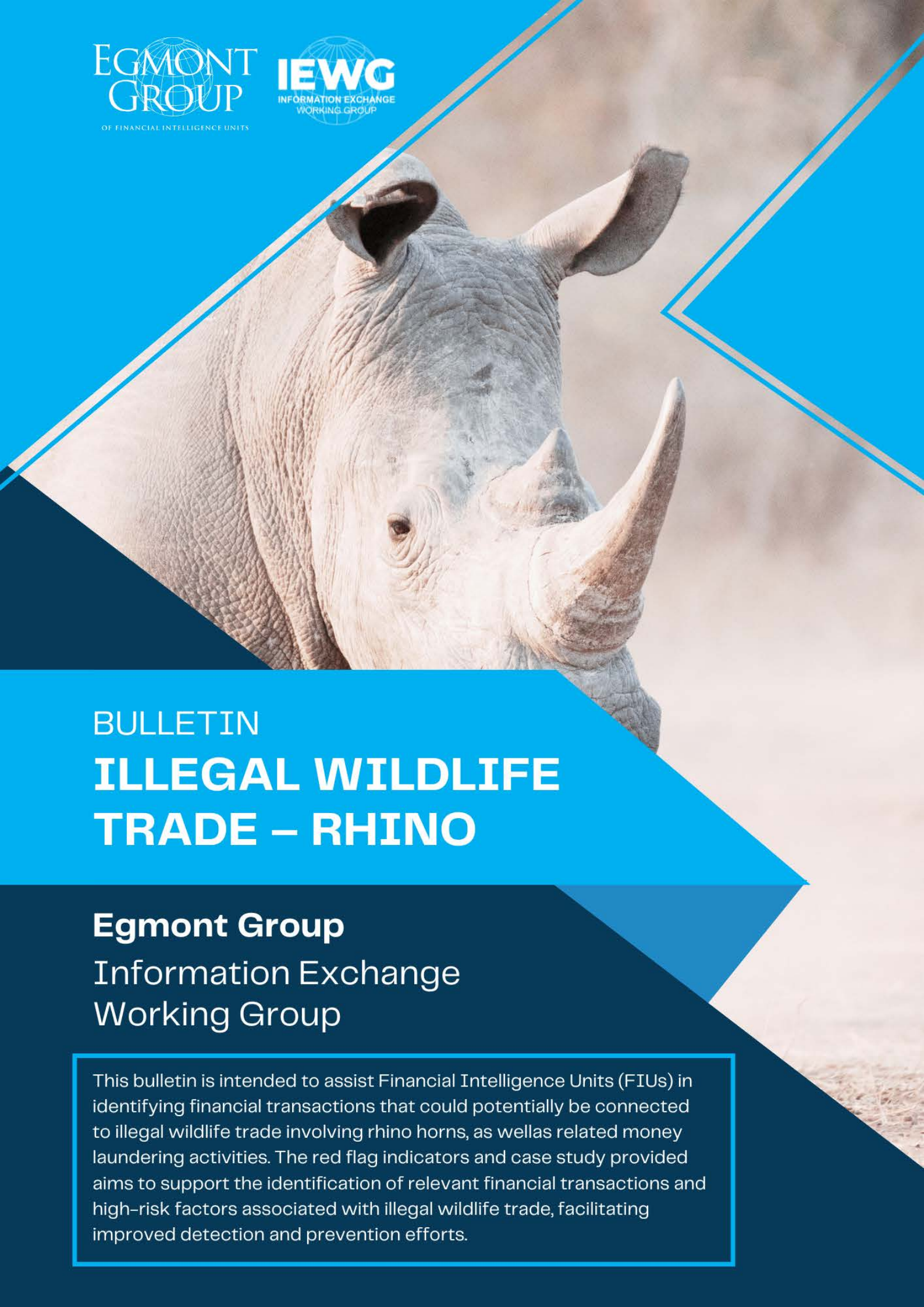




# BULLETIN **ILLEGAL WILDLIFE TRADE – RHINO**

**Egmont Group**  
Information Exchange  
Working Group

This bulletin is intended to assist Financial Intelligence Units (FIUs) in identifying financial transactions that could potentially be connected to illegal wildlife trade involving rhino horns, as well as related money laundering activities. The red flag indicators and case study provided aims to support the identification of relevant financial transactions and high-risk factors associated with illegal wildlife trade, facilitating improved detection and prevention efforts.

