



THE SHUIDONG CONNECTION:

Exposing the global hub of the illegal ivory trade



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COVER IMAGE:

Aerial photograph of Shuidong,
Guangdong province, China.

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LOCATIONS OF SHUIDONG TOWN AND MAOMING CITY IN GUANGDONG PROVINCE, CHINA



SUMMARY

Surprising many, and putting other countries to shame, China has taken significant steps to close its legal domestic ivory market in the past year. This is a positive move by a country with one of the biggest ivory markets and demonstrates leadership and pragmatism. However, there remain serious questions on the lack of enforcement in China, and abroad, against Chinese nationals deeply involved in the illegal ivory trade, who continue to operate with complete impunity.

Following on from leads gathered in Tanzania in 2014, the Environmental Investigation Agency (EIA) began investigating neighbouring Mozambique, a country whose elephant population has been devastated by poaching and the illegal ivory trade.

What followed was beyond anything EIA could have anticipated.

The investigation in Mozambique revealed a Chinese-led criminal syndicate which for over two decades has been trafficking ivory from Africa to Shuidong, its hometown in southern China. According to this syndicate, it is just one of about 10 to 20 similar groups originating from Shuidong. Their criminal exploits reveal how their small hometown has become, and remains, the world's largest hub for ivory trafficking: the group claims up to 80 per cent of tusks from poached elephants in Africa pass through Shuidong.

Over the course of more than a year, discussions with the traffickers gave an unprecedented insight into the methods used to source, ship and sell raw tusks, and to manage profits. They provided fascinating detail on the significance of Shuidong in global illegal ivory flows.

Since supplanting Chinese gangs from Fujian as the main raw ivory traffickers more than a decade ago, the Shuidong syndicates have remained untouched by any enforcement action in China or abroad. Although some ivory shipments have been intercepted, the only loss is financial and the groups have developed various mechanisms for limiting this risk.

By being flexible and adaptable, the Shuidong syndicate is relentless in its pursuit of profit from wildlife crime. With the profitability of tusks from East Africa falling, the Shuidong smugglers have moved into more profitable forest elephant ivory and pangolin scales. When enforcement improved in

Tanzania, they shifted to neighbouring Mozambique. Their relentless criminal activities continue to be a major factor in the ongoing slaughter of elephants and other wildlife across Africa.

Without enforcement action against organised criminal networks, elephants and other wildlife will continue to be threatened by the illegal wildlife trade. The Shuidong syndicates in China and Africa need to be investigated and prosecuted urgently. Continued inaction against groups such as these, undermines China's announcement to close its legal domestic ivory market and will render it futile in the fight against elephant poaching.

Specific policy and enforcement recommendations are included at the end of this report.

Actionable information from this investigation has been shared with the relevant enforcement authorities.





ABOVE:

Billboard seen at Bohe town next to Shuidong, which reads 'Building a strong and comprehensive anti-smuggling frontline'.

THE SHUIDONG CONNECTION

It was past midnight on a night in October 2016 when the prospective ivory buyers arrived at the outskirts of Shuidong, in China's Guangdong Province, to view a cache of tusks recently arrived from Mozambique. The journey had begun in the centre of Shuidong, home to the criminal group which had trafficked the tusks.

At an earlier lunch meeting, two members of the group, Xie and Ou, had met with the buyers to vet them one final time. Satisfied they were genuine, the sellers agreed to arrange a viewing but it could not take place until the early hours of the following day as the tusks had to be moved to a secure location.

Late in the evening, Ou collected the buyers and they began their journey along narrow, winding roads. After

20 minutes the car pulled up outside a two-storey house in a remote location. Waiting to greet the buyers was Wang, the third member of the trafficking group. The buyers were taken into the house and shown into a side room. A light was switched on to reveal large elephant tusks laid out for inspection.

A discussion on price, payment terms and advice on transporting the tusks to the buyers' warehouse followed. The traffickers were looking for a quick sale so the profits could be reinvested in another consignment of ivory from Africa. After promising to consult their boss and get to them the following day, the prospective buyers were driven back into town by Ou.

The buyers immediately left Shuidong and drove off, keen to leave the area as soon as possible. They were undercover investigators from EIA and had no intention of buying the tusks – they had just successfully infiltrated the shadowy world of the Shuidong ivory syndicates.

FIRST ENCOUNTER, 2014

EIA began investigating the role of the Shuidong syndicates in the illegal ivory trade after a chance encounter in Tanzania in September 2014. At that time, evidence was emerging of the shocking scale of elephant poaching in the African country; it lost 60 per cent of its elephant population between 2009-14.⁵

Evidence from ivory seizures indicated that Zanzibar in Tanzania had emerged as a significant ivory trafficking hub, ferrying tusks from elephants poached in southern Tanzania to markets in East Asia.⁶ In August 2011, a consignment of 1.9 tonnes of ivory tusks concealed in dried fish was intercepted in Malindi Port, Zanzibar, bound for Malaysia. Two years later, an even bigger seizure of 2.9 tonnes of tusks, hidden among seashells and bound for the Philippines, occurred in the port. In both cases, local freight agents were arrested but there was scant information on the identity of the leaders of the smuggling syndicates.⁷

Sources in mainland Tanzania told EIA investigators that the main ivory smugglers operating in the country came from a town called Shuidong in China's Guangdong Province – and that these individuals were in the sea cucumber trading business in Zanzibar.

CHINA'S ROLE IN IVORY TRADE AND POLICY RESPONSES

The statements made by this criminal network on the volumes of ivory it trades, and the deep-rooted connection of Shuidong to the global ivory trade, help to confirm what many have known for a long time – that China is the global centre of demand for elephant ivory and the world's main destination for illegal ivory.¹

China recently took laudable steps to close its legal domestic ivory market.² After announcing it would implement a ban and close its domestic ivory market by the end of 2017, China has since followed through, closing 67 licensed ivory workshops and retailers in March 2017, with the remaining 105 to be closed before the end of the year.³ This has, quite rightly, been labelled as a 'game changer'; China's licensing system was open to abuse and illegal ivory was routinely being smuggled into its domestic markets.⁴

However, despite a historical involvement in sourcing ivory from Africa that stretches to nearly 20 years – and allegedly accounting for up to 80 per cent of the country's ivory imports – there has not, to EIA's knowledge, been a single notable arrest in this region of China.

EIA travelled to Zanzibar and eventually met with Shuidong native Wei Ronglu, a sea cucumber trader who had been based there since 2011. Wei was at first evasive but later talked at length of the methods used by Shuidong syndicates to smuggle ivory.

FROM SEA CUCUMBERS TO IVORY - SHUIDONG'S ROLE: 1990s ONWARDS

Wei explained that in the 1990s, the trafficking of ivory from Africa was controlled by criminal groups originating from Putian, in China's Fujian Province, before being replaced by the Shuidong syndicates. As a result of this shift, Zanzibar, where the Shuidong sea cucumber traders congregate, had become the "biggest hub in Africa for ivory trading", shipping tusks out from Tanzania, Kenya and Mozambique under the cover of legal marine product businesses.⁸

Located on the coast of Guangdong Province, Shuidong's emergence as the world's biggest hub for wholesale ivory trading is rooted in its culture and geography. Administratively, it falls under Dianbai County, a district of Maoming City which has a population of almost eight million people. The area is known as a trade centre for a range of marine products including fish maw, lobsters and squid, with Shuidong specialising in sea cucumber trade.

Harvested for over a thousand years, sea cucumbers are seabed-dwelling marine animals found throughout the world's seas and oceans. They are prized in China for their high protein content and supposed health benefits. Until recently, the bulk of sea cucumbers consumed in China came from regional waters. As a result of China's economic growth, there has been a rapid increase in Chinese demand for sea cucumbers sourced globally, including from East Africa.

Dominated by Shuidong people, an international network has sprung up to supply this booming market. From the 1990s onwards, growing numbers from Shuidong fanned out across Africa searching for sea cucumbers and fish maw, with key hubs including Mwanza and Zanzibar in Tanzania, Mombasa in Kenya and Lagos in Nigeria.

With their growing knowledge of doing business in Africa, experience of supply routes back to China, presence in strategic coastal towns and their business cover, the Shuidong traders in East and West Africa were well-placed to move into the illegal ivory trade. They were ready to take advantage of China's demand for ivory, which grew rapidly in the late 1990s.

