



# FINANCIAL FLOWS AND KEY INDICATORS ASSOCIATED WITH ILLEGAL WILDLIFE TRADE IN SOUTH AFRICA – THE 2025 UPDATED PERSPECTIVE

OCTOBER 2025

IWT TASK FORCE

**SAMLIT**  
South African Anti-Money Laundering  
Integrated Task Force

## SAMLIT MEMBERS

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### Public sector

Financial Intelligence Centre

South African Reserve Bank: Financial Surveillance department and Prudential Authority.

### Industry bodies

South African Banking Risk Information Centre

The Banking Association South Africa

### Banks operating in South Africa

Absa Group Limited

African Bank Limited

Albaraka Bank

Bank of China

Bank of Taiwan South Africa Branch

Bidvest Bank Limited

Capitec Bank Limited

China Construction Bank Corporation, JHB Branch

Citibank N.A., South Africa

Deutsche Bank AG, JHB Branch

Discovery Limited

Finbond Mutual Bank

FirstRand Group

GBS Mutual Bank

Grindrod Bank Limited

Grobank Limited

HBZ Bank Limited

Habib Overseas Bank Limited

HSBC Bank

Investec Bank Limited

JP Morgan Chase

Nedbank Group Limited

Sasfin Bank Limited

Standard Chartered Bank

State Bank of India, South Africa

Standard Bank Group

TymeBank Limited

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Absa Group Limited

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Citibank, N.A., South Africa

Department of Forestry, Fisheries and the Environment

Directorate for Priority Crime Investigation

Financial Intelligence Centre

FirstRand Group

Investec Bank Limited

Luno

National Prosecuting Authority

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South African Revenue Service

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Standard Chartered Bank

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## DISCLAIMER

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The information in this publication is for information purposes and for raising awareness on financial flows and indicators associated with illegal wildlife trade and has not been independently verified.

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# INTRODUCTION AND BACKGROUND

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## **Introduction**

South Africa continues to face significant threats from illicit wildlife trade (IWT). This is recognised as not only as an environmental concern but also as one of organised transnational crime. The SAMLIT IWT Task Force (IWT Task Force), has made significant progress in tracking the financial flows linked to this evolving and deeply embedded crime.

In developing this update, the IWT Task Force has been supported by the SAMLIT IWT tactical operations group (TOG), South African Police Service (SAPS) and the SAPS' Directorate for Priority Crime Investigation (DPCI), South African Revenue Service (SARS), Department of Forestry, Fisheries and the Environment (DFFE), the National Prosecuting Authority (NPA), Asset Forfeiture Unit (AFU), and others. Altogether, this collaboration has significantly impacted on the use of financial intelligence and quality of investigations conducted by the investigation authorities.

The collaborative efforts of the FIC and SAMLIT in fighting IWT have gained international recognition, highlighting how cross-sector co-operation can effectively disrupt wildlife crime and safeguard South Africa's biodiversity. Targeted training initiatives, informative webinars, dedicated IWT reporting mechanisms, and strong partnerships, particularly with United for Wildlife (UfW), have all contributed to the IWT's Task Force's effectiveness.

In response to the wider economic, social, and security risks posed by IWT, South Africa has implemented a National Integrated Strategy to Combat Wildlife Trafficking (NISCWT), a comprehensive, multi-agency approach to address the issue. In support of this strategy, the IWT Task Force emphasises disrupting the value chain through the increase in financial investigations and removing the proceeds of crime through the activities of the Task Force and the TOG.

## **Updates on IWT reports**

Phase 1 of the EWG focused on understanding the financial flows within IWT supply chains and promoting collaboration between financial institutions and law enforcement. The objectives included enhancing knowledge, identifying red flags on the associated crimes, improving co-ordination, and increasing successful prosecutions related to IWT-linked money laundering.

The Phase 1 report confirmed the EWG's value in profiling IWT-linked financial behaviour and noted improved quality and volume of suspicious and unusual transaction reporting by the banking sector. By integrating insights from real case investigations led by TOGs, the EWG helped refine understanding of criminal typologies and financial patterns.

Following the success of Phase 1, the Phase 2 report on financial flows associated with IWT began in April 2022 and was published in December 2023.

