

The Global Observatory of Transnational Criminal Networks

**The Groenewald Criminal  
Network:  
Background, legislative  
loopholes and  
recommendations**

No. 11

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*The Groenwald Criminal Network*

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## Disclaimer

The facts and the analysis presented herein are sustained in documents and interviews exposed in mass media and judicial records related to the criminal networks analyzed. No primary information uncovering facts has been gathered, which means that only secondary sources were consulted, from legal to media documents. In the case of the names mentioned, quoted or referenced on indictments —with the exception of those specifically mentioned, quoted or referenced in the text as definitively condemned-, the presumption of innocence, in observance of individual rights is always preserved.

The judicial truth is the jurisdiction of the courts, which by law will decide whether the defendants are innocent or guilty.<sup>1</sup> It is stated that belonging to, participating in, being connected to, or appearing on a network, as analyzed herein, does not imply having committed a criminal act or being engaged in a criminal enterprise. It is always possible to belong, participate, be connected, or appear on a network as an agent promoting interests that are socially and institutionally beneficial, or as a result of coercion, among other reasons unrelated to criminal acts committed by the agent.

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## Introduction

The following paper provides a brief analysis of the SNA model created by Salcedo–Albaran et al (2015) of the Groenewald gang’s involvement in illegal transnational rhinoceros<sup>1</sup> horn trade between southern Africa and Asia. What renders the case particularly interesting is the demonstrable interface between legality and illegality. This paper provides a brief perspective of the Groenewald gang in the broader wildlife crime context before assessing whether the case presents an exception or a common trend. In a second step, the legislative and institutional loopholes are discussed. The paper also assesses whether regulators are aware of the scheme and what measures have been taken to address this. Finally, an assessment is made whether “gray” nodes (legal players who participate in illegal activities) are dealt with in the most expedient manner and what lessons could be learnt from the model.

### 1. The historical context<sup>2</sup>

Mainstream media outlets and academic scholars have largely focused on “poachers” as the primary ‘producers’ of rhino horn. The common narrative relates to impoverished poachers hunting wildlife to fill cooking pots or pocket books (see for examples: Kahler/Gore 2012; Goga/Goredema/Salcedo-Albarán 2016).<sup>3</sup> However, a few sensational court cases over the past few years (2012 to 2015) showcase the involvement of rhino breeders, professional hunters, veterinarians, nature conservation officials and others in the illicit ‘production’ and trafficking of rhino horn.<sup>4</sup> These actors from the formal or ‘legal’ sector did not only orchestrate poaching in private and public conservation areas and thefts from rhino horn stockpiles, they were also involved in complex schemes that bypass existing conservation regulations, exploit regulatory loopholes and use legal trade channels to export illegally obtained rhino horn.

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<sup>1</sup> ‘Rhino’, the shortened form of rhinoceros, is used in the remainder of the paper.

<sup>2</sup> This section incorporates elements of Chapter 4 of Annette’s dissertation, entitled “Rhino protection: Parks, private land and conservation paradigms”.

<sup>3</sup> A few researchers have raised the involvement of wildlife industry professionals in the ivory trade (Naylor 2004), the raptors trade in Russia (Wyatt 2011) and the involvement of the ‘Boere-mafia’ in the rhino horn trade (Rademeyer 2012).

<sup>4</sup> Goga et al (2016) provide short summaries of the ‘big’ cases revolving around Dawie Groenewald, Hugo Ras and Chumlong Lemthongthai.

With regards to rhino poaching in southern Africa, the direct and indirect involvement of agents of the state and wildlife industry players dates back to colonial and apartheid times. The 'Kumleben Investigation into the Alleged Smuggling of and Illegal Trade in Ivory and Rhinoceros Horn in South Africa' (Kumleben 1996),<sup>5</sup> as well as hearings at the South African Truth and Reconciliation Commission (Truth and Reconciliation Commission 1998) revealed how the apartheid state received ivory and rhino horn as payment for weapons it supplied to its allies, Resistência Nacional Mocambicana (RENAMO), the União Nacional para a Independência Total de Angola (UNITA) and the Rhodesian Selous Scouts in the 1970s and 1980s. Intelligence operatives were in charge of transnational trade to Asian markets (predominantly to Taiwan). Beyond the nefarious activities of the apartheid state, a parallel process of privatization of wildlife created criminal pathways and supply chains that were to be abused in the post-colonial/apartheid period.

