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Madagascar: a landmark conviction for money laundering linked to environmental crime

How international cooperation and the follow-the-money approach revealed a transnational criminal network trafficking endangered species and led to Madagascar's first money laundering conviction related to wildlife trafficking.

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Some of the seized animals. Photo: [Studio Sifaka / khaosodenglish](#) (used with permission).

Key points

- In 2024, Thai authorities carried out the country's largest ever single wildlife seizure, intercepting 48 lemurs and more than 1,000 tortoises endemic to Madagascar.
- The seizure triggered a joint Thai-Malagasy investigation that traced smuggling routes through Indonesia, uncovered a transnational criminal network and led to arrests in both countries, the freezing of bank accounts and the confiscation of vehicles and vessels.
- In 2025, the Anti-Corruption Court in Antananarivo convicted 10 individuals for trafficking in protected species, money laundering and criminal conspiracy. Sentences of up to 10 years in prison were handed down, alongside approximately USD 8.7 million in customs penalties and damages. This is the first time Madagascar has applied the offence of money laundering to a wildlife trafficking case.
- Training on financial investigations by the Basel Institute on Governance, together with the facilitation of information exchange and peer learning among enforcement practitioners, contributed to this landmark result. The Malagasy authorities are now better equipped to overcome structural challenges in applying a "follow-the-money" approach to organised environmental crime, including limited technical expertise, insufficient resources and the complexity of cross-border financial investigations.

Legal background

In Madagascar, the main legal framework for combating money laundering and terrorist financing is [Law No. 2018-043 of 13 February 2019](#). This law established the mechanisms for prevention, detection and prosecution, as well as the role of the financial intelligence unit SAMIFIN. It was later amended and supplemented by [Law No. 2023-026 of 1 February 2024](#) to strengthen anti-money laundering and counter financing of terrorism (AML/CFT) measures and better align national legislation with international standards, particularly those of the Financial Action Task Force (FATF). However, the concept of a standalone money laundering offence – i.e. prosecuting money laundering separately from the predicate offence – remains difficult to apply compared to other countries.

A national first — so what was the situation before?

The [2025 report by the TRAFFIC](#) analysing legal proceedings related to illegal wildlife trade in Madagascar between 2021 and 2023 indicates that financial investigations were not employed in the cases examined. It appears that none of the investigations looked specifically at potential corruption or money laundering associated with wildlife trafficking. Statistics from the specialised Anti-Corruption Courts (*Pôles Anti-Corruptions*, PACs) do not mention any convictions for money laundering linked to environmental offences in the 2023 report available on their [website](#). The PACs are specialised judicial instances responsible for investigating, prosecuting and adjudicating complex corruption, money laundering and related financial crime.

The case

1. Seizure in Thailand

In May 2024, Thai authorities, including the Department of Special Investigations and the Natural Resources and Environmental Crime Suppression Division of the Royal Thai Police, [intercepted](#) a convoy of four vehicles in Chumphon province in Thailand.

Acting on intelligence from the Wildlife Justice Commission, they seized 48 lemurs and more than 1,000 tortoises endemic to Madagascar. The seized species are protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The Thai authorities described this as the [largest single wildlife seizure](#) ever carried out in the country.

The operation was supported by international partners including UNODC, the US Fish and Wildlife Service, the Wildlife Justice Commission and [INTERPOL](#).

2. International trafficking network

Among other things, the operation led to a joint investigation by the Thai and Malagasy authorities. The investigations revealed that the protected species had been illegally captured in Madagascar and [transported mainly by sea](#) to Thailand via Indonesia.

The activity falls within the scope of transnational organised crime. Authorities identified a structured network involving local poachers, international traffickers, logisticians, intermediaries and sponsors. The investigations led to arrests in both countries ([seven suspects](#) in Thailand and [four in Madagascar](#) initially), the freezing of bank accounts of two suspects and the seizure of vehicles and vessels.

Endemic species such as radiated tortoises, spider tortoises and lemurs are [highly sought after](#) in the exotic pet market, especially in Asia.