## Egmont Group Information Exchange Working Group

### Environmental Crimes Bulletin: Illegal Wildlife Trade – Rhino

#### INTRODUCTION

FIUs can support efforts to fight illegal wildlife trafficking by generating actionable financial intelligence for the use of law enforcement who work on environmental crimes. The Egmont Group is issuing this bulletin to notify FIUs and their jurisdictions about financial transactions associated with wildlife trade that are illegal. Wildlife trafficking in South Africa represents one of the most pressing environmental and criminal challenges facing the country today. As both a source and transit country, South Africa plays a pivotal role in the global illegal wildlife trade, which targets high-value species such as rhinos. This illicit industry is driven by transnational syndicates that exploit corrupt officials, financial facilitators, logistics operators, and others, and use sophisticated smuggling routes, often using air, land, and maritime transport to move contraband to markets in Asia and the Middle East.

#### What is rhino horn trafficking

Actors in complex criminal networks are the main drivers of rhino horn trafficking in South Africa. They operate local, regional, and international networks.

**In South Africa, rhino poaching** is regarded as a priority crime because it is driven by transnational criminal syndicates. The breeding and harvesting of the rhino horns is strictly controlled by respective environmental agencies.

**Demand for rhino horn** remains a dominant contributor to the involvement of transnational criminal syndicates sustaining the supply to clients who are often based in the Asian markets, including those in China, Vietnam, and Thailand.

#### Rhino horn poaching

International trade in Rhino Horns has been banned by CITES since 1977<sup>1</sup>. Therefore, any commercial trade related to rhino horns without legal authorisation will constitute trafficking. The purpose of the ban is to prevent the commercial exploitation of endangered species to the detriment of extinction. The killing of the rhinos for their horns, if left unchecked will drive the species to extinction. Hence, given the gravity of the problem, the killing of rhinos to harvest their horns for sale is a national priority crime in South Africa.

The latest statistics from the DFFE for the period 1 January to 31 March 2025<sup>2</sup> report that 103 rhinos were poached nationwide, translating to an average of 34.33 rhinos per month. This rate is consistent with the preceding twelve-month average, which stands at 35 rhinos monthly (420 annually), highlighting persistent challenges faced by rhino populations and emphasizing the necessity for enhanced anti-poaching initiatives. A provincial analysis shows that SANParks experienced the highest losses, with 65 rhinos poached. KwaZulu-Natal documented 16 incidents, Limpopo 10, Free State 5, North West 4, and Mpumalanga 3. Notably, there were no recorded

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<sup>1</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, See Sixty-first Meeting of the Standing Committee Geneva (Switzerland), 15-19 August 2011 Interpretation and implementation of the Convention Species trade and conservation Rhinoceroses CONSERVATION OF AND TRADE IN AFRICAN AND ASIAN RHINOCEROSES.

<sup>2</sup> [https://www.dffe.gov.za/index.php/speeches/george\\_zerorhinopoaching](https://www.dffe.gov.za/index.php/speeches/george_zerorhinopoaching)

poaching cases in the Eastern Cape, Northern Cape, Western Cape, or Gauteng during this period.

The Department of Forestry, Fisheries, and the Environment (DFFE)<sup>3</sup> reported that enhanced efforts in money laundering investigations and international co-operation led to the arrest of 26 out of 132 rhino horn traffickers in 2022, including 13 for money laundering and bribery. In 2022, arrests and prosecutions were carried out as part of Project Blood Orange and other investigations. The Directorate for Priority Crime Investigation (DPCI) and DFFE have participated in international collaborations involving South Africa and other countries associated with wildlife crime. DPCI has conducted joint investigations with Singapore, Vietnam, and the People's Republic of China. Recently, South Africa and Singapore won the award for Asia-Africa cooperation in the fight against illegal trade in wildlife at the Asia Environmental Enforcement Recognition of Excellence 2024-2025.

The market for rhino horn is highest in Far Eastern countries, specifically China and Vietnam. Traffickers of live wildlife tend to use direct flights to transport the animals, but rhino horn traffickers are more likely to move contraband through indirect routes and via airports, which they regard as having inadequate detection methods and insufficient knowledge of smuggling methods. Rhino horn traffickers also exploit legal loopholes for the import and export of trophies, smuggling rhino horns or other illegal wildlife products as legal wildlife commodities. Poachers and traffickers in the Xaysavang Network (an international wildlife trafficking syndicate facilitating the killing of endangered elephants, rhinos, pangolins, and other species, for products such as ivory and rhino horn) had horns from poached rhinos mounted as hunting trophies for export by an animal taxidermist. The trophies provided a cover for getting the horn from South Africa into Asia, where it entered the black market as rhino horn for medicinal purposes.