To understand why the private sector is particularly well-situated to orchestrate both illegal and gray rhino horn traffic, a basic understanding of the private ownership of wildlife is required. South Africa constitutes a special case within the southern African region because private individuals are allowed to own wildlife including rhinos.<sup>6</sup> Wild animals are considered *res nullius* in South African common law, meaning that nobody owns them. While this legal principle applied, landowners showed limited interest in preserving wild animals on their land.

The Transvaal Directorate of Nature Conservation<sup>7</sup> introduced the 'certificate of adequate enclosure' in 1968, which was subsequently rolled out to the other provinces. This certificate exempted landowners from regulations applicable to hunting seasons and bag limits, and wild animals thus could be hunted all year. Landowners were invited to apply for the certificate if they could demonstrate adequate game-proof fencing (Reilly 2014).<sup>8</sup> In essence, game ranchers were granted ownership over wildlife and the right to derive income from consumptive utilization, such as the killing of wild animals for profit (Lindsey/Roulet/Romañach 2007: 463).

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<sup>5</sup> Former president Nelson Mandela appointed Judge Kumleben to investigate the South Africa Defense Force's (SADF) in the smuggling of ivory and rhino horn.

<sup>6</sup> Namibia also allows private ownership of wildlife.

<sup>7</sup> Transvaal was one of the four provinces in apartheid South Africa.

<sup>8</sup> A multi-strand nine-foot fence designed to keep wild animals inside the game ranch constituted the minimum standard of adequate enclosure (Reilly 2014).

The commercial trophy hunting industry took off in the 1960s as hunters started to pay to stalk wild animals (Scriven/Eloff 2003: 246). Trophy hunting has become a major income generator on game ranches including rhino reserves. However, the limits of the common law position (*res nullius*) remained unsatisfactory to the private sector. The South African Law Commission further cemented proprietary rights through the recommendation of the Game Theft Act 105 of 1991 (Glazewski 2000: 428). Upon enactment, the law further protected the landowner's rights of ownership of game in cases where game escapes or is lured away from the landowner's "sufficiently enclosed" land (Glazewski 2000: *ibid*).<sup>9</sup>

The rhino takes center stage in the privatization drive of wildlife in South Africa. The number of white rhinos in the Hluhluwe-iMfolozi Park in KwaZulu–Natal had been reduced to about 50 to 70 animals in the early 20<sup>th</sup> century and had gone locally extinct elsewhere in South Africa. Through successful breeding and conservation programmes within the park, white rhino numbers had increased by the 1960s. Rhino numbers started exceeding the carrying capacity of the park and there were fears that any outbreak of disease could revoke the recovery of the white rhino. It was at this point that the Natal Parks Board<sup>10</sup> commenced "Operation Rhino", which over the course of the 1960s and early 1970s saw more than 1200 white rhinos relocated from the iMfolozi Game Reserve to the Kruger National Park, private game reserves, as well as zoos and safari parks abroad. The Natal Parks Board had envisaged that the provision of white rhinos at low cost to private landowners would render them effective custodians of rhinos. The first white rhinos were sold to private landowners at highly subsidized prices in 1963. Nowadays, the total size of South African private rhino reserves stretches over an area of about two million hectares incorporating about 380 separate properties, similar in size to the Kruger National Park. By December 2014, 27 % (or about 5000 animals) of the national population of white rhinos and 20% (or 450 animals) black rhinos were protected on private land in South Africa.

The vested interest of the private sector in rhino conservation is clear from the above. Not only are rhino owners and industry professionals knowledgeable when it comes to rhino conservation, they also know the tricks of the trade. While the sector is not criminal per se,

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<sup>9</sup> The privatization of wildlife has to be read in conjunction with the loss of land and hunting rights of local communities during colonial and apartheid times. While a discussion of the creation of national parks is beyond the remit of this paper, suffice to mention here that such parks were seen as colonial implants, which favoured wild animals over indigenous people.

