UNDERSTANDING THREATS TO WEST AFRICAN BIODIVERSITY AND LINKAGES TO WILDLIFE TRAFFICKING

GHANA FIELD ASSESSMENT REPORT

AUGUST 2018
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Cover photo: An African elephant in Mole National Park. Credit: David Aduama
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ACRONYMS

CITES  Convention on International Trade in Endangered Species of Wild Fauna and Flora
ECOWAS  Economic Community of West African States
GPS  Ghana Police Service
MoU  Memorandum of Understanding
NCB  National Central Bureau
USAID  United States Agency for International Development
WA-BiCC  West Africa Biodiversity and Climate Change program
WCO  World Customs Organization
1.0 INTRODUCTION

1.1 BACKGROUND INFORMATION ON GHANA

Ghana has 28.2 million inhabitants and a gross domestic product of USD 42.69 billion (World Bank, 2018). Ghana’s key trade partners are South Africa, the United Arab Emirates, Italy, Switzerland and France for exports, and China, United States, United Kingdom, Belgium and India for imports. Ghana has one international airport located in its capital, Accra, and two main seaports, the Tema Port and Takoradi Port. Ghana is a key location for international trade in the West African region as it shares borders with Burkina Faso, Togo and Ivory Coast.

Ghana is also characterized by rich biodiversity. The country has a total of 3,600 species of flora, with 221 species of amphibians and reptiles, 728 species of birds and 225 mammalian species. A full biodiversity profile will be available in a report devoted to the analysis of key biodiversity threats.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) went into effect in Ghana in 1976. The country is listed in category 3 of the CITES national legislation project which means that its legislation is believed generally not to meet any of the four requirements for effective implementation of CITES.

Most of Ghana’s legal commercial exports are live specimens of Appendix II species. Between 2000 and 2016, international commercial trade in wild specimens of CITES-listed species from Ghana was focused primarily on live reptiles and scorpions (see Annex 1).

Figure 1: Map of trade routes used for the export of wild specimens from Ghana (all purposes combined) between 2000 and 2016. Source: CITES Trade Database. Graphic representation produced using TradeMapper.

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2 https://www.cbd.int/countries/profile/default.shtml?country=gh
Trade levels reported in the CITES trade database between 2000 and 2016 indicate that during that period, for all sources and purposes combined, most of the species traded were reptiles (17 percent of which were royal pythons, *python regius*), and 7 percent of the total species traded were emperor scorpions (*pandinus imperator*). A graphic representation of trade routes used for reported legal international trade of wild specimens from Ghana during this period is included above.

### 1.2 METHODOLOGY AND SCOPE OF THE ASSESSMENT

The mission, organized in Ghana from May 21–28, 2016, was led by Nana Kofi Adu-Nsiah, Executive Director, Forestry Commission, Wildlife Division, CITES Management Authority of Ghana. The assessments took place in Accra and at the Aflao border post between Togo and Ghana (see map below). Interviews primarily targeted environment, customs and enforcement officers. A list of interviewees and the full schedule of the threat assessment is included in Annex 1 of this document. Secondary data was collected in the form of publications, reports, databases, maps and photographs, while primary data was collected through direct interviews with various categories of stakeholders.

The assessment team collected qualitative and quantitative data during its interviews. Quantitative data was recorded via the use of smartphones. Field surveys were conducted during a 6-day visit to the country as defined in Annex I. These visits included direct observation in at least one major market renowned for selling animal products. There were also interviews with various stakeholders at the Aflao border crossing post, the Kotoka international airport, the Tema Sea Port, various government offices, and Conservation or research institutions. The interviews chiefly targeted authorities responsible for the environment, enforcement officers (police, customs and the national office for Interpol), and NGOs. A list of interviewees and the full schedule of the threat assessment is included in Annex 11 of this report. Stakeholders were selected based on a stakeholder mapping carried out with the National CITES Authorities prior to the field trip. Additional institutions were identified through interviews with the pre-selected resource persons based on the snowball approach. The following data collection tools were used to provide a series of core questions that the survey team adapted to the context and field realities as necessary:


- A questionnaire for customs authorities, which was divided into two series of questions: open-ended questions and questions with multiple-choice, Yes/No or numerical responses.

- A questionnaire for non-governmental organizations and other stakeholders working on conservation issues.

