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Accessing, harvesting and trading in wildlife: Corruption in the use of permits and allocation of access rights

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Key takeaways

» Legal harvest or trade in wildlife, fisheries and forest products typically involves obtaining access rights and permits.

» Corruption in these processes undermines regulations that promote sustainability and legality and address disease risk. Revenue is lost which should have been invested in public services and conservation.

» Strategies to address abuse of these processes include a range of regulatory and administrative reforms, but implementation is not a simple matter of increasing employee pay or cutting bureaucratic red tape. Recognizing and mapping the political, economic and social power dynamics that shape regulations and enforcement may indicate larger problems in the enabling environment that should inform strategies for addressing corruption risks in wildlife harvest and trade.

» The Covid-19 pandemic is likely to reduce already limited budgets: ensuring anti-corruption measures are practical, effective, and funded sustainably is even more critical at this time.

The challenge

Governments commonly act as the "gate-keeper" responsible for managing the exploitation of and trade in wildlife including forestry and fisheries. Companies, communities, individuals, and others who wish to access, harvest or trade wildlife must obtain the necessary rights and permits. The significant revenue generated, combined with the discretionary power often afforded to government employees makes this sector highly vulnerable to corruption by those with power and those wishing to exploit and trade wildlife (OECD, 2020a).

The right to access wildlife typically involves applying for concessions, tenure or harvest rights (hereafter termed "access rights"). Licenses may be needed for breeding wildlife or developing plantations. Permits may be required to process wildlife, for domestic transportation, international import/export, and to verify the health of the wildlife, among other stages.

The recipients of permits or access rights may be public or private companies, community groups, private individuals or other entities. Access rights may be subject to competing claims, as shifting attitudes, political arrangements or market conditions variously give precedence to and de-prioritize different communities' and stakeholders' access. Additionally,

companies and economic elites with vested interests in access to land or resources may finance political networks and engage in *quid pro quo* arrangements with politicians at various levels in order to manipulate access and permitting processes. For example, a demonstrated link has been found between the expansion of palm oil plantations and electoral corruption in Indonesia, which has led to deforestation and land conflicts (The Gecko Project, 2018). These political, social and economic dynamics fundamentally shape the enabling environment for the reforms outlined in this brief.

The role of corruption

This brief focuses on the stages in a wildlife supply chain where permits for harvest or trade are issued, inspected or accepted, or where access rights are allocated. Permits or access rights are of course just one element in the exploitation, management and trade in wildlife that can be corrupted (Zain, 2020). However, they are vulnerable due to the interaction required between public authorities and the (potential) recipients of permits or access rights (CoP17 Doc. 28, 2016; UNODC, 2019a). Some characteristics of the wildlife trade mean these stages are particularly vulnerable to corruption. These characteristics are explored in Box 1.

Corruption in wildlife trade can take many forms, from a bribe offered by a trader to obtain a fraudulent export permit that falsely verifies wild animals as captive-bred, to an official awarding a logging concession to a company only because it is owned by a family member. Some government positions have significant

Box 1: Characteristics of the harvest and trade in wildlife that make it vulnerable to corruption

Lack of transparency in access and permit allocation process, as well as lack of transparency concerning the terms of permissions granted. At the same time, corruption can still occur in transparent environments if the rules are not followed and enforced.

Harvesting wildlife from public land or waters under government juristiction necessitates interactions between public authorities and those wishing to exploit the wildlife. This is also true for wildife harvested from private or communally-owned land in some places.

Harvest often takes place in large, remote areas, making it difficult to monitor for low-level corruption such as bribes to officials inspecting transport permits, or to ground-truth forests to determine if stock inventories have been inflated to allow unsustainable harvest.

The trade chains for wildlife traded globally can be complex, increasing both the number of permits required and the corruption risk as the number of participants and agencies involved rises. The huge volume of global freight makes it difficult to detect permit fraud or bribes paid to avoid checks.

Wildlife resources are limited. Where rights to access or trade wildlife are restricted below the level of demand, incentives may increase for participants to engage in corrupt acts to gain an advantage over competitors. This risk is likely to be especially relevant for high-value wildlife commodities.

Poor pay for employees responsible for approving access and issuing or inspecting permits increase incentives to participate in corrupt actions.

