



TRAFFIC



RED FLAG INDICATORS

FOR WILDLIFE AND TIMBER TRAFFICKING IN CONTAINERIZED SEA CARGO

A COMPENDIUM AND GUIDANCE FOR THE MARITIME SHIPPING SECTOR

About WWF

WWF is one of the world's largest and most experienced independent conservation organizations, with over 5 million supporters and a global network active in more than 100 countries. WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by: conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

About TRAFFIC

TRAFFIC is a leading non-governmental organisation working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development, whose mission is to ensure that trade in wild plants and animals is not a threat to the conservation of nature. More information at www.traffic.org.

About Asia Pacific Counter-IWT Hub (AP Counter-IWT Hub)

Created in 2019, the Asia Pacific Counter-IWT Hub (IWT Hub) complements and builds synergies among existing WWF programs that are taking action to combat IWT. Based in Hong Kong, a global finance and transport hub, the IWT Hub partners with government authorities, e-commerce and finance houses, shipping and airline industries, and other like-minded NGOs to disrupt IWT routes and stop the illegal trade by tackling financial crimes underpinning IWT and making the transport of illegal wildlife more difficult and costly.

The IWT Hub conceptualized and facilitated a groundbreaking partnership with the Association of Certified Anti-Money Laundering Specialists (ACAMS) to forge innovative alliances to draw collective expertise and resources to create strong awareness and drive strong and measurable change in the response to Illicit Wildlife Trade. ACAMS is the largest international membership organization dedicated to enhancing the expertise of financial crime prevention professionals. Together with TRAFFIC, the Hub is also working with some of the largest shipping companies in the world in developing systems responses to pro-actively respond to suspicious IWT cargos.

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  APM Terminals Port Salalah Oman



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FOREWORD

Statistics tell us the illegal wildlife trade enables the poaching of an elephant every 30 minutes, an African rhino for its horn every eight hours, that one in five fish is caught illegally, and in certain countries, particularly in Africa and South America, 50-90% of timber is harvested and traded illegally.

These devastating statistics are driven by lucrative illicit profits. We often see value projections of the illegal wildlife trade around US\$20 billion per year, but according to World Bank reports, when you also include illegal logging and fishing, this can jump to a staggering US\$1-2 trillion.

More than 90 percent of these losses are from ecosystem services that forests, wildlife and coastal resources provide, that are not currently priced by the market, such as carbon storage, biodiversity, water filtration, and flood retention.

Unfortunately, the trafficking of wildlife only continues to grow, threatening the survival of these species while exposing humanity to the rising threat of zoonotic disease pandemics through the uncontrolled movement of wild animals and products.

We know traffickers use existing transport infrastructure to move their illicit goods throughout the world and have developed sophisticated networks to facilitate this movement by exploiting weaknesses and loopholes and by facilitating corruption on a massive scale. Maritime supply chains are very complex but through our cross-sector collaborations within United for Wildlife (UfW), we are working with partners across the globe to disrupt these networks and address this threat.

Due diligence by shippers is vital to ensure business legitimacy and strengthen the integrity of logistics supply chains in order to lock out traffickers and stop illegal wildlife shipments.

Educating shipping staff, management and public sector agencies to the tactics and methods of the traffickers and equipping them with the right tools to fight the trade is a key strategy in this fight and the Red Flag Compendium for Wildlife and Timber Trafficking in Containerised Cargo is an excellent tool to help fill this gap.

This collection of maritime focused red flags will help to share the crucial lessons learned from the sector and make those available to all, and in doing so, creating new effective barriers through the deployment of these tools that will help in the fight to break the chains of the illegal wildlife trade.



A handwritten signature in blue ink, which appears to read 'Lord Hague'.

Lord William Hague

Chair of United for Wildlife

DEFINITIONS IN THE CONTEXT OF THIS REPORT

BILL OF LADING (B/L)

The legal document required in the shipment process issued by a carrier giving details and instructions relating to the shipment of a consignment of goods. Typically, it will show the names of the shipper and consignee, the point of origin of the consignment, its destination, and route.

CONTAINER FREIGHT STATION (CFS)

Is an off-dock facility located near the servicing ports. CFSs are used for the consolidation of cargo and stuffing in containers before the goods are shipped. This process reduces congestion at the port of origin. CFSs can be privately owned.

CONSIGNEE

The recipient of the goods being shipped. In a contract of carriage, the consignee is the entity that is financially responsible (the buyer) for the receipt of a shipment.

INLAND CONTAINER DEPOT (ICD)

Container handling and storage facility situated at inland points away from seaports. ICDs help importers and exporters to handle their shipments near their location.

MANIFEST

The collection of all bills of lading of which the goods are loaded on one specific vessel and destined for one specific port, signed by the captain.

MARITIME SHIPPING SECTOR

Transport and logistics operators along maritime supply chains such as shipping lines, shipping agents, national industry associations, freight forwarders and other actors linked to containerized sea cargo shipping.

RED FLAGS

Describes various indicators and warning signals, which may be explicit or implicit, suggesting that something is not ‘quite right’ and may require further investigation.

SHIPMENT

Cargo transported under the terms of a single bill of lading, irrespective of the quantity or number of containers/packages

SHIPPER

The owner of the commodities shipped, also referred to as the “consignor,” is a person, business, or entity that tenders or “consigns” the product to the carrier.

TIMBER

Wood prepared in some way for human use.

VGM

The Verified Gross Mass is the weight of the cargo, including dunnage and bracing, plus the tare weight of the container carrying this cargo. SOLAS (the International Convention for the Safety of Life at Sea) requires the shipper to provide VGM in a “shipping document,” either as part of the shipping instruction or in a separate communication, before vessel loading.

WILDLIFE

Wild animals and plants, live or parts and products derived from them.

WILDLIFE TRADE

The commerce in wildlife. This includes timber and fisheries trade and is inclusive of both local/domestic and international commerce.

WILDLIFE TRAFFICKING

Acts committed contrary to national and international laws and regulations intended to protect wildlife (animals and plants) and to administer their management and use. It includes illicit activities associated with both harvesting and trade.

ACRONYMS

ASEAN: Association of Southeast Asian Nations

B/L: Bill of Lading

CCP: Container Control Programme

CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora

COD: Change of Destination

DRC: Democratic Republic of Congo

EU: European Union

Hong Kong SAR: Hong Kong Special Administrative Region of the People's Republic of China

ICD: Inland Container Depot

IWT: Illegal Wildlife Trade

Lao PDR: Lao People's Democratic Republic

MA: Management Authority

SA: Scientific Authority

SOP: Standard Operating Procedure

POL: Port of Loading

POD: Port of Discharge

SOP: Standard Operating Procedure

Switch B/L: Switch Bill of Lading

TCM: Traditional Chinese Medicine

UNODC: United Nations Office on Drugs and Crime

UAE: United Arab Emirates

U.S.: United States of America

WCO: World Customs Organization

ABOUT THIS COMPENDIUM

This compendium aims to capture the most common red flags indicators for illegal wildlife trade (IWT) happening through containerized sea cargo. It aims to guide and assist the maritime shipping sector¹ in detecting possible non-compliance and IWT-related activities in their supply chains. It also provides recommendations and links to existing tools and best practices to help companies prevent further exploitation from traffickers.

The information presented here is based on a review of existing publicly available literature (see reference list), seizure data from TRAFFIC's Wildlife Information Trade System and input from partners and collaborators. These documents highlighted the most recent and most

common modus operandi, smuggling routes and typologies up to December 2020. The range of wildlife products discussed under section 2.3 of this report is a non-exhaustive list of wildlife products and illegally traded derivatives via containerized cargo; the selection was made based on data availability.

It is important to note that red flags associated with IWT may vary according to the nature of the trafficked wildlife goods and their associated geographies of movement. These patterns are dynamic and evolve with time as traffickers adapt their modus operandi to avoid detection; thus, the shipping sector needs to review and update red flags regularly. For example,

the United for Wildlife Transport and Finance Taskforces' monthly alerts offer an excellent tool to keep abreast of emerging and evolving trafficking trends, including red flags (See section 3.5 of this document). Similarly, some of the resources and web links cited in this report may become outdated over time, and therefore users should always check if more up-to-date information exists.

¹ Transport and logistics operators along maritime supply chains, such as shipping lines, shipping agents, national industry associations, freight forwarders, and other actors linked to containerized sea cargo shipping.



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WILDLIFE AND TIMBER TRAFFICKING IN CONTAINERIZED CARGO

Typical legitimate commodities used for concealment:

- Recycled plastic
- Timber and wood products
- Nuts
- Metal scraps
- Cocoa
- Coffee
- Tea leaves
- Beans
- Shells
- Salt
- Frozen meat
- Dried fish
- Fish maw
- Skin

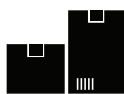
Common smuggled wildlife products

- Elephant ivory
- Rhino horns
- Pangolin scales /meat
- Timber
- Shark fins
- Sea cucumbers
- Seahorses
- Seashells
- Donkey skins
- Bones and claws of big cats
- Giant clams and other seashells
- Dried plants (e.g. Aloe vera, American ginseng)

More details please refer to p23



RED FLAG INDICATORS



Shipment of commodities incongruous with origin and or destination country



Weight and appearance discrepancy



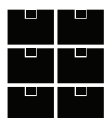
Dubious or vague descriptions



Value of cargo does not tally with description or size



Questionable paperwork



Consignment split across multiple shipments



Shipping route is abnormal for the product and destination



Change of shipping route once the ship has left port



Switch Bill of Lading



Request for use of Letter of Indemnity (LoI) without just cause



Use of Free Trade Zones and Free Ports



Failure to disclose true shipper or consignee information



First-time shippers and shipper's reluctance to offer information about their business and the end-use of a product



Last minute request for shipment clearance



Cash-payments

More details please refer to p18

INTRODUCTION

1.1 THE ILLEGAL WILDLIFE TRADE

Wildlife trade is a very diverse global business encompassing many different sectors: from forest and fisheries products to wild meat, live plants and animals, and products, such as skins and herbal medicines. The trade follows complicated supply patterns (wild and farmed) to local and international trade and markets for food, furniture, medicine, pets, and decorations. Much of the trade is legal and supports local livelihoods and the global economy to some extent. The protection status of wild animals and plants and the conditions under which trade is permitted differ from country to country. Some countries may choose to limit the volume of trade or ban the trade of a particular species or an entire group entirely. At the international level, the main treaty governing wildlife trade is the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The growing demand for wildlife products, predominantly currently driven by consumers from East and Southeast Asian countries, is fuelling a parallel illegal market. Criminals take advantage of the substantial legitimate wildlife trade to co-mingle licit and illicit proceeds, creating challenges for detecting illicit activity (FATF, 2020). Valued between 7-23 billion USD/year (UNEP, 2016), it is considered the fourth largest illegal trade after firearms, drugs, and human trafficking². Presently, the IWT is a low-risk and high-profit business often run by well-organized transnational criminal groups. These international crime syndicates are primarily behind the transport of wildlife and timber contraband through containerized shipping.

There is evidence of convergence between IWT and other forms of serious crime (FATF, 2020), including money laundering, financial crime and corruption. At times, traffickers also engage in drugs, arms, counterfeits, and human trafficking.

No country is untouched by this serious crime, which negatively impacts biodiversity, human health, national security and socio-economic development, and lines the pockets of organized criminal groups (UNODC, 2020). IWT also does not undergo hygiene, sanitary, and phytosanitary controls and therefore, can potentially contribute to the spread of zoonotic diseases, such as the SARS-CoV-2 virus that caused the COVID-19 pandemic that started in early 2020.

² <https://www.unodc.org/unodc/en/corruption/wildlife-and-forest-crime.html>

1.2 THE ROLE OF THE TRANSPORT SECTOR

Wildlife traffickers rely on land, air and sea transport networks to move illegal commodities across borders, oceans, and often continents. Legitimate transport service providers, including freight forwarders, airlines, and shipping companies, may be utilized by these criminals and exposed to the risks of inadvertently being a link within illegal wildlife trade chains (see Table 1).

Table 1:

Risks to the transport sector from wildlife trafficking	
Reputational risk	Companies might be exposed to reputational risks by media and other public reports for wittingly or unwittingly being involved in transporting contraband carried or due to be carried. They could be criticized for inaction and lack of due diligence particularly when operating in countries that are well known to export illicit products through corrupt practices.
Legal risk	Companies in the transport sector have been prosecuted for not making enough effort to ensure that shipments do not contain contraband. Many national laws also allow for the seizure of vehicles (including ships) used to transport illegal cargo.
Economic risk	Reputational and legal risks can lead to economic risk. Cargo customers may avoid any transport provider whose services may be delayed through increased checks and enforcement attention. Seized containers are often held by Customs authorities as evidence for long periods of time as cases are investigated and prosecuted and thus incur losses to companies through inactivity. Companies found to transport illegal goods may have their insurance policies and fees reassessed or coverage denied and may be barred by countries such as the U.S. from operating in their key market ports.
Health and safety risks	It is estimated that 60% of emerging infectious diseases come from animals (i.e., zoonoses), and approximately 72% of those come from wildlife. Ebola, SARS and now COVID-19 (SARS CoV-2) are all believed to be associated with diseases originated from wild animals. The transport of live wild animals and meat, especially when smuggled to evade conservation controls, and therefore also veterinary and hygiene controls, carry the potential risk of diseases spreading to staff and other transport operators, and to the broader public at final destinations. Aside from the risks associated with disease, wildlife trafficking can also bring personnel in contact with poisonous and dangerous animals.
Security risk	IWT along with other forms of illegal trade provide a source of revenue for organized crime. Criminals may exploit weaknesses in the supply chain to their advantage.

1.2.1 IWT IN CONTAINER SHIPPING

Travel distance, location, quantity of goods, and the type of product live, derivatives, parts and products all have a significant influence on the transport networks wildlife traffickers will choose in international trade.

For contraband shipped via sea container, the process generally starts with an overland journey to reach exit ports, before it is shipped to overseas markets. The wildlife contraband typically smuggled in shipping container by sea typically comprises of timber or dead animals or animal parts. In contrast, most live wildlife is transported by air, express couriers, local boats for short trips, and vehicles overland – quicker journey times being likely to result in higher survival rates.

Container shipping is the dominant method used for smuggling of large quantities of wildlife products such as elephant ivory, pangolin scales and timber, due to cost-effectiveness, ability to ship large volumes and heavy weight, a low likelihood of detection, all facilitated by the presence of corrupt officials and private sector operators along the trade chains.

Between 2009 and 2013, sea cargo constituted approximately 73% of all large scale (>500kg) ivory seizures; this has likely either remained constant or even increased in more recent years (C4ADS, Species of Crime, 2015). In 2019 alone, there were ten major seizures of pangolin scales trafficked from Africa to Asia through containerized sea cargo involving over 90 tonnes of scales. In half of these seizures, elephant ivory was also found in the same shipment (15.5 tonnes).

In October 2019, China Customs confiscated 23 tonnes of pangolin scales smuggled in containers from Nigeria via South Korea. The scales, estimated to have come from tens of thousands of pangolins, were mixed with ginger slices in bags, making them harder to detect during routine checks by officials (Anon a, 2020).

Over the past four years Nigeria has emerged as a critical source and transit country for illegal wildlife shipments. Similarly, Viet Nam has emerged as a hotspot destination country for shipments of ivory and pangolin scales; including the largest ever ivory seizure on record (over nine tonnes) which took place in March 2019 at the Tien Sa port in Danang. The domestic market in Viet Nam for both commodities appears limited, suggesting a stockpiling role for later distribution to China. The ability to transport such large volumes of wildlife contraband at a single time is indicative of greater sophistication and collusion that typically involves the use of organized covert channels for the illicit procurement and movement of wildlife contraband, greater levels of finance, and higher levels of collusion and corruption between government officials and transport sector operators such as clearing agents, and freight forwarders to exploit trading links and networks between source countries and end-use markets (CITES, 2019).