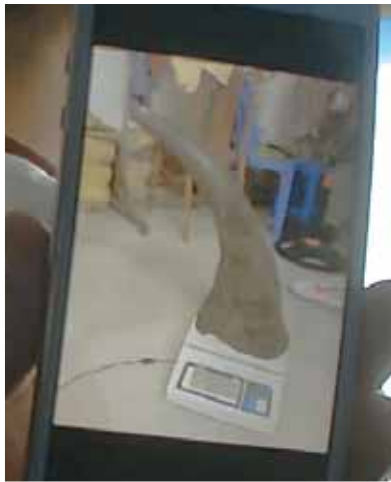
Cultural factors have also played a role. Unique to the Maoming area, people from Shuidong speak a dialect which originated from the Putian area of neighbouring Fujian Province. As one of the main ivory carving centres in China,⁹ Putian is the chief market for raw ivory tusks smuggled by the Shuidong syndicates.

Shuidong's geographical location is also advantageous to its role as China's main raw ivory trading hub. To the east lies Hong Kong, one of the world's busiest ports and an important transit route for bulk ivory shipments. To the west lies Guangxi Province, which shares a porous border with northern Vietnam where the port of Hai Phong is another frequent transit route for ivory. To the north-east lies Fujian Province, one of the biggest ivory processing areas in China.¹⁰

BELOW:

In places such as Tanzania, the sea cucumber business acts as a cover for the illegal ivory trade. Sea cucumbers are a prized delicacy in China.





Apart from ivory, the Shuidong group also trades in a variety of endangered and illicit wildlife products, including pangolin scales, rhinoceros horns and totoaba maws. All images are from this investigation

OTHER SPECIES TRADED BY THE GROUP

EIA: Do you often go to Africa?

XIE: Yes, I've been going ... for many years.

EIA: Oh, you've been there a lot? What do you do there?

XIE: Before I did sea cucumbers ... shark fins ... those things.

Now, it's not possible to do that anymore.

EIA: If that can't be done, what do you do then?

XIE: Now ... we just do this... I do ivory, pangolin scales.

At this level in an illegal wildlife trade chain, there are rarely specialists who trade exclusively in, for example, ivory. Traders instead seek to exploit legal loopholes, poorly regulated transport and logistic networks, and weak enforcement to trade in multiple threatened species.

The Shuidong syndicate fits this pattern. As well as elephant ivory, the group also trades in pangolins from Africa and Asia, totoaba fish maws from Mexico, rhino horn from Africa and has previously traded in sea cucumbers from Tanzania. It is unknown where the group was trading shark fins. It is able to move rapidly from one group of species to another and the main factor driving the decision to trade or not is, of course, profit.

During the course of this investigation, EIA has witnessed the group shifting its operations from savannah elephant ivory to forest elephant ivory and pangolin scales. Pangolin scales are becoming increasingly attractive as an investment as they are cheaper to source and less risky to smuggle; the profit margins are higher than for either type of ivory. These pangolin scales are being traded to dealers and traditional Chinese medicine producers in China, who then sell them on to pharmaceutical companies.

Wei described a closed network, with syndicate leaders in Shuidong orchestrating shipments of tusks arranged by people from their hometown who were based in Zanzibar as sea cucumber traders. The syndicate members on the ground were extremely cautious, protecting themselves by building a network of Tanzanian accomplices; they avoided contact with the ivory and ensured only the names of their local co-conspirators, employed as freight agents, appeared on shipping documents.

Wei revealed that it took up to three years to build such local networks. Local Tanzanians were tasked with sourcing the poached tusks and storing ivory safely at locations on the mainland until a load of about three tonnes had been collected. The contraband would then be transported to Zanzibar on small vessels and stored at warehouses for packing in a container, concealed in legitimate and low-value goods such as seashells, plastics or agricultural products.

Shipment would also be handled by the trusted Tanzanians, as would payments of about \$70 per kg of ivory to customs officers and port officials to ensure safe departure. Even with these extensive safeguards in place, Wei said the Shuidong smugglers would observe the loading of the container onto the designated vessel from a vantage point overlooking the port. At any sign of trouble, the Chinese would be prepared to leave Tanzania immediately.

Such careful planning and execution ensured that the vast majority of ivory consignments left Zanzibar unimpeded. Wei estimated that only one in every 20 shipments was intercepted and spoke of a single Shuidong syndicate which had successfully smuggled out 20 containers of ivory in 2013 alone.

Wei even offered EIA's investigators the opportunity to invest in an ivory consignment. He would be responsible for the Zanzibar end of the shipment and for arranging a meeting with his "brothers" in Shuidong to discuss the financing, estimating that a payment of \$1.3 million would be sufficient. He said: "Over here, we will be responsible for collecting the goods. Our friends in Guangdong, our brothers, will be in charge of receiving the goods and selling them. When the time comes, the profit will be transferred to you."

THE MOZAMBIQUE MEETING, 2016

In April 2016, EIA investigators travelled to Mozambique on a fact-finding mission. As enforcement against elephant poaching and ivory smuggling in neighbouring Tanzania had gradually improved, and with a series of high profile cases and prosecutions of Chinese nationals, it was rumoured the traffickers were switching their attention to Mozambique.

In the port town of Pemba, in northern Mozambique, EIA encountered a group of three Chinese nationals. An important industry in the region is the timber trade, which Chinese companies dominate; the presence of Chinese nationals in Pemba was therefore unsurprising. What did stand out, however, was their unique dialect – they were from Shuidong.

During initial conversations, the three stated their reason for being in Pemba was to sell aluminium window frames

and to look into sourcing sea cucumbers and lobsters. This seemed implausible, given the group had flown all the way from Guangzhou via Nairobi to reach Pemba.

Over the course of five days, EIA developed a rapport with the three Shuidong people: all in their thirties, they introduced themselves as Ou Haiqiang, Xie Xingbang and Wang Kangwen. They were also accompanied by an unidentified Tanzanian national who drove a black sedan car with a Tanzanian number plate. Every day the group would leave early with the Tanzanian, returning to the hotel late in the afternoon.

As time passed, they began talking about wildlife trade, especially ivory, but denied being directly involved in the business, although Ou eventually admitted to having done ivory deals in the past while based in Tanzania.

After departing Mozambique, EIA investigators maintained contact with Ou and Xie, slowly winning their

BELOW:
The three ivory traffickers in a hotel in Pemba, Mozambique.



confidence until they met again in Shuidong and then later in the Chinese city of Shenzhen.

Over time, the traffickers explained their history in the ivory trade. Ou first visited Uganda and Tanzania in 2008 to trade fish maws, with Xie arriving in Tanzania around the same time to trade sea cucumbers. Both speak passable Swahili, testament to the time they have spent in East Africa.

It emerged that Ou and Xie were second generation ivory smugglers. Their uncles had been part of the first wave of Shuidong people to move to Africa in the early 1990s. Xie's uncle, Xie Yingjue, went to Tanzania and Mozambique around 1990 to collect sea cucumber; he went on to become a major ivory trafficker for the next two decades and in 2008 invited his then-jobless nephew to join him in Tanzania. Working with a Tanzanian, Xie's uncle became rich from ivory and built one of the most luxurious mansions in Shuidong, retiring about 2012 just as major ivory seizures started increasing. By this time, Xie had learnt the trade and taken over his uncle's business contacts, including the expansion of his interests in Pemba. Xie forged an alliance with the nephew of the Tanzanian accomplice – this was the unidentified Tanzanian accompanying the three Shuidong traders in Pemba in April 2016.

Ou also described his uncle, Ou Guanchao, as an experienced ivory smuggler, successfully running ivory trafficking routes from several African countries and becoming extremely wealthy in the process. Married to a Vietnamese woman, Ou's uncle prefers to send ivory shipments into China via Vietnam. As a joint investor, Ou collaborated with his uncle in a series of ivory shipments from Tanzania around 2012. The shipments were routed via Vietnam and four containers were successfully sent to Shuidong, providing a profit of approximately \$8 million for Ou. His luck changed in 2013 when two containers were seized in Hai Phong and Zanzibar in quick succession. His uncle insisted that Ou bear the entire loss of about \$5 million and the two never cooperated again.