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4 CITES trade database: [https://trade.cites.org/#](https://trade.cites.org/#)
A checklist for market visits to be used as part of an “undercover investigation,” where a team visits the market, spots the shops with wildlife products and records findings on smart phones using the checklist.

Responses to open-ended questions were recorded by hand and compiled daily into a report. Responses to questions with multiple-choice response options were recorded on smartphones, which allowed the National CITES team to collect and analyze the data in real-time. A smartphone tool was used, demonstrated in the following 3-minute video: https://www.youtube.com/watch?v=ZSRpYmtNak4. The assessment team included:

- Kofi Adu-Nsiah, CITES Management Authority of Ghana
- Charles Van Niekerk, Chief Analysis Officer–Africa, Freeland (enforcement expert)
- Charles Mackay, M.K. Wildlife Consultancy (customs expert)

Figure 2: Map of assessment sites visited in Ghana. Source: www.mapofworld.com.
2.0 ASSESSMENT OF WILDLIFE TRAFFICKING AT MARKETS AND ENTRY POINTS

2.1 VISIT TO THE BUSHMEAT AND CRAFT MARKETS OF ACCRA

The assessment team visited two markets in Accra, the bushmeat and the craft market. The bushmeat market was spread over a large area, but in places stalls were packed closely together, making it difficult to move through the avenues when it was busy. From the team’s observations, there was a huge quantity of mostly dried/smoked fish, snails and small amounts of cane rats. Forestry told the team that they had not found any illegal wildlife specimens for sale on the market a few months prior. Research indicated that the bushmeat trade had taken a big hit due to the Ebola outbreak, which was directly linked to bushmeat trade and consumption. This could explain why the team did not find any wildlife specimens available.

Visits to the craft market yielded similar results: no wildlife specimens were openly displayed for sale. A couple of months before the team’s visit, a shop owner was arrested in the craft market for possession of ivory. This could explain why no wildlife products were found for sale. Inquiries with shop owners about the availability of wildlife specimens for sale failed to generate additional information.

Photo 1: Bushmeat Market, Accra. Source: Charles Niekerk
2.2 AIRPORT

Kotoka International Airport in Accra is the only international airport in Ghana and is used by more than 25 airlines.

All freight scanned prior to export and import are processed via an automated system, where risk profiles determine which shipments will be examined and which can go through without intervention. Live animals also go through physical examination by the customs and wildlife officers, as well as veterinary services and aviation security. There were five different disciplines mentioned to the team: exports, imports, compliance, examinations, and investigations (enforcement and intelligence are also involved but were not mentioned to the team). All managers stated that none of the staff had been trained on CITES. The examination officers mentioned that there were risk profiles set on the system but weren’t sure what they were. It can be assumed that there is one for license identifiers, which will probably flag live animal exports for documentary and possibly physical examination.

There is a process for assigning risk profiles for imports/exports of freight. Customs use the automated clearance system for freight; customs entries are either green (low risk, cleared automatically), yellow (medium risk, necessitates document check, such as licenses), or red (high risk, goods to be examined). Risk profiles are set centrally and, according to airport cargo managers, they include CITES.

Details of CITES seizures in freight between 2010 and 2016 at the Kotoka international Airport and various borders are shown in Table 1 below.

Table 1: Seizures of CITES specimens at various ports and borders of Ghana between 2010-2016

<table>
<thead>
<tr>
<th>Entry point (Ghana/Cote d'Ivoire)</th>
<th>Specimen</th>
<th>Year of seizure</th>
<th>Quantity</th>
<th>Country of origin</th>
<th>Country destination</th>
<th>Concealment method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elubo Border</td>
<td>African Grey Parrot (Psittacus erithacus)</td>
<td>2010</td>
<td>150</td>
<td>Cote D'Ivoire</td>
<td>Togo</td>
<td>Not Concealed</td>
</tr>
<tr>
<td>Kotoka International Airport</td>
<td>African Grey Parrot (Psittacus erithacus)</td>
<td>2010</td>
<td>6</td>
<td>Unknown</td>
<td>Unknown</td>
<td>Not Concealed</td>
</tr>
<tr>
<td>Elubo Border</td>
<td>African Grey Parrot (Psittacus erithacus)</td>
<td>2013</td>
<td>51</td>
<td>Cote D'Ivoire</td>
<td>Togo</td>
<td>Not Concealed</td>
</tr>
<tr>
<td>Elubo Border</td>
<td>African Grey Parrot (Psittacus erithacus)</td>
<td>2013</td>
<td>96</td>
<td>Benin</td>
<td>Cote D'Ivoire</td>
<td>Concealed in Sacks</td>
</tr>
</tbody>
</table>

