU focus areas (specific wildlife taxa to be prioritised) to take place on an annual basis	June 2019 Annually

STRATEGIC OBJECTIVE #2	Increasing the government's ability to detect, prevent and combat wildlife trafficking in South Africa and beyond			
Secondary Objectives			Implementation Timeframes	
2.1 Significantly reduce the risk of wildlife-related corruption	Roles and Responsibilities		Responsible Department: SAPS Support Role Players: DEA, SARS, SSA, SANParks, PCAs and NGOs	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	I. SAPS CI – in conjunction with DEA and SSA – to develop a national risk assessment regarding the link between corruption and wildlife trafficking (<i>modus operandi</i> , trends, security loopholes, lifestyle audits, etc.) and to make recommendations in mitigating those risks/security loopholes	December 2017
		Medium Term (2018–2020)	I. SAPS and other government role players implement recommendations made in above-mentioned risk assessment II. SAPS to develop and implement a national anti-corruption campaign to be rolled out at all commercial ports and identified wildlife reserves/parks III. SAPS to increase intelligence gathering and investigative resources on suspected/known/detected government officials linked to wildlife trafficking	June 2018 March 2018 Ongoing
		Long Term (2017–2022)	I. Consolidated Anti-Wildlife Trafficking Unit (NAWTU) established and responsible for the detection and investigation of corruption linked to wildlife trafficking	June 2019
2.2 Increase focus on transport routes, informal and private landing strips and illegal border crossing points linked to wildlife trafficking	Roles and Responsibilities		Responsible Department: SAPS Support Role Players: Road Traffic Management Corporation, Metro Police Departments, SANDF, SARS (Customs), SANParks and PCAs	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	I. SAPS CI, with the assistance of the Border Police component, to develop intelligence product directing targeted operations on transport routes, landing strips and border crossing points known to be used by wildlife trafficking syndicates II. DEA to initiate awareness campaign with traffic management structures	October 2017 March 2018

		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. Quarterly <i>ad-hoc</i> law enforcement (intelligence-led) operations in all nine provinces targeting known/detected wildlife trafficking routes and border crossing points (NATJOINTS to enforce and monitor) II. DEA to continue with awareness campaign with traffic management structures 	<p>Quarterly</p> <p>Ongoing</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. NATJOINTS Priority Committee on Wildlife Trafficking to operationalise and monitor national and provincial <i>ad-hoc</i> law enforcement operations targeting known/detected wildlife trafficking routes and border crossing points II. SAPS CI to develop annual intelligence assessment on trends, <i>modus operandi</i> and hotspots regarding the use of transport routes and border crossing points used by wildlife trafficking syndicates 	<p>Ongoing</p> <p>Annually</p>
2.3 Increased crime prevention initiatives in and around communities adjacent or linked to poaching hotspots	Roles and Responsibilities		<p>Responsible Department: SAPS</p> <p>Support Role Players: JCPS Cluster, DEA, SANParks, PCAs and other support role players</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. SAPS CI, supported by NICOC, SANDF DI, SSA, DEA and SANParks to develop a national intelligence assessment on current wildlife poaching and smuggling hotspots, and which communities linked to these hotspots should be targeted II. NATJOINTS to operationalise hotspots identified in above-mentioned intelligence assessment III. DEA, SANParks and PCAs, with the assistance of SAPS and SSA, to establish a national project which will result in a national security risk assessment being conducted on all identified government wildlife parks/reserves (including issues such as perimeter security measures – which are linked to exit and entrance points community members use to commit acts of wildlife trafficking), with the purpose of: <ul style="list-style-type: none"> a. Identifying security loopholes/threats/challenges b. Recommending on how security challenges/loopholes/challenges should be mitigated 	<p>December 2017</p> <p>Quarterly</p> <p>March 2018</p>