3. Financial investigation and international cooperation

Close cooperation between Thai and Malagasy authorities enabled the exchange of information, evidence and operational data, facilitating the identification of trafficking networks and their financial structures. Meetings were held in Madagascar with the support of UNODC, including in August 2024 when a delegation from the Thai judicial authorities met with the Ministry of Environment and Sustainable Development and representatives of the Malagasy judicial authorities.

The Basel Institute on Governance through its Green Corruption team in Madagascar provided technical assistance on financial investigations. It supported the Malagasy authorities in developing financial analyses and facilitated information exchange between the relevant jurisdictions, including Indonesia.

The financial investigations concluded that the suspects possessed unexplained wealth, with the amounts actually found in the individual accounts exceeding the sources of income declared by the account holders.

4. Repatriation of the seized animals

Effective international cooperation led to the successful return of a significant number of the seized tortoises and lemurs to Madagascar in December 2024. The repatriation is in itself an important milestone in countering transnational illegal wildlife trade.

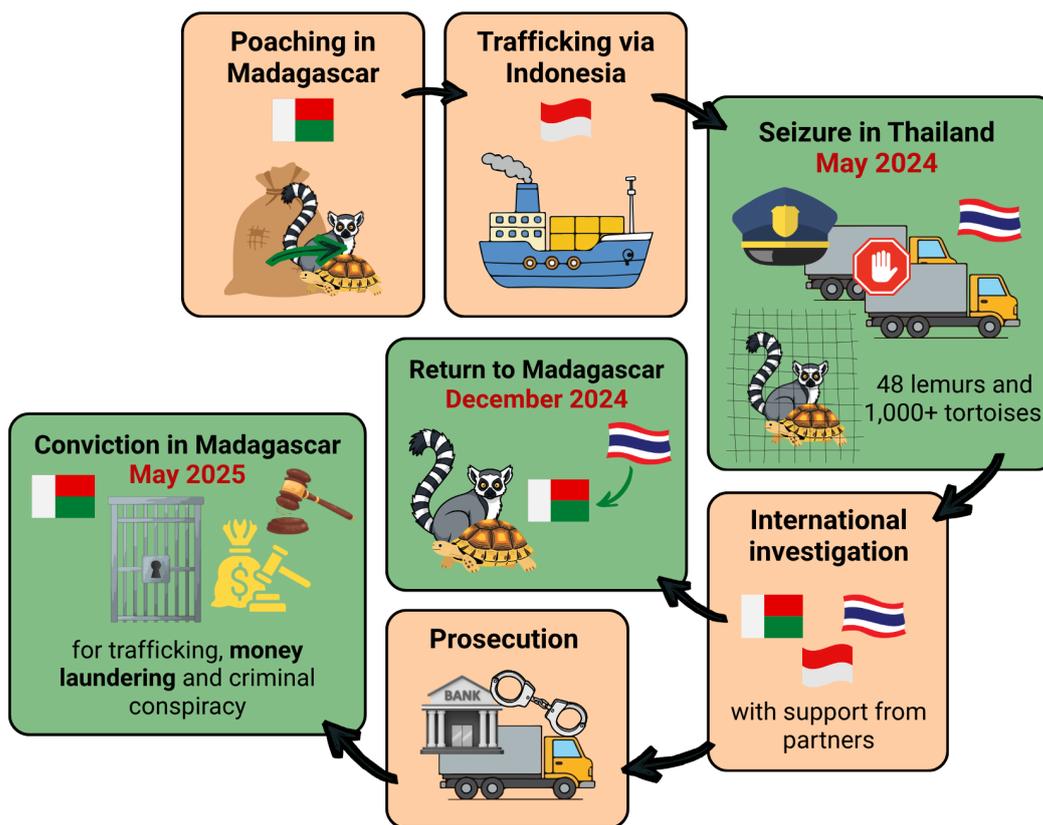
5. Follow-the-money approach and historic conviction in Madagascar

In Madagascar, the case resulted in a landmark conviction. One year after the seizure of the animals in Thailand, on 8 May 2025, the Anti-Corruption Court in Antananarivo convicted 10 individuals for trafficking in protected species, money laundering and criminal conspiracy.¹ The defendants received prison sentences of up to 10 years, were fined approximately USD 5.8 million in customs penalties and ordered to pay around USD 2.9 million in damages to the Ministry of Environment and Sustainable Development, jointly and severally.