Source: Wildlife Division-Forestry Commission

According to the Wildlife Division, after the field assessment, 60 African Grey Parrots (Psittacus erithacus) and 98 Senegal Parrots (Poicephalus senegalus) were confiscated at the Kotoka International Airport in 2017. The two consignments were from Cameroon and Togo destined for Hong Kong and Thailand respectively.

The assessment team noticed that the airport is equipped with an x-ray machine to assist with examinations and sniffer dogs which are used for narcotics or explosives.
Ghana is a major exporter of live animals, largely reptiles, and the Veterinary Service and wildlife officers are responsible for checking these animals. Customs check the CITES permits and will only clear shipments when they have a signed release note from the Veterinary Service. They endorse the CITES permits and return a copy to the Wildlife Division of Forestry Commission, which informed the team that the permits are not always completed properly.

The Veterinary Service reported that they do not examine some shipments of reptiles at the airport because they do not have adequate skills, such as handling and identification, or a suitable place to do it. Shipments are checked at the exporter’s premises prior to being moved to the airport. Verification of documents, as well as welfare and health of the animals, are checked by wildlife and veterinary officers before final authorization.

At the airport the boxes and bags of wildlife specimens are examined externally in front of the warehouse in the open air. They rely on importing countries to do thorough checks.

It was evident from examining previous shipping documents that there are many CITES species being exported, including tortoises, chameleons, pythons, monitor lizards, scorpions and others.

The team spoke to a Plant Health officer who said he only sees fruit, vegetables and a few plants, but none were CITES-listed. He did indicate when asked that he didn’t know anything about CITES but would welcome some training.

In the passenger terminal, twelve customs officers per shift deal with around 800 to 1,000 international passengers a day. The main airlines they target are Ethiopia, Kenya and Emirates. They have direct access to airline computer systems for profiling passengers, and their priorities are revenue, narcotics and weapons. All passenger baggage is x-rayed on arrival and sometimes police dogs are used for narcotics. They mentioned that customs is planning to have its own canine unit, maybe by the end of the year.

None of the customs officers have been trained on CITES and know little about it. Wildlife and Veterinary officers support the custom officers on CITES issues. They had presumed that traffickers would be discouraged because controls are tight at the airport. Authorities are very keen to have officers receive training so they know what to look for.

Customs officers seemed to have a good relationship with security, although no CITES specimens had been referred to them. It can be assumed they had never received any training either.
2.3 SEAPORT OF GHANA

There are two ports in Ghana, the Tema Port and Takoradi Port. The team visited the Tema Port, which is the largest transit point for cargo destined for the landlocked countries north of Ghana (such as Burkina Faso). The port of Tema hosts vessels registered in various countries, including Nigeria, Hong Kong, Togo, China, Tanzania, and Luxembourg.

The team met with the Sector Commander, who explained that a reorganization of the staff was in progress. The staff is now composed of a total of 500 officers, with around 150 officers working 24/7. It was mentioned that customs officers required training to raise standards and that training for customs officers needs to be harmonized regionally to ensure that all countries are working to the same standards.

The port’s customs team has an intelligence and risk management unit based at the port that sets the risk profiles, but it does not appear there are any risk profiles set for CITES. Their priorities are revenue, narcotics, currencies and illegal weapons.

Containers for export are checked at the trader’s premises and put under a customs seal, which is checked on arrival at the port. The team was told that customs officers inspect 100 containers per day, but their decision to do a complete or partial search depends on the degree of risk.

Customs officers have access to a scanner and a police sniffer dog trained for narcotics detection.

None of the customs officers working in the port received CITES training. The Principal Revenue Officer indicated that he had learned about CITES through the Internet, specifically the CITES website, which he looked up out of interest. He also mentioned that he would be very pleased to be a trainer or contact point should that be part of the recommendations. Areas he considered as needs for customs were:

- Interagency cooperation, which is important to ensure proper coordination and pooling of expertise;
- Creating a network within customs so that frontline officers can be provided with expertise;
- Enabling information flow to assist with targeting crime;
- Providing materials to help with identification, law, and contacts.

