



ILLEGAL WILDLIFE TRADE

A Trinidad and Tobago Perspective

SA 003/2023

ILLEGAL WILDLIFE TRADE – A TRINIDAD AND TOBAGO PERSPECTIVE



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ACRONYMS

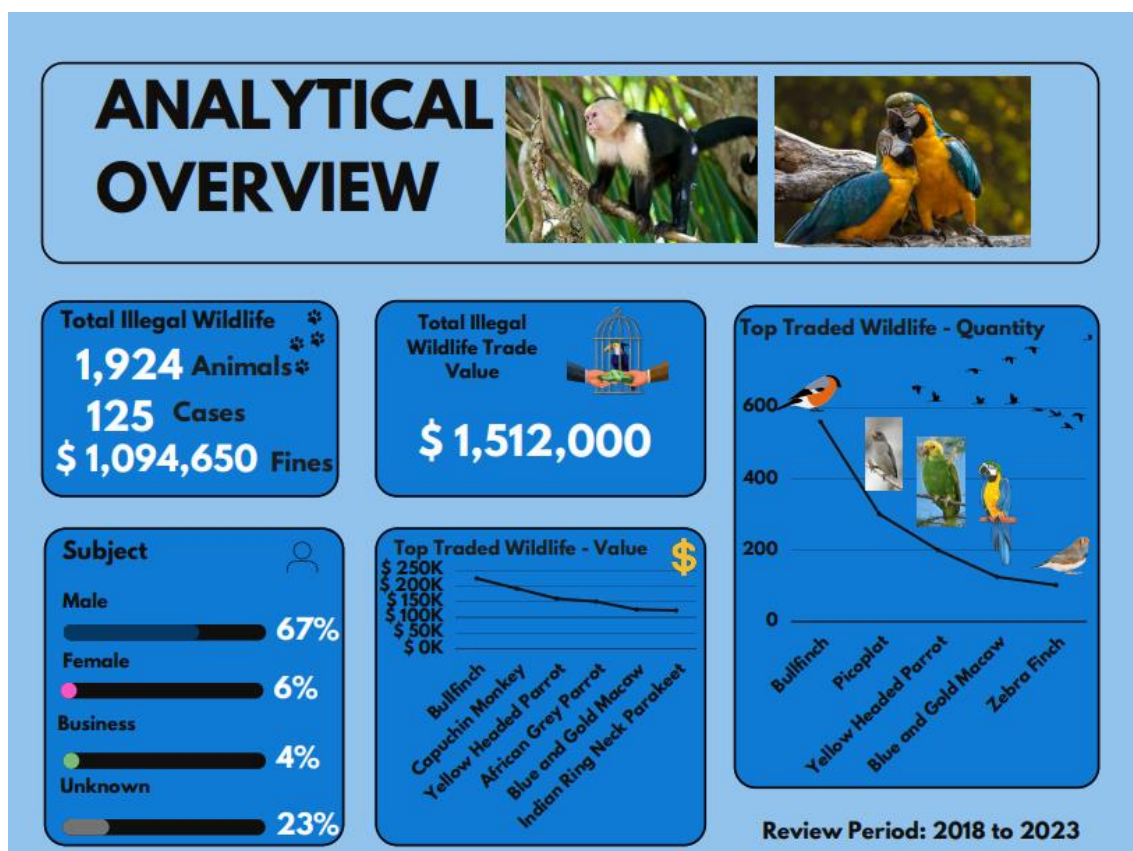
AML/CFT	Anti-Money Laundering/Counter Financing of Terrorism
CFATF	Caribbean Financial Action Task Force
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
FATF	Financial Action Task Force
FI	Financial Institution
FIU	Financial Intelligence Unit
FIUTT	Financial Intelligence Unit of Trinidad and Tobago
IWT	Illegal Wildlife Trade
LEA	Law Enforcement Authority
LB	Listed Business
MALF	Ministry of Agriculture, Land and Fisheries
ML/FT	Money laundering/Financing of Terrorism
RE	Reporting Entities
STR/SAR	Suspicious Transaction Report/Suspicious Activity Report

EXECUTIVE SUMMARY

Wildlife crimes should be considered a global problem rather than a regional or local issue. The Illegal Wildlife Trade (IWT) is a subset of wildlife crime, which encompasses actions such as smuggling, trading or trafficking of Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), designated species and/or other protected species, including their parts and products. All regions around the world are involved in illicit supply chains as either source, transit, or destination jurisdictions, or a combination thereof. As pointed out by global bodies including the Financial Action Task Force (FATF), traffickers resort to financial crime throughout the chain of IWT from poacher to consumer.

Financial Intelligence Units (FIUs) have the primary role of ‘following the money’ and analysing the illicit financial flows behind the IWT. This process can be most effective when working in partnership with the private sector. The Financial Intelligence Unit of Trinidad and Tobago (“the FIUTT”) completed this Strategic Analysis report on IWT with data requested from the Ministry of Agriculture, Land and Fisheries (MALF). **Diagram 1** gives an overview of the findings of the data analysed from a Trinidad and Tobago perspective.

Diagram 1 showing an analytical overview of IWT in Trinidad and Tobago



CHAPTER 1 - INTRODUCTION

BACKGROUND

The FIUTT in accordance with sections 8(3)(c)(ii) and 17(1)(b) of the FIUTT Act, Chap. 72:01 and FATF Recommendation 29, conducts strategic analysis using data from the Suspicious Transaction/Suspicious Activity Reports (STRs/SARs), open source information and/or Requests for Information submitted by Law Enforcement Authorities (LEAs) to identify Money Laundering/Financing of Terrorism (ML/FT) related trends and patterns. In this strategic analysis, data was collected from the MALF in order to provide insight into this prominent issue of IWT.

According to the United Nations Environment Programme (UNEP) UNEP-Interpol Rapid Response Assessment (2016)¹ the international **IWT** (excluding timber and fisheries) is estimated to be worth between USD 7 billion and USD 23 billion a year, making it the fourth largest illegal global trade after **drug trafficking** (USD 344 billion), **counterfeiting** (USD 288 billion) and **human trafficking** (USD 157 billion) and covers a broad range of endangered species.

IWT not only has the propensity to threaten the survival of numerous endangered species but also expands and strengthens criminal networks, increases global health risks and to a lesser extent threatens nature-based forms of tourism.

Given the recent prominence of IWT within the global Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) environment, the FIUTT, in keeping with FATF Recommendation 1², attempted to gain an understanding of the risk associated with IWT.

The FIUTT liaised with the MALF to acquire the requisite data as it related to IWT. This led to the FIUTT conducting this Strategic Analysis in an attempt to determine the type and quantity of wildlife trafficked, the estimated dollar value, breaches of legislation, the subsequent outcome as well as to identify the socio-economic impact and discuss measures which can be implemented to address and mitigate the risks and threats identified.

OBJECTIVES

The Strategic Analysis Report is intended to:

- Support the anti-money laundering/counter financing of terrorism regime internationally and locally to better understand and respond to the dynamic nature of the IWT;
- Identify and assess areas of risk highlighted by the IWT in Trinidad and Tobago;
- Share the FIUTT's perspectives in relation to steps which should be taken to mitigate these risks and propose solutions to remedy these threats;

¹ The rise of environmental crime: A growing threat to natural resources peace, development and security | UNEP - UN Environment Programme. Available at: <https://www.unep.org/resources/report/rise-environmental-crime-growing-threat-natural-resources-peace-development-and>

² FATF (2012-2023), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, www.fatf-gafi.org/recommendations.html

- Assist stakeholders (Reporting Entities, Ministry of Agriculture, Land and Fisheries, Competent Authorities³ and Policy makers) in strengthening their efforts to prevent, detect and disrupt illicit financial and other support to the IWT.

SCOPE

The information utilised in this Strategic Analysis is based on analysis conducted on 125 identified cases by the primary agency involved in preventing, detecting and prosecuting IWT during the period January 01, 2018 to June 30, 2023. The information was prepared and submitted by the MALF detailing subject information, type and quantity of wildlife trafficked, the estimated dollar value, breaches of legislation and the subsequent outcome.

METHODOLOGY

Data analysis formed the foundation of this Strategic Analysis report which utilised various analytical tools and techniques. The FIUTT also accessed a wide range of information sources which included non-public sources such as the databases of the FIUTT, information from local Law Enforcement Authorities and open source such as media reports.

The use of academic reports and a wide array of global wildlife trafficking and environmental crimes studies were used to help understand, develop and improve FIUTT's current perception of the IWT risks faced by Trinidad and Tobago.

REPORT STRUCTURE

- The first section of this report provides an international perspective on IWT. This section examines the definition of IWT, the types of wildlife trafficked globally and how the international community addresses this prominent issue of IWT.
- The second part of this report illustrates a Trinidad and Tobago perspective on IWT including the relevant legislation, the types of wildlife trafficked locally and how Trinidad and Tobago has been addressing this issue.
- The third part of this report assesses the outcomes of the FIUTT's analysis and discusses measures which should be implemented to address and mitigate the risks and threats identified.

³ Competent Authorities as defined by the FATF are all public authorities with designated responsibilities for combatting money laundering and/or financing of terrorism

CHAPTER 2 – AN INTERNATIONAL PERSPECTIVE

DEFINITION OF ILLEGAL WILDLIFE TRADE

Environmental crime is designated as a category of money laundering predicate offences (FATF, 2021).⁴ In broad terms, environmental crime is the category of illegal activities, which cause harm to the environment and threaten the sustainability of ecosystems. Environmental crimes encompass the subsets of wildlife crime and IWT.

