# NATIONAL STRATEGY TO COMBAT WILDLIFE AND FOREST CRIME IN NIGERIA 2022–2026

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Acknowledgements

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Glossary

AEPB	Abuja Environmental Protection Board
AML	Anti-money laundering
ANI	Africa Nature Investors Foundation
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
ECOWAS	Economic Community of West African States
EFCC	Economic and Financial Crimes Commission
EIA	Environmental Investigation Agency
FAAN	Federal Airports Authority of Nigeria
FDF	Federal Department of Forestry
FDFA	Federal Department of Fisheries and Aquaculture
FMARD	Federal Ministry of Agriculture and Rural Development
FMOE	Federal Ministry of Education
FMENV	Federal Ministry of Environment
FMFBNP	Federal Ministry of Finance, Budgets and National Planning
FMIC	Federal Ministry of Information and Culture
FMOJ	Federal Ministry of Justice
FRIN	Forestry Research Institute of Nigeria
ICCWC	International Consortium on Combating Wildlife Crime
ICPC	Independent Corrupt Practices Commission
INTERPOL	The International Criminal Police Organization
IUCN	The International Union for Conservation of Nature
IWT	Illegal Wildlife Trade
KPI	Key Performance Indicator
M&E	Monitoring and Evaluation
NAQS	Nigeria Agricultural Quarantine Service
NCF	Nigerian Conservation Foundation
NCS	Nigeria Customs Service
NESREA	National Environmental Standards and Regulations Enforcement Agency
NFIU	Nigerian Financial Intelligence Unit
NIFFR	National Institute for Freshwater Fisheries Research
NIOMR	Nigerian Institute for Oceanography and Marine Research
NIMASA	Nigerian Maritime Administration and Safety Agency
NIPOST	Nigeria Postal Service
NJI	National Judicial Institute
NOA	National Orientation Agency
NPA	Nigerian Ports Authority
NPS	National Park Service
NSF	National Stakeholders Forum for Combatting Wildlife and Forest Crime in Nigeria
PROWPMAN	Processed Wood Producers and Marketers Association of Nigeria
RMRDC	Raw Materials Research and Development Council
SDF	State Departments of Forestry
TWEAN	Tropical Wood Exporters Association of Nigeria
UNODC	United Nations Office on Drugs and Crime
WCO	World Customs Organization
WCS	Wildlife Conservation Society
WASCWC	West Africa Strategy on Combating Wildlife Crime
Wildlife crime	The term 'wildlife and forest crime' has been shortened to 'wildlife crime' throughout this text. This is not intended to limit the scope of the assessment and all references to 'wildlife crime' should be interpreted to mean poaching and/or illicit trafficking in wildlife, forest and fisheries products, parts and derivatives.

Foreword

The role of biodiversity in our economy, environment, health and social lives is vital and diverse. We use it as food, fibre, domestic and commercial products, medicine, and for aesthetics and culture, agriculture, knowledge, and industrial processes. Our survival and overall wellbeing depend on how sustainably the environment and its biodiversity are managed. However, serious environmental challenges have led to the loss of biodiversity and threatened our existence. Habitat change, over-exploitation, pollution, invasive alien species, climate change and wildlife and forest products trafficking are the major drivers of biodiversity loss. The attention of the world has been drawn to the need to protect and preserve our precious biodiversity, which include wildlife and forest resources against human unsustainable practices as well as the unbridled activities of the in-country and transborder criminal syndicates.

Nigeria, over the past few years, is becoming known as a hub for the trafficking of wildlife products either originating or transiting through our borders and this is a negative trend that that the Nigerian Government is determined to stop. We must stop these criminal syndicates and protect our precious biodiversity and the Federal Government has been taking necessary measures to protect, restore and promote the sustainable use of our terrestrial and aquatic eco-systems, sustainably manage forests, combat desertification, land degradation and biodiversity loss. These efforts are yielding results as, in 2021, we witnessed a commendable increase in the interdiction and seizures of illegally trafficked wildlife and forestry products.

The Nigerian National Strategy to Combat Wildlife and Forest Crime 2022-2026 is a significant tool in Nigeria's efforts in tackling these issues, in a holistic evidence-based manner and in conformity with international best practices as well as the relevant Treaties and Conventions to which Nigeria is a signatory which include the Convention on International Trade in Endangered Species of Fauna and Flora (CITES) and the United Nations Convention on Transnational Organized Crime (UNTOC).

This Strategy document has been developed through multi-sectoral engagements and collaborations and would likewise, require a multi-sectoral approach in its implementation. It sets out Nigeria's Vision for eradicating wildlife crime: "A Nigeria Free of Wildlife Crime" and I am confident that the collaborative partnerships which we have forged in developing this strategy would ensure that we achieve this vision.

I would like to commend the National Stakeholders Forum for Combatting Wildlife and Forest Crime in Nigeria which has been at the forefront of developing and finalising this document. I am confident that a similar verve would be adopted in ensuring the implementation of this Strategy.

I would also like to thank the United Nations Office on Drugs and Crime (UNODC) and the Government of Germany in driving the process of development and finalisation of this important strategic tool as well as the collaboration of our other international partners in complementing Nigeria's efforts to tackle wildlife and forest crime. I earnestly hope to see the much expected reversal in the current trend as we work together for the benefit of our planet.

H.E Sharon O. Ikeazor, Esq.
Honourable Minister of State for Environment

Executive Summary

Protection of natural ecosystems and biodiversity is an essential pre-condition for a fair and equitable society, a functional economy, and ultimately a sustainable future. Halting overexploitation, including through combating wildlife crime, is necessary to ensure such a future. Nigeria faces major developmental challenges that will only be overcome if the environment is safeguarded and restored. Wildlife crime is a major source of illicit funds, creating significant negative impacts on biodiversity and society, but despite this, tackling wildlife crime is often overlooked and not prioritised. The actors involved in wildlife crime are organised networks, converging with other serious organised crimes, including arms, drugs and human trafficking, corruption, and money-laundering.

The importance of combatting wildlife crime in Nigeria must not be underestimated. Nigeria has emerged as a key source, destination, and transit country for international illegal wildlife trade (IWT) over the last decade. In 2016, Asian countries imported about 1.4 million m³ of rosewood from West Africa, of which 58 per cent came from Nigeria. Furthermore, Nigeria is the primary exit point for ivory trafficked from Africa to Asia. Nigeria-linked ivory seizures totaled 5,629 kgs between 2009–2011; 11,769 kgs between 2012–2014; and 12,211 kgs in the period 2015-2017.[1] In 2019, at least 51 tonnes of pangolin scales originating from Nigerian ports were seized globally. Seizures have increased in 2021; first, in January 2021, a seizure at the Apapa Port contained 2,772 pieces of elephant tusks, weighing 4,752 kgs; 162 sacks of pangolin scales, weighing 5,329 kgs; 5 kgs of rhino horns; 103 kgs of skulls suspected to be of lions and other wild cats; and 76 pieces of processed timber. Later in July 2021, three suspects were arrested with 196 sacks seized containing 7,167 kgs of pangolin scales, 4.6 kgs of pangolin claws and 888.5 kgs of ivory. Then in September 2021, 25 kgs of ivory was seized. Prior to this, two suspects were arrested for being in possession of 15 sacks containing over 1 tonne of pangolin scales, and 5 kgs of pangolin claws. Nigeria has become the key country in the consolidation, packing, sale and export of ivory and pangolin scales to Asian markets. These recent seizures demonstrate that Nigeria is starting to respond to this issue. Nigeria additionally faces major challenges in controlling illegal trade in charcoal and timber and in addressing Illegal, Unregulated, and Unreported (IUU) fishing and crimes in the fisheries sector.

The drivers of wildlife crime in Nigeria vary widely. Notable amongst these are the porous borders of Nigeria, corruption, limited political will, challenges in enforcement, regional instability, growing economic development, weak governance and institutions, population growth and associated pressures, lack of awareness and knowledge, and poverty. They have all been proposed as drivers of wildlife crime and enabling conditions that make Nigeria vulnerable to wildlife crime. To generate systemic change, Nigeria needs to address these, and remove the enabling conditions that allow wildlife crime to flourish.

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1   UNODC, C. West and Central Africa Wildlife Crime Threat Assessment. (2019).

The National Strategy to Combat Wildlife and Forest Crime in Nigeria,[2] the first document of its kind, is critical for setting the country on the correct path towards attaining the vision of **a Nigeria Free of Wildlife Crime**. Achieving this ambitious **vision** will require multiple five-year long-lasting strategies. As a start, the 2022–2026 National Strategy aims to lay the foundation for sustained, long lasting change. Combatting and reducing wildlife crime first requires that all the key stakeholders have the capabilities as well as policy and analytical frameworks to understand, detect and deter wildlife crime, enforce the law and effectively sanction criminals. The National Strategy has set a five-year goal that by 2026, Nigeria will have made demonstrable progress in reducing wildlife crime, while its law enforcement and criminal justice system will have the requisite capabilities and a fit-for-purpose legal framework to effectively and collaboratively tackle wildlife crime.

The strategy sets out the objectives as described below. By achieving the defined objectives, Nigeria will have the institutional commitment, necessary organisational structures and capabilities to effectively address both transnational and domestic wildlife crime.

1. **Enhance institutional capabilities:**
   Develop the capabilities in all relevant institutions to drive evidence-based action to understand, detect and deter wildlife crime, enforce the law and sanction those involved in wildlife crime. In order to ensure sustainable action, it is essential that all relevant institutions have the organisational capabilities to enable them to fulfill their roles within the larger system.

2. **Strengthen the legal framework:**
   Enable legal and sustainable trade, protect Nigeria's fauna and flora, and deter wildlife crime through a harmonised and strengthened legal framework. Wildlife crime must be recognised as a serious crime. By strengthening the legal framework, Nigeria can ensure successful and fair prosecutions, resulting in swift and certain sanctions that deter wildlife crime perpetrators.

3. **Increase collaboration:**
   Ensure strong coordination, led by accountable partners, to facilitate national and international collaboration and information sharing between all relevant stakeholders to combat wildlife crime. Implementing the National Strategy will require all stakeholders to pull together towards the shared vision. Increasing collaboration and coordination, under the direction of specific lead agencies, will facilitate the implementation of the Strategy and ensure effective and proactive information and intelligence sharing to prevent and combat wildlife crime.

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2   Hereafter referred to as the National Strategy.

4. **Honour commitments:**

Ensure compliance with national and international commitments to regulate legal trade and combat wildlife crime. To elevate the status of wildlife crime as a serious crime, Nigeria must adhere to its national and international commitments related to legal trade and wildlife crime. Honouring these commitments is a clear demonstration of Nigeria's willingness to tackle wildlife crime. Nigeria should commit adequate financial and human resources to address wildlife crime.

5. **Remove enablers of crime:**

Tackling corruption risks and preventing financial crime from enabling wildlife crime. By tackling corruption risks and targeting illicit financial flows that emanate from wildlife crime, one can reduce the opportunity for, and benefits from, wildlife crime. Taking proactive steps through targeted interventions will provide a conducive environment for the agencies to effectively tackle wildlife crime.

6. **Raise awareness of wildlife crime:**

Generate social and political will by raising awareness in all stakeholders as to the value of nature and the threat of wildlife crime. Nigeria will need political and social will and commitment to enable success. Raising awareness at all levels can facilitate this willingness and commitment to change.

7. **Provide alternative livelihoods:**

Empower local communities through developing wildlife crime prevention initiatives and providing alternative livelihoods. Providing alternative livelihoods can empower local communities, providing financial resilience so that individuals do not need to engage in wildlife crime. This objective will target communities that are more vulnerable to engaging in wildlife crime.

The National Strategy was developed during 2020–21, following a consultative process involving all key stakeholders. Individual partner meetings were held to prepare the outline and themes for a national workshop, held in Abuja in May 2021 and attended by a subset of the stakeholders. The workshop developed a draft vision, goals, objectives, outcomes, and implementation framework. A draft strategy was prepared, based on the agreed outline, and then refined through an iterative process of comments, roundtables, and virtual workshops. The final strategy was presented to the stakeholders and decision makers at the major agencies.

The National Strategy relies on significant collaboration between state agencies, non-governmental organisations (NGOs), and the international community, including source, transit and destination countries. Implementation will require strong leadership; the Federal Department of Forestry, under the Federal Ministry of Environment, is the lead agency for the National Strategy. The strategy framework lists lead actors for each output, who will engage other partners to implement the required activities. Nigeria has established the National Stakeholders Forum for Combatting Wildlife and Forest Crime in Nigeria (NSF), providing a platform for

networking, coordination and driving policy change. Focal points from organisations that are not part of the NSF should be identified as well. To maximise joint action, Nigeria will require three additional taskforces with clearly defined roles. These are:

- A **Resource Mobilisation Taskforce** should be convened, consisting of key NSF representatives. This taskforce must develop an outline of resource needs and align all the agencies and engage the donor community to mobilise resources for implementation.

- An **Operational Taskforce** will play a critical role in bringing together the mandated law enforcement agencies, enabling close collaboration and coordination on law enforcement operations, intelligence sharing and investigations.

- The creation of a **Fisheries Taskforce** is also recommended, given the different stakeholders involved in tackling IUU fishing and crimes in the fisheries sector.

While the National Strategy does not outline which agencies should be represented on each of the forums and taskforces, the taskforces should be independent (see Figure 8 for further details).

The National Strategy is part of a wider initiative by Economic Community of West African States (ECOWAS) to tackle wildlife crime across the West African region. Nigeria played a key role as chair of the steering committee for the development of the regional West Africa Strategy on Combating Wildlife Crime (WASCWC), which has now been validated by ECOWAS Environment Ministers. The National Strategy will provide an opportunity for Nigeria to support implementation of the WASCWC. Addressing wildlife crime in collaboration with ECOWAS partners, including through the West Africa Network to Combat Wildlife Crime (WANCWC), is a unique and vital opportunity to bring organised criminal groups operating in the region to justice.
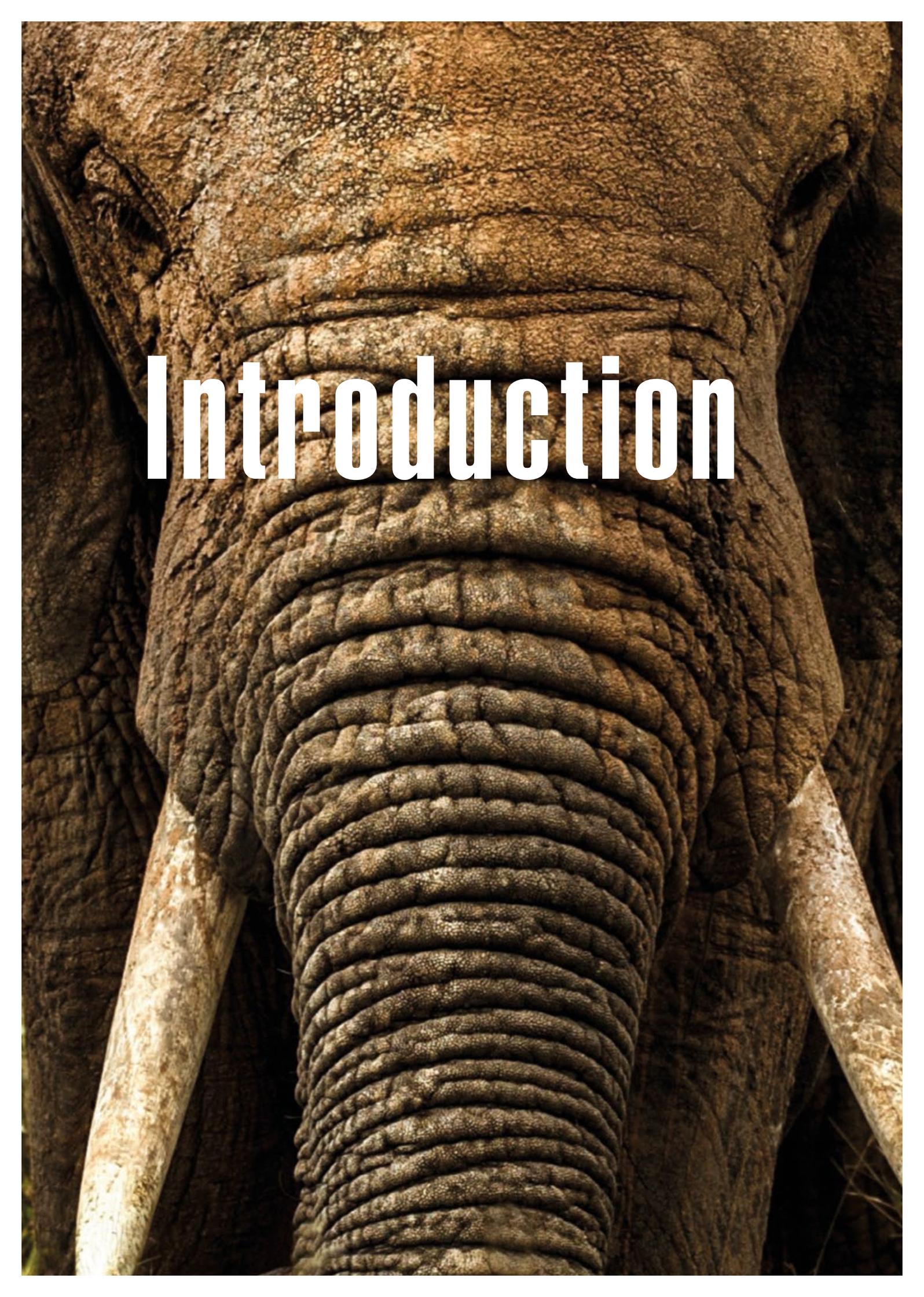
Introduction

Wildlife and forest crime is defined as *"the taking [including poaching], trading (supplying, selling, or trafficking), importing, exporting, processing, possessing, obtaining and consumption of wild fauna and flora, including timber and other forest and fisheries products, in contravention of national or international law"*.[3] For this document, the term "wildlife and forest crime" has been shortened to "wildlife crime". This is not intended to limit the scope of the work and all references to "wildlife crime" should be interpreted to mean poaching and/or illicit trafficking in wildlife, forest and fisheries products.

A.   Wildlife crime undermines sustainable development

The protection of natural ecosystems and biodiversity is an essential pre-condition for a fair and equitable society, a robust, functional economy, and ultimately a sustainable future. Natural, functioning ecosystems provide services that ensure our continued existence and well-being, underpin the global economy and allow for a functioning society. According to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), over one million species will become extinct in the coming decades if current trends continue,[4] and overexploitation, partly due to wildlife crime, is the second highest threat to nature (and the greatest threat to marine species). The World Economic Forum has ranked biodiversity loss as fifth (in terms of likelihood) and fourth (in terms of impact) in the top global risks to our planet.[5] The recognition of these risks is critical, because humans do not exist in isolation; ecosystems, economies, and societies are interconnected.[6] Most of nature's "services" are irreplaceable. Biodiversity loss undermines sustainable development objectives, has a detrimental effect on the functioning of the planet and can result in large-scale humanitarian crises when ecosystems collapse.

The Federal Republic of Nigeria (hereafter referred to as "Nigeria") is familiar with the effects of such large-scale environmental change and the impact on livelihoods: in the last 60 years, Lake Chad, once one of Africa's largest lakes, has decreased in size by over 90 per cent in large part due to water overutilisation, exacerbated by climate change. The historically abundant fisheries, agriculture and pasture have been decimated and the livelihoods of an estimated 49 million people, many of which are in Nigeria, that depend upon the Lake Chad basin resources are in a precarious situation.[7] The same situation is developing in other areas of Africa where large-scale overutilization leaves regions ecologically fallow and unable to provide for the people that depend on the landscape. Simply put, halting overexploitation, including through combatting wildlife crime, is a necessary precondition to ensuring a sustainable future.

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3   https://cites.org/eng/prog/iccwc/crime.php
4   Díaz et al. The global assessment report on biodiversity and ecosystem services: Summary for policy makers. (IPBES, 2019).
5   World Economic Forum, "The Global Risk Report" (Switzerland: Global Economic Forum, 2020).
6   Rockström et al., "Planetary Boundaries: Exploring the Safe Operating Space for Humanity," Ecology and Society 14, no. 2 (2009).
7   Chitra Nagarajan et al., "Climate-Fragility Profile: Lake Chad Basin," Berlin: Adelphi 32 (2018).

The impact of biodiversity loss is particularly acute in Nigeria due to the socio-economic context of the country. Nigeria is the largest economy in the African continent and is home to over a quarter of the population of Sub-Saharan Africa, an estimated 206 million people. With a current growth rate of 2.6 per cent, the population of Nigeria is projected to increase to 263 million by 2030 and to 401 million by 2050.[8] Forty percent of the total population lives below the country's poverty line, while another 35 per cent of the population is vulnerable to poverty.[9] Nigeria's economy entered a recession in 2020, reversing three years of recovery since the 2016 oil-driven recession, due to a fall in crude oil prices on account of falling global demand and containment measures to fight the spread of COVID-19.[10] According to the Nigerian National Bureau of Statistics' (NBS) Labour Force Survey, Nigeria's unemployment rate was at 33 per cent by the end of 2020, a 5.2 per cent increase from the second quarter of 2020.[11]

Nigeria faces some major developmental challenges that can only be tackled if the environment is protected and restored. Clearly, wildlife crime must be addressed if these objectives are to be achieved but tackling wildlife crime is a complex issue. As with any illicit trade, there are various enabling conditions such as poor governance, corruption, and weak institutions. Wildlife crime exploits the resources of countries, while the effects of wildlife crime are disproportionately felt by vulnerable individuals and communities, some of whom are also perpetrators. Wildlife crime directly contributes to a growing illicit economy worth millions of dollars. For example, the UNODC World Wildlife Crime Report 2020 estimates the value of the ivory trade between $310–570 million[12], and the trade in rhino horn between $170–280 million.[13] Detailed summaries of key traded products are provided in the situational analysis. It is in the context of Nigeria's large, growing population of vulnerable people with limited opportunities, weakened institutions and structural challenges that wildlife crime is taking place in Nigeria.