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1.3 SUPPLY CHAIN WEAKNESSES AND CORRUPTION

While Customs agencies' capacity to detect and intercept illegal shipments is improving, wildlife traffickers continue to seek ways to exploit the weakest and most corrupted systems. Examples of tactics used by criminals to evade controls and obfuscate cargo origin include use of switched Bills of Lading (B/L), forged Certificates of Origin, undeclared port stops, and undeclared switching of cargo between vessels at sea.

There is evidence that traffickers may operate with the complicity of port or Inland Container Depot (ICD) employees. For example, by accessing sealed and or bonded containers at night to insert wildlife contraband into shipments of declared legal goods along with using fraudulent clearing paperwork indicating that a container has been scanned or cleared when it has not. Tampering with CITES permits and other documents is also used to obscure the true nature of the shipment.

Tracking illegal wildlife products along the complexity of supply chains is, therefore, a challenging endeavour, and effective targeting of trafficking routes and chokepoints

by both law enforcement and the private sector is critical. Additionally, shipping documents contain useful information that may help detect possible fraud and inform next steps to reduce business risks (see Annex I).

All parties in the international maritime supply chain have a responsibility to ensure that transactions comply with the numerous export, transit, and trans-shipment requirements. Due diligence on clients and shipments is conducted thoroughly, particularly in IWT high-risk countries.



TRAFFICKING TACTICS AND VULNERABILITIES IN A SIMPLIFIED OVERSEAS SUPPLY CHAIN*

Warehouse (container packing)

- Loading and placing of container seals is carried out not always in presence of Customs authorities
- Possible intrusions to warehouses and depots, and access to sealed containers, to insert wildlife and timber contraband into legitimate shipments



B

A



Manufacturer/ Shipper/Exporter

- Use of fraudulent paperwork such as forged certificates and permits; Misdeclaration of commodities to be shipped
- Use of fake addresses and 'shell' companies to hide true identity of consignor and/or consignee; last minute requests for change of destination address

Inland Container Deposit

Possible intrusions to warehouses and depots, and access to sealed containers to insert wildlife and timber contraband into legitimate shipments



D

C



Transporter/ Freight Forwarder

- Weak due diligence and risk assessment on shipper, consignee and shipment
- Limited knowledge on IWT redflags

Container Terminal Operator

Possible intrusions and access to sealed containers, to insert wildlife and timber contraband into legitimate shipments



F

E



Port Customs

- Container inspections for export are given lower priorities than incoming shipments due to revenue collection
- Risk profiling for IWT matters is still weak in many countries
- Bill of lading is received by customs too late for effective targeted container risk assessment; In many countries container profiling is still performed manually.

Container Terminal Operator

Possible intrusions and access to sealed containers, to remove contraband from legitimate shipments



H

I



Port Customs

- Risk profiling for IWT matters is still weak in many countries
- Bill of lading is received by customs too late for effective targeted container risk assessment; In many countries container profiling is still performed manually.

Transporter/ Freight Forwarder

- Weak due diligence and risk assessment on shipper, consignee and shipment
- Limited knowledge on IWT redflags



J

K



Warehouse (container packing)

Possible intrusions to warehouses and depots, to remove contraband from containers.

Consignee/ Importer

Use of fake addresses and 'shell' companies to hide true identity of consignor and/or consignee; last minute requests for change of destination address



L

*Corrupted practices could happen at each step of the chain



1.3.1 CORRUPTION IN THE PUBLIC AND PRIVATE SECTOR

Corruption can occur at any level of the supply chain and involves many different actors.

A common practice in IWT is corruption in the form of bribes. Corruption is a critical enabler of IWT, taking place at sourcing, transit, and export stages and involving public and private sector abuse of power and trust. It can be ad hoc, involving smaller amounts of money and lower-level officials, or systemic, involving more significant amounts of money, higher-level officers, and generally pre-planned (OECD, 2018). For example, in Madagascar, officials at one checkpoint did not confiscate banned ebony and rosewood but allegedly systematically extorted a toll for each log from the transporters (Ratsimbazafy et al., 2016). Countries with high levels of corruption³ are also known to be key players in the export, transit and import of illegal wildlife shipments, such as Nigeria, the Democratic Republic of Congo (DRC), Kenya, Cambodia and Viet Nam.

Government officials, including CITES Management Authorities, can make wildlife contraband look legal with a single piece of documentation, leading to cases of abuse involving corrupt practices. Paperwork needed to move illegal wildlife products can be forged or changed, and genuine documents can be bought from corrupt officials. The transport sector is particularly vulnerable, with seaports and airports being used to facilitate IWT. Organized criminal networks are often effective through collusion, corruption, and protection that covertly link private sector operatives with public sector regulators and law enforcers (Zain, 2020).

Wildlife trafficking networks regularly attempt to exploit relationships with a small number of complicit or unscrupulous transport company employees to facilitate the smuggling of wildlife products. Specific tactics used by corrupted employees include:

1. Facilitating the placement of contraband into shipping containers.
2. Assisting illegal shipments to pass through security or customs screening without proper, or any, inspection.
3. Helping falsify or alter shipping or transaction documentation.
4. Helping make intentional mis-declarations on shipping documentation.
5. Obtaining and using fraudulent or stolen container seals.
6. Sharing passwords or otherwise providing other access to transport computer systems.
7. Manipulating electronic shipping records in ways favourable to traffickers.
8. Altering the VGM weight of a shipment to hide any discrepancies after a container is repacked with contraband.

(UfW, 2018)

³ <https://www.transparency.org/en/cpi/2019/results/chn>

1.4 THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

Established in 1973, CITES is a legally binding agreement between governments signatories voluntarily enter into. As of December 2020, 183 countries were party to the Convention. This agreement aims to ensure that the international trade in wildlife does not threaten the existence of a species. CITES regulates the international trade in approximately 38,000 species of plants and animals (box 2). Trade in specimens of species listed under the three CITES Appendices requires the issuance of official trade documentation in the form of permits or certificates.

- **Appendix I:** Includes species that are at risk of extinction from international trade, such as all the eight pangolin species and African elephant (except for elephant populations of Botswana, Namibia, South Africa and Zimbabwe, which are included in Appendix II).
- **Appendix II:** Includes species that may become threatened with extinction if trade is not controlled (e.g., lions and timber species such as *Pericopsis elata* also known as Ramin) as well as so-called “look-alike” species where trade regulation is necessary to ensure that trade in Appendix I and Appendix II species that are threatened is effective and enforceable.
- **Appendix III:** This includes species protected in at least one country which has asked other CITES member states for help in controlling the trade.

CITES Annotations are a note attached to certain species in the Appendices to indicate which population, parts or derivatives are concerned by the listing or clarifying its scope, or containing special conditions relating to the inclusion of the species. This is usually indicated by a hashtag (#) and a number next to the species name in the Appendices (see Annex II and <https://cites.org/eng/app/appendices.php>).

1.4.1 TYPES OF CITES DOCUMENTS

All import, export, re-export and introduction from the sea of specimens of species covered by the Convention have to be authorized through a system of permits and certificates. Each CITES Party designates one or more CITES Management Authorities (MAs)⁴ in charge of administering that licensing system and one or more Scientific Authorities (SAs) to advise them on the effects of trade on the status of the species.

PERMITS

According to the CITES definitions and Resolution Conf. 12.3 (Rev. CoP18), a permit is an official document issued by a CITES MA to authorize the export of a specimen of a species included in Appendix I or II, the export of a specimen of a species included in Appendix III from the State that included the species therein, or the import of a specimen of a species included in Appendix I. To be valid, a permit must conform to the requirements of the Convention and the Resolutions of the Conference of the Parties. For example:

An **export permit** may be issued only if the specimen was legally obtained; the trade will not be detrimental to the survival of the species; and, for Appendix-I listed species, an import permit has already been issued.

For specimens from species listed in Appendix I, an **import permit** is issued by the Management Authority of the importing Party. This should be issued only if the specimen is not to be used for primarily commercial purposes and if the import will be for purposes that are not detrimental to the survival of the species.

Box 2:

HOW DO I FIND OUT IF A SPECIES IS LISTED UNDER CITES?

Information about CITES listed species and the listing date of each species under the Convention is available on the CITES Checklist <https://checklist.cites.org/#/en>

A CITES document is required each time a specimen of a CITES-listed species crosses an international border. Note that separate permits are not required for transit, if the specimens remain under the control of the customs authorities⁵.

CERTIFICATES

A **certificate** is also an official document issued by a Management Authority and used to authorize different types of trade in CITES specimens, the most important of which are:

- Re-export certificate
- Pre-Convention certificate
- Certificates of origin
- Certificate of captive-breeding or artificial propagation
- Certificate of introduction from the sea

More information on CITES permits and certificates can be found at: https://cites.org/eng/prog/Permit_system

NOTIFICATIONS

The CITES Secretariat issues Notifications to the Parties that contain information and reports on the implementation of the Convention. Notifications are used to officially communicate information on lost or stolen permits or security stamps, details on Parties' stricter domestic measures, suspension of permits, and forthcoming meetings, among other examples.

List of CITES Notifications can be consulted here: <https://www.cites.org/eng/notif/index.php>

⁴ List of National CITES Management Authorities: https://www.cites.org/eng/disc/parties/chronolo.php?order=field_country_official_name&sort=asc on the CITES website

⁵ See paragraph 1 of Art. VII and Res. Conf. 9.7 (Rev. CoP15) on Transit and Transshipment

1.4.2 FORMS OF CITES DOCUMENT ABUSE

International trade in CITES-listed wildlife without the appropriate permits and certificates appears to be the most commonly detected transnational violation of the Convention. These illicit activities sometimes involve organized crime groups and serious wildlife offences (UNODC, 2020). Abuse of CITES permits and certificates affects a wide range of species and can take place across the entire trade chain. Here are some of the most common examples:

- **Intentional declaration of false information on documents:** In this case applicants intentionally mis-declare information by providing false information (regarding species, quantity, source, value). This can reduce the chance of the shipment attracting attention, reduce the amount of tax paid, or falsely bring the shipment into compliance with export quotas.
- **Documents modified after issue:** Information is altered to allow trade that has not been authorised.
- **Counterfeit documents:** Fake permits, sometimes of very high quality, are used fraudulently to trade specimens.
- **Re-using or photocopying documents:** The same permit is used multiple times or duplicated.
- **Expired documents:** Permits are used beyond the date of expiry.
- **Stolen documents:** Stolen permits can be used to trade CITES-listed wildlife, and/or permits may be declared as lost, damaged, or stolen, and the replacements used to trade wildlife.

Example 1: The CITES MA of Cambodia confirmed that it had not issued any **CITES export permits for Siamese Rosewood (*Dalbergia cochinchinensis*)** (CITES Appendix II) since its listing in 2013, and Notification No. 2017/023 states that any permits are therefore counterfeit. Viet Nam, however, reported importing sawn D. cochinchinensis wood and timber from Cambodia each year between 2013 and 2015 totalling over 8,200m³ (CITES 2019), all of which presumably took place using counterfeit permits.

Example 2: Exports of rosewood from Madagascar have allegedly been subject to abuse, with reports of photocopied export permits used fraudulently for container shipments. Officials have also been bribed by operators in order to receive permits (Ratsimbazafy et al. 2016).

Example 3: In early 2017, approximately 4,000 export permits to authorise Customs clearance of more than **10,000 containers of Kosso *Pterocarpus erinaceus*** were **reportedly issued retrospectively by the Nigerian CITES MA**, after the containers were detained at the Chinese border (EIA 2017b). At the time they were detained, the species was listed in Appendix III, and the shipment lacked the valid required **CITES certificates of origin**. It was alleged that senior officials in Nigeria were bribed by industry actors to facilitate the “legalization” of the rosewood timber. CITES Resolution 12.3 on Permits and Certificates, recommends that exporting Management Authorities do not issue permits retrospectively, and importing countries do not accept them, as it creates a loophole that allows for illegal trade. Relevant CITES Notification: No. 2018/005

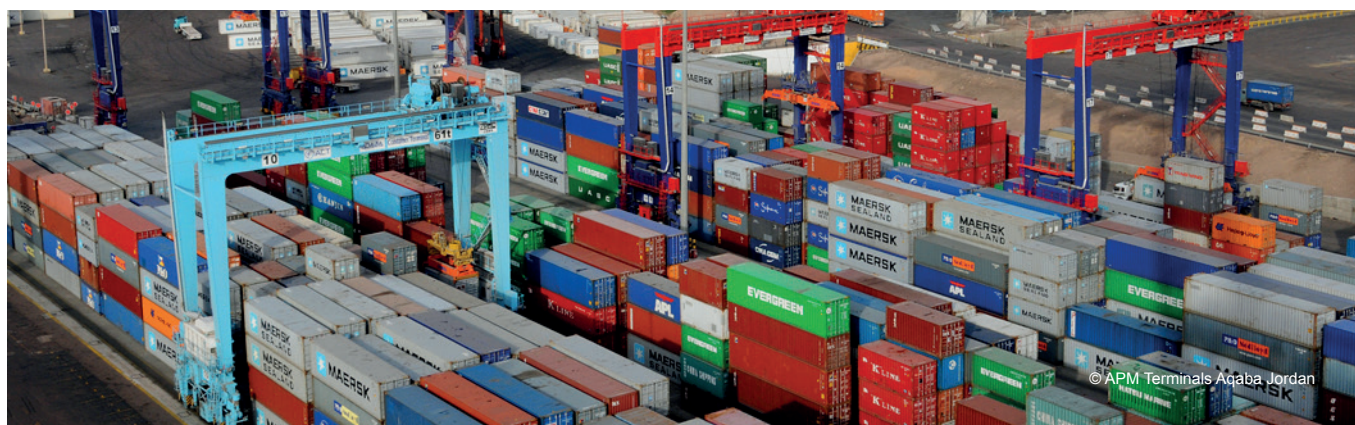
Sections 2.3.1 and 2.3.2 of this compendium are extracts from Outhwaite (2020) unless stated otherwise.

RED FLAG INDICATORS

Transport sector actors are almost never the manufacturers of the commodities transported and are seldom the legal owners of shipments. The sector is primarily reliant on information or documentation supplied by another party in the supply chain and, therefore, it is critical that they exercise vigilance and are aware of possible fraudulent actions to protect their own business against illicit activities.

Red flags are indicators that can be applied to shipping transactions to help identify possible attempts to circumvent controls. Further enquiries will then assist in identifying whether a transaction is legitimate and compliant with national laws and regulations, or if it should be refused and/or referred to an appropriate enforcement or regulatory

authority for further investigation (Sipri, 2016). A red flag indicator demonstrates or suggests the likelihood of the occurrence of suspicious activity. However, it is important to remember that one risk indicator alone, or without additional information about the client or transaction, is not likely to be sufficient to confirm illicit activity (FATF, 2020).



2.1 RED FLAGS INDICATING POSSIBLE ILLICIT TRADE

Many risk indicators for suspicious cargo are common to all forms of contraband, including trafficking of wildlife, and some examples are illustrated below. High-level of corruption in countries and at ports should be considered a major overarching red flag since traffickers would exploit these weaknesses in international trade chains.



Shipment of commodities incongruous with the origin and/or destination country

The commodities being shipped appear to be incompatible with a country's technical capabilities, natural resources, or origin. For example, semiconductor manufacturing equipment is unlikely to be shipped to a country with no electronics industry or timber shipped to a country that is already a major timber producer and exporter.