Individuals throughout the trade chain may see opportunities to make **high financial gain for low risk of penalties or detection**. Individuals may be attracted to roles related to access and permits because of the additional income that can be earned via corrupt means.

(adapted from Arnold et al., 2012; Interpol, 2016; UNODC, 2019)

discretionary powers, for example border permit inspectors or ministers awarding fishing or logging rights. This discretion is vulnerable to abuse if effective monitoring and accountability controls are absent. Abuse of discretionary power can also occur within the private sector, for example when individuals are tasked with obtaining lucrative fishing rights by any means necessary, with little oversight to ensure this is done legally.

The variety of forms of corruption that can occur is explored further in Box 2. Real examples to illustrate these forms of corruption for flora and fauna, marine and terrestrial and from across the globe can be found in Figure 1. While it is easy to identify some incidences of corruption, sometimes corrupt practices are so ingrained in the way that governments, companies and others operate and interact that is it much more difficult to identify and combat.

The impact of corruption

Managing permits and access rights fairly should mean harvest and trade adhere to government regulations, including those on sustainability, legality and disease risk, and that exploitation of wildlife can be tracked and monitored. Governments should benefit by collecting a fair amount of revenue from licensing fees and taxes on legitimate harvest and trade. Recipients of access rights and permits should be confident that they will be awarded, inspected and accepted fairly, and they should understand the criteria upon which any decisions are based.

Corruption undermines the best efforts of those governments, international bodies, companies and civil society who are working to regulate the wildlife trade effectively by:

- **Enabling unsustainable and illegal exploitation and trade** of wildlife, which reduces species populations and **threatens human livelihoods** that depend on the legal use of them.

Box 2: What forms of corruption occur?

Abuse of office - Officials abusing their authority, for example to influence processes for allocating access rights, or when checking permits.

Bribery - The explicit exchange of money, gifts in kind, or favours as payment for access rights or permits that should legally be free or should be allocated on terms other than willingness to pay.

Conflicts of interest - Officials have a personal stake in who receives rights or permits.

Elite capture – Economic, political and social elites gain control of decision-making processes or institutions to skew policies governing access or permitting in their favor.

Extortion - Demand of a bribe or favour by an official for doing his or her duty, or where force or threats are used by individuals such as harvesters or traders to obtain access rights or permits.

Fraud - Issuance and use of illegitimate permits such as fake, counterfeit, fraudulent, expired or forged documents (Outhwaite, 2020). Commonly obtained by corrupting officials through bribery.

Nepotism/Cronyism - Preferential issuance of access rights or permits to family members, friends or associates based on social ties rather than merit or competitiveness.

Private sector corruption - The abuse of professional obligations within a corporation or other non-governmental entity for private gain. This includes individuals or groups from the private sector influencing officials to take decisions and actions that constitute abuses of entrusted power.

These actions can take place at the **administrative** ("petty") or **political** ("grand") level, with the difference often determined by the scale of benefits to those participating in the corrupt action and the commensurate loss of public benefits.

Corrupt actions often take place at the interface of government and private actors, but corruption solely within the private sector is also possible. An example of the latter may be collusion among companies to drive down prices paid for access rights.

(Adapted from Interpol, 2016; Monteiro et al., 2018; U4, 2020).

Figure 1: Case studies where corruption was alleged to have taken place

Cameroon

Abuse of office | Conflicts of interest | Nepotism/Cronyism | Political corruption

Social ties to members of the quota allocation committee and to Ministère des Forêts et de la Faune officials were reported as being critical for those in Cameroon wishing to exploit or transport non-timber forest product Okok (*Gnetum* spp.) used as a vegetable and herbal medicine. ***Waybills and quotas were allocated to well-connected individuals or enterprises*** who were not actually engaged in the Okok trade, but who would sell the waybills and quotas on to small and medium-sized enterprises (SMEs) for a much higher price (up to 500%). This practice meant the State lost out on revenue and SMEs incurred higher costs ([Tieguhong et al., 2015](#)).

Guinea

Abuse of office | Administrative corruption | Conflicts of interest | Fraud | Political corruption

Fraudulent export permits were issued for a large number of apes exported from Guinea to China. While the permits stated that the apes were captive bred, there are no known captive breeding facilities in the country ([UNODC, 2016](#)). The head of the CITES Management Authority was arrested in 2015 and was eventually incarcerated when caught selling official, signed CITES export documents which he had retained after leaving the Management Authority ([OECD, 2017](#)).