B. Wildlife crime is often organised crime

Not all wildlife crime is part of organised crime,[14] however wildlife crime is a growing component of transnational organised crime. Organised crime is defined here as "a structured group of three or more persons; that exists for a period of time; and acts in concert with the aim of committing at least one serious crime; to obtain, directly or indirectly, a financial or other material benefit".[15] This definition does not necessarily imply a vertically integrated hierarchical structure; these criminal groups, working within the IWT supply chain can be decentralized,

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8   UN Department of Economic and Social Affairs., "World Population Prospects," 2019, https://population.un.org/wpp/

9   The World Bank Group, "Nigeria Overview," 2020, https://www.worldbank.org/en/country/nigeria/overview

10   African Development Bank Group, "Nigeria Economic Outlook," accessed 7 February 2021, https://www.afdb.org/en/countries-west-africa-nigeria/nigeria-economic-outlook

11   National Bureau of Statistics, "Labor Force Statistics: Unemployment and Underemployment Report (Q4 2020)," 2021, https://nigerianstat.gov.ng

12   Unless otherwise indicated, all $ figures refer to US dollars.

13   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

14   Gore et al. 2021. Typologies of urban wildlife traffickers and sellers. Global Ecology and Conservation 27(2):e01557

15   The United Nations Convention against Transnational Organized Crime, General Assembly resolution 55/25 of 15 November 2000.

dispersed and have fluid structures,[16] varying in size, sophistication and capabilities from a small group of savvy traders, purchasing from local harvesters and selling to the highest bidder, to larger international smuggling operations.

Wildlife crime is an extremely lucrative industry with illicit ivory trade valued between $310–570 million and the trade in rhino horn between $170–280 million,[17] with demand for wildlife and forest products driving high prices of illegal products, and in some cases, violence and regional insecurity.[18] The motives for engaging in wildlife crime are many. In some cases, sheer poverty and food insecurity can drive people to crime, and in others, it is crime driven by a profit motive. However, despite its impact on biodiversity and society, wildlife crime is often overlooked, not prioritised and under-prosecuted resulting in a situation where criminals can currently benefit from low risk and lightly sanctioned wildlife crime, which presents minimal risk compared to other crimes that are considered as more serious.

Wildlife crime does not necessarily function in isolation of other crimes or other criminal activity such as money-laundering, human trafficking, and arms and drugs smuggling. In fact, these crimes can enable one another and exacerbate further crime; syndicates can exploit the same transportation routes and corrupt supply chains to fulfil orders. Wildlife crimes also converge; for example, both timber exports and charcoal exports have been shown to facilitate the illegal transport of ivory and pangolin scales.[19] But there is increasing evidence of convergence between wildlife crime and other serious crimes. This fact is important to recognise since it implies that it is not possible, efficient, or practical for wildlife law enforcement agencies to work in isolation, or in isolation of the broader law enforcement and security clusters of the government.

The increased sophistication of organised crime has resulted in an adaptable network that has shown resilience in the face of law enforcement and criminal justice efforts. Wildlife crime syndicates shift markets, sources and trafficking routes in response to market demand, regulation and enforcement capacity. As regulations strengthen and capabilities to tackle wildlife crime increase, it is expected that markets will shift to countries with weaker regulatory frameworks and law enforcement capacity. In addition, organised crime, increased enforcement, and ease of operations in online marketplaces have driven a recent shift to online markets and the co-opting of legal trade markets into the illicit supply chain, including through captive breeding operations.[20]

Wildlife crime syndicates exploit complex supply chains and legislative loopholes to conduct their operations, taking advantage of porous borders, corruption risks, weak institutions and rule of law, low human development and subsequent poverty, armed conflict hotspots and instability therein. When combined with the richness of West African biodiversity, these factors

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16   Mandel, Dark Logic: Transnational Criminal Tactics and Global Security Stanford University Press, Palo Alto (2011).
17   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html
18   Moreto and van Uhm, "Nested Complex Crime: Assessing the Convergence of Wildlife Trafficking, Organized Crime and Loose Criminal Networks," The British Journal of Criminology, 2021.
19   Environmental Investigation Agency, "Double Impact – The Nexus Where Wildlife and Forestry Crime Overlap," 2021, https://eia-international.org/report/double-impact-the-nexus-where-wildlife-and-forest-crime-overlap/
20   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

interact to make the region exceptionally vulnerable to wildlife trafficking networks.[21] Nigeria has one of the highest levels of organised crime on the African continent,[22] and combined with a robust port system and transport infrastructure, Nigeria has become a hub for illegal wildlife trade. Given all the above, and the criminality associated with wildlife crime, it is in Nigeria's best interests to combat wildlife crime, especially where it is difficult to ascertain whether wildlife products have originated from Nigeria or from other sources. As a necessary first step, it is important to elevate wildlife and forest crimes as "serious crimes".

C. Negative social, political and economic impacts of wildlife crime in Nigeria

Not all wildlife crime in the country relates to Nigeria's natural capital. Nigeria has emerged as a key source, destination, and transit country for international IWT.[23] While illegal wildlife products trafficked from other countries may not have a direct impact on the biodiversity of Nigeria itself, there are wider implications of allowing the country to be a transit hub for illegal activity. Wildlife crime exacerbates other forms of organised crime, and thereby facilitates corruption, and associated crimes. The political and economic implications of not being able to prevent and control crime has far reaching consequences, such as triggering the Convention on International Trade in Endangered Species of Wild Fauna and Flora's (CITES) penalties that can prohibit trade, which can negatively impact economies.

It is within this context of entrenched regional organised crime and high levels of national wildlife crime, that the National Strategy is being developed. As this is the country's first National Strategy on Wildlife and Forest Crime, Nigeria will lay the foundations for systemic change to tackle wildlife crime, in collaboration with regional counterparts, all of whom must be networked to combat wildlife crime. Given the broader regional dynamics and impacts of wildlife crime, the development of this National Strategy complements the WASCWC.

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21 Environmental Investigation Agency, "Out of Africa: How West and Central Africa Have Become the Epicentre of Ivory and Pangolin Scale Trafficking to Asia," 2020, https://reports.eia-international.org/out-of-africa/
22 INTERPOL, "Overview of Serious and Organized Crime in West Africa," September 30, 2018, https://enact-africa.s3.amazonaws.com/site/ uploads/2018-12-12-interpol-west-africa-report.pdf
23 Emogor et al. 2021. The scale of Nigeria's involvement in the trans-national illegal pangolin trade: Temporal and spatial patterns and the effectiveness of wildlife trade regulations. Biological Conservation, 264, p. 109365.
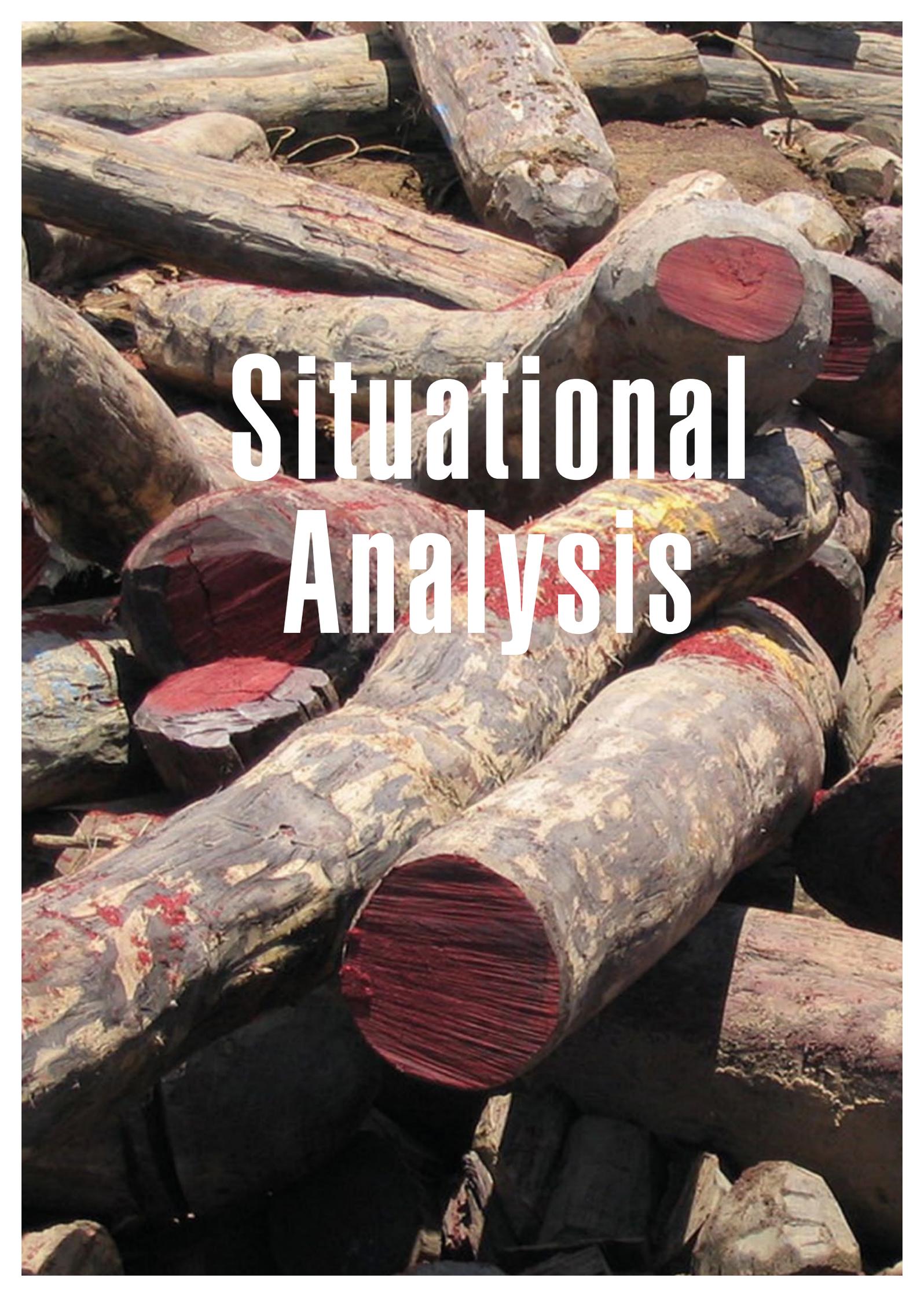
Situational Analysis

Nigeria has variable climatic conditions and physical features, which have combined to create some of the richest floral and faunal biodiversity in Africa. The country's natural ecosystems range from semi-arid savanna to mountain forests, rich seasonal floodplain environments to rainforests, and vast freshwater swamp forests to diverse coastal vegetation. Nigeria's Niger Delta contains the largest mangrove habitats in Africa. Currently, Nigeria is estimated to host over 864 bird species, 117 species of amphibians, 203 reptiles, over 775 fish species, 285 mammals, and over 4,715 species of vascular plants,[24] and there are likely to be many more undocumented species. However, the country's natural resources are disappearing at an alarming rate as a result of human pressure, in particular land-use change, and overexploitation through hunting, logging and fishing. Wildlife crime is a major driver of this overexploitation, but wildlife crime is not a purely local phenomenon.

The available data of seized shipments from the World Wildlife Seizures (World WISE) database shows Nigeria in the top five for both source and destination countries globally over the last decade (Table 1). The established trade routes and robust ports have been co-opted for illegal purposes by organised criminal networks with illegal products sourced from West and Central Africa and consolidated in Nigeria before being shipped overseas. The wildlife products cover a wide range, and while precise volumes are difficult to identify, seizure data can be used to estimate the scale of illegal trade and the recent growth in the role of Nigeria as a consolidation hub for global IWT.[25] As an example, a seizure in January 2021[26] at the Apapa Port by the Nigeria Customs Service contained 2,772 pieces of elephant tusk, weighing 4,752 kgs; 162 sacks of pangolin scales, weighing 5,329 kgs; 5 kgs of rhino horns; 103 kgs of skulls suspected to be those of lions and other wild cats; and 76 pieces of processed timber. Nigeria Customs Service officers searched a residential address in Lagos in July 2021, arresting three suspects and seizing 196 sacks containing 7,167 kgs of pangolin scales, 4.6 kgs of pangolin claws and 888.5 kgs of ivory.[27] In addition, in September 2021, 25 kgs of ivory was seized, and two suspects were arrested for being in possession of 15 sacks containing over 1 tonne of pangolin scales, representing over 2,500 dead pangolins, and 5 kgs of pangolin claws.[27]

Table 1:

Top five source and destination countries, in terms of all reported seized shipments, 2007–2019.

Source of shipment			Source of shipment		
Country	Seizure	%	Country	Seizure	%
Nigeria	995	93	USA	443	39
Cameroon	24	2	China (incl.HK)	244	23
India	7	1	Nigeria	44	4
Mali	6	1	Germany	16	1
South Africa	5	0	Viet Nam	13	1
Unspecified	17	2	Unspecified	245	23

Source: World WISE.

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24 Butler, "The Top 10 Most Biodiverse Countries," 2016, https://rainforests.mongabay.com/03highest_biodiversity.htm.
25 UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html
26 https://www.unodc.org/nigeria/en/wildlife-trafficking-through-nigerian-ports-continues-despite-covid-19.html
27 https://wildlifejustice.org/joint-operation-with-nigeria-customs-service-leads-to-three-arrests-and-seizure-of-7-1-tonnes-of-pangolin-scales/

To illustrate the context of the problem in Nigeria, the following sections provide a brief synopsis of the major species and issues related to wildlife crime, including examples of both international and domestic wildlife crime. Rosewood, elephant ivory and pangolin scales were identified as the three largest wildlife crime related commodities globally, between 2014–2018 (Figure 1), all of which are included as examples. Nigeria is a major player in all three of these supply chains.[25]

Figure 1:

Share of type of wildlife among total seizures (aggregated on the basis of standard value*), 2014–2018.
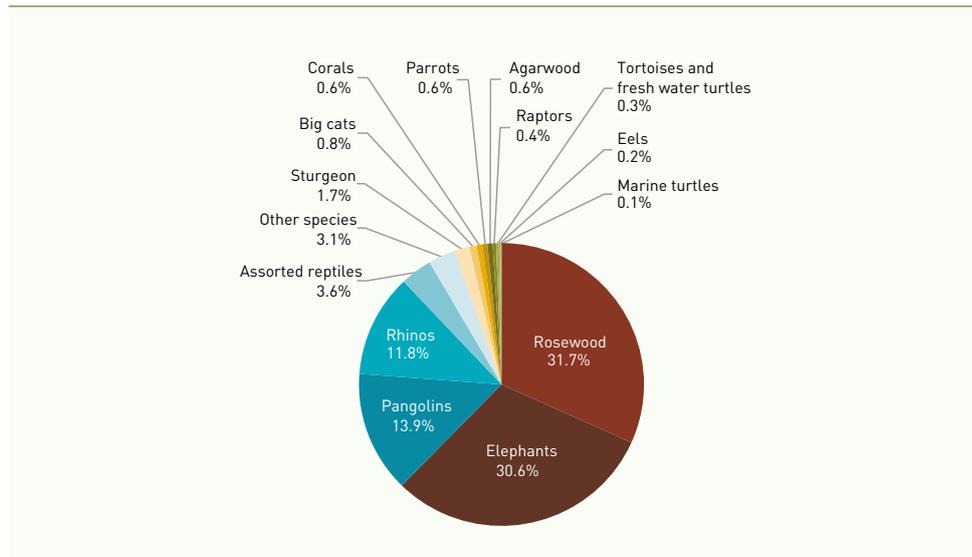
Source: Extract from UNODC World Wildlife Crime Report (2020). Used with permission.

A.   High value timber

Several species of trees are illegally logged for timber, in contravention of Nigeria's forestry regulations. Most notable from a wildlife crime perspective are the "rosewoods," a trade term for a wide range of tropical hardwoods, not a botanical category, which describes species with a reddish-hued timber. This situational analysis will focus on rosewood as it is the number one wildlife crime related commodity globally. This wood is in high demand for luxury furniture, particularly in China and South-East Asia. These woods are called "red wood" in China ("*hongmu*" in Mandarin), and have a high market value, driven by demand from a growing middle class.

Hongmu officially consists of 29 species, four of which originate from Africa: a) *Pterocarpus erinaceus*, an endangered species, listed in CITES Appendix II, native to Sahelian West Africa, including Nigeria; b) *Diospyros crassiflora*, a vulnerable species, not listed by CITES, this is a lowland rainforest species endemic to West and Central Africa including Nigeria; c) *Dalbergia melanoxylon*, a Near Threatened species, listed in CITES Appendix II, a wide ranging dry savanna species growing across much of sub-Saharan Africa; and d) *Millettia laurentii*, an endangered species, not listed by CITES, found in Central Africa. Most of the research into illegal high value timber trade from Africa has been about *P. erinaceus*, due to its' being the most commonly

traded of the species. Having decimated rosewood forests in South-East Asia, criminals began focusing on Africa for new supplies of rosewood. Illegal logging of *P. erinaceus* (locally referred to as *Kosso*) from Africa is now one of the most profitable wildlife crimes, and the largest trade based on seizure records.[28]

Much of the flow of *Kosso* from West Africa to Asia was described as illegally sourced, since most countries of origin had imposed domestic bans on harvest or export. The UNODC World Wildlife Crime Report 2020[29] provides detailed assessments of the sourcing, known trafficking methods and routes for rosewood; therefore this information is not repeated here. However, of relevance to the National Strategy is the fact that Nigeria has been at the heart of the international trade in unsustainably harvested rosewood logs from Africa, and how corruption risks, implementation challenges, and fraudulent documentation have allowed this illegal wildlife trade to thrive.

Despite only entering the rosewood market in 2012, Nigeria has transformed from a net importer of logs into the world's largest exporter of rosewood logs, and one of the largest wood exporters on the continent. In 2016, *P. erinaceas* was listed in CITES Appendix II, effective early 2017. In that same year, Asian countries imported about 1.4 million m³ of rosewood (a lot of it presumably *Kosso*) from West Africa, of which 58 per cent came from Nigeria and 99 per cent went to China. Because the reported trade volumes were so large and a marked increase from previous years, a mission was undertaken held by the CITES Secretariat to Nigeria in May 2018, to evaluate the bases for these permits. It was found that the timber might have been obtained in accordance with national law, but it was not in accordance with the Convention. The CITES Secretariat pointed to the absence of recent scientific studies to estimate the level of sustainable harvest. Questions were also raised about the manner in which 4,000 permits were issued retrospectively.[29] These irregularities resulted in Nigeria being subjected to trade suspensions under CITES Article XIII.[30]

Nigerian authorities are making concerted efforts to address the illegal timber trade, such as through renewed efforts to enforce the ban on trade in timber (restated in July 2020) and an increased effort to monitor the loading of containers before they reach the ports. Since the imposition of a CITES rosewood export ban from Nigeria in November 2020, there has been no evidence of ongoing exports to consumer countries of *P. erinaceus*, but the felling of trees is ongoing. Fieldwork reports suggest that traders are switching to exporting *Afzelia africana* and that *P. erianceus* logs are piling up at cutting sites.[31] Such a switch in species is a typical response of wildlife crime perpetrators to increased enforcement and does not bode well for the future of *A. africana*. The criminals are also likely to shift operations, as they have done with pangolins and ivory before, potentially shipping *P. erinaceous* from different ports. Therefore, effort must be made to ensure that not only does Nigeria cease to be a haven for timber trade because it tightens controls, but systems need to be put in place to ensure that traffickers do not simply switch to other countries or species.

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28 UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

29 Environmental Investigation Agency, "The Rosewood Racket: China's billion dollar illegal timber trade and the devastation of Nigeria's forests," 2017.

30 Article XIII https://cites.org/eng/disc/text.php#XIII

31 UNODC fieldwork

B.   Ivory

Africa saw a decline of over 111,000 elephants (both *Loxodonta Africana* and *Loxodonta cyclotis*) between 2005 and 2015, during which time West and Central Africa collectively lost more than half of their elephant populations. The Nigerian elephant population was not spared, and a once widespread group comprising both savanna and forest elephants (Endangered and Critically Endangered respectively) is now a fraction of what it once was. The International Union for Conservation of Nature (IUCN) 2016 African Elephant Status Report estimated the country's remaining population at somewhere between 169 and 463.[32] Poaching has been largely to blame for the loss of Nigeria's elephants. The population in Yankari National Park, the stronghold of Nigerian savanna elephants (*L. africana*), was decimated between 2006 and 2015, from 350 elephants to a current estimate of only about 100 individuals.[33] Scattered in isolated populations, savanna elephants may still occur around Kwiambana Game Reserve and Kamuku National Park in Northern Nigeria, while smaller populations of forest elephants (*L. cyclotis*) can be found in the Omo Forest Reserve, Okomu National Park, and Cross River National Park in southern Nigeria. There may still be small migratory groups of elephants that move in and out of Nigeria from Niger and Cameroon.

The UNODC-International Consortium on Combating Wildlife Crime (ICCWC)[34] Risk Assessment for West Africa[35] and the UNODC World Wildlife Crime Report 2020[36] provide detailed assessments of the sourcing, known trafficking methods and routes for ivory. However, of relevance to the National Strategy is the fact that Nigeria is the primary exit point for ivory trafficked from Africa to Asia. African elephants are listed in CITES Appendix I (except for the Botswana, Namibia, South Africa and Zimbabwe populations, which are listed in CITES Appendix II). All commercial international trade in the ivory of African elephants is currently prohibited under CITES. Despite the total ban, Nigeria-linked ivory seizures totaled 5,629 kgs between 2009–2011, 11,769 kgs between 2012-2014, and 12,211 kgs in the period 2015–2017.[37] More recently, a seizure in January 2021[38] at the Apapa Port contained 2,772 pieces of elephant tusks, weighing 4,752 kgs. In July 2021, three suspects were arrested with 196 sacks seized, amongst which were 888.5 kgs of ivory.[39] Then in September, 25 kgs of ivory was seized.

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32   Thouless et al., "African Elephant Status Report 2016," Occasional Paper Series of the IUCN Species Survival Commission 60 (2016).

