

INL Project: Combatting the Facilitators of the Illegal Wildlife Trade in Cameroon

Terms of Reference for a Financial Investigation Expert (Consultant) to design and deliver training to combat the illegal wildlife trade (IWT) in Cameroon

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Deadline for application: __June 28th, 2024, 2pm UK time__

Background

Environmental crimes, including wildlife and timber trafficking, are amongst the largest and most profitable transnational criminal activities. Considered as a transit zone between West and Central Africa, Cameroon covers a complex mosaic of habitats, rich in species diversity, with over 409 species of mammal, 373 species of reptile and amphibian, and 849 species of birds. The forested areas along the border with Nigeria are the wettest part of Africa, supporting the continent's second highest concentration of biodiversity, including many endemic species. Despite global commitments to combatting the illicit trade in wildlife and forestry products by the Forestry and wildlife officials of Cameroon, other Law Enforcement Agencies and Authorities (LEAs) as well as private sector and civil society stakeholders, this rich biodiversity continues to be threatened by poaching and illegal wildlife trade (IWT). For some species, such as the Western black rhino, this has led to extinction. Medium and large mammal populations within the country are not the only species facing significant threat: estimates suggest that 65% of timber production in Cameroon is illegally logged. As Cameroon has the second-largest forest area in the Congo Basin, this has existential implications for a biodiversity area of global importance.

Beyond its role as a source country, Cameroon is also a transit country for wildlife and forestry products sourced illegally in other Central African countries (especially the Central African Republic (CAR), Republic of Congo, Federal Republic of Nigeria, Equatorial Guinea, and Gabon). These illicit supply chains are destined for global demand markets, moving via land, sea, and air routes. Recent examples include the arrest of a Cameroonian national in Nigeria in February 2024, in connection with 200kg of ivory concealed in a hidden compartment in his car with false plates. The suspect is reportedly part of a major ivory trafficking network sourcing product from Gabon and Cameroon and transporting to Nigeria and was convicted of a similar offence in 2021 in Cameroon featuring 626kg of ivory. This case illustrates a critical need to support Cameroonian LEAs to build capacity to disrupt transboundary IWT flows and strengthen cooperation with their counterparts in Nigeria and elsewhere across the region. An opportunity to do so is provided by a new Memorandum of Understanding on joint action to counter IWT, recently signed by the governments of Cameroon and Nigeria.

Traffickers consider IWT as low-risk – high-value, given the huge profits generated from the sale of fauna and timber products in destination markets. This highly lucrative illicit activity is managed by organised criminal groups (OCGs) and other threat actors through a multiplicity of financial

transactions, involving money laundering and other financial crimes. Recent evidence suggests that conflict timber from CAR is being moved at industrial scale through Cameroonian shell company structures controlled by Wagner, the mercenary arm of the sanctioned Russian state. Officials and experts also observe that wildlife and timber trafficking is facilitated by extensive corruption, including bribery, patronage, and nepotism, on both a petty and grand scale.

Despite the extent of financial crime risk in the sector, there is a conspicuous scarcity of financial investigations related to wildlife and forestry offences. Information about the ways in which criminals extract profits from wildlife and forest crimes, and the identities of the main financial beneficiaries of these crimes, remains limited, suspicious transactions for these predicate offences are rarely reported by the private sector, and investigations are not actively carried out. The result of this is that low-level criminals, such as poachers, are routinely caught and prosecuted, leaving more senior OCG members and actual criminal beneficiaries free to perpetrate illicit activities with impunity. In their 2020 report on “Money Laundering and the Illegal Wildlife Trade” the Financial Action Task Force (FATF) emphasised the need to conduct financial investigations into IWT to enable the identification and prosecution of senior IWT offenders, as well as outlining the role of regulated entities in the private sector (banks, mobile money services, etc.) in detecting and reporting suspicious behaviour and/or transactions linked to IWT. More recently, the third edition of the United Nations 2024 World Wildlife Crime report, recognised the importance of enforcement strategies which target large-scale offenders more incisively, avoiding the potential social harms of disproportionate targeting of subsistence offenders and successfully deterring large-scale offending, and the value of financial investigations in doing so.

Training Interventions

Consequently, TRAFFIC is recruiting a consultant to:

1. Develop a set of training modules that will aim to provide knowledge to LEAs to enhance the disruption of IWT and OCGs trafficking in fauna and flora;
2. Deliver training on IWT-related illicit financial flows and financial investigation skills to selected groups of stakeholders, comprising public sector, private sector and cross-sector audiences over a series of workshops and activities.

The training will aim to stimulate the process of conducting financial investigations on IWT cases.

