BASEL INSTITUTE ON
GOVERNANCE

Working Paper 33

# A worm's-eye view of wildlife trafficking in Uganda – the path of least resistance

Saba Kassa, Jacopo Costa, Robert Lugolobi and Claudia Baez-Camargo | October 2020

Basel Institute on Governance
Steinenring 60 | 4051 Basel, Switzerland | +41 61 205 55 11
info@baselgovernance.org | www.baselgovernance.org

# Table of contents

# Figures and tables

# About the authors

**Saba Kassa, Public Governance Specialist, Basel Institute on Governance**

Saba Kassa supports the Basel Institute's Public Governance division in the development and implementation of its various research and technical support projects. Saba holds a PhD in International Development Studies from Erasmus University Rotterdam, a master' in International Development Studies from the University of Amsterdam, as well as a Master of Public Administration from Erasmus University Rotterdam. saba.kassa@baselgovernance.org

**Jacopo Costa, Senior Research Fellow, Basel Institute on Governance**

Jacopo Costa focuses on conducting research and analysis on the social networks underlying illegal wildlife trafficking, corruption and other organised and financial crimes. Jacopo holds a PhD in Sociology and Political Studies from the University of Turin, and a Master in International Relations from the University of Florence, Italy. jacopo.costa@baselgovernance.org

**Robert Lugolobi, Governance and Anti-Corruption Specialist**

Robert Lugolobi is a governance and anti-corruption expert with over twenty years' experience working on anti-corruption and governance-related issues with public agencies, civil society organisations and development partners. Robert holds a Master in Anti-Corruption from the International Anti-Corruption Academy, Austria. rlugolobi03@gmail.com

**Claudia Baez Camargo, Head of Public Governance, Basel Institute on Governance**

Claudia Baez Camargo is responsible for the development, oversight and management of the Basel Institute's research activities, as well as delivering technical assistance projects aimed at preventing corruption in the public sector. Claudia holds a PhD in Political Science from the University of Notre Dame, USA and a Master in Economics from the University of Cambridge, UK. claudia.baez-camargo@baselgovernance.org

# About this report

This report was funded by PMI IMPACT, a grant award initiative of Philip Morris International (PMI). In the performance of their research, the authors maintained full independence from PMI. The views and opinions expressed in this document are those of the authors and do not necessarily reflect the views of PMI. Neither PMI, nor any of its affiliates, nor any person acting on their behalf may be held responsible for any use which may be made of the information contained herein.

# Executive summary

This research digs deep into the dynamics feeding a multi-billion-dollar global illicit trade in wildlife and wildlife products. Uganda, a hub for wildlife trafficking in Africa, is the focal point of the analysis. It tackles a simple two-part question: why and how does wildlife trafficking happen in Uganda?

Our first thoughts may go to the poachers. Facing challenging socio-economic conditions, they may see participating in the illegal trade as an opportunity to make money for themselves and their families. Such assumptions are not wrong, this research shows. Individuals living near wildlife habitats, or along the first stages of the trading routes, often find that the opportunities to generate income and thereby overcome socio-economic hardships outweigh the risks of penalties and sanctions.

But the story does not end there. Equally important, if not more, is the broader governance context which allows illicit trade to flourish in Uganda. The research supports the hypothesis that where the rule of law is weak and corruption and impunity thrive, key prevention and enforcement measures against wildlife trafficking can easily be undermined. At the individual level, the research also shows that utilitarian perceptions of wildlife, coupled with narratives of trafficking as a benign and legitimate form of informal trade that brings wealth and status, reinforce the social acceptability of participating in the trafficking and therefore help to fuel it.

Now how does Uganda become a hub for wildlife trafficking? This, the research shows, is because it is the path of least resistance. It is relatively easy for traffickers to establish an orchestrated and organised supply chain of wildlife products that move into, through and out of Uganda. A dynamic infrastructure of key people in key roles in key locations facilitate it. The social structure of the network means that these individuals can organise themselves as a collective and pursue a strategic goal.

Wildlife products enter Uganda through both official and unofficial borders, are concealed and consolidated and then exit the country, predominantly via road to Kenya or air via Entebbe Airport. To prevent these operations from being detected, investigated and sanctioned, traffickers rely on collusive relationships with public officials with relevant access and authority at local and central levels.

To fight wildlife trafficking, therefore, the answer cannot only be found in and around the wildlife habitat. Fences cannot be built high enough, and rangers cannot be equipped well enough, to compensate for and overcome the underlying structural drivers of weak governance systems and constrained socio-economic contexts that provide the macro-level conditions for all sorts of illegal activities, including wildlife trafficking, to flourish in Uganda. Efforts by both national governments and international bodies to curtail wildlife trafficking should therefore also consider, account for and address the underlying structural problems of high levels of poverty and corruption that provide a conducive environment for illicit activities and economies.

The silver lining is that even in such challenging settings, islands of integrity can develop. Uganda has shown this in other areas and sectors.[1] It is hoped that this can provide the building block to start the conversation through which Uganda becomes the path of most resistance for wildlife traffickers.

[1] Islands of integrity are present in Uganda's health sector, where bribery reduced between 2011 and 2015 with the introduction of a health monitoring unit and in Uganda's tax services, where bribery reduced between 2010 and 2014 with the introduction and strengthening of various governance measures in the sector. See footnote 16 in the Conclusion for more details.

*"This is a story about how the illicit trade in wildlife is fuelled. It starts of course in wildlife habits, where the attention often falls on the small poachers. This is, however, misleading. The poaching is only part of the crime, a part of the larger story that unfolds when one tries to understand why and how wildlife trafficking happens. Organised crime generates and builds up a full system that reaches the ground but is driven top-down rather than the other way around. Those at the local level are only secondary actors in the bigger stage where crime develops. And if you bring money and power, you are always able to find someone to help you..."*

*Extract from conversation with an expert on illegal wildlife trade in Uganda*

# 1 Introduction

This report is a key output of a multi-disciplinary programme of work of the Basel Institute on Governance on intelligence-led action against financial crime in illegal wildlife trade (IWT). The programme focuses on uncovering and targeting illicit financial flows, strengthening the ability of law enforcement agencies in East Africa to investigate and prosecute transnational IWT-related financial crimes, and improving coordination across public, private and non-governmental sector actors. The research component, and the creation of this report, is funded by PMI Impact.

The fight against wildlife trafficking is a global one. Wildlife trafficking constitutes the fourth-largest form of illicit trade flow in the world. Its prevalence is often explained in economic terms: it is a "low-risk, high-profit" trade. Global efforts are therefore directed at increasing the "costs" of wildlife trafficking and reducing the rewards.

However, rational cost-benefit calculations by individuals seeking personal economic gain do not fully explain why wildlife trafficking is so prevalent. Nor, therefore, will it be solved by passing new laws and strengthening law enforcement alone. Scholars as well as development and law enforcement practitioners increasingly recognise the importance of considering the way in which the local context and socio-cultural structures (so-called behavioural drivers) influence the behaviours of individuals and their propensity to engage in wildlife trafficking.

This social context is not only an anchor for decision-making but also influences the strategies through which wildlife trafficking is organised. Individuals are part of informal networks. Social connections in and between the networks facilitate the transportation of wildlife products from poachers to buyers across vast geographical spaces. Public officials can be part of such networks too. In such cases those individuals, rather than enforcing the law, use their position to cover up the trafficking of wildlife products out of parks, cities and ports in East Africa.

This approach of emphasising context-sensitive behavioural drivers anchors the research activities that the Public Governance division is leading in Uganda as part of the wider programme of work of the Institute. Uganda is a hub for wildlife trafficking in East Africa. High volumes of wild animal products are transported into, through and out of Uganda using various methods and strategies. Taking a worm's-eye perspective, the research aims to provide further understanding on:

- Why wildlife trafficking happens, by focusing on the economic and behavioural drivers of wildlife trafficking and the role of the broader governance environment in generating increased corruption risks in public offices mandated to prevent and combat wildlife trafficking.
- How wildlife trafficking happens, by focusing on the role and strategies employed by informal networks of poachers, middlemen and buyers to transport high volumes of wildlife products into, through and out of Uganda.

The findings are based on 47 interviews[2] with Ugandan-based and international anti-IWT experts (IGOs, NGOs, academics and public officials) and 8 focus group discussions with wildlife conservation and anti-corruption experts in Kampala, members of reformed poachers' networks in Western Uganda, and individuals living around a wildlife habitat in Northern Uganda. Together, these provide context-specific

[2] The research methodology is described in Annex I.

insights on the drivers and facilitators of wildlife trafficking in Uganda. The present report synthesises their observations and aims to contribute to the development of evidence-informed approaches to curbing the trade.

# 2 Why does wildlife trafficking happen?

This chapter explores why wildlife trafficking happens in Uganda by focusing on its drivers and facilitators. It explores the economic drivers of wildlife trafficking at the earliest stages of the chain as a way to satisfy economic needs. It elaborates on the broader environment of weak governance and rule of law that translates into increased corruption risks in public offices mandated to fight wildlife trafficking. It explains that this is reinforced by behavioural drivers, namely, characterisations of wildlife and wildlife trafficking as a benign form of informal trade.

## 2.1 Wildlife trafficking is a way to meet economic needs

The wildlife trafficking supply chain starts in and around rural areas near wildlife habitats. All kinds of different activities can be considered here, from carrying tusks on foot to another country to selling wildlife products to a local middleman or packing and loading them on vehicles destined for larger urban areas. The research aims to understand the drivers of this illicit behaviour, namely, the motivations of individuals to engage in the earliest stages of wildlife trafficking.

The conversations with the experts[3] converge around one primary driver: engaging in wildlife trafficking is driven by the desire to satisfy basic economic needs. Sustenance, money for school fees, health bills etc. are frequently mentioned by the interviewees in this regard as examples of such basic needs. The need for financial means is associated with the constrained socio-economic context of individuals living near such areas in East Africa. These dynamics are present in Uganda as many people struggle to meet household needs. Poverty levels are often higher than the national average near protected areas (Harrison, et al., 2015). This is compounded by long periods of conflict, particularly in Northern and Western Uganda, resulting in those living near the protected areas being further economically disadvantaged.