33   Unah, "Satellite Collars to Help Boost Protection for Nigeria's Largest Remaining Elephant Herd" (Mongabay, October 25, 2019), https://news.mongabay.com/2019/10/satellite-collars-to-help-boost-protection-for-nigerias-largest-remaining-elephant-herd/

34   The International Consortium on Combating Wildlife and Forest Crime (ICCWC) is a partnership between five inter-governmental organizations working to strengthen criminal justice systems and provide coordinated support at national, regional and international level. The Consortium is comprised of the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the International Criminal Police Organization (INTERPOL), UNODC, the World Bank and the World Customs Organization (WCO). https://cites.org/eng/prog

35   CITES UNODC, "West and Central Africa Wildlife Crime Threat Assessment," CoP18 Doc. 34 Annex 4, 2019.

36   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

37   UNODC, "West and Central Africa Wildlife Crime Threat Assessment."

38   https://www.unodc.org/nigeria/en/wildlife-trafficking-through-nigerian-ports-continues-despite-covid-19.html

39   https://wildlifejustice.org/joint-operation-with-nigeria-customs-service-leads-to-three-arrests-and-seizure-of-7-1-tonnes-of-pangolin-scales/

Nigeria has become the key country in the consolidation, packing, sale and export of ivory to Asian markets. Ivory is predominantly sourced from countries across West and Central Africa, and although some is sold into local markets, most of it is exported, predominantly to Viet Nam and China.[40]

CITES has classified Nigeria as Category A, which consists of Parties most affected by the illegal trade in ivory. Nigeria developed a National Ivory Action Plan (NIAP) in 2015,[41] which was updated in 2020,[42] and in 2018, Nigeria joined the Elephant Protection Initiative (EPI). There have been some successes, such as the identification of key populations, and zero elephant poaching reported in the Yankari population since 2015. However, several other key performance indicators show no progress; no legislative or regulatory measures have been introduced to close the domestic ivory market, and despite significant seizures, there have been limited successful prosecutions of individuals involved in the ivory trade.[43] Nigeria will aim to provide measurable and verifiable outcomes as part of the NIAP progress reports. Recent seizures show progress in detection, arrest and investigation, but effective prosecution remains to be seen.

C.   Pangolin scales

Pangolins have been used for hundreds of years for subsistence, livelihood, medicinal, and cultural purposes. Limited quantitative information about population sizes and trends is available, which makes assessments of pangolin conservation status difficult. There are four species of concern in Africa, three of which have been recorded in Nigeria: the black-bellied pangolin (*Phataginus tetradactyla* – Vulnerable), the white-bellied pangolin (*Phataginus tricuspis* – Endangered), and the giant pangolin (*Smutsia gigantea* – Endangered). The distribution of *S. gigantea* in Nigeria is unclear, but it may occur in the South and was camera-trapped in Gashaka Gumti National Park in 2016.[44] The fourth African species is Temminck's ground pangolin (*Smutsia temminckii* – Vulnerable), which is widespread across Southern and Eastern Africa, but is not known to range in Nigeria.

Pangolins are consumed as bushmeat and their body parts are used in a wide range of ethno-pharmacological applications. Both these markets have a negative impact on the sustainability of pangolin populations. However, it is the international trade in scales that has made pangolins the most trafficked species globally. Historically, the demand for pangolin products in Asia was met by local supply or from countries within the region. As Asian pangolin populations have decreased, evidence suggests that Asian demand is, in large part, now being met by African pangolins.[45]

40   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

41   Federal Ministry of Environment and Department of Forestry, "National Ivory Action Plan for Nigeria," 2015, https://cites.org/sites/default/files/common/prog/niaps/Nigeria_NIAP.pdf

42   https://cites.org/eng/prog/niaps/parties_of_primary_concern_niaps

43   Jayanathan. Combating Wildlife Crime in Nigeria: An Analysis of the Criminal Justice Legislative Framework. (2021)

44   Nixon, Unpublished Data. from IUCN- Redlist Giant Pangolin (Smutsia Gigantea)," https://www.iucnredlist.org/species/12762/123584478

45   Gomez et al. "The Trade of African Pangolins to Asia: A Brief Case Study of Pangolin Shipments from Nigeria," Traffic Bulletin 28, no. 1 (2016): 3–5.

The UNODC-ICCWC Risk Assessment for West Africa[46] and the UNODC World Wildlife Crime Report 2020[36] provide detailed assessments of the sourcing, known trafficking methods and routes for trade of pangolin products. However, of relevance to the National Strategy is the fact that Nigeria has been implicated in much of the trade of pangolins from Africa. In 2016, all pangolin species were listed in CITES Appendix I, effective early 2017 and CITES implemented a total ban on the international trade in wild-caught pangolins for commercial purposes. However, in 2019 alone, at least 51 tonnes of pangolin scales were seized across the world, originating from Nigerian ports, compared to only 2 tonnes in 2015.[37] In July 2021, there was a seizure in Nigeria containing 7,137 kgs of pangolin scales and 4.6 kgs of pangolin claws, and in September 2021 another 1 tonne of pangolin scales and 5 kgs of pangolin claws were confiscated.[40]

DNA evidence of seized pangolin scales revealed that African pangolins were hunted across large areas of their natural range and then delivered to a small number of trade transit hubs including Nigeria.[47] In 2019, more than half of all seizures of pangolin scales worldwide could be traced back to Nigeria. Like with elephant ivory, Nigeria has become a key country in the consolidation, packing, sale and export of pangolin scales to Asian markets. Ivory and scales have been found in the same shipments, demonstrating convergence between these two illicit wildlife products, sometimes utilising the same transport infrastructure and weaknesses in enforcement to facilitate transport by criminal syndicates. For example, some ivory traffickers have been recorded to be switching to pangolin trafficking which utilises the same infrastructure but is considered lower risk.[48]

D.   Charcoal

Regulation of fuelwood use and charcoal production is a difficult development challenge, one which needs to balance access to resources with the sustainability of environments. People require access to resources to live and develop; charcoal production provides a source of fuel and income to many vulnerable populations. However, the commercial overutilisation of Nigeria's forests for charcoal, in part, driven by criminal networks and lack of enforcement, has contributed to the degradation of forest habitats. The National Environmental Standards and Regulations Enforcement Agency (NESREA) enforces the provisions of the National Environmental (Control of Charcoal Production Export) Regulations 2014. The Regulation states that *"a person shall not undertake or engage in any undertaking or activity relating to commercial charcoal production or handling without a valid permit issued by the Federal or State Department of Forestry"*. The regulation also provides that, *"a person shall not be granted a permit for charcoal production without having a reforestation and rehabilitation plan for the area from where the charcoal will be derived or produced."*

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46   UNODC, "West and Central Africa Wildlife Crime Threat Assessment.", https://cites.org/sites/default/files/eng/prog/enforcement/E-CoP18-034-Threat-Assessment.pdf

47   Zhang et al., "Genetic Identification of African Pangolins and Their Origin in Illegal Trade," Global Ecology and Conservation 23 (2020): e01119.

48   UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species, Vienna 2020, https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html

There are limited examples where these regulations have been enforced; in April 2019 NESREA shut down one facility for the illegal production and exportation of charcoal in Nigeria, which was owned by a foreign company. However, the large-scale deforestation of Nigeria's secondary and primary forests for commercial production of charcoal for export continues. According to UN Comtrade, countries around the world reported importing more than $91 million worth of Nigerian charcoal in 2018 alone and more than $80 million worth in 2019, while Nigeria reported exporting just $4.5 million worth of charcoal in 2018, and about half that amount in 2019. In July 2020, Nigeria reinforced the ban on the export of timber and allied products, including charcoal. The effect of this on illegal wood harvesting remains to be formally quantified.

E. Illegal, unregulated and unreported (IUU) fishing and crimes in the fisheries sector

Although IUU is not often considered as part of wildlife crime or included in wildlife crime statistics, it provides a major threat to socio-economic development. In Africa's coastal waters, and particularly the Gulf of Guinea, IUU fishing has reached epidemic proportions. IUU fishing contributes significantly to global overfishing, threatening food security, and the sustainability of fisheries as well as negatively affecting coastal communities who lose the opportunities to catch, process and trade profitably from the fisheries within their waters.

IUU incidences are particularly relevant in Nigeria where a recent study estimated that Nigeria ranks third globally for the number of people dependent on coastal fisheries for food security.[49] Nigeria's vast inland water bodies and coastline, measuring over 800 kms, support nearly 1.5 million people engaged in fisheries-based livelihoods.[50]

IUU fishing is associated with other transnational organised crimes, such as drug trafficking, human trafficking, slavery, and arms smuggling.[51] In addition, a broad range of other crimes can occur at each stage of the fisheries value chain, including corruption, fraud, forgery and tax crimes (Figure 2).[52]

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49   Selig et al., "Mapping Global Human Dependence on Marine Ecosystems," Conservation Letters 12, no. 2 (2019): e12617.

50   Worldfish, "Worldfish in Nigeria," Factsheet 2017-17 (Penang: WorldFish, 2017).

51   Mackay et al. "The Intersection between Illegal Fishing, Crimes at Sea, and Social Well-Being," Frontiers in Marine Science 7 (2020): 863.

52   https://www.unodc.org/documents/Wildlife/UNODC_Approach_to_Crimes_in_the_Fisheries_Sector.pdf

Figure 2:
Illegality in the fisheries sector.
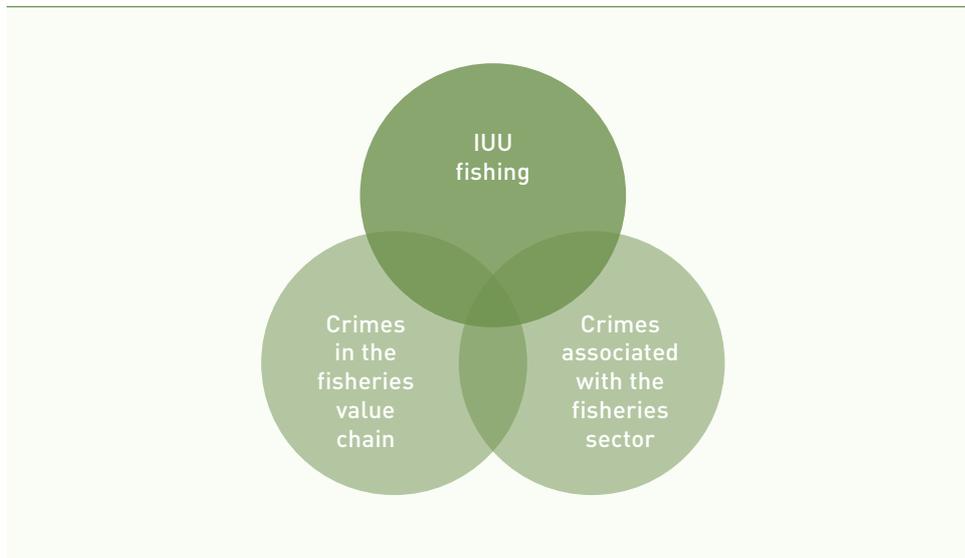
Source: UNODC document 'Approach to Crimes in the Fisheries Sector'. Used with permission.

The regional and national scale of IUU fishing is increasingly being documented; regional investigations showed that West Africa is a global hotspot.[53] There is ongoing Nigeria-specific research and information on the scale, modes of operation and the effect of IUU fishing and crimes in the fisheries sector, although there are generic trends and intelligence. The lack of specific local information has limited the strategic response of national agencies to the crisis. The absence of fishing seasons places increased pressure on fisheries; agreeing upon and implementing fishing seasons would increase production by providing respite for spawning and providing time for juvenile fish to mature.

The nexus of organised crime, weakened institutions, lack of capabilities and inadequate tools in enforcement agencies, corruption, and poverty drive and facilitate IUU fishing and crimes in both the inland and marine fisheries sector in Nigeria's waters. Combatting IUU fishing and crimes in the fisheries sector in Nigeria will require multi-agency collaboration and an integrated approach that develops capabilities across multiple agencies that are responsible for different stages of the fisheries value chain. When arrests are made of any vessel (domestic or foreign) that violate the law, prosecution is according to the Nigerian Sea Fisheries Act of 1992. However, this Act is outdated and doesn't reflect present-day challenges that did not exist in 1992, including IUU fishing and the need for a Vessel Monitoring System. An amendment to this Act is urgently required. For example, the wide range of criminal activities that support IUU fishing currently overstretch the available capability of the agencies enforcing fisheries regulations, which will need support to meet the challenge. In addition, the violations may only be detected at ports, border crossings, in the review of documents as part of international trade, or through monitoring systems (if present). The agency representatives most likely to see evidence of these violations are not fisheries or Navy officers but representatives of customs, health, and other border agencies that are not usually familiar with the nature and modus

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53   Daniels et al., "Western Africa's Missing Fish," London: Overseas Development Institute. Retrieved July 1 (2016): 2018.

operandi of IUU fishing and crimes in the fisheries sector. The mechanisms for prosecution, the jurisdictions and law enforcement options are further complicated when dealing with foreign vessels, international waters and transnational crime.[54]

A major focus of this National Strategy is the development of capabilities in the fisheries sector. Nigeria is lacking knowledge base and strategic insight on IUU fishing and crimes in the fisheries sector. As such, much of this initial National Strategy is focused on understanding the drivers, enabling conditions and elucidating the mechanisms by which IUU fishing and crimes in the fisheries sector operate in Nigeria. In addition to developing the knowledge base, the National Strategy will focus on legal reviews, and putting in place the governance and collaboration structures necessary to begin to effectively combat IUU fishing and crimes in the fisheries sector. Given the connections between the various crimes involving wildlife – both terrestrial and marine – and the different sets of stakeholders involved, including some overlapping, convening a Fisheries Taskforce will be critical for a coordinated response to IUU fishing and crimes in the fisheries sector.

F.   Domestic illegal wildlife trade

The examples listed above are not exhaustive and wildlife crime in Nigeria is by no means a purely international challenge. Wildlife (including plants and their derivatives) are exploited to meet demands in illegal markets that are both domestic and international. Market assessments have shown dozens of species are illegally traded in the local markets, for traditional medicine and food, often with little sanction. For example, despite the Nigerian Endangered Species Control Act, 2016, the Critically Endangered hooded vulture (*Necrosyrtes monachus*), the Endangered lappet-faced vulture (*Torgos tracheliotos*), the Critically Endangered white backed vulture (*Gyps africanus*), and the Endangered Egyptian vulture (*Neophron percnopterus*), all of which are in dramatic decline across the region, have been found to be openly traded in Nigerian markets. Importantly, the domestic and international markets fuel one another, and wildlife crime perpetrators will exploit the people and infrastructure available within the domestic markets to illegally traffic larger volumes or key high-value species internationally. To meet its conservation objectives, Nigeria will need to tackle both unsustainable domestic consumption of wildlife, and domestic illegal trade, as well as international trafficking.

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54   INTERPOL, "Study on Fisheries crime in the West African coastal region" (Environmental Security subdirectorate, 2014).
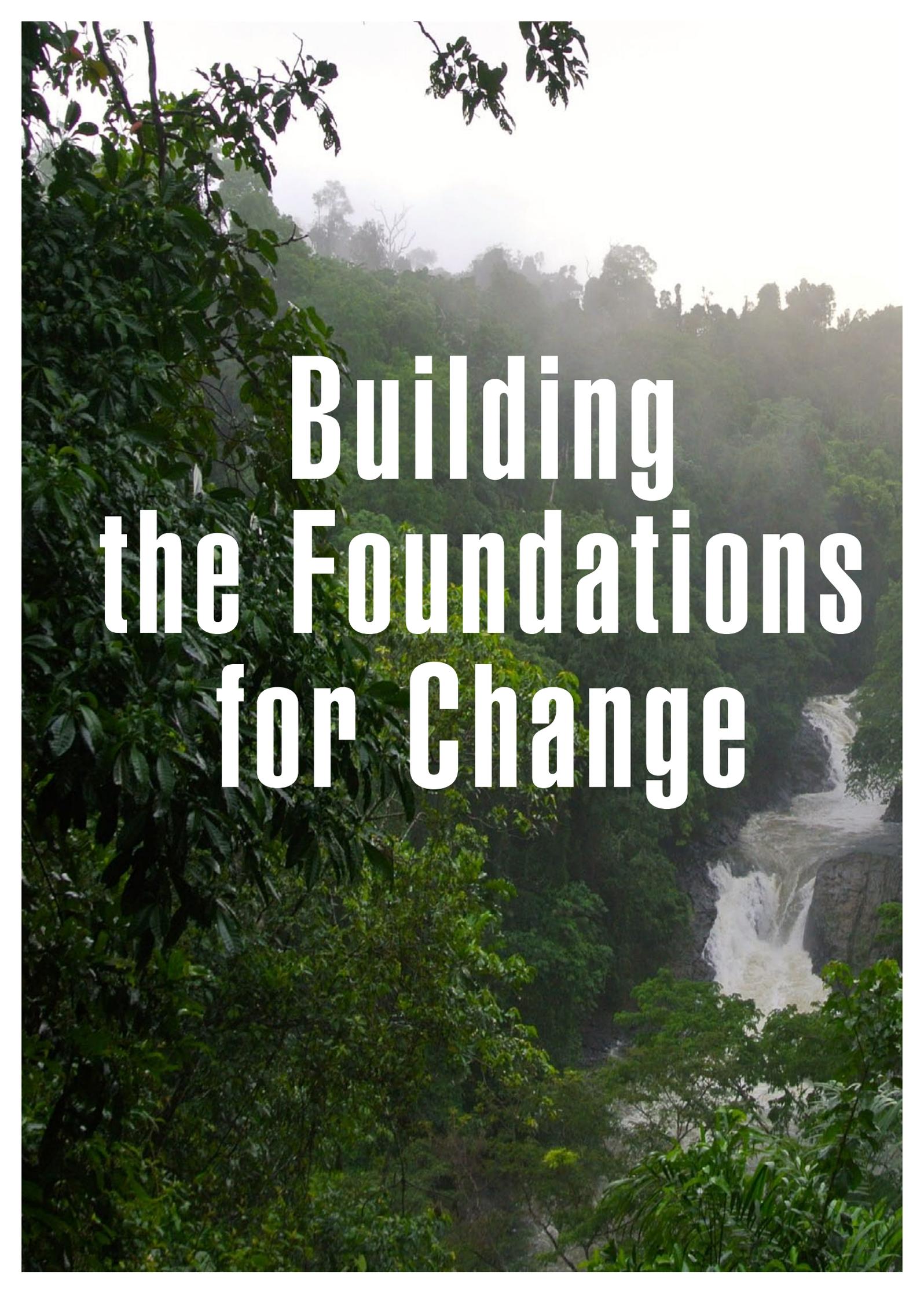
Building the Foundations for Change

The drivers of wildlife crime vary widely. The major drivers and enabling conditions were identified through the SWOT analysis (Appendix 1), in the stakeholder engagement workshop, and during the partner interviews. These are discussed in the introduction and situational analysis of this document. While by no means exhaustive, they serve to illustrate the scale and complexity of the challenge ahead in addressing wildlife crime in Nigeria. To generate systemic change, there is a need to go beyond addressing enforcement challenges: Nigeria needs to reduce the pressures, and remove the enabling conditions that allow wildlife crime to flourish.

The solutions to these identified drivers are far from simple; in fact, wildlife crime is a "wicked problem."[55] Wicked problems are characterised by being difficult to solve. In this instance, this is due to the global scale and adaptability of organised crime networks involved in wildlife crime, and the interconnected nature of wildlife crime with other factors. For example, addressing local poverty or providing alternative livelihoods only will not prevent wildlife crime; greed, criminality, cultural practice, opportunism, and other incentives will continue to drive illicit trade. At a national institutional level, inconsistent laws and regulations, or a weak legal framework to tackle wildlife crime leave countries vulnerable to exploitation. In addition, insufficient law enforcement capacity, limited detection and reporting of wildlife crime, weak governance, corruption risks, or a lack of coordination across the organisations that comprise the enforcement chain (Figure 3) further exacerbates the effectiveness of law enforcement actions.

Figure 3:
The enforcement chain summarises the multiple points on the spectrum where law enforcement interventions can take place to address wildlife crime.
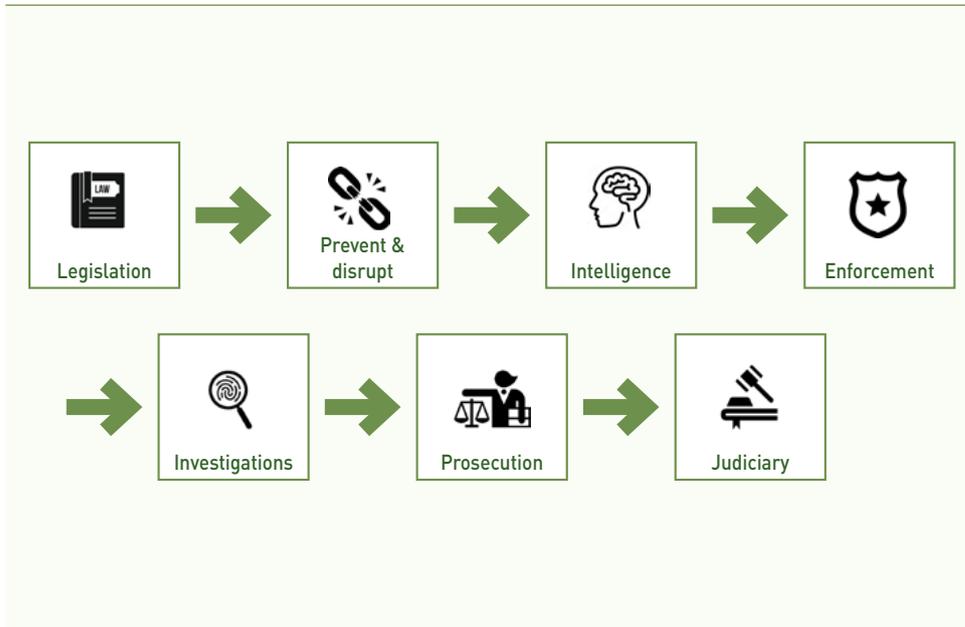
Source: developed during the Workshop.

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55   Spapens and Huisman, "Tackling Cross-Border Environmental Crime," Environmental Crime in Transnational Context; Spapens, T., White, R., Huisman, W., Eds, 2016, 27–42.

Wicked problems cannot simply be "fixed". Rather, agents of change can mitigate the negative consequences and position the broad trajectory of wildlife crime in new and more desirable directions. This demands a desire for change, interdisciplinary collaboration, and perseverance. Generating impact takes time, even more so when attempting to tackle wicked problems. Wildlife crime will never be completely eradicated, but the systems and capabilities to tackle wildlife crime can be put in place. Although achieving this will take longer than the time frame of this first National Strategy, it does provide a set of key **Foundations for Change** that need to be laid for long-term change in preventing and addressing wildlife crime in Nigeria.

