

# The Importance of Whistleblowers in Combatting Wildlife Trafficking

Article By:

Kelsey Condon

---

Last week, the United Nations (“UN”) Office on Drugs and Crime issued a [report on wildlife trafficking](#). Wildlife crime is a multibillion-dollar transnational industry presenting one of the greatest dangers to the survival of species worldwide. It also threatens national security around the world, undermining the rule of law and creating avenues for corruption.

Despite increasing global regulation, wildlife crime continues to grow. For example, the UN report and a 2020 [report released by the Wildlife Justice Commission](#) (“WJC”) found a dramatic increase in the trafficking of pangolin scales in the past five years, with nearly a tenfold increase in seizures between 2014 and 2018. One reason for this increase may be new laws in one country, prompting wildlife traffickers to move their operations to less-regulated countries with a lower risk of punishment. Likewise, not all countries have the capacity to effectively manage or enforce wildlife regulations as illegal wildlife products move in or out of a country’s jurisdiction.

The UN report notes several issues that should be addressed in order to help combat wildlife crime, including addressing corruption and money laundering. Government corruption and [bribes play a large role in facilitating wildlife crime](#), and can make detecting and prosecuting such violations even more difficult. Traffickers “engage in corruption to create the veneer of legitimacy,” using bribes to government officials to enable this façade. The UN report found that because bribes are paid “across all stages of the wildlife supply chain” – including to police officers, customs officials, park rangers, and elected officials – “[a]ddressing corruption is foundational to preventing wildlife crime.”

Additionally, [laundering money provides a further means of obscuring and legitimizing wildlife crime](#). Concealing illicit proceeds in foreign banks or through the use of shell companies can help traffickers avoid scrutiny from both domestic and foreign law enforcement authorities. By “following the money,” law enforcement can identify trafficking networks and prosecute the individuals involved in wildlife crimes as well as money laundering and other associated forms of international crime.

Due to the secretive and sophisticated nature of wildlife crime, detection and prosecution of these underground networks is challenging without inside knowledge. Whistleblowers are therefore a crucial source of information to combatting wildlife trafficking. Multiple U.S. reward laws are uniquely designed to combat such crime by providing incentives for whistleblowers with high-quality information to assist law enforcement in stopping criminal networks.

- 
- The Foreign Corrupt Practices Act (“FCPA”) prohibits publicly traded companies from bribing foreign officials in order to obtain or retain business, and mandates proper financial record-keeping. For example, if a publicly traded shipping company bribed a non-U.S. official at a port so that the company could load pangolin scales onto the ship without the official interfering, this would violate the FCPA. Whistleblowers who report violations of the FCPA are awarded a percentage of the proceeds collected through a successful enforcement action.
  - The False Claims Act (“FCA”) penalizes, among other things, individuals and organizations that commit U.S. customs fraud. This includes incorrectly labeled wildlife or wildlife products imported into the U.S. Whistleblowers who report FCA violations are awarded a percentage of the proceeds collected through a successful prosecution.
  - The Bank Secrecy Act, USA PATRIOT Act, Securities Exchange Act, and the FCPA all cover the financial industry and penalize money laundering activities. The Internal Revenue Service (“IRS”), Securities and Exchange Commission (“SEC”), and Commodity Futures Trading Commission (“CFTC”) all provide rewards to whistleblowers for reporting money laundering offenses.
  - The Lacey Act makes it unlawful for any person subject to U.S. jurisdiction to import, export, transport, sell, or purchase fish, wildlife, or plants in violation of any U.S. or foreign law, including the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”). Unlike the above laws, the Lacey Act authorizes rewards for simply reporting violations of the law, regardless of a successful prosecution. Other wildlife laws with similar reward provisions that may provide international jurisdiction include the Endangered Species Act, the Fish and Wildlife Improvement Act, and the Wild Bird Conservation Act.

All of the above laws include whistleblower reward provisions, and some also provide confidentiality and anti-retaliation protections. The majority of the laws listed above provide rewards regardless of U.S. citizenship or country of residence. Congress enacted these incentive laws to address the fear that most insiders have when reporting corruption. Whistleblowers need the protection and encouragement offered by these laws, which empower individuals within the criminal economy or a corrupt government to stand against the wider systemic forces they are subject to, holding the most powerful players accountable while protecting those that aid in the exposure of crime.

Whistleblower reward laws are also proven to increase the amount and quality of whistleblower disclosures. For example, in its whistleblower award letters, Fish and Wildlife Service (“FWS”) employees [consistently point to the involvement of whistleblowers for the success](#) of actions against wildlife traffickers.

Governments face myriad challenges in detecting and preventing wildlife crime. But by making reporting crime more lucrative than participating in it, and by providing confidentiality protections, whistleblowers can help law enforcement disrupt dismantle the global illicit trade in wildlife. Because this incentive model has become the most effective means for U.S. law enforcement to obtain critical information on corrupt enterprises, it should be fully implemented as an [essential tool](#) in detecting and preventing wildlife trafficking where it would have a profound impact on the future survival of endangered plants and animals.



Copyright Kohn, Kohn & Colapinto, LLP 2025. All Rights Reserved.

---

National Law Review, Volume X, Number 203

Source URL: <https://natlawreview.com/article/importance-whistleblowers-combatting-wildlife-trafficking-0>