

Wildlife

Off the Hook

The need for transparency
and accountability in tackling
wildlife crime

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Above: Since 2008, there has been a growing increase in the inter-continental trafficking of pangolin scales from Africa to Asia

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ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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CONTENTS

Executive summary and recommendations	4
Introduction	6
Methodology for the collation of seizure and prosecution data	7
1. Lack of reporting and transparency	8
2. Legislative loopholes in tackling wildlife crime	10
3. Failure to investigate financial flows	11
4. Targeting corruption and higher levels of wildlife crime networks	12
5. Lack of international collaboration	14
Footnotes and references	16



Executive summary and recommendations

Tackling wildlife crime, stepping up anti-corruption efforts and enhancing access to information and justice are key to achieving the United Nations Sustainable Development Goals. Legislation and law enforcement are powerful behaviour-change mechanisms for reaching these targets, which should be constantly evaluated and improved.

EIA recommends the use of specific indicators to evaluate progress and identify key gaps in global efforts to end wildlife crime and was a partner in the development of the Indicator Framework for Combating Wildlife and Forest Crime, produced by the International Consortium on Combating Wildlife Crime (ICCCWC). This includes identifying legislative loopholes and measuring progress by analysing the law enforcement outcomes following wildlife seizures.

EIA maintains a comprehensive database of global wildlife seizures of Asian big cats, elephants, pangolins and rhinos and monitors the progress of key countries implicated in wildlife crime.

It has been encouraging to see governments stepping up their efforts in recent years to amend laws and make seizures to better address wildlife crime; however, seizures should not be seen as the end of the process but, rather, the opportunity to conduct follow-up investigations to disrupt wildlife crime networks.

Above: butchered tiger offered for sale by Vietnamese traders on social media

Following are five key takeaways from EIA's analysis and research related to ongoing efforts to tackle wildlife crime.

1. EIA was unable to identify any prosecution outcomes for a significant majority of the wildlife seizures we have recorded. While this is likely an underestimate of actual prosecution outcomes, it highlights serious concerns about the lack of transparency regarding law enforcement efforts to tackle wildlife crime. It is evident that for the majority of seizures, there are no effective follow-up investigations and, in rare cases where these have taken place, law enforcement results are not easily accessible to the public. While there tends to be media interest at the time of a seizure, sustained coverage and follow-up on these incidents is lacking.

EIA recommends that governments improve reporting on law enforcement outcomes related to wildlife crime and enhance transparency of judicial proceedings; for example, by establishing free online public platforms of court records and case laws. Media should be more proactive in reporting beyond seizures and persisting with inquiries about follow-up investigations, particularly with regard to important large-scale seizures.

2. Weak laws have hindered an effective response to wildlife crime. For example, ambiguous legislation creates confusion regarding the mandate of key law enforcement authorities to investigate wildlife crime and to treat it as a serious crime.

EIA recommends that relevant laws be amended to treat wildlife crime as a serious crime as defined by the United Nations Convention against Transnational Organized Crime (UNTOC). The statutory role and mandate of relevant agencies to tackle wildlife crime should be clarified so they are empowered to conduct effective investigations to address wildlife crime.

3. Countries which apply financial investigation tools are likely to be significantly more successful in disrupting wildlife crime networks and securing proportionate penalties.¹

EIA recommends implementation of the recommendations presented by the Financial Action Task Force (FATF) in its first global report on illegal wildlife trade published in June 2020.² This includes recognising illegal wildlife trade as a predicate offence for money laundering and deploying financial investigations and intelligence as routine best practice to collect evidence and, where possible, seize the proceeds of crime.

4. The individuals arrested at the scene of a seizure are often poachers or couriers. Law enforcement actions tend to focus on the lower levels of the trade chain, on individuals who are generally far removed from the network's larger operations. Such narrow enforcement efforts highlight significant missed opportunities to dismantle wildlife crime networks by investigating those offenders operating at higher levels as well as corrupt government officials facilitating wildlife trafficking.

EIA recommends that law enforcement efforts prioritise the key drivers of wildlife crime networks, including corrupt government officials. Anti-corruption efforts are pivotal including comprehensive corruption-risk assessments and providing resources to overcome those risks identified. Sentencing guidelines should be considered to ensure penalties imposed are fair and proportionate; for example, in some instances, the seizure of illegal profits and assets may be more appropriate and serve as a better deterrent.

5. Although there is widespread recognition that wildlife trafficking is often a transnational organised crime, there is limited international co-operation when it comes to disrupting networks operating across borders, despite almost every country in the world being a member of international and regional law enforcement networks such as INTERPOL and the World Customs Organisation (WCO).

EIA recommends that existing mechanisms are proactively used to strengthen international collaboration which can lead to the effective dismantling of transnational trafficking networks.

Introduction

Illegal wildlife trade (IWT) is a serious organised crime involving networks operating across borders.

Combatting it is beyond the scope of any single agency or government and requires the engagement of enforcement agencies, prosecutors, judiciary, media, inter-governmental bodies and the ordinary citizens.

Wildlife trade is also a threat to public health as people are exposed to wildlife along the trade chain. This type of exposure amplifies the risk of zoonotic disease outbreaks such as COVID-19, SARS and Ebola. We recognise that pandemics disrupt the normal functioning of law enforcement and judicial proceedings, with resources relocated and criminal justice processes delayed.

Despite the pandemic, there continues to be progress in tackling wildlife crime; for example, the Lin syndicate, one of the most prolific wildlife trafficking groups in southern Africa, was sentenced to a total of 56.5 years' imprisonment in Malawi in July 2020.³

Legislation and law enforcement are powerful tools which should be constantly evaluated and improved to effectively tackle IWT. To evaluate their impacts, EIA has conducted research and analysis to identify five key gaps which should be addressed.