2.4 LAND BOUNDARY BORDER POSTS

The team visited the Ghana-Togo border crossing point at Aflao and met the Sector Commander. The control area is considerably larger than those seen by the team in Togo and Burkina Faso, and all cargo is cleared there rather than inland. There are 256 staff working at the border post handling around 150 vehicles passing through per day, of which around 100 are carrying freight.

There is an automated freight system for freight clearance and the risk profiles are set centrally. The Compliance Verification section checks customs entry documents and refers freight for examination if officers consider something to be suspicious. Although they do not have an intelligence unit based there, the Sector Commander is trying to push the head of the preventive section to profile cargo, particularly exports.

There is a scanner to check freight lorries, buses and other vehicles, which has minimized the number of smuggling cases, such as narcotics and firearms.
The Wildlife Division of the Forestry Commission is not based at Aflao, but apparently documents are endorsed before arriving at the border post. Plant Protection and Regulatory Services of the Ministry of Food and Agriculture and Port Health have a presence at the border post. There is an onsite chemist who ensures goods are compliant and use the right Customs Tariff Code. Customs officers meet regularly with Border Security and have operated jointly in the past, though not recently. Furthermore, a Preventive Unit is responsible for checking personal vehicles, buses and their passengers. The vehicles are put through the scanner.

The customs officers interviewed indicated knowing little about CITES and did not believe any of their staff had been trained. There have been no seizures of wildlife/products in the last three years.

To strengthen the fight against wildlife crime at this site, the officers recommended:

- Sensitize top management so that wildlife law enforcement is considered as a priority;
- Provide training directly for staff at the border post, as normally a small number of officers leave to be trained and don’t give any feedback when they return;
- Provide manuals to help with identification and legal information to assist officers;
- Ensure that information flows so officers know what is going on and what they should be prioritizing and looking for in their controls.
3.0 OVERVIEW OF WILDLIFE LAW ENFORCEMENT

3.1 PROACTIVE ENFORCEMENT AS A DETERRENT TO WILDLIFE TRAFFICKING

3.1.1 ENFORCEMENT PRIORITY

Combating wildlife trafficking in Ghana is sometimes identified as a high priority among national law enforcement agencies. The Ghana Police Service (GPS) is the main law enforcement agency. The Service is under the control of Ghana’s Ministry of the Interior. The Head of INTERPOL NCB-Accra GPS expressed that wildlife trafficking is a high priority and the police will attend to investigations or operations when required. The Deputy Head of INTERPOL NCB-Accra expressed that there is not enough sensitization about the concept of wildlife trafficking with law enforcement authorities. The Head of INTERPOL NCB-Accra also noted that there needs to be more training and on-the-job training/mentoring regarding wildlife trafficking.

Evidence of other formal recognition, such as reference to wildlife trafficking as a priority issue within strategic plan(s) and Memoranda of Understanding (MoUs), were not provided to interviewers when requested.

3.1.2 SERIOUS CRIME

Wildlife trafficking in Ghana is recognized as a transnational organized crime, which is considered a serious crime. The United Nations Convention Against Transnational Organized Crime defines serious crime as conduct constituting an offence punishable by imprisonment for at least four years or a more serious penalty. Ghana’s wildlife legislation does not include a penalty sufficient to meet the definition of a serious crime at the national level. However, wildlife offenders sometimes get adequate punishment for their crime.

3.1.3 NATIONAL ENFORCEMENT STRATEGY

A national enforcement strategy and/or action plan for wildlife trafficking has not been developed. Wildlife trafficking is not covered by any other relevant enforcement strategies or action plans and has not been adopted by relevant national enforcement agencies. However, there are existing local regulations and baseline documents on conservation and wildlife trade. These documents are not current and need to be revised.

3.1.4 NATIONAL COOPERATION

Inter-agency cooperation among national law enforcement agencies to combat wildlife trafficking takes place rarely and on an ad-hoc basis depending on the specific operational context, situation or problem encountered and is normally driven by the Wildlife Division of the Forestry Commission. Besides ad-hoc
cooperation initiated by a telephone call, there is no formal process or structure. According to officials at the Wildlife Division, attempts to establish networks collapsed due to financial challenges. No examples of formal mechanisms for inter-agency cooperation, such as a national inter-agency enforcement committee bringing together agencies responsible for combating wildlife trafficking (e.g., wildlife agencies, customs, police) and/or MoU between relevant law enforcement agencies, were brought to the attention of the team.