According to the FATF (2020⁵) there is no internationally agreed definition of IWT. The FATF (2020) however, acknowledges that “wildlife trade” can be domestic or international and legal or illegal.

The Egmont Centre of FIU Excellence and Leadership (ECOFEL) (2021⁶) states that “*wildlife crime refers to acts which breach international and domestic regulations intended to protect natural resources. The acts may include, but are not limited to, the illegal hunting, poaching, taking, possessing, transporting, or selling of protected species of flora and fauna.*” IWT however, is a subset of wildlife crime which comprises of smuggling, trading or trafficking of CITES designated species and/or other protected species.

The UNODC (2016⁷) describes “wildlife trafficking” as the “*illegal trade, smuggling, poaching, capture, or collection of endangered species, protected wildlife (including animals or plants that are subject to harvest quotas and regulated by permits), derivatives, or products thereof*”.

Diagram 2 showing IWT as a subset of Environmental Crime



Source: ECOFEL Financial Investigations into Wildlife Crime Report (2021)

⁴ FATF (2021), Money Laundering from Environmental Crimes, FATF, Paris, France, Available at: <https://www.fatf-gafi.org/publications/methodsandtrends/documents/money-laundering-environmentalcrime.html>

⁵ FATF (2020), Money Laundering and the Illegal Wildlife Trade, FATF, Paris, France, Available at: www.fatf-gafi.org/publications/methodsandtrends/documents/money-laundering-illegal-wildlife-trade.html

⁶ ECOFEL (2021), Financial Investigations into Wildlife Crime, Available at: https://egmontgroup.org/wp-content/uploads/2021/09/2021_ECOFEL_-_Financial_Investigations_into_Wildlife_Crime.pdf

⁷ UNODC (2016), Criminalization of Wildlife Trafficking, Available at: <https://www.unodc.org/e4j/en/wildlife-crime/module-3/key-issues/criminalization-of-wildlife-trafficking.html>

INTERNATIONAL ENVIRONMENTAL LEGISLATION

The ECOFEL (2021) identified several legally binding instruments⁸, which countries subscribe to including but not limited to:

- CITES⁹
- International Tropical Timber Agreement¹⁰
- Convention on Biological Diversity¹¹
- Convention on the Conservation of Migratory Species of Wild Animals¹²
- Agreement on the Conservation of African-Eurasian Migratory Waterbirds¹³
- Agreement on the Conservation of Gorillas and Their Habitats, also known as the Gorilla Agreement¹⁴
- Convention Concerning the Protection of the World Cultural and Natural Heritage¹⁵

According to the United Nations Office on Drugs and Crime (UNODC, 2020), IWT is transcontinental and each country plays a role as a source, transit or destination of illicitly traded wildlife.¹⁶

Based on a country's risk level as it relates to IWT, they may either subscribe to one of the internationally binding agreements or form regional agreements, treaties or conventions with the necessary counterparts.

⁸ ECOFEL (2021), Financial Investigations into Wildlife Crime, Available at: https://egmontgroup.org/wp-content/uploads/2021/09/2021_ECOFEL_-_Financial_Investigations_into_Wildlife_Crime.pdf

⁹ CITES (n.d.), Convention on International Trade in Endangered Species of Wild Fauna and Flora, Available at: <https://cites.org/eng/disc/text.php>

¹⁰ European Union, (2006), International Tropical Timber Agreement, Available at: <https://eur-lex.europa.eu/EN/legal-content/summary/international-tropical-timber-agreement.html>

¹¹ United Nations, (1992), Convention On Biological Diversity, Available at: <https://www.cbd.int/doc/legal/cbd-en.pdf>

¹² Convention on the Conservation of Migratory Species of Wild Animals, (1979), Convention on the Conservation of Migratory Species of Wild Animals, Available at: <https://www.cms.int/en/legalinstrument/cms>

¹³ Convention on the Conservation of Migratory Species of Wild Animals, (1995), Agreement on the Conservation of African-Eurasian Migratory Waterbirds, Available at: <https://www.cms.int/en/legalinstrument/aewa#:~:text=The%20Agreement%20on%20the%20Conservation,Greenland%20and%20the%20Canadian%20Archipelago>

¹⁴ Convention on the Conservation of Migratory Species of Wild Animals, (2008), Gorilla agreement, Available at: <https://www.cms.int/en/legalinstrument/gorilla-agreement#:~:text=The%20Gorilla%20Agreement%20provides%20governments,gorilla%20populations%20and%20their%20habitats>

¹⁵ UNESCO, (1972), Convention Concerning The Protection Of The World Cultural And Natural Heritage, Available at: <https://whc.unesco.org/archive/convention-en.pdf>

¹⁶ UNODC, (2020), World Wildlife Crime Report – Trafficking in protected species, Available at: https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf

THE TYPES OF WILDLIFE TRAFFICKED GLOBALLY

AMERICAS	WEST & CENTRAL AFRICA	EAST & SOUTHERN AFRICA	EUROPE	ASIA-PACIFIC
Sea turtles	Elephant	Elephant	Birds of Prey	Tigers
Iguanas	Pangolin	Turtles/tortoises	Whale	Turtles
Parrots	Rosewood	Rhino	Bears	Pangolins
Totoaba	Crocodiles	Big Cats	European eels	Orangutans
Corals	Panther	Shark	Songbirds	Parrots

Source: ECOFEL Financial Investigations into Wildlife Crime Report (2021)

HOW THE INTERNATIONAL COMMUNITY ADDRESSES IWT

ECOFEL (2021), identified a series of formal co-operation mechanisms on how the international community can address IWT¹⁷. These include:

- Memorandum of Understanding (MoUs) outlining an agreement between agencies to cooperate on a specific issue.
- Governmental committees concerned with AML/CFT matters may consider wildlife crime in their agendas.
- Several informal mechanisms may be used to improve the exchange of information between FIUs and other government agencies.
- Environmental agencies have not been traditional partners for FIUs. However, they are crucial partners in the fight against wildlife crime and the identification of the related illicit financial flows.
- Environmental agencies have technical knowledge regarding the key species, industries, and concealment methods of the illegal wildlife trade in their respective jurisdictions. This knowledge is useful for developing analytical tools and suspicious transaction reports (STRs) filtering mechanisms for FIUs. Additionally, environmental agencies are often the national focal point for international cooperation regarding CITES and wildlife trade.

¹⁷ ECOFEL (2021), Financial Investigations into Wildlife Crime, Available at: https://egmontgroup.org/wp-content/uploads/2021/09/2021_ECOFEL_-_Financial_Investigations_into_Wildlife_Crime.pdf

CHAPTER 3 – A TRINIDAD AND TOBAGO PERSPECTIVE

ILLEGAL WILDLIFE TRADE – DEFINITION

Trinidad and Tobago is a party to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and has designated both the Forestry Division (Trinidad) and the Division of Food Security, Natural Resources, the Environment and Sustainable Development of the Tobago House of Assembly (THA) as National Management Authorities that administer the CITES permit system, with the Wildlife Biologist and/or the Head of Wildlife Section functioning as the national CITES Scientific Authority. Notably, however, Trinidad and Tobago has not enacted enabling legislation for national enforcement of CITES. Thus, while CITES permits have been implemented as an administrative requirement for the export of wildlife, this administrative arrangement is not supported by enabling legislation (*Government of Trinidad and Tobago National Wildlife Policy, 2013¹⁸*).

LEGISLATION – TRINIDAD AND TOBAGO

- Conservation of Wild Life Act, Chap. 67:01
 - Sections 7 and 8 of the Forests Act, Chap 66:01
 - Animal (Diseases and Importation) Act, Chap 67:02
 - Environmental Management Act of 2000
 - Finance Act No. 19 of 2018
 - Proceeds of Crime Act (POCA), Chap. 11:27
- Second Schedule, Environmental Crimes

Under the Conservation of Wildlife Act, Chapter 67:01, possession of a protected animal is punishable by law.

Conservation of Wildlife Act, Ch. 67:01 major fines are:

- Hunting in the closed season: TT\$10,000.00
- Hunting a protected animal: TT\$10,000.00
- Possession of a second schedule animal during the closed season: TT\$10,000.00
- Possession of a protected animal: TT\$10,000.00
- Hunting in a Game Sanctuary: TT\$10,000.00

Environmental Management Act major fine is:

- Hunting an Environmentally Sensitive Species: TT\$100,000.00 and 2 years' imprisonment.

¹⁸ Government of Trinidad and Tobago, (2013), National Wildlife Policy, Available at: https://www.biodiversity.gov.tt/home/images/stories/pdf/final_nwp.pdf

LEGALLY BINDING INSTRUMENTS




Trinidad and Tobago, as a country committed to addressing environmental and wildlife conservation issues, is signatory to several legally binding international instruments and organizations (Mahabir, 2019)¹⁹. Some of these agreements and organizations include:

- **Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES):** Trinidad and Tobago is a signatory to CITES, which regulates the international trade of endangered species to ensure their protection.
- **Convention on Biological Diversity (CBD):** This international treaty aims to promote the conservation and sustainable use of biological diversity.
- **Ramsar Convention on Wetlands:** Trinidad and Tobago has designated several wetlands as Ramsar Sites under this convention, recognizing their importance for biodiversity and ecosystem services.
- **Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal:** This treaty controls the transboundary movement of hazardous waste and their disposal.
- **Montreal Protocol on Substances that Deplete the Ozone Layer:** This international agreement aims to protect the ozone layer by phasing out the production and use of ozone-depleting substances.
- **Caribbean Environment Programme (CEP):** Trinidad and Tobago participates in the CEP, which is part of the United Nations Environment Programme (UNEP). It focuses on addressing environmental issues in the wider Caribbean region.
- **Inter-American Convention for the Protection and Conservation of Sea Turtles:** This regional agreement is aimed at protecting and conserving sea turtles in the Western Atlantic and Caribbean.