<sup>10</sup> The former province of Natal is known as KwaZulu–Natal since the end of apartheid, and its parks authority is known as Ezemvelo KZN Wildlife, the former Natal Parks Board.

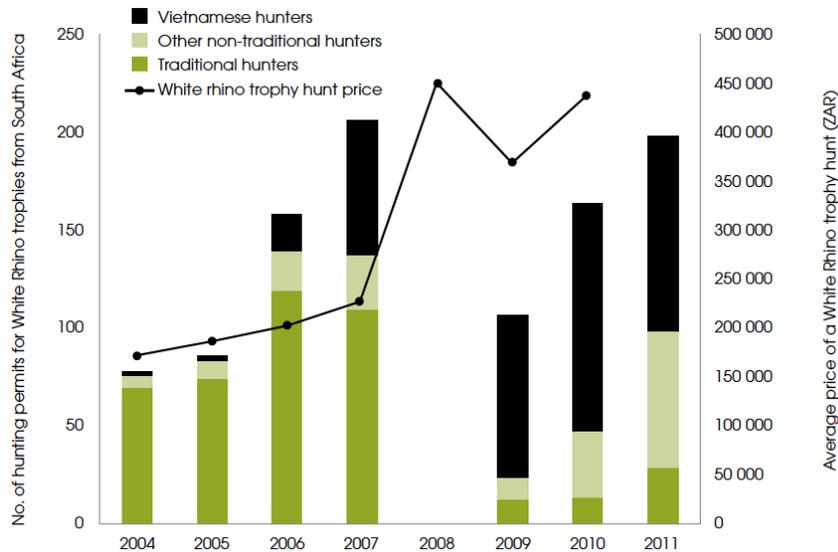
certain elements (such as Groenewald and gang) legitimize illegal activities by fronting how the private sector has contributed to rhino range expansion and growth of rhino numbers. It needs to be pointed out that private rhino owners form part of the economic elite (the white farming community was one of the power bases of the apartheid state).

## **2. The Groenewald criminal scheme**

Pseudo-hunting, illegal hunting of rhinos on private land, rhino horn laundering and gray traffic were the primary mode of rhino horn 'production' until rhino poaching took off in national and provincial parks, as well as in private game reserves in South Africa in the late 2000s. Essentially gray traffic paved the way and laid the transport routes for the high volumes of rhino horn leaving southern African shores for Asian markets nowadays. Groenewald and his ilk had access to wide ranging social and professional networks that facilitated illegal and gray transnational trade with Asian partners. The displacement of gray traffic is partially explained by tougher conservation regulations (discussed in the next section), as well as the private sector 'out pricing' itself. Essentially, it became cheaper and more efficient to pay local hunters to poach rhinos in protected areas than to orchestrate pseudo-hunts (see Graph 1) or pay market-related prices for rhino horn deriving from private sources. Some of those early poachers became rhino poaching kingpins with their own hunting teams and trade connections. The sudden decrease in the price of rhino hunts from 2009 onwards (Graph 1) is explained by regulatory interventions aimed at disrupting pseudo-hunts and gray or illegal activities on private land.

While the sector remained under-regulated, law-abiding rhino breeders saw no problem in selling rhino horn or hunts to fellow farmers such as Groenewald. However, once the law became clear about what was legitimate and what was not, those sub-legal/gray channels started to dry up. Although pseudo-hunts carried the semblance of legality, operators had to shoulder high costs, including the cost of the hunt, transport and security premiums (e.g. bribes to conservation officials). Bribes are still paid to agents of the states; criminal actors save however on the high costs linked to the 'pseudo-hunting' of rhinos.