The objectives of Phase 2 objectives included continuing collaboration, expanding partnerships, enhancing information-sharing, and increasing public engagement. Key outputs for Phase 2 included updated typologies since the Phase 2 report was published and indicators based on new cases, deeper involvement of relevant agencies, improved stakeholder coordination through the DFFE Fusion Centre, and greater focus on regional and international cooperation aligned with FATF

standards. Additional efforts included hosting webinars, training sessions, and conducting case reviews to extract actionable insights.

Upon publication of the IWT EWG's second report, the work of the EWG was completed and the EWG consequently disbanded as a result, and the work continuing under SAMLIT IWT Taskforce with an open-ended mandate.

## RESEARCH AND FINDINGS

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### **Background**

Over the past four years, insights gained by the EWG and the IWT Task Force from investigations by law enforcement have significantly enhanced our understanding of trafficking networks and organised crime linked to the wildlife trade, particularly regarding associated financial flows.

There is also a deeper understanding of the scale and complexity of IWT in South Africa, and recognition of the overlap between illicit and legal trade activities. Since the previous reports, SAMLIT members have actively participated in investigations concerning several product streams stemming from IWT. Numerous reports have been produced on these commodities across South and Southern Africa, some of which are cited in this document, and the findings have been further enriched by our own experiences and those from TOG investigations.

Specifically cited in this report is the outcome of the FIC's in-depth analysis of regulatory reports i.e. suspicious and unusual transaction reports (STRs) and suspicious activity reports (SARs), received over the period 1 January 2022 to 1 December 2024 (referred to as Phase 3 STR data mining). The FIC received 439 STRs relating to IWT over this period, a significant increase from the 139 regulatory reports received between 1 September 2020 and 31 July 2022, which was the focus period during the Phase 2 STR data mining. Although the number of reports received has increased, the quality of reporting still requires improvement. For example, information about transactional location and other information such as gender and occupation of the subjects should be included in the regulatory reports provided by the banking sector.

### **Occupational backgrounds of perpetrators**

The Phase 3 data mining report identified several new nationalities not identified previously, namely Nigerian, Korean, Pakistani, Swati, and Lebanese nationals. The majority of IWT perpetrators, however, remained South Africans (90.2 percent).

Perpetrators were shown to be involved in a wide range of occupations including being self-employed, students, drivers, labourers, homemakers, and low-income individuals. Farmers were particularly prominent, with other professionals including attorneys, executives, and construction directors. Many perpetrators reported having income from salaries, businesses, grants, gambling winnings, or informal means. Businesses involved ranged from Chinese restaurants and general wholesalers to logistics and air freight companies.

This report also notes the involvement of organised criminal groups that use legitimate businesses, such as boating equipment dealers, as fronts for wildlife trafficking. Employees at farms and

restaurants, were frequently implicated, particularly in connection with abalone and rhino poaching. Some individuals were associated with non-profit organisations or government agencies indicating corruption among officials. Game farms, reserves, and safari pilots were also connected, along with national park employees who allegedly accepted bribes. Border officials, truck and bus drivers were reported to have facilitated smuggling operations.

Wildlife crimes committed included abalone and rhino poaching, smuggling of exotic species, trafficking in endangered plants and animals, illegal hunting, possession of firearms, racketeering, corruption, money laundering and attempted murder, among others. A few politically exposed persons, such as a foreign embassy official, were reported in the regulatory reports.

### **Financial behaviour and transactional indicators**

In terms of financial activity, perpetrators showed suspicious transactional behaviour, including rapid fund withdrawals, lack of income indicators, and structured cash deposits and business accounts without any business-related expenditure. There was frequent abuse of minor accounts and use of shelf or courier companies for illegal transport. Some individuals used crypto arbitrage and had links to past poachers. Account activity often involved small but high-volume transactions and overseas cash withdrawals following local deposits.

Incoming funds were mostly received via cash deposits, sometimes at airports, as well as through electronic payments, social grants, and gambling platforms. Funds were typically disposed of through ATM withdrawals, point-of-sale purchases, online gambling, and international transfers. High-value purchases and use of remittance services were also observed. Some transactions included vague or coded deposit references like "Secret," "MOOLA," "Villa Payments," and terms linked to rhino hunting or abalone.