Brazil

Fraud

A study in the Brazilian Amazon found significant discrepancies between the estimated timber volumes of the national forest inventory and volumes recorded on logging permits. It is alleged that the volume of ***high-value species was overestimated in logging permits*** to generate a surplus of licensed timber that can be used to launder the timber coming from illegal logging. Field assessments confirmed the reason for discrepancies was likely fraud rather than accidental misidentification ([Brancalion et al., 2018](#)).

Ghana

Abuse of office | Conflicts of interest | Elite capture | Nepotism/Cronyism | Political corruption

In the past decade Ghana has repeatedly imposed temporary bans on the harvest, transport and export of rosewood (Pterocarpus erinaceus). Salvage permits however can be granted to harvest trees from land that is going to be developed for other purposes. An investigation alleged salvage permits were being used as a cover for illegal logging with allegations that the ***permits were issued preferentially to members of the ruling political party*** who would then sell them on for profit to those involved in the illegal trade ([EIA, 2019](#)).

China

Fraud | Private sector

At the time of a 2011 study in China, ivory retailers needed to apply to the government for an identification card for each piece of ivory they wished to sell. Some retailers were *obtaining identification cards and then selling them on to unlicensed traders* to help launder illegal ivory (Gabriel et al., 2012).

Ukraine

Administrative corruption | Conflicts of interest | Fraud | Political corruption | Private sector

A non-profit investigation has alleged serious problems with implementation of the Forestry Stewardship Council (FSC) system in Ukraine, raising questions of *conflicts of interest and inappropriately close relationships* between FSC auditors and government-owned logging enterprises (Earthsight, 2020). One alleged cause is that auditors offering services to certify against the FSC standards are competing for business from the companies who need the certification, leading to a race to the bottom in terms of what they will certify as FSC-compliant. The weakened system is alleged to have allowed wood illegally harvested in Ukraine to be declared as FSC-certified and to enter into global supply chains. A 2020 study by WWF-Ukraine showed that the level of stakeholder participation (including by activists, scientists, local communities and environmental organizations) in certification procedures is low. Only half of certified forestry companies mentioned that external observers attended their audits. These conditions suggest that existing stakeholder engagement practices need to be improved.

Namibia

Abuse of office | Bribery | Conflicts of interest | Private sector corruption | Political corruption

One of Iceland's largest fishing companies is alleged to have paid millions of dollars in bribes to Namibian officials for preferential *access to fishing quotas*, mainly of Horse Mackerel (Trachurus spp.). The bribes were transferred through offshore firms and shell companies. The Minister of Fisheries and Marine Resources and the Minister of Justice resigned and were charged with corruption, money laundering and fraud (Al Jazeera, 2019).

- Negatively **influencing the design of policies and regulations** that control access and trade of wildlife.
- **Misdirecting public money to private companies and individuals**, therefore depriving the government of revenue that should have been invested back into public services and conservation.
- **Posing a risk to human, livestock and wildlife health** if it leads to regulations being circumvented, such as corrupt issuing of false health or phytosanitary certificates in return for a bribe. The Covid-19 pandemic highlights the risk zoonotic diseases pose to health and the global economy (Broad, 2020) underlining the importance of regulations being adhered to. (See WWF & TRAFFIC, 2015).

Recommendations to reduce corruption

Relevant government authorities, donor agencies, international bodies (such as UNODC and FAO), the private sector, other countries in the trade chain and civil society can all play a role in reducing corruption in the permitting system and allocation of access rights. In cases where the entity that needs to implement a recommendation suffers from a high degree of corruption itself, the role of the other actors is even more vital. The recommendations below are interrelated and strengthened by each other, and undertaking a realistic assessment of the political enabling environment for change will help identify the most viable opportunities in any given context.

Map trade chain and identify corruption risk points

The exact vulnerabilities of permits and access rights depend on the specific countries and wildlife in the supply chain. Understanding where these risks lie is important in customizing effective mitigation methods that are realistic and affordable. Existing practical guidance can be used by wildlife authorities to undertake a corruption risk assessment and/or adapted to assessing specific permit or access rights systems (see UNODC, 2019a; UNODC, 2019b).[1] These guidance documents can be tailored for use by anyone wishing to understand and mitigate risk, including the private sector, donors and civil society. In almost any case, a strategy for addressing corruption risks in one trade chain or institution will benefit from being part of a more comprehensive effort to assess and control corruption risks.