**Graph 1. Nationality of hunters applying for white rhino hunts juxtaposed against average price of hunting trophy between 2004 and 2011**



**Source:** Graph extracted from Milliken and Shaw (Milliken/Shaw 2012: 53); data compiled by Michael Knight (No hunting permit data was available for 2008)

### 3. The policy and regulatory loopholes facilitating the criminal scheme of the Groenewald Gang<sup>11</sup>

The United Nations Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides the international regulatory framework for international trade in endangered plant and animal species. South Africa ratified the Convention on 15 July 1975. All rhino species were placed in Appendix I in 1977, effectively banning international trade except under exceptional circumstances (Milliken/Shaw 2012: 44). In recognition of South Africa’s success with rhino conservation and management, the populations of white rhino in South Africa were moved to Appendix II in 1994. An annotation confined the permissible trade to live rhinos to “acceptable and appropriate destinations and hunting trophies only” (CITES 1994). While CITES deals with international trade and trade bans, individual states have to domesticate CITES

<sup>11</sup> Elements of this section rely on analysis contained in Chapter 6 of Annette’s dissertation, entitled “Riding on the edge of legality: Interfaces between legality and illegality”.

stipulations at the local level, and regulate domestic trade of endangered species. Domestic trade of rhino horn was permissible in South Africa until 2009 and presented the greatest regulatory loophole, which criminal actors including the Groenewald gang were readily abusing. In the following, some of Groenewald's misdemeanors will be discussed. He and his co-accused will face 1736 counts of racketeering, money laundering, fraud, intimidation and illegal hunting, as well as dealing in rhino horn once the court case resumes next year (2016). The US and SA indictments provide meticulous accounts of the gang's modus operandi.

The US indictment of Dawie Groenewald charges that the alleged rhino horn trafficker sold illegal rhino hunts to American hunters at gun and hunting shows. The owner of *Out of Africa Adventurous Safaris* and his US-based brother Janneman Groenewald claimed that specific rhinos had to be hunted because they presented a "problem" (The Grand Jury for the Middle District of Alabama 2014: 8–14). These rhinos were hunted without the required hunting permits. In lieu of returning home with a hunting trophy, the American hunters posed with the dead rhinos for photo and video opportunities. Groenewald sold the rhino horns obtained from these hunts to criminal networks (The Grand Jury for the Middle District of Alabama 2014: 8), thus profiting from both: the illegal hunts to legitimate trophy hunters and the subsequent illegal sale of rhino horns to criminal actors.

Groenewald hunted numerous rhinos illegally on his farm Prachtig and procured live rhinos and rhino horns from other rhino farmers and the South African National Parks authority (SANParks) (Jooste 2012). In fact, the list of rhino and rhino horn suppliers and ancillary service providers (game capturers, transporters, hunters, butchers, etc.) reads like a list of the "who's who in the wildlife industry of South Africa" – including the names of the world's greatest rhino breeder John Hume, Marthinus Phillipus Steyl linked to the Laotian Xaysavang network (for details see: Goga/Goredema/Salcedo-Albarán 2016) and the KNP as supplier of live rhinos to Groenewald (compare with: National Prosecuting Authority 2011).

In terms of NEMBA (the National Environmental Management of Biodiversity Act is discussed below), separate permit applications have to be tendered to dehorn a rhino, to transport rhino horns, as well as to possess rhino horn. According to Colonel Jooste's affidavit (Jooste 2012: 14), the Groenewald gang flouted these rules on numerous occasions. The carcasses of rhinos that were illegally hunted, killed and dehorned on

Prachtig were either sold to a local butcher, (39 carcasses were sold to a local butcher between 2008 and 2010), buried or burnt (Jooste 2012: 11).