Ou had previously been arrested twice in Tanzania but on both occasions paid his way out of trouble. Moreover, he was involved in another shipment of ivory which was seized in Singapore in 2015 after being shipped from the Kenyan port of Mombasa. The seizures and arrests marked the end of Ou's ivory trading activities in Tanzania and disrupted his preferred trafficking route via Vietnam: by 2015, however, he and his partner Xie were looking for new opportunities and routes, and switched operations to Pemba in Mozambique.

BELOW:
(From top to bottom)
Xie Xingbang, Ou Haiqiang,
and Wang Kangwen.



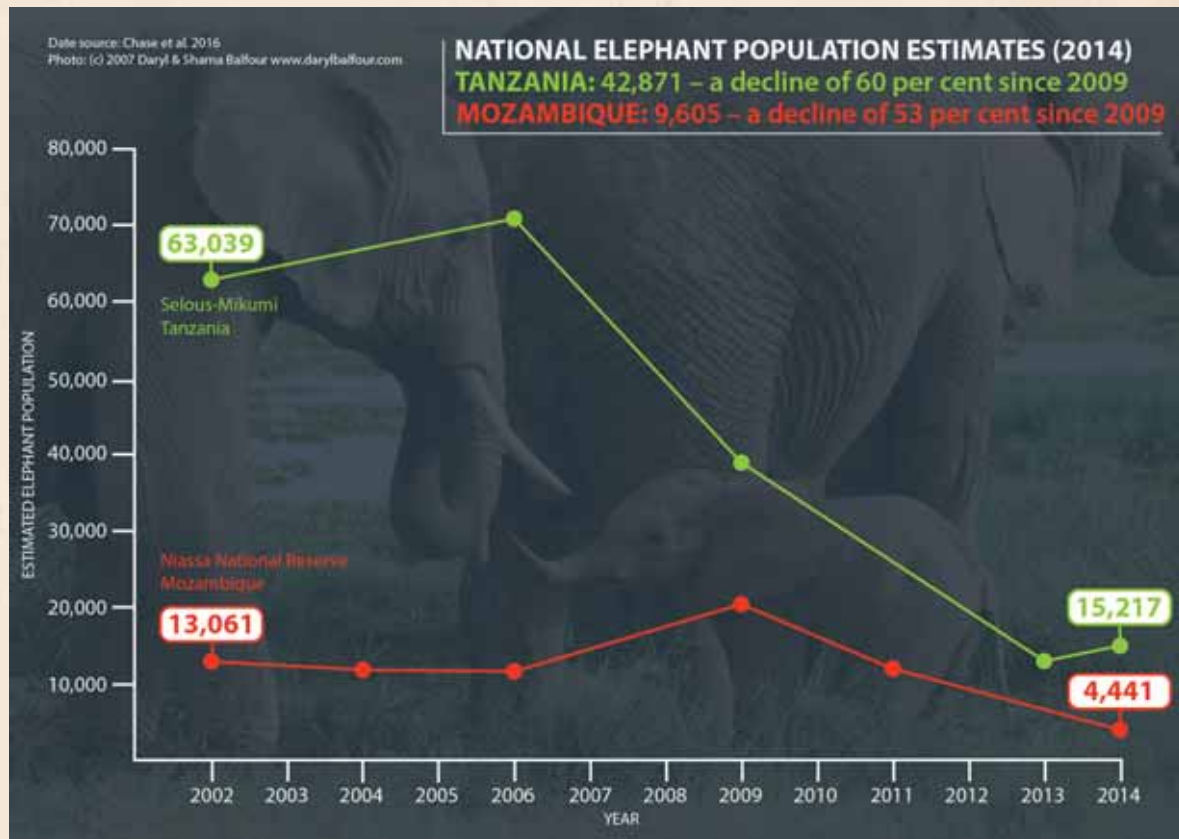
SHUIDONG GROUP CASE STUDY: ORGANISED CRIME CHARACTERISTICS^{1,2,3}

| | |
|---|----------|
| Provision of high-quality lawyers and (attempted) corruption of judicial process | ✓ |
| Financial investment in start-up | ✓ |
| Sophistication of smuggling techniques and routes | ✓ |
| Use of persons of high political or social status | ✓ |
| Previous convictions for other types of crime | ✓ |
| Use of mules or couriers | ✓ |
| Huge profits | ✓ |
| Multiple shipments | ✓ |
| Corruption | ✓ |
| Money laundering | ✓ |
| Collaboration with other organised groups | ✓ |
| Geographic scope and influence | ✓ |
| Use of intelligence to defend against law enforcement and rival groups, and to identify new targets | ✓ |
| Diversification of activities | ✓ |
| Cohesion (financial relationships, length of association and geographic origins) | ✓ |
| Use of fake or front companies | Possibly |

1. Composite based upon the characteristics from the following sources and excluding overlapping categories: CITES Secretariat. 2005. Presentation to CITES Silk Road Enforcement Seminar at Urumqi, China.
2. United Nations (UN) Economic and Social Council. Illicit trafficking in protected species of wild flora and fauna and illicit access to genetic resources: Report of the Secretary-General. Commission on Crime Prevention and Criminal Justice Twelfth session, Vienna, 13-22 May 2003. E/CN.15/2003/8. https://www.unodc.org/documents/commissions/CCPCJ/CCPCJ_Sessions/CCPCJ_12/E-CN15-2003-08/E-CN15-2003-8_E.pdf
3. Royal Canadian Mounted Police. 2010. SLEIPNIR Version 2.0 Organized Crime Groups Capability Measurement Matrix. Ottawa.

THE DECLINE OF ELEPHANTS IN MOZAMBIQUE AND TANZANIA

Mozambique and Tanzania have played a critical role in supplying ivory to criminal networks. Forensic analysis of several large ivory seizures confirmed that the two countries were major sources of illegal ivory.¹¹ Over a five-year period (2009-14), Tanzania lost 60 per cent of its elephant population and Mozambique 53 per cent.¹² These were two of the worst recorded population declines of savannah elephants in Africa based on surveys in 2014.



Tusks from elephants poached in Mozambique, 2012



The cross-border Selous-Niassa ecosystem, spanning south-eastern Tanzania and northern Mozambique, once had a large elephant population.¹³ However, it experienced a devastating decline and lost an estimated 75 per cent of its elephants between 2004-14, primarily due to poaching.¹⁴ Forensic analysis of seizures identified it as an important source of illegal ivory.¹⁵ UNESCO declared the Selous Game Reserve a "World Heritage Site in Danger" because of the widespread poaching.¹⁶

Poaching levels in 2015 remained high in the Selous-Niassa ecosystem – more than 70 per cent of the elephants found dead were illegally killed.¹⁷ More elephants are being killed each year than are being born. These high poaching levels will cause the local extinction of elephants if not halted and reversed.

The deadly ivory trade has reduced once-significant savannah elephant populations, exceeding 100,000 elephants in the Selous in the 1970s, to fewer than 20,000. It can only be hoped this decline is stopped before elephants disappear forever from these iconic landscapes in eastern Africa.



ABOVE:
Pemba port, Mozambique, 2012.

THE PEMBA SHIPMENT: 2016

Detailed discussions provided an unprecedented insight into an active ivory smuggling ring and the methods used to source, ship and sell raw tusks and manage profits. Ou and Xie described how they came to be involved in the criminal enterprise and gave fascinating detail on the methods used to traffic ivory and the importance of their hometown in global illegal ivory flows.

After the initial encounter with the three Shuidong ivory traffickers in Pemba during April 2016, EIA maintained regular contact and met with them back in their hometown in June 2016, the first in a series of meetings. Back on their home turf, Ou and Xie were more confident and open. They revealed their real reason for travelling to Pemba was to inspect three tonnes of elephant tusks and oversee the packing, loading and payment procedures. It had been Ou's first visit to Pemba, while Xie had been there once before while working for his uncle. Ou said: "It was the first time we had met you. I didn't dare tell you much or discuss these things. Now we are back in China, I can tell you whatever I want! Over there, I didn't want to say too much. I went over there to move the goods out before returning back here."

During the following months, EIA gradually won the confidence of the Shuidong traders until being invited to inspect the Mozambique tusks in China in October.

Each of the Shuidong group had a defined role in the operation:

- Ou Haiqiang: investor, with a 50 per cent share in the consignment and also responsible for arranging buyers back in China;
- Xie Xingbang: employed as a fixer by Ou to coordinate collection of the ivory because of his long-standing association with the Tanzanian national accompanying the group;
- Wang Kangwen: representative for a Hong Kong-based businessman known only as "Nan-Ge", or "elder brother Nan", who invested the other 50 per cent.