Following the judgment, Madagascar's Illicit Asset Recovery Agency (ARAI) confiscated four cars and seven vessels. The amount of money confiscated was negligible compared to the fines and damages. International arrest warrants were issued against three Thai and Burmese individuals charged in absentia.

This is the first time a Malagasy Anti-Corruption Court has applied the offence of money laundering to a wildlife trafficking case. The successful conviction sets an important precedent for a follow-the-money approach to combating environmental crime.

¹ Judgment No. 113-Co/25 dated 8 May 2025.



Simplified diagram of the tortoise and lemur trafficking case between Madagascar and Thailand.

What can we learn from this case?

The value of financial investigations in environmental cases

This case represents a national first for Madagascar’s Anti-Corruption Courts, marking a shift from simple *in flagrante delicto* procedures towards comprehensive investigations capable of identifying criminal networks and tracing illicit financial flows.

Integrating financial investigations into environmental crime cases, as demonstrated in this case, is a strategic approach that plays a key role in combating criminal networks.

Making full use of existing laws

The enforcement of existing laws contributed to this significant progress. This illegal wildlife trade case was brought before an Anti-Corruption Court in accordance with Law No. 2016-021 that established the specialised judicial anti-corruption units. Furthermore, the court applied the existing legal framework guiding the fight against money laundering and terrorist financing (see box, above).

While legal reforms are sometimes necessary to support law enforcement action against environmental and financial crime, it is equally important to make full use of existing laws.

Inter-agency and international cooperation are vital

In cross-border cases, effective cooperation at national and international levels is crucial. In this case, various Malagasy authorities worked together in the investigations, including the Ministry of Environment and Sustainable Development, the financial intelligence unit and Malagasy customs authorities.

However, the local authorities would not have been able to conduct the investigations alone, given that criminal networks and illicit financial flows do not respect national borders. They relied on close international cooperation, including through mutual legal assistance, with counterparts in Thailand and Indonesia.

Financial investigations are challenging but necessary

Looking into the financial side of environmental crime and targeting criminal assets can help deter criminal activity and disrupt criminal networks. Why? Money is often the primary incentive for engaging in such crimes in the first place.

The Senior Investigating Judge in charge of the pre-trial investigation stated:

“Financial investigations, including “following the money”, are crucial in proving the validity of money laundering charges and tracing the “path” of the money, thereby leading to its confiscation. Unfortunately, the transnational nature of these crimes and the existence of new methods of money transfer (cryptocurrency, etc.), especially in the case of environmental crimes, make these investigations difficult to conduct.”

Prosecuting money laundering is challenging and depends heavily on the quality of financial intelligence available to the prosecutors in charge of the case.

Training can help overcome constraints

Despite the success of this case, integrated investigations in Madagascar remain constrained by limited technical expertise and insufficient resources. These constraints continue to undermine the effectiveness of judicial action against organised environmental crime.

The Senior Investigating Judge added:

“In terms of procedure, it is very difficult to conduct effective investigations within the time constraints imposed by preventive detention. On the technical side, there is a need to bring actors up to the same level of competence. From an operational point of view, there is a lack of time and material resources.”

Ongoing training in financial analysis and intelligence gathering can help strengthen investigators' capacity, equipping them with the skills, tools and networks required to fight money laundering activities, including those associated with environmental crimes.

How training and peer learning can trigger sustainable change

The Basel Institute on Governance, through its Green Corruption programme, contributed to this case primarily by helping to strengthen financial investigation capacities and facilitating information exchange. Technical assistance was funded through the Illegal Wildlife Trade (IWT) Challenge Fund as part of the project [“Building a follow-the-money network to target environmental crime syndicates”](#). From 2023 to March 2026, the Basel Institute supported authorities in Madagascar in enhancing the skills of all relevant enforcement actors to trace funds in relation to illegal wildlife trade cases.

Technical assistance included specialised training – including on the use of practical analytical tools – case mentoring and facilitating Malagasy participation in a global network of enforcement practitioners. The ultimate aim is to enable Malagasy authorities to pursue financial investigations and recover assets in domestic and transnational cases independently in the future.

Keywords

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Thailand

Environmental crime

Illegal wildlife trade

Lemurs and tortoises

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Financial investigations

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