¹⁹ D,Mahabir. (2019). *An Analysis of CITES Implementation in Trinidad and Tobago*.

TYPE OF WILDLIFE TRAFFICKED

According to the Nurture Nature Campaign (2022)²⁰, as of January 2022, over 191 species of wild birds, invertebrates, mammals and reptiles have been identified as harmfully traded as pet wildlife in Trinidad and Tobago since January 2016. Animals frequently trafficked into Trinidad are Parrots, Macaws, Monkeys, Iguanas, Otters, Sloths, Tapirs and a pair of Jaguars (Nurture Nature Campaign, 2022)²¹. Additionally, the founder of the El Socorro Centre for Wildlife Conservation said in a release that non-native species of monkeys were one of the most widely traded animals, entering the country via Venezuela or Guyana.²²

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Blue and Gold Macaw</p> <p><i>Ara ararauna</i> was previously hunted to local extinction and was reintroduced after the careful work of conservationists. It is a locally protected species and international trade is strictly regulated.</p>
	<p>Red and Green Macaw</p> <p><i>Ara chloropterus</i>, a non-native species, has been introduced to Trinidadian forests through the pet trade. It is a locally and internationally protected species and its keeping is officially subject to strict controls.</p>
	<p>Orange-winged Amazon</p> <p><i>Amazona amazonica</i> is a native species traditionally kept in Trinidadian and Tobagonian homes. International trade and pet keeping are subject to strict control, but local protections are limited.</p>

²⁰ Nurture Nature, (2022), T&T Pet Wildlife Trade, Available at: <https://www.nurturenaturett.org/the-species>

²¹ Nurture Nature is a coalition-based campaign to improve animal welfare and wildlife conservation in one of the most biodiverse countries in the Caribbean. The Nurture Nature Campaign is supported by a coalition of thirteen local and regional NGOs on issues related to animal welfare, biodiversity conservation, and public health management.


²² Trinidad and Tobago Manufacturers Association, (2020), Illegal wildlife trade serious threat to ecosystem, Available at: <https://www.ttma.com/communications/daily-brief/daily-brief-wednesday-14th-october-2020>

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Yellow-crowned Amazon</p> <p><i>Amazona ochrocephala</i> is a native, or possibly introduced, species popular in the pet trade for its relative skill at mimicry. It is protected locally and internationally and its keeping is officially subject to strict regulation.</p>
	<p>Yellow-shouldered Amazon</p> <p><i>Amazona barbadensis</i> is a non-native species that is listed as “vulnerable” to extinction by the International Union for Conservation of Nature’s (IUCN) Red List of Threatened Species. It is a locally protected species and international trade is banned barring exceptional circumstances.</p>
	<p>Scarlet Macaw</p> <p><i>Ara macao</i> is possibly a native species that was made extinct in Trinidad in the 20th century. It is protected locally. Internationally, trade is mainly forbidden outside of exceptional circumstances.</p>
	<p>Bullfinch</p> <p><i>Sporophila angolensis</i> is a native species that is almost extinct locally and so is trafficked heavily from the mainland. It is a locally protected species, however, the regulations concerning its trade and keeping are inconsistent.</p>

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Channel-billed Toucan</p> <p><i>Ramphastos vitellinus</i> is a native species that is listed as “vulnerable” to extinction by the IUCN. It is a locally and internationally protected species and its trade is strictly regulated.</p>
	<p>Picoplat</p> <p><i>Sporophila intermedia</i> is a native species that is almost extinct locally and so is trafficked in from the mainland. It is a locally protected species and its keeping is officially subject to strict controls.</p>
	<p>Guianan Squirrel Monkey</p> <p><i>Saimiri sciureus</i> is a non-native species that is occasionally trafficked from the mainland. It is a locally and internationally protected species and its trade is officially subject to strict regulation.</p>
	<p>Red Howler Monkey</p> <p><i>Alouatta macconnelli</i> is a native species sometimes hunted for its meat and offspring. Locally, it has substantial protections as an Environmentally Sensitive Species (ESS). Trade and keeping are locally banned and international trade is strongly regulated.</p>

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Wedge-capped Capuchin</p> <p><i>Cebus olivaceus</i> is a non-native species that is a common sight as an escaped or abandoned animal. It is a locally and internationally protected species and its keeping is officially subject to strict controls.</p>
	<p>Lowland Tapir</p> <p><i>Tapirus terrestris</i> is a non-native species that is listed as “vulnerable” to extinction by the IUCN. It is a locally and internationally protected species and its trade is officially subject to strict regulation.</p>
	<p>Red Brocket Deer</p> <p><i>Mazama americana</i> is a native species in Trinidad that was once also found in Tobago. It is now a game species that is declining in numbers. Trade in living deer is officially subject to local controls.</p>
	<p>Ocelot</p> <p><i>Leopardus pardalis</i> is a native species, but it is more commonly trafficked in from the mainland. The Trinidadian sub-species is notable for having a black nose, whilst the mainland sub-species has a pink or mottled nose. It is both a locally and internationally protected species.</p>

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Crab-eating Raccoon</p> <p><i>Procyon cancrivorus</i> is a native species occasionally targeted both as wild meat and pet wildlife. It is a locally protected species and wildlife management experts fear local populations are experiencing over-hunting.</p>
	<p>Giant River Otter</p> <p><i>Pteronura brasiliensis</i> is a non-native species that is listed as “endangered” by the IUCN. It is a locally and internationally protected species. Due to its sensitive conservation status international trade is almost completely forbidden.</p>
	<p>Jaguar</p> <p><i>Panthera onca</i> is a non-native species listed as “near threatened” by the IUCN and is now particularly threatened by East Asian consumers. It is protected locally and internationally and its trade is officially subject to stringent controls.</p>
	<p>Red-eared Slider</p> <p><i>Trachemys scripta elegans</i> is a non-native species commonly found in pet shops and recently in Trinidadian waterways. It is considered to be one of the most invasive species in the world but is unregulated locally.</p>

TYPE OF ANIMAL TRAFFICKED	DESCRIPTION
	<p>Yellow-footed Tortoise</p> <p><i>Chelonoidis denticulata</i> is a native species that is listed as “vulnerable” to extinction by the IUCN. It is a locally and internationally protected species and its trade is officially subject to strict controls</p>

Source: Nurture Nature (2022)²³

A T&T PERSPECTIVE OF IWT

• According to **The Hunter’s Association of Trinidad and Tobago**, the majority of people involved in poaching are not actual hunters. Poaching is but a single piece to a larger puzzle that constitutes the criminal underworld and “*the illegal animal trade is tied closely to the illegal gun, ammunition and narcotics trade, prostitution, human trafficking; everything that takes place cross borders between Trinidad and Venezuela*”.²⁴

The Hunter’s Association of Trinidad and Tobago also noted that areas such as Cedros, Fullerton and Icacos are prevalent with poachers. Drug lords and affluent, powerful members of society place orders for these exotic animals. “*Some of them just like having a luxury animal. Price is not an issue. Once you have money, you can get anything you want*”.

• According to the **Trinidad and Tobago Police Academy (2020)**²⁵, the demand for wildlife in Trinidad and Tobago has encouraged a thriving trade between Trinidad and Venezuela. For years, the illegal trade has existed between the two countries, mainly for the market in Trinidad, but with the economic crisis in Venezuela more of its citizens are lured into the profitable illegal trade as a means of survival. Trinidad and Tobago, the southernmost islands in the Caribbean archipelago, lie approximately seven miles east off the nearest coast of Venezuela.

• It was reported that in June 2020, law enforcement officials intercepted a number of Venezuelan and Trinidadian nationals either in pirogues on the sea or on land with contraband items. In August 2020, smugglers were caught by Coast Guard officers on the sea attempting to smuggle in a large quantity of birds, otters and other wild animals.

• Interviews with law enforcement officers also highlighted the concern that the same routes taken by wildlife traffickers are the same used for human smuggling as well as for the trafficking of illegal guns and ammunitions, illegal

²³ Nurture Nature, (2022), T&T Pet Wildlife Trade, Available at: <https://www.nurturenaturett.org/the-species>