The decision to travel all the way to Pemba from China to inspect the tusks prior to despatch was informed by an earlier shipment from the town in 2016, also co-financed by Ou and Nan-Ge. On that occasion, they contacted a Mozambican supplier and placed an order for 3.5 tonnes of tusks. The supplier discouraged them from conducting a physical inspection, claiming it would be too risky for him to have Chinese people visit his warehouse. Full payment was transferred prior to shipping, but when the load arrived it weighed only 2.9 tonnes and 100kg were of poor quality. As Ou had introduced the Mozambican supplier, he conceded the better-quality tusks to Nan-Ge; Ou was left with poor quality ivory and lost money on the deal.

The experience did not deter the group from trying again. Improved enforcement

Ou told EIA:
"Frankly, it's easier to do this business in Mozambique ... it's easier to operate. In Tanzania, don't even think about it." Xie later added: "We're able to move anything through Pemba. Everyone there has been bought."

in neighbouring Tanzania had cemented their resolve to find new sources and trafficking routes. While in Pemba, Ou told EIA: “Frankly, it’s easier to do this business in Mozambique ... it’s easier to operate. In Tanzania, don’t even think about it.” Xie later added: “We’re able to move anything through Pemba. Everyone there has been bought.”

For the group’s second shipment out of Pemba, they opted to employ Xie’s trusted Tanzanian associate to collect the tusks and liaise with a different Mozambican supplier. Contacts on the ground confirmed to EIA that the Tanzanian is a frequent visitor to the area and is known to associate with a group of local elephant poachers.

An order for three tonnes of tusks was placed, with an advance payment made to the local suppliers in Mozambique and Tanzania to fund the collection process. The initial payment was half of the cost of the consignment, a fee of \$300 per kg. This was referred to as the “Bill of Lading” price. It covered payment of around \$80-100 per kg of ivory to the local poachers, funds to buy arms and ammunition, food for poaching trips and bribes for police and customs officers.

All local payments are made in US dollars, with the group using Chinese black market moneychangers based in Dar es Salaam, Tanzania and Pemba. Money is paid in Chinese renminbi into designated accounts in China and transferred to the local moneychangers who then provide the cash for collection in dollars. While deposit amounts vary depending on relationships between traders, for this three-tonne order of tusks the deposit would have been \$450,000, with the balance paid once the Bill of Lading for the shipment was received. Xie referred to the role of the local accomplices as a “dragon service”, encompassing everything from collecting the ivory to paying off customs officers.

By April 2016 the Tanzanian accomplice, working with the Mozambican supplier, had gathered the requested three tonnes of ivory from elephants poached in southern Tanzania and northern Mozambique. The Shuidong group boarded a flight from Guangzhou and travelled to Pemba to oversee the final stages of selection, packing and shipping, arriving in town on April 6.

Every morning for two weeks, the group left town with the Tanzanian driver,

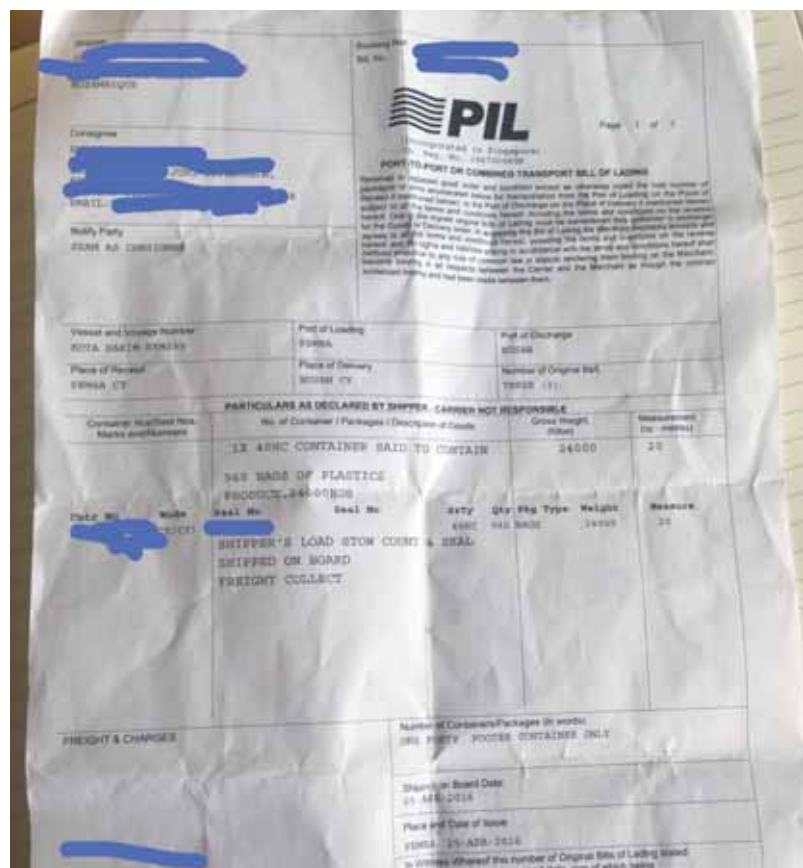
returning late in the afternoon. During the inspection phase, they chose 2.3 tonnes from the assembled three tonnes, discarding 700kg as low quality or too small – the tusks were from very young elephants. The chosen tusks were then moved to a secure warehouse in Pemba and packed for shipping in a 40-foot container.

According to Xie, the choice of “filler” or legitimate goods to conceal the ivory is key and based on products that will not arouse suspicion at the point of export or import. The nature of the consignee’s business is also an important factor as this appears on the shipping documents.

For the Pemba shipment, the group opted for grey plastic pellets, weighing a total of 21 tonnes and worth about \$10,000. This was because the co-investor from Hong Kong, Nan-Ge, owns a plastics products factory based in Shunde, Guangdong, which produces items such as buckets made from pellets. With a track record of importing plastic pellets into Hong Kong, neither the paperwork nor the destination of the consignment was likely to raise any red flags under customs risk assessment procedures. The choice of filler is so important that Xie had to source the plastic pellets from a factory in Dar es Salaam, since they could not be sourced in northern Mozambique.

BELOW:

A copy of the PIL Bill of Lading for the shipping container of 2.3 tonnes of ivory from Pemba to Hong Kong. Key details of the container, including the sender are concealed.



The routing of the container is another vital factor in minimising the risk of interception. Direct transport from Africa to China is considered too great a risk, so transit ports are used to disguise the origins of the shipment. As Xie explained: “The goods can’t come directly from Africa. They must first go to Singapore or elsewhere. There must be a transit point. If they came directly from Africa, they would definitely check the container.”

Another tactic is to “switch” the Bill of Lading for the consignment during the journey. This method further hides the origin of the container and conceals the identity of the sender and recipient. The role of complicit freight agents involved in submitting documents for customs clearance along the route is also important in successfully moving the container to its final destination. Ivory smugglers who have set up trustworthy routes with accomplices at every stage are said to “own the road”.

BELOW:

Smugglers prefer to communicate sensitive information using WeChat due to its anonymity. Here, one of the smugglers, Xie, asks if the customs clearance agent EIA uses is capable of getting the plastic pellets that they normally use as fillers.



For the shipment out of Pemba, the Shuidong group planned to use the port of Busan, in South Korea, as the main transit point and where the Bill of Lading would be switched. They explained how the route was “owned” by Nan-Ge, who had used it on five previous occasions to smuggle contraband wildlife. Shuidong traffickers such as Ou often demand guarantee deposits of about 70 per cent of the wholesale market value for customs clearance of containers; in the case of the Busan agent and this container, however, no guarantee was given. The reason Ou agreed to this was because Nan-Ge was a 50 per cent joint investor.

Another key factor was the involvement of a Chinese freight forwarder operating in South Korea who specialises in arranging onward shipments of containers holding illegal wildlife products and even offers different rates depending on the species, ranging from \$45 per kg for pangolin scales to \$145 per kg for ivory. The export from Pemba was to be arranged by another trusted freight agent, the same Mozambican who had worked with Xie’s Tanzanian associate to collect the ivory.