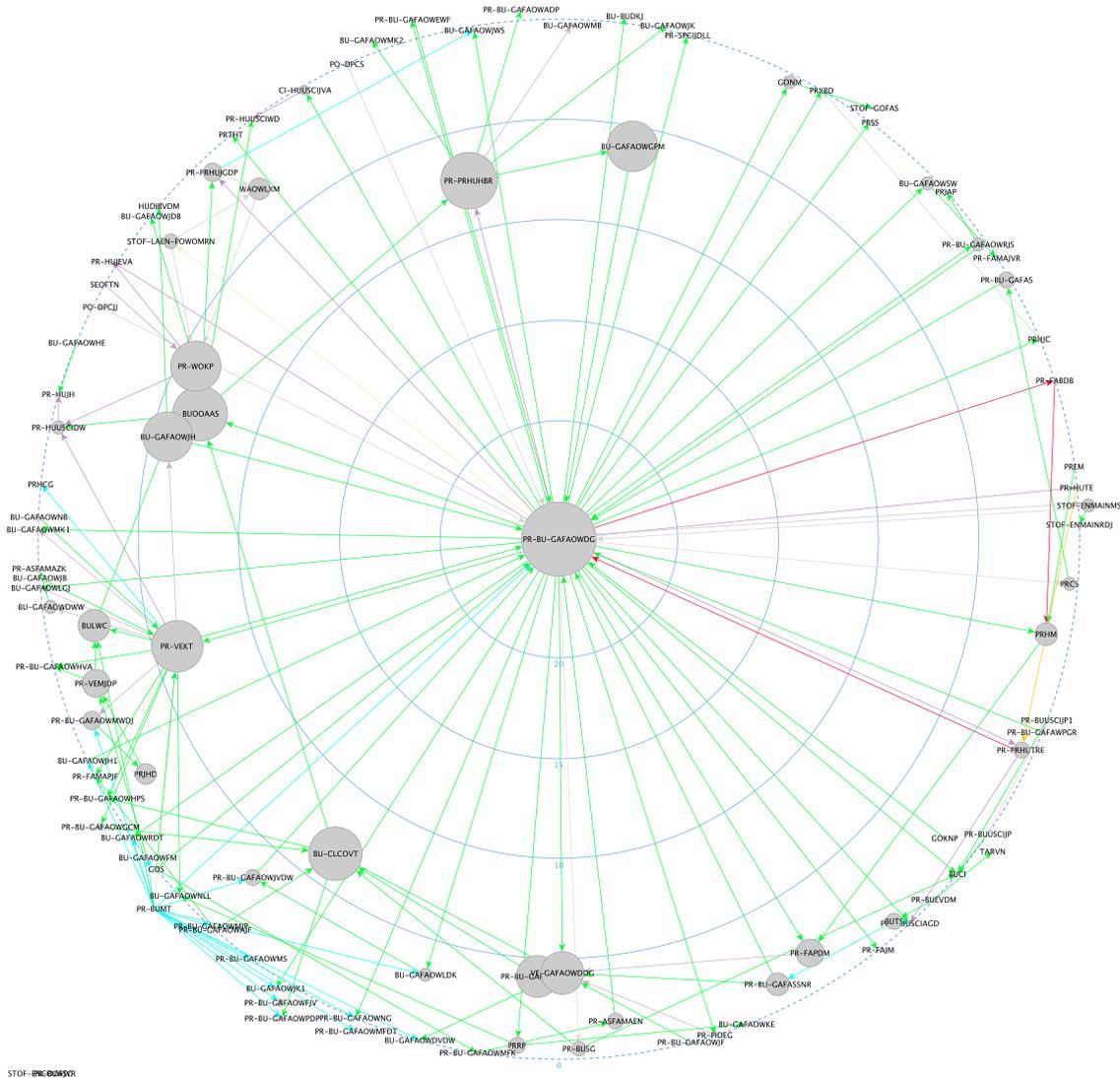
A rather innovative practice involved the re-sale or trade exchange of dehorned rhinos. For example, John Hume accepted 14 dehorned rhinos in respect of debt owed to him (Jooste 2012: 76-77). Groenewald's veterinarian would dehorn the rhinos before the live but dehorned animals were sold to fellow rhino breeders. Nardus Rossouw (referred to as PR-PRHUHBR in Graph 2 below) plays a central role as hunted rhinos and sourced additional rhinos for hunts or dehorning on Groenewald's behalf.

Several hundred rhinos were illegally dehorned and the horns were laundered into legal or gray supply chains – the role of the wildlife veterinarian Karel Toet is important here – he was in charge of the translocation and dehorning of rhinos. Groenewald and Toet did not only dehorn rhinos on Groenewald's farm Prachtig but offered the service to fellow rhino owners across South Africa. The central role of Karel Toet (depicted as PR-VEKT below) is clear in Figure 7 of Salcedo-Albaran's model (compare with: Salcedo-Albaran/Goga/Goredema 2016: 16) while his wife Mariza (depicted as PR-BUMT below) applied and falsified permits for translocations and dehorning of rhinos (e.g. using the same micro-chip numbers again).<sup>12</sup> Mariza Toet's role should not be underestimated, as she was responsible for multiple fraudulent permit applications. These ranged from applications for rhino translocations that never occurred through to applications for translocations of rhinos without separate permits for 'missing' rhino horns. In some instances, Groenewald and his colleagues failed to notify nature conservation before moving rhinos to other properties despite being explicitly ordered to do so, thus bypassing inspections that would have identified fraudulent permit applications.