While the latest World Bank Poverty Assessment, dating from 2016, shows that the proportion of the Ugandan population living below the national poverty line declined from 31.1% in 2006 to 19.7% in 2013, many households remain vulnerable and are at risk of falling back into poverty. The Poverty Assessment report supports the experts' claim that the situation in regions of Uganda where the major wildlife habitats can be found (in the North, East and West) is more constrained. Progress in reducing poverty in Northern and Eastern Uganda in particular has been much slower. The proportion of the total number of poor people who live in these two regions actually increased between 2006 and 2013, from 68% to 84%. Moreover, households in Uganda's Northern, Eastern and Western regions also have much lower levels of human capital, fewer assets and more limited access to services and infrastructure than households in the Central region (World Bank, 2016).

[3] Informed by in-person and virtual interviews conducted with Ugandan-based and international anti-IWT experts (IGOs, NGOs, academics and public officials) and focus group discussions with wildlife conservation and anti-corruption experts in Kampala, Uganda.

The reality on the ground is that those who live close to wildlife habitats have it harder than those living in more urban areas, with poorer access to public services making them more vulnerable. The conversations with the experts refer to these broader challenging economic conditions faced by individuals living near wildlife habitats and around border areas and (rural) towns along the trafficking routes. The research suggests that in such contexts, opportunities to make money, even if they are against the law, may be taken on because they are a way to meet economic needs.

> *"When there is an immediate need for income, subsistence takes precedence over anything else. You have to feed your kids, get them to school."*

The conversations with the individuals living around the wildlife habitat in Northern Uganda[4] are illustrative in this regard. The participants discussed a story about a fictitious person named "Daniel". In this story, Daniel receives an offer from "Peter" to help move wildlife products such as ivory and rhino horn from one city to another in Uganda. The research participants were then asked what they thought most men/women would do in Daniel's situation.

> *"Daniel has a job as a daily labourer. He is a father and together with his wife, he raises his 5- and 2-year-old daughters. One day Daniel is approached by an old acquaintance named Peter. Peter asks him if he would be interested in helping his business. Peter moves wildlife goods, such as ivory and horn, from one city to another in Uganda. Peter could really use Daniel's help with different tasks, such as: packaging the wildlife goods in different boxes; stacking and organising these boxes in a local warehouse; and loading these boxes onto trucks ready for transport to other cities. The prospect of earning a substantially higher income than he has now has him interested. But he is not sure."*

In response to this story, half of the research participants note that most men and women in Daniel's situation would accept the offer. The main reason for this is because it would help provide a source of livelihood to meet family needs. This dynamic is explained in more depth in the reactions provided by four out of the five women in the group, who asserted that most women would accept such an offer. They reflected in their answer on their own financial circumstances, including experiences of being a single mother. It's a lucrative deal, they explained. Almost half of the research participants also agree that Daniel's family and friends would expect him to take the offer. Besides being a "lucrative deal", the research participants suggest that family and friends would support this decision because they would benefit from Daniel's gains.

Lacking alternative livelihood opportunities, a lucrative business deal to support "Daniel" and his family is viewed as an appropriate way to overcome poverty. The conversations with the individuals living around the wildlife habitat in Northern Uganda illustrate this as the decision to take Peter's offer would also be informed by the level of poverty in the household. The consequence of rejecting such an offer would be the persistence of poverty in the home. This may explain why many of the research participants state that if Daniel were to reject the offer based on the severity of penalties and risks associated with engaging with Peter, his family and friends would think he was a fool. The research suggests that while refusing a

[4] Informed by focus group discussions with individuals living around (and with knowledge on poaching and wildlife trafficking) a wildlife habitat in Northern Uganda. The discussions were not geared towards developing representative insights of bottom-up drivers of wildlife trafficking in Uganda; rather the conversations served merely as an entry point to engage with citizens living near wildlife habitats and explore their perceptions and understandings of wildlife and wildlife trafficking.

risky deal would be viewed as a wise decision by some in the group, the majority of the participants state that the *guaranteed* benefits, for instance, extra income to alleviate poverty, outweigh the *potential* risks and negative consequences for Daniel and his family.[5]

When risks and penalties are not considered a deterrent to engaging in illicit activities, this may generate further pressures on family members to take on such money-making opportunities, even if they are risky, in order to fulfil their financial responsibilities to each other. This too is illustrated by conversations with the individuals living around the wildlife habitat in Northern Uganda. The majority of the research participants agree that engaging in illicit activities and trade in Uganda is driven to some extent by the need to fulfil social pressures as well as socio-economic needs.

The conversations conducted with members of the reformed poachers' networks[6] in Western Uganda further illustrate these dynamics. The members have renounced poaching and engaging in the earliest stages of wildlife trafficking (i.e. poaching, transporting and selling wildlife products to local buyers). The members explain that their personal circumstances and the financial opportunities offered by the trade were the major drivers behind their past engagements. Leaving the "profession" resulted in ridicule and scorn by some. One participant explains that he was challenged on his decision with comments such as: "What good does it do to stop poaching when it provides good money and now you are walking around in torn clothes?"

Wildlife resources can provide the financial means to fulfil personal and family economic needs. Yet at the same time, there can be a negative impact when financial resources are not used prudently or when the risks of arrest or loss of life impact the family cohesion. Illustrative is that the conversations with the research participants around the wildlife habitat in Northern Uganda suggest that this balance tips in favour of providing for the family, irrespective of the severity of the penalties and risks associated with the illicit activity. The research therefore suggests that in constrained socio-economic contexts, and when people need resources for themselves and their families, their willingness to engage in "lucrative business opportunities" increases. This is true even if these "business opportunities" are against the law.


*Figure 1: Economic drivers of wildlife trafficking*

## 2.2 Wildlife trafficking is facilitated by a context of weak governance

[5] This can be associated with the broader dynamics in Uganda in which impunity for illicit behaviours is prevalent (see section 2.2.) Moreover, the opposite expectation can be found in countries like Rwanda for instance, where the risks and adverse consequences of engaging in illicit behaviours (such as corruption) drives different social expectations and outcomes because it would mean that the family members may lose the breadwinner when caught (Baez Camargo, Gatwa, et al., 2017)

[6] Informed by focus group discussions with members of reformed poachers' networks in Western Uganda.

In an effort to curb wildlife trafficking in Uganda, a new Wildlife Act was passed into law in 2019. The Standards, Wildlife and Utilities Court, specifically dedicated to wildlife crimes, had already been established in 2017. An intergovernmental committee, the National Wildlife Crime Coordination Task Force, has also been set up to co-ordinate anti-poaching activities and curb wildlife trafficking across the country. The conversations with the experts suggest that the tougher laws and more elaborate and coordinated efforts are critical to deterring wildlife trafficking in Uganda. One expert claimed that previously the sanctions against wildlife trafficking were so mild that suspects would even demand to be taken to court with the prospect of – after having pled guilty to the charges - only paying a small fine. The expectation was that the case would not be transferred to a higher court.

At the same time, the experts suggest that new laws, regulations and taskforces in Uganda are only as good as their implementation. While Uganda has come a long way since it was removed from the list of the so-called "Gang of Eight" (the worst offending countries in the ivory trade) and islands of integrity are present in the public sector (for instance in health and tax services), weak implementation is still seen by many interviewees as a major facilitator of wildlife trafficking in Uganda. Formal laws and structures of governance exist but often their application is constrained. Large governance indices on corruption in Uganda lift the veil a little on this. For instance, the most recent (2018) Worldwide Governance Indicators assesses the rule of law and regulatory quality in Uganda as relatively weak (-0.29 and -0.25 respectively)[7] (WGI, 2019). Transparency International's 2019 Corruption Perceptions Index ranks Uganda in 137th position out of 198 countries and scores it only 28 out of 100[8] (CPI, 2019).

A government survey report on governance, peace and security similarly acknowledges that "corruption in Uganda is characterized by grand-scale theft of public funds and petty corruption involving public officials at all levels of society as well as widespread political patronage systems" (Uganda Bureau of Statistics, 2017). Therefore, while a transparent rule-based administration of the law is ensured on paper, in practice high levels of informality are present in public office. One key way in which this is reflected is in the overlapping of public and private spheres in public office (Baez Camargo, Bukuluki, et al., 2017, Golooba Mutebi 2018).

Informal systems of governance enacted by networks of actors at all levels influence how power is exercised and who gains access to public resources. Informal governance networks are associated with high levels of systemic corruption in public office in Uganda (Golooba-Mutebi, 2018). Their practices are largely hidden from the public eye but their impact on the public sector is unquestionable, including to junior officials who carefully watch the behaviour of their seniors. This is highlighted by the conversations with the experts on the prevalence of public-sector corruption in Uganda.

The conversations with the experts suggest that corrupt officials are on the one hand driven by "grievances" (e.g. low or irregular pay) and on the other by an opportunity to secure wealth for the future and to nourish relationships and networks. Wealth is important because of the clientelist nature of politics, which is by no means unique to Uganda. In systems of clientelist politics, those appointed to public office are incentivised by the system to use their position to make money, including by diverting public monies for private benefits (Golooba-Mutebi, 2018). Informal clientelist networks redistribute corruptly acquired public resources as a way to maintain loyalty within the group and to co-opt and neutralise potential opponents outside the network. In such systems, the informal governance systems rely on such ill-gotten funds to enable the elite to stay in power.

[7] Governance score, measured on a scale from approximately -2.5 to 2.5. Higher values correspond to better governance.
[8] 0 is highly corrupt and 100 very clean.

Because public office provides multiple rent-seeking opportunities, public officials strategically aim to enter, maintain and improve their position in it. Public officials are often recruited and promoted through personal connections and by adhering to the informal rules and practices of the office. This generates even more corrupt behaviours. Requesting bribes may be the norm in the office, and bribery and favouritism can be used as a way to maintain these informal loyalties and connections with sponsors within and outside the public office.

This functionality of corruption creates a vicious cycle. The monetisation of public office contributes to corrupt behaviours of public officials. Public officials who engage in corrupt behaviours in turn increase the monetisation of public office. In such a context where existing internal governmental corruption controls provide insufficient constraints, public officials can easily be compromised. Consequently, widespread impunity for crimes big or small is the norm in Uganda.