Figure 4:
The National Strategy to Combat Wildlife and Forest Crime in Nigeria is based upon seven foundations for change.
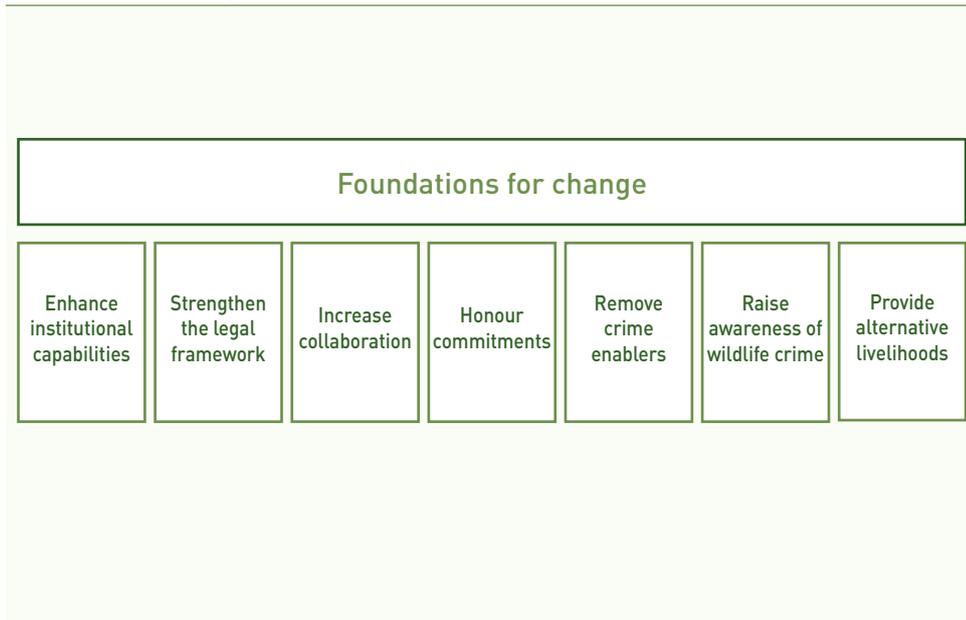
Foundations for change						
Enhance institutional capabilities	Strengthen the legal framework	Increase collaboration	Honour commitments	Remove crime enablers	Raise awareness of wildlife crime	Provide alternative livelihoods

Source: developed during the Workshop.

Strategy

Strategic vision

A vision statement is the anchor of any strategic plan. It outlines what an organisation or group would like to ultimately achieve – a desired state. The strategic vision sets out an ambitious direction for Nigeria, which is:

A Nigeria Free of Wildlife Crime

Strategic goal

A strategic goal aims to set a realistic target to be achieved at the end of the five-year strategy, based on the various interventions delivered under each theme. The strategic goal allows one to assess progress towards the strategic vision. Ideally, the strategic goal should be SMART,[56] but setting goals requires an established baseline. However, there are limitations on the current knowledge of the status of wildlife crime for Nigeria. Identifying Key Performance Indicators (KPIs) and establishing baseline data must be an initial priority for the National Strategy. However, these current limitations mean that the strategic goal for the National Strategy must be pragmatic.

The situational analysis and SWOT analysis both highlight the scale of the wildlife crime challenge in Nigeria and the current capabilities in the country to address this challenge. Achieving this ambitious vision will likely require multiple five-year strategies; the 2022–2026 National Strategy needs to progress towards this vision by providing the foundations for change. Combatting and reducing wildlife crime first requires the enabling foundations so that all the key stakeholders have the capabilities and frameworks to understand, detect and deter wildlife crime, enforce the law and effectively sanction criminals. Importantly, there needs to be a collaborative approach so that all stakeholders are moving towards the same shared vision.

Thus, the strategy has defined the following goal:

By 2026, Nigeria has made demonstrable progress in reducing wildlife crime, while its law enforcement and criminal justice system has the requisite capabilities and a fit-for-purpose legal framework to effectively and collaboratively tackle wildlife crime.

While the strategic goal does not meet all the definitions of a SMART target, by being pragmatic and focusing on the building blocks for long-term success, it is realistic. It can be measured by conducting national assessments of capacity and analysing the effectiveness of the legal framework at both the beginning and end of the National Strategy period. Tools such as the ICCWC Indicator Framework[57] could be valuable for providing a holistic assessment of Nigeria's capabilities to address wildlife crime. A comprehensive assessment of the preventive and criminal justice responses to wildlife crime using the ICCWC Wildlife and Forest Crime Analytic Toolkit

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56   Specific, Measurable, Attainable, Realistic, Timebound
57   https://www.unodc.org/unodc/en/wildlife-and-forest-crime/wildlife-and-forest-crime-analytic-toolkit.html

and Indicator Framework will start in 2022, while an analysis of the criminal justice legislative framework has been conducted by the Environmental Investigation Agency (EIA). These would act as appropriate indicators for the strategic goal.

Strategic objectives

The National Strategy requires clearly defined parameters and objectives to guide the implementation and provide focus in achieving the vision and strategic goal. Setting parameters allows all stakeholders to understand the scope within which they will be operating.

The scope of the National Strategy should include interventions:

    a) to tackle transnational and domestic wildlife crime
    b) to tackle marine, freshwater and terrestrial wildlife crime
    c) with the transport and financial sector

With the parameters defined, the development process identified key themes of interventions for working towards the vision and strategic goal. Based on these themes, seven strategic objectives were defined:

1. **Enhance institutional capabilities:**
    Develop the capabilities in all relevant institutions to drive evidence-based action to understand, detect and deter wildlife crime, enforce the law and sanction those involved in wildlife crime.

2. **Strengthen the legal framework:**
    Enable legal and sustainable trade, protect Nigeria's fauna and flora, and deter wildlife crime through a harmonised and strengthened legal framework.

3. **Increase collaboration:**
    Ensure strong coordination, led by accountable partners, to facilitate national and international collaboration and information sharing between all relevant stakeholders to combat wildlife crime.

4. **Honour commitments:**
    Ensure compliance with national and international commitments to regulate legal trade and combat wildlife crime.

5. **Remove enablers of crime:**
    Tackle corruption risks and prevent financial crime from enabling wildlife crime.

6. **Raise awareness of wildlife crime:**
   Generate social and political will by raising awareness in all stakeholders as to the value of nature and the threat of wildlife crime.

7. **Provide alternative livelihoods:**
   Empower local communities through developing wildlife crime prevention initiatives and alternative livelihoods.

Importantly, these strategic objectives all provide the necessary foundations for change. By achieving these objectives, Nigeria will have the commitment, necessary structures and capabilities to effectively address both transnational and domestic wildlife crime. They are discussed further below.

Wildlife crime is a dynamic and complex problem which requires multiple stakeholders to work together at each stage of the wildlife crime continuum, informed by the best available evidence and information, to detect, deter and prevent wildlife crime, enforce the law and mete out appropriate deterrent sanctions. It will be fundamental to **enhance institutional capabilities** of all the key stakeholders, so they are capable of performing their role within the larger system. Capabilities refer to an organisation's ability to perform a particular task or function, and represent the organisation's capacity to deploy resources that have been purposely integrated to achieve a desired end state. Capabilities require both the necessary capacity (the resources available to perform a task) and competences (the skills and knowledge of the personnel to perform their role within the task).

Even if the stakeholders have the necessary capabilities to detect and charge wildlife crime perpetrators, wildlife crime needs to be elevated as a serious crime. By **strengthening the legal framework**, Nigeria can ensure successful and fair prosecution of wildlife crime perpetrators, resulting in severe, swift and certain sanctions that deter criminals. The recent analysis of the criminal justice legislative framework concluded that the best laws for prosecuting cases involving large-scale seizures are to be found in customs and money-laundering laws, rather than in wildlife-specific laws. Strengthening the legal framework can increase the severity of wildlife-specific laws and elevate the status of wildlife crime.

The Federal Department of Forestry, under the Federal Ministry of Environment, shall act as the lead agency for implementation of the National Strategy, and over 70 different stakeholder groups have been identified as contributing actors, to varying degrees, to address this issue. Implementing the National Strategy will require these stakeholders, or subsets of these stakeholders, to pull together towards the shared vision. Failure to coordinate and collaborate will negatively impact the fight against wildlife crime even if the institutions have the requisite capabilities and operate under a strong legal framework. **Increasing collaboration** and coordination of all stakeholders, under the guidance and direction of the identified lead agencies, will facilitate the implementation of the Action Plan and ensure effective and proactive information and intelligence sharing (where appropriate) to prevent and combat wildlife crime. By ensuring effective collaboration, Nigeria can benefit from the collective strengths and experience of all the stakeholders and improve harmonisation between federal and state actors.

To elevate the status of wildlife crime as a serious crime, Nigeria must adhere to its various national and international commitments related to legal trade and wildlife crime. **Honouring these commitments** is a clear demonstration of Nigeria's willingness to tackle wildlife crime as an enabling condition for success. As an example, Nigeria is currently subject to trade suspensions under CITES Article XIII.[58] Nigeria can honour its commitments and resume trade in those species by fully resolving the outstanding recommendations regarding: a) management of trade in specimens of *Pterocarpus erinaceus*; b) legislation and law enforcement; c) issuance of export permits and information systems; and d) management and disposal of seized stockpiles. Effective disposal of seized stockpiles will be an important step to prevent leakage back into illegal markets. Furthermore, Nigeria should commit adequate financial and manpower resources to addressing wildlife crime, demonstrating that wildlife crime is taken seriously.

It is important to make it difficult for criminals to commit wildlife crime. The introduction highlighted how corruption is a challenge associated with wildlife crime. By tackling corruption risks and targeting the financial flows that emanate from wildlife crime, one can reduce the opportunity for wildlife crime. Taking proactive steps through targeted interventions to **remove these enablers of crime** will both provide an enabling environment for the agencies to effectively tackle wildlife crime, and will aid in preventing wildlife crime in itself.

Given the scale of the challenge, Nigeria will need political and social willingness and commitment to enable success. **Raising awareness of wildlife crime** at all levels can facilitate this willingness and commitment to change. There needs to be strong messaging and education of the value of nature and the foundations that nature provides for long-term societal and economic development. Without nature, Nigeria's efforts to develop will ultimately fail. Nigeria's leaders, the relevant organisations and society at large must understand that wildlife crime is a major driver of biodiversity loss, and that this erosion of nature compromises Nigeria's future success. In addition, there are negative social, political and economic impact in being a major player in the illegal wildlife trade. As a transit country, the environmental impact of wildlife crime goes beyond Nigeria's borders. There needs to be clear messaging around the role of wildlife crime in facilitating corruption and other crimes. Only then will the status of wildlife crime be elevated as a priority, engaging everyone to prevent wildlife crime.

For many perpetrators of wildlife crime in Nigeria, their role might be borne out of a necessity to survive. Wildlife and forest products may either represent a source of food or a source of revenue for the family. **Providing alternative livelihoods** can empower local communities, providing financial resilience so that individuals do not need to engage in wildlife crime predominantly because they have alternative revenue sources, but also because they no longer have the time to engage in illicit activities. In a country the size of Nigeria, reducing the need to commit wildlife crime is an enormous task that goes well beyond the remit of the stakeholders engaged in tackling wildlife crime. This objective talks to sustainable social development at a national level, a vision far beyond the scale of the National Strategy. However, it may benefit from implementing interventions to develop alternative livelihoods in certain target communities that provide a greater threat to wildlife crime. On a larger scale, it would be

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58   Article XIII https://cites.org/eng/disc/text.php#XIII

invaluable to get buy-in from the Federal Government so that the National Strategy feeds into the national development agenda.

Strategy implementation

Partner roles

The Federal Department of Forestry, under the Federal Ministry of Environment, shall act as the lead agency for implementation of the National Strategy. However, implementing it will require a collective and collaborative effort of many stakeholders, pulling together to deliver on interventions within their mandate and expertise. Having a collaborative approach ensures Nigeria can draw on the strengths of many partners. The partner meetings identified over 70 partners and stakeholders (Figure 5) that have some role to play (in varying degrees) in implementing the National Strategy, broadly categorised within various themes of stakeholders. It is important to note, that Figure 5 is not a list of stakeholders engaged in developing this Nigerian National Strategy, but rather provides a list of the stakeholders that will likely have a role (to varying degrees) in implementing the strategy.

Some partners will have significant roles to play in the implementation of the National Strategy, potentially leading on certain interventions, while other partners might have a small but important role to play. For example, the Nigerian Customs Service might lead on the enforcement at international borders (air, land and sea), but they might be supported by other key stakeholders including NESREA, Nigeria Immigration Service, Nigeria Agriculture and Quarantine Service, the Nigeria Police Force and INTERPOL, the World Customs Organization, UNODC and the Nigerian Postal Service and the courier companies.

Given the number of partners and stakeholders, a stakeholder mapping exercise (Figure 6) was conducted to emphasise the overlap between partners, to highlight the importance of collaboration, and to outline the roles of each key stakeholder. Defining the roles and responsibilities of each of the partners will prevent conflict and implementation challenges. This exercise considered the multiple intervention points along the spectrum of wildlife crime, and the different geographies where interventions occur.

Figure 5:
Partners and stakeholders with roles to play in implementing the National Strategy to Combat Wildlife and Forest Crime in Nigeria, 2022–2026.

Partners and stakeholders

Lead Agency
Federal Department of Forestry, Federal Ministry of Environment

Ministries and Government
- Federal Ministry of Agriculture and Rural Development
- Federal Ministry of Education
- Federal Ministry of Finance, Budget and National Planning
- Federal Ministry of Foreign Affairs
- Federal Ministry of Industry, Trade and Investments
- Federal Ministry of Information and Culture
- Federal Ministry of Justice
- National Council of State
- Nigerian Governors Forum
- Abuja Environmental Protection Board (AEPB)

Legislative Actors
- Senate Committee on the Environment
- Senate Committee on Ecology and Climate Change
- House of Representatives Committee on the Environment

Agencies and Departments
- Federal Department of Fisheries and Aquaculture
- State Departments of Forestry
- National Boundary Commission
- Nigerian Maritime Administration and Safety Agency (NIMASA)
- National Orientation Agency (NOA)
- Border Communities Development Agency

Law Enforcement Agencies
- Nigeria Customs Service (NCS)
- Nigeria Immigration Service
- National Environmental Standards and Regulations Enforcement Agency (NESREA)
- National Park Service (NPS)
- Department of State Security (DSS)
- Nigeria Police Force
- Nigeria Civil Defence
- INTERPOL
- World Customs Organization (WCO)
- Nigeria Financial Intelligence Unit (NFIU)
- Economic and Financial Crimes Commission (EFCC)
- Independent Corrupt Practices Commission

Financial Sector
- Central Bank of Nigeria

Legal System
- Attorney General of the Federation (AGF)
- Chief Judge of the Federal High Court
- Attorney General of state in respect of crimes against state laws
- Director of Public prosecutions,
- National Judicial Institute
- Prosecutors and Judiciary in key states

Transport Sector
- Aviation Industry
- Courier Services
- Federal Airports Authority of Nigeria
- Nigerian Agricultural Quarantine Services (NAQS)

Source: developed during the Workshop.

- Nigerian Port Authority
- National Export and Import Association
- Nigeria Postal Service
- Shipping Companies

Natural Resource Use Sector
- Nigeria Export Promotion Council
- Association of Charcoal Exporter of Nigeria (ACEN)
- Association of Timber Dealers
- Bushmeat Marketeers
- Forestry Association of Nigeria
- Hunters Association
- Independent National Association of Nigerian Traditional Medicine Practitioners
- Processed Wood Producers and Marketers Association of Nigeria (PROWPMAN)
- Tropical Wood Exporters Association of Nigeria (TWEAN)
- Wildlife Traders Association

Research Sector
- AP Leventis Ornithological Research Institute (APLORI)
- Forestry Research Institute of Nigeria (FRIN)
- National Institute of Freshwater Fishery Research (NIFFR)
- National Institute of Oceanography and Marine Research (NIOMR)
- Raw Materials Research and Development Council (RMRDC)
- University of Abuja

Regional Partners
- ECOWAS Commission
- Gulf of Guinea Fisheries Committee of West African Countries (FCWAC)

Intergovernmental Partners
- CITES Secreteriat
- Food and Agriculture Organisation (FAO)
- International Consortium for Combating Wildlife Crime (ICCWC)
- United Nations Office of Drugs and Crime (UNODC)
- World Bank Group (WBG)

Bilateral Partners
- Federal Foreign Office of Germany
- British High Commission
- International Narcotics and Law Enforcement Affairs (INL)
- UK Border Force
- United States Agency for International Development (USAid)
- US Fish and Wildlife Service (USFWS)

Non-Governmental Organisations
- Africa Nature Investors Foundation
- Birdlife
- Born Free USA
- EAGLE-LAGA network
- Egmont Centre of Financial Intelligence Units (ECOFEL)
- Environmental Investigation Agency (EIA)
- Focused Conservation Solutions (FCS)
- Nigeria Conservation Foundation
- Pangolin Conservation Guild Nigeria (PCGN)
- Royal United Services Institute (RUSI)
- United for Wildlife
- Wildlife Conservation Society (WCS)
- WildAid

Figure 6:
Mapping exercise, conducted during the National Strategy workshop, to highlight the importance of collaboration, and to outline what roles each key stakeholder performs along the enforcement chain and at different geographies.

		Legislation	Prevent & disrupt	Intelligence
Domestic Supply	• NPs • FRs • Community • Private • Marine • Freshwater	• National Assembly • Executive Order • Ministry of Justice • Ministry of Environment • State Dept of Forestry • NIMASA • NGOs	• NPS • NCS • State Department of Forestry • Communities • Police • Navy • NIMASA • NSCDC • Army • Marine Police • Marine Customs • Federal Department of Fisheries	• NPS • NCS • State Department of Forestry • Communities • Police • DSS • Navy • NIMASA • NSCDC • Army • Marine Police • Marine Customs • Federal Department of Fisheries
Intermediaries / Transit / Domestic Demand		• National Assembly • Executive Order • Ministry of Justice • Ministry of Environment • NGOs	• NCS • NESREA • NAQS • NPS	• NCS • NESREA • NPS • NAQS • DSS • NiPost • Courier Services • Communities • NGOs • Informants
Borders	• Land • Air • Sea	• National Assembly • Executive Order • Ministry of Justice • Ministry of Environment • NCS • NESREA • FAAN • NPA • NIMASA • Nigeria Immigration Service • NGOs	• NCS • NESREA • Nigeria Immigration Service • Ministry of Environment • Nipost • NAQS • Nigeria Police • Interpol • EFCC • NFIU • FAAN • NPA • NIMASA	• NCS • NESREA • Nigeria Immigration Service • Ministry of Environment • NiPost • NAQS • Nigeria Police • DSS • Interpol • EFCC • NFIU • ICTC • FAAN • NPA • NGOs
International Supply and Demand		• Interpol • WCO • CITES		• Interpol • UNODC • WCO

Source: developed during the Workshop.

	Enforcement	Investigations	Prosecution	Judiciary
	- NPS - NCS - State Department of Forestry - Communities - Police - DSS - Navy - NIMASA - NSCDC - Army - Marine Police - Marine Customs - Federal Department of Fisheries	- NPS - NCS - Police - Navy - NIMASA - NSCDC - Army - Marine Police - Marine Customs	- NPS - NCS - Police - Navy - NIMASA - NSCDC - Army - Marine Police - Marine Customs	- Federal High Court - Magistrate Court - Area Court - Community Chiefs - Ministry of Justice
	- NCS - NESREA - NAQS - NPS	- NCS - NESREA - NAQS - NPS - EFCC - NFIU	- NCS - NESREA - NAQS - NPS	- Federal High Court - Magistrate Court - Area Court - Community Chiefs - Ministry of Justice
	- NCS - NESREA - Nigeria Immigration Service - Ministry of Environment - Nipost - NAQS - Nigeria Police - Interpol - EFCC - NFIU	- NCS - NESREA - Nigeria Immigration Service - Ministry of Environment - Nigeria Police - Interpol - EFCC - NFIU	- NCS - NESREA - Ministry of Environment - Ministry of Justice - Interpol - EFCC - NFIU	- Federal High Court - Magistrate Court - Ministry of Justice
	- Interpol - UNODC - WCO			

Implementation coordination

The National Strategy is ambitious, requiring significant collaboration between federal and state agencies, NGOs and the international community. Critically, there needs to be cooperation and trust among the key agencies, operating with clear mandates. The National Strategy requires strong leadership with the authority to drive implementation and bring all the partners together towards a shared vision. The Federal Department of Forestry, under the Federal Ministry of Environment, is the clear lead authority for this National Strategy, but there will be components of implementing this National Strategy that require additional designated leads. For example, strengthening the legal framework will require significant involvement from the Federal Ministry of Justice. The strategy framework has a list of identified lead actors for each output; those lead actors will be expected to identify all other relevant partners for that output, engaging those partners to support the various activities. As an initial action, once the National Strategy is finalised, it would be important to identify lead agencies and KPIs for each activity to drive implementation and ensure that progress can be closely monitored.

Coordination, cooperation and collaboration between all the partners will be critical to the successful implementation of the National Strategy. These are all well-established points in a continuum of engagement (Figure 7).

Figure 7:
The continuum of engagement.

Networking	Coordinating	Cooperating	Collaborating	Integrating
Exchanging information for mutual benefit	In addition, altering activities to achieve a common purpose	In addition, sharing resources (e.g. staff, finances, space, equipment)	In addition, learning from each other to enhance each other's capacity for mutual benefit and a common purpose	Completely merging operations, administrative structures, and budgets. The constituent parts are no longer discernible

Source: adapted from Himmelman, 2002.

For the National Strategy to be successful, all stakeholders must buy-in to the strategy, its vision and objectives. By involving stakeholders in the development process, each agency has had multiple opportunities to shape the Nigerian National Strategy. This organisational buy-in needs to be achieved across each agency.