		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. <i>Ad-hoc</i> quarterly national crime prevention operations planned and executed by NATJOINTS (National Priority Committee on Wildlife Trafficking) II. Increased intelligence gathering by SAPS CI and other role players regarding the involvement of community members in wildlife trafficking (identification of linked communities and individuals to be targeted) III. SANParks and PCAs to implement recommendations from above-mentioned security risk assessment 	<p>Quarterly</p> <p>Ongoing</p> <p>March 2019</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. <i>Ad-hoc</i> quarterly crime prevention operations planned and executed by NATJOINTS (National Priority Committee on Wildlife Trafficking) II. Increased intelligence gathering by SAPS CI and other role players regarding the involvement of community members in wildlife trafficking (identification of linked communities and individuals to be targeted) III. NAWTU to be given access to SANParks and PCAs' security technology (surveillance) and databases (information collection) 	<p>Quarterly</p> <p>Ongoing</p> <p>September 2019</p>
2.4 Improve detection and prevention of wildlife trafficking through ports	Roles and Responsibilities		<p>Responsible Department: DEA, DAFF and SARS</p> <p>Support Role Players: SAPS, SSA and NGOs</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. DEA to investigate the possibility of restricting designated CITES ports of entry and exit in the country for wildlife and wildlife by-products to one seaport, one airport and one port each with neighbouring countries (Namibia, Botswana, Zimbabwe, Mozambique, Swaziland and Lesotho) II. DEA to develop, approve and finance a developmental plan in the department to significantly increase its Environmental Management Inspector (EMI) capacity at all designated ports of entry and exit in the country III. SARS to increase its national capacity regarding wildlife trafficking detection within its Detector Dog Unit (DDU) to 40 wildlife trafficking detection dogs IV. SARS to include wildlife trafficking as a national priority in its national customs risk model V. SAPS and SSA to increase their intelligence gathering capacity and focus on the issue of wildlife trafficking at ports of entry – including the identification of corrupt officials posted at these ports VI. SAPS and SARS (Customs) to benchmark international best practices – including policies, standard operating procedures and the use of technology – to 	<p>December 2017</p> <p>March 2018</p> <p>March 2018</p> <p>December 2018</p> <p>March 2018</p> <p>March 2018</p>

			<p>enhance their capability to detect wildlife trafficking through ports. Benchmark reports to be presented by SAPS and SARS to NATJOINTS Priority Committee on Wildlife Trafficking</p> <p>VII. SAPS and DEA to establish a national media campaign project on the risks of being involved in wildlife trafficking (including corrupt activities) to be rolled out at all major air, land and marine ports – targeting local and foreign nationals travelling through these ports. This will include:</p> <p>a. Approval form SAPS and DEA principals on campaign and funding allocated to the campaign</p> <p>b. Expert media consultant/service provider appointed to develop the campaign</p> <p>c. Campaign developed and approved by SAPS and DEA principals</p>	<p>March 2018</p> <p>December 2017</p> <p>March 2018</p> <p>March 2018</p>
		Medium Term (2018–2020)	<p>I. DEA and DAFF (alternatively the newly established BMA) to ensure sufficient wildlife trafficking detection resources (such as the DEA’s EMI) are located at the following major ports:</p> <p>a. Airports: King Shaka, Port Elizabeth and Cape Town airports</p> <p>b. Harbours: Durban, Cape Town and Port Elizabeth harbours</p> <p>c. Land ports: Beitbridge and Lebombo land ports</p> <p>II. SARS to increase its national capacity regarding wildlife trafficking detection within its DDU to:</p> <p>a. Have 70 wildlife trafficking detection dogs</p> <p>b. Permanent dog kennels established at King Shaka International Airport, Lanseria International Airport and Cape Town International Airport</p> <p>III. SAPS and SSA to increase their intelligence gathering capacity and focus on the issue of wildlife trafficking at ports of entry – including the identification of corrupt officials posted at these ports</p> <p>IV. Monthly <i>ad-hoc</i> joint wildlife trafficking detection operation, led by SAPS and supported by SARS, DEA, DAFF and SSA, at the following ports over this period (feedback to be reported to NATJOINTS on a monthly basis):</p>	<p>September 2018</p> <p>September 2018</p> <p>March 2018</p> <p>Monthly</p>

