



## Project INAMA: situation analysis and first

Launched in October 2014, the INAMA project aims to strengthen the enforcement capacity of Customs administrations in Sub-Saharan Africa, while focusing on the illegal trade in wildlife, particularly on species listed in the appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

THE CONVENTION REGULATES international trade in CITES-listed animals and plants, and this involves addressing both legal and illegal trade. For domestic or international trade in wildlife to be described as illegal or as ‘illicit wildlife trafficking,’ which is often used to refer to illegal trade, it must contravene either domestic or international law, or both.

Effective application of the CITES Convention depends largely on control

over the issuance, inspection and acceptance of CITES documentation, as well as detecting wildlife that is being traded illegally.

The INAMA project’s capacity building activities are organized into three components:

- Institutional and organizational development – participants assess their own capacity building needs at the national level, and this assessment

is followed by scoping missions. The objective being to provide participating countries with tailor-made support on the basis of the findings of these missions;

- Intelligence – participants follow basic and advanced training on intelligence to improve their capacities in all the relevant phases of the intelligence cycle, namely the collection, evaluation, collation, analysis, dissemination and re-evaluation of data, as well as on advanced intelligence analysis principals, tools, and techniques. A selected group of Customs administrations are provided with additional support to strengthen their intelligence function;
- Enforcement – participants learn through practical courses to plan and conduct enforcement operations, as well as to manage investigations through the use of a wide range of techniques, such as the conducting of controlled deliveries.



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generally do not use those enforcement modalities.

#### **Risk assessment practices and technologies**

Fifty per cent of the administrations do not have an intelligence unit in place, and none of them have Intelligence officers dedicated specifically to CITES issues. There is also a general lack of CITES risk indicators, and a recognized weakness in the development and dissemination of risk profiles covering CITES shipments. In fact, CITES related items do not appear in the risk register of at least one half of the administrations.

#### **Inter-agency cooperation**

Fighting wildlife crime requires concerted efforts involving the pooling of financial, human and information resources. Sharing intelligence, especially, is a critical prerequisite to effectively fight the phenomenon. However, the level of inter-agency cooperation is still weak, and most of the countries do not have a specific multi-agency enforcement team in place.

Moreover, only a few administrations have been involved in joint exercises with other Customs administrations, such as global enforcement operations targeting illicit wildlife trafficking, although such exercises could help them to develop information networks and improve their risk indicators.

#### **Corrupt practices**

A number of CITES-listed species are high-value items targeted by organized crime groups, and this makes the officers responsible for regulating trade in these specimens vulnerable to attempts to corrupt them. It has been generally recognized that there is a lack of incentive to officers based at border posts to avoid exposure to corruption,

and a lack of a suitable vetting process during staff recruitment.

Although fighting corruption is not a focus of the project, discussions are held with participating officers on efforts that should be made to mitigate the risks of corruption in the trade chain, and to ensure that adequate integrity policies and procedures are in place in national government structures to prevent organized crime groups from corrupting officials.

#### **Controls focusing on imports**

Revenue collection is the priority of most of the participating administrations. Thus, more emphasis is placed on the control of imports, leading to a much lesser allocation of resources to the control of exports. This reality poses a serious issue as these countries are wildlife range countries, with the illegal trade in wildlife occurring at both export and transit levels.

#### **Capacity building activities implemented**

Based on the results assessment made by each participating country, the situation appears to be rather gloomy. However, the positive feedback received from the more than 120 officials who have been trained under the scope of the project gives hope that crucial progress may be made in the near future.

At the regional and sub-regional levels, 11 training sessions and workshops have been held so far:

- one on the controlled delivery of illegally traded wildlife products;
- two on basic intelligence;
- two on advanced intelligence;
- two to develop and validate the Institutional Assessment Tool on the enforcement of the CITES Convention;

## results

### **Infrastructure, legal capacity and know-how**

All countries participating in the project are Contracting Parties to the CITES Convention, but awareness of the Convention's provisions and of wildlife issues in general is rather low among officers who, in most countries, do not clearly understand their role in wildlife preservation.

Unfortunately, the enforcement of the CITES Convention is not a priority in several participating countries and does not feature in the strategic planning process of most of them, and Customs administrations face the challenge of weak government support for their role in fighting the illegal wildlife trade.

As a consequence, although most administrations have the legal power to conduct investigations into the illegal trade in species regulated by the CITES Convention, with only a few of them having the legal power to conduct controlled deliveries in this domain, they

- one on cross-border cooperation and coordination;
- two focusing on investigations;
- one on enforcement operations planning.

Support was also provided at the national level. Uganda received technical assistance on evidence handling and seizures. This assistance was delivered by WCO experts working under the COPES project, which focuses on the working methods used to combat fraud, from the identification of an offence to the storage of seized assets, including reporting, collecting and preserving evidence.

Moreover, Malawi and Zambia received support in strengthening their intelligence functions, and an exchange of personnel between the Customs administrations of China and Kenya as well as between China and South Africa was organized with the aim of strengthening cooperation between officers, which could facilitate the conducting of controlled deliveries in the future.

#### First results achieved

The project makes reference to several performance indicators as follows:

- increase in the number of seizures of illegally traded wildlife products;
- increase in the number of wildlife crime cases brought to justice through the efforts of Customs officers;
- at least 15 participating administrations to have completed the self-assessment;
- increase in the amount of information related to illegally traded wildlife products shared with other administrations through the WCO CENcomm communication platform;
- at least 3 out of the 25 participating administrations to have developed a work plan by 2017 on how to establish an intelligence unit.

So far, 13 Customs administrations have completed their self-assessment, and two

have drafted an intelligence framework and a work plan to strengthen their intelligence functions.

Some officers have also started sharing information about seizures occurring in their countries, such as in Burkina Faso where 26 pairs of elephant tusk, en route to Côte d'Ivoire in a bus, were found and seized in January 2017 by the mobile Customs unit.

Some of the performance indicators will only be able to be measured at the end of the project. More time will also be required to achieve some of the expected results, which might only be realized after the project completion.

As with many capacity building projects, the main challenge to overcome is always ensuring the sustainability of the results already obtained and those to come.

#### More information

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## INAMA at a glance

### Objective

To address the illegal trade in endangered species by improving Customs officers' capacity to enforce CITES regulations.

### Duration

5 years (2014-2019)

### Expected results

- Customs administrations:
  - increased capacity to conduct an analysis of their enforcement needs, and to measure their performance in terms of enforcing CITES regulations;
  - Implement new tools and enhance new structures, enabling their officers to better enforce CITES regulations.
- Customs officials:
  - enhanced awareness and knowledge of CITES regulations, and how to enforce them, in particular when it comes to conducting operations and controls;
  - increased capacity to collect, process and disseminate intelligence.

### 25 Participating countries\*

Angola, Benin, Botswana, Burkina Faso, Central African Republic, Cameroon, Congo (Republic of the), Côte d'Ivoire, Democratic Republic of the Congo, Gabon, Gambia, Ghana, Kenya, Malawi, Madagascar, Mozambique, Namibia, Nigeria, Rwanda, South Africa, Tanzania, Togo, Uganda, Zambia, and Zimbabwe.

*\*Countries in Asia will participate in specific activities of the project, and additional countries in Africa are expected to join the project.*

### Funding partners

Sweden, the United States Department of State, the German Federal Enterprise for International Cooperation (GIZ), and the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).