To maximise coordination, Nigeria will require multiple forums and taskforces with clearly defined roles (Figure 8). Nigeria has an established National Stakeholders Forum for Combatting Wildlife and Forest Crime in Nigeria (NSF) with representation from all major stakeholders. This forum meets quarterly, providing a platform for networking, coordination and driving policy change, allowing representatives to regularly report back to their agencies. The NSF allows the Federal Ministry of Environment to regularly engage with all stakeholders and ensure momentum and coordination on strategy implementation. In addition to the current stakeholders of the NSF, it will be important to include the judiciary and state actors to enhance collaboration with these groups.

Not all partners are represented on the NSF, including many of the non-governmental and bilateral partners. For these other stakeholders, it will be critical to identify focal persons, who must be familiar with the National Strategy and their roles and responsibilities in implementing it. Regular communications through the NSF and the organisational focal points will prevent duplication of efforts, harness collaboration, and catalyse effective and transparent sharing of information.

Implementing the National Strategy is dependent on having the available resources (further details in Appendix C). To this extent, a **Resource Mobilisation Taskforce** should be convened, consisting of representatives from key NSF agencies such as the Federal Ministry of Environment, the Federal Ministry of Justice, the Federal Ministry of Finance, Budget and National Planning (FMFBNP), the Federal Department of Forestry, the Federal Department of Fisheries, the Nigerian Customs Service and NESREA.

The Taskforce must develop an outline of resource needs for each strategic activity, tasking the lead agencies for each activity to prepare budgets for implementation. Once a high-level budget has been prepared for delivering the National Strategy, the Taskforce can align these needs with agency budgeting processes. By having representation from the key agencies and ministries, the representatives will be well placed to report on their own agencies' budgets and ensure coordination of funding across all the key stakeholders. By engaging the FMFBNP regularly, not only can this elevate the seriousness of wildlife crime, but it also allows the FMFBNP to better understand what resources are required to effectively tackle wildlife crime. The Taskforce can lobby the FMFBNP to raise national financial commitments to tackling wildlife crime.

Implementation success will be enhanced through the effective engagement of international support, including bilateral and multilateral agencies, and NGO partners. The NGO sector has an important role to play in supporting implementation but there is a danger that each actor works in isolation. The Resource Mobilisation Taskforce should work regularly with NGO partners to coordinate and plan implementation, and report on what has been delivered. As part of this exercise, the Taskforce can understand which parts of the resource requirements have been covered from other sources. The international donor community may be able to assist in areas with shared objectives. An initial priority must be to identify these donors and garner their financial support for implementing the National Strategy. External partners can mobilise resources for implementation, provide technical support, and help elevate the agenda nationally, generating political will. Nigeria needs to work closely with its donor community to encourage their support, proactively engage with them, and regularly and promptly communicate with them, particularly on bilateral programmes of work.

Figure 8:
An outline of the key forums and taskforces for implementing the National Strategy.

Strategy coordination

National Stakeholders Forum for Combatting Wildlife and Forest Crime in Nigeria (NSF)

Who: Representatives from all the key agencies
Roles: Coordinate all partners, coordinate strategy implementation, provide leadership, liaise and network, report back within each agency

Focal Persons

Who: Identified Focal Persons for all other stakeholders
Roles: Regularly communicate with NSF and other stakeholders, Coordinate actions through NSF, liaise and network, share information with Operational Taskforce

Resource Mobilisation Taskforce

Who: Identified agencies and representatives from NSF
Roles: Develop an outline of resource needs for each activity of the Strategy. Align strategy needs with organisational / agency budgeting process. Lobby FMFBNP to increase national financial commitments to tackle wildlife crime. Liaise with bilateral and multilateral agencies, and NGO partners to coordinate funding requests to support implementation of the strategy

Law enforcement coordination

Operational Taskforce

Who: Identified law enforcement officers from key mandated agencies
Roles: Coordinate and initiate intelligence-driven law enforcement operations and investigations, share information and intelligence with trusted partners

Fisheries

Fisheries Taskforce

Who: Representatives from relevant institutions for fisheries sector
Roles: Adapt strategy for fisheries sector, coordinate and lead fisheries-related strategy implementation

Source: Outcome of the consultations.

The National Strategy recommends the creation of two focused taskforces. These are:

(i) The **Operational Taskforce**: this will be critical for bringing together the mandated law enforcement agencies, enabling close collaboration and coordination to tackle wildlife crime. It will enable collaboration on law enforcement operations, intelligence sharing and investigations.

(ii) The **Fisheries Taskforce**: relevant, as there are many different stakeholders involved in tackling IUU fishing and crimes in the fisheries sector (as well as some overlapping institutions).

The National Strategy does not outline who should be represented on each of the forums and taskforces, but it's important that taskforces should be independent, and comprised of agencies with the mandates and capabilities to achieve the task force objectives. The Operational Taskforce needs to share sensitive information between agencies, while the Fisheries Taskforce must include representatives of the Navy who are responsible for the security of territorial waters.

Regular reporting and feedback are important components of coordination. The National Strategy will incorporate regular feedback meetings at various levels to ensure the NSF stakeholders, the various taskforces and the focal points of all other stakeholders are aware of all relevant updates and planned activities. Furthermore, Nigeria will develop annual status reports on wildlife crime, part of which will meet the CITES requirements of providing an annual illegal wildlife trade report. Various CITES recommendations[59] are particularly relevant to reporting and coordination.

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59   Res. 18.6, paras 8 a) on coordinating the preparation of an annual illegal trade report; and paras 11, 12, and 13 regarding coordination and capacity-building.
Res. 11.3 (Rev. CoP18) regarding communication of information and coordination, Annex 3, Guidance for specialised wildlife law enforcement units.
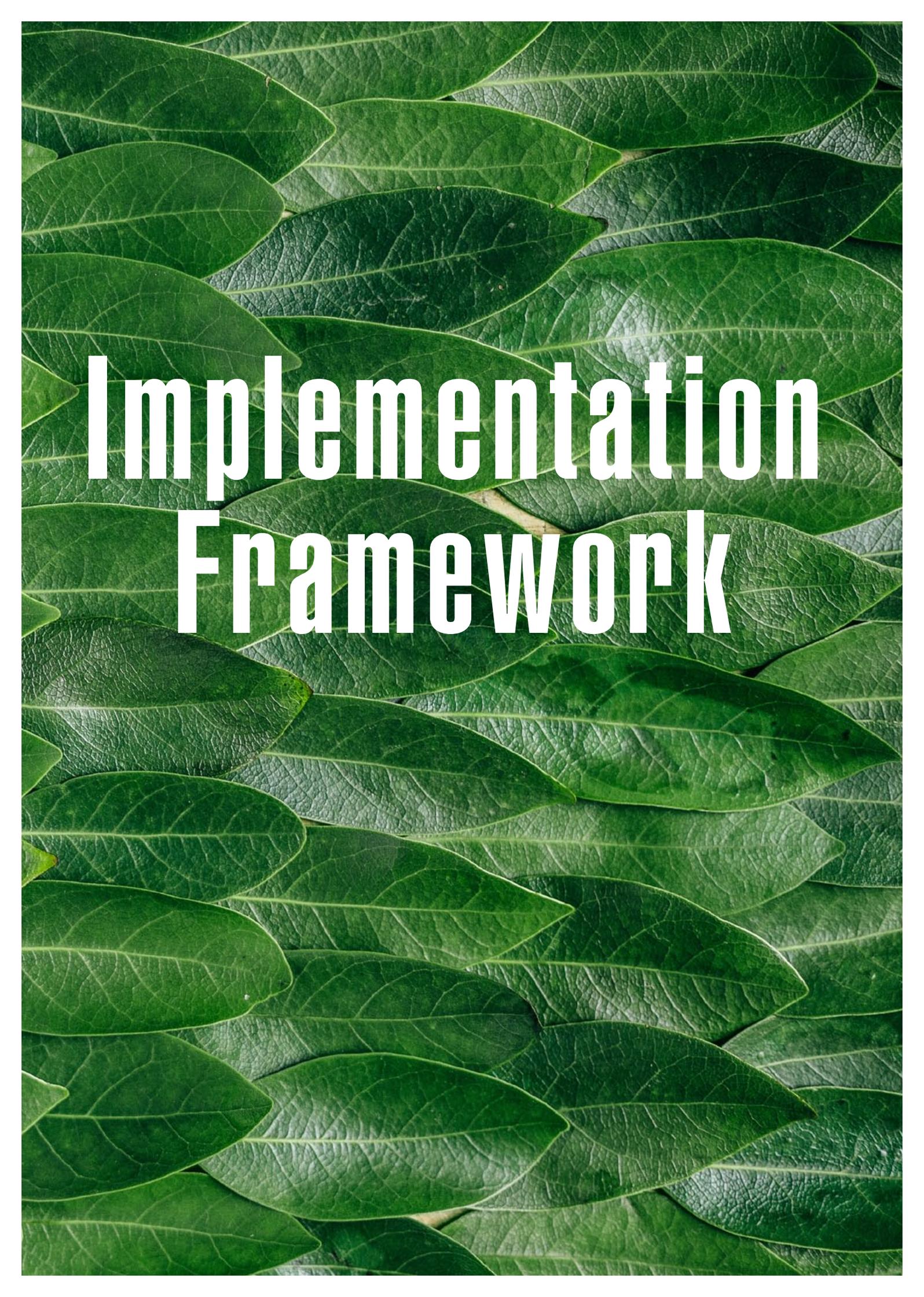
Implementation Framework

Sub-objectives, expected outputs, activities and KPIs were developed for each strategic objective.

1.   Enhance institutional capabilities:
Develop the capabilities in all relevant institutions to drive evidence-based action to understand, detect and deter wildlife crime, enforce the law and sanction those involved in wildlife crime.

Sub-objective 1.1 Conduct national assessments to identify the gaps in the capabilities of relevant agencies to inform targeted training and other strategic interventions		
Expected output	1.1.1	Completed assessments of wildlife crime-related capabilities at key ministries, agencies and institutions.
Activities	1	Undertake ICCWC Toolkit and ICCWC Indicator Framework assessment.
	2	Undertake UNODC Value Chain analysis for the fisheries sector.
Lead actors		FMENV, FDF, FMARD, FMFBNP, NESREA, NCS, FMOJ, NJI, UNODC, ICCWC
Expected output	1.1.2	Targeted action plans have been developed, to inform capacity development for all agencies and institutions, for terrestrial as well as marine and inland fisheries sectors, based upon the outputs of 1.1.1.
Activities	1	Develop targeted action plan to develop capabilities to combat wildlife crime.
	2	Develop targeted action plan to develop capabilities to combat IUU fishing and crimes in the fisheries sector in both marine and inland fisheries.
Lead actors		FAO, FMENV, FDF, FMARD, FMFBNP, NESREA, NCS, FMOJ, NJI, FDFA

Sub-objective 1.2 Develop wildlife crime and fisheries specific training capabilities in Nigeria		
Expected output	1.2.1	Training capability requirements for each relevant institution have been determined.
Activity	1	Based upon targeted action plans to develop capabilities (1.1.2), identify which training capabilities need to be institutionalised and which can be done through short term and/or periodic trainings.
Lead actors		FMENV, FDF, FMARD, FMFBNP, NESREA, NCS, FMOJ, FRIN
Expected output	1.2.2	Requisite training capabilities are institutionalised: Dedicated training institutions, and organisational training units have the necessary capabilities to build competencies related to wildlife crime and fisheries sector.
Activities	1	Develop train-the-trainer courses for major wildlife crime related topics (identification and detection; intelligence gathering; multi-agency led investigations and case preparation; judicial processes)
	2	Develop systems for relevant institutions to ensure sufficient resources, training and retraining are in place to keep high standards.
	3	Appropriately train identified staff from relevant institutions, and retrain as required.
Lead actors		FMENV, FDF, FMARD, FDFA

Expected output	1.2.3	Short term and periodic trainings address targeted competency needs.
Activities	1	Based upon targeted action plans to develop capabilities (1.1.2), collate list of available training courses provided by existing training institutions, intergovernmental and NGO partners.
	2	Find trusted service providers and/or develop these service providers locally.
	3	Develop courses / request capacity building support to address any outstanding capacity building needs.
	4	Hold regular coordination meetings with institutions and partners to align training to identified needs.
	5	Appropriately train identified staff from relevant institutions, and retrain as required.
Lead actors		FMENV, FDF, FDFA

Sub-objective 1.3
Ensure Nigeria has sufficient knowledge of wildlife crime status and trends to inform evidence-based interventions to tackle wildlife crime and IUU fishing and crimes in the fisheries sector

Expected outputs	1.3.1	Review of existing data collected by government agencies and interested stakeholders, to align data collection needs, processes, and refine the institutional needs to improve data collection.
	1.3.2	Focused list of research questions and knowledge needs from all relevant institutions, including technical specifications of required precision and monitoring frequency.
Activities	1	Convene wildlife crime-focused data collection workshop with all the relevant institutions and stakeholders to understand current processes, outline available data, introduce the CITES illegal trade database and identify research questions and knowledge needs, and opportunities for alignment and data collation.
	2	Convene marine and inland fisheries crime-focused data collection workshop with all the relevant institutions and stakeholders to understand current processes, outline available data, and identify research questions and knowledge needs, and opportunities for alignment and data collation.
	3	Incorporate outputs of the data collection workshops into the capability requirements (1.1.2).
	4	Review and strengthen the wildlife crime and fisheries crime monitoring and evaluation blueprint.
Lead actors		FMENV, FDF, FRIN, FDFA, NIOMR, NPS

Expected output	1.3.3	Effective data collection and reporting systems are in place.
Activities	1	Develop the specifications for an accessible data collection and collation system based upon knowledge and reporting needs. The CITES illegal trade database is a critical resource. Where appropriate, the system must allow for limited internet accessibility and infrastructure.
	2	Develop a capability in relevant institutions to monitor the illegal charcoal trade.
	3	Develop a blueprint for data collection and collation system, including centralised databases where necessary.
	4	Build the data collection and collation system.

Activities	5	Develop an operational project register where government agencies, collaborating development partners and NGOs can report on support provided to Nigeria, highlighting how such support aligns with the National Strategy. This could be updated through in-person updates at the NSF forum. This register should be updated quarterly and hosted on the Ministry of Environment's website. This also allows development partners and NGOs to better understand the gaps in implementation of the National Strategy.
	6	Build user competencies on the data collection and collation system with all relevant stakeholders.

Lead actors		FMENV, FDF, FRIN, NPS, FDFA, NIOMR

Expected outputs	1.3.4	**Effective collection of information related to wildlife crime status and knowledge needs, collation and analysis of data, and dissemination to relevant institutions.**
	1.3.5	**Report on the status of wildlife crime updated annually in alignment with CITES requirements.**

Activities	1	Develop targets for activities in the Nigerian National Strategy and monitoring framework for NSF oversight.
	2	Lead agencies provide reports regularly, at a minimum of once a year, on targets to ensure implementation of the National Strategy and facilitate evidence-based decision making.
	3	Collect and collate relevant wildlife crime and fisheries data (as determined in 1.3.2 and 1.3.3.).
	4	Through the lead agencies, regularly collate and analyse data, and prepare annual reports on the status of wildlife crime in Nigeria to align with CITES reporting requirements.
	5	Through the NSF Fisheries Taskforce (3.1.3), regularly collate and analyse data, and prepare annual reports on the status of IUU fishing and crimes in the fisheries sector in inland and marine fisheries in Nigeria

Lead actors		FMENV, FDF, FRIN, FDFA, NIOMR

Sub-objective 1.4
Build competencies within relevant law enforcement agencies to detect, investigate and report on wildlife crime

Expected output	1.4.1	**All relevant institutions have clearly defined Standard Operating Procedures and Codes of Conduct for seizures, arrests, detention, and investigations.**

Activity	1	Strengthen or develop (if required) Standard Operating Procedures to address wildlife crime and Codes of Conduct at all relevant institutions. Ensure ownership of this process within all relevant institutions to facilitate adoption.

Lead actors		FMENV, FDF, FMOJ, NJI, NCS, NESREA, NPS, FRIN, NPF, INTERPOL, FMARD

Expected output	1.4.2	**All relevant institutions have the competencies to gather and analyse intelligence and share actionable intelligence to drive operations.**

Activities	1	Based on the assessments (1.1.1), build competencies in the mandated agencies (where required) to gather and analyse intelligence.
	2	Strengthen or develop (if required) mechanisms and agreements for sharing actionable intelligence within trusted networks, including with international partners and networks.

Lead actors		FMENV, FDF, NCS, NESREA, NPS, DSS, NPF, INTERPOL

Expected output	1.4.3	All relevant institutions can profile suspects and packages, detect wildlife crime, and identify CITES-listed species and their derivatives.
Activity	1	Build capacity within relevant agencies to profile suspects and packages, detect smuggling and identify wildlife crime products.
Lead actors		FMENV, FDF, NCS, NESREA, NPS, DSS, NiPOST, FAAN, NPF, INTERPOL
Expected outputs	1.4.4	All relevant institutions have traceable procedures for handling and managing wildlife crime scenes, specimens, and evidence.
	1.4.5	All seizures are promptly and properly documented, with evidence chains secured to fully prepare case files for prosecution.
Activity	1	Strengthen or develop (if required) procedures and build capacity to manage wildlife crime scenes and specimens, and to secure evidence chains and prepare case files to support prosecutions.
Lead actors		FMENV, FDF, NCS, NESREA, NPS, NPF, INTERPOL

Sub-objective 1.5
Build competencies of prosecutors and judiciary to swiftly prosecute cases and pass appropriate sentences

Expected output	1.5.1	Reference guides on wildlife crime have been developed for both prosecutors and judiciary.
Activity	1	Develop materials and reference guides to support prosecutors and judiciary.
Lead actors		FMOJ, Judiciary, NJI
Expected outputs	1.5.2	Prosecutors and judiciary at both federal and state courts are adequately trained on relevant national laws related to wildlife crime.
	1.5.3	All prosecutors (federal, state, agency) have the competencies to successfully prosecute wildlife crime cases.
Activities	1	Based on the assessments (1.1.1), build competencies and knowledge to address wildlife crime of the Federal Ministry of Justice, prosecutors and judiciary (where required) at both federal and state level.
	2	Investigate feasibility for establishing dedicated courts / sensitised judges for the prosecution of wildlife crime.
Lead actors		FMOJ, Judiciary, NJI
Expected output	1.5.4	Procedures are in place to regularly update prosecutors and judges on latest wildlife crime developments (changes in regional and national policies and legislation, evolution of wildlife crime modus operandi).
Activity	1	Develop a network of knowledgeable and competent persons within the justice system. Disseminate materials and updates to this group.
Lead actors		FMOJ, Judiciary, NJI

Sub-objective 1.6 Provide tools, equipment and adequate resources to key institutions		
Expected output	**1.6.1**	**Relevant institutions have the necessary equipment and resources to perform their mandated roles.**
Activities	1	Based on needs assessment, identify required equipment and resources.
	2	Prioritise equipment and resource deployment based on maximum impact.
	3	Address identified equipment and resource gaps within relevant institutions.
Lead actors		FMENV, FDF, FMOJ, NJI, NCS, NESREA, NPS, NPF, INTERPOL, FDFA
Expected output	**1.6.2**	**Relevant institutions have secure facilities with robust chain-of custody systems and digitized databases of stockpiles and evidence in place for handling and managing specimens and evidence.**
Activities	1	Strengthen storage facilities at key locations and create robust chain-of-custody systems.
	2	Design and institutionalise transparent and verifiable Standard Operating Procedures for stockpile management, including information and security. The SOPs should detail the roles and responsibilities of each agency.
	3	Build electronic systems to digitize records of stockpiles and evidence, and ensure these records are automatically updated and centralized.
	4	Develop protocols that allow the use of wildlife / forestry product parts for research purposes, once prosecutions have been completed and based on approval of the courts.
Lead actors		FMENV, FDF, NCS, NESREA, NPS
Expected output	**1.6.3**	**Relevant institutions have the training, equipment, procedures and support necessary to handle and release / rehome confiscated live specimens safely and humanely in the short, medium and long term.**
Activities	1	Build competencies and develop procedures to handle confiscated live specimens safely and humanely.
	2	Identify responses protocols and solutions for species that are most commonly confiscated, working with key partners.
Lead actors		FMENV, FDF, NCS, NESREA, NPS, NGO partners
Expected output	**1.6.4**	**Intelligence sharing and information platforms are institutionalised and fully functioning.**
Activity	1	Identify appropriate intelligence sharing and information platforms and embed these within relevant institutions, ensuring ongoing training and support.
Lead actors		FMENV, FDF, NCS, NESREA, NPS, NPF, INTERPOL

2. Strengthen the legal framework:

Enable legal and sustainable trade, protect Nigeria's fauna and flora, and deter wildlife crime through a harmonised and strengthened legal framework.

Sub-objective 2.1 Review, strengthen and harmonise Nigeria's legislative framework related to wildlife crime		
Expected output	2.1.1	Recommendations from analysis of criminal justice legislative framework[60] have been addressed.
Activity	1	Resolve all recommendations from the analysis of the criminal justice legislative framework
Lead actors		FMOJ, FMENV, FDF, NJI, relevant NGOs
Expected output	2.1.2	The Endangered Species (Control of International Trade and Traffic) Amendment Act 2015 has been reviewed and updated.
Activity	1	Review, update and gazette the Endangered Species (Control of International Trade and Traffic) Amendment Act 2016.
Lead actors		FMOJ, FMENV, FDF, NJI, FRIN, relevant NGOs
Expected output	2.1.3	National fisheries legislation have been reviewed and strengthened to help address international and domestic crimes in the fisheries sector.
Activities	1	Amend and update the Nigerian Sea Fisheries Act 1992.
	2	Review any other pertinent national fisheries laws and regulations to ensure they are fit-for-purpose for combatting both international and domestic crimes in the fisheries sector.
Lead actors		FMOJ, FDFA, NIMASA, NJI
Expected output	2.1.4	Thresholds have been put in place above which agencies cannot "compound" wildlife crime offences.
Activity	1	Agree upon and update all relevant legislations to place thresholds above which compoundment (admission of guilt fines) cannot be applied. For example, offences involving endangered species should not be compounded.
Lead actors		FMOJ, NJI
Expected output	2.1.5	Federal and State wildlife laws have been harmonised.
Activities	1	Implement the recommendations of the ongoing review of federal and state laws, once completed. Detailed review of federal and state wildlife laws pertaining to wildlife and forest crime.
	2	Convene law makers from both federal and state agencies to harmonise and gazette all relevant legislation.
Lead actors		FMOJ, NJI

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60 Shamini Jayanathan, Arcturus Consultancy Ltd. May 2021. Executive Summary and Key Recommendations – Combating Wildlife Crime in Nigeria: An Analysis of the Criminal Justice Legislative Framework. Africa Nature Investors Foundation and Environmental Investigation Agency (UK).