Target Audiences:

- ANIF
- MINFOF
- Other relevant law enforcement agencies (e.g., National Gendarmerie, Cameroonian Customs etc)
- Ministry of Justice (MINJUSTICE) - Judges and Magistrates.

- Lawyers of the Cameroon Bar Association
- Financial institutions

Outputs:

- Set of modules including, but not limited to, the proposed topics:
 - Understanding the IWT transboundary supply chain
 - Raising awareness of IWT-related illicit financial flows
 - Understanding the different roles and responsibilities involved in gathering financial intelligence and conducting a financial investigation
 - Improving capacity to identify financial evidence and red flags for money laundering risks in cases;
 - Strengthening inter-agency cooperation in conducting financial investigation and intelligence gathering
 - Role of the private sector in combatting IWT through financial compliance systems
 - Key IWT-related red flags and typologies for Cameroon financial sector
 - How to enhance public-public and public-private sector coordination and joint working during the financial investigative process.
 - Principles of asset recovery, how to identify and seize criminal assets
- Delivery of the modules through 3 x in-person training sessions in Cameroon, including 1 x one-week workshop in Sep 2024, and 2 x two-day workshops in Cameroon in the first quarter of 2025.

Timeframe:

Jul 15th, 2024 – 31th Apr 2025.

N.B. The consultant will need to be available immediately to deliver activities (a) and (b) (see below) during Jul-Sep 2024 and be prepared to travel to Cameroon to deliver the Sep 2024 workshop (c) - which is most likely to fall w/c 23 Sep 2024 - and the Mar 2025 workshops (d).

Consultancy profile

TRAFFIC Central Africa is looking for a technical consultant to provide the following services:

- a) Development of Financial Investigation (FI) training modules for public sector baseline FI training on IWT predicate offences (July-August 2024)
- b) Technical advice to the multi-stakeholder planning process for the FI workshop and module development (Aug-Sep 2024)
- c) Lead technical trainer delivering 1 x one-week in-country, multi-agency FI workshop in Cameroon (by end Sep 2024)
- d) Leading the delivery of 2 x two-day in-country workshops for (i) private sector (regulated financial entities) stakeholders and (ii) jointly for public and private sector participants to strengthen the financial sector response to wildlife trafficking. The workshops will be held in Cameroon in 1Q 2025, in a back-to-back fashion.

- e) Written technical reports following each in-country engagement, summarising activity and insights into ongoing capacity building gaps and priorities, preferably in English.

Activities under (a) and (b) will be led by RUSI, with support on stakeholder engagement and in-country travel and logistics by TRAFFIC. Activities under (c) will be led by TRAFFIC, with speaker inputs/attendance by RUSI. Adjunct training inputs may be provided by local, cross-sector actors, as well as members of TRAFFIC's Central Africa and Global staff, and the Royal United Services Institute's (RUSI) Organised Crime and Policing team.

Under the direct supervision of TRAFFIC staff and working closely with its partner organisation RUSI, the consultant will be expected to have:

1. Comprehensive experience designing training modules on the use of financial investigation, prosecution and intelligence to combat money laundering, and related predicate offences, preferably in the context of wildlife and/or forestry crimes.
2. Proven expertise in providing technical training to, and leading workshops for, national public sector actors, such as LEAs, financial intelligence units (FIUs) and justice actors on the use of financial investigation, preferably in wildlife and/or forestry crime.
3. Good coordination, interpersonal and communication skills, with experience of collaborating with public sector actors in the development and delivery of capacity-building products or activities.
4. Experience working with law enforcement agencies, prosecution, or financial compliance sectors.
5. At least 5 years of international work experience in training participants on financial investigation, for law enforcement/government institutions, preferably with experience of working with IWT source and transit jurisdictions in West, Central, East or Southern Africa.
6. Availability and willingness to travel to Cameroon to deliver in-person training in line within the Timeframe section.
7. Fluency in English and/or French and have experience of working with simultaneous translation.

Application

To apply, please send your written application to the TRAFFIC INL Project Manager Itoe Constantine, copying Fosab Ewah via the email addresses below. The application should be submitted as a single PDF file consisting of the following sections:

- Cover letter summarizing relevant knowledge, skills, experience, and motivation for applying, approach to the work, and budget.
- CV
- One page sample proposal for module development and training delivery
- Contact details of three professional references.

The best applicants will be expected to be interviewed in early July through online applications.



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Deadline

June 28, 2024, 2pm UK time

For further information, contact

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Working to ensure that trade in wild species is legal and sustainable, for the benefit of the planet and people

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