Weight and appearance discrepancy

The weight information stated in the packing list is illogical and/or anomalous. For example, actual weights that do not correspond to those provided in the bill of lading or seem grossly at odds with a reasonable weight for the declared commodity. Similarly, if the appearance of the shipment does not match its documentation, this should be a concern. For example: in 2018, Guatemala's public prosecutor for environmental crimes ordered the return from China of four shipping containers marked as rubber, recycling, and packing materials. The team noticed certain "anomalies" with the paperwork, including that it had been signed by a known rosewood smuggler and that containers carrying the listed products were far heavier than they should have been (Anon, 2019).



Dubious or vague descriptions

Descriptions of commodities are vague or misleading. For example, commodities are described simply as 'spare parts', 'samples', 'machine tools' or 'electrical goods'. Examples of vague descriptions for wildlife shipments include 'shell', 'horn', and 'rosewood' (there are many species of rosewood, some of which can be traded legally, and others prohibited from international trade).



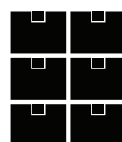
Value of cargo does not tally with description or size

The value of cargo can help triangulate evidence as to whether a proposed cargo to be loaded onto a vessel is stated in the Bills of Lading.



Questionable paperwork

Use of photocopies instead of original documents; spelling mistakes or inconsistencies, such as the permit number or date which does not match; an invoice issued with "# 1"; expired documents; odd formatting or blurry text which may occur when documents are altered; evidence that documents have been tampered, but not officially countersigned; poor quality documents, for example with cut and pasted logos (see also section 2.2 on Abuses of CITES permits).



Consignment split across multiple shipments

This is a tactic used by traffickers to spread the risk of loss in case of interception by law enforcement. It's also used to benefit from smaller volumes that can more easily be hidden within shipments of legitimate commodities. The illegal shipment is spread across multiple containers under one booking or across multiple bookings.



Shipping route is abnormal for the product and destination

A shipment that makes no commercial sense, for example shipments sent via a long slow route involving multiple stops when more direct routes exist; shipments for which the shipping costs are near to / exceed the value of the commodity being shipped; or shipments with no clear market value. For example, low value consignments, such as scrap metal, being shipped across continents.



Change of shipping route once the ship has left port

Change of Destination or diversion of cargo is a legitimate procedure, but it could also be an indicator of illicit activities an attempt to evade controls.



Switch Bill of Lading

A switch B/L refers to when a freight or shipping agent files a new bill of lading for a shipment that is already en route. Used legitimately, the procedure is typically aimed to protect proprietary supply chain information. However, this practice is often abused by traffickers to obfuscate information about the port of loading (origin), port of discharge (destination) and routing of a shipment, to reduce the likelihood that illegal shipments will be flagged for inspection and hinder after-the-fact investigations if the contraband is seized. Switching B/L mid-shipment to support an illegal shipment requires traffickers to cooperate with a complicit freight/shipping agent. According to published reports, complicit freight agents are known to charge a fee based on the size of the illegal shipment they facilitate, with one reportedly charging \$45 per kg of smuggled pangolin scales and \$145 per kg for ivory (UfW, 2017).



Request for use of Letter of Indemnity (LoI) without just cause

The use of a LoI can be legitimate where for instance, the voyage journey is too short to issue B/Ls.

The LoI can request different receivers, consignees and B/L contents and as such presents a risk to ship owners. The issuing of a LoI could be used as a way to evade enforcement agencies by using different receivers at short notice and to change the port of discharge.



Use of Free Trade Zones and Free Ports

The simplified import, export, transit and trans-shipment procedures and lax controls of free trade zones and free ports can mean they are prime sites for the diversion of illicit shipments and commodities to sanctioned countries.



Failure to disclose true shipper or consignee information

Addresses appear to be fictitious, for example, incomplete or overly simplistic addresses (e.g., “1234 Main Street”); consignee names are similar to large well-known companies; the consignee address is incompatible with the businesses associated with the declared commodity; or a freight forwarding company is listed as the recipient for a shipment instead of the consignee.



First-time shippers and shipper's reluctance to offer information about their business and the end-use of a product.

First-time shippers or new customers should be subject to robust screening to confirm that they are who and what they claim to be. Not shell companies created to obfuscate the actual ownership of the cargo (see Section 3.1 on preventative measures).



Last minute request for shipment clearance.

Shipper requests for shipment clearance at the last minute might be an attempt to avoid Customs' controls' due to the time factor.



Cash-payments

There is a willingness to pay a large amount of money in cash when wire transfer or financing are commonly used.

2.2 RED FLAGS IN CITES PERMITS

The smuggling of CITES protected species has become an extremely lucrative trade. For this reason, it is critical to always be on the lookout for indicators of this type of activity, particularly for signs of non-compliance in CITES permits

The Permit needs to be an original and written in one of the three languages of the CITES Convention: English, French or Spanish. The information in the permit should be preferably typed-in. The certificate used here is a sample, every country will have slightly different variations, but with the same information requirements.

LOOK OUT FOR:

- **Non-valid Permits** - e.g. an expired permit; description of the specimens that does not match what is in the shipment..
- **Fake or altered Permits** - the permit has not been issued by a CITES Management Authority or, a legitimate permit has been altered after it was issued; paper or printing is abnormal in appearance (e.g. thickness, texture and/or colour; the permit provided is a photocopy and not an original; presence of ink spots - often indicating that a thinner has been used); stamp, seal or security stamp showing signs of having been copied; and or permit / certificate number has been altered.
- **For transshipments** - check that final destination on both the permit and the shipping documents is the same.



This logo and the full name of the Convention must be present

Only one selection possible.
If "re-export" has been selected, box 12 on the permit must be also completed fully.
If "other:" has been selected, the document type must be indicated in this same box

Each **original** permit is numbered by the country's CITES Management Authority (M.A.).

Export and Re-export permits must be used within 6 months
Import permits or Certificates of Origin should be valid for 12 months (some countries follow stricter rules)

Specimens **must enter** the country of import **before** the expiry date.
The validity of a permit is shown by the period of time between the expiry date (in box #2) and date of issue (in box #13).

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA		PERMIT/CERTIFICATE No.		Original	
3. Importer (name and address) Full name and address (can be a person, persons or a company)		4. Exporter/re-exporter (name, address and country) Full name and address (can be a person, persons or a company). Country name must be written in full.		2. Valid until	
3a. Country of import Full country name		Signature of the applicant			
5. Special conditions This box can be used to justify the omission of certain information or reference to annexes that contain more details (including Phytosanitary Certificate, Certificate of ownership) <i>For live animals, this permit or certificate is only valid if the transport conditions conform to the CITES Guidelines for transport, in the case of air transport, to the IATA Live Animals Regulations</i>		6. Name, address, national seal/stamp and country of Management Authority Full name of the authority and address. Country name must be given in full.			
5a. Purpose of the transaction (see reverse)	5b. Security stamp no.	E.g. live, logs, skins, shoes, bones, shells etc.			
7/8. Scientific name (genus and species) and common name of animal or plant	9. Description of specimens, including identifying marks or numbers (age/sex if live)	10. Appendix no. and source (see reverse)	11. Quantity (including unit)	11a. Total exported/Quota	
7/8.	9.	10.	11.	11a.	
A 12. Country of origin * Permit no. Date To be completed only in the event of re-export		12a. Country of last re-export	Certificate no.	Date	12b. No. of the operation ** or date of acquisition ***
B 12. Country of origin * Permit no. Date		12a. Country of last re-export	Certificate no.	Date	12b. No. of the operation ** or date of acquisition ***
C 12. Country of origin * Permit no. Date		12a. Country of last re-export	Certificate no.	Date	12b. No. of the operation ** or date of acquisition ***
D 12. Country of origin * Permit no. Date		12a. Country of last re-export	Certificate no.	Date	12b. No. of the operation ** or date of acquisition ***
* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export) ** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes *** For pre-Convention specimens					
13. This permit/certificate is issued by: Place & date of issue, written clearly. name of officer, written in full. Place _____ Date _____ Security stamp, signature and official seal _____					
14. Export endorsement:		15. Bill of Lading/Air waybill number: if applicable (i.e. not for land checkpoints).			
Block	Quantity				
A					
B					
C					
D					
Port of export		Date	Signature	Official stamp and title	

CITES PERMIT/CERTIFICATE No.

Permit number at the top and bottom should be the same

NB: Not all countries require that the permit is signed. If there is a place for the signature, this must be present

Must indicate number of specimens or weight in KG (terms like boxes or bags are not acceptable)

If applicable, two figures will appear: 1. the total number of specimens traded since the beginning of the year, including the ones in this shipment and 2. the total quota for the species trade. i.e. 150/1100

Check this link to determine if a quota applies:
https://cites.org/eng/resources/quotas/export_quotas?field_export_quotas_year_value%5Bvalue%5D%5Byear%5D=2019&field_full_name_tid=&field_party_quotas_tid=&items_per_page=50

To be completed only for the re-export of specimens that were previously re-exported

National seal of the country's CITES Management Authority.

If the country uses a security stamp it appears here. The number of the security stamp should appear in box 5.

The security stamp must be cancelled by a seal as well as the signature of the issuing officer (to ensure that the stamp cannot be re-used in a fraudulent manner).

Not all Parties require that box 14 be completed. A permit is not automatically invalid if this box is not completely filled in. If you are not sure - contact your M.A. Inspection must be done for all shipments going to the USA.

The inspecting officer must indicate the actual quantities of specimens being exported or re-exported.

Quantity boxes not used must be crossed out.

*Any shipment which contains more specimens than the number written in box # 11 must be denied entry.

2.3 WILDLIFE SPECIES-SPECIFIC RED FLAGS

Trafficking in wildlife has its own specific typologies, concealment patterns, and emerging trends that can be identified through seizures data and other intelligence reports.

Red flags associated with IWT may vary according to the nature of the trafficked wildlife goods and their associated geographies of movement, as summarized in Table 2. These patterns are dynamic and can evolve with time as traffickers adapt their modus operandi to avoid detection. The shipping sector needs to remain alert and informed of current red flags to keep pace with these shifts.

Wildlife that is illegally traded through containerized sea cargo typically involves large volumes of non-perishable wildlife products, such as ivory, pangolin scales, and timber, except pangolin meat that is smuggled via refrigerated containers between Asian countries. Other illegally traded wildlife found in containerized cargo includes dried animal products, such as shark fins, sea cucumbers, seahorses,

seashells, donkey skins, but also big cat bones and claws, giant clams, occasionally rhino horns as well as dried plants such as aloe, American ginseng and other plant-derived medicinals.

Some of these wildlife products are completely forbidden from international commercial trade (under CITES or specific national bans). Therefore the only way for traffickers to smuggle them is to hide and mis-declare them as other licit commodities; for other wildlife products that can be legally traded, the illegality comes from the lack of provision of proper and necessary permits that will demonstrate compliance with e.g., CITES regulations and established harvest quotas (see Box 3).

Box 3: Ways in which wildlife products are illegally traded via containerized cargo.

1. Mis-declaration. Shipper declares the cargo as another legal product to conceal illegal wildlife. It's not unusual that legal products that have low value or that benefit of reduced duty/taxation are used as a cover-up for illegal wildlife. For example, in April 2015 Thai customs seized 3 tonnes of elephant ivory originated from Kenya; the cargo was declared as "tea leaves", a commodity that benefited of reduced Customs checks (Anon, 2015a).

Illegal wildlife products are typically:

- **Hidden** among other commodities.

Example: In April 2018, Mozambique customs officials found 867 elephant ivory tips hidden in recyclable plastic bottles spread across six sea cargo containers. The shipment, declared as recycled plastic, was destined for markets in Cambodia (Anon, 2018a)

- **Mixed with look-alike species.** This happens when species of the same group are granted with different protection levels and trade requirements. Wildlife products that are either completely banned from trade or that would require special permits, are smuggled along similar species that can be more easily traded, making the job of identification very challenging. Very common in shark fins and timber trade.

2. Use of forged or altered permits and other documents to fraudulently legitimize the trade in species that require specific permits (see also earlier section 1.4.2 Forms of CITES document abuses)

In addition to that, traffickers will try to conceal information about the true shipper, consignee, ownership and business activities related to the shipment in the B/L by providing incomplete or fraudulent shipment documentation. For example, three containers containing over nine tons of illegal ivory, arrived in Manila (Philippines) and Hai Phong (Viet Nam) ports in early 2009, were later found to be associated with a company called Puja Ltd and a P.O. box in Tanzania; investigations revealed the company was not registered under either with the Business Registration and Licensing Agency (BRELA) or the Surface and Marine Transport Regulatory Authority (SUMATRA), a legal requirement for any company shipping freight out of Tanzania (EIA, 2010).

Africa's biodiversity is a major target for wildlife traffickers, and African countries often play a role in the export or transit for wildlife shipments destined to Asia, especially China, Hong Kong SAR, Singapore, Viet Nam, and, at times, South Korea.

Cambodia has emerged as a destination country for large shipments of ivory since 2014, as shown from intermittent seizures. It has risen in prominence as an active illegal market since China's domestic ivory ban entered into force as of 31 December 2017. Africa-based Asian individuals (mostly of Chinese and Vietnamese origin with export/import businesses) are acting as the facilitators or 'middlemen' for these trafficking syndicates. Other biodiversity-rich regions such as Central and South America are also affected by this illicit trade.

Concealment methods in containerized sea cargo tend to be fairly simple and only a small portion of them have been highly sophisticated or ingenious, for example, ivory tusks hidden in hollowed-out timber logs and then sealed in wax; use of refrigerating containers for meat; or creation of a hidden compartments within the container. Some examples are provided in Box 4.

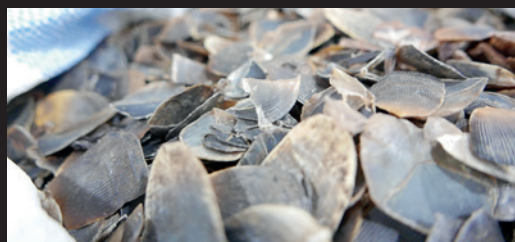
For most animal-derived products, however, the contraband tends to be concealed in sacks or boxes and then hidden under other legal commodities. Plastic, wood products, nuts, metal scraps, and cocoa have all been used to conceal large shipments of ivory or pangolin scales. Fish or other pungent commodities have, at times, been used to cover the signature smell of ivory or pangolin scales in an attempt to disguise the scent from sniffer dogs.

Box 4:

- Hundreds of pieces of ivory and pangolin scales hidden in logs inside three containers were detected by a mobile non-intrusive scanner on the South Sudan / Uganda border in early 2019. The logs were hollowed out filled with the illegal contraband sealed with wax and fitted with concealed lids (Anon, 2019b).

- A West Africa-based ivory trafficking network operating out of Cameroon employed a series of specially modified containers with false compartments installed into the back to hide the contraband. At least three such modified containers were uncovered in 2006 and linked to a used tyre business with a residential address in Yaoundé. Seized paperwork revealed the three containers had travelled at least 12 times along the same Douala - Hong Kong SAR route on which the seizure was made (Anon, 2012).

- In September 2018 Indian Customs seized nine tonnes of Red Sanders logs, a highly valuable variety of sandalwood, at Nhava Sheva seaport, which was being exported to Malaysia, in contravention of export prohibitions. The goods weighing over 18 tonnes had been declared as 648 cartons of "Polyester Yarn". Rice bags were used to compensate the total weight of the declared cargo to avoid suspicion (Anon, 2018b).