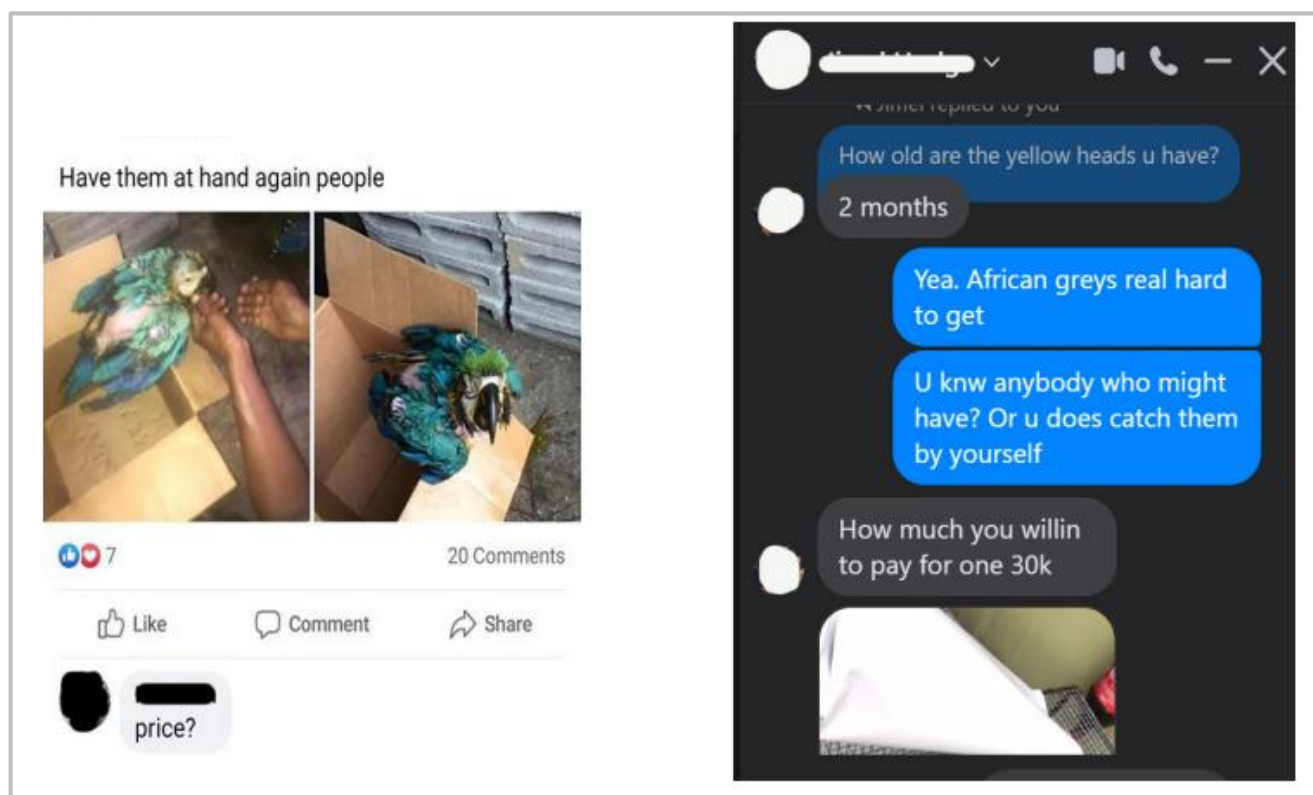
²⁴ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

²⁵ Trinidad and Tobago Police Academy, (2020), Wildlife Trafficking in Trinidad And Tobago, Available at: [Wildlife Trafficking in Trinidad And Tobago - Border Security Report \(border-security-report.com\)](#)

drugs, and human trafficking. Research has shown that law enforcement officers have expressed concerns about the involvement of organised criminal groups in the trade and the subsequent money laundering from the huge profits made²⁶.

- Reports indicate that when additional cargo space is available, animals are smuggled with contraband shipments as a way for traffickers to earn extra money. Animals that are more difficult to obtain such as jaguars, ocelots and African Greys fetch higher prices. More common animals such as the Orange Winged Amazon and Yellow Crowned Amazon parrots, Macaws or Tufted Capuchin Monkeys are sometimes traded with mainland residents for items such as toilet paper or flour²⁷.
- Many traffickers are not caught and the trade flourishes. Searches on social media platforms show advertisements from numerous persons selling sometimes protected birds and other animals at cheap prices²⁸. Diagram 3 shows one example of the cost of illegal wildlife advertised for sale in Trinidad and Tobago.

Diagram 3 shows cost of illegal wildlife advertised for sale in Trinidad and Tobago



²⁶ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

²⁷ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

²⁸ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

- The Bullfinch locally referred to as a ‘Chikichong’ is a prized possession in competitive bird singing competitions. Locally, birds cost thousands but those trafficked from Venezuela cost around TTD 300 (USD 45) per bird on the black market. However, if the bird has started to sing, prices start at TTD 500 plus (USD 75 plus) per bird.²⁹
- Chairman of The Wildlife and Environmental Protection of Trinidad and Tobago in expressing his concern on IWT stated *“But who is to blame? The poachers? Yes, they do carry a part of the burden, but they are not the main part of the problem. Where there is demand, there will be a supply. Our fellow citizens are the problem. By creating the demand for these animals, poachers have a market and a reason to continue destroying the lives of many innocent animals”*.³⁰

HOW TRINIDAD AND TOBAGO ADDRESSES IWT

- In July 2020, the Conservator of Forests stated, *“We have done numerous training programs and sensitization programs with Police, Customs, Coast Guards and other state agencies. At the end of last year, we were able to produce two handbooks to be used by various state agencies guiding them on how to proceed whenever they detect a wildlife offence. This was done in collaboration with the Food and Agriculture Organisation (FAO), Environmental Management Authority (EMA) and Forestry Division. Through patrols conducted by Forestry Officers as well as reports and information received from the public and networking agencies, officers are able to detect and investigate persons in possession of protected animals.”*³¹
- In January 2023, three hundred and ninety-six (396) Honorary Game Wardens³² were officially appointed via Gazette as outlined in the Conservation of Wildlife Act.³³
- In February 2023, the Forestry Division (Wildlife Section) of the MALF initiated a three (3) training programme for Honorary Game Wardens; sixty-eight (68) of whom received their letters of appointment from the Minister of MALF³⁴.
- As of February 2023, there were currently forty-six (46) Game Wardens employed with MALF and the Minister (of MALF) said these appointments would strengthen the unit’s capabilities. The last batch of Honorary Game Wardens were appointed in 2016 with some 130 citizens receiving their letters of appointment for one year.³⁵

²⁹ Trinidad and Tobago Police Academy, (2020), Wildlife Trafficking in Trinidad And Tobago, Available at: [Wildlife Trafficking in Trinidad And Tobago - Border Security Report \(border-security-report.com\)](https://border-security-report.com)

³⁰ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

³¹ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)

³² Honorary Game Wardens are volunteers who are conferred with the same powers as Game Wardens; empowered under the Conservation of Wildlife Act and related legislation.

³³ MALF, (2023), Illegal Wildlife Trade Linked To Greater Criminal Enterprise, Available at: [Illegal wildlife trade linked to greater criminal enterprise | Ministry of Agriculture, Land and Fisheries](#)

³⁴ MALF, (2023), Illegal Wildlife Trade Linked To Greater Criminal Enterprise, Available at: [Illegal wildlife trade linked to greater criminal enterprise | Ministry of Agriculture, Land and Fisheries](#)

³⁵ MALF, (2023), Illegal Wildlife Trade Linked To Greater Criminal Enterprise, Available at: [Illegal wildlife trade linked to greater criminal enterprise | Ministry of Agriculture, Land and Fisheries](#)

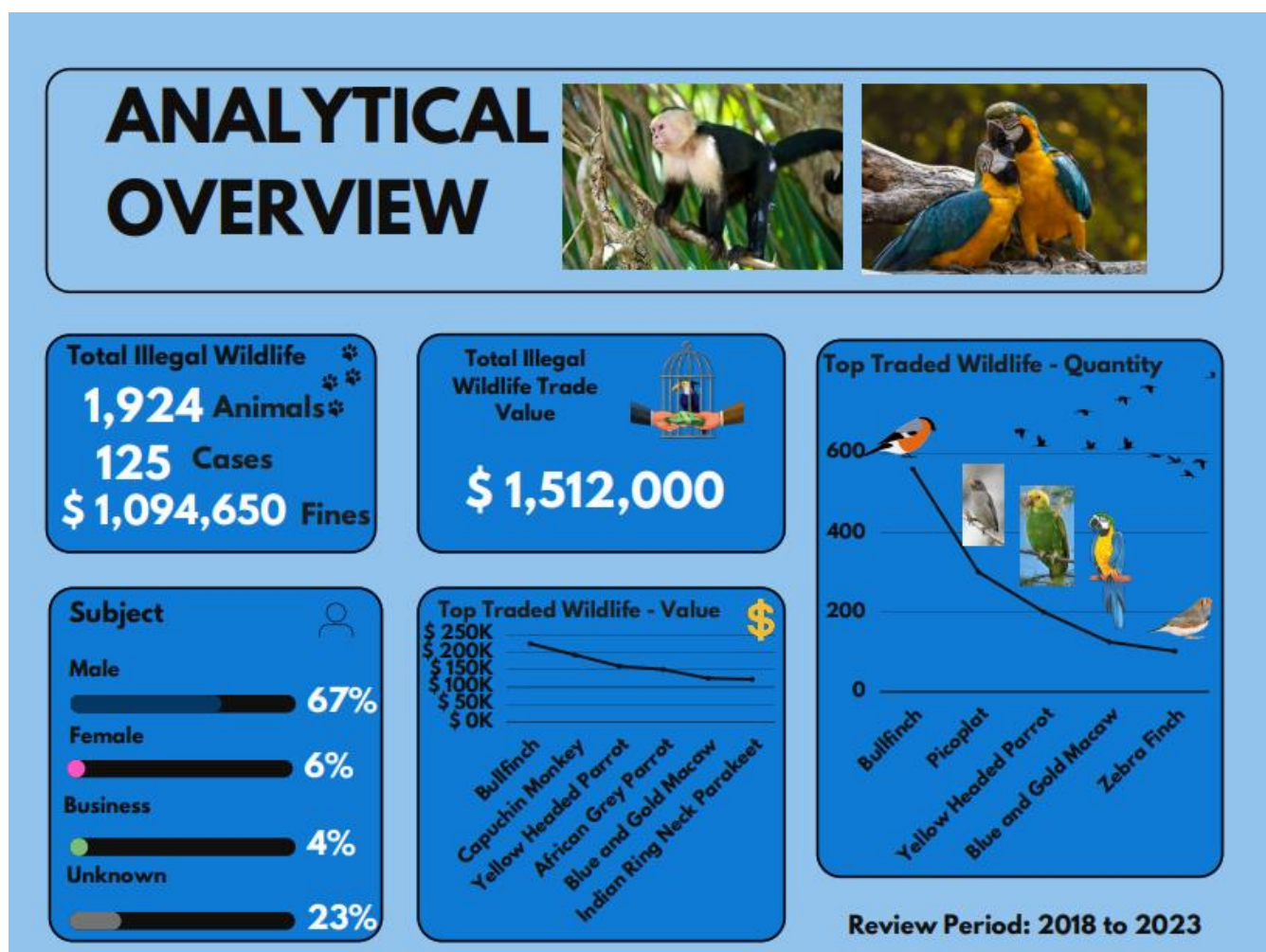
CHAPTER 4 – KEY FINDINGS

ANALYTICAL OVERVIEW

For the period January 2018 to July 2023, the FIUTT's analytical overview details key areas identified during the analysis such as:

- Total Illegal Wildlife Animals/Cases/Fines
- Subject Profile
- Total IWT value
- Top 10 Traded Wildlife – value
- Top 10 Traded Wildlife – quantity

Diagram 4 showing the analytical overview of the dataset

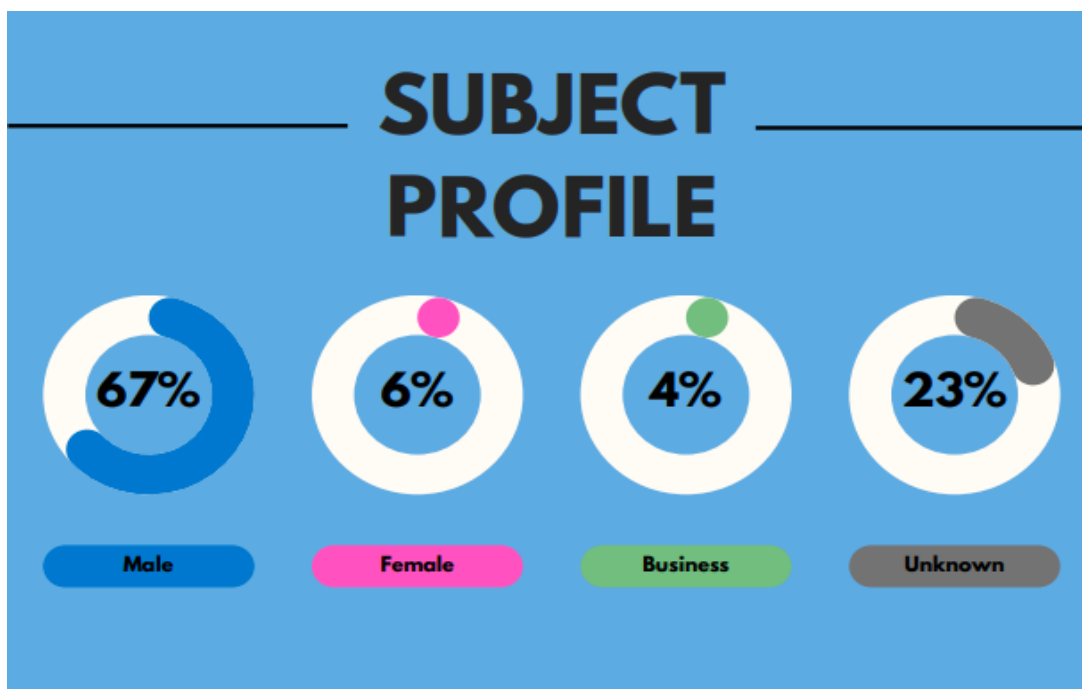


SUBJECT PROFILE

Analysis of the data received from the MALF revealed that the Subjects held relative to IWT comprised of sixty-seven percent (67%) Males, six percent (6%) Females, four percent (4%) Business and twenty-three percent (23%) unknown³⁶.

Diagram 5 illustrates the composition of the Subject profiles for the period January 2018 – July 2023.

Diagram 5 showing the composition of the Subject profiles



ILLEGAL WILD LIFE

Based on the data, a total of **1,924** wildlife were found within Trinidad and Tobago in contradiction to the relevant legislation as it pertains to the possession of these wildlife. Analysis revealed that the most smuggled wildlife is the **Bullfinch (560)** followed by the **Picoplat (301)** and **Yellow Headed Parrot (200)** respectively.

Diagram 6 shows the number and the types of wildlife smuggled in Trinidad and Tobago.

³⁶ Unknown: no information was recorded to identify whether the suspect was male, female or a business entity.

Diagram 6 showing the number and types of wildlife smuggled in T&T

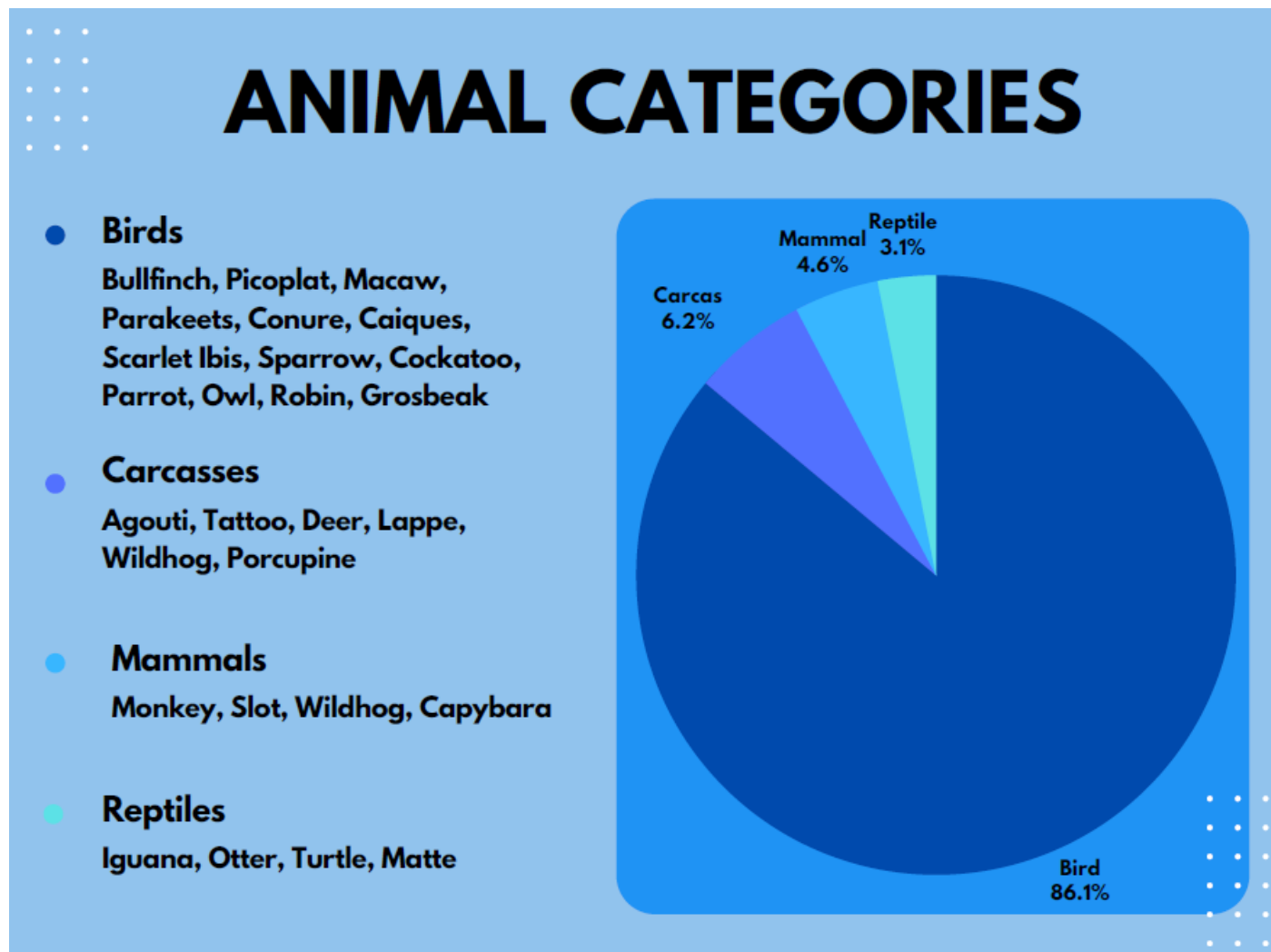


ANIMAL CATEGORIES

Of the **1,924** wildlife found within Trinidad and Tobago, analysis revealed four (4) main animal categories including:

- Birds which accounted for 86.1% or 1,656
- Carcasses which accounted for 6.2% or 120
- Mammals which accounted for 4.6% or 88
- Reptiles which accounted for 3.1% or 60