Expected output	2.1.6	**Regulation of possession of identified live endangered species, their products and derivatives.**
Activities	1	List of endangered and other species identified where possession of that species is unsustainable on wild populations and should be regulated. This should build upon CITES Appendices and IUCN Red List data, incorporating Nigerian context.
	2	Lobby for policy change to discourage possession of wildlife (especially endangered species) and their derivatives.
	3	Incorporate into all relevant laws (where required) the regulation of the possession of the identified live species, their products and derivatives.
Lead actors		FMOJ, NJI
Expected output	2.1.7	**Wildlife and forest offences meet the definition of "serious crimes" under the United Nations Convention Against Transnational Organized Crime.**
Activity	1	Elevate wildlife and forest crime offences so they are recognised in Nigeria as a "serious crime"
Lead actors		FMOJ, FMENV, FDF, NJI, UNODC
Expected output	2.1.8	**Nigeria's legislative framework incorporates provisions to implement the WASCWC.**
Activities	1	Outline any shortfalls in the legislative framework for implementing the WASCWC.
	2	Strengthen the legislative framework to address these identified shortfalls.
Lead actors		FMENV, FMOJ, NJI

Sub-objective 2.2
Effectively regulate legal and sustainable wildlife trade in Nigeria

Expected output	2.2.1	**Recommendations related to legal framework from CITES Article XIII report have been addressed.**
Activity	1	Resolve all recommendations related to the legal framework from the CITES Article XIII report
Lead actors		FMENV, FDF, FMOJ, NJI, NESREA
Expected output	2.2.2	**Key stakeholders and general public are aware of and comply with the procedures for legal wildlife trade.**
Activity	1	Conduct targeted campaigns to raise awareness on wildlife trade, permit procedures and CITES.
Lead actors		FMENV, FDF, NESREA

Expected output	2.2.3	Legal trade, even domestic, meets the CITES criteria and does not contribute to the decline of threatened species, with quotas set based upon scientific knowledge, at a minimum "non-detrimental findings".
Activities	1	Design and implement national level research on the status of key wildlife and flora species.
	2	Establish trade quotas for both international and national trade of key species, based upon rigorous and defensible scientific knowledge. Research data and modelling informs annual reports on the sustainability of trade in all key species.
	3	Identify and mandate the relevant agency to regulate and license trade in common products i.e. charcoal, lumber, bushmeat.
	4	Investigate options to adopt and enforce 'offtake seasons' for key species to ensure harvest is sustainable.
	5	Define Nigeria's position on the captive breeding of endangered species.
	6	If approved, develop the capabilities to regulate the captive breeding of endangered species to prevent such operations acting as a reservoir for legal and illegal trade. Any actors should be properly licensed through certified institutions with close monitoring in place.
	7	Investigate regulations related to harvesting methods to reduce by-catch.
Lead actors		FMENV, FDF, NESREA, FRIN
Expected output	2.2.4	An online management regulation system for legal trade has been developed.
Activities	1	Assess the risks of an electronic permitting system, proposing mitigation measures for these risks.
	2	Outline the parameters of an electronic permitting system, ensuring permits can be easily traced and audited.
	3	Develop the blueprint for an electronic permitting system, consulting with all relevant institutions.
	4	Build, test, refine and adopt the electronic permitting system.
	5	Train all relevant institutions in the use of the electronic permitting system.
	6	Communicate the electronic permitting system, and the output of validated permits, with counterparts at the countries of import and at the CITES Secretariat.
Lead actors		FMENV, FDF, NESREA, FRIN, NCS
Expected output	2.2.5	Increased incentives and pathways for legal trade are supported.
Activities	1	Investigate options to support and reward sustainable and legal trade.
	2	Develop management and regulation systems that facilitate legal trade.
	3	Develop guidelines / standards for responsible wildlife sourcing and business practices.
	4	Design policy interventions that facilitate legal trade and promote behaviour change of the market.
Lead actors		FMENV, FDF, NESREA, FRIN

Expected output	2.2.6	Measures are in place to ensure that legal and illegal trade does not contribute to the spread of zoonotic diseases.
Activities	1	Complete risk assessment of where wildlife crime enables the spread of zoonotic disease.
	2	Develop and disseminate procedures to mitigate the risks of the spread of zoonotic diseases.
Lead actors		MENV, FDF, FMARD, NESREA, FRIN, NPS

Sub-objective 2.3
Develop and provide resources to support successful prosecutions

Expected output	2.3.1	Case files in priority courts are digitized to expedite trials.
Activities	1	Develop digital database systems to collate information from priority courts.
	2	Populate database with historic cases from priority courts.
	3	Identify key persons from relevant institutions to maintain and update database of court records.
Lead actors		FMOJ, Judiciary, NJI, NPS
Expected output	2.3.2	Central database is established for recording and analysing previous arrests and convictions.
Activities	1	Develop digital database systems to collate information on previous arrests and convictions related to wildlife crime.
	2	Populate database with historic wildlife crime cases. Identify key persons from relevant institutions to maintain and update database of wildlife crime perpetrators.
Lead actors		FMOJ, Judiciary, NJI, NPS
Expected output	2.3.3	Witness support fund has been established with strong governance in place.
Activities	1	Design governance and management framework for witness support fund.
	2	Raise funds to mobilise witness support fund.
Lead actors		FMOJ, NJI, NPS
Expected output	2.3.4	Resources are made available to support the judiciary with subregional and international collaboration including through the implementation of Mutual Legal Assistance provisions, the creation of regional networks of judges and prosecutors and any other means appropriate.
Activities	1	Strengthen or develop (if necessary) a regional network of judges and prosecutors. Convene the network regularly.
	2	Support the implementation of Mutual Legal Assistance provisions.
Lead actors		FMOJ, Judiciary, NJI, NPS

3. Increase collaboration:

Ensure strong coordination, led by accountable partners, to facilitate national and international collaboration and information sharing between all relevant stakeholders to combat wildlife crime.

Sub-objective 3.1 Define how all institutions work and collaborate to combat wildlife crime		
Expected output	3.1.1	**Institutional mapping clearly defines roles and responsibilities of all institutions along the spectrum of wildlife crime interventions.**
Activities	1	Convene a workshop with all relevant stakeholders at both federal and state level to outline roles and responsibilities and overlaps between institutions.
	2	Strengthen the stakeholder mapping to document detailed roles and responsibilities for all relevant institutions, and to describe the overlap between federal and state actors.
Lead actors		FMENV, FDF, FMARD, FMFBNP, FMOJ, NCS, NESREA, NPS, NPF, SDF, NJI
Expected output	3.1.2	**National-level protocols and systems that improve collaboration between partners are in place.**
Activities	1	Develop protocols and standard operating procedures to improve collaboration between all institutions.
	2	Foster more robust/harmonious synergies and working relationships between Federal and State Ministries, Departments and Agencies.
Lead actors		FMENV, FDF, FMARD, FMFBNP, FMOJ, NCS, NESREA, NPS, SDF, NJI
Expected output	3.1.3	**A Fisheries Taskforce is established to coordinate activities to address IUU fishing and crimes in the fisheries sector in both international and national waters.**
Activities	1	Identify all stakeholders in the fisheries sector.
	2	Establish a Fisheries Taskforce to lead and coordinate activities to address IUU fishing and crimes in the fisheries sector in both international and national waters.
	3	Conduct a review of the annual plan to identify activities relevant to addressing IUU fishing and crimes in the fisheries sector.
	4	Secure resources to implement the interventions of the Fisheries Taskforce.
Lead actors		FMENV, FMARD, NIMASA, NIFFR, NIOMR, NPA
Expected output	3.1.4	**Implementation of the National Strategy is coordinated by the identified lead agencies for each output.**
Activities	1	Convene an annual planning meeting to implement the National Strategy.
	2	For each activity, the lead actor must identify all relevant stakeholders and coordinate multi-stakeholder support for implementation.
Lead actors		FMENV, FDF, All Lead Actors
Expected output	3.1.5	**Memorandum of Understanding (MoU) between relevant institutions sets the legal basis for information sharing, and defines investigative and prosecutorial ownership over seizures.**
Activity	1	Agree upon and sign MoUs between relevant institutions to enable information sharing and to define investigative and prosecutorial ownership over seizures.
Lead actors		FMENV, FDF, All Lead Actors

Expected output	3.1.6	Nigerian institutions actively participate in international and regional partnerships to enhance collaboration.
Activities	1	Agree upon representatives to participate in international and regional partnerships, for example WAN or the Regional Intelligence Liaison Officer.
	2	Ensure these representatives report back to the NSF.
Lead actors		FMENV, FDF, NCS, INTERPOL, SDF

Sub-objective 3.2
Strengthen NSF to enhance collaboration of all key institutions

Expected output	3.2.1	All key institutions involved in combating wildlife crime are members of a multi-disciplinary NSF, with appointed liaison officers represented on it.
Activitiy	1	Review membership of the NSF to ensure all relevant institutions are represented.
Lead actors		FMENV, FDF
Expected output	3.2.2	Minutes of the quarterly NSF meetings are disseminated to all relevant institutions.
Activities	1	Convene regular meetings of the NSF.
	2	Disseminate minutes to all relevant institutions. Focal points should be responsible for disseminating further within each institution.
Lead actors		FMENV, FDF

Sub-objective 3.3
Strengthen the coordination of law enforcement operations and investigations

Expected output	3.3.1	An Operational Taskforce has been established to coordinate and initiate intelligence-driven operations and investigations.
Activities	1	Constitute the Operational Taskforce from mandated law enforcement agencies to coordinate and initiate intelligence-driven operations and investigations. Each of the lead agencies should nominate personnel for the Taskforce. The Operational Taskforce needs the mandate and capabilities to drive operations and investigations.
	2	Outline a governance mechanism for the Operational Taskforce.
	3	Develop a Terms of Reference (including regarding intelligence-driven operations and inter-agency intelligence exchange) and SOPs for the Operational Taskforce.
	4	Develop procedures for the Operational Taskforce to work with other relevant partners, such as NGOs, to capture and act upon actionable intelligence.
Lead actors		FMENV, FDF, NESREA, NCS, EFCC, NFIU, NPF, INTERPOL, NPS

Expected output	3.3.2	A national wildlife crime "fusion centre" has been established to act as an operational centre.
Activity	1	Establish a national wildlife crime "fusion centre" to host the Operational Taskforce. The "fusion centre" would provide a physical space to serve as a secure office for the Operational Taskforce.
Lead actors		FMENV, FDF, NESREA, NCS, EFCC, NFIU, NPF, INTERPOL

Sub-objective 3.4		
Information and intelligence are securely shared with appropriate institutions through agreed channels		
Expected output	3.4.1	Information mapping defines the different levels of information being gathered with procedures defined for the proper sharing of information with appropriate institutions (both locally and internationally).
Activity	1	Convene information workshop with all relevant institutions and stakeholders to understand who is gathering what information, who is analysing information, and agreeing on the procedures for the proper sharing of information with the appropriate institutions.
Lead actors		FMENV, FDF, NESREA, NCS, NPS, EFCC, NFIU, NPF, INTERPOL
Expected output	3.4.2	Maps of organised crime networks involved in wildlife crime are developed.
Activities	1	Research organised criminal networks and individuals, understanding roles in wildlife crime and linking actors.
	2	Create maps of organised crime networks and individuals involved in wildlife crime
Lead actors		FMENV, NESREA, NCS, NPS, EFCC, NFIU, NPF, INTERPOL

Expected output	3.4.3	Intelligence sharing platforms are coordinated at the fusion centre, with analysis conducted to identify actionable intelligence in a timely manner.
Activities	1	Collate intelligence from the operational intelligence sharing platforms (1.6.4) through the NSF Operational Taskforce.
	2	Conduct regular analysis of intelligence through the NSF Operational Taskforce, and corroborate credibility to identify actionable intelligence.
Lead actors		FMENV, NESREA, NCS, NPS, EFCC, NFIU, NPF, INTERPOL
Expected output	3.4.4	Protocols are developed and implemented to share intelligence and non-sensitive information to identified institutions based on the agreed information map.
Activity	1	Based on the agreed MoUs (3.1.5), develop and agree protocols for sharing both intelligence and non-sensitive information with identified institutions.
Lead actors		FMENV, FDF, NESREA, NCS, NPS, EFCC, NFIU, NPF, INTERPOL
Expected output	3.4.5	Research reports feed into wildlife crime strategies and law enforcement operations, enhancing the capabilities of all relevant institutions to adaptively manage their wildlife crime responses.
Activities	1	Develop systems to ensure all research reports related to wildlife crime are shared with all relevant institutions.
	2	Highlight and disseminate key recommendations and any pertinent information that can inform wildlife crime strategies and law enforcement operations.
Lead actors		FMENV, FDF, FRIN, NIOMR, NIFFR, NPF, INTERPOL
Expected output	3.4.6	Active engagement with regional and international law enforcement networks and agencies such as WAN, Interpol, Afripol, WCO and the Lusaka Agreement Task Force.
Activities	1	Appoint point person(s) from the NSF to engage with all relevant regional and international law enforcement agencies, task forces, and networks.
	2	The point person must provide quarterly feedback to the NSF on any updates from each of the regional and international law enforcement agencies, task forces, and networks.
Lead actors		FMENV, FDF, NESREA, NCS, NPF, INTERPOL

4. Honour commitments:
Ensure compliance with national and international commitments to legal trade and wildlife crime.

Sub-objective 4.1 Nigeria meets and adheres to its international commitments to CITES		
Expected output	4.1.1	All recommendations related to CITES Article XIII have been resolved.
Activities		See 2.2
Lead actors		FMENV, FDF, FMFBNP, NESREA,FRIN
Expected output	4.1.2	The National Ivory Action Plan (NIAP) has been implemented.
Activities	1	Implement the NIAP for Nigeria.
	2	Submit timely comprehensive progress reports on the NIAP in the prescribed format to the CITES Secretariat.
Lead actors		FMENV, FDF, NESREA, FRIN, NPS
Expected output	4.1.3	CITES Annual Trade Report data and Illegal Trade Report are submitted to CITES annually in the proper format, and in a timely manner.
Activities	1	Collate data related to CITES Trade and Illegal Trade on an annual basis.
	2	Prepare the CITES Annual Trade Report using the proper format, and disseminate the finalised report to CITES in a timely manner.
	3	Prepare the Illegal Trade Report using the proper format, and disseminate the finalised report to CITES in a timely manner.
Lead actors		FMENV, FDF, NESREA, FRIN
Expected output	4.1.4	Relevant institutions have the capabilities to effectively implement their CITES mandate.
Activities	1	Outline the capabilities required in each of the CITES mandated institutions.
	2	Identify the shortfalls in staff competencies at each of the CITES mandated institutions.
	3	Based on available training courses (1.2), build the competencies of the staff at the CITES mandated institutions to be able perform their roles and responsibilities effectively.
	4	Resource the mandated CITES institutions with the personnel, resources and equipment to perform their roles effectively (align with 1.6.1).
Lead actors		FMENV, FDF, NESREA, FRIN

Expected output	4.1.5	CITES permits are endorsed, validated and reported on to the country of import and CITES.
Activities	1	Endorse and validate all CITES permits, using the electronic permit system (2.2.3), ensuring multiple levels of validation within the CITES mandated institutions.
	2	Share approved permits automatically with counterparts from the country of import and from the CITES Secretariat, using the electronic permitting system.
Lead actors		FMENV, FDF, NESREA, FRIN
Expected output	4.1.6	Annual stockpile inventories demonstrate auditable control and disposal measures.
Activities	1	Conduct annual inventories of stockpiles as per the defined and agreed SOPs for stockpile management (see 1.6.2).
	2	Compare inventories against digital databases of stockpiles, specimens and evidence files.
	3	Comprehensively examine sign-off processes for any removal of evidence for judiciary processes or disposal of stockpiles or specimens.
Lead actors		FMENV, FDF, NESREA, NCS, NPS

Sub-objective 4.2
Nigeria meets and adheres to its international commitments on wildlife crime

Expected output	4.2.1	Nigeria's international commitments related to wildlife crime are identified.
Activity	1	Review Nigeria's international commitments and conventions to identify those relevant to addressing wildlife crime.
Lead actors		FMENV, FDF
Expected outputs	4.2.2	The WASCWC is implemented, with active support and implementation by Nigeria.
	4.2.3	The Convention on Migratory Species (CMS) multi-species Action Plan is implemented, with active support and implementation by Nigeria.
	4.2.4	All other relevant international commitments and conventions are implemented, with active support and implementation by Nigeria.
Activities	1	The identified point person (3.3.6) identifies relevant activities for Nigeria from the WASCWC.
	2	The identified point person (3.3.6) identifies relevant activities for Nigeria from the CMS multi-species Action Plan, including for vulture species.
	3	The identified point person (3.3.6) identifies relevant activities for Nigeria from all other relevant commitments and conventions.
	4	Identified activities are disseminated to the NSF.
	5	Identified activities are aligned to the National Strategy during the annual planning meetings (3.1.4).
Lead actors		FMENV, FDF

Expected outputs	4.2.5	WAN and Regional Intelligence Liaison Offices have been strengthened to support Nigeria's regional commitments.
	4.2.6	Nigeria's role as a transit country is reduced through increased collaboration and improved intelligence sharing to protect the natural resources of key source countries both within the ECOWAS region and across Africa.
Activities	1	Strengthen existing regional networks, such as WAN and the Regional Intelligence Liaison Office, by resourcing activities and supporting the identified point persons (3.3.6).
	2	Develop networks beyond the West Africa region to enhance collaboration and information sharing, particularly with Central Africa.
	3	Conduct coordinated law enforcement operations with the ECOWAS and Central African regional networks.
Lead actors		NCS (only 4.2.5) and FMENV

Sub-objective 4.3
Nigeria domesticates international commitments on legal trade and wildlife crime

Expected output	4.3.1	All relevant institutions understand their role in honoring Nigeria's International commitments and actively support them.
Activity	1	Disseminate the identified international commitments to all stakeholders, including a summary of relevance to wildlife crime, and the roles and responsibilities that each institution can play to support each commitment.
Lead Actors		FMENV, FDF
Expected output	4.3.2	The financial commitment of Nigeria to address wildlife crime and honour its international commitments have been increased.
Activities	1	Lobby for the Federal Government of Nigeria to increase its financial commitment to tackling wildlife crime to a level that reflects the importance of addressing wildlife crime and is commensurate to implement this Nigerian National Strategy.
	2	Secure commitments from relevant institutions for the allocation of personnel and resources to implement their roles and honour their commitments.
Lead actors		FMENV, FMFBNP

5.   Remove enablers of crime:
Prevent corruption and financial crime from enabling wildlife crime.

Sub-objective 5.1 Tackle corruption risks to reduce the opportunity for wildlife crime		
Expected output	5.1.1	High-level political commitment to develop a culture of zero-tolerance of corruption has been attained.
Activity	1	Facilitate public statements from the relevant ministries, authorities and agencies committing to zero-tolerance to corruption and if possible, an acknowledgement of the convergence of wildlife crime with other crimes and corruption.
Lead actors		FMENV, FMFBNP, ICPC, EFCC, NFIU, Legislative Actors
Expected output	5.1.2	Corruption risk assessment reports have been completed for all relevant institutions, with practical recommendations provided.
Activities	1	Identify institutions requiring corruption risk assessments.
	2	Complete corruption risk assessments for all identified institutions.
Lead actors		FMENV, ICPC, EFCC, NFIU
Expected output	5.1.3	Recommendations from the corruption risk assessments are resourced and implemented.
Activities	1	Sensitise the findings and recommendations of the corruption risk assessment reports within the relevant institutions, particularly to senior officials.
	2	Implement CITES Resolution 17.6 on corruption.
	3	Adopt and implement corruption risk mitigation measures in all relevant institutions.
	4	Educate officers on these corruption risk mitigation measures (including codes of conduct, and corruption prevention, anti-bribery and whistle-blowing policies).
Lead actors		FMENV, ICPC, EFCC, NFIU
Expected output	5.1.4	Relevant law enforcement agencies have the capabilities to prevent and identify corruption risks.
Activities	1	Develop and strengthen capabilities with the relevant law enforcement agencies to prevent and detect corruption risks.
	2	Develop systems within relevant institutions for whistle-blowers to report corruption anonymously. Systems should provide transparency on the process followed to address reports.
Lead actors		FMENV, ICPC, EFCC, NFIU, NPF, INTERPOL

Expected output	**5.1.5**	**The temptations of financial inducement and the opportunity for collusion have been removed.**
Activities	1	Based on the corruption risk assessments (5.1.2), identify clear shortfalls in pay and benefits of key individuals within relevant institutions.
	2	Present risks to financial inducement to senior officials within each institution, with clear recommendations.
	3	Institutionalise policies for key individuals at relevant institutions to be routinely supervised and rotated to remove the opportunity for collusion.
	4	Name and dismiss any law enforcement officers and/or government personnel found guilty of corrupt practices. These individuals should be swiftly dismissed from service and receive heavy sanctions as a deterrent to corruption.
Lead actors		FMENV, ICPC, EFCC, NFIU

Sub-objective 5.2
Prevent financial crimes from enabling wildlife crime

Expected output	**5.2.1**	**Completed assessments of money-laundering risks.**
Activities	1	Conduct assessments of money-laundering risks.
	2	Provide recommendations to address and mitigate risks.
Lead actors		FMFBNP, NFIU, EFCC
Expected output	**5.2.2**	**All relevant institutions have the capabilities to identify and report to the NFIU and EFCC on financial flows gained from or supporting wildlife crime.**
Activities	1	Train relevant institutions, including banks and financial institutions, on tracing, identification and reporting of suspected illicit proceeds of wildlife crime.
	2	Ensure SOPs related to wildlife crime cases inform and include NFIU and EFCC in a timely manner to facilitate effective financial investigations.
Lead actors		FMFBNP, NFIU, EFCC
Expected output	**5.2.3**	**NFIU and EFCC have the capabilities to investigate and prosecute any financial crimes associated with wildlife crime.**
Activities	1	Undertake a needs assessment of capabilities within the NFIU and EFCC, derived where possible from assessments completed in 1.1.
	2	Resource and implement the recommendations of the needs assessment to develop the capabilities of both NFIU and EFCC.
Lead actors		FMFBNP, NFIU, EFCC

6.   Raise awareness of wildlife crime:
Generate social and political will by raising awareness in all stakeholders as to the value of nature and the threat of wildlife crime.