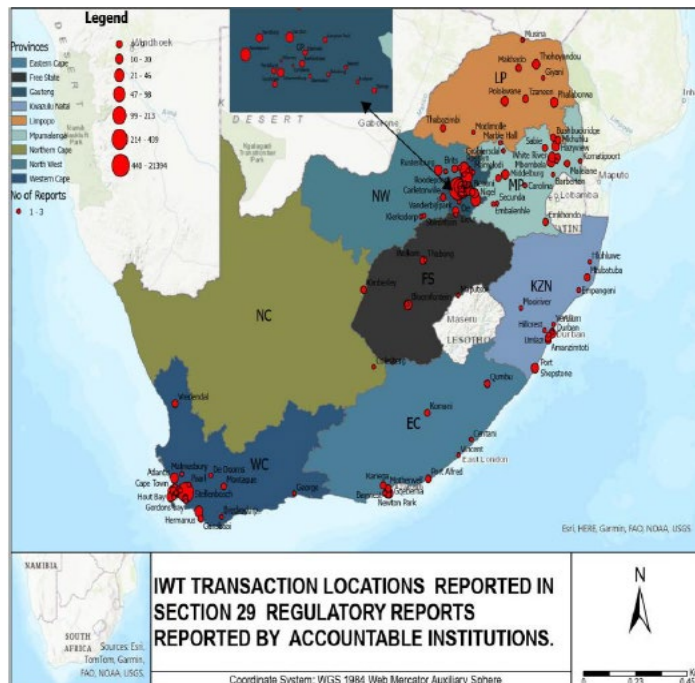
Cash and electronic fund transfers were the main transaction methods used. The most common account types were current, transmission, cheque, and business accounts.

Cross-border transactions showed significant flows into South Africa from the U.S.A, Austria, Slovenia, Spain, and China, and outflows to Georgia, India, and Albania.

### **Geographic hotspots in South Africa**

Based on the mining of data from financial intelligence reports, many transactions were shown to have occurred in Gauteng (especially Johannesburg and Pretoria), the Western Cape (especially Cape Town and Hout Bay), and Mpumalanga (especially Nelspruit and Sabie). High-value transactions were often recorded in Sandton, Stellenbosch, and Bedfordview. Most of the transaction locations were reported as either 'not obtained' or 'electronic', which is currently identified as an area of improvement for reporting by the banking sector. In addition, in several instances the transaction location was reported as the head office of the financial institution, which would be considered inaccurate. This is one of the areas for improvement, that has been identified in the STR analysis.

Consequently, the reported locations of the regulatory reports as illustrated in the below image may not align with the known hot spots for IWT.



## Successful cases

The criminal cases listed below demonstrate the continued and ongoing focus by law enforcement authorities in investigating IWT-related crime. It also demonstrates the use of financial intelligence and evidence in the investigations resulting in the prosecution of money laundering associated with IWT-related crimes.

- *S v Kimpampa*, was a co-accused in a case investigated by the DPCI during the period 2022 to 2023. He was convicted on charges relating to third-party money laundering and conspiracy to hunt rhinos. He facilitated the sale of rhino horns to Chinese nationals on behalf of accused one, a general labourer who worked in government. He was sentenced to 18 years imprisonment, of which five years were suspended. His effective sentence is 12 years imprisonment. He facilitated the laundering of R12 million. He retained a fee of R5 million, which he used to build a property portfolio.
- *S v T Kwababa and three others* were sentenced to 20 years imprisonment on counts of money laundering and possession of an unlicensed firearm. Their effective sentence was 10 years imprisonment. They killed and dehorned six rhinos at a game farm during 2022 and intended to sell the horns.
- *S v QQ Feng* was sentenced to two years on the predicate offences and six years on the money laundering charge. He will effectively serve six years' direct imprisonment. He was convicted on charges of possession, transporting and storing abalone without a permit and money laundering. On 27 January 2024 he drove in a vehicle escorting a truck, with a false compartment containing abalone. The truck was *en route* from the Eastern Cape to the border post between South Africa and Botswana. Abalone, 56 boxes amounting to 1 257 kg, to the value of R6.9 million was found hidden in a compartment underneath the truck.
- *S v H Rossouw* was indicted on the *S v Groenewald* matter in the High Court. He worked as a professional hunter on the farm and pleaded guilty on the 14 charges. The charges included: Participation in the affairs of an enterprise (racketeering); selling of a rhino cow, dehorning a rhino

bull, buying and selling two horns for R68 000, incitement to commit a crime and money laundering linked to the selling of the two horns. He was sentenced on the racketeering charges to three years' correctional supervision with a further 10 years imprisonment suspended. On counts 2 to 13 (the predicate crimes and the money laundering), he was fined R100 000 or three years imprisonment, and with a further five years imprisonment suspended.