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<sup>12</sup> When a rhino is dehorned, the horn has to be micro-chipped and registered with nature conservation.

Graph 2. Graph on radial distribution of Groenewald gang



Source: (Salcedo-Albaran/Goga/Goredema 2016: 16)

Groenewald was arrested for an illegal leopard hunt and export of the trophy in the US in 2010. While under house arrest in the US, he instructed fellow syndicate member Tielman Erasmus to stage a house breaking on the farm. He suspected that environmental management inspectors would inspect the farm in his absence and find numerous dehorned rhinos but no rhino horns (Jooste 2012: 12). Groenewald’s attempt to cache his illicit activities through staging a house breaking failed, and forms part of the state’s indictment against him and his gang.

From the above, it is clear that Groenewald had multiple contacts within the wildlife industry who were willing to conduct business with him. Many activities crossed the fine line between legality and illegality. To some business partners, trading rhino or rhino horns with Groenewald at the domestic level appeared to be legitimate. Moreover, the privatization of rhinos and the entitlement to do 'as you please with your own property' allowed many criminal and gray activities to go undetected for several years. The complicity of wildlife professionals such as wildlife veterinarians, helicopter pilots, professional hunters and others facilitated the gang's activities.

South Africa enacted the National Environmental Management of Biodiversity Act (NEMBA) in 2004 and the Threatened of Protected Species regulations (TOPS) were promulgated in 2008. The TOPS regulations list prohibited activities involving listed species, and regulate hunting and compulsory registration requirements. The regulations govern every specter relating to rhinos and their body parts, such as requirements authorizing the possession of rhinoceros horn (Department of Environmental Affairs 2013: TOPS Regulation 31), additional requirements authorizing the possession of rhino horn (Department of Environmental Affairs 2013: TOPS Regulation 32), regulations concerning the hunting of black or white rhinoceros (Department of Environmental Affairs 2013: TOPS regulation 81) and regulations relating to the selling of live black or live white rhinoceros (Department of Environmental Affairs 2013: TOPS regulation 82).

The TOPS regulations were not only aimed at bringing the South African norms and standards in tune with the requirements set out by CITES but also to close loopholes that had been previously exploited. The regulations were initially promulgated in 2008; however, due to the phenomenon of pseudo-hunting and the identification of additional loopholes, the regulations were amended and updated in 2013. Moreover, the former Minister of Environmental Affairs and Tourism Mr Marthinus van Schalkwyk declared a national moratorium on the sale of individual rhino horns in 2009 (Department of Environmental Affairs and Tourism 2009).

The implementation and enforcement of the law and regulations have been riddled with problems, ranging from capacity constraints within the nature conservation bureaucracy through to practical issues linked to the geography of South Africa and locations of rhino reserves, which are spread across the country.

Needless to point out that prior to and after the promulgation of the TOPS regulations, wildlife professionals abused and continue to defy the system. While the old hunting regulations were in place, there was much room to play. For example, hunting outfitters would use the same hunting permit for several hunts. The regulations also only allowed one rhino hunt per hunter per year. To bypass this regulation, hunters would 'province hop'. As the permit system was not centrally administered, provincial conservation authorities had no knowledge whether hunters had conducted hunts in one of the other eight provinces.

The privatization of rhinos also allowed private sector operators free reign over what happened to 'their property'. The common parlance is "what happens behind my game fence is my business". Groenewald and other rhino farmers argue that it is their legal right to render their property profitable. According to them, rhino conservation and protection is expensive especially in light of the rising costs associated with anti-poaching measures. Nature conservation officials are still unclear as to the exact size of private rhino horn stockpiles. A commonly held belief is that there are several other 'Groenewalds' who continue to supply rhino horn from the private reserves to Asian networks.

#### **4. How enforcement agencies and policy makers are confronting criminal networks**

When unnatural rhino deaths flared up in South Africa in the late 2000s, law enforcement attention was channeled to addressing poaching in national parks and private game reserves.