			<p>a. Airports: OR Tambo, King Shaka, Cape Town and Lanseria airports</p> <p>b. Harbours: Cape Town and Durban harbours</p> <p>c. Land ports: Beitbridge and Lebombo land ports</p>	
			V. SAPS and SARS to implement recommendations from above-mentioned international benchmarking exercises regarding wildlife trafficking detection at ports. Feedback to be presented to NATJOINTS	March 2019
			VI. National media campaign by SAPS and DEA at all major ports rolled out	June 2018
		Long Term (2017–2022)	<p>I. DEA and DAFF (alternatively the newly established BMA) to either establish or increase wildlife trafficking detection resources (such as the DEA’s EMI) at the following ports of entry (to serve as a regional roving capacity) as required:</p> <p>a. Airports: Richards Bay, Kruger Mpumalanga and Port Elizabeth airports</p> <p>b. Harbours: Richards Bay, East London and Mosselbay harbours</p> <p>c. Land ports: Violsdrift, Ramatlabama, Maseru Bridge, Oshoek, Kosie Bay, Pafuri and Giryando land ports</p>	September 2019
			<p>II. At least one <i>ad-hoc</i> joint wildlife trafficking detection operation per quarter, led by SAPS and supported by SARS, DEA, DAFF and SSA, at the following ports of entry over this period:</p> <p>a. Airports: OR Tambo, King Shaka, Cape Town, Lanseria, Port Elizabeth, East London, Mpumalanga Kruger and Richards Bay airports</p> <p>b. Harbours: Cape Town, Durban, Knysna, Port Elizabeth, East London, Mosselbay and Richards Bay harbours</p> <p>c. Land ports: Beitbridge, Lebombo, Kosie Bay, Violsdrift and Oshoek land ports</p>	September 2019
			III. All information collected/arrests made in the above-mentioned operations to be shared with NAWTU as the lead agency regarding the investigation of wildlife trafficking	September 2019
			<p>IV. SARS to increase its national capacity regarding wildlife trafficking detection within its DDU to:</p> <p>a. Have 100 wildlife trafficking detection dogs</p>	September 2019

			<p>b. Permanent dog kennels established at the Durban, Cape Town and Richards Bay harbours</p> <p>V. Improved and enhanced detection procedures and technology used by SAPS and SARS to detect wildlife trafficking through the country's ports</p> <p>VI. Ongoing media campaign by SAPS and DEA at all major ports on the risks of being involved in wildlife trafficking in South Africa</p>	<p>March 2018 to March 2021</p> <p>Ongoing</p>
2.5 Consolidate and increase wildlife compliance and enforcement	Roles and Responsibilities		<p>Responsible Department: DEA</p> <p>Support Role Players: SANParks, PCAs, SAPS, SSA and NGOs</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<p>I. DEA and PCAs to increase their wildlife compliance and enforcement resources significantly, both nationally and provincially (also indicated in 2.4 of the implementation plan)</p> <p>II. DEA to initiate a policy and legislative development process (including a review of constitutional mandates) to move towards the national consolidation of all forms of wildlife compliance and enforcement, including permitting, databases, investigations, etc.</p> <p>III. DEA, SANParks and PCAs, with the assistance of SAPS and SSA, to establish a national project which will result in a national security risk assessment being conducted on all identified government wildlife parks, with the purpose of:</p> <p>a. Identifying security loopholes/threats/challenges</p> <p>b. Recommending on how security challenges/loopholes/challenges should be mitigated</p>	<p>March 2018</p> <p>March 2018</p> <p>March 2018</p>
		Medium Term (2018–2020)	<p>I. DEA and PCAs to increase their wildlife compliance and enforcement resources significantly, both nationally and provincially (also indicated in 2.4 of the implementation plan)</p> <p>II. Review of compliance and enforcement legislation results in the consolidation of wildlife compliance and enforcement processes as well as reporting on and to a national level authority (DEA)</p> <p>III. National consolidated wildlife compliance and enforcement database established</p> <p>IV. SAPS to be given access to above-mentioned database</p>	<p>March 2019</p> <p>June 2018</p> <p>September 2018 November 2018</p>