The conversations with the experts refer to these corrupt practices of public officials under the large umbrella of "connivances". The literature informs that connivances comprise a wide range of illicit behaviours including "bribery, rent-seeking, patronage, local elite capture, embezzlement, collusion, payoffs, political corruption, customs mis-declarations, policy and legislative capture, kickbacks, cronyism, nepotism and fraud" (Williams et al., 2016, p.4). This research suggests that at the core of different forms of connivances is a corrupt relationship that transcends the formal public-private divide in public office. Public officials are strategically co-opted into criminal networks with an understanding and expectation of a continued exchange of money for the subversion of public authority for the benefit of the traffickers. Such corrupt bonds have the ability to undermine the existing rules and regulations in place to provide environmental protections.

The research suggests that a constrained governance system where corruption and impunity are pervasive generates corruption risks in public offices that can undermine key prevention and enforcement measures against wildlife trafficking. When compounded further by insecurity around wildlife habitats, country borders (for instance those between Uganda and the Democratic Republic of the Congo) and particular regions, it provides a propitious environment for illegal activities to flourish.

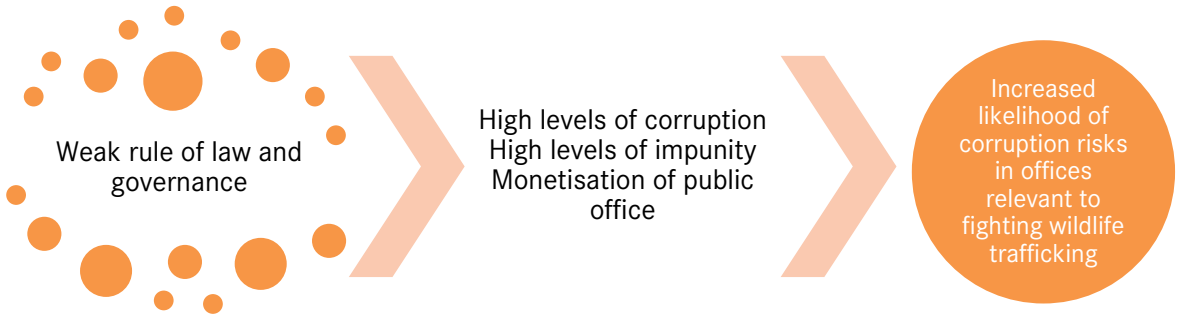



*Figure 2: Facilitators of wildlife trafficking*

## 2.3 Characterisation of wildlife trafficking as benign informal trade

### 2.3.1 Utilitarian perceptions of wildlife

The research suggests the importance of considering how people understand and frame the meaning of wildlife and wildlife trafficking within their broader context. These understandings do not come from within

but are drawn by relying on concepts used by others. "Concepts, categories, identities, prototypes, stereotypes, causal narratives, and worldviews" all influence how wildlife trafficking is understood (World Bank, 2015). The conversations with the research participants suggest that citizens and public officials may hold some or all of the following beliefs:

- Wildlife is not valuable
- Wildlife is a commodity
- Wildlife is owned by the state
- Wildlife is competition in terms of natural and public resources

**Wildlife is not valuable:** The conversations with the experts suggest that people living close to wildlife habitats often have indifferent or even negative perceptions of wildlife. Wildlife is often not considered valuable or ecologically important. In areas where wildlife consumption is prevalent, these views may be even stronger. For instance, wildlife may be considered as a delicacy or a gift from God to sustain humanity.

> ***"Many ordinary people know that wildlife and these animals are protected by law, but many of them are ignorant of the ecological values of animals."***

The discussions with the experts reveal that more positive values associated with wildlife can be present in contexts in which people living next to protected areas receive some financial benefits. Example of this are in well-managed protected areas where citizens are directly benefiting from the wildlife and take on a caretaker role. The conversations with the individuals living around the wildlife habitat in Northern Uganda illustrate this point vividly. A majority did not believe that it would hurt them in any way if the wild animals were to become extinct since they did not "receive any kind of benefits living near the wildlife".

**Wildlife is a commodity:** The research evidence suggests that wild animals are often viewed as a commodity. Wildlife is simply a natural resource and part of the local economy. Almost all participants in the focus group discussions around the wildlife habitat in Northern Uganda say that it is socially acceptable to use wildlife products as a source of income. Framing wildlife as a commodity implies the belief that wild fauna and flora are resources that should be utilised.[9]

**Wildlife is owned by the state:** Wildlife habitats are often protected by the state. This builds the notion that the wildlife is "owned" by the state. One of the experts said that rangers receive complaints from people near protected areas asking "to keep *their* animals away". Perceptions of wildlife as state-owned suggest that wild animals are not important because they are public assets that belong to everyone and therefore no-one. The negative association with state or public ownership is key to understanding why perceptions prevail that wild animals are resources that are up for grabs.

**Wild animals compete with humans for natural resources:** The research evidence suggests that wildlife is often perceived as competition for natural resources such as land and water. Scarcity of resources may set the stage for increased human-wildlife interactions and conflict. Wild animals can destroy land and property, including crops. Direct encounters between people and wildlife can result in loss of life on both sides. In a context in which economic activities are based on subsistence, this may fuel animosity and the need for "pre-emptive measures" to neutralise such threats. One expert claims

[9] Such perceptions can be fuelled or sustained by actions of the government that invoke the same sentiment. Examples are plans to sell part of Mabira Forest and Bugoma Forest to investors or efforts to dam Murchison Falls.

that rangers frequently receive complaints from those living close to wildlife habits along the lines of: "We are not supposed to hunt, we are supposed to protect them, but no-one protects us from them."

> *"The human-wildlife clash drives individuals to engage in trafficking. We have to consider that the crops are the resources that guarantee people's survival. How can they can make money if their crops are destroyed by animals?"*

**Wild animals compete with humans for public resources:** The experts suggest that there is often a perception that the state values wildlife more than the people living near wildlife areas. In many cases, wildlife is protected, managed and cared for by the state. In a context in which people often have to "fend for themselves" with little perceived support from the state, efforts to protect wildlife are viewed as unjust. This protection of animals is seen as an indicator of value placed on animals at the expense of people.

### 2.3.2 Perceptions of wildlife trafficking as benign

Characterisations of wildlife trafficking in Uganda convey the narrative that wildlife products are valuable and that wildlife trafficking is a benign form of informal trade.

**Wildlife products are valuable:** The research evidence suggests that high-value wildlife products, such as ivory and rhino horn, invoke few negative associations. Such wildlife products are not seen as "bad". The experts say that such products are regarded as simply "dead animals". In fact, wildlife products are often framed positively for their value (e.g. in terms of medicinal or health benefits) and rarity and as a symbol of authority, power and status. Wildlife products fulfil a historic bartering function and are used in social functions such as marriages, funerals and cultural rituals.

**Wildlife trafficking is a benign form of informal trade:** The research participants share that wildlife trafficking is often characterised as an informal trade. Informal economies and "small trades" are prevalent and crucial for the supply of goods to the wider Great Lakes region (Titeca & Célestin, 2012). Wildlife trafficking is considered part of this larger informal economy and trade. Framed in this way, wildlife products are viewed not much differently to any other informally traded good.

> *"Wildlife products are considered no different to sugar or cars."*

The experts state that those people living close to wildlife habitats often believe there is no real harm associated with wildlife trafficking. While people may know it is against the law, this crime is not viewed as a "real" or "serious" crime. One research participant shared that it is perceived to be similar to committing a driving violation. Another research participant shared that people carrying wildlife products would plead guilty, thinking it was not a serious offence. In contexts in which hunting is a cultural practice, similar benign perceptions of poaching and the early stages of trafficking may be prevalent.

> *"A lot of these guys believe that there is no victim. You did not just go and murder someone. There is no victim."*

The conversations with the individuals living around the wildlife habitat in Northern Uganda further illustrate this point. The harm and injury of wildlife trafficking is associated with the *human* costs and consequences, not the loss of wildlife or animal welfare. The seriousness of the crime relates to the legal and social consequences of being caught engaging in wildlife crime (being arrested, detained and sanctioned and the consequences of this on the family) rather than the actual act itself.

Public officials too may hold the view that wildlife crime is not really important. When a whistle-blower went to the police to report the theft of ivory from the Uganda Wildlife Authority's stockroom, the officers reportedly said the following: "Who cares? These are just dead elephants" (Cakaj & Lezhnev, 2017). The underlying sentiment is a belief that crimes against animals are not important, especially when they are dead and cut up. This is particularly true in the contexts described above, in which many people struggle to survive and the "defence" of animals fuels even more resentment. The experts suggest that this sentiment may also be reinforced by the "tone from the top", i.e. the (weak) implementation of wildlife laws and related political priorities, policies and budgets.

> *"Magistrates or judges often consider this a small and victimless crime. They say 'this is a case about animals'. With views like that, they cannot be effective in fighting wildlife trade."*

Similarly, public officials may hold the view that wildlife crime is a less of an important crime in comparison to those committed against humans. In contexts in which the quality of institutions is low, decisions need to be made about where to dedicate the limited financial and human resources. The experts share that the perception of the severity of the crime often influences these decisions. For instance, before the creation of the dedicated wildlife court in Uganda, a judge may have placed a wildlife trafficking case towards the bottom of the pile.