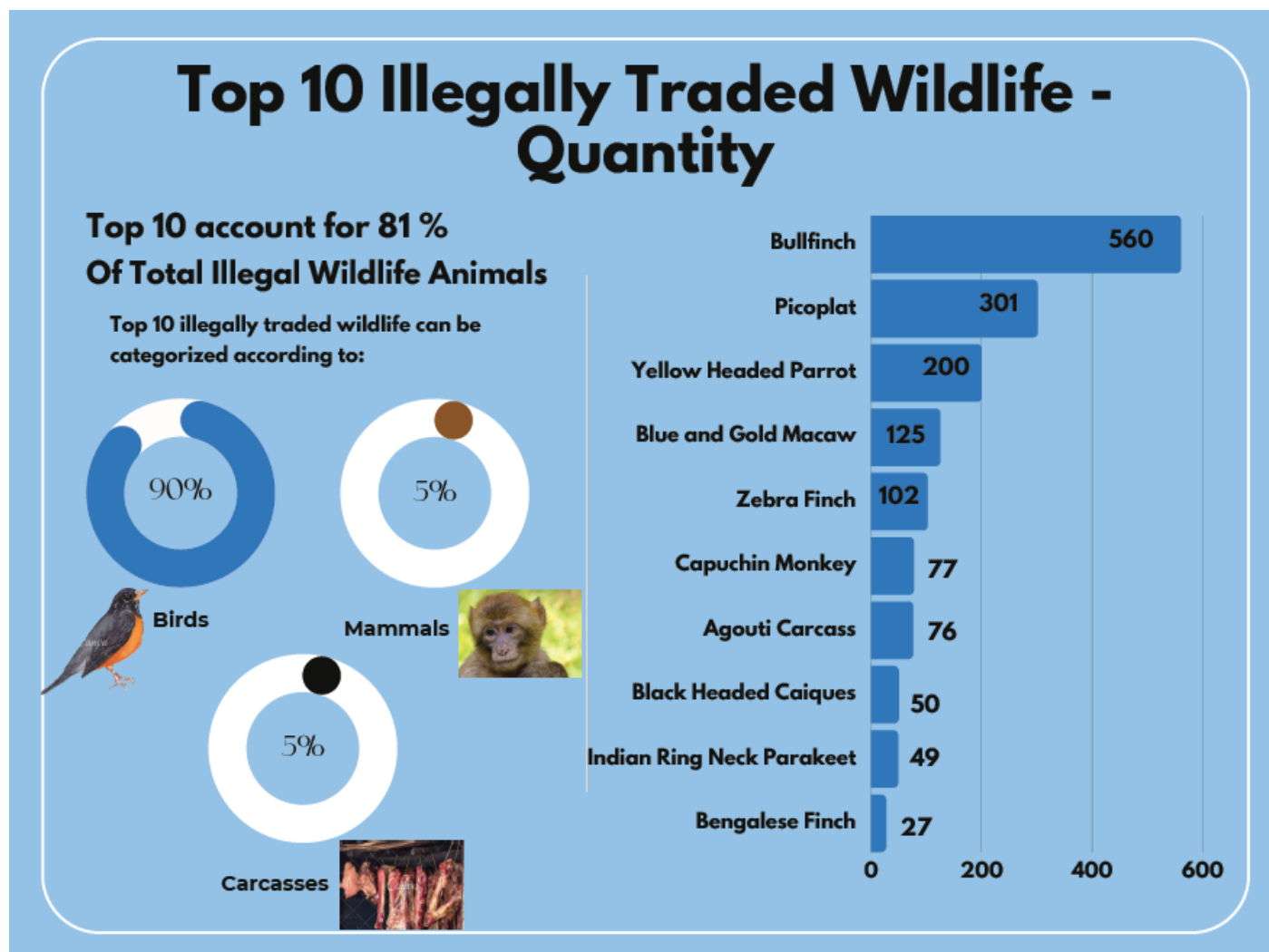
Diagram 7 showing the animal categories found within T&T



TOP 10 ILLEGALLY TRADED WILDLIFE – QUANTITY

For the period January 2018 to July 2023, the top ten (10) illegally traded wildlife accounted for **81% or 1,567** of the total number of wildlife smuggled. **Birds** accounted for **90% or 1,414** of the top ten illegally traded wildlife followed by **Mammals (5% or 77)** and **Carcasses (5% or 76)**. Diagram 8 shows the top 10 illegally traded wildlife by quantity.

Diagram 8 showing the top 10 illegally traded wildlife by quantity



TOP 10 ILLEGALLY TRADED WILDLIFE – VALUE

For the period January **2018 to July 2023**, the top ten (10) illegally traded wildlife accounted for **75%** or **TTD 1,132,150.00** of the total value of wildlife smuggled. **Birds** accounted for **80%** or **TTD 901,650.00** of the top ten illegally traded wildlife followed by **Mammals** (**17%** or **TTD 192,500.00**) and **Carcasses** (**3%** or **TTD 38,000.00**). **Diagram 9** shows the top 10 illegally traded wildlife by value.

Diagram 9 showing the top 10 illegally traded wildlife by value



SUBJECT LOCATION

Of the **125 cases** received from MALF, the subjects spanned across Trinidad with **44 or 35%** of the subjects originating from the **South Western area**. This was followed by **San Fernando and environs**, **Central** and **Eastern** accounting for **13 or 10%**, **11 or 9%** and **10 or 8%** of the Subjects respectively. **Diagram 10** shows the areas in which the Subjects originated from. It should be noted that no location was identified and/or recorded for **31 or 25%** of the Subjects.

Diagram 10 showing the areas in which the Subjects originated from



LEGISLATIVE BREACHES & OUTCOMES

The following tables identifies the legislative breaches and the respective outcomes for 120 cases.

Diagram 11 showing the legislative breaches and respective outcomes

Legislative Breaches & Outcomes					
Legislation	Fined	Cautioned	Arrested / Charged	Ongoing / Pending	Total
Keeping Protected Animals in captivity without a Permit	11	28	5	6	50
Possession of Second Schedule Animals without a Permit	34	0	5	6	45
Possession of Second Schedule Animal during the Closed Season	4	0	1	0	5
Clipped Wings of Protected Bird	4	1	0	0	5
Late Return of Mandatory Data Form(s)	4	0	0	0	4

Legislative Breaches & Outcomes					
Legislation	Fined	Cautioned	Arrested / Charged	Ongoing / Pending	Total
Animals Exposed for Sale in the Closed Season	0	2	0	0	2
Keeping Second Schedule Birds in Undersized Cages	2	0	0	0	2
Expose for Sale Second Schedule Birds	1	0	0	0	1
Possession of Iguana Carcasses	1	0	0	0	1
Contrary to regulation 18 of the Animal (Diseases and Importation) Act Chap 67:02	1	0	0	0	1

Legislative Breaches & Outcomes

Legislation	Fined	Cautioned	Arrested / Charged	Ongoing / Pending	Total
Entering a Prohibited Area without a Permit	1	0	0	0	1
Possession of a Carcass of an Environmentally Sensitive Species	0	0	1	0	1
Possession of Environmentally Sensitive Species	1	0	0	1	2
Total	64	31	12	13	120

CHAPTER 5 – DISCUSSION

According to the US Department of State Integrated Country Strategy 2022³⁷, Trinidad and Tobago is an ideal transshipment point for cocaine, narcotics and other illicit products bound for the North America, the Caribbean, Europe and Africa. The Global Organized Crime Index 2023³⁸ further adds that the existence of well-established cargo routes (both legal and illegal) coupled with porous borders, facilitates trade with either illicit products being concealed with legitimate cargo or illicit products being smuggled, from where they are transferred to smaller local vessels at sea or delivered to specific drop-off locations in the region. Given the proximity of mainland South America to Trinidad, it is highly likely that the same routes taken by wildlife traffickers are the same used for human smuggling as well as for the trafficking of guns, ammunition and drugs. This coincides with the fact that this Strategic Analysis report identified South Western Trinidad as the area in which the majority of subjects allegedly engaged in IWT were located.

ILLEGAL WILDLIFE

Of the **1,924** wildlife identified in this Strategic Analysis report, a total of **twenty-seven (27)** different species were identified. **48% or 13** species related to **Birds**, **22% or 6** species related to **Carcasses** and **15% or 4** species each related to **Mammals** and **Reptiles** respectively. This can be further broken down into a total of **1,656 Birds**, **120 Carcasses**, **88 Mammals** and **60 Reptiles**. The findings of this Strategic Analysis report identified that of the total number of Birds identified, **61 % or 1,014** finches were smuggled which coincides with that of the Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) 2021³⁹, in stating that the most commonly trafficked animals were birds, primarily finches. This is likely due to the small sizes of the birds, particularly the finches which can be easily concealed with or within other types of cargo. In some instances, it was identified that between **20 to 162** finches were smuggled in a single shipment. In another instance it was found that a total of **27** different types of birds totalling approximately **203** birds with an estimated value of **TTD 434,500.00** were smuggled to Trinidad in a single shipment.

Noteworthy, some bird types have a significant dollar value for example, the **African Grey Parrot (TTD 25,000.00)**, the **Umbrella Cockatoo (TTD 15,000.00)** and the **Gala Cockatoo (TTD 10,000.00)**. Given the endangered status of the aforementioned birds it is expected that such wildlife would fetch a significant price on the black market. Other bird types identified such as the Bullfinch and Picoplat which do not carry a high dollar value is highly sought due to high demand for them due to their singing capabilities. The findings of the Strategic Analysis report highlighted the bullfinch and Picoplat to be the most smuggled bird which supports the findings of the Trinidad and Tobago Police Academy (2020) who also stated that the Bullfinch is a prized possession in competitive bird singing competitions and locally birds cost thousands but those trafficked from Venezuela cost around TTD 300 (USD 45) per bird on the black market. However, if the bird sings, prices start at TTD 500 plus (USD 75 plus) per bird.

Other wildlife such as the Green Wing Macaw, Scarlet Macaw, Jendaya Conure, Indian Ring Neck Parakeet, Alexandrine Parakeet, Otter, Slot, Yellow Footed Tortoise and Capuchin Monkey also have a significant demand despite having a

³⁷ US Department of State, (2022), Integrated Country Strategy – Trinidad and Tobago, Available at: [Integrated Country Strategy \(ICS\) - Trinidad and Tobago \(state.gov\)](https://www.state.gov/international-issues/terrorism/2022/04/integrated-country-strategy-trinidad-and-tobago/)

³⁸ Global Organised Crime Index, (2023), Trinidad and Tobago, Available at: https://ocindex.net/country/trinidad_and_tobago **29**

³⁹ ROUTES, (2021), Taking Off Wildlife Trafficking In The Latin America And Caribbean Region, Available at: https://www.traffic.org/site/assets/files/14510/routes_taking_off_report.pdf

high dollar value. It is likely that these types of birds are demanded due to their exotic status. This is in line with the **Hunter's Association of Trinidad and Tobago** who stated that members of society place orders for these exotic animals as some of them like having a luxury animal and price is not an issue.