### The importance of disruption

The International Rhino Foundation (IRF) released a report in 2025<sup>4</sup> indicating that the global rhinoceros population stands at approximately 26,700. South Africa is home to 14,389 rhinos, comprising 2,307 black rhinos and 12,082 white rhinos. According to the United Nations Office on Drugs and Crime<sup>5</sup>, financial flows associated with the rhino poaching supply chain may reach up to US\$390 million, depending on the level of complexity.

Rhino poaching in South Africa decreased in 2025 relative to prior years. The graph below presents statistics from DFFE, compiled by Global Conservation Force<sup>6</sup>, detailing rhino horn data from 2014 to 2025.

According to the Minister of Forestry, Fisheries and the Environment, Mr. Willie Aucamp<sup>7</sup>, South Africa's anti-poaching and anti-trafficking initiatives resulted in a 16% reduction in rhino poaching

<sup>3</sup> [https://www.dffe.gov.za/mediarelease/creecy\\_feedbackantipoachingefforts\\_mar23](https://www.dffe.gov.za/mediarelease/creecy_feedbackantipoachingefforts_mar23)

<sup>4</sup> [State of the Rhino | International Rhino Foundation](#) International Rhino Foundation 2025 State of the Rhino

<sup>5</sup> UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species at P 17 and 128.

<sup>6</sup> <https://globalconservationforce.org/2025-rhino-poaching-numbers-south-africa-progress-pressure-points-and-the-path-forward/#:~:text=Most%20of%20these%20losses%20occurred,testing%20of%20law%20enforcement%20personnel>

<sup>7</sup> [16% Decline in rhino poaching shows the impact of anti-poaching and anti-trafficking efforts, says Minister Aucamp | Department of Forestry, Fisheries and the Environment](#)

in 2025 compared to 2024. During the period from January to December 2025, 352 rhinos were poached nationwide: 266 on state properties and 86 on private parks, reserves, or farms. This figure represents a decrease of 68 from the 420 rhinos poached in 2024. Mpumalanga Province experienced the highest incidence, recording 178 rhinos lost, an increase from 92 in the previous year. Notably, Kruger National Park accounted for 175 of these cases in 2025, which is an increase of 87 compared to the 88 reported in 2024.



South Africa, with most of the continent's rhinos, experienced declines from 2010 until 2024<sup>8</sup>. This is largely due to declines in Southern white rhinos in state-protected areas and particularly in one large National Park (Kruger National Park) as well as some provincial reserves. Most recently, this included a relatively large provincial protected area (Hluhluwe-Imfolozi Park). The downward trend in the Kruger National Park was partially attributed to ongoing dehorning programs and co-operative efforts between law enforcement, conservation authorities, and the private sector, such as the South African Anti-Money Laundering Integrated Task Force (SAMLIT) initiative under Project Blood Orange.<sup>6</sup> Arrests of individuals involved in trafficking activities have also impacted poaching dynamics and the illegal trade in rhino horn. Rhino horn usually leaves South Africa via OR Tambo International Airport, Cape Town International Airport and Durban harbour, or via road into neighbouring countries including Namibia, Zimbabwe, and Mozambique. It is also known to be sent via mail centers and courier companies.

<sup>8</sup> African and Asian rhinoceroses – status, conservation and trade - [E-CoP20-084-A3.pdf](#)

## Monitoring of legal trade in rhino horns

Trading in rhino horns is permitted within the Republic of South Africa. Trade is regulated by DFFE by means of Norms and Standards and permit applications. These applications are in terms of Threatened or Protected Species (TOPS) regulations and approved by the Minister DFFE at national level.

Below are the strict legal requirements related to TOPS:

- Rhino horn must be legally obtained.
- Applicants must not have been convicted of an offence in terms of South Africa National Environmental Management: Biodiversity Act (NEMBA).<sup>9</sup>
- The applicant should not be under investigation for contravention or failure to comply with any provisions of NEMBA.
- Rhino horns to be traded must be registered on the national rhino horn database.
- The DNA analysis of the rhino horns to be traded must have been done in terms of the Norms and Standards.
- All applications must be accompanied by supporting documentation of the buyer and seller.