By April 23, the tusks were packed in the shipping container and Xie had received the Bill of Lading from the Mozambican agent. Such was the confidence of the suppliers’ ability to export the investment securely, all agreed that should the shipment be seized, the Mozambican and Tanzanian suppliers would compensate the Shuidong group for the full cost of the container.

The remaining balance owing to the local accomplices for the “dragon service” was paid and the Shuidong group flew back to China to await delivery. On April 25 at Pemba port, the container was loaded onto the vessel Kota Hakim, owned by Pacific International Lines (PIL) shipping company. On the Bill of Lading the contents of the 40-foot container, also provided by PIL, were described as “960 bags of plastics”. The port of delivery was listed as Busan.

Yet despite the meticulous planning a problem occurred along the route – not as a result of enforcement action but due to problems with the freight agents. After passing through the ports of Mombasa, in Kenya, and Singapore unhindered, the container arrived at Busan in late June. The intention was

ENFORCEMENT GAPS

Ivory traffickers rely on the active cooperation or exploitable ignorance of people from a variety of professions - a vital support network which includes corrupt rangers, customs officers, shipping agents, money changers, lawyers and local fixers.

The paperwork from a seizure can support further investigation. Following the interception of an ivory consignment in Thailand in 2015, African and Asian enforcement networks met and developed leads from the shipping documents.¹⁸ Investigations spanning six countries resulted in the arrests of Government and shipping officials in Kinshasa, Democratic Republic of the Congo.¹⁹

In 2014, the 'fee' to ensure non-inspection of cargo by customs in Tanzania was said to be \$70 per kg.²⁰ Following containerisation, shipping agents also play a central role - either through active conspiracy or lack of due diligence processes. Zanzibar's quick cargo clearance and feeder lines to Asia have enabled Shuidong smugglers to traffic large quantities of ivory to China, while the names of many freight agents from the island also appear regularly on shipping paperwork in place of the true cargo owners.^{21,22}

In the aftermath of a seizure, freight agents are often early targets for enforcement enquiries, but with varying outcomes. In Togo, a shipping agent was sentenced to two years in prison and fined CFA 25 million (\$42,000),²³ whereas in Malaysia, despite its well-known role as a transit country,²⁴ there have been no convictions related to any seizures of maritime ivory cargoes in recent years.²⁵

After one of the Shuidong group's shipments concealed in tea was seized in Singapore, the identified freight forwarder

was sanctioned \$5,000 for failing to exercise due diligence,²⁶ which appears to be Singapore's maximum sanction for similar cases.²⁷ The Singaporean authorities later crushed the seized ivory,²⁸ around the same time as the Shuidong traders were coordinating their next ivory collection in Nigeria.

Shipping lines are also open to abuse. In 2016, the Shuidong group used the Singaporean shipping line Pacific International Lines (PIL) to transport its Mozambican shipment; ivory traffickers shipping from Mombasa in 2013 also used the same line.²⁹

Criminals make use of financial services to pay for poaching and ivory collection and for cargo logistics, sometimes in instalments. State-owned and commercial banks may have limits on international transfers as a preventative measure against money laundering and some are in the process of developing risk indicators for wildlife trafficking.

The Shuidong group therefore uses wire payments via a Tanzania-based money changer to help finance poaching. Payments for the successful delivery of a shipment of ivory are made directly into a bank account in China in cash, thereby side-stepping bank warning systems. Financial investigation techniques, which identify money flows, lifestyle and legal assets connected to such criminal enterprises, are currently under-used methods.

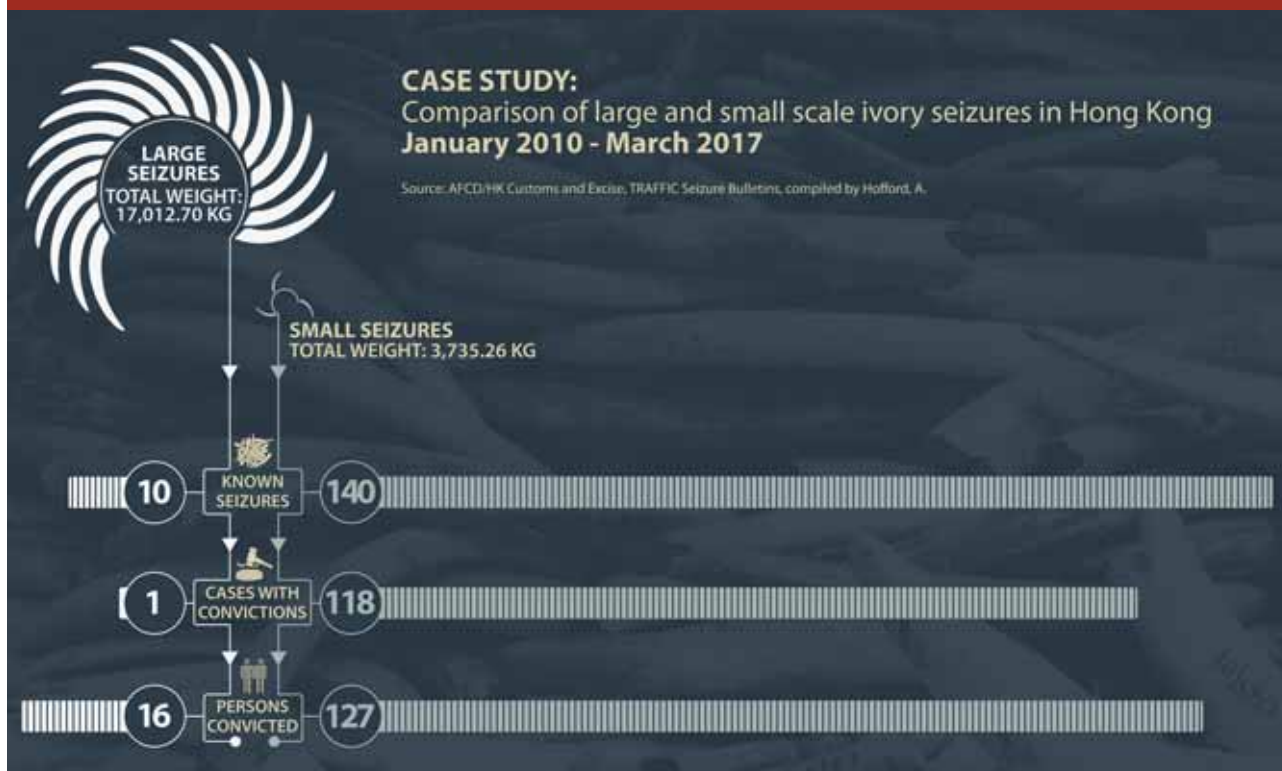
for the crooked freight agent to issue a new Bill of Lading, which would break the route, and move the container on to Hong Kong. But the shipping agent in Pemba had made a crucial mistake in the original paperwork, listing Hong Kong as the ultimate destination rather than Busan.

This aroused the suspicions of the PIL office in Busan because the route via Busan between Singapore and Hong Kong did not make sense; the company refused to ship the container to Hong Kong. This resulted in the container being moved to a secure location in the port and the contents reloaded into a new container for delivery to Hong Kong by another shipping line. During this process, the freight agent employed by Nan-Ge realised the consignment was in fact ivory tusks and not pangolin scales for which he had received a lower fee. Nan-Ge had to fly out to placate the

agent and pay him the proper smuggling fee due for ivory.

After the unexpected delay, the repacked shipment finally reached Hong Kong in mid-July; customs cleared what appeared to be a routine shipment of plastic pellets from South Korea. The container was stored in a warehouse owned by Nan-Ge until an opportune moment arose to move it into the mainland. By late September it had finally arrived in Shuidong, having been shipped from Hong Kong to Shanghai. Ou picked it up himself and drove it south.

All shipments of ivory tusks successfully smuggled by the Shuidong syndicates eventually reach their home base for secure storage while buyers are contacted. According to Xie and Ou, most of the purchasers come from the main ivory carving centres of Putian and Xianyou



ABOVE:
Much of the illegal ivory that enters China makes its way to Xianyou in Fujian province, where it is carved into finished products. The above photo was taken in Baxia village in Xianyou in August 2013.

in Fujian Province. Ou boasted of being well known among the underground network of illicit ivory traders in Fujian and of having a long client list. These traders are usually informed of incoming ivory shipments in advance, with sales normally completed within four days of arrival. Generally, the Shuidong smugglers sell only wholesale amounts in tonnes and not smaller volumes.