Therefore, the research suggests that utilitarian perceptions of wildlife as a public and natural resource underlie widespread characterisations of wildlife trafficking as a benign informal trade in valuable products.[10]

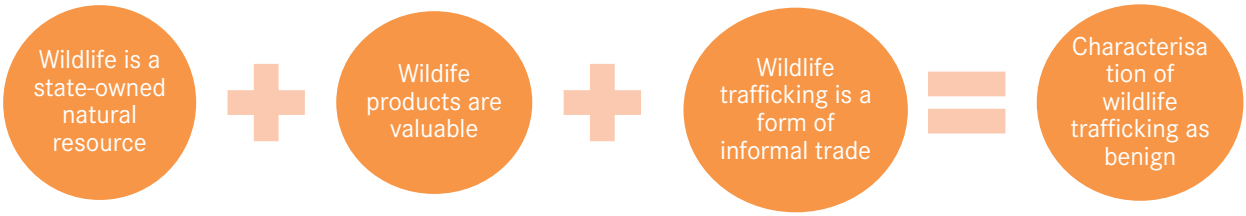



*Figure 3: Beliefs about wildlife and wildlife trafficking*

### 2.3.3 Wildlife trafficking is legitimate

The research evidence suggests that there is a gap between the illegality of wildlife trafficking and its perceived illegitimacy. This gap is illustrated in the responses of the majority of research participants around the wildlife habitat in Northern Uganda, who feel annoyed, offended and irritated when seeing awareness campaigns or other information advocating against wildlife trafficking. For them, the bigger crimes relate to the creation of the wildlife habitat itself. This, they say, has led to the destruction of their traditional heritage, loss of access to ancestral lands and sources of livelihood, and human consequences for those that are arrested and prosecuted for wildlife crimes.

The research participants explain that this habitat in particular previously belonged to their community. It provided a source of income (land, barter and money trade) and food (meat and fish) for the community.

[10] It is important to add that present day characterisations of wildlife and trafficking have historical legacies. A key factor is the colonial legacy of creating enclosures for sport hunting and safaris and removing the right to subsistence hunting by local communities. This is associated with fuelling resistance towards legislation protecting wildlife (Duffy et al., 2016). Such historical legacies lie at the core too of contemporary debates on for instance the role of hunting or tourism as part of wider conservation efforts.

Wildlife products were also used in – and used to finance – social engagements such as weddings and burial or rain-making rituals. No longer having the ability to do this is associated with persistent drought and misfortunes in the region. When the habitat was turned into a protected wildlife area, the people were "robbed of their traditional heritage", land and resources. Financial compensation and tangible developments and outcomes did not transpire. At the same time, those who are caught trying to make a living from the wildlife risk being criminalised and sanctioned.

Therefore, while wildlife trafficking is illegal, it is not considered illegitimate as it is in line with (in the words of one participant) "their ancestral livelihood heritage". One of the reasons the participants suggested that people like the fictitious "Daniel" would accept offers to participate in the illegal trade is because "wildlife trafficking is the only vibrant profit earning enterprise since we were robbed of our ancestral source of livelihood by the government without any compensation" and because it is a "traditional source of livelihood".

Public officials may too hold the view that wildlife crime is illegal but not illegitimate. First, public officials may empathise with the socio-economic factors that drive individuals to engage in wildlife poaching and trafficking. Second, public officials may face social consequences for pursuing actions against those involved in wildlife crime. Social pressures on public officials who are part of the local social fabric (i.e. when they are recruited from the neighbouring communities) can be powerful enough to override the formal rules and regulations (Baez Camargo, Bukuluki, et al., 2017).

A ranger or a local police officer may face severe social backlashes for arresting poachers and small-scale traffickers because their decision places family members of the accused in a precarious financial or social situation, i.e. as a result of fines or jail time. Being embedded in the local social fabric, the social pressures and consequences to act in the "right way" frame upholding the law in such an instance as the real criminal behaviour.

### 2.3.4 Wildlife trafficking is a source of wealth and status

The conversations with the research participants around the wildlife habitat in Northern Uganda illustrate that wildlife trafficking can be viewed as a source of wealth and status. The fictitious "Peter" - who offers "Daniel" an opportunity to get into the wildlife trafficking business with him - is viewed by some in the group as a fortune provider[11] and:

- a responsible community member who cares for the needy;
- a wealthy and generous individual who provides opportunities for community members to improve their living standards;
- a good and generous man since he provides employment for others.

Peter's presumed luxurious livelihood style is a big enticement and one of the reasons why research participants believe that most men and women in Daniel's position would surely take the offer. As explained above, turning down a lucrative offer may therefore result in disappointment, disagreement and ridicule by family and friends.

The conversations with the experts further support this view. Acquiring financial resources through poaching and trafficking is associated with improving one's social status and socio-economic livelihood,

[11] The work of Eric Hobsbawm on "Social Bandits" elaborates that in contexts of weak state power, outlaws engaging in illegal but socially acceptable behaviour may be viewed by ordinary citizens not as simple criminals but as heroes and champions of social justice.

becoming part of the middle class, affording a lavish lifestyle, and becoming a "business man". All of these are socially praised. The evidence of previous research in Uganda (Baez Camargo, Bukuluki, et al., 2017) supports the idea that wealth and status are associated, i.e. "being rich" provides status and respectability. The means by which one becomes wealthy is less important.

The research evidence therefore suggests that it is socially acceptable to engage in wildlife trafficking because it is a legitimate practice and a means of attaining wealth and status.


*Figure 4: Factors influencing the social acceptability of wildlife trafficking*

All the factors above provide a conducive environment and infrastructure for all sorts of illegal activities to take place, including wildlife trafficking. The illicit trade can thrive because in constrained socio-economic and governance contexts, criminal networks can entice both citizens and public officials along key points in the supply chain to support and facilitate their activities. This is reinforced by shared perceptions of wildlife trafficking as benign.

Addressing common beliefs and narratives of wildlife trafficking can provide an entry point to tackle these behavioural drivers. Two observations from the focus group discussions support this hypothesis:

- First, in the fictional scenario of David and Peter, when the group was informed in a later stage of the discussion that the wildlife products involved *come from different animals, such as elephants and rhinos*, some respondents changed their response from acceptance to rejection. The change of response is interesting because it seems that when more information is provided on the origin of the wildlife as opposed to perhaps the less *perceived* risky behaviour of helping load and move products in a box, this seems to elicit a different consideration for some of the participants. Reasons why can be related to the fact that they are more knowledgeable about the consequences of actions related to poaching in contrast with the less clearly illegal actions related to transportation. This suggests that the frame through which wildlife trafficking is presented matter, even in contexts in which wild animals are perceived in a utilitarian manner.
- Second, the conversation also illustrates that in terms of who would have the most influence on "Daniel's" decision to accept or reject the lucrative offer, it was not his own personal opinion as may have been assumed to be the case. The opinion of friends was expected to influence his decision the most. His own personal opinion came second, closely followed by the opinion of family and the community. It is therefore important to target information not just towards

individuals but at the larger community. Equally important is for such messages to outline the hidden costs of the illicit wildlife trade.[12]

# 3 How does wildlife trafficking happen?

This chapter explores the question how wildlife trafficking happens in Uganda by focusing on the role and strategies of informal trafficking networks. It explores the composition and coordination of functions within the networks. It elaborates on the strategies employed to consolidate, conceal and traffic wildlife products into, through and out of Uganda. It examines the role of corruption and in particular the co-optation of public officials and the collusive behaviours that facilitate wildlife trafficking. The chapter concludes by reflecting on Uganda as a "path of least resistance" for wildlife trafficking networks.

The insights contained in this chapter come directly from the interviewees and focus group participants and have not been independently verified. Interestingly, however, they chime with the findings of recent social network analysis on wildlife trafficking networks operating in Uganda, conducted as part of this same research project (Costa, 2020).

## 3.1 Coordination

As explored in the previous section, constrained socio-economic contexts and weak rule of law can generate incentives for diverse groups of people to respond to the demand for wildlife products. Yet while the supply of wildlife products can be established opportunistically from the bottom up, this is not the predominant characterisation of how large volumes of products are sourced in the region. The conversations with the experts suggest that there is a top-down orchestrated and organised supply chain of wildlife products. Four key functional roles are described by the experts that sustain this supply chain in Uganda.

| | |
|---|---|
| **Buyers** | • Located in Kampala and Entebbe.<br>• East African and West African businesspeople engage in regional commercial activities, investing and trading (import and export).<br>• Asian businesspeople: have a similar role to the African buyers or act as the eyes and ears of the big buyers in Asia.<br>• Specialise in the international accumulation of wildlife products (incl. storing, aggregation and concealment). Compete or collaborate with other buyers to orchestrate the supply). |
| **Urban middlemen** | • Located in large towns/urban areas and capital cities, such as Kampala.<br>• West African entrepreneurs: own stores (e.g. second-hand shops) and engage in a range of business/trading activities.<br>• Ugandan nationals: strong social capital and knowledge of local context, with ability to broker connections with the right people. |

[12] Outlining hidden costs of engaging in illicit behaviour can challenge commonly held beliefs and wisdoms associated with it (Stahl et al., 2017).

| | |
|---|---|
| | • Specialise in the regional accumulation of wildlife products. Connect the suppliers and buyers of wildlife products. Connect with local middlemen and other urban middlemen to orchestrate the supply. |
| Local middlemen | • Located near wildlife habitats (village, market, trading centre or nearby border town).<br>• Strong social capital and knowledge of the local context.<br>• Connect with poachers and other local middlemen.<br>• Specialise in the local accumulation of wildlife products, including storing, aggregation and concealment. |
| Poachers | • Located near wildlife habitats.<br>• Source large volumes of wildlife products from wildlife habitat, including long and coordinated hunts in groups. |

*Figure 5: Functional roles in wildlife trafficking networks*

The research suggests that these functional roles may look different according to each context. The number of network members, their relative roles, the nature of the collaboration, the relative distance between the network members and their physical bases can all differ.

While at its higher echelons there is a need to develop long-term relationships of trust, as one moves to the grassroots the criminal networks can rely on a large supply of willing accomplices to support their operations. These "foot soldiers" can be provided with the right training and equipment to ensure a successful hunt.

> *"Poachers are the foot soldiers. They are not interesting, they are not players. The ability to hunt is not limiting the actual hunting. It is the empire that is built above it. The empire can hire any person with such skills."*

> *"It is a top down networking. The people in the bottom tier are expendable, you can replace them."*

The conversations with the experts suggest that this fluid shape and dynamic structure of the network is the backbone of a strategic infrastructure of cooperation that facilitates wildlife trafficking.

## 3.2 Consolidation and concealment

### 3.2.1 Entering Uganda via official/unofficial border crossings

The experts shed light on some of the strategies used to move wildlife products from "park to port". These strategies relate to the entry and exit of one of the most trafficked wildlife products through Uganda, namely ivory.