Increase transparency and accountability in allocation and issuance of access rights and permits

Transparency and accountability in the processes underpinning the allocation and issuance of permits or access rights can reduce opportunities for corruption and strengthen public confidence. A transparent system gives the public assurance that the system is working in their best interest, and applicants can have some level of assurance that they will be treated fairly. Where the ability of the public and civil society to hold governments or companies to account is hampered, the role of actors such as donors and the private sector is even more crucial.

Some examples of measures to increase transparency can be found in Box 3, but it is critical that measures are realistic, affordable and appropriate for the local context. Some measures are expensive to establish and implement on an ongoing basis, therefore possibilities for sustainable funding need to be considered.

Limit the role of discretion by using technology

Wherever authorities are able to use their discretion to allocate, issue or inspect permits or access

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[1] A third document focusing on addressing corruption in the forestry industry is currently in development by UNODC.

Box 3: Measures to increase transparency in permitting and access right allocation systems

» **Establish clear and transparent rules and procedures for deciding who permits/access rights can and should be issued to.** The criteria used to allocate rights and permits should be open to public scrutiny (Kolstad & Søreide, 2009).

» **Establish clear selection criteria, particuarly if the permit/access rights process is competitive.** Any pre-conditions should be made openly available. Much guidance can be found regarding the pros and cons of different competition award types such as open auction, sealed bid auction and competitive negotiation (see FAO & EFI, 2018).

» **Develop and enforce mechanisms aimed at ensuring compliance with rules, procedures and criteria to ensure they are not abused or circumvented.** For example, involve an independent observer to monitor compliance with concession award process (FAO & EFI, 2018).

» **Establish and utilize an independent ombusdman to receive and investigate complaints of maladministration of permits/access rights.**

» **Publicize national laws and regulations related to access, management and trade of wildlife.** National Legality Frameworks are one way to do this (Rakotoarisoa et al., 2016). Highlight which authorities are responsible and how they can be contacted. This helps all actors including companies understand the rules and can allow civil society, donors and others hold those responsible for digressions to account (UNODC, 2019b).

» **Establish and utilize freedom of information laws. Supporting regulations may be necessary to specify what information needs to be made available and what is considered as commercially sensitive** (Transparency International, 2017).

» **Employ an effective traceability system with the ability to trace the wildlife from the point of origin, through the processing history and distribution.** Such a system can aid in reducing corruption, in terms of reducing fraud and forgery of permits (Wyatt et al., 2018) by providing a structure for the storage and transfer of information between those in the supply chain.

» **Create publicly accessible databases of the actors that have been issued permits or access rights.** For example, the Directorate of Fisheries of Iceland maintains an online central database where members of the public can search by vessel or operator and find the quota each have been allocated by species (Fiskistofa, 2020).

rights, there is the potential for corruption to occur. Regulations that are complicated, untransparent or even contradictory increase the scope for corruption even further (Kolstad & Søreide, 2009). Automation and computerization of bureaucratic processes such as issuing or checking permits can reduce corruption by removing interactions between the applicant and issuer. Electronic systems can also be used to detect the use of fraudulent permits, which may have been issued corruptly (Outhwaite, 2020).

However, the scope of these approaches is limited, and they may carry risks that need to be examined. For example, such systems are more effective for dealing with petty corruption involving lower-level bureaucrats than for grand corruption involving higher-level officials. Systems may have unexpected consequences and introduce new actors if not well designed. For example, if permits originally purchased physically from a public official are made available online, a small number of individuals might be able to take advantage of the change by buying up lots of permits online and selling them on for a profit (Baniamin, 2015). Technological systems can be incredibly sophisticated, but all cost money to develop and implement on an ongoing basis, and this must be factored in to ensure resulting systems are fit for purpose and do not become obsolete in a few years. Levels of internet use and the general robustness of telecommunication infrastructure are important factors to take into account. Automation may also mean that fewer staff are needed to complete required processes, resulting in job losses.

While technology has the potential to reduce the role of corruption through limiting discretion, it will not stop it fully—particularly when high-level officials are involved. Monitoring will be required, and where irregularities are detected these should be investigated and sanctions imposed where necessary.

