

Following the Money Trails of the Illicit Wildlife Trade

Introductory Seminar on Anti-Money Laundering (AML) and Trade-based Money Laundering (TBML) Investigations Techniques to Address Illegal Financial Flows Associated with Wildlife Trafficking

5 August 2021 | 14:00 – 16:00 GMT+8 | via Zoom

The webinar will discuss typologies and money laundering and trade-based money laundering trends linked to the illegal wildlife trade (IWT), as well as practical examples of how governments, the private sector and civil society can tackle IWT through targeted investigations.

The webinar is aimed at compliance and regulatory experts of participating banks of the Trade and Supply Chain Finance Program (TSCFP) of the Asian Development Bank. The event will introduce tools and initiatives financial professionals can support to increase detection or IWT such as the [ACAMS WWF Ending Illegal Wildlife Trade Professional Certificate Course](#), already adopted by the ADB for the TSCFP participating banks.

Organized by Asian Development Bank (ADB) Trade and Supply Chain Finance Program (TSCFP); Association of Certified Anti-Money Laundering Specialists (ACAMS); and World Wide Fund for Nature (WWF)

AGENDA

OPENING AND INTRODUCTION (20 Minutes)	
14:00-14:05	Introduction and scene-setting by moderators <ul style="list-style-type: none"> Nana Khurodze, Investment Specialist, Trade and Supply Chain Finance Program, Asian Development Bank Dr. Scott Grob, AML Director, Association of Certified Anti-Money Laundering Specialists (ACAMS)
14:05-14:20	Welcome remarks <ul style="list-style-type: none"> Livia Esterhazy, Chair of the WWF Asia Pacific Growth Strategy and CEO of WWF New Zealand
PRESENTATIONS AND MODERATED SESSIONS (1.5 Hours)	
14:20-14:50	Trends and Typologies in Financial Flows from Illegal Wildlife Trade in East and Southeast Asia <p>Presenter:</p> <ul style="list-style-type: none"> Julian Newman, Campaigns Director, EIA (Environmental Investigation Agency) <p>Discussants:</p> <ul style="list-style-type: none"> Sharon Pamplona, Head of Financial Crime and Money Laundering Reporting Officer (MLRO), ANZ Bank Hong Kong

	<ul style="list-style-type: none"> • Ben Brock, Wildlife Crime Officer, TRAFFIC <p>Q&A Objective: Identify transnational organized links of IWT across the Asia region, typologies, modus operandi, and recent case studies, analyses of specific patterns, trends, and recommendations for AML practitioners. This session will also discuss specific red flag indicators, criminal network diagrams, identified corruption vulnerabilities, lists of associated high-risk entities, and data on convergence between wildlife and other crimes.</p>
14:50-15:20	<p>Trade-based Money Laundering and IWT</p> <p>Speakers:</p> <ul style="list-style-type: none"> • Gary J. Wilson, Senior Vice President and Country Head of Financial Crime Compliance, Thailand, Standard Chartered Bank (Thai) <p>Discussants:</p> <ul style="list-style-type: none"> • Joseph Simms, Attaché to Hong Kong, U.S. Homeland Security Investigations (HSI) • Brian Gonzales, Head of Protection of Endangered Species, WWF Hong Kong / WWF Asia Pacific Counter-Illegal Wildlife Trade Hub <p>Q&A Objective: The session will look into physical movement of IWT through the trade system, and potential red flags and risk indicators that can mitigate these risks. The international trade system is clearly subject to a wide range of risks and vulnerabilities that can be exploited by criminal organizations and terrorist financiers. In part, these arise from the enormous volume of trade flows, which obscures individual transactions; the complexities associated with the use of multiple foreign exchange transactions and diverse trade financing arrangements; the commingling of legitimate and illicit funds; and the limited resources that most customs agencies have available to detect suspicious trade transactions. (FATF)</p>
15:20-15:50	<p>Introduction to Identifying the Ultimate Beneficial Owners: International Standards and Practices</p> <p>Speaker:</p> <ul style="list-style-type: none"> • Lisa D. Kelaart-Courtney, Director, Office of Anticorruption and Integrity, ADB <p>Discussant:</p> <ul style="list-style-type: none"> • Sirirut (Wiwek) Rattanamongkolsak, Anti-Money Laundering Office (AMLO) of the Royal Thai Government <p>Q&A Objective: Participants will learn how to determine controlling ownership interests, structures designed to conceal beneficial ownership, and identifying who actually exercise control.</p>
GENERAL QUESTION AND ANSWER SESSION, FEEDBACK AND CLOSE (10 Minutes)	
15:50-16:00	<ul style="list-style-type: none"> • Dr. Scott Grob, ACAMS • Nana Khurodze, ADB • Brian Gonzales, WWF