Ivory that is trafficked through Uganda can come from a multitude of countries, according to the experts. It is sourced from and transported through countries including Burundi, Mozambique, Tanzania, Central African Republic, the Democratic Republic of the Congo, South Sudan and Kenya. Wildlife products that enter Uganda via a neighbouring country may in fact have been sourced somewhere else.

Wildlife products such as ivory can enter Uganda via unofficial border crossings.[13] They are consolidated, concealed and transported on foot or with small vehicles or motorcycles to a border town. They are thereafter consolidated again and transported on vehicles to Kampala. For example, traditional hunters can opportunistically offer irregular or regular small volumes of wildlife products to a local middleman. A conversation with a member of the reformed poachers' network in Western Uganda gives a deeper insight into this mechanism. He shares that he used to participate in poaching elephants and that he would sell the tusks to a local buyer in Rwanda and the meat to a local buyer in the Democratic Republic of the Congo.

Wildlife products can enter Uganda through official border crossings too. They are consolidated, concealed and transported on various kinds of vehicles, such as buses, cars, vans, boats or commercial and military trucks, to Kampala. The strategies differ depending on what type of actor sources the wildlife products and where the poachers and local and urban middlemen are based.

### 3.2.2 Consolidation and concealment in Kampala

The experts suggest that wildlife products are predominantly consolidated in Kampala by the buyers. This includes both the regional and national supply of various wildlife products, for instance ivory from outside of Uganda and pangolin scales from wildlife habitats within Uganda.

The wildlife products are stored in business and private premises around Kampala and Entebbe. In some cases, the products are consolidated, concealed and packaged in preparation for intercontinental transport. Alternatively, the previous consolidation remains in place and the products are stored in preparation for the next step.

The research participants shared a wide range of methods employed to conceal ivory tusks. The insights from the research suggests that the level of sophistication increases when the volumes of products that require concealing increases. The participants identified the following concealment strategies:

- Hiding ivory in agricultural products (e.g. potatoes, bananas, fish, grains, beans, tea, coffee, butter).
- Hiding ivory in vehicles (e.g. fuel tankers or military trucks).
- Hiding ivory in other products (e.g. scrap metal, plastics or belts).
- Mixing ivory with minerals (e.g. rough or semi-precious stones).
- Mixing ivory with licit wildlife products (e.g. timber).
- Reconstituting ivory by:
    - carving or moulding it (e.g. into keychains, chopsticks, beads or coffins).
    - slicing it thinly and hiding it in clothing products.

Crucially, the concealment method fits the licit business framework that provides the cover for the regional and international transport. For instance, trucks with timber cross the DRC-Uganda border frequently. This could provide an opportunity for a particular concealment strategy (e.g. hiding ivory in hollowed-out logs) because this kind of transport is typical and does not raise suspicions.

The nature of the strategy also fits the type of wildlife product that is trafficked. Live, dead or processed animal products may all be stored and moved differently. In the context of ivory, it is a non-perishable

[13] This is referred to as ant-trade strategies (Titeca, 2019).

product that can be reconstituted in many ways. This opens up a vast spectrum of methods that can be employed to facilitate the movement from parks to port.

### 3.2.3 From Kampala to port: exiting via road or air

The experts suggest that one of the main modalities of trafficking large volumes of illicit products out of Uganda is the export clearance system for cargo in Uganda. After clearance, wildlife products can exit Uganda through its main airport (Entebbe) or through other ports and airports in East Africa. The research participants explain the various strategies that are used to transport wildlife products through Entebbe Airport:

- Cargo can be loaded onto commercial aircraft. Using small regional airlines or larger airlines that depart in the middle of the night helps reduce the risks of detection of concealed wildlife products.
- Cargo can be loaded onto (cargo) aircraft that depart from the United Nations base at Entebbe Airport. According to the experts there are not "many checks and controls here". Another avenue is that the trafficking networks find ways to enter and transport the wildlife products through the cargo centre of the airport.

The experts explain another exit strategy, namely transporting the wildlife products to and through Mombasa seaport. In the words of one research participant, "Kenyan customs will not touch Ugandan cargo". In addition to its benefits in facilitating regional trade, the East African Community Customs Union[14] provides an infrastructure that enables traffickers to avoid customs checks.

Cargo can be placed on trucks and transported by road to Kenya:

- On a truck from Kampala to Nairobi, then on a train from Nairobi to Mombasa.
- On a truck from Kampala to Mombasa. In Mombasa, the cargo is loaded onto container ships en route to the final destination country.

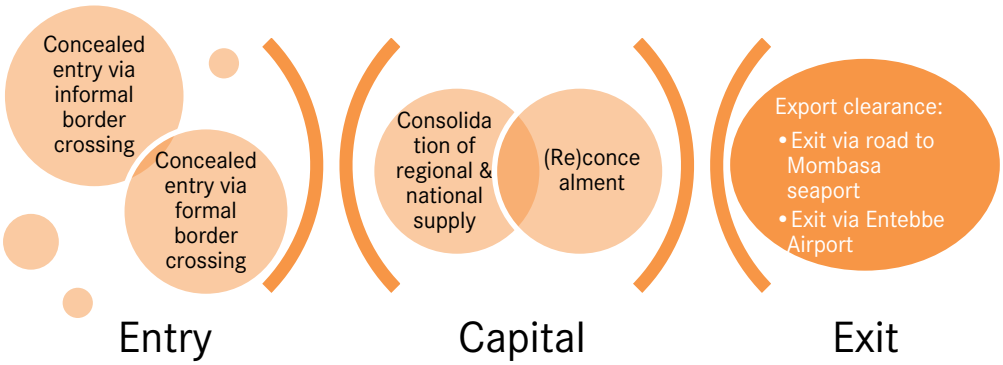



*Figure 6: Strategies to traffic wildlife products into, through and out of Uganda (I)*

[14] "The Customs Union is the first Regional Integration milestone and critical foundation of the East African Community (EAC), which has been in force since 2005, as defined in Article 75 of the Treaty for the Establishment of the East African Community. It means that the EAC Partner States have agreed to establish free trade (or zero duty imposed) on goods and services amongst themselves and agreed on a common external tariff (CET), whereby imports from countries outside the EAC zone are subjected to the same tariff when sold to any EAC Partner State. Goods moving freely within the EAC must comply with the EAC Rules of Origin and with certain provisions of the Protocol for the Establishment of the East African Community Customs Union." https://eac.int/integration-pillars/customs-union

The conversations with the IWT experts reveal that for wildlife products to move from Kampala to and through any port out of East Africa, it is crucial to develop informal relationships with members of the private sector.

The conversations with the experts highlight in particular the importance and role of customs clearing agents and freight forwarders that specialise in international transportation. These individuals are often based in cities and airport areas in Uganda (namely Kampala and Entebbe). Buyers aim to develop strategic relationships with these clearing agents and freight forwarders to arrange the intra- and intercontinental transportation of illicit wildlife products.

> *"These big buyers – who export the goods outside Uganda – have trusted clearing agents who manage the transaction at the borders, such as airports or land borders. These clearing agents are well connected individuals, who are able to build social relations with security firms, border patrols, policemen, soldiers, intelligence agents. Thanks to the activities of these clearing agents, these "security officials" don't ask questions, don't ask anything, and don't check the shipment and the goods that are delivered. (..)"*

> *"Often, the clearing agents get the products from the stores of the traffickers, transport them to the exit points, and facilitate the clearing of these products at the exit point."*

Individuals working for clearing agents and freight forwarding companies can be proactively targeted by criminal networks because their position in the company allows them to facilitate wildlife trafficking. Not only is their position in the company useful to the traffickers. They are also highly knowledgeable about the rules and loopholes, for instance about which type of product is fast-tracked and others that arouse more suspicion. Since they often have a background and former role in customs authorities, this gives such agents a unique set of knowledge and skills.

One expert shares that this co-optation is done very methodically. The individuals are observed (for instance when working at the port) and then reached out to with an offer to "do business together". Money is offered in return for facilitating a "licit" trade. In the first few instances, the agents do not know they are facilitating illicit transport. After trust is built, they are informed that the boxes contain illicit goods. They are often told right before or after the goods are being transported out.

This is a strategic process that starts off small and is built up over time. Once co-opted, individuals and/or companies knowledgeable about the illicit content of the cargo can create the right documents to cover this up.

> *"Clearing agents: they clear the problems, they act as they know. (..). For example, a clearing agent in Entebbe manufactures a document that has a fake destination. Then when the goods are loaded into the cargo, there is another member of their staff, the ramp handler, that then takes care of the loading of the goods and prepares the correct documentation with the correct destination."*

Other important private-sector actors are banks and other financial institutions.[15] The experts suggest that in particular foreign exchange bureaux are major conduits for the proceeds of the trade. Frequently, converting small amounts of foreign exchange is an easy way of avoiding suspicion. More systematic is the co-optation of the bureau's management. Cutting them a deal ensures that no investigations are started on their accounts.

> *"One factor to use them is determined by the legal and law structure in Uganda: it is easy to use them to move money, and you can deposit and transfer money (also big quantity) without raising too many questions. Forex offices don't ask anything. They also offer better conditions for the transaction."*

The connection between buyers and these entities is absolutely crucial. For this reason, the experts share that these relationships are strategically developed and built up over time.