Sub-objective 6.1 Develop a wildlife crime-focused communications strategy		
Expected output	6.1.1	A wildlife crime-focused communication strategy is developed.
Activities	1	Define key messages (value of nature, benefits of well-regulated sustainable trade to livelihoods, threat of wildlife crime, link to organised crime and regional insecurity, nature as a driver of social and economic development, link to zoonotic diseases, social and political relevance, biodiversity loss and climate change, each stakeholder's role in addressing wildlife crime) for the communications strategy.
	2	Define target audiences (relevant institutions, judiciary, political and religious leaders, public) for the communications strategy.
	3	Develop the wildlife crime-focused communications strategy sensitisation, awareness, and advocacy.
Lead actors		FMENV, FDF, FMOE, FMIC, SDF

Sub-objective 6.2 Sensitise target audiences by implementing the communications strategy		
Expected output	6.2.1	Personnel at all levels within all relevant institutions, including the judiciary, are aware of the importance of tackling wildlife crime.
Activities	1	Run targeted campaigns to disseminate the key messages from the communications strategy to personnel at all levels within all relevant institutions.
	2	Conduct awareness training for staff at supply chain transport, postal and courier companies.
	3	Conduct awareness training for staff at financial institutions that are at risk of being used to flow illicit proceeds from wildlife crime.
	4	Conduct awareness training for staff at online trading platforms.
	5	Design and implement surveys to test knowledge of wildlife crime within relevant institutions.
Lead actors		FMENV, FDF
Expected output	6.2.2	The public are knowledgeable of the key target messages.
Activities	1	Run targeted campaigns to disseminate the key messages from the communications strategy to the general public.
	2	Conduct sensitisation campaigns in key local languages through the following media (town hall meetings, school sensitisation, radio, films, poster adverts).
	3	Develop and implement a youth engagement strategy.
	4	Design and implement surveys to test knowledge of the general public on the value of nature and the importance of tackling wildlife crime.
Lead actors		FMENV, FDF, FMIC, NOA, FMOE, SDF

Expected output	6.2.3	Political and religious leaders understand the value of nature, the threat of wildlife crime, and the critical role they play in elevating the issue and driving change for the benefit of all.
Activities	1	Run targeted campaigns to disseminate the key messages from the communications strategy to political and religious leaders.
	2	Communicate the important role that these groups play in elevating the issue, and the actions that they can take to support the National Strategy.
Lead actors		FMENV, FDF, FMIC, NOA, SDF

Sub-objective 6.3
Turn social and political will into positive action to address wildlife crime

Expected output	6.3.1	Political leadership support the proposed legislative and policy change, provide the resources required for relevant institutions, and reduce the wildlife crime enablers.
Activities	1	Communicate the important role that political leaders play in elevating the issue, and the actions that they can take to support the Nigerian National Strategy.
	2	Monitor and report on the frequency of messaging from political leaders to the public regarding the value of nature and the importance of tackling wildlife crime.
	3	Monitor and report on the level of financial resources provided to relevant institutions by the FMFBNP to tackle wildlife crime.
	4	Secure political support for legislative and policy changes as outlined in 2.1.
	5	Lobby political leaders to recognise wildlife crime as a serious, organised crime.
Lead actors		FMENV, FDF, SDF
Expected output	6.3.2	Religious and traditional leaders act as key communicators in disseminating key messages to the public.
Activities	1	Communicate the important role that political leaders play in elevating the issue, and the actions that they can take to support the National Strategy.
	2	Monitor and report on the frequency of messaging from religious and traditional leaders to the general public regarding the value of nature and the importance of tackling wildlife crime.
Lead actors		FMENV, FDF, SDF
Expected output	6.3.3	The public, particularly in identified wildlife crime hotspots (based on intelligence and research findings), create community-based wildlife crime prevention initiatives, neighbourhood watch programmes and conservation clubs to address and report on wildlife crime.
Activities	1	Communicate the important role that the public can play in elevating the issue, and the actions that they can take to support the Nigerian National Strategy. Disseminate how the public can report on wildlife crime.
	2	Support the development of community-based wildlife crime prevention initiatives.
	3	Support the development of neighbourhood watch programmes.
	4	Support the development of conservation clubs.
Lead actors		FMENV, FDF, FMIC, NOA, SDF

7. Provide alternative livelihoods:
Empower local communities through developing wildlife crime prevention initiatives and alternative livelihoods.

Sub-objective 7.1 Develop strategic approach to empowering local communities		
Expected output	7.1.1	Focal areas for implementation of the alternative livelihood intervention strategy have been selected.
Activities	1	Identify the position in the wildlife value chain that would be most impactful to change through the development of alternative livelihoods.
	2	Identify key target species for which interventions would be important.
	3	Use intelligence, research findings and community mapping, to analyse key locations and actors along the wildlife crime supply chain.
	4	Generate a map of locations (including villages and areas of cities) that are hotspots for wildlife crime based on above.
	5	Analyse target communities to identify governance structures to facilitate engagement.
	6	Analyse target communities to identify current social development programmes.
Lead actors		FMENV, FDF, FRIN, NPS

Sub-objective 7.2 Coordinate livelihood development interventions with all relevant Ministries		
Expected output	7.2.1	Relevant Ministries and civil society organisations understand why target communities were selected, and the objectives of developing alternative livelihoods.
Activities	1	Convene a workshop with relevant ministries and government institutions at both state and local level (those focused on the social development agenda), and relevant civil society organisations.
	2	Convey messages around importance of tackling wildlife crime and communicate the defined strategy for empowering target communities.
	3	Create a working group between the stakeholders to coordinate any activities with target communities and to communicate progress updates.
Lead actors		FMENV, FDF, FRIN, NPS
Expected output	7.2.2	A list of appropriate alternative livelihood interventions has been defined.
Activities	1	Review of alternative livelihood interventions that have been shown to reduce wildlife crime, and would work in the Nigerian context, including results-based mechanisms.
	2	List other successful alternative livelihood interventions that would complement the objectives of the National Strategy.
Lead actors		FMENV, FDF, FRIN, NPS

Expected output	7.2.3	A social development plan has been created for each target community.
Activities	1	Define participatory process for co-creating social development plans with target communities.
	2	Based on review of viable alternative livelihood interventions, undertake iterative, participatory engagements with target communities, engaging with relevant ministries and government institutions, to design appropriate interventions for each target group.
	3	Write up a social development plan for each target community.
Lead actors		FMENV, FDF, FRIN, NPS

Sub-objective 7.3
Empower target local communities through alternative livelihood development

Expected output	7.3.1	Appropriate alternative livelihood interventions are established or strengthened and maintained.
Activity	1	Implement the social development plan for each target community.
Lead actors		FMENV, FDF, FRIN, NPS
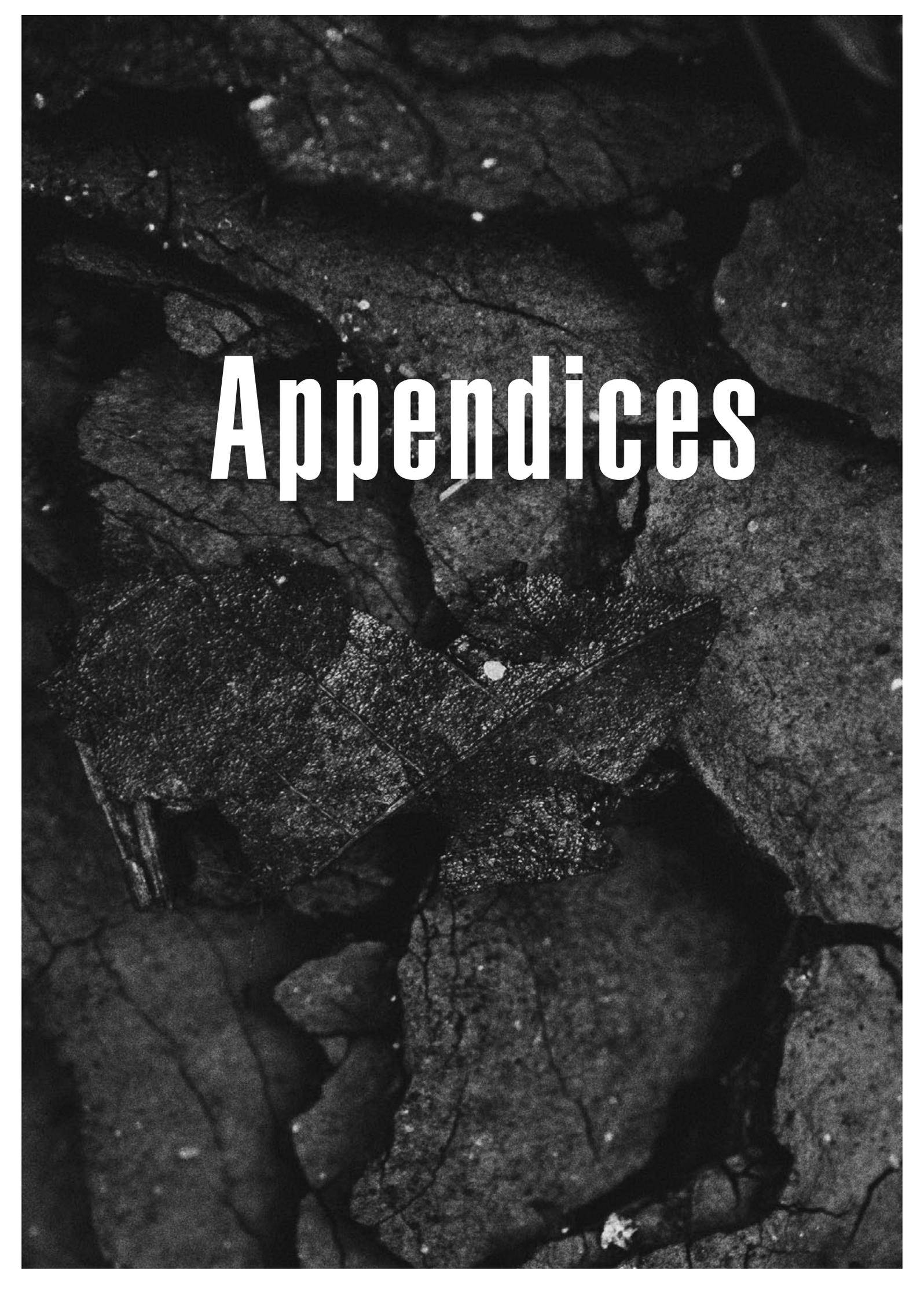
Appendices

Appendix A:
SWOT Analysis

Strengths	Weaknesses
Political	
▪ Political goodwill in relevant sectors ▪ Inter-agency, national, regional, continental, international cooperation between some stakeholders	▪ Lack of comprehensive implementation and weakness of national and international policy/legal frameworks on trafficking ▪ Limited mechanisms for inter-agency and non-state actor collaboration ▪ Wildlife crime is considered low priority ▪ Weaknesses within the political governance structure
Economic	
	▪ Limited financial capacity ▪ Loss of revenue with loss of natural capital, impacting foreign earning potential ▪ Limited incentives for stakeholders (government, enterprises, etc.) for protecting wildlife and the associated ecosystems due to competing economic interests for land outside protected areas
Socio-cultural	
▪ Support for livelihood and social development from intergovernmental organisations such as UNODC, UNEP, GEF, World Bank etc. ▪ Engaged civil society	▪ Communities lack knowledge of the intangible benefits of nature ▪ Insufficient investment to create alternative livelihoods ▪ Lack of awareness amongst law enforcement authorities, civil society and local communities on the importance of addressing wildlife and forest crime
Technological	
▪ Some surveillance and monitoring systems are being used by some enforcement agencies	▪ Lack of basic enforcement equipment (e.g. scanners) ▪ Inadequate technology for surveillance, monitoring and enforcement ▪ Lack of suitable databases for securely collating and analysing wildlife crime data ▪ Cybercrime attacks targeting databases

Strengths	Weaknesses
Legal	
▪ Presence of an enabling policy, legal and regulatory framework (wildlife, forestry, environment) ▪ A legal framework to combat wildlife crime is in place	▪ Wildlife crime not currently treated as a serious crime ▪ Current penalties are not sufficient to act as effective deterrents ▪ Lack of clarity on how non-environmental laws can be used to prosecute wildlife crime ▪ Limited accountability for confiscated wildlife products ▪ Lack of document credibility e.g. inconsistencies between CITES Act and CITES Regulations, ranging from species definitions to permit procedures ▪ Conflicting legal provisions between agencies e.g. Customs and Excise Act provides NCS powers to investigate and prosecute wildlife product seizures, while the NESREA Act gives NESREA powers to prosecute wildlife crime
Environmental	
	▪ Lack of baseline data on natural resources in Nigeria and the extent of wildlife crime to fully inform efforts to prevent and prosecute such crime ▪ Wildlife crime prevention efforts are not grounded in empirical data ▪ Loss of crop species resulting in a need to seek alternative food sources ▪ Increasingly fragmented landscape ▪ Insufficient mitigation of human-wildlife conflict ▪ Impact of biodiversity loss on climate change ▪ Lack of community participatory management approaches
Law enforcement	
▪ Whistle-blower protection and rewards (FMFBNP Whistle Blowing Policy) ▪ Some enforcement systems are in place and being used by some enforcement agencies	▪ Lack of a high-level strategic response to wildlife and forest crime ▪ Lack of support for crime scene management, intelligence sharing and data collection ▪ Inadequately trained, equipped and motivated staff ▪ Insufficient coordination / lack of agreed procedures for coordination ▪ Limited capacity to protect wildlife and forests ▪ Lack of adequate procedures and storage for disposal of confiscated specimens ▪ Porous borders

Opportunities	Threats

Political

▪ Enhance inter-agency, regional and international collaborative efforts ▪ Enhance regional coordination through establishing a regional West Africa Network to Combat Wildlife Crime and adopt the West Africa Strategy to Combat Wildlife Crime	▪ Regional political instability ▪ Presence of criminal organisations/networks within the region

Economic

▪ Enhance the wildlife economy to drive valuation of nature-based land use for example by incorporating payments for Ecosystem Services initiatives, taxes, and other financial modalities ▪ Development of conservation-compatible economic enterprises	▪ Sustained international demand for illicit wildlife, forest and marine products ▪ Other forms of serious criminal activities linked to and enabling wildlife trafficking in Nigeria

Socio-cultural

▪ Promote conservation friendly cultural practices/customs, and advocate for change of detrimental beliefs and customs ▪ Improve willingness and cooperation from non-state actors (NGOs, media, citizens)	▪ Negative impacts such as human-wildlife conflict cause disenfranchised communities who do not support nature conservation ▪ Insufficient investment in alternative livelihoods

Technological

▪ Adoption of validated technologies for enhanced surveillance, monitoring and forensic identification of specimens ▪ Online advertising and social media platforms can be leveraged to run 'stop wildlife crime' campaigns	▪ Risk of government IT infrastructure and databases being hacked

Opportunities	Threats
Legal	
▪ Amendment of provisions in the Wildlife, Forest and Environment Acts to provide for tougher penalties ▪ Develop a strong enforcement response to trafficking of wildlife and forest products based on legal framework analysis ▪ Establish a national Wildlife Crime Taskforce to ensure a coordinated and integrated approach ▪ Implementing the WAN can enhance regional impact in tackling wildlife crime	
Environmental	
▪ Incorporate marine aspects of wildlife crime into the National Strategy ▪ Leverage renewed global interest in climate change, biodiversity agendas ▪ Expansion of protected area network under post-2020 biodiversity framework, with Nigeria as one of 57 member countries of the '30 by 30 High Ambition Coalition'[61] and one of the member countries that has endorsed the 'Leaders' Pledge for Nature'[62]	▪ Effects of climate change leading to increased interaction between people and wildlife ▪ Human pressure on natural resources due to increased population growth ▪ Insecurity in forest areas
Law enforcement	
▪ Increased training, capacity building, and awareness-raising through international/ regional collaboration ▪ Establish mechanisms for multi-agency operations	▪ Cross-border crime - Presence of transnational criminal organisations within the region undermining law enforcement efforts ▪ High levels of illegal immigration introducing crime and stressing resources ▪ Porous borders

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61   The High Ambition Coalition (HAC) for Nature and People is an intergovernmental group of (currently) 70 countries championing a global deal for nature and people with the central goal of protecting at least 30 per cent of world's land and ocean by 2030. The 30x30 target is a global target which aims to halt the accelerating loss of species, and protect vital ecosystems that are the source of our economic security. Retrieved from https://www.hacfornatureandpeople.org/home

62   Political leaders participating in the United Nations Summit on Biodiversity in September 2020, representing 93 countries from all regions, and the European Union, committed to reversing biodiversity loss by 2030. By doing so, these leaders are sending a united signal to step up global ambition and encourage others to match their collective ambition for nature, climate and people with the scale of the crisis at hand. https://www.leaderspledgefornature.org

Appendix B:
Monitoring and evaluation of implementation

The monitoring and evaluation (M&E) component of the National Strategy to Combat Wildlife and Forest Crime in Nigeria provides a framework to track the implementation of the National Strategy and measure the impact of the interventions. It works on two levels, the details of which are to be developed as an action in the strategy.

1. Output tracking (tracking the work that is done)

2. Impact measurement (have we changed the situation to where we want it to be?)

Output tracking

The goal for output tracking is to ensure the interventions and actions within the National Strategy are being implemented as planned, and to ultimately understand if the objectives and goals of the National Strategy have been achieved. As part of action item 1.3.4, the lead actor(s) will need to define the KPIs and targets for each set of activities and outcomes at the very outset of the National Strategy. The achievements of these outcomes will be regularly reported to the NSF by responsible agencies. It is the responsibility of the NSF to track the progress of the implementation of the National Strategy, measured as the percentage of actions completed.

Impact measurement

The strategy aims to lay the foundations for change: i.e.,

By 2026, Nigeria has made demonstrable progress in reducing wildlife crime, while its law enforcement and criminal justice system have the requisite capabilities and a fit-for-purpose legal framework to effectively and collaboratively tackle wildlife crime.

The achievement of this can be measured by two metrics:

(a) Progress towards achieving the goal that Nigeria has a *law enforcement and criminal justice system that has the requisite capabilities* which can be measured using the ***ICCWC Indicator Framework for Combating Wildlife and Forest Crime*** (ICCWC Indicator framework). This is a complementary analysis to the ICCWC Toolkit that will be conducted by UNODC in 2022. The ICCWC Indicator Framework has been developed to be used alongside the ICCWC Toolkit, providing an additional assessment tool at the national level. While the ICCWC Toolkit provides the means for a comprehensive analysis, the ICCWC Indicator Framework allows for a more rapid assessment of the national law enforcement response to wildlife crime. Importantly, the ICCWC Indicator

Framework provides a standardised framework to monitor changes in national law enforcement capacity and effectiveness over time.

The ICCWC Indicator Framework is a set of 50 indicators corresponding to 8 desired outcomes of effective law enforcement to combat wildlife crime. The framework is meant to be a self-assessment and is most effective when completed through a collaborative process involving all relevant national law enforcement agencies. To monitor strategy implementation, the ICCWC Indicator Framework assessment can be coordinated under the aegis of the NSF. This should be done at the beginning of the National Strategy implementation, generating an ICCWC Toolkit assessment report, then during a mid-term review after two and a half years and at the end of the strategy.

(b) Progress toward ensuring that Nigeria has *a fit-for-purpose legal framework to effectively and collaboratively tackle wildlife crime* can be measured as the proportion of the recommendations resulting from the recent analysis of the Criminal Justice Legislative Framework in Nigeria that have been successfully implemented. These recommendations have been integrated into the action plan and can be readily reported on. However, there are several subjective recommendations that will need to be assessed by independent and suitably qualified persons. For example, success in the sensitisation of the judiciary at the federal and state level regarding wildlife crime, or the "building of capacity". These capabilities are best assessed by a suitably qualified person, who can report to the NSF after two and a half years and at the end of the implementation

Appendix C:
Resource mobilisation

Sources of funding

Financing the National Strategy in full will be challenging, given limited government resources and complex procedures for soliciting donor funding. It is proposed that the resources to implement this strategy are mobilised once it is complete and the budgets required for each activity are better understood. This allows government agencies to align their budgets with the strategic needs and create a resource mobilisation plan that can be used to attract funding from multilateral and bilateral institutional donors and partners, foundations and NGO partners. With a clear strategic plan and budget in place, these partners can fully understand the strategic approach and how it aligns with their own institutional priorities.

As detailed in the implementation coordination section, a Resource Mobilisation Taskforce should be convened, consisting of representatives from key NSF agencies, such as the Federal Ministry of Environment, the Federal Ministry of Justice, the Federal Ministry of Finance, the Federal Department of Forestry, the Federal Department of Fisheries, the Nigerian Customs Service and NESREA. The Taskforce must develop an outline of resources needed for each strategic activity, tasking the lead agencies for each activity to prepare budgets for implementation. Once a high-level budget has been prepared for delivering the National Strategy, the Taskforce can align these needs with agency budgeting processes. By having representation from the key agencies and ministries, the representatives will be well placed to report on their own agencies' budgets and ensure coordination of funding across all the key stakeholders. Where possible, each agency must ensure that their own institutional workplans align with the agreed National Strategy.

Engaging the FMFBNP regularly will not only help prioritise the issue at the highest level, but also allows the FMFBNP to better understand what is required to effectively tackle this critical issue. The Taskforce can lobby the FMFBNP to make financial commitments to tackling wildlife crime, as it will require significant resources, political will and government commitment to deliver. Increasing budgets to tackle wildlife crime every year will prove that the Federal Government of Nigeria is serious about tackling wildlife crime.