		Long Term (2017–2022)	<ul style="list-style-type: none"> I. DEA to provide efficient resources to assist the proposed NAWTU to fulfil its mandate II. NAWTU to have access to national wildlife compliance and enforcement database 	<p>June 2019</p> <p>Ongoing</p>
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STRATEGIC OBJECTIVE #3	Increasing national, regional and international law enforcement collaboration and cooperation on combating wildlife trafficking			
Secondary Objectives				Implementation Timeframes
3.1 Diplomatic position on wildlife trafficking to reflect the issue as a national security priority	Roles and Responsibilities		Responsible Department: DIRCO	
			Support Role Players: SAPS, DEA, DOJ & CD and SSA	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. DIRCO should continue to support the UN's General Assembly Resolution A/69/L.90 on wildlife trafficking, which recognises the role of the United Nations Convention against Transnational Organised Crime (UNTOC) and the United Nations Convention against Corruption (UNCAC), under the auspices of the Commission on Crime Prevention and Criminal Justice (CCPCJ), as “effective tools” against illicit trade II. DIRCO, in conjunction with the relevant technical departments, should work towards establishing mutual legal assistance agreements with the other co-sponsors of this resolution (especially transit and market countries), as UNTOC operates on the principle of mutual legal assistance – which should include the topic of wildlife trafficking as a form of transnational organised crime III. DIRCO to provide quarterly feedback to NATJOINTS on the matter 	<p>Ongoing</p> <p>Ongoing</p> <p>Quarterly</p>
		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. DIRCO should continue to support the UN's General Assembly Resolution A/69/L.90 on wildlife trafficking, which recognises the role of the United Nations Convention against Transnational Organised Crime (UNTOC) and the United Nations Convention against Corruption (UNCAC), under the auspices of the Commission on Crime Prevention and Criminal Justice (CCPCJ), as “effective tools” against illicit trade II. DIRCO, in conjunction with the relevant technical departments, should work 	<p>Ongoing</p> <p>Quarterly</p>

			towards establishing mutual legal assistance agreements with the other co-sponsors of this resolution (especially transit and market countries), as UNTOC operates on the principle of mutual legal assistance – which should include the topic of wildlife trafficking as a form of transnational organised crime III. DIRCO to provide quarterly feedback to NATJOINTS on the matter	Quarterly
		Long Term (2017–2022)	I. DIRCO, in conjunction with the relevant technical departments, including the newly established NAWTU, should continue to work towards establishing mutual legal assistance agreements on the issue of wildlife trafficking through its bilateral and multilateral engagements	Ongoing
3.2 Strengthen law enforcement cooperation with relevant countries	Roles and Responsibilities		Responsible Department: SAPS Support Role Players: DIRCO, DEA, SARS, FIC, SANParks and SSA	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	I. SAPS, supported by DIRCO, DEA and SSA, to establish and implement joint law enforcement projects on wildlife trafficking with the following countries: a. Transit countries: Mozambique, Zimbabwe, Botswana and Namibia b. Market countries: China (including Hong Kong) and Vietnam II. SAPS to establish a domestic operational law enforcement forum on combating wildlife trafficking with representatives from diplomatic missions – to meet once a quarter (SAPS-led, in conjunction with DIRCO) III. SAPS to increase its use of Interpol notices on the topic of wildlife trafficking. Feedback to be reported to the NATJOINTS Committee on Wildlife Trafficking	March 2018 September 2017 Ongoing
		Medium Term (2018–2020)	I. SAPS to establish and implement joint law enforcement projects on wildlife trafficking with the following countries: a. Transit countries: Tanzania, Kenya, UAE, Czech Republic and Singapore b. Market countries: Thailand and Laos II. Quarterly meetings on the topic of wildlife trafficking held between SAPS and all relevant domestic diplomatic representatives stationed in South Africa III. SAPS to make use of Interpol notices on the topic of wildlife trafficking. Feedback to be reported to the NATJOINTS Committee on Wildlife Trafficking	March 2019 Quarterly Ongoing