It is important to note that given the conditions in which these animals are transported from the source country (suspected mainland South America) to Trinidad, often times many die in transit, where they are forced into makeshift hiding places, are poorly fed, or otherwise improperly handled. If they do survive, they often end up in cramped spaces, far from their natural habitats and other members of their species. The Strategic Analysis report considers that the number and value of wildlife smuggled may be higher than reported given (i) the quantity of wildlife that die during transit (ii) are dumped upon interception by the relevant LEAs and (iii) the quantity of wildlife that are not detected and successfully trafficked into Trinidad and Tobago See actual photos below of deceased illegally trafficked wildlife.





SUBJECT PROFILE

Analysis of the Subjects profile revealed that **73%** of the identified Subjects were either **Male (67%)** or **Female (6%)** with **4%** being classified as a **Business**. Analysis suggests that the majority of persons or businesses found to be in possession of wildlife in contravention of the relevant legislations can either be categorized as being in possession of the wildlife for either personal enjoyment or for profit. However, the absence of relevant information such as age and nationality, occupation and location for the Subjects makes it increasingly difficult to establish a Subject profile, which can be used by LEAs, Financial Institutions and Listed Businesses in identifying and disrupting persons suspected to be involved in the IWT and the subsequent laundering of illicit proceeds.

Having sufficient data to properly accurately identify and access the actors of IWT, the FIUTT can fulfill its mandate by supporting LEAs investigations through:

- Following the money associated with seized and confiscated wildlife;
- Identifying key persons, organised criminal groups or legitimate businesses that are suspected to be involved in wildlife crimes;
- Identifying potential payment methods and money laundering techniques;
- Creating typologies and advisories to enable Reporting Entities to prevent, detect and disrupt wildlife trafficking via the reporting of STRs/SARs and other financial intelligence.

THREATS POSED BY WILDLIFE TRAFFICKING

- Transmission of zoonotic diseases.

Zoonotic diseases are caused by a wide range of pathogens. Based on etiology, zoonoses are classified into **bacterial zoonoses** (such as anthrax, salmonellosis, tuberculosis, Lyme disease, brucellosis, and plague), **viral zoonoses** (such as rabies, acquired immune deficiency syndrome- AIDS, Ebola, yellow fever and avian influenza), **parasitic zoonoses** (such as trichinosis, toxoplasmosis, trematodosis, giardiasis, malaria, and echinococcosis), **fungal zoonoses** (such as ring worm), rickettsial zoonoses (Q-fever), chlamydial zoonoses (psittacosis), mycoplasma zoonoses (*Mycoplasma pneumoniae* infection), protozoal zoonoses, and diseases caused by **acellular non-viral pathogenic agents** (such as transmissible spongiform encephalopathies and mad cow disease).⁴⁰

As small-island ecosystems, Trinidad and Tobago is particularly susceptible to the negative impacts of zoonotic diseases. Based on the analysis of data received from MALF, birds, mammals and reptiles are a big part of the illegal wildlife trade. According to Rahman et al (2020), wild animals such as mammals, reptiles, birds, fish, and amphibians act as a reservoir of zoonotic pathogens with the potential of transmission to humans or other animal hosts. The involvement of wild animals in the epidemiology and transmission of zoonotic diseases is alarming. A list of the major zoonotic diseases, their etiological agents, hosts, and the major symptoms in humans can be found in the link provided.⁴¹

Rahman et al (2020) found that birds like canaries, finches, sparrows, parrots, parakeets, budgerigars are potential transmitters of zoonotic diseases.⁴² Transmission of pathogens from these animals can occur through direct or indirect contact. The transmission can take place during the smuggling process, during the subsequent sale or purchase of illegal wildlife, at home, pet shops or other places. Usually, animal bites or scratches are routes through which humans get the infection. Given that Birds (**86.1%**) comprised of the majority of smuggled wildlife it significantly increases the likelihood of zoonotic diseases spreading in Trinidad and Tobago.



⁴⁰ Rahman MT, Sobur MA, Islam MS, Levy S, Hossain MJ, El Zowalaty ME, Rahman AT, Ashour HM. Zoonotic Diseases: Etiology, Impact, and Control. *Microorganisms*. 2020 Sep 12;8(9):1405. doi: 10.3390/microorganisms8091405. PMID: 32932606; PMCID: PMC7563794.

⁴¹ Major Zoonotic Diseases, their etiological agents, hosts, and the major symptoms in humans. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7563794/table/microorganisms-08-01405-t001/?report=objectonly>

⁴² This includes but is not limited to: *Coxiella burnetii*, *Coxiella psittaci*, *Salmonella* spp., *Listeria monocytogenes*, *Erysipelothrix rhusiopathiae*, *Mycobacterium* spp., Lyme disease, and transmitters of different viruses like fowl pox virus and Newcastle disease virus. Many of these pathogens are potentially enough to cause serious diseases in human such as salmonellosis, chlamydiosis, and avian influenza A H5N1. In addition, there are wide varieties of other bacterial zoonoses in game and ornamental birds including *Pasteurella* spp., *Klebsiella* spp., *Yersinia* spp., *Pseudomonas* spp., *Staphylococcus aureus* and *E. coli*.

- Upset ecosystem

Monkeys, which falls into the categories of Mammals identified above in Diagram 7 could carry diseases like chikungunya, dengue, zika, aids, monkey pox, ebola, leprosy, rabies, tuberculosis, yellow fever and malaria. When these monkeys are released into the wild they negatively affect the country's depleted and sensitive ecosystem. If an animal ends up in a place where it has no predators, it can reproduce and wreak havoc on the natural ecosystem. For example, jaguars illegally trafficked into Trinidad and Tobago.



Similarly, species such as the Red-eared Slider, which were smuggled into Trinidad is included in the list of the world's 100 most invasive species as published by the IUCN (2013)⁴³. It is the most popular pet turtle in North America and is also popular as a pet across the rest of the world (IUCN).⁴⁴ Red-eared sliders are invasive because they can outcompete native turtles for food, nesting, and basking sites. They are also typically larger, more aggressive, and produce more offspring than native turtles. Red-eared Slider carry diseases such as Salmonella bacteria and respiratory diseases which can harm or wipe out native species (University of Texas, 2019).⁴⁵

- Increased presence of organised criminal groups

FATF (2020)⁴⁶ reports that the **high-value, low-risk nature of wildlife crime** attracts individual criminals, organised and disorganised crime groups, as well as corrupt businesses operating in legal industries. These groups interact across the illegal supply chain, linking the licit and illicit wildlife trade networks to collect, transport and sell wildlife.

Research indicates that organised crime networks engaged in IWT, like those focused on other profit-making ventures such as drugs or human trafficking are fluid, flexible and able to withstand the arrest of even the key players (Costa, 2021).⁴⁷

This has two consequences. First, the efforts of law enforcement alone – particularly when working within national borders – are not sufficient to tackle organised crime. Second, criminal groups operate much like other multinational companies, using the services of legitimate commercial transport, finance and other firms to carry out their illicit business.

Diagram 12 shows the Wildlife Laundering Cycle in which Organised Criminal Groups facilitate the collection, transportation and sale of illegal wildlife.

⁴³ IUCN, (2013), 100 of the World's Worst Invasive Alien Species, Available at: http://www.iucngisd.org/gisd/100_worst.php

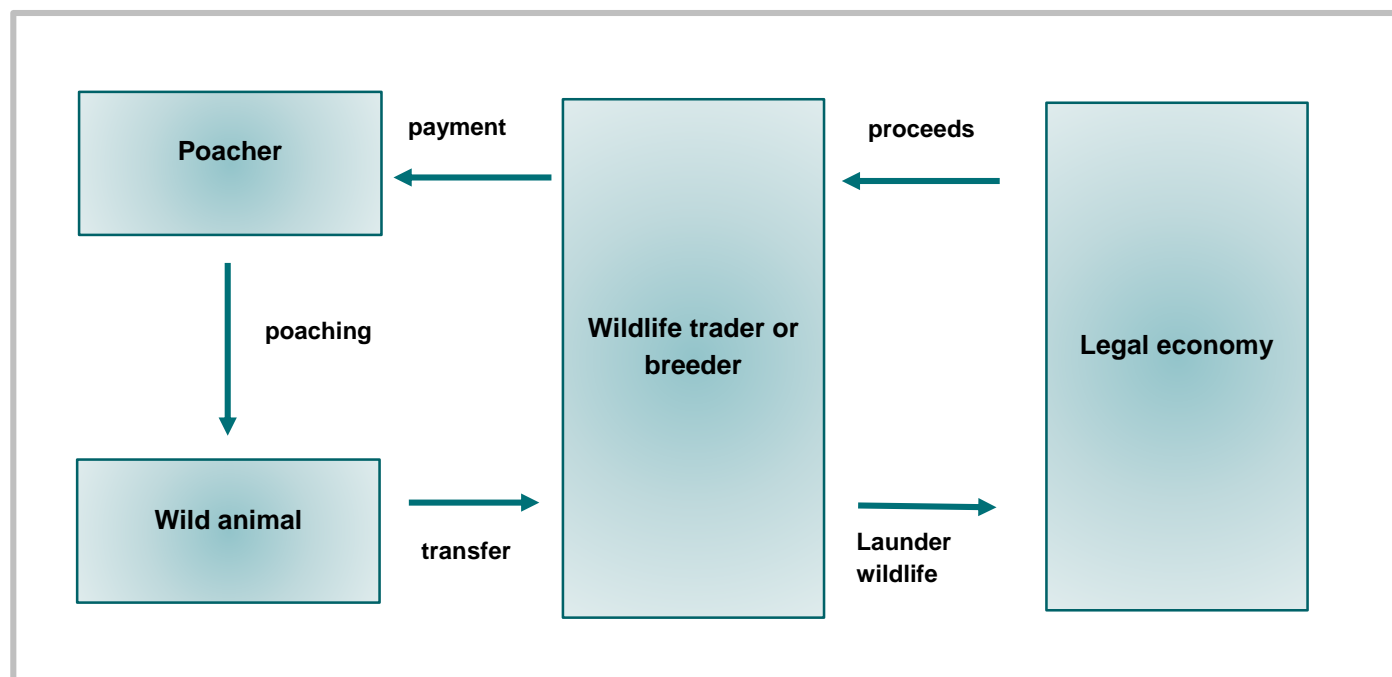
⁴⁴ Global Invasive Species Database, (2023), Species profile: Trachemys scripta elegans. Available at: <http://www.iucngisd.org/gisd/species.php?sc=71> on 20-10-2023.