Once alerted to the arrival of new materials, the Fujian traders travel to

Shuidong to view the tusks and pay the agreed amount in cash. According to Ou, the average sale price for good quality tusks was about RMB5,000 (\$750) per kg, compared to RMB10,000 (\$1,500) at the height of illegal ivory seizures in 2012. For the Shuidong syndicates, their role in smuggling ivory tusks across international boundaries and into China is a lucrative speciality, with a consignment of three tonnes netting a profit of RMB20 million (\$3 million) during the peak years of the trade. The price agreed and payment made, the Fujian buyers would load the tusks into a fleet of SUVs for onward transport. Xie estimated that buyers make a profit of RMB500 (\$75) per kg selling the tusks onto carving factories.

In October 2016, EIA's investigators were invited to Shuidong to view the ivory tusks which had recently arrived after the long journey from Pemba. Ou's motivation for breaking his usual habit of dealing only with a closed group of buyers from Fujian was his desire to arrange a quick sale so he could reinvest some of the profits in another consignment of ivory. This practice of continuous 'recycling' income from one sale into another load of tusks ensures a virtually continuous flow of goods and indicates the scale of smuggling in which the Shuidong traffickers are involved. Xie also revealed that the group's usual buyers from Fujian

already had considerable stocks in hand and so were not interested in the Pemba tusks at the asking price.

Upon arrival in Shuidong, EIA investigators met with Ou and Xie for lunch and one more round of vetting. Ou and Xie initially appeared pensive at the prospect of bringing outsiders into their trusted circle but gradually relaxed and, convinced a lucrative deal would take place, agreed to an inspection.

Initially planned for early evening, the viewing was postponed until after midnight due to a family bereavement in the house where the tusks were stored, necessitating removal to another location. At about midnight, Ou finally picked up the EIA investigators from Shuidong, insisting for security reasons they all travel in his vehicle rather than follow behind in their own.

As the group travelled to the outskirts of Shuidong, the town lights gave way to pitch dark. All the passengers could tell was that they were driving through an area of forestland, along increasingly narrow and winding roads. After a 20-minute journey, they arrived at Baishitang. Exiting the car outside a two-storey house, the investigators were surprised to be greeted by Wang Kangwen, who they had not seen since their first encounter in Pemba in April. It appeared Wang also had family connections to the village since some of his relatives were keeping watch outside.

The group entered the darkened house, moved into a lit side room where the tusks were stored and got down to business. Ou explained he had moved 500kg of the best quality tusks from the previous location and Wang confirmed that none of the 2.3 tonnes shipment had yet been sold. The tusks were laid out on the concrete floor: there were approximately 100 whole tusks, ranging from 90-120cm long.

Ou wanted a price of RMB5,100 (\$750) per kg for the good quality tusks but was willing to sell the entire 2.3 tonnes from Pemba at a reduced cost of RMB4,000 (\$580) per kg: a total of more than \$1.3 million dollars. Wang assured the prospective buyers that if they bought the tusks it would be safe to transport them out of the area to other locations in southern China.

Wang claimed he regularly moved ivory between Shuidong and the city of Shenzhen and had never experienced any problems, explaining that he routinely used a regular Toyota family van and advising which roads were preferable for the journey to Shenzhen. He even offered to escort the 'buyers' for part of the journey, saying he was 98 per cent confident of success. As Ou had earlier said, in 20 years of ivory trading there had been no incidents of ivory being seized by authorities in the Shuidong area.

BELOW:

In October 2016, after months of negotiation, EIA investigators finally convinced Wang and Ou to show them part of the 2.3 tonne ivory shipment they had arranged back in April 2016.



IVORY SEIZURES LINKED TO THE SHUIDONG GROUP



- 1 2.4 TONNES OF TUSKS** seized in Hai Phong, Vietnam, October 22, 2013, concealed with seashells

Consignment believed to originate in Zanzibar, Tanzania. Transported via Malaysia to Hai Phong.

Consignee: Cong Ty Co Phan Hoang Gia Exim. Container was due to be re-exported to China via the Lang Son border crossing. Two other seizures of ivory concealed by seashells occurred at Hai Phong Port around the same time.

No known arrests connected to this case.

- 2 2.9 TONNES OF IVORY** seized in Zanzibar, Tanzania, November 13, 2013, concealed with seashells

Believed to be linked to the Hai Phong seizure (*above*). Container due to be loaded onto PIL vessel Kota Hormat and shipment bound for the Philippines.

Consignor: Island Sea Food Co Ltd, Mtoni, Zanzibar
Consignee: Trison Trading, Cebu, Philippines

Six individuals in Zanzibar linked to the attempted export arrested. Prosecution on-going. Two Chinese suspects fled Tanzania.

- 3 3.7 TONNES OF IVORY** seized in Singapore in two containers, May 19, 2015, concealed with tea leaves and shipped from Mombasa

The Shuidong group told EIA investigators that the container was going to be inspected because of an earlier seizure of ivory tusks in Thailand which had also departed from Mombasa and was concealed with tea leaves. "We had people in Singapore, a customs clearance company ... we were told that the container had to be opened ... that containers carrying tea leaves from Kenya Mombasa ... all had to be opened."

Consignor: Almasi Chai Kenya Ltd, 92217-80100, Mombasa, Kenya
Original consignee: Keshav Traders, Dubai, UAE
Final consignee: FAF Flying Transportation Pte Ltd, Singapore

In Singapore, the freight forwarder was sanctioned \$5,000 for failure to exercise due diligence. In connection with the linked Thai case, at least nine individuals were charged in one case in Mombasa under six laws and assets frozen,³⁰ with further arraignments reported;³¹ cases on-going.

SWITCHING SOURCES

A few months later, Ou contacted EIA again, offering a consignment of tusks from Nigeria; they must have sold the ivory smuggled from Pemba. At the time of the viewing in October, Ou had revealed his plans to switch sourcing from East Africa to Nigeria, saying he needed to transfer RMB2.5 million (\$365,000) across to his contacts there to begin collecting a new batch of tusks from the region.

The main reason for the change in operations was the diminishing profitability of trafficking ivory from East Africa (savannah elephants). According to the Shuidong group, “yellow materials” from West and Central Africa (forest elephants) can be sold for an average of RMB6,000 (\$900) in China, compared with RMB5,000 (\$750) for the best quality “white” or savannah ivory.

According to the traders, four years previously, “white” ivory could fetch RMB10,000 (\$1,500) per kg; while still profitable, by early 2015 they were looking at RMB7,000 (\$1,000).

Although the costs of sourcing and logistics on the ground were broadly similar – the Bill of Lading price in Nigeria was \$340 per kg during June 2016 compared with \$300 in Mozambique – the group was unable to force the supply price down in East Africa, so Ou turned his sights towards Nigeria. By early 2017, the Bill of Lading costs in Nigeria had fallen to \$300 per kg.

Given increased enforcement effort and the high-profile arrests and prosecutions of Chinese nationals in their former sourcing area of Tanzania, lax enforcement and corruption in Nigeria was another reason for the change. Speaking of the events in Tanzania, Ou said: “In East Africa, only in Mozambique can these things still be moved out; it’s not possible in any other place. West Africa is easy.”

To smuggle out of Nigeria, Ou had forged a new partnership with two Chinese from Fujian who were based in Lagos. One of them had a main business supplying rosewood timber out of Africa, providing a useful cover for ivory smuggling. Ou explained that as well as owning a timber yard, that they had access to a facility where ivory tusks could be safely stored.

“YELLOW MATERIALS ... THE PRICE IS MUCH HIGHER”

The Shuidong syndicate made several mentions of “yellow” ivory or materials from West and Central Africa, stating this ivory could be sold for nearly \$900 per kg in China. This is \$150 more than the price for “white” ivory from East and southern Africa.

Traffickers made a clear distinction between the two types, describing the different colour and shape of “yellow” ivory and its source in Africa. This ivory is most probably from forest elephants, which are found only in the tropical forests of West and Central Africa.

Nigeria and Cameroon were mentioned as two countries where forest elephant ivory could be obtained. Both have experienced massive declines in their elephant numbers^{32,33} so it seems likely that this ivory is being sourced from forest elephant populations in the nearby countries of the Central African Republic, Gabon and the Democratic Republic of the Congo.