3.1.5 INTERNATIONAL COOPERATION

Between July and September 2015, Ghana participated in INTERPOL Operation LOG, a workshop focused on rosewood and led by the INTERPOL NCB and the Regional Bureau. Ghana is an ivory and pangolin exit point within West Africa. The World Customs Organization (WCO) lists Ghana as part of Project INAMA, a WCO program scheduled to run until 2019 to support counter wildlife trafficking enforcement efforts in sub-Saharan Africa. It is unknown if there are any bilateral MoUs between Ghana and other countries that focus on combating wildlife trafficking.

3.1.6 STRATEGIC RISK MANAGEMENT

Ideally, risk management practices should be coordinated to direct and control risks and used to identify high-risk activities, locations and individuals, and target operational enforcement planning to combat wildlife trafficking. Risk management helps determine where the greatest areas of exposure are, and effectively manage these risks. Among other things, risk management helps to identify activities that require a higher level of control.

In Ghana, strategic risk management practices to combat wildlife trafficking are not used to target operational enforcement planning. Implementation of these measures is usually constrained by inadequate human, financial and technical resources and capacity.

3.1.7 PROACTIVE INVESTIGATIONS

Proactive investigations to target prominent wildlife trafficking threats and pre-identified targets, individuals and groups rarely occur. Inadequate resources (e.g., human, financial, technical) and capacity (e.g., training on transnational organized crime in the context of wildlife trafficking, criminal intelligence analysis on wildlife trafficking) often constrain proactive efforts.

3.1.8 STAFFING, RECRUITMENT AND LAW ENFORCEMENT TRAINING

National law enforcement agencies that combat wildlife trafficking are understaffed. These agencies lack an appropriate mix of full-time, part-time and casual employees, as well as professional, technical, investigative and administrative staff needed to accomplish the required activities. They also sometimes experience recruitment delays and/or difficulties. At the INTERPOL NCB Accra, the Deputy Commander of the NCB was enthusiastic about combating wildlife trafficking but had no specific staff member responsible for it or with experience in this field.

The police in Ghana have had no training in wildlife trafficking. Institutional training programs for national law enforcement agencies lack basic content, such as species identification materials and legal
requirements for trade in wildlife. The Wildlife Division provides annual training on wildlife conservation and law enforcement at the Police Academy in Accra. However, training the needs assessment for this program needs to be updated.

3.2 DETECTION OF WILDLIFE TRAFFICKING BY LAW ENFORCEMENT AGENCIES

3.2.1 TARGETED ENFORCEMENT PRESENCE

In Ghana, places most affected by or used for wildlife trafficking have not been identified using intelligence and enforcement information or generated using risk management practices or proactive investigations. It is, however, known where the protected areas are and where there is proximity to border lines and border points. Regional frontiers are porous and exploitable by wildlife traffickers.

3.2.2 JOINT / SUPPORTIVE OPERATIONS

A multi-disciplinary law enforcement operation is one that involves officers from all relevant enforcement disciplines — for example, officers from police, customs, and the wildlife regulatory authority. Operations can either be subnational, national or international in scope. Multi-disciplinary enforcement operations targeting wildlife trafficking in Ghana are conducted on an infrequent (once every two years) and ad-hoc basis at the national level. They are sometimes conducted at an international level. Ghana is a member of the Economic Community for West African States (ECOWAS), which suggests that the possibility exists of more frequent international operations to address wildlife trafficking.

3.2.3 BORDER CONTROL STAFF

Entry and exit ports are rarely staffed by vetted law enforcement officers that are aware of and trained in detecting and responding to wildlife trafficking, besides veterinary service officers. Such training may include national and international components, such as CITES legal requirements for trading protected species, identification of CITES-listed species, CITES permit and certificate requirements and training in investigative techniques like domestic and international controlled deliveries.