Background

Profit is the most important driver behind the global illegal wildlife trade. The sale of illegal wildlife products generates billions in revenue annually. Meanwhile, the illicit financial flows from illegal wildlife trade transit around the globe through the global financial system and into the hands of criminal networks. Along the way, the proceeds of crime run afoul of laws and international conventions, weaken institutions by fueling more poaching expeditions and reward corruption. Prosecuting money laundering and other economic crimes associated with wildlife trafficking helps dismantle the environment allowing it to flourish and creates a more effective deterrent.¹

In October 2016, CITES recommended the incorporation of anticorruption efforts, including anti-money laundering, into efforts to counter wildlife trafficking.² In 2020, the Financial Action Task Force (FATF) issued a report on “Money Laundering and the Illegal Wildlife Trade” aimed to address the financial flows from the illegal wildlife trade (IWT) by identifying and assessing money laundering risks relating to IWT and by ensuring that national laws and powers for law enforcement allow authorities to go after the finances of wildlife traffickers, and to pursue financial investigations.

In September 2019, at the 73rd session United Nations General Assembly, the 193 Member States adopted its fourth resolution on tackling illicit trafficking in wildlife. The Resolution calls upon Member States to integrate, as appropriate, the investigation of financial crimes linked to wildlife trafficking into wildlife crime investigations, and to increase the use of financial investigation techniques and public private collaboration to identify criminals and their networks.

In July 2020, Financial Action Task Force (FATF) published the first global report on money laundering from IWT. The report lays out a clear path that national authorities and the private sector can take to effectively identify and disrupt financial flows from this crime.

In October 2020, ACAMS and WWF launched a free training certificate for compliance professionals and others seeking to protect their organizations from the threats of illicit finance linked to IWT. The certificate is the result of a recent global partnership between WWF and ACAMS to drive collaboration in the fight against what the FATF has called a “major transnational organized crime.” United for Wildlife, The Royal Foundation of The Duke and Duchess of Cambridge and Basel Institute on Governance are supporting partners on this global effort to bolster awareness of IWT risks among the compliance community.

In January 2021, the Egmont Group of Financial Intelligence Units issued a “Financial Investigations into Wildlife Crime” Report, designed to provide financial intelligence units & relevant stakeholders with a detailed understanding of how FIUs can get involved in supporting financial investigations into IWT and more broadly, wildlife crime.

In June 2021, leaders of the G7 Summit have issued a comprehensive communique to tackle environmental crime, IWT, and the more significant environmental degradation. The G7’s Nature Compact’s Pillar 1 recognizes the connection of organized crime with IWT and the role of AML investigations in fighting the illicit trade. COP15 (Kunming, Oct 11-24) and COP26 (Glasgow, Nov 1-12) will become pivotal points for building consensus and forwarding green initiatives.

In 2021 additional measures were identified by the Egmont Group of Financial Intelligence Unit through their “Financial Investigations into Wildlife Crime” report, which provides an overview of the key species, industries and concealment methods implicated in the illicit trafficking of wildlife.

¹ United Nations Office on Drugs and Crime, “Enhancing the Detection, Investigation, and Disruption of Illicit Financial Flows from Wildlife Crime,” 2017, 25. https://www.unodc.org/documents/southeastasiaandpacific/Publications/2017/FINAL_-_UNODC_APG_Wildlife_Crime_report.pdf.

² Convention on International Trade in Endangered Species of Wild Fauna and Flora, Seventeenth Meeting of the Conference of the Parties, “Prohibiting, Preventing, and Countering Corruption Facilitating Activities Conducted in Violation of the Convention,” October 5, 2016. <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-28.pdf>.