Forest elephants number far fewer than the better-known savannah elephants of eastern and southern Africa.³⁴ Also threatened by the loss of tropical forest, any increase in the trade of forest elephant ivory will have a significant impact on the survival of this species.³⁵

The operations of this and connected criminal networks in West and Central Africa are a direct threat to this species.



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TOP:

Due to a price drop in savannah elephant ivory in China, the smugglers turned their attention to forest elephant or “yellow” ivory. Xie sent the photograph of this yellow ivory that was being collected by the Shuidong traders in Nigeria to convince EIA investigators to jointly invest in their operation.

ABOVE:

Lagos port, Nigeria.

Ou claimed to have built good financial relationships with customs officers in Lagos port; once the ivory tusks were ready to be shipped, corrupt customs officers would come to weigh them, charging a fee of \$30 per kg to ensure the container was not inspected.

As part of his Nigerian venture, Ou also recruited Wang as a partner. Ou was in dispute with the Hong Kong businessman Nan-Ge over the problems encountered in Busan during the transport of the ivory consignment from

Pemba. Ou claimed Nan-Ge had lied to him over the fee for the freight agent in South Korea, cheating him out of RMB1 million (\$145,000). Ou and Wang would collectively invest 50 per cent in the shipments out of Nigeria, with the associate from Fujian investing the other half. Xie was not involved because his contacts and suppliers are limited to East Africa; however, he received a fee of RMB450,000 (\$65,000) for his role in the Pemba shipment.

In addition to ivory tusks, Ou also planned to expand his illicit wildlife business to include pangolin scales, a lucrative sideline in the world’s most trafficked mammal.

Ou’s new Nigerian venture was soon in full swing; by the middle of February 2017 he sent EIA pictures of tusks, which had been consolidated in Lagos. Shortly afterwards, Wang was despatched to Nigeria to inspect the ivory and, by the following month, about three tonnes of ivory and pangolin scales had been packed in a consignment of peanuts ready for despatch to Shuidong.

HOW TO SMUGGLE IVORY TUSKS: Lessons from the Shuidong syndicates

The Shuidong group's success results from a blend of risk management and market adaptation. Other Shuidong inhabitants have a history in ivory trade and, having inherited the business from older relatives, the group relies on familial ties and trust.

Their methods, which help explain why there has never been any enforcement action, include:

"Commodity" sourcing

Ivory traffickers need to choose an area where elephants are found and can be poached. It would therefore make sense to focus on countries with elephant populations, such as Botswana, home to the largest elephant population in Africa.³⁶ However, Botswana has experienced relatively little elephant poaching and has not been targeted by the group. This is due to a second key factor – the ease of engaging in illicit business. Botswana has relatively good governance and is one of the least corrupt countries in Africa.³⁷ Instead, the Shuidong traffickers prefer to source from countries where the rule of law is weak. Despite having a population of only 9,600 elephants,³⁸ Mozambique is attractive to the group as it is one of the most corrupt countries in Africa.³⁹

Supply chain management

Transporting supplies of illicit goods around the world requires a safe route with trusted accomplices operating along the way. The Shuidong group refers to this as "owning the road". If a route is broken as a result of enforcement action, operations have to be disrupted as new allegiances are forged. The route used by the group for the Pemba shipment remains unbroken, with the complicit freight agents at key stages along the chain having a clean record of zero shipment interceptions.

Specialisation

The Shuidong syndicates focus on a single part of the illicit ivory supply chain – the smuggling of raw tusks from Africa for the wholesale market in China. This has a number of advantages. It is the most lucrative part of the chain; the biggest single mark-up in the price of an ivory tusk occurs when it is moved onto the Chinese mainland. Focusing on wholesale trade to trusted buyers also ensures a low profile, compared to those involved in operating carving factories or retail outlets. One of the largest seizures of tusks in China in recent years led to the prosecution of a Fujian-based businessman who owned an ivory-carving company and retail outlet registered with the Chinese Government. He sought to diversify by directly sourcing tusks from several African countries and was caught. His lack of expertise in smuggling tusks, as well as a proactive enforcement effort, led to a 15-year prison sentence.⁴⁰

RIGHT:

A luxury mansion in Lipuzai village in Shuidong town belonging to Xie Yingjue, a prolific ivory trafficker, who was previously based in Tanzania. He has since retired and handed over his contacts to Xie Xingbang, his nephew.

Spreading the risk

It is rare for a single Shuidong smuggler to shoulder the entire risk of an ivory consignment. Instead, they seek investors to mitigate any loss should the ivory be intercepted. The proceeds of most shipments are split two or three ways. While a seizure can lead to lost income, this is generally only a temporary setback because the loss has been shared. This investment model also allows for the rapid recycling of funds, with some of the profit from a successful shipment being quickly invested in another consignment, continuing the cycle.

Avoiding direct contact

The Shuidong group normally avoids direct contact with the ivory, preferring to pay locals to do the dirty work of collecting, collating and storing the tusks. One exception is when the traffickers inspect the tusks prior to despatch, but this is conducted under tightly controlled conditions. In most of the cases of Chinese nationals being successfully prosecuted for ivory trafficking in Africa, the culprits were apprehended in physical possession of the tusks; three Chinese nationals were arrested in Dar Es Salaam, Tanzania, in 2013 in the act of packing tusks weighing 1.8 tonnes at a residential property.⁴¹ Two of them were sentenced to 30 years in prison.



THE ROUTE FOR THE 2.3 TONNES OF IVORY TRAFFICKED FROM PEMBA, MOZAMBIQUE TO SHUIDONG, CHINA IN 2016.

ROUTE:

- 1 From Pemba (Mozambique)
By sea to Busan (South Korea)
Ivory consolidated from across
eastern and southern Africa,
including Mozambique and Tanzania

COSTS AND PAYMENTS:

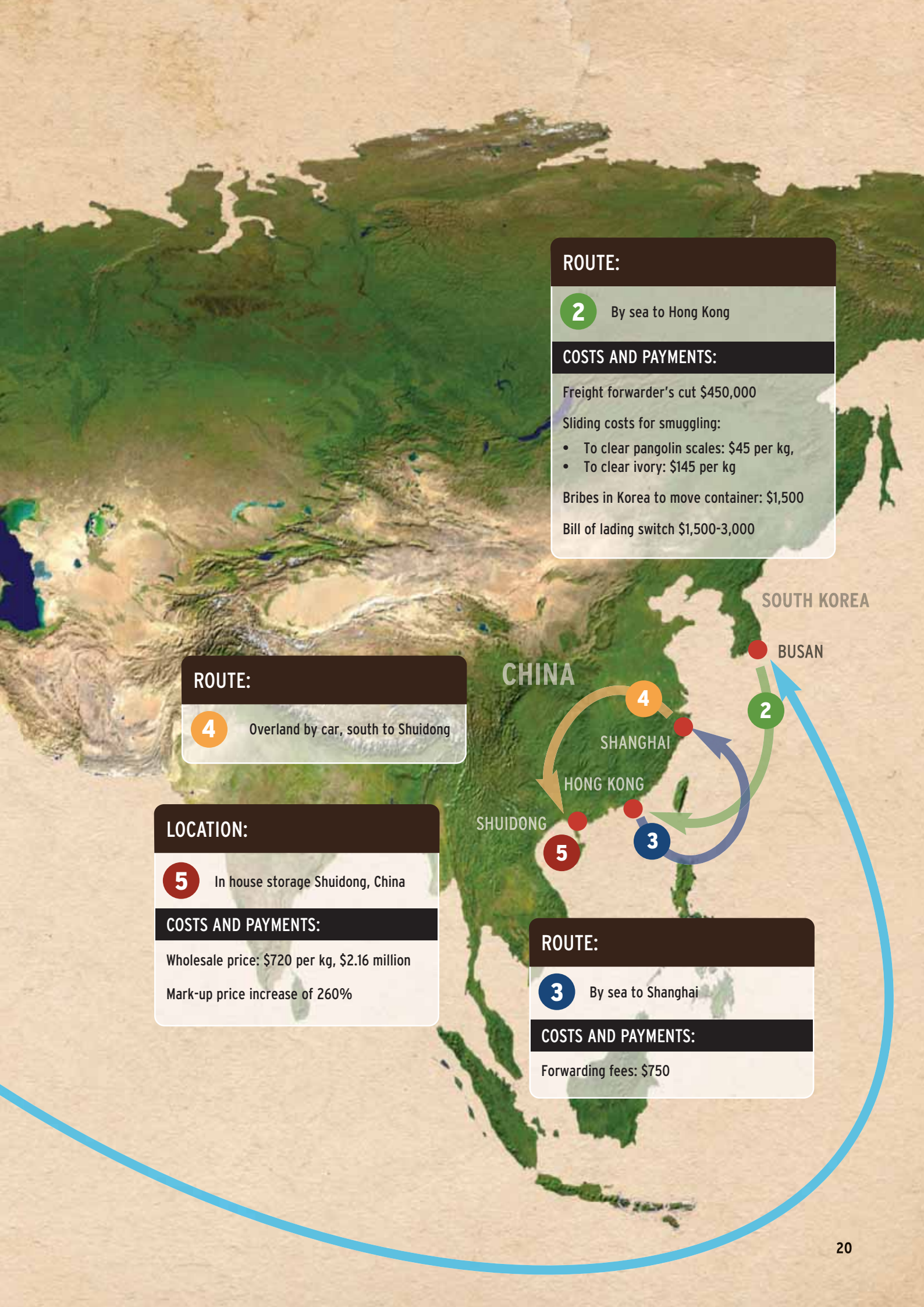
\$200 per kg raw ivory

Increase to \$300 per kg ivory + Bill of Lading
(total \$900,000 for 3 tonnes)

\$7,500-10,000 for container "fillers"
(plastic pellets)

PEMBA
MOZAMBIQUE

1



ROUTE:

2 By sea to Hong Kong

COSTS AND PAYMENTS:

Freight forwarder's cut \$450,000

Sliding costs for smuggling:

- To clear pangolin scales: \$45 per kg,
- To clear ivory: \$145 per kg

Bribes in Korea to move container: \$1,500

Bill of lading switch \$1,500-3,000

ROUTE:

4 Overland by car, south to Shuidong

LOCATION:

5 In house storage Shuidong, China

COSTS AND PAYMENTS:

Wholesale price: \$720 per kg, \$2.16 million

Mark-up price increase of 260%

ROUTE:

3 By sea to Shanghai

COSTS AND PAYMENTS:

Forwarding fees: \$750

SOUTH KOREA

BUSAN

CHINA

SHANGHAI

HONG KONG

SHUIDONG

RECOMMENDATIONS

THE GOVERNMENT OF CHINA:

- Deploy targeted multi-agency specialised investigations to identify and disrupt networks engaged in the illegal ivory trade in Shuidong, and connected groups and buyers in Putian, Fujian province and beyond
- Employ a range of laws related to tax, anti-money laundering, anti-corruption and organised crime to collect evidence for asset seizures and criminal prosecution
- Coordinate intelligence-led operations targeting Chinese nationals operating in and between source and transit countries featured in this report
- Follow through on commitments made to close commercial ivory trading and processing by the end of 2017. Publicise it and prosecute individuals and companies found to be in violation of the ban. Clarify and, if necessary, amend the potential loophole, which may allow for the legal trade in antiques or 'cultural relics'
- Remove the existing legal quota system for pangolin scales to restrict alternative revenue streams for criminal syndicates and to support the CITES Appendix 1 listing

THE GOVERNMENTS OF MOZAMBIQUE, NIGERIA AND TANZANIA:

- Investigate criminal activities detailed in this report and exchange information with Chinese authorities
- Combat trafficking at exit ports: review current procedures; strengthen capacity; improve detection methods and employ anti-corruption measures

THE GOVERNMENTS OF ALL COUNTRIES IMPLICATED IN THIS REPORT:

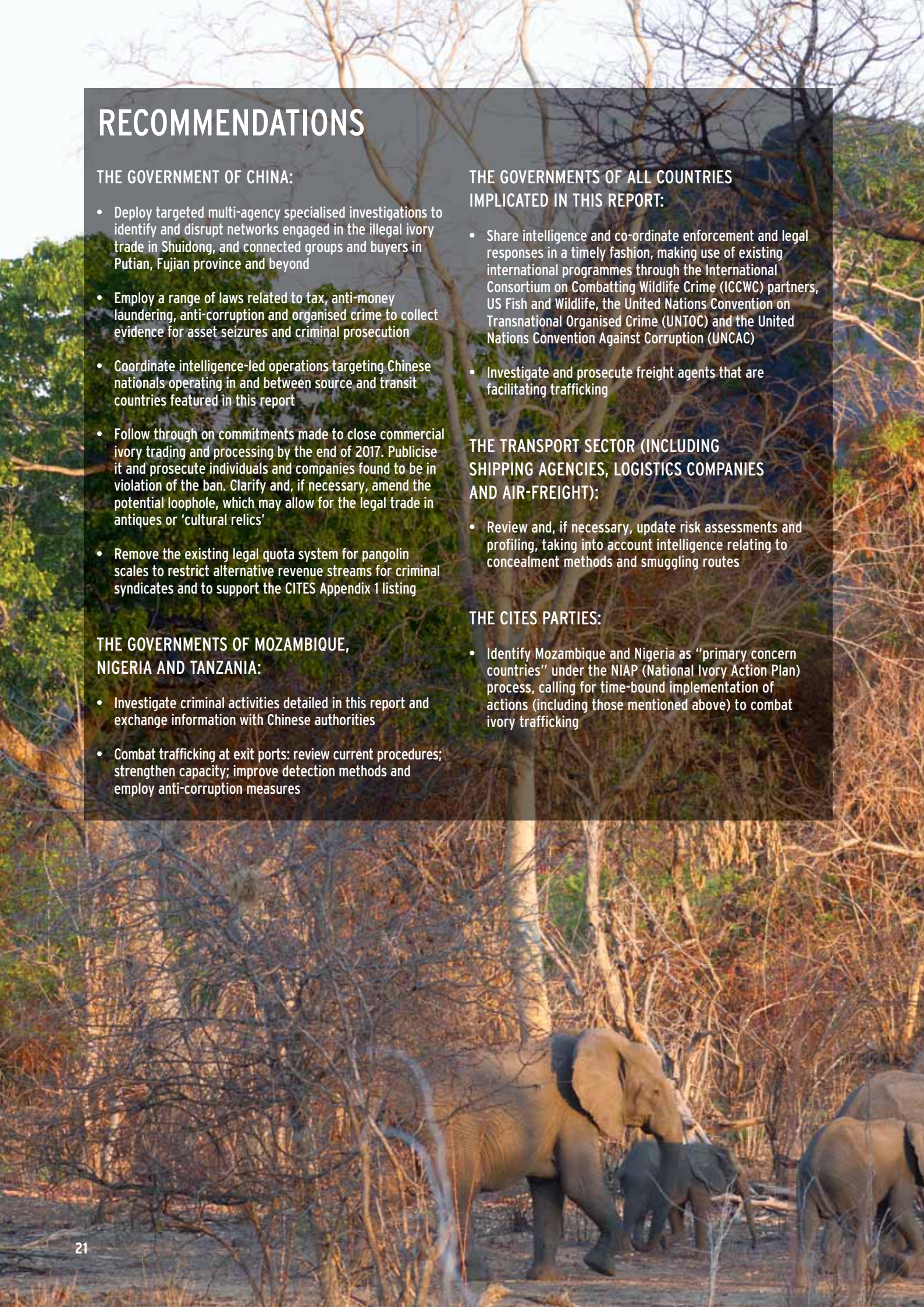
- Share intelligence and co-ordinate enforcement and legal responses in a timely fashion, making use of existing international programmes through the International Consortium on Combatting Wildlife Crime (ICWC) partners, US Fish and Wildlife, the United Nations Convention on Transnational Organised Crime (UNTOC) and the United Nations Convention Against Corruption (UNCAC)
- Investigate and prosecute freight agents that are facilitating trafficking

THE TRANSPORT SECTOR (INCLUDING SHIPPING AGENCIES, LOGISTICS COMPANIES AND AIR-FREIGHT):

- Review and, if necessary, update risk assessments and profiling, taking into account intelligence relating to concealment methods and smuggling routes

THE CITES PARTIES:

- Identify Mozambique and Nigeria as "primary concern countries" under the NIAP (National Ivory Action Plan) process, calling for time-bound implementation of actions (including those mentioned above) to combat ivory trafficking





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