Because of its size and volume, illegal timber is generally mixed with other legal timber, mis declared as another timber species, or declared with a broader or generic name that does not distinguish the legality of the specific species.

While criminals are known to adapt their smuggling methods and routes, they will also keep using those which have proved to be successful. Repeated use of the same routes can indicate a well-established network that is facilitated by corruption along the trade chain.

Wildlife traffickers appear to, when necessary, sometimes abandon even large multi-million dollar consignments of illegal wildlife products hidden in shipping containers. This is either due to the traffickers fearing detection if they attempt to collect the container or the result of internal disputes among the criminal players involved in the illegal shipment. Past incidents indicate that abandoned consignments of illegal wildlife products are often accompanied by missing, falsified, or fraudulent shipping documentation (UfW, 2018b).

Organized wildlife crime is often not species-specific and trafficking networks typically switch to trading in other commodities if more profit can be obtained. This trend has been observed with recent shifts in ivory and pangolin scale smuggling in particular.

Table 2. Illustrative summary of known trafficking routes, concealment methods and misdeclarations of commonly trafficked wildlife products encountered in containerized sea cargo in recent years.

Known trafficking routes					Other highlights
PORT OR COUNTRY OF ORIGIN	PORT OR COUNTRY/ TERRITORY OF TRANSIT	PORT OR COUNTRY/ TERRITORY OF DESTINATION	CONCEALMENT METHODS	KNOWN TO HAVE BEEN MIS-DECLARED AS	E.G. HS CODES USED, KEY WORDS
ELEPHANT IVORY					
Benin; Cameroon (Douala port); Democratic Republic of Congo (DRC) (Matadi port); Gabon (Owendo and Port-Gentil); Ivory Coast; Kenya (Mombasa port); Mozambique (Pemba port); Nigeria (Apapa port, Tin Cap port, Rivers port, Onne port); Tanzania (Dar es Salaam, Zanzibar and Tanga ports); Togo (Lome port); Uganda (ICDs).	Kenya (Mombasa port); Malaysia (port Klang; Penang, Paris Gudang, Sepanggar ports); Mozambique; Philippines (Manila port); Republic of Congo (port of Pointe Noire); Singapore; Sri Lanka; South Korea (Busan port); Tanzania (Zanzibar port); Thailand (Laem Chabang port); United Arab Emirates (UAE).	Cambodia (Phnom Penh and Sihanoukville ports); China (port of Tian Jian); Hong Kong; Lao PDR; Malaysia; Viet Nam (Hai Phong; Da Nang, Tien Sa, Cat Lai ports).	Hidden among large quantities of legal product; Hidden inside hollowed-out timber logs and later sealed in wax; Hidden in the middle of the container between timber logs; Hidden inside modified containers' compartments.	Timber / processed wood / plywood / wooden floor tiles / white wood Sunflower seeds/ groundnuts/ peanuts/ cashew nuts/ ginger roots/ red beans / tea leaves / coffee /cocoa/ fruits Scrap plastic / recycled crushed plastic / used plastic / plastic waste / plastic bottles/ polypropylene resin/ rubber/ asphalt/ tar barrel / stone/ ceramic/ cotton wool/ jerrycans of palm oil Dried anchovies / frozen fish / frozen beef / fish maws /dried seaweed/ snail shells donkey skin	Mostly raw ivory tusks or cut into smaller pieces and packed into multiple boxes, bags or sacks; In recent years often smuggled in combination with pangolin scales; Plastic resins (HS code prefix 39); Peanuts or groundnuts (HS code prefix 1202)

Known trafficking routes					Other highlights
PORT OR COUNTRY OF ORIGIN	PORT OR COUNTRY/ TERRITORY OF TRANSIT	PORT OR COUNTRY/ TERRITORY OF DESTINATION	CONCEALMENT METHODS	KNOWN TO HAVE BEEN MIS-DECLARED AS	E.G. HS CODES USED, KEY WORDS
PANGOLIN SCALES					
Burundi (Bujumbura ICDs); Cameroon (Douala port); DRC (Matadi port); Ghana; Indonesia (Bakauheni port); Kenya (Mombasa port) Mozambique (Pemba port); Nigeria (Apapa port ; Rivers port; Onne port); Uganda (ICDs).	Cameroon; China (Shenzhen port) Hong Kong; Indonesia; Lao PDR; Malaysia (port Klang, Nigeria (Apapa port); Republic of Congo (Port of Pointe Noire); Sepanggar port); Singapore; South Korea (Busan port); Togo (Lome) Viet Nam.	Cambodia; China (Shenzen, Shanghai, Guangzhou); Hong Kong; Viet Nam (Tien Sa, Cai Mep, Cat Lai, Nam Hai Dinh Vu, Hai Phong, Da Nang ports).	Hidden among large quantities of legal product; Wrapped with layers of ginger slices in bags.	Moringa seeds / dry herbs / ginger / cassia seeds / cashew nuts/ beans / cocoa Marine products / oyster shell / fish maw Frozen beef / frozen meat Timber / logs / wood Plastic scrap / plastic waste Tar /asphalt / charcoal / quartz General products / broken machines Cotton wool / jerrycans of palm oil	Sometime smuggled in combination with ivory; Often declared as variations of plastics under Customs HS code prefix 39; Use of charcoal (HS code prefix 4402); Indirect shipments are often booked as two separate shipments or through switched B/Ls; Traffickers are known to be able to switch the port of origin to Tema, Ghana on shipments from Nigeria.
PANGOLIN MEAT					
Indonesia; Malaysia.	-	China; Taiwan.	Hidden in refrigerated shipping containers; Hidden with frozen sardines	Frozen fish	-

Known trafficking routes					Other highlights
PORT OR COUNTRY OF ORIGIN	PORT OR COUNTRY/ TERRITORY OF TRANSIT	PORT OR COUNTRY/ TERRITORY OF DESTINATION	CONCEALMENT METHODS	KNOWN TO HAVE BEEN MIS-DECLARED AS	E.G. HS CODES USED, KEY WORDS
PROTECTED TIMBER					
Belize; Cambodia; Cameroon (Kribi and Douala ports); Colombia; DRC; Equatorial Guinea (Malabo and Bata); Gabon (Port Gentil and Owendo); Ghana; Guatemala; Guinea Bissau (Port of Bissau); Honduras; India (Nhava Sheva and Chennai ports); Indonesia; Lao PDR (inland ports); Madagascar; Myanmar; Mozambique (Beira, Nacala, Maputo); Myanmar; Nicaragua; Nigeria; Panama; Papua New Guinea; Peru; Russian Federation; Senegal; Solomon Islands; Tanzania (Dar es Salaam port); Thailand (Bangkok and Laem Chabang ports); The Gambia; Togo; Republic of Congo (Pointe-Noire).	Hong Kong; Lao PDR; Malaysia; Mexico; Mozambique (Beira port); Myanmar; Namibia (Walvis Bay); Singapore; South Africa (Durban); Sri Lanka (Colombo port); Tanzania (Zanzibar); UAE; Viet Nam; The Gambia.	China (Shanghai port, Guangzhou port, Zhangjiagang port, Taicang port); Croatia; Greece; Hong Kong; Italy (Genova, Trieste); United States (U.S.); Netherlands; Viet Nam.	Hidden with other legal timber or non-timber commodities; False CITES and other documentation (e.g., use of certificate of origin issued by non-recognised entities such as timber associations, individuals); No CITES re-export permits; misuse of CITES annotations;	Sawn tropical wood / mixed wood Other species names Rosewood African wood Polyester Yarn / high-grade vanilla (for Malagasy rosewood) Use of reference to 'NON CITES' or 'Pre-CITES convention specimens'	Key words: Cocobolo Bois ordinaire Kosso wood Cuban Mahogany Rosewood Black wood 紅木 ("rosewood") Use of incorrect country of origin (e.g. South Africa, Congo) HS codes 9504; 4409; (logs, lumber) 4403; and veneer HS4408

Known trafficking routes					Other highlights
PORT OR COUNTRY OF ORIGIN	PORT OR COUNTRY/ TERRITORY OF TRANSIT	PORT OR COUNTRY/ TERRITORY OF DESTINATION	CONCEALMENT METHODS	KNOWN TO HAVE BEEN MIS-DECLARED AS	E.G. HS CODES USED, KEY WORDS
SHARK FIN					
Ecuador; Egypt; Ghana; Guinea Bissau; India (Chennai port); Indonesia; Iran (Chabahar port); Kenya; Liberia Panama; Peru; Republic of Congo; Senegal; Sierra Leone; Spain; Sri Lanka; The Gambia; UAE.	EU; Malaysia; Singapore; UAE; U.S..	China; Hong Kong; Singapore; Taiwan; Viet Nam.	Mis declared as other legal commodities; Mixed with legal look-alike species.	Frozen seafood / dried seafood product / Blue fin / blue shark fin /dried marine products / dried ray skins / edible ray skin / fish maw / cucumbers and gherkins	Shark fin is often shipped with other high valued seafood products including fish maw, dried sea cucumber and dried sea horses Key words: Aileron de Requin; requin; Sirip hiu; hiu; Aleta de Tiburon; tiburon; Vi cá map; cá mập; 魚翅 / 鱼翅
SEAHORSES					
Egypt; Guinea; India; Indonesia; Peru; Senegal; South Africa; Thailand; Togo.	Sri Lanka; Belgium; France.	Hong Kong; Viet Nam (Cai Mep port).	Hidden and mis declared as other legal commodities.	Table salt / fish maw / sheep skins	Often found in shipments with dried shark fins, sea cucumbers
SEA CUCUMBERS					
Egypt; India.	Sri Lanka	China; Hong Kong; Viet Nam.	Hidden and mis declared as other legal commodities.	Table salt / dried shark fins / squid bones	Often found in shipments with dried shark fins and seahorses

Known trafficking routes					Other highlights
PORT OR COUNTRY OF ORIGIN	PORT OR COUNTRY/ TERRITORY OF TRANSIT	PORT OR COUNTRY/ TERRITORY OF DESTINATION	CONCEALMENT METHODS	KNOWN TO HAVE BEEN MIS-DECLARED AS	E.G. HS CODES USED, KEY WORDS
BIG CATS PARTS					
Kenya; Mozambique; South Africa; Bolivia; Brasil; Suriname; Peru.	Singapore; Viet Nam; Lao PDR.	China; Viet Nam.	Hidden and mis declared as other legal commodities.	Tea leaves	Found in shipments with other wildlife contraband such as Elephant ivory and rhino horn
RHINO HORN					
Kenya; Malaysia; Mozambique (Pemba, Beira and Nacala ports); Nigeria (Apapa).	Cambodia (Sihanoukville port); Malaysia (Pasir Gudang port); Singapore; Thailand; UAE.	China; Hong Kong; Viet Nam.	Hidden among large quantities of legal product such as in shipments of logs, cut timber, and other wood-based commodities.	Timber/wood Plastic pellets Tea leaves	Secondary product sometime found in association with big shipments of ivory or pangolin scales; More often smuggled by air.
SOUTH AFRICAN ABALONE					
South Africa (Durban and Cape Town ports); Also transported by road or by air from South Africa to the following countries acting as countries of export: Angola, DRC, eSwatini, Mozambique, Namibia, Republic of Congo, Zambia, Zimbabwe.	-	Hong Kong	Hidden and misdeclared as other legal commodities. In frozen form it has been concealed between boxes of other frozen fish	Frozen fish / duvets / plastic bags	-
DONKEY SKINS					
Burkina Faso; Egypt; Ghana; Kenya; Nigeria; Senegal; Tanzania.	Hong Kong; Sri Lanka.	China; Hong Kong; Viet Nam.	Hidden and misdeclared as other legal commodities.	Table salt	-



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2.3.1 TRAFFICKING IN ELEPHANT IVORY

CITES Appendix I (except populations from Botswana, Namibia, South Africa and Zimbabwe)

The poaching of African elephants has reached unprecedented levels, with an estimated 20,000–30,000 animals poached per year since the early 2010s. This is to supply a relentless demand in Asia primarily for their ivory; the international commercial trade in elephant ivory is prohibited, and only a few countries still maintain a legal domestic trade (Krishnasamy et al, 2020).

China has been considered the top consumer country for ivory. Since China's ivory ban entered into force in late 2017, Viet Nam's pivotal transit role for illegal ivory has strengthened. Recent evidence also suggests that the illegal ivory activity has increasingly shifted to Cambodia following legislative changes, a crackdown on the illegal trade in China, and border closures due to COVID-19.

Southeast Asian countries also play a critical role in the global ivory trade and all by Brunei Darussalam and Malaysia, have open domestic ivory markets. Cambodia, Lao PDR, Myanmar, the Philippines, Singapore, Thailand, and Viet Nam currently allow some form of domestic ivory trade, either of ivory from pre-CITES convention or from domesticated Asian elephants within their respective countries (Krishnasamy et al, 2020). Ivory trade is also open in Indonesia, though ambiguity and loopholes within national legislation encourage illegal trade. For some 30 years, Thailand had the largest unregulated domestic market globally, which enabled the laundering of African elephant ivory into its market. This changed when new laws were introduced in 2014 and 2015 (Doak, 2014; Krishnasamy et al., 2016a).

Kenya and Tanzania (including Zanzibar) were once prominent ivory trafficking hubs. However, over the past few years there has been a pronounced shift to Uganda, as well as West and Central Africa. Specific transport routes for ivory have been identified. They include exporting countries, such as Nigeria, DRC, Mozambique, Cameroon, and Republic of Congo, transit hubs, such as UAE, Hong Kong SAR, Singapore, Malaysia, South Korea, and Viet Nam, and destination countries, such as China, Viet Nam, and Cambodia (TRAFFIC, ReTTA Newsletter, 2019).

Maritime routes appear to remain the preferred method for smuggling large quantities of ivory, accounting for more than 64% of all seizures weighing over 500 kg recorded during the 2017-2019 period (WJC, 2019).

It is difficult to generalize specific cover products used to conceal ivory shipments, but they can be broadly categorized as low-value, bulk dry cargo exports. This is consistent with the claim that ivory consignments are relatively small



On 26 March 2019, Customs officials at Da Nang's Tien Sa Port in central Viet Nam seized more than nine tonnes of elephant tusks hidden in specially designed timber crates made to look like packs of timber logs originating from DRC, the largest ivory seizure in history. The suspicious shipment was detected by General Department of Vietnam Customs officers working in the Da Nang Port Control Unit, established and trained by the UNODC-WCO Container Control Programme. Under CITES guidelines, any seizure of 500 kg or more is considered indicative of the involvement of organised crime. (Source: <https://thanhnien.vn/thoi-su/bat-9-tan-nga-voi-nhap-lau-lon-nhat-tu-truoc-den-nay-tai-cang-tien-sa-1065139.html>)

compared to container volumes (the mass of approximately 20 tonnes per 20-foot container) and thus requires a considerable amount of cover materials to avoid suspicion, which can be costly (C4ADS, 2015). Timber seems to be the preferred method to conceal ivory currently (WJC, 2020a).

Combined shipments of both ivory and pangolin scales are increasingly common, and, at times, the volume of pangolin scales is greater than the weight of the ivory being smuggled. One reason for this may be due to the declining value of ivory exacerbated by the ivory ban in China since 2017 (WJC, 2019).