The chances of successful implementation success will be enhanced through the effective engagement of international support, including bilateral and multilateral agencies, and NGO partners. The NGO sector has an important role to play in supporting implementation but there is a danger that each actor works in isolation. The Resource Mobilisation Taskforce should work regularly with NGO partners to coordinate and plan implementation, and collectively report on what has been delivered. As part of this exercise, the Taskforce can understand what sections of the resource requirement have been covered from other sources. The NGO sector are effective fund-raisers particularly where they can clearly demonstrate that they are delivering activities at the request of the Federal Government of Nigeria. By regularly convening NGO partners through the proposed implementation framework, it will also be possible to identify which activities are not being supported and funded adequately, and to jointly raise funds to cover those shortfalls.

The international donor community may be able to assist in areas with shared objectives. An initial priority must be to identify these donors and garner their financial support for implementing the National Strategy. External partners can mobilise resources for implementation, provide technical support, and help raise the profile of the agenda at the national level and enhance political support. Nigeria needs to work closely with its donor community to ensure their support, proactively engaging with them, and regularly and promptly communicating emerging needs and status of progress on implementation of bilateral programmes of work. The Resource Mobilisation Taskforce should identify focal points with key donors and ensure there is a dedicated individual tasked with regularly engaging with that donor. Engagement should include communications and updates, invitations to events and workshops, and even field visits so that they understand the challenges faced and how their funds have supported combating wildlife crime. Bringing donors to the field allows them to understand the scale of the issue and meet the teams that will be tasked with implementing the activities that they fund. Ultimately, donors like to know where their funding is going, and whether the team is effective and dedicated. It is critical to understand the priorities of each donor and align needs and donor priorities. Finally, one cannot over emphasise the importance of providing visibility to donors – this is important if one is to attract repeat support. Larger multilateral and bilateral donors are more likely to fund activities where:

a) the activities are part of a clearly defined National Strategy;

b) it is clear that all partners are working collaboratively within a structured workplan;

c) the team implementing the activities are capable and dedicated;

d) the private sector is partnering closely with the national authorities – this approach merges the efficiencies and accountability of the private sector with the mandate and authority of the Government (accountability of funds will be critical for most donors and often requires management of funds to be conducted by an NGO or multilateral agency).

Appendix D:
Process for developing the National Strategy

The National Strategy to Combat Wildlife and Forest Crime in Nigeria was developed during 2020-21, following an iterative and consultative process. The coordination of the process was led by UNODC, with the objective of ensuring buy in from all relevant stakeholders, enhancing the chances of successful implementation. Consultants were engaged to develop a strategy outline, which was then finalised following review by the key stakeholder group and a virtual roundtable (Appendix F).

a) Background documentation was prepared prior to partner meetings and the National Strategy workshop. This included a standard questionnaire (Appendix E) for the key stakeholder group.

b) A subset of individuals from the key stakeholder group were interviewed by the consultants to discuss their responses to the question template.

c) A workshop was hosted in Abuja from the 17th to 21st May 2021, facilitated by UNODC and the consultants and attended by a subset of the key stakeholder group. The workshop had structured group sessions to develop a draft Vision, Goals, Objectives, Outcomes and Implementation Framework.

d) The consultants wrote the first draft of the National Strategy, based on the agreed outline document.

e) The first draft was presented to the key stakeholders for comments.

f) A virtual roundtable was conducted with the key stakeholders to discuss the first draft.

g) The National Strategy was further developed through two rounds of iterative review with the key stakeholders until a final National Strategy was agreed upon. This was completed through a validation workshop.

h) The final strategy was presented to the key stakeholder group and key decision makers at each of the major agencies.

Figure 9:
Roadmap for the development of the National Strategy

Preparation	Consultations	Draft Strategy	Finalise
Finalise strategy outline	Partner meetings — Workshop	Write strategy draft — Present draft strategy	Present draft strategy — Write final strategy
Prepare background documentation		Situational analysis	Present draft strategy
		Logframe objectives	
		Implementation	
		Strategic actions	
		M&E Framework	
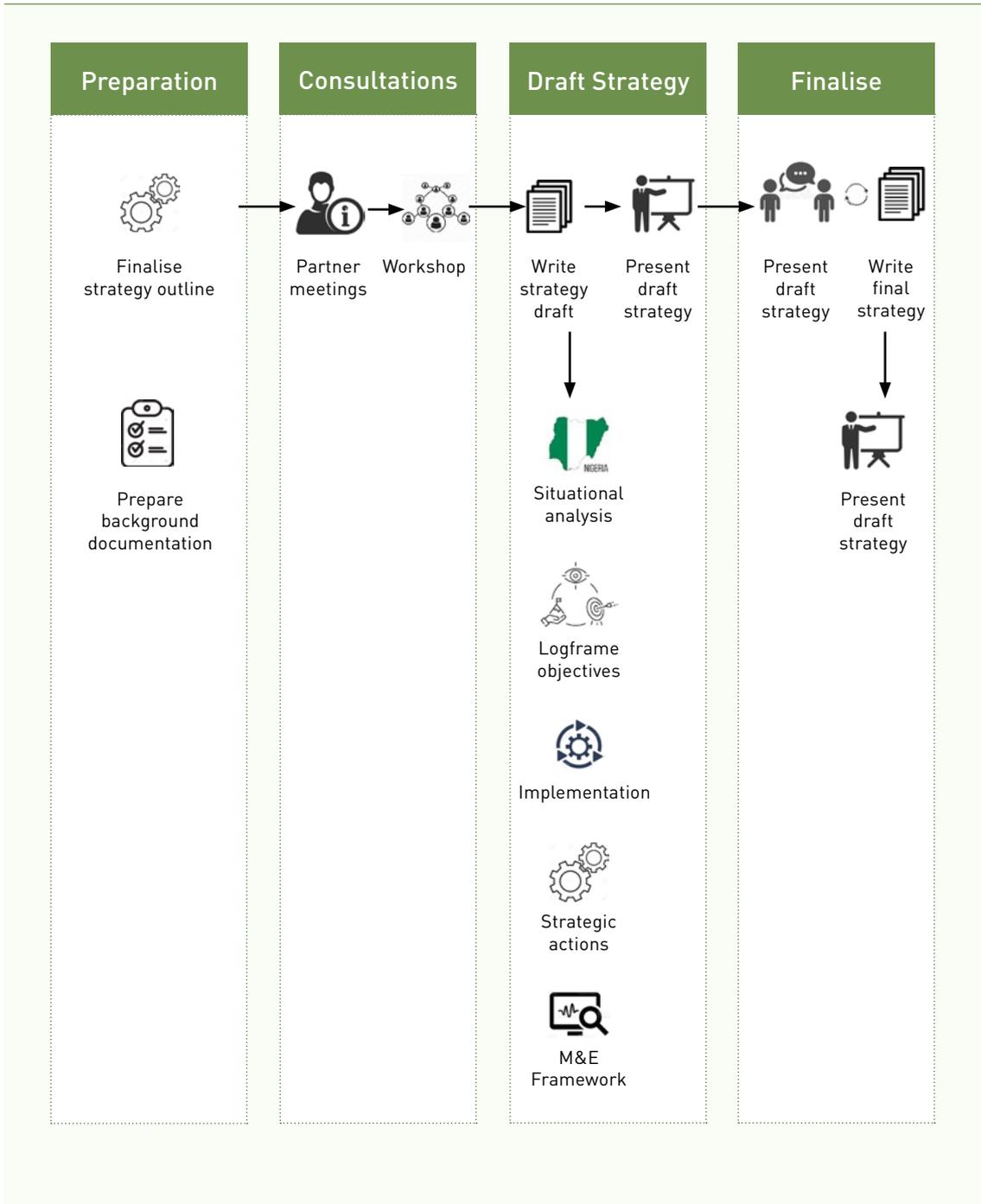
Source: developed during the Workshop.

Appendix E:
Key informant questionnaire for partner meetings

Interviewee(s):
Organisation:
Date:

1.   Situational analysis: where are we now?

Before the development of a new vision and strategy, it is necessary to explicitly define the status and trends of wildlife crime in Nigeria, who the partners are, their roles and responsibilities and the relationships between them. The publicly available literature paints a particular picture of the status and trend of wildlife crime in Nigeria, but we would like to understand the organisational perspective. The following section is to be filled in from the perspective of the organisation which you represent.

1.1.   Your organisation's role and responsibilities (from your organisation's perspective)

1.1.1.   What is the role of your organisation in addressing wildlife crime in Nigeria, what is your organisational mission, what activities does your organisation undertake, and what is your legal mandate?

1.1.2.   How are your activities to combat wildlife crime funded?

1.1.3.   What human resources capacity does your organisation have to combat wildlife crime (feel free to provide an organisational chart)

1.1.4.   Briefly, who are the other partners that you work with and what is their role in addressing wildlife crime?

1.2.   Mapping external stakeholders

1.2.1.   Who are the most critical stakeholders (you may or may not work with them directly) in combating wildlife crime in Nigeria, and what roles do these stakeholders perform?

1.2.2.   What are the main sources of finance for combating wildlife crime in Nigeria?

1.2.3.   Please highlight any other external stakeholders (not including those mentioned above) which we should be meeting with during the development of the strategy, and why?

1.3.   Status of wildlife crime in Nigeria

1.3.1.   Briefly explain the wildlife crime supply chain in Nigeria (if appropriate, feel free to differentiate between types of wildlife crime as you see fit. For example, by species or by domestic vs international crime).

1.3.2.   What do you see as the major drivers of international and of domestic wildlife crime in Nigeria?

1.3.3.   What do you see as the major drivers of why Nigeria acts as a transit hub for regional wildlife crime?

1.3.4.   What change do you think would have the biggest impact on wildlife crime in Nigeria, and why?

1.4. Legal frameworks and agreements

1.4.1. Which are the important frameworks and legal agreements that we must be aware of in the development of this strategy?

1.4.2. Are there any legal frameworks or agreements under development that will significantly enhance Nigeria's capability to combat wildlife crime?

1.4.3. In your opinion, are there any legal frameworks or agreements that need to be developed to enhance Nigeria's capability to combat wildlife crime?

1.5. SWOT analysis

1.5.1. Do you have any further comments on the SWOT analysis presented in Appendix A?

2. Vision and goal setting: where are we going?

We will be developing a vision in conjunction with the various stakeholders. This vision should outline the desired state of wildlife crime in 20–25 years. From this vision, we can work backwards to determine what behaviour changes need to happen for this to occur. Subsequently, we will derive the strategies together that will allow us to generate these behaviour changes.

2.1. What is your suggested vision for the status of wildlife crime in Nigeria in 25 years (A vision should be ambitious)?

2.2. Given the situation described above, what changes to the state of wildlife crime need to occur?

2.3. For us to achieve this, what outcomes (behaviour changes) are needed?

2.4. What are realistic goals for the 5-year strategy to aim to achieve (the goal should be specific and measurable if possible)?

Figure 10:
Strategy vision workflow.
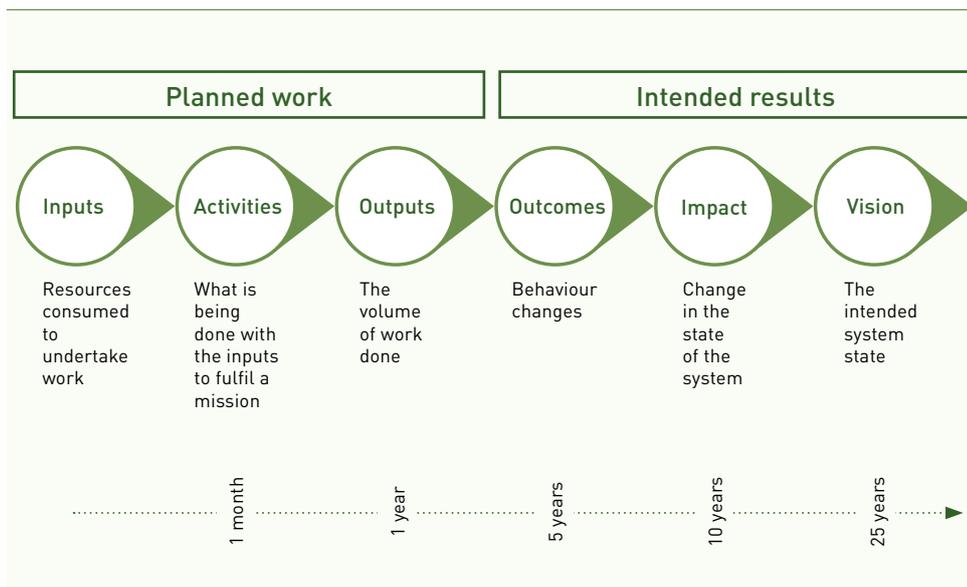
Source: developed during the Workshop.

3.   Strategy development: how do we get there?

3.1.   What do you see as the most critical elements for successfully implementing the suggested strategy?

3.2.   What do you see as the biggest challenges for successfully implementing the suggested strategy?

3.3.   What capabilities are already present for Nigeria to deliver the suggested strategy?

3.4.   What capabilities are required for Nigeria to deliver the suggested strategy?

4.   Monitoring and evaluation: how will we know?

4.1.   Which is the most valuable source of information/data on wildlife crime in Nigeria?

4.2.   Does your organisation have any established Monitoring and Evaluation (M&E) systems for measuring success in combatting wildlife crime?

4.3.   How does Nigeria collate and analyse wildlife crime data?

5.   Open questions

Do you have any comments or recommendations?

Appendix F:
Key stakeholders during the development of the National Strategy

	Name	m/f	Organisation	Designation	Workshop attendee	Interviewee
1	H.E Chief Sharon O. IKEAZOR	f	Federal Ministry of Environment	Hon. Minister of State		
2	Razak Kolawole ADEKOLA	m	Federal Ministry of Environment	Director, Forestry		y
3	Timothy Daniel JOHN	m	Federal Ministry of Environment	Head of Wildlife and CITES Management Division		y
4	Matthew Olufemi OKUNUGA	m	Federal Ministry of Environment	Chief Forest Superintendent		
5	Felix AJOGWU	m	Federal Ministry of Environment	Senior Scientific Officer, Dept of Forestry		
6	Dr Priscilla Mbarumun ACHAKPA	f	Federal Ministry of Environment	Special Adviser to the Honorable Minister of State for Environment		
7	Odafe Blessing OMOVOH	f	Federal Ministry of Environment			y
8	Prof Aliyu JAURO	m	National Environmental Standards and Regulations Enforcement Agency (NESREA)	Director General/CEO		
9	Gbenga Joshua KOLAWOLE	m	NESREA	Head, Conservation Monitoring		y
10	Haruna Nzwak JOEL	m	NESREA	CITES Desk Officer		y
11	Miranda AMACHREE	f	NESREA	Director, Inspection & Enforcement (I&E)		
12	Simon B. JOSHUA	m	NESREA	Director, Environmental Quality Control (EQC)		
13	Dutse SALKA	m	NESREA	Director, Partnership and Education (P&E)		
14	Bola BRAIMOH-TOKURA	f	NESREA	Director, Legal/Legal Adviser		
15	Beka Nenpomigyi CHRISTOPHER	m	NESREA	Asst. Director, Land Resources and Watershed Management (LR&WM)		
16	Raph NNAM	m	NESREA	Director, Policy Planning Analysis		
17	Bello MAKAMA	m	NESREA	SA to DG/CEO		
18	Isa ABDULSALAM	m	NESREA	Director, Special Duties		
19	Sambo I. ABUBAKAR	m	NESREA	Director, Admin and Finance		
20	Agbor HAPPINESS	f	NESREA	Wildlife Officer		
21	Ohaeri SILVALINE		NESREA	Wildlife Officer		
22	Clement UWEMEDIMO	m	NESREA	Wildlife Officer		
23	Nsor Odey NSOR		NESREA	Wildlife Officer		

	Name	m/f	Organisation	Designation	Workshop attendee	Interviewee
24	Col. Hameed Ibrahim ALI	m	Nigeria Customs Service (NCS)	Comptroller General		
25	Abimbola ANIMASHAWUN	f	NCS	NCS National Contact Point for WCO's Regional Intelligence Liaison Office (West Africa), Technical and Operational Advisor on IWT		y
26	Isah UMAR	m	NCS	Deputy Comptroller Operations		
27	Adamu Sani KANGIWA	m	NCS	Intelligence Operative	y	
28	Kazeem Idowu AKANO	m	NCS	Intelligence Operative	y	
29	IBRAHIM M. GONI	m	Nigeria National Park Service	Conservator General		
30	D. ALIYU	m	Nigeria National Park Service	SA Social Media and Strategic Relations		
31	Henry Manyo NDOMA	m	National Parks Service	Conservator of Park, Planning and Statistics	y	
32	Janet AWANEN	f	Federal Ministry of Justice		y	
33	Adaeze Onyeka NWOKEDI	f	Federal Ministry of Justice		y	
34	H.E Dr Mohammad Mahmood ABUBAKAR	m	Federal Ministry of Agriculture and Rural Development	Hon. Minister		
35	Gideon Kodichimma ORJI	m	FMARD- Fisheries Department	Principal Fisheries Officer	y	
36	Dr Vincent ISEGBE	m	Nigeria Agricultural Quarantine Service	Director General		*
37	Ibrahim ABUBAKAR	m	Federal Ministry of Agriculture and Rural Development	Director, Fisheries Department		
38	Prof Adeshola ADEPOJU	m	Forestry Research Institute of Nigeria (FRIN), Federal Ministry of Environment	Director General/CEO		y
39	Prof Abiodun Solomon KEHINDE	m	FRIN		y	
40	Abdulrasheed BAWA	m	Economic and Financial Crimes Commission (EFCC)	Chairman		
41	Aliyu Aminu WALI	m	EFCC	Ag. Head, External Cooperation		y
42	DCDS Saliu KADIR	m	EFCC	Team Lead, Wildlife and Forest Crime	y	
43	Michael KAYANKA	m	EFCC	External Liaison Officer		y
44	Biola SHOTUNDE	f	National Financial Intelligence Unit (NFIU)	Associate Director, Intelligence and Investigation		
45	Kelechi ONWUEGBULE	m	Nigerian Financial Intelligence Unit (NFIU)	HoD Natural Environment and Wildlife Trade Crimes	y	

	Name	m/f	Organisation	Designation	Workshop attendee	Interviewee
46	Emmanuel Oladotun AJAYI	m	Nigerian Postal Services (NIPOST)	Chief Investigation Officer	y	
47	Dr Patricia ANYANMU	f	National Institute of Oceanography and Marine Research (NIOMR)			
48	Oyeronke ADEGBILE	f	NIOMR	Chief Research Officer Marine Biology Section, Fisheries Resources Dept.	y	y
49	Justina OBIENU	m	NIOMR		y	y
50	Dr Nathaniel Oluranti BANKOLE	m	National Institute of Freshwater Fisheries Research (NIFFR)	Executive Director/CEO	y	
51	Prof Rebeccah NDANA	f	University of Abuja		y	
52	Lamir Hassan MUKHTAR	m	Federal Airports Authority of Nigeria (FAAN)	SA to CEO FAAN and Assistant Chief Bird/ Wildlife Hazard Control Officer	y	
53	Hamza BUKAR	m	Arik Air		y	
54	Oliver STOLPE	m	United Nations Office of Drugs and Crime (UNODC)	Representative, Country Office for Nigeria		
55	Jorge Eduardo RIOS	m	UNODC	Chief, Global Programme for Combating Wildlife and Forest Crime		
56	Jenna DAWSON-FABER	f	UNODC	Programme Officer		
57	Lejda TOCI	f	UNODC	Programme Officer		
58	Julie VIOLLAZ	f	UNODC	Wildlife Crime Research Officer		
59	Folusho AJAYI-ADELEKAN	f	UNODC	National Programme Officer/Project Coordinator	y	
60	Princess CHIFIERO	f	UNODC	National Programme Officer	y	
61	Rezaun MERCY	f	UNODC	Research Associate	y	
62	AJ JAGELSKI	m	US Embassy	Environment, Science, Technology and Health Officer		
63	Linda ODUME	f	U.S. Embassy	Economic Assist. for Env, Science, Tech, and Health		
64	Evans MAKAMA	m	INTERPOL		y	
65	Moshood Abiodun ARO	m	PROWPMAN		y	
66	Joseph ODIASE	m	Tropical Wood Exporters Association of Nigeria (TWEAN)			
67	Arnold JACKSON	m	Nigeria Export Promotion Council			

	Name	m/f	Organisation	Designation	Workshop attendee	Interviewee
68	Dr Sab EBIRIEKWE	m	Raw Materials Research and Development Council	Deputy Director: Bioresources/Biodiversity Management and Plantation Development		*
69	Andrew DUNN	m	Wildlife Conservation Society (WCS)	Country Director		y
70	Yohanna SAIDU	m	WCS		y	
71	Solomon ADEFOLU	m	Nigerian Conservation Foundation (NCF)			y
72	Dr Joseph Daniel ONOJA	m	NCF	Director, Technical Programmes	y	y
73	Tunde MORAKINYO	m	Africa Nature Investors Foundation	Executive Director		y
74	Wilson OGOKE	m	Africa Nature Investors Foundation	Lead Policy Coordinator, EIA-ANI Project	y	y
75	Mary RICE	f	Environmental Investigation Agency (EIA)	Executive Director		y
76	Shruti SURESH	f	EIA	Deputy Campaign Lead (Wildlife)		y
77	Philip REKRET	m	EIA	Project Officer		y
78	Rachel MACKENNA	f	EIA	Wildlife Campaigner		y
79	Chris HAMLEY	m	EIA	Lead on Pangolin Campaign		y
80	Alice STROUD	f	Born Free USA	Africa Policy and Capacity Building Director, Wildlife Crime Consultant		
81	Charles MACKAY	m	Born Free USA	Wildlife Crime Consultant		y
82	Sean O'REGAN	m	Born Free USA	Wildlife Crime Consultant		y
83	Rabiu ABUBAKAR	m	Department of State Service	Representative		y
84	Adesuwa OBASUYI	f	British High Commission	Climate Change Policy Manager		y
85	Edward VAN ASCH	m	CITES			*
86	Pia JONSSON	f	CITES			*
87	Johannes STAHL	m	CITES			*

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*   Provided comments