## **National, regional and international engagement**

Due to the high level of collaboration and number of stakeholders in SAMLIT and IWT investigations, the IWT Task Force highlighted communication as a key focus area. Communication occurs through online platforms and in-person sessions, including regular meetings, awareness presentations, and training at all levels, including provincial, national, regional, and international. The examples below reflect only formal activities and exclude informal and one-on-one interactions that also help build networks.

- **Basel Institute of Governance: 2024**  
Members of the IWT Task Force shared insights on collaborative structures, key challenges, and opportunities to enhance stakeholder co-operation for improved compliance. They underscored the critical role of public-private collaboration in understanding financial flows and criminal typologies linked to IWT. Discussions highlighted the complexity of the illicit supply chain, the role of corruption, and the need to analyse communication tools and channels at an operational level. Case studies showcased how co-ordinated efforts and financial intelligence have contributed to successful prosecutions, reflecting a growing shift toward integrated approaches in combating IWT.
- **United for Wildlife East Africa Meeting: 2024**  
SAMLIT shared a successful case study with the East Africa Chapter meeting in Nanyuki, Kenya, highlighting the value of collaboration in tackling IWT. East Africa is a major source region for IWT, and the East Africa Chapter works closely with financial intelligence units and key transport players to disrupt trafficking routes and strengthen port partnerships.
- **United for Wildlife Taskforce Showcase, supported by LexisNexis® Risk Solutions: 2024**  
At the United for Wildlife Taskforce Showcase, supported by LexisNexis® Risk Solutions, SAMLIT highlighted the power of financial intelligence and public-private collaboration in combating IWT. Presenting case studies and operational successes, SAMLIT demonstrated how integrated approaches involving law enforcement, financial institutions, and international partners are disrupting criminal networks. The presentation also emphasised the importance of innovation, cross-sector engagement, and regional collaboration, such as UfW, to strengthen efforts and drive impactful outcomes in the fight against IWT.
- **FINTRAC United Nations World Wildlife Day: 2025**  
At the 2025 United Nations World Wildlife Day event, SAMLIT participated in a panel discussion hosted by FINTRAC, focusing on advancing efforts to combat IWT through financial disruption. The panel explored challenges, successes, and best practices in public-private partnerships, with SAMLIT sharing its forward-looking approach to tackling IWT-related money laundering. Emphasis was placed on expanding collaboration beyond banks and FIUs to include sectors like money services businesses and online marketplaces. The session showcased how initiatives like



Project Anton are enhancing global co-ordination to detect and disrupt the financial flows behind environmental crimes.

- CITES Rhinoceros Enforcement Task Force Meeting: 2025  
SAMLIT presented its achievements at the CITES Rhinoceros Enforcement Task Force Meeting, hosted by the CITES Secretariat and the DFFE. Held under Decision 19.120 from CoP19, the meeting gathered key range states, affected countries, ICCWC, and other experts to strengthen global strategies against rhino poaching and trafficking.

### **Training**

FishFORCE, which is an academy for the training of officials involved in the fight against fisheries crime, in collaboration with the NPA, hosted three training sessions attended by NPA prosecutors, Fishery Control Officers and Environmental Management Inspectors from the DFFE, provincial and parks authorities and the SAPS Stock Theft and Endangered Species Unit, during which the subject matter of fisheries crimes linked to racketeering and money laundering was addressed.

## **RECOMMENDATIONS**

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While there has been significant improvement in collaboration across law enforcement and conservation sectors in South Africa, there is a continued need for enhanced reporting quality from financial institutions. For example, institutions must provide complete profiles of suspects and relevant parties.

Training for bank officials is recommended to improve the quality and detail included in suspicious and unusual transaction reporting. Training should also include other accountable institutions namely, investment advisors, gambling operators, dealers of high-value goods, and crypto asset service providers, as reports from these entities have increased in relation to IWT.

## **CASE STUDIES AND INDICATORS**

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One of the IWT Task Force's roles is to improve knowledge and understanding on identified IWT crime types for the banking sector and more broadly, accountable institutions so that their awareness and reporting can be improved. The IWT Task Force performs this role by continuing to conduct regular case reviews to extract learnings from prosecuted cases and refine typologies and tools for the banking sector and other accountable institutions. A case digest framework was developed to construct a mechanism through which the IWT Task Force could perform regular case reviews. The full framework is included in the EWG / IWT Task Force's previous publication.