Malaysia is likely currently the single most significant transit country for illicit ivory trafficked between Africa and Asia, as well as a critical transit location for trafficked pangolin, illegal timber, and other wildlife products. This includes both as an intermediary point for maritime shipments from Africa with final destinations in Viet Nam, Thailand, Cambodia, China, or elsewhere in Asia, or as

a final declared destination country with onwards later transit in separate maritime shipments. Analysis of seizure data revealed that many larger shipments of illegal ivory out of Malaysian ports, appear to have been consolidated from multiple illegal consignments of ivory previously imported into Malaysia. This indicates the presence in

Malaysia of criminal facilitation networks involved in transcontinental wildlife trafficking. In other cases, individual consignments of ivory seem to have been stored in Malaysia for a time and then later shipped in their entirety to an end destination, typically elsewhere in Southeast Asia or China (UfW, 2018)

2.3.2 TRAFFICKING IN PANGOLIN PARTS

CITES Appendix I

A variety of uses in Asia drive the largest market for pangolin parts. The meat of the animals is considered a delicacy, while pangolin scales are used in traditional medicine. In North America, their skins were once popular in the leather industry. Pangolin population declines in Asia due to high trade levels have sparked an exponential increase of African pangolin trafficking (Krishnasamy et al., 2020)

All eight species of pangolin (four African species, four Asian species) are listed in CITES Appendix I and trade is not permitted. A ban on the import of pangolins or pangolin scales has been in place in China since 2017.

An estimated 206.4 tonnes of African pangolin scales were intercepted and confiscated from 52 seizures between 2016-2019 period, and at least 54% of those seizures were trafficked by sea (WJC, 2020). Data shows a significant and rapid increase in the volume of pangolin scales being trafficked through international seaports and that it is likely that a significant proportion of smuggling passes undetected. The primary destinations of known pangolin seizures are Vietnam and China including Hong Kong SAR; en route to these and other markets, pangolin products often trans-ship through countries like Singapore and Malaysia (C4ADS, 2020). Chinese diaspora in Nigeria have led to the country being classed as one of the top consumers of pangolin meat, alongside China (WJC, 2020). Nigeria is also the most heavily implicated country in the supply chain of pangolin scales, especially between the years 2018-2019. The major syndicates have used Togo and Nigeria in the recent past to consolidate ivory and pangolin scales sourced from Central Africa shipping the commodities out of Rivers Port or, at times, also flown out of Nigeria.

Recent shipments from Matadi, DRC suggest an emerging trade route for pangolin scales. The Cameroon-to-Nigeria trafficking route is known by local investigators as crucial to supplying Nigeria with scales for the intercontinental

trade (C4ADS, 2020). Some shipments in the past have been associated with stockpiles in Tanzania, Angola, Kenya, Uganda, and Mozambique, illustrating the widespread nature, complexity and likely coordination of the criminal networks involved. The tremendous growth in the size of pangolin seizures linked to Central and West Africa suggests well-financed trafficking syndicates are increasingly operating out of these regions (C4ADS, 2020).

China has been the primary destination of pangolin scale shipments, though evidence seems to indicate that stockpiling of scales may be occurring in Viet Nam. As of October 2020, pangolin scales from national stockpiles in China are still legally utilized by Traditional Chinese Medicine (TCM) companies in medicinal formulae, providing a loophole for laundering of illegally sourced scales (EIA, 2020 and C4ADS, 2020).

Wildlife trafficking syndicates utilise various methods to move pangolin contraband from Africa to Asia, including concealing the scales into cargo containers with legitimate products, such as cashew, charcoal, timber logs, and metal scraps. Unlike within Asia where trafficking of live pangolin is possible between countries and states due to the proximity of consumer markets, distance has made it impractical for smugglers to traffic live pangolin from Africa to other continents due to stress and low chances of survival.

for smugglers to traffic live pangolin from Africa to other continents due to stress and low chances of survival.



Kaohsiung Customs officers standing in front of seized boxes of descaled and disembowelled pangolins that were smuggled into Taiwan from Malaysia. <https://www.taipetimes.com/News/front/archives/2018/02/03/2003686943>



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TRAFFICKING IN PANGOLIN MEAT

While uncommon, pangolin meat is known to have also been smuggled via maritime (refrigerated) shipping container from Southeast to East Asian countries/territories, particularly from Malaysia and Indonesia to consumer markets such as China and Viet Nam.

For example, in February 2018, Customs officers in Taiwan found 4,000 dead pangolins without scales or organs shipped from Malaysia to the port of Kaohsiung. The shipping company failed to return the container to its original address. The recipient did not submit a customs form and refused to accept the shipment, prompting the Customs office to inspect the container. Frozen sardines were stacked in the front section of the container concealing the pangolins at the back.



2.3.3 TRAFFICKING IN PROTECTED TIMBER

CITES status: see Table 3

When traded internationally, timber is a commodity sold and used in bulk; therefore seizure data are dominated by huge containerized shipments. The tropical forests of Southeast Asia, the Amazon basin, and Central Africa are at the heart of the illegal timber trade. Unlike illicit drugs, timber is typically fed into legal industries where its illegal origin is obscured. Timber illegally harvested in one country may be legal to import into another. Countries are not bound to enforce the forestry laws of other countries (UNODC, 2020), except for the following:

- Australia – Illegal Logging Prohibition Act, 2012
- EU – Timber Regulation, 2013
- Japan - Clean Wood Act, 2017
- Republic of South Korea – Act on the Sustainable Use of Timbers, 2012
- US - Lacey Act, 1900, amended 2008

The trade in illegal logs is one of the most lucrative criminal markets on earth, estimated between 15 and 30% of the overall market for wood products (INTERPOL, 2019). A large portion of the international timber trade within Asia and Africa is assessed to be illegal. In 2014, Chatham House provided the following estimates for the percentage of illegal exports of various countries: Republic of Congo (66%), DRC (60%), Cameroon (27%), Ghana (28%), Laos PDR (70%), Vietnam (14%), Indonesia (63%), Malaysia (18%).

China is the world's leading importer and exporter of timber, as well as a major processing centre; it is also the primary destination for the most illegally sourced timber exports. Most of the 10 largest suppliers⁶ of tropical timber to China rank in the bottom quarter of global ranking on measures of governance (Global Witness, 2019) highlighting legality risks. It is estimated that approximately 10 per cent of China's unfinished wood product imports comprise of illegal timber (EIA, 2012). For the longest time, the country lacked the prohibition of import of timber derived from illegal logging, however, in December 2019, China's forestry law was finally revised to ban 'purchase, process or transport' of illegal logs (Anon 2020b). This is a positive change but the more challenging aspect will be its enforcement.

Criminals typically use fraudulent documentation, such as invoices and permits, or use of common generic names such as 'rosewood' or 'black wood' without specifying the scientific

species name, to facilitate the laundering and smuggling of illegal timber. Most illicit timber can be laundered without difficulty, but easily identifiable protected species such as rosewood may require additional obfuscation. Protected timber is also mislabelled as non-CITES species or mixed with other legal timber species that look alike. It's common for CITES annotations to be circumvented; CITES permits to be falsified and certificate of origin being issued by non-recognised entities.

- In 2014, 92 tons of illegally harvested rosewood, some known to have originated from Honduras, was mislabelled as scrap rubber from Guatemala, transported to Mexico, then shipped to Hong Kong SAR, (Anon, 2014).

- In 2010, a container of round wood arrived in Rotterdam, Netherlands from Suriname. The B/L stated that the container had 37 pieces of round logs and nine pieces of root and that there were no CITES listed specimens in the container. The wood was identified by Customs as *Swietenia mahagoni* (American Mahogany) and was in violation of CITES II/EU Annex B. When confronted with the fact that the shipment did contain CITES-listed specimens, the importer claimed that the timber came from a different species *Swietenia microfilia*, which is not an accepted scientific name. In addition, the same importer failed to provide any CITES documentation and submitted supporting documents from a Commissioner in Suriname with an altered date.

'Rosewood' is a trade term used for a wide range of tropical hardwoods encompassing hundreds of species, many of which are protected under CITES (UNODC, 2020). Some of these are marketed under the Chinese classification of Hongmu, prized for use as high-end reproduction furniture, flooring and handicrafts. China's National Hongmu Standard from 2017 covers 29 species, many from the genera *Dalbergia* and *Pterocarpus*⁷. Still, a growing number of

species, including those from other genera, are increasingly integrated into the Hongmu trade. While significant demand exists in Viet Nam, China is the predominant consumer market for Hongmu products (EIA, 2016). The over-exploitation of Asian species of ‘rosewood’ has pushed rosewood traders to look farther afield for their supplies of *Dalbergia*, *Pterocarpus* and *Guibourtia* species. They may look to source localities where the species are not protected by national or international legislation, such as in Africa, in particular Madagascar, and also Latin America.

During the last decade, the share of total rosewood imports to China coming from Africa has steadily increased with a good portion suspected to have been illegally sourced in or exported from Africa (UNODC, 2020). Approximately 98 per cent of all of China’s Hongmu imports, both by value and volume, are from Africa and Asia. Viet Nam is also a significant importer of rosewood. Crime is a glaring characteristic of the global Hongmu trade; the increasing value of the limited critical species targeted has attracted criminal syndicates, illegal loggers and corrupt officials (EIA, 2016).

⁶ Papua New Guinea; Solomon Islands, Equatorial Guinea, Cameroon, Gabon, Mozambique, Indonesia, Nigeria, Malaysia and Republic of Congo

⁷ https://www.forest-trends.org/wp-content/uploads/2020/08/Revised_Hongmu_Species_2020_FINAL.pdf

Checklist:

- ✓ Pay attention to CITES listing as well as specific CITES Annotations. In addition to that remember that many countries apply full or partial bans on export of timber products for nationally protected species.
- ✓ For countries that have specific log export ban policies, consult: <https://forestlegality.org/content/logging-and-export-bans> (see Annex III of this compendium); as well those countries which have restricted or prohibited the export of specific forest products: <https://www.forest-trends.org/known-log-export-bans/>;
- ✓ For the export of timber, an export license or permit may be required, and the responsibility for issuance and inspection is usually delegated to agencies dealing with the timber industry;
- ✓ A Phytosanitary certificate is usually needed for logs with bark;
- ✓ For exports of CITES Appendix II species to the EU, a CITES import permit is also required;
- ✓ Run an online search to verify that timber shippers, especially those in high-risk trafficking countries, haven’t been previously exposed for large scale illegal logging (for example Deja Group in Gabon and Norsudtimber in Democratic Republic of Congo. Anon. 2019).

Table 3: List of most commonly trafficked CITES-listed timber species according to region.

	Species Name	Common Name	CITES listing and Annotations ⁸	Uses	Geographical range
Africa	<i>Dalbergia baronii</i>	Malagasy rosewood	App. II #15	Used for Hongmu products and musical instruments.	Madagascar and Tanzania. Note: The timber is often trafficked to other countries from which it is exported (Mauritius, Kenya, Reunion and Comoros)
	<i>Dalbergia lowelii</i>	Violet rosewood, Bois de Rose	App. II #15	Used for Hongmu products and musical instruments	Madagascar Note: Suspension of commercial trade in specimens of <i>Dalbergia</i> spp. from Madagascar until further notice, except <i>Dalbergia</i> spp. products which had been produced, registered and authorised for export before 2 January 2017
	<i>Dalbergia melanoxylon</i>	African blackwood, Mozambique ebony, African rosewood	App. II #15	Musical instruments and carvings	West, Central, East and Southern Africa, including Cameroon, DRC, Tanzania, Kenya, Mozambique and Nigeria; Australia and India.
	<i>Guibourtia demeusei</i>	Bubinga	App. II #15	Logs, sawn wood, veneer sheets	Cameroon, Congo, DRC, Gabon, Central African Republic, Equatorial Guinea
	<i>Guibourtia pellegriniana</i>	Bubinga, kevazingo	App. II #15	Logs, sawn wood, veneer sheets, furniture	Cameroon, Congo, Gabon, Nigeria

	<i>Species Name</i>	<i>Common Name</i>	<i>CITES listing and Annotations⁸</i>	<i>Uses</i>	<i>Geographical range</i>
Africa	<i>Guibourtia tessmannii</i>	Bubinga	App. II #15	Logs, sawn wood, veneer sheets	Cameroon, DRC, Equatorial Guinea, Gabon
	<i>Pericopsis elata</i>	African teak, afromosia, assamela	App. II #17	Logs, lumber and veneer	Cameroon, Central African Republic, Congo, Ivory Coast, DRC, Ghana, Nigeria
	<i>Pterocarpus erinaceus</i>	Kosso, African rosewood	App. II	Used for Hongmu products and musical instruments	Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Ivory Coast, The Gambia, Ghana, Guinea, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, Togo NOTE: The Gambia, Senegal, Burkina Faso, Ghana, Mali have banned the export.
	<i>Pterocarpus tinctorius</i>	Mukula rosewood, bloodwood	App. II #6	Commonly used for Hongmu products	Angola, Democratic Republic of Congo, Malawi, Mozambique, Tanzania, and Zambia
	<i>Widdringtonia whytei</i>	Mulanje cedar	App. II	Carvings and construction	Malawi
Asia	<i>Dalbergia cochinchinensis</i>	Siamese Rosewood	App. II #15	Used for Hongmu products	Thailand, Cambodia, Laos PDR, Viet Nam, Prohibited in all forms from being collected, stored and processed for domestic use of from being exported since 2013.
	<i>Dalbergia latifolia</i>	Indian rosewood	App. II #15	Logs and sawn timber are banned from trade under the Indian Forest Act.	India, Indonesia, Malaysia, Myanmar, Nepal, Nigeria, Pakistan, Philippines, Sri Lanka. (also found in Uganda, Tanzania Kenya, Mauritius, Reunion)
	<i>Gonystylus spp.</i>	Ramin	App. II #4	Used in finished products such as baby cot, snooker cue sticks, picture frames.	Indonesia, Malaysia
	<i>Pterocarpus santalinus</i>	Red sanders, red sandalwood	App. II #7	Used for Hongmu products	India and Sri Lanka
Latin America	<i>Dalbergia nigra</i>	Brazilian rosewood, Bahia rosewood	App. 1	Totally banned from trade.	Brazil
	<i>Dalbergia stevensonii</i>	Honduras rosewood	App. II #15	Sawnwood and logs Commonly used for Hongmu products	Honduras; Guatemala; Belize; Mexico
	<i>Dalbergia granadillo</i>	Cocobolo, granadillo	App. II #15	Commonly used for Hongmu products	El Salvador, Guatemala, Mexico and Nicaragua
	<i>Dalbergia retusa</i>	Cocobolo, prieto	App. II #15	Commonly used for Hongmu products	Belize, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Mexico, Nicaragua and Panama.
	<i>Swietenia macrophylla</i>	Big leaf mahogany	App. II #6	Sawnwood, veneer and furniture	Central and South America including Brazil, Guatemala, Mexico, Ecuador and Nicaragua. (Plantations are found in Southeast Asia which do not need a CITES permit)

⁸ See Annex II for # specifications of CITES annotations

2.3.4 TRAFFICKING IN SHARK FIN

CITES status: see table 4 below

Tens of millions of sharks and rays are killed annually to supply a growing demand mainly for their meat and fins. Whilst the meat is generally supplied to markets in Europe and South America, the fins are predominantly destined for Asian markets as the key ingredient in shark fin soup (Okes and Sant, 2019). The fins are the most valuable part of many sharks and it is estimated that between 26 and 73 million sharks (worth USD 400-500 million) are traded each year (Clarke et Al., 2007).

