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SERIAL: M-15032018
COUNTRIES: Kenya, Global

ALERT ---- MARITIME

SUBJECT: **Port of Mombasa, Kenya Remains a Key Wildlife Trafficking Export Location**

DATA: The port at Mombasa, Kenya (UN/LOCODE: KEMBA) is highly vulnerable to illicit wildlife trafficking activity, in particular related to the illegal export of elephant ivory. Mombasa is a long-standing export hub for illicit ivory, with multiple major cases of wildlife trafficking involving Mombasa documented in recent years and open source and confidential reporting indicating that this activity is ongoing.

Modus Operandi:
According to open and confidential sources, criminal networks are able to consistently traffic large quantities of illegal ivory, as well as less frequently rhino horn and other wildlife products, via Mombasa Port.

The following current critical trends related to illicit wildlife trafficking involving the Port at Mombasa are evident in open source, NGO, and law enforcement reporting as well as Taskforce analysis of past seizures and enforcement actions:

1. AN ESTABLISHED REGIONAL EXPORT HUB: Mombasa port has a long record as an key export hub for illicit elephant ivory, most commonly in recent years in the form of large multi-ton shipments of ivory sourced from throughout East and Central Africa, according to historical enforcement data. Current reporting from open and confidential sources indicates that while the exact levels of activity appear to ebb and flow, especially in response to enforcement pressures, multiple illicit trading networks implicated in wildlife trafficking continue to actively operate in Mombasa.

2. CORRUPTION A LARGE PROBLEM: Mombasa port is highly vulnerable to corruption, especially among port and customs personnel, according to historical seizure data and current open source and confidential reporting. Numerous allegations of corruption against port and customs officials working at Mombasa port, as well as higher level port

management and local political leadership, have been published in open source media and NGO reports, citing extensive collusion between port officials and illicit ivory as well as narcotics smuggling networks. Documented examples of corruption include:

- Assisting traffickers with falsifying shipping documents and/or bypassing export paperwork requirements.
- Allowing containers to pass through the port without being inspected or screened.
- Enabling containers to be declared lost when they are not.
- Facilitating the opening or switching of containers after being sealed/bonded.
- Facilitating the theft of containers for later use to smuggle contraband.

3. LOCAL IMPORT/EXPORT COMPANIES IMPLICATED: Ivory trafficking networks operating out of Mombasa appear to have close working relationships with corrupted or complicit freight forwarders, shipping agents, transport companies, container freight stations (CFSs), and import/export companies located in or near Mombasa, according to available information. These complicit local companies typically engage in legitimate business activity alongside their illicit activities, and reportedly sometimes specialize on specific routes and destinations for export of illicit goods, including wildlife.

PICTURED: LEFT – Mombasa businessman Feisal Ali Mohammad, sentenced in July 2016 to 20 years in prison in Kenya for wildlife trafficking offenses related to the 2014 seizure of 2 tons of ivory in Mombasa (Photo credit: The Guardian). RIGHT – Suspects arrested in 2015 related to two seizures in Singapore and Bangkok of a total of over seven tons of ivory. The individuals arrested included the owner of a Mombasa-based import/export company, three employees of a Mombasa freight forwarding company, and one Kenya Revenue Authority employee (photo credit: The Star, Kenya)

4. COMMODITY DECLARATION PATTERNS: TIMBER, TEA, PRECIOUS STONES: Wildlife trafficking activity out of Mombasa in recent years has been most associated with a variety of commodities, but with strongest association with shipments declared as timber, tea, and 'precious stones', according to Taskforce analysis of open source and confidential reporting.

5. CONVERGENCE WITH NARCOTICS TRADE: The port of Mombasa is reportedly also a site of other illicit activities, in particular the transshipment of heroin originating from Afghanistan and Pakistan and cocaine from Latin America. According to law enforcement sources, substantial overlaps exist between drug trafficking and wildlife trafficking networks operating in and around Mombasa.

Geography:

The Indian Ocean port of Mombasa is located at coordinates -4.0475° / 39.635° in Kilindini Harbor off Mombasa island in Kenya. First developed in the 18th century, Mombasa Port is East Africa's largest and also the primary maritime export port for commodities from the vast inland areas of Congo and central Africa. The port is well connected with most other major international ports, especially in Asia, the Middle East, and Europe.

Mombasa port is a key transit hub for elephant ivory and other wildlife products originating from throughout East and Central Africa, typically smuggled into Kenya overland or by small boat from Tanzania, or by road or rail from Uganda. Transit trade agreements between the governments of Kenya and Uganda mean that often shipments from Uganda are not required to be inspected at Mombasa before onward exportation, a provision reportedly often exploited by ivory traffickers.

Multiple recent illicit wildlife trafficking shipments from Mombasa have been documented in connection with Singapore, as well as Thailand, Malaysia, Cambodia, China, Viet Nam, Lao PDR, and Colombia.

Red Flags:

Although traffickers regularly modify their tactics and routings to avoid detection, the following – especially in combination with one another – may indicate a higher risk of wildlife trafficking activity related to shipments originating in Mombasa Port, Kenya:

- Declared shippers or recipients who have been implicated in previous wildlife trafficking activity.
- Use of freight forwarders, import/export companies, or other shipping agents that have in the past been implicated in either illegal wildlife cases or other criminal or corrupt activity.
- Shipments declared as timber or precious stones.
- Anomalies or discrepancies in container histories.

- ▪ Shipments with declared onward destinations in Singapore, Cambodia, China, Malaysia, Viet Nam, Lao PDR, or Thailand.
- ▪ Shipments with an illogical or unclear business purpose.

ACTIONS:	This alert is assessed as most relevant to the general categories of action checked below. **All decisions and actions informed by this alert are the sole responsibility of the receiving organization** ☒ Conduct reasonable checks on shipments fitting a similar profile ☒ Execute / enhance internal controls or procedures relevant to this information ☒ Report / share information to customs / law enforcement ☐ Information has potential security implications for company employees

SOURCE:	This advisory is based on UfW Transport Taskforce analysis of recent enforcement actions as well as open source and confidential reporting from partners. We have *high* confidence in the reliability and validity of this information, with the following caveat: the data upon which this analysis is based is exclusively anecdotal and is therefore inherently limited to available information and likely incomplete.
PRIORITIES:	This alert is related to the following Transport Taskforce information sharing priorities (checked): ☒ Wildlife trafficker networks, behavior, intentions, and operational tactics and strategy ☒ Indicators of suspicious or higher risk activity ('red flags') related to wildlife trafficking ☒ Data potentially reportable to or shareable with law enforcement ☐ Security/physical risks and vulnerabilities to transport company operations, facilities, or staff ☐ Unintentional facilitation of illegal wildlife demand or retail trade
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CONTACT:	For questions or additional data/analysis relevant to this alert, or to report suspicious shipments or indicators of wildlife trafficking activity, please contact the UfW Transport Taskforce: transport@unitedforwildlife.org
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