# ILLEGAL WILDLIFE TRAFFICKING CASE

## DIGEST: ABALONE

October 2025

### CASE TYPE AND BACKGROUND

- International distribution and trafficking of abalone to foreign countries.
- The syndicate illegally harvested, processed (by drying the abalone), packaged, concealed, transported, traded and trafficked abalone, valued at R8.3 million, across the borders of South Africa. Consignments were concealed in a hidden compartment underneath a truck, specially designed to avoid detection and seizure.
- The truck was stopped for inspection at the border gate between South Africa and Botswana. The driver was requested to park the truck on an inspection ramp. The driver and his co-driver abandoned the truck and fled on foot, crossing the border back to Botswana.
- In December 2022, the truck driver was arrested at the Groblersbrug border post, leaving South Africa for Botswana as an undocumented person. He was later identified as a Zambian citizen.
- The Border Inspector discovered the hidden compartment after noticing a suspicious shape on the truck's chassis that didn't match the shape expected for the truck's calibre. Upon further investigation, inspectors discovered the hidden compartment containing the dried abalone.
- During the follow-up investigation, it was established that:
  - The trafficking route originated in the Eastern Cape
  - The syndicate followed road transport networks by using trucks
  - The abalone consignment was *en route* from South Africa to Zimbabwe via Botswana. Both countries are landlocked and, therefore, do not have marine resources.

### FINANCIAL FLOW INDICATORS

- Driver was profiled using his date of birth
- The driver was undocumented which made it difficult to profile for financial indicators
- This is a typical profile of couriers
- Law enforcement contacted the Asset Forfeiture Unit in Polokwane regarding the forfeiture order to ascertain if the truck owner has responded.

### INVESTIGATION SUCCESSES / OPPORTUNITIES / LESSONS LEARNT

- Money laundering charges were added due to the training and awareness of law enforcement, who knew that if a suspect obtained property associated with criminal activities, the property would be regarded as the proceeds of crime. The concealment of such property indicated that it was tainted as the proceeds of crime, with an intention to avoid prosecution, and thus constitutes money laundering.
- The truck was forfeited to the State
- Trafficking routes constantly change due to law enforcement efforts, and as part of the syndicate's *modus operandi* to avoid detection. NB: Concealment methods contribute to the financial investigation if traceable.

### MODUS OPERANDI / TYPOLOGY / ACCUSED PROFILE

- The accused arrived at the Groblersbrug border post (in Limpopo province) between South Africa and Botswana, driving a truck with false number plates and a hidden compartment containing large quantities of dried Abalone in potato bags.
- Accused one, a Zambian male, date of birth 1989-06-21.
- This was a new route for abalone smuggling. Usually, abalone is smuggled to Mozambique, but now it is also smuggled through Botswana to Zimbabwe.
- Syndicates from the Eastern Cape used this route, making it difficult for law enforcement in landlocked Botswana and Zimbabwe, who find it difficult to identify abalone because they are unfamiliar with the species.
- The truck was using false Zambian number plates.
- The abalone was concealed in 135 potato bags.
- All the abalone was dried, with a total weight of 1350 kilograms.
- Abalone was concealed inside a hidden compartment under the truck, specially designed for concealment.
- The accused entered South Africa as an undocumented person.

### LEGAL PROCEEDINGS

Charges: including but not limited to

- Count 1: Landing, selling, receiving or possession of fish (abalone) in terms of Section 13 of the Marine Living Resources Act, Act 18/1988. Three years imprisonment
- Count 2: Entering the Republic of South Africa without a valid passport. Two years imprisonment
- Count 3: Unlawful acts in relation to registration plates, registration marks or certain documents. Three years imprisonment
- Count 4: Money Laundering. Ten years imprisonment
- Count 5: Failure to declare all goods acquired abroad prohibited under law into the Republic. Eight years imprisonment
- A total of 26 years imprisonment, all accounts will run concurrently and serve 10 years imprisonment.

### OTHER / GENERAL

- All border posts are critical in the detection of wildlife products and this case highlights that awareness does contribute to the prevention and detection of trafficked wildlife and products.
- The instruments used to traffic wildlife and wildlife products, in this case a truck, needs to be targeted and forfeited.