The vast majority of shark fin exports are destined for import by countries and territories in East and Southeast Asia such as Hong Kong, Taiwan, China, Singapore, Malaysia, and Viet Nam (Dent and Clarke, 2015). Hong Kong is the largest trader for shark fin, accounting for more than 40 per cent of the global shark fin trade, with most of the shark fin imported into Hong Kong entering via the ocean route, as a result of its high-volume imports and duty-free status (WWF HK, 2017). Singapore is the world's second-largest shark fin re-exporter by value after Hong Kong (Boon, 2017). Other major shark fin exporters include Spain, Indonesia, Taiwan, UAE and Japan; although approximately 83 countries worldwide are involved in the shark fin trade annually (Okes and Sant, 2019). Singapore and the UAE are not known shark producers; however, they have been identified as transit points for shark fin shipments coming from Africa, the Middle East, India, and Sri Lanka (Brown, 2020). The US has also been highlighted as an important transit location for shipments coming from South America. EU countries have also been implicated as a significant transit hub for global shark fin shipments coming from countries in West Africa en route to Asia (Brown, 2020).

Shark fin soup consumers have distinct preferences for particular species due to their high needle density, such as blue shark *Prionace glauca*, which is by far the most widely traded species internationally, as well as several shark species listed in CITES Appendix II such as hammerhead *Sphyrnidae* spp., and oceanic whitetip *Carcharhinus longimanus*.

For the last decade (2009-2019), the largest importers of shark meat were Brazil, Spain, Uruguay and Italy (UN Comtrade Database, 2020).

Table 4. Most trafficked shark and ray species listed in CITES Appendix II (as of August 2020).

COMMON NAME	SCIENTIFIC NAME
Basking Shark	<i>Cetorhinus maximus</i>
Great Hammerhead Shark	<i>Sphyrna mokarran</i>
Great White Shark	<i>Carcharodon carcharias</i>
Oceanic Whitetip Shark	<i>Carcharhinus longimanus</i>
Porbeagle Shark	<i>Lamna nasus</i>
Scalloped Hammerhead Shark	<i>Sphyrna lewini</i>
Silky Shark	<i>Carcharhinus falciformis</i>
Smooth Hammerhead Shark	<i>Sphyrna zygaena</i>
Thresher Sharks (3 species in total)	<i>Alopias spp</i>
Whale Shark	<i>Rhincodon typus</i>
Shortfin and Longfin Mako	<i>Isurus oxyrinchus and Isurus paucus</i>
Giant guitarfish	<i>Glaucostegus typus</i>
Wedgefish	<i>Rhinidae spp</i>
NB: All sawfish species are listed in CITES Appendix I and commercial trade is not allowed	

To export CITES-listed shark species, a permit must be issued by the exporting country's CITES MA to confirm that the shipment was obtained legally. Some CITES Parties such as China also require CITES import permits also for all CITES-listed sharks and rays.

The majority of the illegal trade in shark fins occurs through exports of CITES-listed shark species without the required permits or where the shipments have been misdeclared (box 5).

Shark fins are also seized where they have been sourced in contravention with national (anti-finning) regulations. In 2015, 4.5 tons of shark fins from shortfin mako and blue shark were seized at the Port of Vigo in Spain; the shark fins were caught in New Zealand and the fins were removed prior to unloading, which is in contravention with EU regulations. The practice of shark finning has been prohibited in many countries, with national regulations requiring that fishing vessels to land captured sharks with the fins still attached. While the EU has regulations in place which require the State of catch to validate that the exported products are linked to legal catches (Regulation (EC) No. 1005/2008), this is not the case for countries and territories in Asia, despite the fact that the majority of the world's shark fin exports are destined for import by Asia.

BE AWARE:

- Shark fins are commonly seized with other high-value products such as abalone, sea cucumbers, fish maws and seahorses.
- The fins of CITES-listed shark species are commonly hidden among fins of non-CITES listed species making them challenging to detect. Suspected illegal shipments should be investigated thoroughly in order to identify the presence of potential CITES-listed species.
- Online references for countries with full or partial bans on shark fishing and/or shark finning include: <https://awionline.org/content/international-shark-finning-bans-and-policies>

Box 5: examples of shark fin seizures

- In May 2020, 26 tonnes of dried fins from protected silky and thresher sharks were seized by Hong Kong Customs in shipments originated from Ecuador and declared as 'dried fish'.
- In 2017 - over 23 tons of shark fins, labelled as cucumbers and gherkins, were seized by US Customs in a shipment in transit via the US from Panama to Hong Kong SAR.
- In 2017 and 2018, shipments containing 6 tonnes and 8 tonnes of shark fins respectively, were seized in India as the cargo was declared as "fish products", "dried marine products" and "fish maw" to evade detection.



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2.3.5 TRAFFICKING IN SEA CUCUMBERS

Sea cucumbers (*Holothuria* spp): CITES Appendix II

Sea cucumbers (also known as bêche-de-mer and trepang) are harvested and traded in more than 70 countries worldwide (Purcell et al., 2012). Processed and dried sea cucumbers are exported in large quantities to Asia, particularly China, Singapore, Hong Kong SAR, and Japan, where they are considered a high-value seafood delicacy, commonly consumed at banquets, weddings and festive meals (Clarke, 2002) and used in TCM. Soaring demand among Asian's middle class has depleted regional stocks over the last few decades. This has driven fisheries to new regions including the Mediterranean and north-eastern Atlantic Ocean where sea cucumber fisheries are generally not regulated (Anon 2020c).

Due to international concern over the high exploitation levels, three sea cucumber species, *Holothuria whitmaei*, *H. nobilis* and *H. fuscogilva* were listed in CITES Appendix II at CoP18 (CoP18, Prop 45) in 2019 (Louw and Bürgener, 2020).

Most illegally collected sea cucumbers likely transit through Colombo port in Sri Lanka, which is also a consolidation and shipment hub for legal sea cucumber traders. Because sea cucumbers (and sharks) are protected in India and cannot be exported (Anon, 2018c), traffickers smuggle them via

fishing vessels to Sri Lanka. On arrival, they are laundered with licit shipments and moved via maritime transport to Hong Kong SAR or Viet Nam, for re-export to southern China, the primary demand market. Since June 2019, authorities in southern India have seized more than 18 tons of sea cucumbers from traffickers and poaching gangs (UfW, 2020). Egyptian seaports are also known as export hubs for illegal shipments of sea cucumbers. Globally, sea cucumber trafficking often occurs alongside seahorse trafficking.



2.3.6 TRAFFICKING IN SEAHORSES

Seahorses (*Hippocampus* spp.) CITES Appendix II

The demand for dried seahorses to supply the TCM markets across Asia continues to drive their exploitation from a growing number of source countries.

In addition to wild seahorses being listing in CITES App. II, many countries have also banned their exports completely because of concerns over their populations decline. Most notably, Thailand, the biggest seahorse source country on record, decided to suspend their exports in January 2016 (Anon, 2019c).

Hong Kong SAR is the largest global importer of dried seahorses. A study conducted between 2016 and 2017 found that the majority of the dried seahorses on sale in Hong Kong might be illegally imported; Hong Kong Traders reported that their biggest sources included Thailand, Philippines, mainland China, Australia, and India – yet

most of these countries have banned their seahorse exports (Foster, S. J, et al. 2019).

High levels of illegal or unsustainable trade in dried seahorses from Senegal, Guinea and Togo were highlighted by another study that compared CITES trade data of all seahorse species (*Hippocampus* spp.) over a 10-year period (2008-2018); the analysis found major discrepancies in reported trade volumes between the quantities of dried seahorses reported as exported from these West African countries (much higher) and the imported quantities reported by Hong Kong from these same countries (Louw and Búrgener, 2020b).



2.3.7 TRAFFICKING IN BIG CAT PARTS

Tiger (*Panthera tigris*): CITES Appendix I

Lion (*Panthera leo*): CITES Appendix II (except for the populations of India listed in Appendix I)

Asian leopard, jaguar and snow leopard (*Panthera pardus*, *Panthera oca*, *Panthera uncia*): CITES Appendix I

Pumas (*Puma concolor*): CITES Appendix II (except for populations in Costa Rica and Panama listed in Appendix I)

Demand for tiger bones for use in traditional medicine and formulations in some Asian countries persists due to long-held beliefs. As wild tiger populations have dwindled, bones from other big cat species such as lion, leopard and jaguar are being used as a replacement ingredient either for ‘tiger’ wine or gelatine (a highly processed product made by boiling bones until they form an odourless gelatine).

At times, these substitutions are marketed explicitly, but often buyers are not even aware that a new species has been introduced. In South Africa, exporting bones of lions bred in captivity is legal, though a special permit is required. A recent study noted reports of smuggling of lion skeletons, gelatine, and other parts such as claws and teeth. An additional complexity is the more than 280 captive tigers in South Africa; raising concerns that tiger bones from South Africa are being laundered as lion bones to Viet Nam and China (TRAFFIC, 2018).

Captive tigers and lions are farmed, in part, for production of bone products to fill demand for wine and TCM products. Jaguar bones and rendered jaguar carcass paste is increasingly being shipped to Asia from South America, although mostly via air transport (Anon 2018d). Big cat products, including teeth, are sometimes moved by gangs involved in the illegal trade in ivory and rhino horn and shipped out in containerized sea cargo, often concealed and mis declared as other legal commodities (see Box 6).

Box 6

A shipment of two containers declared as tea leaves originating from Kenya, was seized in transit in Singapore on its way to Viet Nam after authorities discovered 1,783 pieces of raw ivory tusks, four pieces of rhinoceros horns



Photos: AGRI-FOOD & veterinary authority and Singapore customs

and 22 pieces of canine teeth believed to be from African big cats. The contraband was concealed among bags of tea dust. (Anon, 2015b)



2.3.8 TRAFFICKING IN RHINO HORNS

African and Asian rhino species (*Rhinocerotidae* spp) are all listed in CITES Appendix I (with exception of South Africa and Swaziland (now called Eswatini) populations of *Ceratotherium simum simum* in CITES Appendix II)

Rhinos are poached solely for their horns. These are trafficked as whole horns but may also be carved into libation cups or beads and are sometimes crushed and sold as a powder to be used in Asian traditional medicines and informal tonic preparations. Mostly trafficked through air transport from Africa to market countries in Southeast and East Asia, rhino horn has also been sporadically observed in mixed containerized shipments, as a secondary product with large ivory and pangolin shipments [see box 7], though rhino horn is also trafficked alone at times. Rhino horn traffickers heavily rely on southern Africa as a source region.

Box 7

In January 2021 Nigeria Customs seized a 20 feet container bound for Vietnam at the Apapa Port; The container was found to contain the remains of various endangered wildlife species, including 2,772 pieces of elephant tusks weighing about 4,752kg, 162 sacks of pangolin scales weighing 5,329kg, 5kg of rhino horns, dried and fresh animal bones, 103 kg of skulls suspected to be of lions and other wild cat and 76 pieces of timber. The shipment was falsely declared as furniture components (Anon, 2021).



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2.3.9 TRAFFICKING IN SOUTH AFRICAN ABALONE

Not CITES listed, but national quota in place

Abalone is primarily classified as a Chinese delicacy. Abalone is a typical part of celebratory banquet menus for Chinese communities, and is popular at weddings, festivals, such as the Chinese New Year, and family or business gatherings. It is also purchased and consumed at home. Dried abalone is considered the highest quality, as the salt content is partially removed through the drying process.

At least 56 species of abalone occur around the world. The meat and shell of the abalone are highly prized commodities, meaning that many species and populations are heavily exploited. There is also a growing aquaculture industry that makes up a large proportion of global legal trade. However, the demand for abalone outweighs farm production and creates a perverse incentive in some abalone range states to poach abalone from the wild for the lucrative international market. This is the situation concerning South African abalone (*Haliotis midae*) trade, where illegally sourced abalone makes up the majority of exports that end up in key consumer markets, such as Hong Kong SAR. Despite stringent quotas, poachers illegally dive for wild abalone off the southern coast of South Africa. Behind the poaching is a network of organised criminal syndicates involved in the trafficking of South African abalone, in its wake disenfranchising coastal communities, who barter poached abalone for drugs. A vast network of handlers and smugglers then move the illicit abalone stocks out of the country.

South African abalone is not protected internationally (i.e., not CITES-listed), but harvest and trade within South Africa are restricted. A harvest quota of 96 tonnes of wild-caught abalone is allowed each year, and aquaculture operations produce about 1,800 tonnes annually. In 2018, an estimated 5,300 tonnes of abalone were poached, amounting to more than 15 million individual abalones. Illegally harvested wild abalone is believed to be prevalent in international trade, and around 60% is estimated to be trafficked to Asia, mostly via sea containerized shipping.

As there are no corresponding laws in key transit and consumer countries that recognize the illegality of poached abalone, shipments that arrive at ports of import countries are not often interdicted. Even where a consignment is known to contain poached abalone, importing countries can only seize the consignment where the importer fails to declare that it is abalone.

Traffickers have used a variety of concealment methods and these are typically combined with misdeclaration of a cargo's contents at the exit port. Dried abalone has previously been found hidden between other commodities, such as plastic bags and duvets. In some cases, cardboard boxes holding dried abalone are simply declared as containing other commodities. Abalone has also been hidden in frozen form between boxes of frozen fish. The most common trade route is from South Africa to Hong Kong SAR.

A recent analysis suggests that up to 43% of illegally harvested abalone was traded through several non-abalone-producing sub-Saharan African countries to Hong Kong SAR, including countries such as Angola, Republic of Congo, Democratic Republic of the Congo, Namibia, Zambia, Zimbabwe, Mozambique, and the Kingdom of Eswatini (previously Swaziland). Except for Namibia, which produces minimal quantities of farmed abalone, abalone is not legally processed or transhipped through any of these countries. Thus, it is believed to be smuggled from South African to these sub-Saharan countries by road or air to then be re-exported to Hong Kong SAR (Okes, 2018).



Beyond normal Customs trade declarations and manifests, some countries now require an accompanying health certificate for certain shipments. China has introduced a health certificate requirement for low-risk food products, such as dried abalone. For Hong Kong SAR, which receives the bulk of the world's dried South African abalone shipments, health certificates can be submitted voluntarily, and shipments may be subject to inspection if they are not accompanied by a certificate. A health certificate may, nevertheless, be sought by traders in Hong Kong SAR, to facilitate re-export to China. As of August 2020, South Africa had not officially approved the issuance of such permits for dried abalone.

BE AWARE - A shipment of Abalone from Africa is likely to be illegal when:

- Dried abalone is exported from a sub-Saharan country outside of South Africa, with the exception of Namibia;
- Dried abalone is traded in South Africa by an exporter and producer that is not recognized* by the South African Department of Environment, Forestry and Fisheries.

For wild-caught abalone shipments, get in touch with South Africa's Department Environment, Forestry and Fisheries to verify that the shipment is from a legal harvester.

* All South African exporters need an export permit from the Department for export of seafood products. This must be presented to officials at port of export in South Africa therefore all legal harvesters and farmers need to have a permit to do so.

2.3.10 TRAFFICKING IN DONKEY SKINS

Not a CITES-listed species, but subject to national export bans from many African countries

China's current demand for ejiao (阿胶), a TCM produced through processing donkey skins into gelatine, used for treating a range of blood conditions, is driving the illegal donkey trade to unprecedented levels.

Since the 2010s skins have surged in value—fetching up to \$400 each (Anon, 2017). Donkey populations in China have dropped by more than 75% in the last two decades, pushing traders to procure skins from developing countries with abundant donkey populations such as those in Africa. Recent large-scale seizures of illegal donkey skins indicate there is convergence with trafficking in endangered wildlife species. In South Africa, criminal networks trafficking donkey skins also engage in illicit abalone trafficking.

In April 2020, Hong Kong customs seized a large illegal shipment of donkey skins along with 0.5 tonne of sea cucumbers, 2 kg fish maws, and one tonne of dried shark fins, arriving from Egypt and likely harvested illegally in the Mediterranean.

Protections for donkeys are uneven globally, with some countries allowing the trade in skins while others outlaw the practice, leaving room for cross-border trafficking to launder skins into the legal trade. In countries bordering jurisdictions with legal donkey skin trades, donkey rustling and trafficking increase.