⁴⁵ University of Texas, (2019), Campus Biodiversity: Red-eared sliders, Available at: <https://biodiversity.utexas.edu/news/entry/campus-biodiversity-red-eared-sliders>

⁴⁶ FATF, (2020), Money Laundering and the Illegal Wildlife Trade, Available at: [Money-laundering-and-illegal-wildlife-trade.pdf.coredownload.pdf \(fatf-gafi.org\)](https://www.fatf-gafi.org/publications/illicittrade/Pages/Money-laundering-and-illegal-wildlife-trade.pdf)

⁴⁷ Costa. J, (2021), Social network analysis applied to illegal wildlife trade between East Africa and Southeast Asia, Available at: <https://baselgovernance.org/sites/default/files/2021-03/210308%20SNA%20final%20report.pdf>

Diagram 12 showing the Wildlife Laundering Cycle



Source: UNODC – Wildlife Laundering – Adapted from Van Uhm, D. 2018. Wildlife and Laundering: Interaction between the Under and Upper World⁴⁸

Chairman of The Wildlife and Environmental Protection of Trinidad and Tobago remarked *“But who is to blame? The poachers? Yes, they do carry a part of the burden, but they are not the main part of the problem. Where there is demand, there will be a supply. The citizens are a major part of the problem as once there is the demand for these animals, poachers have a market and a reason to continue destroying the lives of many innocent animals.”*⁴⁹

In May 2023, a **young jaguar**, a **high-woods dog or water tyra** and almost thirty-three (33) **exotic birds** and three (3) **caimans** were seized from an abandoned campsite in Northwest Trinidad. See actual photos below of illegally trafficked wildlife.

⁴⁸ UNODC, (n.d.), The Illegal Trade in Wildlife in the Context of Zoonotic Diseases, Available at:

https://www.unodc.org/documents/e4j/Zoonotic_Diseases_Addition_to_E4J_Wildlife_Crime_Module_Series.pdf

⁴⁹ MALF, (2020), The Dark World of Animal Trafficking, Available at: [The Dark World of Animal Trafficking | Ministry of Agriculture, Land and Fisheries](#)



LIMITATIONS

During this analysis, several limitations were acknowledged including:

- Lack of biographical data which would have assisted in several areas including:
 - Profiling the subjects
 - Determining whether the subjects may be known for any other illegal/nefarious activity
 - Determining whether the subjects may be using the financial systems to launder money
 - Determining if the subjects are known in any other foreign jurisdictions
- The dollar value used to estimate the value of the IWT over the period January 2018 to July 2023 is historical in nature and may not accurately reflect the actual value of the IWT when considering changes in the demand and supply from the source and destination countries.
- The majority of addresses listed in the dataset are the residential addresses of the persons/businesses held with the illegal wildlife and not necessarily where the illegal wildlife was discovered.

CHAPTER 6 – RECOMMENDATIONS AND CONCLUSION

The FIUTT, through this strategic analysis, highlights among other things the adaptability of the IWT as well as the urgent and continued need for closer partnerships between local intelligence and investigative agencies and the MALF. This cooperation also needs to extend to local governmental departments, private sector or non-government organisation (NGO) as well as regional and international counterparts. This prominent issue of IWT appeals for members within the AML/CFT framework to continuously seek new initiatives, regulations and policies to counter the effects of IWT.

Some of the recommendations from this strategic analysis are as follows:

- Given that Trinidad and Tobago is in the process of conducting a National Risk Assessment (NRA), IWT should be assessed within the NRA, in compliance with FATF Recommendation 1. The risk should be assessed and adequate measures applied by all relevant agencies to ensure that the risk is properly mitigated.
- Implement a system for efficient and accurate recording of data by competent authorities including the MALF and Law Enforcement Authorities to ensure that a comprehensive suspect profile, smuggling methods, trafficking routes and existence of organised crime groups can be identified. This allows for a fair assessment of the risks involved and strengthens detection of IWT.
- Strengthen Regional and International Cooperation between countries through treaties like CITES to ensure a united front against IWT. Domestic multi-agency cooperation should be common practice for combatting IWT, involving the MALF (Forestry Division) Trinidad and Tobago Police Service (TTPS), Customs and Excise, Coast Guard, Environmental Authorities, FIUTT and other relevant domestic agencies for sharing information, intelligence and conducting joint investigations where appropriate.
- T&T can approach CARICOM (Caribbean Community) with the idea of forming a joint regional CITES Scientific Authority and Wildlife Enforcement Network (WEN).
- Boost Enforcement by increasing (i) the number of Game Wardens as well as supporting staff, (ii) funding for continued training and sensitization programs with TTPS, Customs and Excise, Coast Guard and other state agencies and (iii) increase resources to provide equipment (small crafts, drones, tablets, vehicles, weapons, communication equipment, protective gears, wildlife handling kits, technology to help capture social media sales etc.) that will assist MALF officers. Additionally, utilize the handbooks produced by MALF as a guide on how to proceed when dealing with wildlife offences and making necessary updates as the risk changes.
- Public awareness and Education is imperative to ensure that the wider society is aware of the ecological, health and economic impacts. The launch of campaigns to notify and educate the general public about the negative consequences of IWT with the aim of reducing the demand for wildlife animals smuggled into Trinidad.

- Collaborative efforts between the Office of the Attorney General and Legal Affairs, MALF (Forestry Division) TTPS, Customs and Excise, Coast Guard, Environmental Authorities to develop enforcement, prosecution and sentencing guidelines to combat inconsistencies surrounding IWT and how it can be addressed.
- Law Enforcement agencies should be mandated to conduct parallel financial investigations alongside those into the predicate IWT offence. This would enable compliance with FATF Recommendation 30 and generally accrue three operational benefits including:
 - identifying additional evidence to support the prosecution of the predicate offence;
 - identifying others involved in the wider criminal network; and
 - identifying the profit from the crime, enabling successful restraint and eventual confiscation of the proceeds.
- Work with Reporting Entities (Financial Institutions and Listed Businesses) to identify indicators for suspicious transactions. FIUTT can get involved in supporting financial investigations into wildlife crime through:
 - Working with Customs and Excise and MALF to identify the individuals and/or organisations suspected to be involved in IWT;
 - Based on the identification of the suspects the relevant LEAs can seek the assistance from the FIUTT to analyse the financial flows associated with seized and confiscated goods;
 - Detecting illicit wildlife activities by analysing suspicious transaction reports and other financial intelligence. Analysis of these types of data can lead to the development of Operational and Strategic Analysis Reports, Typologies and Advisories which can help LEAs, Competent Authorities, Reporting Entities and members of the Public identify red flags surrounding IWT, illegal ports of entry, organised crime groups or legitimate organisations involved in IWT and other illicit activities and measures which can be taken to report matters concerning IWT.

CONCLUSION

Given the prominence of IWT within the global Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) environment, the FIUTT, in keeping with FATF Recommendation 1⁵⁰, attempted to gain an understanding of the risk associated with IWT. This Strategic Analysis report based on the data analysed from MALF highlights that IWT in T&T is a concerning issue. The high-value, low-risk nature of IWT appears to be attractive to perpetrators in T&T who can easily capitalise on the existence of well-established cargo routes (both legal and illegal) coupled with porous borders, facilitate trade with either illicit products being concealed with legitimate cargo or illicit products being smuggled. IWT also poses a significant threat to T&T's biodiversity, ecosystems and public health.

IWT is also often regarded as a less serious crime compared to others such as drug trafficking, which is reflected by limited deployment of resources to investigate IWT and the limited number of cases that receive serious penalties. This is evident by the number of fines and cautions issued by the MALF compared to the number of arrests made by Law Enforcement. Legislation can also be reviewed so as to ensure that the penalties/fines are effective, proportionate and dissuasive.

In order to effectively combat IWT, there needs to be high level support in order to address the necessary funding, staffing and training issues. Key stakeholders such as the MALF should increase collaboration with LEAs and other relevant domestic agencies in an attempt to combat IWT. Agencies can utilize MOUs to ensure that there is the exchange of intelligence/information and a concerted effort from key stakeholders, encompassing rigorous enforcement and public engagement.

⁵⁰ FATF (2012-2023), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, www.fatf-gafi.org/recommendations.html