Apply serious penalties to deter companies from engaging in corrupt behaviors

Companies engaging in corrupt behavior to obtain or use permits or access rights should face the prospect of revocation, at minimum, as well as other penalties.

Blacklisting such companies from future access or permit opportunities can form part of the clear and transparent rules and procedures regarding to whom permits/access rights can and should be issued to discussed above. Implicated individuals should be subject to civil or criminal charges brought in a just, timely fashion (FAO, 2017).

Far-reaching laws such as the Foreign Corrupt Practices Act (USA), the Bribery Act (UK), the Criminal Law (China) and anti-corruption legislation adopted by European Union Member States can be a powerful deterrent against corrupt actions. For example, the U.S. Foreign Corrupt Practices Act prohibits the payment of bribes to foreign officials and can apply anywhere in the world and extend to publicly traded companies and their officers, directors, employees, stockholders, and agents (U.S. Securities and Exchange Commission, 2017). Similarly, China's Criminal Law prohibits the bribery of foreign public officials or officials from international public organization (CECC, 2011). This complements China's Foreign Trade Law, which prohibits unfair competition in foreign trade activities (such as selling commodities at unreasonably low prices, commercial bribery and colluding with others in a tender bid) (Zeng, 2017).

Investigate corruption using anti-money laundering tools

If penalties faced by government employees, companies and individuals who engage in corrupt acts are not serious enough to act as a deterrent to them or to others, anti-money laundering legislation (AML) may be more effective. AML tools can lead to the individuals involved, including their families, losing assets they have acquired with the laundered money. AML tools can be used to address corruption involving politically exposed persons (PEPs) and large sums of money (Fontana & Pereira, 2012), so they may be of most use when significant bribes have been paid to secure lucrative access rights for timber or fisheries. The financial institutions that accept corrupt proceeds should also be subject to scrutiny.

Limit incentives and opportunities to engage in corrupt behaviors and punish violations

Low pay is commonly thought to be a driver of government employees engaging in corrupt behaviors by supplementing their income with bribes. However, there is little evidence that pay reform alone is effective in curbing corruption (Johnsøn et al., 2012). Instead it should be part of a wider package to reform government employees' behavioral norms, incentives and oversight structures (DfID, 2015). Corruption may be reduced through a focus on integrity in recruitment, training, appraisal and promotion of government employees; individuals may be less willing to engage in corruption if they believe it will harm their job security and long-term prospects (DfID, 2015). Government employees found to be engaging in corruption should face repercussions brought in a timely fashion and appropriate to the seriousness of their violation, from being fired or blacklisted from applying for other government jobs, to being subject to civil or criminal charges.

Streamlining bureaucratic processes is often suggested as another way to decrease opportunities for corruption. Excessive or overly rigid administrative procedures, requirements for unnecessary permits or licenses and protracted decision-making processes may all create incentives to use bribes to circumvent them (Martini, 2013). The evidence supporting the true impact on corruption of reducing bureaucracy is limited (DfID, 2015). A certain level of bureaucracy is required to ensure resource exploitation is sustainable, that stocks can be monitored and that relevant fees and taxes can be collected. In some cases, involvement of multiple people or committees in decision making can actually be an important anti-corruption tool to increase oversight and reduce concentration of discretionary powers. Conducting a Regulatory Impact Analysis (RIA) is one approach that can be used critically to assess the positive and negative effects of regulations and identify non-regulatory alternatives (OECD, 2020b).

As noted above, technology can be used to decrease government employees' discretionary power as well as strengthen the capacity to trace and monitor administrative actions and flag suspicious activity (DfID, 2015).

Way forward

Reducing corruption in permitting and access rights allocation systems can increase revenues earned by the State through fees and licensing and reduce illegal or unsustainable exploitation or trade of wildlife. However, there are challenges in implementing any of the recommendations suggested above. The most immediate of these is limited financial resources that can be directed at anti-corruption efforts, which are likely to be further squeezed as the Covid-19 pandemic reduces budgets of government authorities, the donors and civil society that support them, and the private sector. This makes the first recommendation to identify corruption risk points and develop mitigation measures that are politically realistic, affordable and appropriate for the local context even more critical.

Peter Chadwick / WWF

Author's Disclaimer

The author is not responsible for the source information used in this brief and does not take a position on the claims made regarding the specific allegations of corruption that are cited. Readers should refer to the original references to make their own conclusions.

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