Populations of donkeys have dropped by more than half in countries which allow the trade and within neighbouring states (UfW, 2020). Countries such as Botswana, Burkina Faso, Ethiopia, Mali, Niger and Senegal have banned exports

in donkey products, however skins are known to be smuggled into Kenya and other countries in the continent where export is not illegal (Brooke, 2020)



RECOMMENDATIONS & BEST PRACTICES

While vulnerable to the abuses of traffickers, the maritime shipping industry can minimize risks. It can do this by adopting preventative and mitigation measures aimed at strengthening their supply chain processes and compliance by remaining vigilant, knowing what to look out for, including IWT red flags considerations in their risk analysis and acting as the ‘eyes and the ears’ for the law enforcement. When trading in or with countries with high-level of corruption, extra due diligence should be performed on customers and shipments.

3.1 PREVENTATIVE MEASURES

A. Know Your Customer - adopt best practices to ensure that your clients are engaged in legitimate trade, such as:

- Implementing a **‘risk-based approach’** when onboarding new customers. In particular, conduct thorough due diligence if you’re operating out of countries known to be ‘high-risk’ for wildlife trafficking (see also table 2 and box 8 of this report);
- Performing ongoing monitoring of your established customers and establish related escalation and mitigation protocols.

Box 8: Here are some of the questions that you should ask yourself when assessing potential new clients (or monitoring existing ones).

- Is the shipper a registered business entity? Does it have a tax ID? Is it a member of the national Chamber of Commerce or the relevant business association?
Conduct searches on local corporate registry to verify that the company is active. **(Remember: recently established companies maybe a risk factor!)**
- Does the company exist on the web? Own or third party website? Does its website corroborate the stated line of business? (For example a **Nigerian timber company sending a one-off shipment of cashew nuts should sound suspicious**)
- Can you geo-locate the company? Is it a private residence or commercial property? Are multiple other businesses registered at the same address?
(Remember: **the inclusion of fake addresses on documentation is a possible indicator of a shell company**)
- Are the IP address, phone, and email address consistent? Is it a business email address or - for example a gmail, yahoo account? Who answers the phone?
(Conduct searches for adverse media coverage on shipper in local language sources. Links between Africa-based shippers and Vietnamese or Chinese individuals/companies it might be a risk factor)

- B. Conduct due diligence when hiring new employees** to verify their integrity and any potential past involvement in fraudulent activities.
- C. Adopt a zero-tolerance corporate policy** for any act linked to illegal wildlife trade and related corrupt behaviour; convey this directly to all employees, subcontractors and clients. Review your terms of carriage policy on the transportation of smuggled wildlife and inform clients that your company reserves its right to waive confidentiality for the information provided by the shipper and to disclose it to law enforcement agencies in case of regulation infringement. As an example, some of the world's largest shipping companies have established a No Shark Fin Carriage policy; while the operationalization of such global policy remains challenging, some tools have been created to support this endeavour (See section 3.5 Toolbox/shark fin).
- D. Raise the awareness and capacity** of employees about the business risks associated with wildlife trafficking and the latest trends on concealment methods and trafficking routes (see section 3.5 toolbox). Front line staff are the gatekeepers for accepting or rejecting shipments; therefore adequate and frequent training is needed.
- E. Develop and maintain a caution list of fraudulent shippers/clients and other known bad actors** (persons, companies, freight forwarding and clearing agents suspected of IWT or other illicit activities).

WCO's HS code

The World Customs Organization Harmonized System code (WCO HS code) is a multipurpose international nomenclature to classify traded products.

"It comprises about 5,000 commodity groups; each identified by a six-digit code, arranged in a legal and logical structure and supported by well-defined rules to achieve uniform classification." The Harmonized System is governed by the International Convention on the Harmonized Commodity Description and Coding System. Countries and regions can add additional digits after the sixth digit, to narrow commodity classifications even further according to specific tariff and statistical requirements they may decide to introduce unilaterally. In Hong Kong SAR for example, the HS code was extended to eight digits.

- F. Encourage shippers to use of WCO's HS codes** and include them in B/Ls to strengthen Customs' ability in their container risk profiling.
- G. Ensure timely provision of shipping documentation to Customs.** Support the work of the local Customs agencies with timely provision of shipping documents to enable effective container/cargo risk profiling and investigations. Collaboration between the public and private sector is essential in identifying and disrupting wildlife trafficking flows.

In Hong Kong SAR, people who import the goods need to complete import declarations within 14 days after the importation of the goods. If shipping companies would provide more details about the products they are carrying before their ship enters Hong Kong, the Customs and Excise Department will have more time to perform risk profiling and, therefore, detect illegal shark fin shipments (WWF HK, 2017).

- H. Collect (if national legislation allows) shipper, agent and consignee information**, such as phone numbers, email, addresses, to support critical evidence for the Law Enforcement. This can be used in investigations and court cases when such companies are involved in trafficking attempts.
- I. Go digital** – use of digital documents and automated transport processes improve traceability and transparency of operations allowing for faster detection of irregularities, possible fraudulent attempts and corruption.
- J. Implement supply chain security programmes** such as World Customs Organization's Authorized Economic Operator (AEO) programme and the Customs Trade Partnership Against Terrorism (CTPAT). Such programmes help your business reduce risk from exposure to illicit activities while benefitting from facilitated trade transactions.
- K. Become a member of the National Association** relevant to your line of business, the Chamber of Commerce and or other national, regional and international initiatives to help you stay up to date on latest issues and best practices to counter illicit trade.

3.2 DETECTION OF SUSPICIOUS SHIPMENTS

A good practice to mitigate the risks of trafficking, as well as to deter it, involves the use of standard operating procedures (SOPs) and risk profiling to identify and how to handle suspicious-looking shipments. Remember to always follow your company's training and guidelines, when looking out for possible fraudulent documentation.

- A. Conduct due diligence on shipments** - identify anything that seems unusual (see section 2.1) and trust your instincts if something doesn't seem quite right.
- Look out for shipments of legal wildlife (fauna and flora) with anomalous, incomplete, or otherwise suspicious certificates. If handling a cargo with CITES related species, run extra checks and if in doubt contact the CITES authorities in your country⁹, and check against the list in the CITES website for the agencies who are authorised to sign the permits. For example, for timber exports to the EU, a CITES import permit is also required (see also sections 1.4 and 2.2 on CITES).
 - For other cargo declared to contain animal or timber derivatives, carefully check the certificates (e.g., phytosanitary, fishery, veterinary and quarantine certificates) to ensure that what is being transported is what's stated, and that the product is not banned in the country of origin (see also annex III).
 - Overall, if shipping information is incomplete or you're in doubt, ask the shipper for clarification and additional information.
- B Integrate IWT specific red flag indicators into your company's cargo risk assessment systems** that may already be in place to detect other forms of contraband.
- Be aware of goods that are known to be used to conceal wildlife such as plastic waste, raw or squared wooden logs, frozen food, fish maws, various kinds of beans, stone or quartz blocks; and of high-risk trafficking routes involving Africa, Latin America and Asia (See also Table 2 and Chapter 2 on red flags of this compendium).
- C Stay up to date** on latest IWT red flags and trends as traffickers employ new concealment methods and trafficking routes or reintroduce old ones (See also section 3.5). Local enforcement agencies such as Customs could also be a good source for such information.
- E Establish SOPs** (if not in place yet) to guide employees on what steps to take in case of suspicious illegal shipments.

NOTE – companies based in high-risk countries should pay particular attention to exports

Some species are only protected at national level (through national bans, or other restrictions) and once their specimens or products enter other countries and new jurisdictions it is often impossible to enforce that protection status given in the origin country. There are a few exceptions e.g. US - Lacey Act, 1900, amended 2008, and specific to timber: Australia – Illegal Logging Prohibition Act, 2012, EU – Timber Regulation, 2013, Japan - Clean Wood Act, 2017, and Republic of South Korea – Act on the Sustainable Use of Timbers, 2012.

The illegal wildlife and timber trade could be more easily targeted if each country were to consider prohibiting, under national law, the entry, exit or in some cases, possession, of wildlife products that were illegally harvested in, or illegally traded from, anywhere else in the world (UNODC, 2020).

- F Keep a list of relevant government contacts for technical advice.** Make sure you know who to contact within relevant government agencies to seek expert technical advice when assessing shipping documentation (e.g., CITES MA for CITES protected species, Fisheries department for marine-related shipments, Forestry department for timber-related shipments, Customs department, etc.).

By recognizing the red flags, inspecting documentation thoroughly, and asking the right questions, you should be able to identify when instances of trafficking might be occurring.

⁹ List of CITES Authorities: <https://cites.org/eng/cms/index.php/component/cp>

3.3 REPORT WILDLIFE CRIME

If you are already in possession of a shipment that raises red flags, a decision needs to be made about referring it to the appropriate enforcement or regulatory authority.

- A. Follow the company SOPs on reporting suspicious shipments.** First, make sure you know what your company's SOPs for reporting. Often you might be expected to report to your direct supervisor depending on your position, rather than directly to the local enforcement authority. Your company might also have strict procedures in place that you will need to follow to address suspected cases of trafficking.
- B Record details.** It is vital to present the right information when reporting. Record details from the shipping documents, including details of the shipping agents, the exporting company, the importing company and their addresses.
- C Anonymous reporting.** Whistleblowing on illicit activities can sometimes backfire when you find yourself in a corrupted environment, especially when you're unsure who you can trust. Check if your company or government has a whistleblowing system/anonymous line you could use to report or tip-off corrupt practices and IWT without exposing your identity.
- D Alert colleagues** about any illegal shipment found and concealment methods observed so they can be on the lookout as well (including colleagues in other countries).

REMINDER! Once you've detected and reported a suspected case of wildlife trafficking, it is important that items that could be used to help the investigation are secured and protected. Do not let unauthorized people handle the goods, or interfere with packaging, or the shipping documentation in any way that could compromise potential forensic evidence. The shipment should be treated as a crime scene. If you've taken any photographs of the cargo or documents, this should be given to authorities to assist in their investigation.

It is proven that tip-offs from private sector staff have been crucial in alerting local authorities of wildlife trafficking attempts. As a maritime transport operator, you can have a similar impact by reporting any suspicious activity.



3.4 BEST PRACTICES IN THE TRANSPORT SECTOR

Leadership in countering IWT from transport sector businesses such as shipping lines, freight forwarders, courier companies and airlines has strengthened over the past decade. Below are some examples of the leading private sector-led initiatives that companies could learn from:

United for Wildlife: Led by Prince William and The Royal Foundation, United for Wildlife aims to make it impossible for traffickers to transport, finance or profit from illegal wildlife products. By working collaboratively with the transport and finance sectors, building key partnerships with NGOs, and sharing information and best practices across the sectors, they detect and disrupt illegal wildlife trade activity. For more information: <https://unitedforwildlife.org/>

The ROUTES Partnership - The USAID Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) Partnership brings together air transport and logistics companies, government agencies, development groups, law enforcement, conservation organizations, and donors to disrupt wildlife trafficking by reducing the use of legal transportation supply chains. The Partnership is coordinated by TRAFFIC, learn more at <https://routespartnership.org/>.

Maritime Anti-Corruption Network (MACN) is a global business network working towards a maritime industry free of corruption that enables fair trade to the benefit of society at large. Established in 2011 by a small group of committed maritime companies, MACN has grown to include over 130 companies globally, and has become one of the pre-eminent examples of collective action to tackle corruption. Read more at <https://macn.dk/>.

Digital Container Shipping Association (DCSA), founded by several of the largest container shipping companies, works towards alignment and standardization for universally adoptable solutions to enable transparent, reliable, easy to use, secure and environmentally friendly container transportation services. DCSA's open-source standards, are developed based on input from DCSA member carriers, industry stakeholders and technology experts from other industries and are free for everyone to use. Read more at <https://dcsa.org/>.

Mediterranean Shipping Company's Global Targeting Centres - In response to its commitments as a signatory of the UfW's Buckingham Palace declaration, MSC has set up three specialized screening centres in strategic locations and created a brand-new detection system using the most recent algorithm technologies to analyse incoming booking and shipping documentations in real-time, evaluating IWT risk and consequently assigning to each shipment a risk score according to specific criteria such as routing and shipper information.

Examples of international maritime enforcement-led Initiatives

- The UNODC-WCO Container Control Programme (CCP) has established a global network of more than 115 law enforcement units at ports in more than 55 countries to counter illicit trafficking of all kinds of goods, including wildlife and timber.
- The UNODC Global Programme for Combating Wildlife and Forest Crime is a UNODC initiative which specifically targets wildlife and forest crime worldwide.

Both programmes deliver cutting-edge technical capacity building training to law enforcement authorities and the private sector, and maintain global networks of law enforcement officers to enhance law enforcement knowledge and cooperation. More can be found at their websites:

- <https://www.unodc.org/unodc/en/ccp/index.html>
- <https://www.unodc.org/unodc/en/wildlife-and-forest-crime/index.html>



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3.5 TOOLBOX

This section is a compilation of existing resources and tools. Please note that it is not exhaustive.

Capacity building to prevent IWT and other illicit trade in transport Supply Chains:

- FIATA digital course on the prevention of IWT for freight forwarders. The course is available in English, Spanish, French, Chinese, Arabic, Russian and Portuguese <https://fiata.proversity.org/courses/course-v1:FIA+TRA001+2019/about#>
- ROUTES Partnership training material: <https://routespartnership.org/training-modules>
- TT Club due diligence report: <https://www.ttclub.com/-/media/files/tt-club/stop-loss/stop-loss-21---due-diligence.pdf>
- WCO Framework of Standards to Secure and Facilitate global trade (SAFE) and the Authorized Economic Operator (AEO) Programme: <http://www.wcoomd.org/en/topics/facilitation/instrument-and-tools/tools/aeo-compendium.aspx>
- WCO's HS codes: <https://www.wcotradetools.org/en/harmonized-system>

IWT Red flags:

- **United for Wildlife Taskforce Intelligence Bulletins** are joint monthly advisories for both Buckingham Palace and Mansion House Declaration Signatories on issues of high concern related to wildlife trafficking and the finance and transport sector (please contact: report@unitedforwildlife.org).
- The **Wildlife Trade Portal** is an interactive tool that displays TRAFFIC's open-source wildlife seizure and incident data (<https://www.wildlifetradeportal.org/#/dashboard>).