The previous section discussed the promulgation of the TOPS regulations and the national moratorium regarding the domestic trade of rhino horn. While these legislative and regulatory measures are steps in the right direction, they fail to address the transnational and organized crime aspects. The Groenewald trial is set to continue next year. In the interim, the kingpin and his gang are out on bail. It is worrying that influential players such as Groenewald get bail (Hugo Ras' bail applications have been unsuccessful to date), possibly allowing them to influence or intimidate state witnesses and 'clean up' illegal business enterprises.

Essentially, 'legal' but gray wildlife players use their legal rhino operations as a cover and legitimization mechanism for illegal and gray activities. From a policy perspective, the law on the books and the regulations are far-reaching and comprehensive. In fact, wildlife

industry players tend to portray the rules as too stringent and hampering business operations. Based on the widespread fraud in the industry and the attitude of “what happens behind my game fence is my business”, the regulations address regulatory gaps. A nation-wide census of rhino numbers and rhino stockpiles might assist in further restricting illegal and gray activities. However, such censuses are costly and rely on the cooperation and honesty of wildlife farmers. Periodic surveys have never achieved more than a 30% participation rate. It is noteworthy that some environmental NGO activists have suggested the cancellation of private rhino ownership as a radical measure to clean up the industry (a rhino custodianship programme is suggested instead).

As per the previous section, nature conservation officials and wildlife industry players have struggled to keep up with the new reporting and permit system. Wildlife industry players blame corrupt officials within the structures for several rhino horn thefts and poaching incidents on private land after in situ visits from nature conservation officials. Such incidents are used as an excuse not to follow the rules. Perhaps the most important regulatory aspects revolve around a central administration point, as well as a central computerized database. The Department of Environmental Affairs in Pretoria has become the central permitting agency when it comes to restricted activities involving threatened or endangered species (such as rhino trophy hunts). Once the central database is fully functional and the responsible staff has been trained on how to insert data, rogue wildlife professionals are likely to find fewer loopholes.

While South African law enforcement achieved great success by arresting Groenewald, Ras and Lemthongthai, investigations and arrests stop at the border. With the exception of the conviction of Lemthongthai and a few rhino horn couriers, no arrests have been made that disrupt the supply chain between the African bush and Asian market. The Asian network bosses continue with impunity. Transnational organized crime networks are notoriously difficult to disrupt. It is absolutely essential for law enforcement agencies in range, transit and consumer countries to collaborate. While South African and other African law enforcement agencies (e.g. Namibia) have brought criminals to book, there have been no arrests in consumer countries. Beyond rhino horn interdictions (see for details: Goga/Goredema/Salcedo-Albarán 2016) in Asian countries, most notably in Hong Kong, criminal networks continue to transport and distribute rhino horn. The recommendation is to treat rhino horn as a transnational organized crime where criminal investigations should extend beyond political borders.

## Conclusion

The model of Salcedo–Albaran and others provides a fascinating depiction of how it is possible for criminal networks to go about their criminal business by capitalizing on legal and regulatory loopholes. While many fellow wildlife industry players thought they were acting within the ambit of the law, Groenewald and his gang were fully aware of the regulations and how to bypass them. Although it was illegal to hunt and dehorn rhinos without the required paperwork, the gang managed to sell their criminal business as legitimate business enterprises.

It is particularly surprising that Groenewald conducted business with agents of the state (he bought rhinos from the KNP), even after the Directorate for Priority Crime Investigations (DPCI) had commenced with *Project Cruiser*, an investigation into his fraudulent and criminal operations. Regulators have tightened the rules over the past ten years. Despite regulation and enforcement, little headway has been made in disrupting transnational supply chains.

International influencers are pleading for an additional wildlife crimes protocol to the United Nations Convention against Transnational Organized Crime (UNTOC). It is unclear at this point whether such a Protocol will become reality and actionable before the last rhinos are gone. It would be advisable for national organised crime units in range, transfer and consumer markets to collaborate under the umbrella of regional wildlife enforcements networks (WENs) or through INTERPOL. Rhino poaching and horn traffic are likely to continue until the transporters, distributors and traders are brought to book.

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