## TRENDS AND TYPOLOGIES

### Areas prone to illegal wildlife trade

In the first quarter of 2025, 103 rhinos were killed<sup>10</sup>, reflecting ongoing threats from organised crime networks. While poaching rates are similar to 2024 (35 per month in 2024 vs 34 per month so far in 2025), there has been a shift in location: incidents in KwaZulu-Natal dropped from 232 in 2024 to 16 between January and March 2025, while poaching in South African National Parks increased, with 65 rhinos lost in the first three months compared to 88 across all of 2024. Crime syndicates adapt their operations based on law enforcement changes, linking rhino poaching to broader criminal activities like trafficking and money laundering. These networks operate internationally, exploiting vulnerabilities as they relocate.

Rhino horn trafficking continues to impact South Africa, with poaching rising again in late 2024 and early 2025, despite an earlier decline. Organised syndicates continue to target rhinos even after dehorning, with 21 dehorned rhinos poached in Kruger National Park in December 2024 and another 17 in January 2025.

Environmental crimes are often linked to Asia through wildlife trafficking networks. Some countries supply species, while others act as transit or export hubs for illegal wildlife goods.

Cross-border wildlife crime is a major issue in southern Africa, threatening local species and ecosystems while hindering regional economic development. Poaching activity persists, often

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<sup>9</sup> NEMBA Act 10 of 2004 protects threatened or protected species in South Africa. It is found at [https://www.dffe.gov.za/sites/default/files/legislations/nema\\_amendment\\_act10\\_0.pdf](https://www.dffe.gov.za/sites/default/files/legislations/nema_amendment_act10_0.pdf).

<sup>10</sup> [Minister D. George \(Dr\): Leads South Africa's fierce battle, celebrating zero rhino poaching in four provinces while addressing the loss of 103 rhinos to poaching peril in 2025 | Department of Forestry, Fisheries and the Environment](#)

involving crime syndicates that operate across national and international borders and generate significant illicit profits. The region sees regular poaching and trafficking incidents, especially where certain species are targeted, with rhino horns being the most commonly seized illegal item. Countries primarily responsible for extracting rhino horn illegally from South Africa are Malaysia and Vietnam.

### Industries involved in illegal wildlife trade of rhino horn

Identified industries associated with IWT, as stated in regulatory reports.

- |                                      |                                      |
|--------------------------------------|--------------------------------------|
| • Guest houses                       | • Estate agencies                    |
| • Travel and tour companies          | • Chinese restaurants                |
| • Import or export firms             | • Wholesalers                        |
| • Car dealerships                    | • Bulk wine sellers                  |
| • Safaris                            | • Machinery manufacturers            |
| • Accountants                        | • Logistics                          |
| • Investment cooperatives            | • Air freight, and trading companies |
| • Forex agents                       | • Casinos                            |
| • Construction and medical suppliers | • Breeders (such as birds)           |
| • Consultancy services               | • Conservation.                      |

### Nationalities involved in illegal rhino trade

The nationality of perpetrators identified in the suspicious and unusual transactions reported were mostly recognised as **South Africans, Chinese, Malawians, Nigerians, Zimbabweans**, while other nationalities were also reported.

- |                  |              |
|------------------|--------------|
| • South Africans | • Taiwanese  |
| • Zimbabweans    | • Malawians  |
| • Chinese        | • Nigerians  |
| • Mosotho        | • Koreans    |
| • Ugandan        | • Pakistanis |
| • Malawians      |              |