3.2.4 BORDER CONTROL EQUIPMENT

There is limited equipment for border control to respond to wildlife trafficking in Togo. There are x-ray scanners but no tools for the detection of wildlife trafficking. Other tools border control lacked included: detector dogs imprinted for wildlife contraband, identification manuals and/or microchip scanners, flashlights, gloves, protective clothing, night vision equipment, field binoculars, handheld thermal imagers, endoscopes, multi-tools (e.g., Leatherman or similar), handheld microchip scanners, smartphones with relevant apps, cameras and lenses, body cameras (e.g., GoPro or similar) with rechargeable batteries and attachments, drones (e.g., Mavic or similar), laptop computers with appropriate software (e.g., IBM i2 Analyst Notebook), tracking devices, or electronic tablets combined with training in equipment use.

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3.2.5 INSPECTION AND SEIZURE POWERS

Most relevant agencies in Ghana have the powers of inspection, seizure and confiscation to fulfill their law enforcement roles effectively, but need broadening.

3.2.6 DISPOSAL OF CONFISCATED WILDLIFE SPECIMENS

In Ghana, systems and procedures for managing and disposing off confiscated wildlife specimens including storage facilities with improved security and facilities for humane storage and disposal of live specimens have not been developed.5 Existing systems and procedures for managing and disposing off confiscated wildlife specimens do not meet CITES standards.

3.3 WILDLIFE TRAFFICKING INVESTIGATED USING AN INTELLIGENCE-LED APPROACH

3.3.1 INVESTIGATIVE CAPACITY

INTERPOL and the Wildlife Division of the Forestry Commission told the team that customs have inadequate capacity to investigate. The Forestry Commission has its own prosecutors and has had many cases, but nearly all are to do with poaching and not for CITES. There is a bill currently before Parliament that will give more powers to enforcement agencies to prosecute CITES cases when passed.

The number of national law enforcement staff investigating wildlife trafficking is insufficient. In addition, these staff do not have the required training, such as crime scene investigation, information and evidence gathering, identification of suspects and interviewing techniques. There has not been recent on-the-job training or mentoring from people experienced in combating wildlife trafficking.

3.3.2 INFORMATION MANAGEMENT

National procedures and systems for capturing and consolidating wildlife trafficking information — poaching incidents, seizures, criminal activities, criminal associations, social networks, smuggling routes, smuggling methods, prosecutions and convictions — in a secure national database needs to be developed. Moreover, analysis of this information rarely takes place. Potential reasons include a lack of consolidated information, insufficient access to relevant databases, and/or a lack of trained staff to analyze data. There is no capacity for the analysis of such information using computer programs such as IBM iBase or i2 Analyst’s Notebook.

3.3.3 INTELLIGENCE-LED INVESTIGATIONS

Crime intelligence is information that is gathered, compiled and analyzed to anticipate, prevent and/or monitor criminal activity. Crime intelligence is disseminated to direct and support effective law enforcement action, investigations and prosecution. In Ghana, crime intelligence on wildlife trafficking is

not generated. Potential reasons include a lack of: information-gathering capacity, consolidated information, staff trained in data analysis and access to relevant databases.

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In Ghana, there is no crime intelligence on wildlife trafficking.

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3.3.4 FOLLOW-UP INVESTIGATIONS

Follow-up investigations into wildlife trafficking cases in Ghana are rarely conducted at the national and international level. Such investigations could include following up on information and evidence found on seized computers, mobile phones, documents, DNA and fingerprints. It could also include engaging with authorities in countries of origin, transit and destination to share information when appropriate.

3.4 SPECIALIZED INVESTIGATIVE TECHNIQUES USED TO COMBAT WILDLIFE TRAFFICKING

3.4.1 USE OF SPECIALIZED INVESTIGATIVE TECHNIQUES

Specialized investigation techniques are those that are deployed against serious and/or organized crime when conventional law enforcement techniques fail to adequately address the situation. For instance, it can include controlled deliveries, use of tracking devices, or covert operations. None of these techniques have been used by national law enforcement agencies to combat wildlife trafficking in Ghana.

3.4.2 FORENSIC TECHNOLOGY

National law enforcement agencies have the forensic capacity to support the investigation of wildlife trafficking. This means having the ability to collect samples from wildlife trafficking scenes (e.g., ballistics, fingerprints, DNA, tool markings on ivory) and submit them to an appropriate forensic analysis facility located either in the country or in another country. In Ghana, national law enforcement agencies may have limited staff, few of whom have received basic training in sample collection and processing to support the investigation by INTERPOL of wildlife trafficking. These agencies may be able to access forensic support from other institutions or countries to support the investigation of wildlife trafficking.