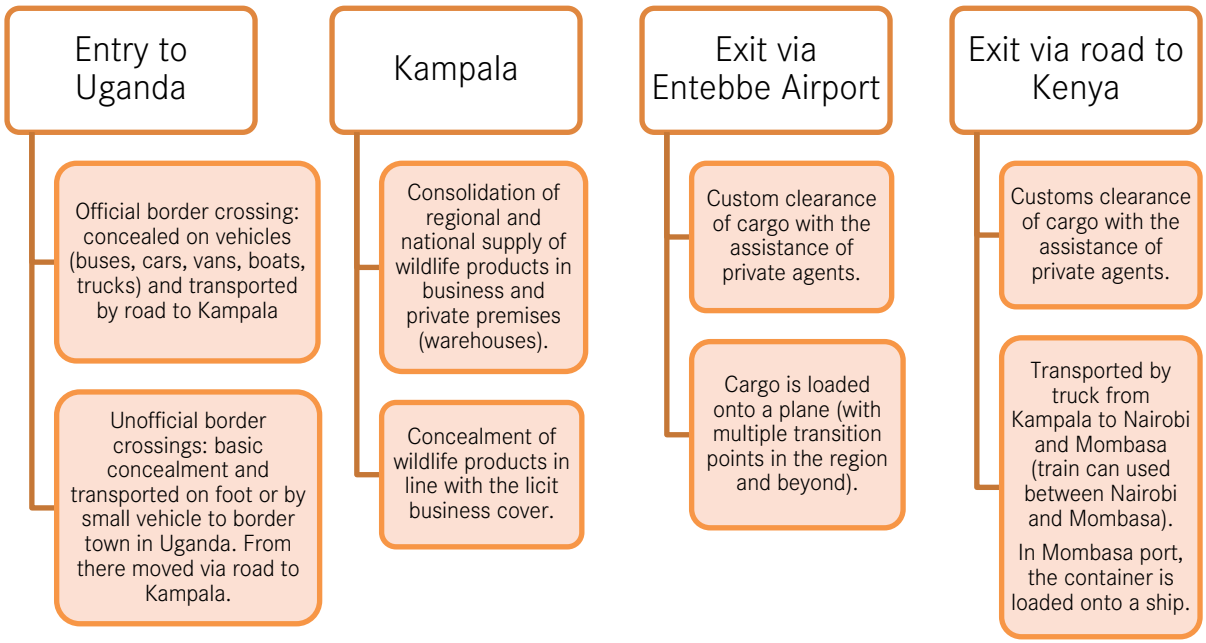



*Figure 7: Strategies to traffic wildlife products into, through and out of Uganda (II)*

The conversations with the interviewees suggest that the attractiveness of particular routes is not static but can change depending on the various circumstances. One major contributor to this is when high-level seizures and arrests take place in a particular port, country or region. This can provide the impetus to adapt their strategies, find new routings, use different points of exits and establish a new set of collusive connections to facilitate these endeavours.

[15] Hawala, Western union; MPSA, Money gram, Amal express, Flying money, Islamic banking. The experts explain that financial transaction can be avoided through bartering. Members of the network can be paid with agricultural products (rice, maize, and livestock) or more valuable items such as clothes, electronic products, cars and real-estate. Financial institutions can also be avoided by making use of cash payments and storing money at home.

## 3.3 Corruption: co-optation and collusion

In a context in which corruption is normalised, offering a bribe is a relatively easy strategy to circumvent measures in place to prevent and combat wildlife trafficking in Uganda. The most typical example of this is at the earliest stages of the supply chain, for instance, when public officials are offered financial compensation to facilitate the unhindered transport of wildlife products past their border post or out of the wildlife enclosure.

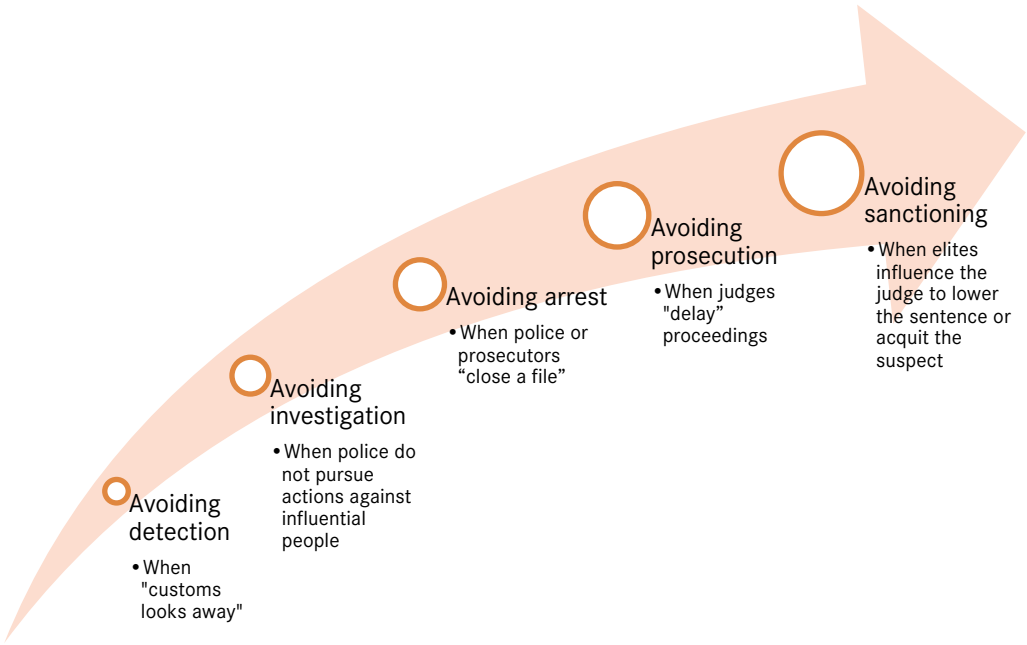
The conversations with members of the reformed poachers' network in Western Uganda lift the veil on the myriad ways in which corruption undermines the law enforcement chain at the earliest stages of wildlife trafficking.

- One of the members shared that when he or his colleagues were caught and arrested carrying wildlife products out of the park, they would inform both their customers (local middleman) and the local politicians (area councillors or member of parliament). The local politician would go to the police station and pay the officers money to have them released from custody.
- Another member shared that when a colleague (fellow poacher) was caught by rangers and handed over to the police, they would actually continue poaching and selling the wildlife products until they had enough money to bribe the police officer. They would pay the equivalent of less than USD 50 for the charges to be dropped.
- Another former poacher shared that when he was caught, he was asked to pay a fine of around USD 400 to the police in the presence of the rangers. However, this "fine" is more than likely a cover for a bribe because he was never issued with a receipt and on-the-spot fines are not in line with formal procedures. This indicates that the fine may have been pocketed by the police and rangers.

These three very basic and real-life examples shared by the research participants show how different forms of corruption can render the legal framework in place against wildlife trafficking ineffective.

Nevertheless, the conversations with the experts suggest that the co-optation of public officials is not just a one-off problem-solving strategy for ensuring, for example, that charges against poachers are dropped. Public officials are not only bribed when the network hits a snag in its operations, but are pro-actively co-opted to prevent the law enforcement chain from being activated in the first place. The research evidence suggests that this strategy – alongside elaborate concealment - facilitates the unhindered trafficking of large volumes of wildlife products into, through and out of Uganda.

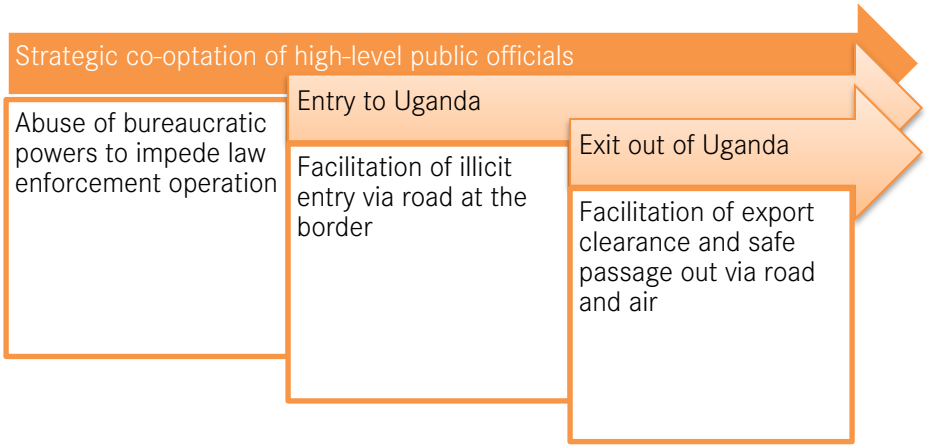
Strategically targeting and co-opting key public officials through bribes is an effort to undermine important enforcement measures in place to fight wildlife trafficking. The law enforcement system offers many entry points to opportunistically corrupt public officials and thereby cripple its operation along the trafficking route. See Annex 2 for more examples of how corruption may undercut law enforcement along the trafficking route.




In order to accomplish this, urban middlemen and buyers develop relationships with a different calibre of public officials, namely political elites and high-level public officials. It is important to emphasise that the networks are not undermining an otherwise stable system. Instead, they are capitalising on a governance context with high levels of corruption that makes it vulnerable to illegal activities.

These officials and elites are identified as having power, clout and influence, not only within their own office but across the wider government bureaucracy. They are part of the social infrastructure of the trafficking networks. They may receive financial gifts or other valuable items, such as cars or real estate.

A number of experts suggest that "untouchables, godfathers and top shots" aid the trafficking networks in navigating the most difficult part of their operation, namely the successful transport of large volumes of wildlife products out of Uganda. Their assistance is crucial because the research evidence suggests that the trafficking networks clear the cargo for export in Uganda. These elites therefore undermine a crucial first step to combating wildlife trafficking, namely its *detection*. Without detection, there is no investigation, arrest, prosecution or sanctioning.




Not only do these political elites and high-level public officials render the detection of wildlife products at the exit stage ineffective, this also applies to the process of entry and consolidation in the urban areas.

Through the connections these actors hold, they are able to influence and straddle many spheres of public power. The manager of a customs post at the border can instruct an official to step away for a moment from their post (e.g. when trucks of associates are passing through). This manager may not even be acting on his or her own account, but may have received this instruction from their superior.

An illustrative example of the ways in which bureaucratic influence is exerted across different spheres of public office is the alleged trafficking of wildlife products by the Ugandan Army. Military troops have been accused of poaching elephants in Garamba National Park in the DRC and abusing military resources to transport these products across the border (Cakaj & Lezhnev, 2017). Key here is that border officials would not stop to check a military convoy.

A more recent example is the capture and extradition of trafficker Moazu Kromah, who was arrested for large-scale trafficking of rhinoceros horn, elephant ivory and heroin in 2019. The experts explain that he was arrested several times before this, but that he could evade justice "because it was a matter of corruption of police or judges".