## Money laundering methods

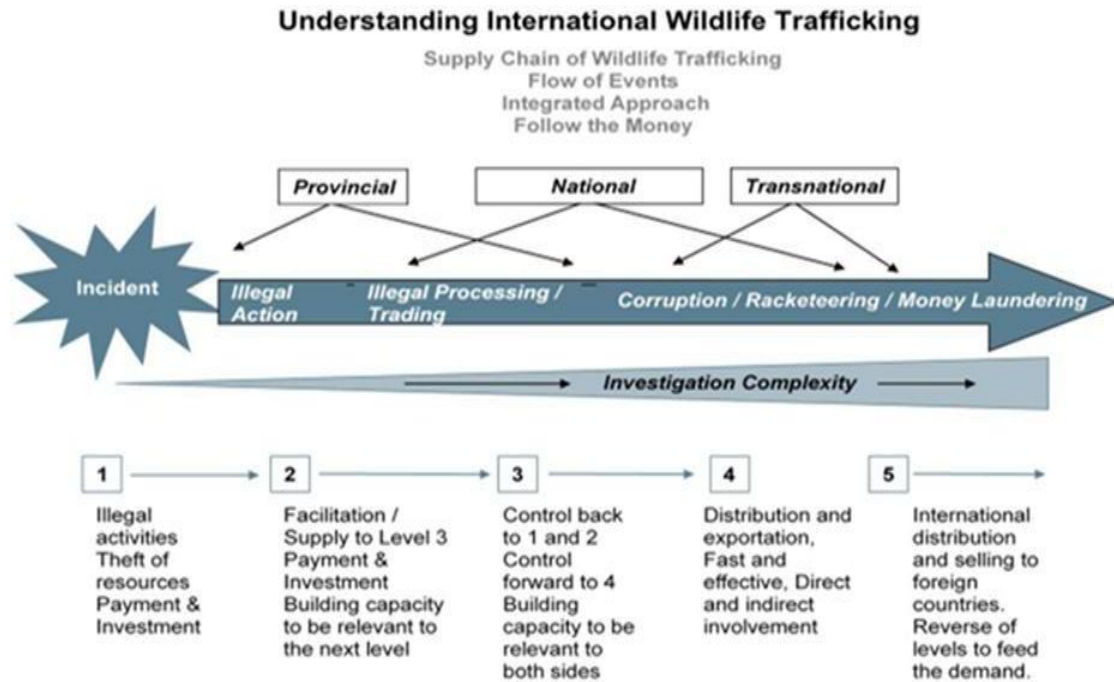


Figure 1: Understanding International wildlife trafficking.

Outlined below are some of the methods used in rhino poaching operations in South Africa, as well as the processes by which funds are transferred among involved parties.

- The syndicate comprised of rhino horn buyers. The undercover agent informed the syndicate that the horn originated from the Kruger National Park stockpile.
- The undercover agent met accused one in China Town, Johannesburg, was taken to a guest house in Johannesburg, to an area well known for Chinese organised crime, where he met accused two. Accused two took the horn from the agent and left the premises to inspect its quality. The investigation revealed that accused two went to a casino, before returning with cash to pay the agent.
- The syndicate operated in cash and made use of casinos to launder the proceeds of sales.
- Accused two purchased a vehicle in cash which was used for the syndicate's criminal operation.
- Accused one offered to show the undercover agent how to launder money through a casino, the third accused (life partner of accused one) took the physical cash paid to the agent, to assist the agent to open a casino account and made cash deposits.
- The syndicate was also allegedly involved in trading gemstones and timber, suspected to be illegal. Accused one was also allegedly connected to illegal trade of donkey skins.

- The syndicate consisted of a Taiwanese national and two Chinese nationals. Accused one and three has citizenship in South Africa with accused two being an illegal immigrant who had previously been deported.
- All were between the ages of 45 to 55 years.
- Lifestyle indicators – the investigation showed deliberate downplaying of income and lifestyle.
- Counter actions: The accused were cautious of mobile tracking or tracing methods and used burner phones. The syndicate made use of counter surveillance techniques to protect and avoid exposure to the syndicate's activities.
- A client who was the subject of investigation had transaction links with individuals who were previously involved in rhino poaching syndicates.
- Multiple low value transactions were conducted within a short period of time e.g. savings account with low value (R10 – R10 000 per deposit) and high volume (1 500 transfers) transactions.
- Individuals conducted several cash deposits locally, followed by multiple balance enquiries, whereafter an overseas cash withdrawal would take place. The syndicate was led by individuals with deep ties to poaching operations and smuggling routes, such as Mozambican kingpins and South African intermediaries. Together, these actors form a web of influence that sustains the illicit trade in rhino horn, posing a persistent threat to wildlife conservation and regional security. International partners include organisations like INTERPOL, United for Wildlife, Wildlife Justice Commission etc. play a critical role in tracking and disrupting the global supply chain

## FINANCIAL FLOW INDICATORS

The accused used casino accounts to launder criminal proceeds by spending and withdrawing money from these accounts. All payments for rhino horn were made in cash. A Financial Intelligence Centre (FIC) regulatory report flagged the accused for a suspicious cash vehicle purchase which was reported by the dealership. Criminal *subpoenas* were submitted to the accountable institutions for the relevant accounts and the FIC further identified and traced an international transfer via Western Union. The fine for accused two was scheduled to be paid in cash, but the cash was stolen in front of the court. The fine was subsequently settled via electronic funds transfer.