CITES and ICCWC related

- Introductory digital course on CITES <https://www.informea.org/en/introductory-course-convention-international-trade-endangered-species-wild-fauna-and-flora-cites>
- CITES Species Database: <https://checklist.cites.org/>
- List of national CITES Authorities: <https://cites.org/eng/cms/index.php/component/cp>
- Full list of CITES certificates: <https://www.cites.org/sites/default/files/eng/prog/exemptions/SUMMARY-OF-USE-OF-PERMITS-CERTIFICATES-IN-CITES-2018.pdf>
- CITES Notifications: <https://www.cites.org/eng/notif/index.php>

Species related:

- IUCN Red List <https://www.iucnredlist.org>
- Species+ centralised portal on species of global concern <https://www.speciesplus.net/about>

Elephant ivory:

- Ivory Identification guide https://cites.org/sites/default/files/ID_Manuals/R8_IvoryGuide_07162020_low-res.pdf

Timber:

- Known Forest Products Export restrictions - <https://www.forest-trends.org/known-log-export-bans/>

- Logging and Export Bans (Forest Legality Initiative) - <https://forestlegality.org/content/logging-and-export-bans>
- Timber Trade Portal – legislation and timber industry information on countries - <https://www.timbertradeportal.com/en/>
- Timber species identification – Global Timber Tracking Network (GTTN) - <https://globaltimbertrackingnetwork.org/>
- Wood identification guide – The Wood Database - <https://www.wood-database.com/wood-articles/wood-identification-guide/>
- Tool to detect anomalies in illegal timber trade (US, China, Peru) <https://dac-wwf.cs.vt.edu>
- Chatham House’s Forest Governance and legality tool monitoring forest governance and legality in 19 countries <https://forestgovernance.chathamhouse.org>

Shark fin:

- List of countries with full or partial bans on shark fishing and shark finning: <https://awionline.org/content/international-shark-finning-bans-and-policies>
- National laws, multi-lateral agreements, regional and global regulations on shark protection and shark finning (As of October 2019) <https://www.hsi.org/wp-content/uploads/2019/06/2019-Shark-Fishing-and-Finishing-Regulations.pdf>
- WWF guidelines for no shark fin policy and list of shipping companies that banned shark fin shipments (as of 1 June 2017). https://d3q9o70b7kewus.cloudfront.net/downloads/shark_report_eng_web.pdf
- Shark fin identification field guide for CITES listed species (available in Arabic, Bengali, English, Spanish, French, Portuguese and Chinese). <https://www.identifyingsharkfins.org>
- 3D identification tool for most common CITES listed shark fin species (<https://www.traffic.org/3d-replica-shark-fins/>)

Corruption related:

- Transparency International’s Corruption Perceptions Index: <https://www.transparency.org/en/cpi/2019/results/tha>
- Targeting Natural resource corruption (TNRC): <https://www.worldwildlife.org/pages/tnrc-about-the-project>
- Scaling Back Corruption - A Guide on Addressing Corruption for Wildlife Management Authorities (UNODC, 2019): https://www.unodc.org/documents/corruption/Publications/2019/19-08373_Scaling_Back_Corruption_ebook.pdf
- Rotten Fish - A Guide on Addressing Corruption in the Fisheries Sector (UNODC, 2019): https://www.unodc.org/documents/Rotten_Fish.pdf

ANNEX I: TYPICAL DOCUMENTS ENCOUNTERED IN CONTAINER SHIPMENTS

Bill of Lading (B/L)

The B/L is the document issued by the carrier (shipping line or agent) to a consignor (shipper of the goods) to acknowledge receipt of the goods and to describe what is being transported. It is the contract of carriage for the shipment of goods from the port of lading to the port of destination. B/Ls can be:

- **Negotiable:** The carrier is required to deliver the goods to the person who presents the original B/L which was originally given to the shipper; the holder of the original B/L has the right of ownership of the goods and the right to re-route the shipment.
- **Non-negotiable:** the carrier is required to deliver the goods only to the consignee named in the document.

The information included on the B/L is provided by the shipper in English, but sometimes also in Spanish or French depending on the prevalence of the language spoken in the shipper's country.

In addition, if a B/L is not available due to a multi stop voyage a Letter of Indemnity (LoI) can be issued in lieu of this. An example of the wording; *should a bill of lading not arrive at the discharge port in time, owners should release the entire cargo without presentation of the original bills of lading. Charterers hereby indemnify owners against all consequences of discharging cargo, without presentation of the original bills of lading.*

Sea Waybill

Sea Waybill is the evidence of the transport contract and the receipt of the goods, but it only serves as evidence. In this way the carrier is released with the delivery of the cargo to the person identified in the document.

Manifest

The manifest is a list of all goods, listed per all the bills of lading, which were loaded onto the ship in one certain port, and which has a single certain destination. The manifest is issued in the POL by the carrier (usually the shipping line/agent) and signed by the captain. In case of a joint venture (whereby different carriers use the same vessel to ship their cargo), each carrier will issue a manifest for each port of discharge. Thus, it is possible that there are different manifests covering only one vessel.

Invoices

An invoice is a document prepared by the seller and or exporter showing the value of the goods and the delivery conditions. Commercial invoices include most of the details of the entire export transaction.

Packing list

A packing list is a list or inventory of individual items in a specific container. A shipment may be accompanied by a packing list, but this is not mandatory.

Licenses and certificates

In some cases, licenses, permits or certificates are required, some examples include (list is not exhaustive):

- CITES permits for CITES-listed species (Import, Export, Re-export)
- Phytosanitary Certificates for plant products (e.g., fruit and wood)
- Veterinary certificates for animal products
- Certificates of Origin (important for a possible tariff reduction of import duty)
- Licenses for certain products related to quotas such as textiles, shoes and sportswear

Certificate of Origin (CoO):

A document that evidences that the goods in your export shipment were produced, manufactured, or processed in a particular country. It requires standard information, such as the exporter, consignee, shipment routing, and goods description.

Letter of Indemnity (LoI):

A document exempting one party from liability to any claim that may arise from the other party. They are given by cargo interests and parties above them in the contractual chain to obtain cargo at a discharge port without delay in circumstances where the original bills of lading are not immediately available.

Letter of Credit

A Letter of Credit is a formal, binding legal agreement between an importer and foreign seller. A Letter of Credit is a primary means of payment in an international trade transaction.

Insurance certificates

A cargo insurance certificate is a document that indicates the type and amount of insurance coverage in force on a given item. It is used to assure the consignee that insurance is provided to cover loss or damage to cargo during the shipment process.

ANNEX II: CITES ANNOTATIONS

- #1 - All parts and derivatives, except:
- a) seeds, spores and pollen (including pollinia);
 - b) seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers;
 - c) cut flowers of artificially propagated plants; and
 - d) fruits, and parts and derivatives thereof, of artificially propagated plants of the genus *Vanilla*.
- #2 - All parts and derivatives except:
- a) seeds and pollen; and
 - b) finished products packaged and ready for retail trade.
- #3 - Whole and sliced roots and parts of roots, excluding manufactured parts or derivatives, such as powders, pills, extracts, tonics, teas and confectionery.
- #4 - All parts and derivatives, except:
- a) seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia). The exemption does not apply to seeds from Cactaceae spp. exported from Mexico, and to seeds from *Beccariophoenix madagascariensis* and *Dypsis decaryi* exported from Madagascar;
 - b) seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers;
 - c) cut flowers of artificially propagated plants;
 - d) fruits, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genus *Vanilla* (Orchidaceae) and of the family Cactaceae;
 - e) stems, flowers, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genera *Opuntia* subgenus *Opuntia* and *Selenicereus* (Cactaceae); and
 - f) finished products of *Aloe ferox* and *Euphorbia antisyphilitica* packaged and ready for retail trade.
- #5 - Logs, sawn wood and veneer sheets.
- #6 - Logs, sawn wood, veneer sheets and plywood.
- #7 - Logs, woodchips, powder and extracts.
- #8 - Underground parts (i.e. roots, rhizomes): whole, parts and powdered.
- #9 - All parts and derivatives except those bearing a label:
- “Produced from *Hoodia* spp. material obtained through controlled harvesting and production under the terms of an agreement with the relevant CITES Management Authority of [Botswana under agreement No. BW/xxxxxx] [Namibia under agreement No. NA/xxxxxx] [South Africa under agreement No. ZA/xxxxxx]”.
- #10 - Designates logs, sawn wood and veneer sheets, including unfinished wood articles used for the fabrication of bows for stringed musical instruments.
- #11 - Logs, sawn wood, veneer sheets, plywood, powder and extracts. Finished products containing such extracts as ingredients, including fragrances, are not considered to be covered by this annotation.
- #12 - Logs, sawn wood, veneer sheets, plywood and extracts. Finished products containing such extracts as ingredients, including fragrances, are not considered to be covered by this annotation.
- #13 - The kernel (also known as ‘endosperm’, ‘pulp’ or ‘copra’) and any derivative thereof.
- #14 - All parts and derivatives except:
- a) seeds and pollen;
 - b) seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers;
 - c) fruits;
 - d) leaves;
 - e) exhausted agarwood powder, including compressed powder in all shapes; and
 - f) inished products packaged and ready for retail trade, this exemption does not apply to wood chips, beads, prayer beads and carvings.
- #15 - All parts and derivatives, except:
- a) Leaves, flowers, pollen, fruits, and seeds;
 - b) Finished products to a maximum weight of wood of the listed species of up to 10 kg per shipment;
 - c) Finished musical instruments, finished musical instrument parts and finished musical instrument accessories;
 - d) Parts and derivatives of *Dalbergia cochinchinensis*, which are covered by Annotation # 4;
 - e) Parts and derivatives of *Dalbergia* spp. originating and exported from Mexico, which are covered by Annotation # 6.
- #16 - Seeds, fruits and oils.
- #17 - Logs, sawn wood, veneer sheets, plywood and transformed wood.
- #18 - Excluding parts and derivatives, other than eggs

ANNEX III: LOGGING AND EXPORT BANS

All inside the brackets: (Extracted from <http://www.forestlegality.org/content/logging-and-export-bans> as of 31 March 2021)
Please regularly check the website for updates.

COUNTRY	PRODUCT SCOPE	STATUS	LAST UPDATE
Albania	Ban of logging in all forests and the export of timber.	2016 - Present	May 2016
Belarus	Exports of saw-logs are banned unless otherwise stated by the President of Belarus Republic.	2016 - Present	December 2017
Belize	All raw rosewood exports in 1992 but lifted the ban in 1996. A new ban on the harvest and export of rosewood in 2012.	1992 - 1996; 2012 - Present	August 2017
Brazil	Exports of logs from natural forests are banned, but plantation logs are allowed for export.	1996 - Present	August 2017
Bolivia	Export of unprocessed forestry products is subject to restrictions and highly regulated (forest certification mainly).	1996 - Present	May 2016
Cambodia	Complete ban on exports of logs and rough timber since 1996, followed by a logging ban within the Permanent Forest Estate in 2002. January 2016 embargo on all timber exports to Vietnam.	1996 - Present	August 2016
Cameroon	A partial log export ban scheduled in 1999 on more than 20 species of raw logs excluding Ayous. 20% tax on exports of logs since 2017.	Export ban first enacted in 1999, but lifted now	May 2018
Canada	Restrictions on log exports from British Columbia. There are a variety of federal and provincial regulations regarding log exports.	1906 - Present	May 2016
China	Complete ban on commercial logging in all-natural forests.	2017 - Present	April 2017
Colombia	Restrictions on log exports from natural forests. Only roundwood from planted forests can be exported. Restriction have not been well enforced, and large amounts of logs are still exported.	1997 - Present	May 2016
Costa Rica	Log export ban, and export ban on roughly squared wood from specific species.	Undetermined (First enacted in 1986)	May 2016
Cote d'Ivoire	Export ban on logs from natural forest. A ban on harvesting, transporting, and trading of <i>Pterocarpus</i> spp.	Ban on natural log exports: Undetermined – Present; Ban on <i>Pterocarpus</i> spp.: 2013 - Present	March 2018
Croatia	A two-year export ban on oak logs and oak timber with a moisture content of more than 20%. The regulation applies to both trimmed as well as untrimmed products.	2017 - Present	August 2017
Ecuador	Roundwood export ban, except in limited quantities for scientific and experimental purposes. Semi-finished forest products exports are allowed only when “domestic needs and the minimum levels of industrialization have been met.”	2005 - Present	May 2016

COUNTRY	PRODUCT SCOPE	STATUS	LAST UPDATE
Fiji	Log export ban in place since 1997. Certain wood and wood products are prohibited for export unless the specified requirements are met.	1997 - Present	August 2016
Gabon	A full ban on exporting logs.	2010 - Present	August 2017
Ghana	A ban on felling, harvesting, and exportation of rosewood in 2014. A national ban on rosewood export was announced in early 2017 but is lifted now.	First enacted in 2014; Reactive in early 2017; Currently lifted	March 2018
Guatemala	Exports of logs of more than 11 cm in diameter are banned, unless they originate from plantations. Ban does not apply to furniture and processed products made from wood. Guatemala established a national red list of trees to protect in 2006. The 81 species in Category One are banned from export and commercial uses.	2006 - Present	May 2016
Honduras	Export ban on hardwood and sawn wood.	1998 - Present	August 2017
Indonesia	Log export ban first issued in 1985 until 1992. Raw log export ban re-activated in 2001, expanded to sawn wood in 2004. Plantation log exports are allowed since 2017.	First enacted in 1985; Reactive 2001 - 2017; Currently lifted for plantation log exports	December 2017
Laos PDR	A total logging ban in natural forest areas, a harvesting ban for protected species and a ban on exporting roundwood from natural forests, but plantation-grown timber can be harvested and exported with the proper paperwork.	First enacted in 1989; Reactive 2015 - Present.	August 2016
Madagascar	Prohibition on logging, transport, and export of rosewood and ebony (Decree 2010-141) and on the export of logs and unworked palisander (Decree 2007-10885).	First enacted 1975, followed by multiple fluctuations. Reactive 2010 - Present	December 2017
Malaysia	In Peninsular Malaysia, a ban was imposed on the export of ten species in 1972 and expanded to a complete ban in 1985. In Sabah, a temporary log export ban from 1993-1996, reactive since May 2018. Malaysia banned the export of rubberwood in 2017.	Peninsular Malaysia: 1972-Present; Sabah: 1993-1996, 2018 - Present; Rubberwood: 2017 - Present	June 2018
Mozambique	An export ban on raw logs. Logging and collection of <i>Pterocarpus tinctorius</i> specie (nkula), <i>Swartzia madagascariensis</i> (ironwood), and <i>Combretum imberbe</i> (mondzo) are banned. An export ban on three species: Chanfuta, Umbila, and Jambire.	Export ban on raw logs: 2007 - Present; Other bans: March 2018 - Present	April 2018
Myanmar	An export ban on raw logs of all species since 2014. Raw timber from private forest plantations can be exported since July 2018.	2014 - Present	July 2018
New Zealand	Export ban on indigenous timber (native species from natural forests) logs and woodchips, with certain exceptions outlined in the 1949 Forestry Act and its 1993 and 2004 Amendments.	1993 - Present	August 2016

COUNTRY	PRODUCT SCOPE	STATUS	LAST UPDATE
Nicaragua	Precious hardwoods export ban (mahogany, royal cedar and pochote). Mahogany exports are allowed only in the form of sawn wood, plywood or veneered wood. Sawn wood exports require a license.	1997 - Present	August 2017
Nigeria	Log export ban.	1976 - Present	May 2016
Panama	Export ban of logs, stumps, roundwood or sawn wood of any species from natural forests, as well as from wood submerged in water.	2002 - Present	May 2016
Papua New Guinea	Export ban on round logs for selected species since 1990. Logs can be exported from concessions given before 2010. There is ban on the export of logs from concessions given after 2010.	First enacted in 1990; Reactive 2010 - Present	August 2016
Peru	Log export ban. Export of forest products “in their natural state” is prohibited except when they originate from nurseries, forest plantations, and if they do not require processing for final consumption.	1972 - Present	May 2016
Philippines	A ban on cutting and harvesting in natural and residual forests throughout the country.	2011 - Present	August 2017
Sri Lanka	Logging ban in all-natural forests.	1990 - Present	August 2017
Thailand	Ban on timber harvesting and raw log exports from natural forests.	1989 - Present	August 2017
Ukraine	10-year ban on the exports of all types of raw logs.	2015 - Present (applying to pine exports from 2017)	April 2017
United States	Ban on export of spruce and hemlock logs from federal lands in Alaska since 1926; An export ban on unprocessed timber from federal lands west of the 100th meridian, except where there is timber surplus to domestic needs, since 1990.	1926 - Present	July 2018
Viet Nam	Log export ban; export ban on sawn timber from natural forests.	1992 - Present	August 2016

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