The strategic co-optation of these powerful actors is crucial to the successful trafficking of wildlife products out of Uganda. One expert explains this as follows:

> *"Senior officials in security circles and airport staff are involved. They arrange for the movement and passage of these products into the aircraft, facilitating the smuggling out of the country. The senior officials know when accomplices are on duty at the various check points of the border crossings and airports and take advantage of such moments to move the products though these key points."*

The influence that these elites command is significant. The experts explain that a customs/border official who detects the presence of wildlife products may not touch this transport simply because they know the "godfather" or "bosses" that are involved and are aiding this process. They let the goods pass because of fear of losing their job or the physical violence that may result from "wrong" behaviour. The repercussion may be professional (i.e. demotion) or personal. One expert notes the consequences as follows:

> *"If you refuse, you will receive a call from your boss who intimidates you to act as requested. If you continue to resist, they move you to another office, or they threaten you, or they create bad consequences for your career."*

This impacts the entire law enforcement chain, including border police, wildlife authority staff, customs officials, prosecutors and judges. All these may decide to not go after powerful individuals or those "connected" to important political actors. These may be individuals, private companies (e.g. clearing and freight forwarding companies) or other public officials who are associated with powerful political actors. It is why one expert notes that even the most committed and upright law enforcement official would fear the people that have such political connections and not dare to go after them.

This strategic relationship between "untouchables, godfathers and top shots" and the trafficking networks is closely associated with the clientelist nature of the Ugandan political system. On the one hand it is associated with the normalisation of exploitation of public office. On the other, it relates to the fact that illicit economies provide opportunities to extract the resources necessary to maintain current and future support for the political system, while at the same time securing the individual careers of the elites.

This infrastructure of support for corrupt public officials hides behind a veil of a functioning bureaucracy where rules and regulations are in place but rendered ineffective at the same time. One expert notes that this "support" of complicit public officials erodes justice systems and as such every Ugandan citizen can be considered a victim.

## 3.4 Uganda: the path of least resistance

In a context of widespread corruption and impunity in Uganda, the duties of public office provide little to no constraints and therefore public officials can easily be co-opted by wildlife trafficking networks. The strategic co-optation of high-level public officials in key points along the trafficking route makes Uganda, in the words of the experts, "the path of least resistance". The networks have established a "demarcation of a way out to move the goods" that evades the law enforcement framework in place. In the words of one participant: "getting out of Uganda just requires corruption".

By bribing and co-opting public officials in their networks, the trafficking networks are able to undermine the system and remove threats and bottlenecks to their operations. In some cases, public officials not only facilitate the trafficking networks but take on active functional roles as poachers and local and urban middlemen. At its lower echelons, the networks can rely on a steady stream of willing accomplices looking for quick financial gains to overcome constrained socio-economic contexts.

The modus operandi of the networks is equally opportunistic.

- Trafficking latches onto the formal trade infrastructure in place in Uganda, including the formal regional trade agreements and physical transport infrastructure.
- Trafficking is covered up by the presence of large foreign licit commercial (business and trade) activities in Uganda. Engaging in cash-intensive sectors is a particularly opportunistic way to justify the possession of large sums of money and at the same time offers the opportunity to launder the proceeds of illicit gains into legal profits. Business premises also provide an ideal space to consolidate wildlife products.
- The profits are hidden in weakly regulated banking and financial institutions that ask few questions.

This, claim the interviewees, makes Uganda "the path of least resistance" and an ideal environment for wildlife trafficking to flourish.

# 4 Conclusion

Turning wildlife trafficking into a "high-risk, low-profit" trade is challenging. This research on why and how wildlife trafficking happens in Uganda gives some insights into the breeding ground that sustains the supply of large volumes of wildlife products moving from wildlife habitats in East Africa to the hands of consumers all over the world.

The research shows that structural drivers of weak governance systems and constrained socio-economic contexts provide the macro-level conditions for all sorts of illegal activities, including wildlife trafficking, to flourish in Uganda. Programmes to curtail wildlife trafficking should therefore also consider, account for and address the underlying structural foundations of high levels of poverty and corruption that provide

a conducive environment for illicit activities and economies. They can build on lessons learned in a variety of areas:

- In developing strong governance systems in public offices in Uganda through the "islands of integrity" approach. Even in highly corrupt environments, there can be public institutions that are successful at reducing corruption.[16] If programmes could be developed such that investing in preserving the wildlife habitats and the wildlife itself could be aligned with government priorities, this could provide entry points to better conservation in parks.

- From addressing the functionality of corruption[17] and the role of illicit economies for political elites in maintaining political power. For instance, by capitalising on political windows of opportunity that may provide entry points for shifts in tone, action and approaches of the government to fight wildlife trafficking. There is the potential to frame the issue in the context of key developmental priorities such as the economy, social welfare, corruption and financial crime, natural resource management, environment and peace and security.

- From the development of alternative economic opportunities[18] that make it less attractive for individuals to support wildlife trafficking. In other words, by providing alternative sources of livelihood or income-generating activities associated with wildlife habitats and learning from successful conservation efforts that have high levels of community support around them.[19]

- From information or edutainment campaigns[20] designed to challenge conventional wisdom. Public awareness campaigns could disseminate stories and illustrative examples that challenge prevailing beliefs about wildlife and make it less socially acceptable to support wildlife trafficking. The messages could potentially be reinforced through positive role models.

Holistic approaches that tackle both the supply and demand for wildlife products are important. Equally important is to put the spotlight not only on poachers but on the organised criminal networks above them and equally the consumers of wildlife products at the end stage of this illicit market.

As part of a holistic approach, it is crucial to not only focus on punishment but also prevention. Programmes should consider the drivers, facilitators and functionality of participating in wildlife trafficking.

---

[16] See here for an example of how bribery reduced in Uganda's health sector between 2011 and 2015 https://policybristol.blogs.bris.ac.uk/2019/03/13/what-we-found-out-about-bribery-patterns-in-ugandas-health-care-system and in Uganda's tax services between 2010 and 2014 https://tikenya.org/wp-content/uploads/2017/08/TI-Kenya_The-East-African-Bribery-Trends-Analysis_2010-2014.pdf .

[17] See here for an example on how to counter informal governance regimes that generate corruption. https://www.baselgovernance.org/public-governance/research-projects/informal-governance/practical-implications and how to harness informality and informal governance networks for anti-corruption. https://ace.globalintegrity.org/projects/informality/

[18] See here for an example of a project supported by the Uganda Wildlife Authority in Buhoma-Bwindi Impenetrable Forest National Park where traditional hunters are supported in taking on more sustainable income generating activities. https://bwindidevelopmentnetwork.org/reformed-poacher/

[19] See here for an example on how community development can be an integral aspect of park management in Liwonde National Park in Malawi. https://www.africanparks.org/the-parks/liwonde

[20] See here for an example of the work of TRAFFIC using social and behavioural change communications to reduce the motivations for the consumptions of illegal wildlife products. https://www.traffic.org/what-we-do/projects-and-approaches/behavioural-change/. See here for another example of a behavioural intervention to reduce petty corruption in the health sector in Tanzania. https://ace.globalintegrity.org/projects/tanzhealth/

Moreover, it is essential that high levels of political support and strong (regional) collaborative law enforcement measures[21] converge with conservation efforts at the grassroots level. This should translate into tangible improvements in the lives and livelihoods of those living near wildlife habitats.

All of this would contribute to Uganda becoming the path of most resistance for wildlife trafficking.

[21] Strengthening anti-IWT investigation and prosecution units with the necessary training and facilitation, alongside regional and international co-operation initiatives to combat IWT.

# Annex 1: Research methodology

This research builds further on a 2019 working paper on corruption and wildlife trafficking that explores the drivers, facilitators and networks behind illegal wildlife trade in East Africa (Kassa et al. 2019). It aims to unpack in more depth how local social norms, community attitudes and contexts, as well as informal social networks and their associated corrupt practices, play an important role in driving and facilitating wildlife trafficking.

A focus on Uganda was adopted because of its infamous role as a "transit country" through which high volumes of wildlife products are trafficked. This more detailed and in-depth exploration in Uganda provides an opportunity to bring to the fore local and contextual insights that shape and influence illicit wildlife trafficking. Based on these, it is then possible to develop context-sensitive recommendations on how to curb this illegal activity.

The objective of the research was two-fold:

- To understand why wildlife trafficking happens by focusing on the economic and behavioural drivers of wildlife trafficking and the role of the broader governance environment in generating corruption risks in public offices mandated to prevent and combat wildlife trafficking.
- To understand how wildlife trafficking happens by focusing on the role of and strategies employed by informal networks of poachers, middlemen and buyers to transport high volumes of wildlife products into, through and out of Uganda.

Due to the illicit and covert nature of wildlife trafficking, it was crucial to take a bottom-up approach and engage local stakeholders that could speak about this topic and share their perspectives, insights and knowledge. As the research topic is multifaceted, it similarly required that the research engaged with various stakeholder groups that could shed light on different angles and aspects of the issues at hand.

The research therefore adopted a worm's-eye approach by engaging in conversations with local and international anti-IWT experts as well as former poachers and individuals living near wildlife habitats that could share their perspectives, insights and knowledge on why and how wildlife trafficking happens in Uganda. A particular focus was placed on ivory, one of the most frequently trafficked wildlife products through Uganda. Eliciting both expert and citizen perspectives on the drivers of illicit wildlife trafficking was important to garner a more comprehensive understanding of this issue, considering the different vantage points of societal stakeholders.

The aim of these interviews and focus group discussions was not to generate national or regional representative insights on drivers of wildlife trafficking. Rather, the aims were to bring together insights from different societal stakeholder groups and to arrive at *general patterns and trends that help explain why and how wildlife trafficking happens in Uganda*. This approach was particularly useful because literature on the drivers of wildlife trafficking across Uganda is scarce and rarely considers a wide range of local perspectives and insights on this issue. This approach provided an opportunity to arrive at broad characterisations and contribution to theory on the drivers of wildlife trafficking and developing context-sensitive approaches to fight it.