		Long Term (2017–2022)	<ul style="list-style-type: none"> I. Consolidated Anti-Wildlife Trafficking Unit established (NAWTU) – responsible for intelligence gathering, analysis and liaison with foreign law enforcement role players on the issue of wildlife trafficking II. Quarterly meetings on the topic of wildlife trafficking held between NAWTU and all relevant domestic diplomatic representatives stationed in South Africa III. NAWTU to make use of Interpol notices on the topic of wildlife trafficking. Feedback to be reported to the NATJOINTS Committee on Wildlife Trafficking 	<p>June 2019</p> <p>Quarterly</p> <p>Ongoing</p>
3.3 Benchmark global best practices regarding wildlife trafficking investigations and prevention	Roles and Responsibilities		<p>Responsible Department: SAPS</p> <p>Support Role Players: DEA, SANParks, SSA and SARS</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. SAPS to benchmark at least one international best practice example regarding operational methods in combating wildlife trafficking II. SAPS to provide benchmark report to NATJOINTS Priority Committee on Wildlife Trafficking 	<p>March 2018</p> <p>March 2018</p>
		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. SAPS to benchmark at least two international best practice examples regarding the establishment of a consolidated wildlife trafficking policing structure – as has been done abroad II. SAPS to provide benchmark reports to NATJOINTS Priority Committee on Wildlife Trafficking 	<p>March 2018 and February 2019</p> <p>May 2018 and April 2019</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. Benchmarking global best practices has guided the SAPS's objective of establishing a consolidated anti-wildlife trafficking unit (NAWTU) 	<p>March 2018 and February 2019</p>
3.4 SAPS to play an increased role in regional and international wildlife trafficking combating initiatives	Roles and Responsibilities		<p>Responsible Departments: SAPS and DEA</p> <p>Support Role Players: DEA, DIRCO, SSA and SARS</p>	
	Key Performance Areas (KPA's)	Short Term (2017–2018)	<ul style="list-style-type: none"> I. SAPS and DEA to determine where and what role SAPS must play regarding regional and international wildlife trafficking combating initiatives – feedback on the way forward on this matter to be reported to NATJOINTS Priority Committee on Wildlife Trafficking and SAPS/DEA principals for approval II. SAPS to provide the necessary resources – including skilled and specialised personnel – to comply with this need 	<p>December 2017</p> <p>March 2018</p>

National Integrated Strategy to Combat Wildlife Trafficking (NISCWT)
February 2017 – Version 4

		Medium Term (2018–2020)	<ul style="list-style-type: none"> I. SAPS, in conjunction with DEA, starts representing the South African government in a joint venture at all relevant regional and international wildlife trafficking combating forums II. SARS and SSA to assist SAPS and DEA, where necessary, in increasing the role government plays in international wildlife trafficking initiatives 	<p>March 2018</p> <p>Ongoing</p>
		Long Term (2017–2022)	<ul style="list-style-type: none"> I. Consolidated Anti-Wildlife Trafficking Unit (NAWTU) established – responsible for SAPS's involvement and responsibilities regarding participation of the country's law enforcement in regional and international wildlife trafficking combating initiatives 	<p>June 2019</p>