3.4.3 FINANCIAL INVESTIGATIONS

National enforcement agencies have received no formal training and have limited knowledge of and capacity to conduct financial investigations in the prosecution of wildlife trafficking cases. A financial investigation is any investigation into a person, a group’s, a business’ or a private limited company’s financial matters. A financial investigation can determine where money comes from, how it is moved, and how it is used. Financial investigations may lead to asset forfeiture and possibly charges for tax evasion and customs duties evasion.
3.4.4 USE OF CRIMINAL LAW

Relevant criminal law is rarely applied to wildlife trafficking offenses in Ghana. Because of the high value of some illegally-traded wildlife specimens and the involvement of organized crime groups in wildlife trafficking, mandated maximum fines enacted to combat wildlife trafficking often bear little relation to the value of wildlife trafficking specimens or the severity of the offence. It is therefore important that persons arrested for involvement in wildlife trafficking are charged and tried under a combination of relevant laws that carry the highest penalties whenever possible and appropriate. These laws could include legislative provisions for international cooperation, combating corruption, and addressing organized crime as well as general crime laws that relate to offences such as fraud, corruption, conspiracy, possession of weapons and other matters as set out in the national criminal code.

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*It is important that persons arrested for wildlife trafficking are charged and tried*

3.4.5 CASE FILE PREPARATION

National enforcement agencies responsible for the investigation of wildlife trafficking in Ghana have received no formal institutional training on case file preparation, judicial procedures and submitting evidence in court unless this was part of individual staff members’ tertiary education.
4.0 CONCLUSIONS AND RECOMMENDATIONS

4.1 TRAFFICKING ROUTES

Very little information on seizure statistics was provided to the team during the field assessment on seizure statistics from Ghana which might shed some light on trafficking routes. There is little historical information on the Internet that implicates Ghana’s involvement in the trafficking of wildlife. However, in June 2017, Malaysian customs seized two separate 700 kg shipments of pangolin scales that originated in Ghana. Suspects arrested by the Criminal Investigation Department of Ghana Police Service during the investigation revealed that the specimens originated from Nigeria. Both shipments were labeled as oyster shells on the boxes and were probably destined for China or Vietnam. It is doubtful whether security or customs had the skills to identify pangolin scales, which could explain why they were not seized in Ghana.6 Also in 2017, 60 Grey parrots and 98 Senegal parrots were seized by officers at Kotoka International Airport.

The listing of *Pterocarpus erinaceus* on CITES Appendix II came into force on January 2nd, 2017 and is expected to impact the trade and regional smuggling routes in West Africa.

4.2 CHALLENGES RAISED BY PARTICIPANTS

Based on the information collected, the following challenges were identified:

1. **CITES training:**

Inadequate CITES knowledge was the main challenge raised by all customs officers interviewed and the inability to identify CITES-listed wildlife products was the second. While Ghana customs were the most well-equipped and professional of the countries assessed by the team, it had received less training on CITES than any of the others. Participants also mentioned that there is a lack of reference materials to help provide information on the identification of CITES-listed species and on legislation.

Few of the Wildlife Division of Forestry Commission staff, particularly on the front line, have had CITES training. Apart from officials stationed at the airport, only one other border post has coverage by Forestry, so forestry staff would be of limited help if enforcement officers came across potential CITES specimens. Customs staff is moved to different Collections after about 4-7 years, so expertise could be lost from key areas and within Collections they can be moved at any time.

2. **Inadequate awareness**

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Inadequate information/intelligence was raised as an issue that negatively impacted the capacity of customs officers and police to look for and receive valuable information.

3. Inadequate coordination

The need for a network of officers at entry points was also raised to help the flow of information, support frontline officers and act as a liaison point with other agencies. More inter-agency coordination will be required in order to share information and pool expertise and experiences. There is also a lack of harmonization in the regional standards.

4. Other challenges

The lack of ability to examine live animal shipments reported by the Veterinary staff working at the airport is a real issue. Currently their team relies on the importing countries to do the checks, but a better solution would be to prevent trafficking of reptiles at the country of origin, so that the reintroduction of specimens into the wild is a possibility.

4.3 PRIMARY RECOMMENDATIONS

The team and participants made the following primary recommendations to tackle the identified challenges:

1. CITES training

- Provide CITES enforcement training to all frontline officers, including those responsible for dealing with permits. Other agencies should be included in this training to foster joint working practices, especially Forestry officers who will be assisting with enforcement.