The exploratory nature of the study drove the participant selection logic of the research. This was based on purposeful sampling (as opposed to random sampling) with the aim of eliciting the insights of key stakeholders in the fight against trafficking and that were interested in contributing to this research.

Based on the literature review and an internet search, a list of key stakeholders who work in the field of preventing and combatting wildlife trafficking in Uganda was prepared. All the organisations on the list were approached to participate in this research and others were identified through a snowball technique. Local leaders living near wildlife habitats in Western and Northern Uganda where focus group discussions were planned helped with identifying those individuals that would be interested in participating in the research. The main aim was to ensure that there would be a balanced contribution of different key stakeholder groups in the research.

The research combined two qualitative methods of data collection, namely interviews and focus group discussions.

- 47 semi-structured interviews with Ugandan-based and international anti-IWT experts were conducted (NGOs/IGOs (25), academia (12) and public officials (10)). The interviews were conducted in person and virtually between August 2019- February 2020.
    - Themes discussed include: facilitators of wildlife trafficking, including the formal legal framework and the broader socio-economic context; the role of social norms and community attitudes as drivers of wildlife trafficking; corruption as a driver and facilitator of wildlife trafficking; the structure, functions and operations of trafficking networks in Uganda.
- 2 focus group discussions were conducted with in total 13 wildlife conservation and anti-corruption experts in Kampala, Uganda. The focus group discussions were conducted between October-November 2019.
    - Themes discussed include: drivers to participate in wildlife trafficking, including economic motivations, the role of social pressures and community attitudes; the role of corruption as a driver and facilitator of wildlife trafficking and the role of corruption in the broader political system.
- 2 focus group discussions were conducted with in total 17 members of reformed poachers' networks around two national parks in Western Uganda. The discussions were conducted in November 2019. The exact location of the wildlife habitats is anonymised to protect the identity of the focus group discussion participants.
    - Themes discussed include: economic and social circumstances that drove them to engage in poaching; perceptions of wildlife and trafficking; motivations to stop poaching; and the role of information and community awareness in reducing the social acceptability of poaching and trafficking.
- 4 focus group discussions were conducted with in total 28 individuals (23 men and 5 women) living around (and with knowledge on poaching and wildlife trafficking) a wildlife habitat in Northern Uganda. The discussions were conducted in April 2020. The exact location of the wildlife habitat is anonymised to protect the identity of the focus group discussion participants.
    - Themes discussed include: discussing a hypothetical scenario of an offer to participate in wildlife trafficking and motivations to accept or refuse this; and eliciting more general beliefs about wildlife and trafficking.

Informed consent was obtained from all research participants. Strict procedures were also in place to maintain anonymity and confidentially. The findings from the interviews and focus group discussions were triangulated and analysed through a "grounded-theory approach" allowing for the emergence of patterns within the data (Glaser & Strauss, 1967) on why and how wildlife trafficking happens in Uganda. These main insights are elaborated in this research report.

# Annex II: Examples of corruption that may undermine efforts to prevent and combat wildlife trafficking in Uganda

The below table summarises examples provided by the experts on the myriad ways in which corruption can undermine the formal legal framework in place to prevent and combat wildlife trafficking in Uganda. It is important to note that none of these have been verified independently and no claim is made as to their veracity. The aim is merely to underscore that corruption can through many ways rear its head in fighting wildlife trafficking – at different stages of the supply chain, involving different public officials and offices, and through different forms of connivances. The outcome is the same: undermining the formal legal framework in place to curb wildlife trafficking.

*Table 1: Examples of corruption that may undermine the prevention and combatting of wildlife trafficking in Uganda*

| | Park | City | Port |
|---|---|---|---|
| **Low-level public official**<br><br>**Passive facilitation** | - Ranger turns blind eye to poaching in park/absents themselves<br>- Customs official receives bribe to let goods pass at border<br>- Border official receives order from manager to step away from post<br>- Police officer receives gift/tip to stop investigation of poaching/trafficking and/or leverages investigation for gift | - Police officer leverages seized wildlife products for bribe and/or sells it on to a buyer<br>- Citizenship and immigration control provide residence ID/passport to ineligible individuals | - Customs official/revenue authority "clears" prohibited goods and/or allows unauthorised use of diplomatic immunity |
| **Low-level public official**<br><br>**Active facilitation** | - Local councillor orders poaching of wildlife<br>- Ranger gives information to poachers on where to find wildlife/ranger routes and/or gets involved in poaching to complement salary | - Confiscated wildlife products are "lost" from government depot<br>- Customs officials doctor export permits for known illicit trader | - Aviation authority staff adjusts seals of cargo containing wildlife products<br>- Undue access is provided to the United Nations base or cargo centre at Entebbe airport |
| **High-level public official**<br><br>**Passive facilitation** | - District official informally approves of poaching wildlife (playing on norms/dissatisfaction with park rules of people)<br>- Judge delays court hearing on small trafficker/poacher and/or reduces sentence for bribe or goes only after unconnected people | - Public prosecutor refuses to go after "untouchables" due to fear of repercussions<br>- Judge receives phone call/assets to rule favourably for friend/sets bail that can be paid<br>- Police chief demotes officer who arrests an associate trafficker | - Clearing agents and freight forwarding companies associated with political elites are used to transport wildlife products<br>- Top public official instructs customs officials to look away<br>- Internal security organisation does not act on red flags for trafficking |
| **High-level public official**<br><br>**Active facilitation** | - Military personal involved in poaching<br>- Use of military material to transport wildlife from park to city<br>- Relatives of local county assemble member engage in poaching and small-scale trafficking | - Judge leverages favourable ruling in exchange for a "gift"<br>- Prosecutors direct police to conduct "further inquiries" which they know will not be fruitful and order the suspects to be released on police bond knowing that they are going to flee<br>- Prosecutors order the return of IWT exhibits to suspects in a suspicious manner, whether on closure of the police file or after the case "collapses" in court | - High-level military personnel involved in wildlife trafficking<br>- Civil aviation authority allows clearing agent to load goods directly onto plane on the tarmac |

# Bibliography

Baez Camargo, C., Bukuluki, P., Lugolobi, R., Stahl, C. & Kassa, S. (2017) Behavioural influences on attitudes towards petty corruption. A study of social norms and mental models in Uganda. Available from: <https://www.baselgovernance.org/publications/studies>.

Baez Camargo, C., Gatwa, T., Dufikumutiza, A., Stahl, C. & Kassa, S. (2017) Behavioural influences on attitudes towards petty corruption. A study of social norms, automatic thinkins and mental models in Rwanda. Available from: <https://www.baselgovernance.org/publications>.

Cakaj, L. & Lezhnev, S. (2017) *Deadly Profits: Illegal Wildlife Trafficking through Uganda and South Sudan*. The Enough Project. Available from: <https://enoughproject.org/reports/deadly-profits-illegal-wildlife-trafficking> [Accessed 12 June 2019].

Costa, J. (2020) (Forthcoming) *Social Network Analysis of transnational illicit trade along East Africa and Southeast Asia*. Basel, Basel Institute on Governance. Available from: <https://baselgovernance.org/publications>

CPI (2019) Corruptions Perceptions Index 2019 for Uganda [Internet]. Available from: <https://www.transparency.org/en/cpi/2019/uga> [Accessed 25 June 2020].

Duffy, R., John, F.A.V.S., Büscher, B. & Brockington, D. (2016) Toward a new understanding of the links between poverty and illegal wildlife hunting. *Conservation Biology*, 30 (1), pp.14–22.

Glaser, B.G. & Strauss, A.L. (1967) *The Discovery of Grounded Theory: Strategies for Qualitative Research*. New York, Aldine.

Golooba-Mutebi, F. (2018) Informal Governance and Corruption – Transcending the Principal Agent and Collective Action Paradigms Uganda Country Report. Available from: <https://www.baselgovernance.org/publications/informal-governance-and-corruption-transcending-principal-agent-and-collective-0>.

Harrison, M., Roe, D., Mwedde, G., Travers, H., Plumptre, A., Rwetsiba, A. & Milner-Gulland, E.J. (2015) *Wildlife crime: a review of the evidence on drivers and impacts in Uganda*. London, International Institute for Environment and Development. Available from: <https://pubs.iied.org/17576IIED/> [Accessed 12 June 2019].

Kassa, S., Costa, J. & Camargo, C.B. (2019) *Corruption and wildlife trafficking: exploring drivers, facilitators and networks behind illegal wildlife trade in East Africa*. Basel, Basel Institute on Governance.

Stahl, C., Kassa, S. & Baez-Camargo, C. (2017) *Drivers of Petty Corruption and Anti-Corruption Interventions in the Developing World - A semi-Systematic Review*. Basel, Basel Institute on Governance. Available from: <https://www.baselgovernance.org/publications/3623> [Accessed 25 August 2017].

Titeca, K. (2019) Illegal Ivory Trade as Transnational Organized Crime? an Empirical Study Into Ivory Traders in Uganda. *The British Journal of Criminology*, 59 (1), pp.24–44.

Titeca, K. & Célestin, K. (2012) *Walking in the dark: informal cross-border trade in the great lakes region*. International Alert. Available from: <http://hdl.handle.net/1854/LU-4161492> [Accessed 19 May 2020].

Uganda Bureau of Statistics (2017) *National Governance, Peace and Security Survey*. Kampala, Uganda.

WGI (2019) WGI 2019 Interactive > Interactive Data Access [Internet]. Available from: <http://info.worldbank.org/governance/wgi/Home/Reports> [Accessed 25 June 2020].

Williams, D.A., Parry-Jones, R. & Roe, D. (2016) The resource bites back: Entry-points for addressing corruption in wildlife crime. *U4 Issue*, 2016:2. Available from: <https://www.cmi.no/publications/5987-the-resource-bites-back> [Accessed 17 June 2019].

World Bank (2016) Uganda Poverty Assessment 2016: Fact Sheet [Internet]. Available from: <https://www.worldbank.org/en/country/uganda/brief/uganda-poverty-assessment-2016-fact-sheet> [Accessed 25 June 2020].

World Bank (2015) *World Development Report 2015: Mind, Society, and Behavior*. Available from: <http://www.worldbank.org/en/publication/wdr2015>.