APPENDIX B: PROPOSED CONSOLIDATED WILDLIFE TRAFFICKING LAW ENFORCEMENT UNIT

During the development of the NISCWT, all role players (government and non-government) identified the need to consolidate the country's law enforcement resources into a centralised and specialised policing structure responsible for the detection, investigation, combating of and international collaboration on the topic of wildlife trafficking in South Africa. This specifically emerged from challenges that were identified in relation to the current law enforcement initiatives linked to the investigation and prevention of wildlife trafficking, which for example included the following:

- Lacking law enforcement resources specialising in wildlife trafficking (insufficient resources to mitigate the current threat).
- Severe fragmentation of the current law enforcement role players focused on intelligence gathering, criminal investigation and combating of wildlife trafficking.
- Too many role players being mandated to address this issue, which has resulted in a conflict of mandates and no clear leadership from a law enforcement point of view.
- Absence of a centralised national database of intelligence on the issue of wildlife trafficking (fragmented in different departments).
- Non-existence of a central and controlled law enforcement entry point at national and provincial levels for the sharing of information, for example, by the wildlife sector and NGOs.

The NISCWT, therefore, developed a proposed framework for the establishment of a consolidated and centralised national, specialised wildlife trafficking combating law enforcement structure within the SAPS (to be duplicated at provincial level). The advantages of establishing such a structure has been assessed to be as follows:

- It will reduce bureaucratic delays and obstacles linked to the current fragmented approach towards combating wildlife trafficking.
- It will result in one centralised and mandated law enforcement authority for the detection and investigation of wildlife trafficking. This will, subsequently, lead to one entry and exit point regarding wildlife trafficking matters in South Africa – which will enhance the government's ability to coordinate its initiatives to reduce the phenomenon, given that NISCWT requires an integrated approach where secondary role players will be expected to assist the SAPS.

- It will result in the establishment of a nationally centralised and coordinated intelligence structure and database on the issue of wildlife trafficking (which will enhance the SAPS's ability to more effectively initiate intelligence-led investigations into wildlife trafficking). This will also result in the establishment of only one entry and exit point regarding the sharing of intelligence on wildlife trafficking.
- It will increase the government's ability to combat wildlife trafficking outside the country's wildlife parks/reserves, which will assist the DEA and entities such as SANParks and the PCAs to increasingly turn back their focus to their mandate of conservation and wildlife compliance and law enforcement.
- This will increase the SAPS's ability (and government's as a whole) to monitor and evaluate its wildlife trafficking combating initiatives (including the implementation of the NISCWT) as there will be only one lead law enforcement role player instead of numerous secondary role players trying to achieve the same goal. This will, therefore, increase the possibility of accountability.
- It will simplify financial management of the government's wildlife trafficking combating initiatives, as there will be one centralised budget regarding the combating of wildlife trafficking (which should include the issue of external funding).
- It will increase the government's ability to implement an interdepartmental project-based approach towards investigating wildlife trafficking, as there will be one primary role player leading the project, with secondary role players written into the project from its inception.

As outlined in the NISCWT Implementation Plan (Appendix A), the SAPS should, firstly, seek approval of relevant SAPS management structures regarding a need to consolidate wildlife trafficking investigation resources into a consolidated and specialised law enforcement entity to overcome the current challenge of fragmentation, and, secondly, complete a national work study on the consolidation of a law enforcement initiative regarding the prevention, combating and investigation of wildlife trafficking syndicates and activities, which in turn will result in the establishment of a dedicated and resourced anti-wildlife trafficking structure within the organisation.

The NISCWT, subsequently, proposes the following organisational framework (on the next page) to be utilised by the SAPS and other relevant government role players as a starting point concerning this matter.

PROPOSED ORGANISATIONAL FRAMEWORK: NATIONAL ANTI-WILDLIFE TRAFFICKING UNIT (NAWTU)