- Ensure that CITES is included in the curriculum of relevant national and regional training schools (customs, police, Forestry Commission, veterinary and other relevant agencies) at the national and regional level as appropriate, especially in the program for new entrants.

- Identify prospective customs trainers to design and implement a train the trainer program to ensure that training needs can be sustainably addressed. The team has already identified Sambien Bandjie, Principal Revenue Officer in the Tema seaport of Accra, as a potential trainer.

- Design and implement necessary training in risk profiling to ensure that profilers are trained and can be part of wildlife law enforcement networks in order to assist with setting risk profiles for CITES.

- Design and provide reference materials for enforcement to use on the frontline. These materials could include identification, legislation, national/regional contacts, and procedures.

- Consider specialist training for investigators who will be involved in combatting wildlife trafficking and those involved in anti-poaching.

- Develop a network of higher trained customs officers to cover entry points between Ghana and Burkina Faso, and Togo and Cote d'Ivoire as a link with frontline officers. To address the problem of staff movement, at least three officers from each location should be trained to the
desirable standard. As a starting point Sambien BANDJIE is very keen to be part of this network and to contribute to training as necessary.

2. Improve coordination
   ▪ Establish a national strategy for tackling wildlife crime, including poaching as well as trafficking, which should link into a strategy developed regionally.
   ▪ Create a multi-agency approach with a clear structure, roles, and responsibilities.
   ▪ Identify national and regional priorities and develop an action plan.
   ▪ Organize regular meetings between member agencies to drive forward the action plan, identify and resolve issues and review progress against the action plan.
   ▪ Identify a central point with the capacity and expertise to collate, analyze and disseminate information/intelligence. This is probably best based in the police, but another agency might take on the responsibility. Training and equipment may need to be provided.
   ▪ Ensure the capacity to exchange information regionally and internationally when needed.

3. Raise awareness
   ▪ Organize workshops to make senior officials more aware of CITES and of the important role relevant stakeholders have in stopping wildlife trafficking.
   ▪ Develop and distribute posters to raise CITES awareness among law enforcement and the public.

4. Inspection and handling of live specimens
The inability to examine live animals at export/import at the airport needs to be addressed as a matter of urgency. Recommendations on inspection and handling of live specimens include:
   ▪ Establish a location where live specimens can be examined safely and providing necessary equipment to ensure safe handling.
   ▪ Provide specialist training on the safe examination and identification of specimens.
   ▪ Provide training on the implementation of CITES rules governing the transport of live specimens.
   ▪ Define national protocols for the disposal of confiscated specimens.
   ▪ Deploy Wildlife Division staff to all points of entry.
ANNEX 1: SCHEDULE OF THE ASSESSMENT

Monday, 22 May 2016

- Meeting with the Executive Director, Forestry Commission (Wildlife Division), the Assistant Commissioner of Police, Divisional Police Commander, the Forestry Commission, Accra Airport and the Chief of Customs Revenue Investigations at the Cargo Division of the Airport of Accra.

Tuesday, 23 May 2016

- Interviews at the airport of Accra and visit to the site. Interviews were conducted with the team of the exports cargo, the examination team, the cargo compliance team and the imports team. Interviews were also conducted with the staff of the airport working at the terminal.

Wednesday, 24 May 2016

- Meetings were organized with the Assistant Commissioner, Sector Commander, at the Tema Port and the Principal Revenue Officer, Operations, Tema Port
- Visit to the bushmeat and the craft markets
- Meetings organized with WA-BiCC

Thursday, 25 May 2016

- Chief Revenue Officer, Aflao Border Crossing (Ghana/Togo)

Friday, 26 May 2016

- Meeting with the Forestry Commission, Wildlife Division.
ANNEX 2: CONTACT LIST OF RESPONDENTS INTERVIEWED DURING THE FIELD MISSION

<table>
<thead>
<tr>
<th>TITLE</th>
<th>NAME</th>
<th>EMAIL AND PHONE NUMBER</th>
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<td>Chief Revenue Officer, Aflao border-crossing border</td>
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REFERENCES


UNDERSTANDING THREATS TO WEST AFRICAN BIODIVERSITY AND LINKAGE TO WILDLIFE TRAFFICKING

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