

# New guide for Philippine investigators chasing the financial footprints of wildlife traffickers



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Investigating and convicting hardened wildlife criminals has always been a challenge, but now wildlife law enforcers and prosecutors in the Philippines have a new tool in their arsenal: financial investigations.

TRAFFIC and AML Consulting PH have developed the “Financial Investigations and Anti-Money Laundering Guidelines to Tackle Wildlife and Environmental Crime in the Philippines”.





## 2 TERMS & DEFINITIONS



### 1. AML Anti-Money Laundering

#### 2. Anti-Money Laundering Act of 2001, as amended (AMLA)

Also known as Republic Act No. 8799 (as amended), is the law which controls money laundering, terrorist and proliferation financing in the Philippines. It was signed into law on 24 September 2001 and took effect on 11 October 2001.

#### 3. Anti-Money Laundering Council (AMLC) refers to the financial intelligence unit created by virtue of the AMLA

#### 4. CFI / CTF Countering or Financing of Terrorism / Countering Terrorism Financing

### 5. Client

refers to any person or entity that keeps an account or otherwise transacts business with a Financial Partner and included the following:

- Any person or entity on whose behalf an account is maintained, or a transaction is conducted, as well as the beneficiary of said transactions;
- Beneficiary of a trust, an investment fund or a pension fund;
- A company or person whose assets are managed by an asset manager;
- A grantor of a trust; and
- Any insurance policyholder, whether actual or prospective.

### 6. CFI Countering or Financing of Terrorism

### 7. Covered Person, natural or juridical

- Persons or entities regulated by the Bangko Sentral ng Pilipinas (BSP) such as banks, money service businesses (money exchange dealers, money changers, remittance and remittance companies), pawnshops, and other financial institutions;
- Persons or entities regulated by the Insurance Commission (IC), which includes insurance companies and general insurance;
- Persons or entities regulated by the Securities and Exchange Commission (SEC) which provide financial products and services, such as securities dealers, brokers, investment houses, and those dealing in securities commodities or financial derivatives;
- Securities dealers or securities issuers and others;
- Games, whether land-based and/or based on internet-based;
- Real estate developers and brokers; and
- Offshore gaming operators and their service providers, regulated by the Philippine Amusement and Gaming Corporation (PAGCOR), Casino Operators, Game Authority (GAMA), Casino Facility Licensing, Game and Hospitality Authority (GPHSA), or any government agency.

### 8. Covered Person or Anti-Money Laundering

The key provisions promulgated a series of amendments to the AMLA to result in:



### Create the AMLC

- Creation of the Anti-Money Laundering Council (AMLC) as the Philippine Financial Intelligence Unit (PFU).

### Coordinates ML

- Coordination of money laundering by identifying the elements of the offense as well as the specific punishable acts and providing for the corresponding penalties.

### Imposes compliance requirements

- Imposition of compliance requirements to Covered Persons, such as:
  - Proper identification, verification, and risk profiling of clients, formerly known as "Know Your Client" (KYC);
  - Customer Due Diligence (CDD) measures;
  - Reporting transactions that exceed or trigger thresholds, known as "Reportable Transactions Reporting" (RT);
  - Retention or substantiation of records with a period of five (5) years from transaction date, known as the "record-keeping" obligation.

### 9. Covered Person or Anti-Money Laundering

## 6 GLOBAL EXAMPLES AND BEST PRACTICE



The following examples are being best practice to consider in putting financial investigations activities to the greatest efficiency from leading authorities as these incorporate a wealth of knowledge for financial investigations



**Anti-Money Laundering: A Practical Guide** This guide is a practical guide for combating money laundering, covering the identification, assessment, and reporting of money laundering risks. It provides a comprehensive overview of the FATF Recommendations and the FATF Glossary of Terms, as well as a detailed explanation of the FATF Recommendations and the FATF Glossary of Terms.



**The Money Trail: How to Follow the Money Trail** This book provides a detailed explanation of the FATF Recommendations and the FATF Glossary of Terms, as well as a detailed explanation of the FATF Recommendations and the FATF Glossary of Terms.



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### 10. Covered Person or Anti-Money Laundering



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### key findings



This comprehensive tool provides a summary of the Philippine Anti-money Laundering (AML) legal framework and practical guidance on basic financial investigations, evidence gathering and case development.



Wildlife crimes are motivated by money, and most involve transactions with indelible records in financial systems. Financial investigation can be used to provide intelligence and evidence of criminality and support confiscation of assets.

However, limited understanding of anti-money laundering regulations and possible pathways of leveraging financial investigation to complement standard law enforcement pose challenges.

*We know that financial investigations can seem daunting. The guide provides a clear starting point and walks investigators and prosecutors through the process"*

*Ben Brock, co-author and TRAFFIC Senior Wildlife Crime Analyst*

“We hope that this guide motivates investigators to apply follow-the-money approaches.”

The threat posed by environmental crimes was assessed by the Philippine National Money Laundering and Terrorist Financing Risk Assessment as “high risk”, with the number of environmental cases compounded by the amount of criminal proceeds and the absence of money laundering investigation.

Violations of the *Forestry Code R.A. 7161*, *Mining Act R.A. 7942*, *Wildlife Resources Act R.A. 9147*, *National Caves Act R.A. 9072*, and *Fisheries Code R.A. 8440* were added to the list of predicate offenses for money laundering in 2013. To date, there has not been a successful money-laundering conviction in the Philippines for crimes predicated on breaking wildlife laws yet.

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**TRAFFIC** AML CONSULTING PH

**NEW RESOURCE TOOL:**  
Financial Investigations and Anti-Money Laundering Guidelines to Tackle Wildlife and Environmental Crime in the Philippines  
21 July 2025 via Zoom

**SUBJECT MATTER EXPERTS**





**Atty. Rainer Dela Fuente, CPA**  
Lead author  
CEO/Founder, AML Consulting PH  
AMLC-accredited trainer  
Former Financial Investigator, AMLC



**Ben Brock**  
Co-author  
Senior Wildlife Crime Analyst, TRAFFIC  
Former Financial Intelligence Officer, UKFIU  
Former Inspector at National Crime Agency

*Financial investigation techniques have been successfully used by law enforcement for many other crimes and is therefore a great opportunity to apply to environmental crimes too”*

*Atty. Rainer P. Dela Fuente, lead author and CEO/Founder of AML Consulting PH*

Following the money is more effective to pinpoint the masterminds behind serious wildlife trafficking compared to following commodities, which typically only leads to lower-level actors in the criminal networks. High-value wildlife crime is often organized and transnational, threatening transborder and national security, so using financial investigations to disrupt these networks is an important tool to have.

*This topic has long been a top capacity building priority for us. We warmly welcome this resource; it will cause a ripple effect in our department and beyond”*

*Atty. KC Panopio-Lofranco, Chief of the Litigation and Prosecution Division, Department of Environment and Natural Resources*

To complement use of the guide, on 21 July 2025, TRAFFIC and AML Consulting PH ran a webinar for over 150 law enforcers and prosecutors from 10 government agencies, to introduce the guide and field questions from participants.



The guide builds on the [Financial Investigations Training from last July 2024](#) organized by TRAFFIC together with the Philippines' Financial Intelligence Unit, the Anti-Money Laundering Council, and AML Research Centre Asia Pacific.

## **for more information:**

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