### Case Study (Rhino horn trafficking) STRs linked to IWT

One of South Africa's biggest private rhino captive breeders in southern Africa is a well-known advocate for selling rhino horns on the international markets. He has challenged the South African government on various issues pertaining to the moratorium on the trade in rhino horn on the international market. After a failed bid to sell the rhino horns in an online auction, he allegedly devised a scheme to sell his stock of rhino horns.

The rhino breeder and his co-accused devised a scheme to recruit "buyers of the horns" who would have obtained permits from a government department. The Directorate for Priority Crime Investigation (DPCI), which deals with illegal wildlife priority crimes, obtained information on the unlawful scheme. Investigations revealed that enterprise used information of nine people to obtain permits to buy the rhino horns from the rhino breeder. These nine people were unaware that their personal information had been used to obtain permits to purchase the rhino horns. The permit applications were facilitated by "in house attorneys" employed by the rhino breeder.

DPCI was able to recover rhino horns in South Africa and seized 56 rhino horns at OR Tambo International Airport that were destined for Vietnam. In addition, rhino skins belonging to rhino breeder's stock were also seized during the arrest of a Chinese and African undocumented person.

DPCI arrested the rhino breeder and seven people for the unlawful scheme. DPCI has charged them and their business enterprise under the racketeering laws. DPCI alleges that the rhino breeder and his associates intended to defraud the country by obtaining fraudulent permits to create "proxy authorisations" to sell rhino horns within South Africa. The scheme is alleged to have facilitated obtaining fraudulent permits for 964 rhino horns valued at R250 million.

Financial investigations revealed that the enterprise engaged in cash-based transactions with only one transaction traced to a bank account. Investigators traced cash deposited directly into bank accounts and transferred to third parties. Some of the accused will be charged for money laundering in addition to the racketeering offences.

### RED FLAG INDICATORS

The following indicators are related to illegal wildlife trade, including the types and patterns of transactions associated with these crimes. Indicators should not be treated in isolation but should be assessed in combination with what financial institutions know about their clients and other factors surrounding the transactions.

- High volume inflow international fund transfers
- Round amount transactions
- High volume cash deposits
- Small, aggregated cash deposits made on the same day to avoid reporting on threshold amounts being exceeded
- Cash deposits occurring on the same day at various locations (bank branches/ATMs), possibly across different cities or provinces
- Personal accounts used for business purpose payments.

### General red flag indicators relating to illegal wildlife trade.

- Reports of business accounts without any business-related expenditure featuring in the account such as salaries and tax payments.
- Personal accounts do not display usual activity, such as salary credits, living expenses and debit orders.
- Rapid disposition of funds after receipt from both personal and business accounts.
- Abuse of accounts of minors.
- Customer's inability to confirm source of funds or wealth.
- Prevalence of the use of cash.
- Methods of payment and laundering are more sophisticated higher up in the supply chain, and basic cash or barter tends to take place at the lower levels.
- The use of front companies and enablers. Many of these businesses appeared to be legitimate but analysis of their transactions points to large incoming flows and shows few legitimate business expenses.
- The use of money mules.
- Money flows associated with IWT often linked to other crimes, such as fraudulent documentation or paperwork, trade-based money laundering including over- or under-invoicing, or fictitious invoicing, as well as corruption to facilitate the inflow of funds into South Africa.
- Casinos and retail stores often used to transfer funds back into South Africa.
- Funds leaving South Africa are predominantly in US dollars, Canadian dollars, Euro or Thai Baht, and are moved out of the country through suspected cash smuggling and money transfer systems.
- More funds being sent out of South Africa by wildlife traffickers, than that coming into the country.
- Unusual cash deposits and EFTs into game park rangers' and other informers' accounts, and unusual cash spending on flashy or expensive items such as cars and houses (boats in the case of abalone poachers).
- The use of the legal wildlife industry to mask illegal trade.
- Cash-in-transit and transport industries feature heavily in the IWT industry.
- EFTs are primarily associated with actors involved higher up in the supply chain.
- Gift and payment cards are used to make payments to level two or three intermediaries.
- Mobile money payments are prominent in the lower levels of the value chain.
- The suspected use of attorney trust accounts – purchase of properties either through cash or attorney trust accounts.

## RESOURCES:

**Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).** *Conservation of and trade in African and Asian rhinoceroses.* Sixty-first Meeting of the Standing Committee (SC61 Doc. 45.2), Geneva, Switzerland, 15–19 August 2011.  
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