Below: In June 2020, three traffickers were arrested in Cameroon with 380 kg pangolin scales



©The EAGLE Network



©Nigeria Customs Service

Methodology for the collation of seizure and prosecution data

EIA regularly collects and analyses records of the seizures of illegal products of Asian big cats,⁴ elephants, pangolins and rhinos.

The open source data we draw on include Google searches using species name/product name plus the search term "seizure". We exclude incidents reported as anecdotal without credible information. Additional sources include law enforcement agency reports and news releases, court verdicts, inter-governmental agency reports.

Our sources also include information shared by reliable non-governmental sources including ADM Capital Foundation, Conserv Congo, EAGLE Network, Education for Nature Vietnam, Fauna and Flora International, Freeland, Lilongwe Wildlife Trust, NABU, Natural Resource Conservation Network, Robin des

Bois, TRAFFIC, Wildlife Conservation Nepal, Wildlife Conservation Society, Wildlife Friends Foundation Thailand, Wildlife Trust of India, WildTiger, WildTeam and the Wildlife Protection Society of India. We have also received support from Hogan Lovells in open-

source mining of court verdicts for ivory seizures in 12 jurisdictions.⁵

Our records are subject to certain limitations, such as reporting rates, data accessibility and language barriers. Thus, the quantitative data presented should be treated as an indication based on accessible information rather than of absolute value.

Further, as a small non-governmental organisation, our capacity to collate information on seizures and prosecutions globally is limited. We welcome any input and proactively conduct outreach to update our databases. For example, in 2020 we shared seizure data with 183 world governments which are Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), requesting their feedback.

Above: EIA analysis of wildlife seizures globally present a worrying picture of failure by world governments to tackle transnational wildlife trafficking



1. Lack of reporting and transparency

As of the end of January 2021, EIA's database has recorded 7,903 seizures globally of Asian big cats, elephants, pangolins and rhinos.

While 4,694 (59.4 per cent) of these seizures involved the arrest of one or more suspects, EIA has not been able to identify any prosecution results for a large majority of the seizures.⁶ Due to data limitations, this is likely an underestimate of seizure outcomes; however, it underscores the need for transparency and open access to criminal justice.

Above: Governments are failing to ensure transparency related to wildlife crime cases and open access to criminal justice records

Under the CITES framework, Parties are required to report annually on seizures and law enforcement outcomes such as arrests, laws under which charges were brought, sanctions imposed and disposal of seized specimens. Unfortunately, these reports are not available to the public.⁷

In some cases where arrests are made, offenders may avoid prosecution by paying a fine. For example, in Nigeria, according to a 2018 report of the Government of

Nigeria, at least eight ivory seizure cases were settled out of court through payment of an administrative fine. In addition, several cases resulted in the release of the suspect or acquittal due to insufficient evidence, highlighting the need for strengthening investigations to collect compelling evidence.

In several IWT hotspots, such as Nigeria⁸ and Laos,⁹ there are limited reports of seizures and even fewer reports of court outcomes. Two possible explanations for this include the lack of law enforcement effort in terms of seizures or prosecutions or, in rare cases where there are outcomes following seizures, the results are not easily accessible to the public. In the absence of such information, it is difficult to evaluate the implementation and impact of relevant legislation and to adopt improvements.

Some countries such as Kenya, Tanzania, China and India publish a selection of court verdicts on an open-access government platform.¹⁰⁻¹³ Verdicts provide

valuable insights into the investigation and prosecution procedures, the legal frameworks applied and sentences delivered on wildlife crime. However, EIA research shows that some online databases only publicise a selection of cases; the proceedings and outcomes of tribunals and lower courts in relation to seizures are often not included, or in some cases the authorities deemed them unsuitable for public access.

A number of NGOs, such as the EAGLE network in multiple countries in Africa, Wildlife Direct in Kenya, Education for Nature Vietnam and ADM Capital Foundation in Hong Kong, have made significant efforts to attend court hearings and publicise prosecution results after seizures. Nevertheless, it is in the public's best interest for governments to increase transparency on the criminal justice response to wildlife crime and for the mass media to be more proactive in reporting law enforcement actions – or the lack thereof – following wildlife seizures.

Case Study 1: Lack of follow-up action and transparency: Key examples of large-scale seizures¹⁴

Date	Country	Incident	Reported law enforcement outcomes
Jan – Jun 2016	Thailand	147 live tigers, the carcasses of 70 tiger cubs, 1,045 amulets made of tiger skin, tiger teeth and other products were seized at the Tiger Temple in Kanchanaburi.	None
13 Aug 2018	Malaysia	50 rhino horns, weighing about 116kg, were seized at Kuala Lumpur Airport. The shipment bound for Vietnam also included nine carcasses of what are believed to be tigers and bears, weighing around 200kg.	None
4 Oct 2018	Vietnam	More than two tonnes of ivory and six tonnes of pangolin scales were seized by Vietnamese authorities. The contraband was hidden in a plastic waste container at Tien Sa port in Da Nang. The container was originated from Nigeria.	None
25 Jan 2019	Vietnam	More than 500kg of ivory and over 1,500kg of pangolin scales were seized at the Dinh Vu port in Hai Phong. The goods were declared as wood, and came from the port of Apapa, Nigeria.	None
30 Jan 2019	Vietnam	1,300kg pangolin scales and 109kg ivory were seized by the Customs in Hai Phong. The shipment originated from Apapa port in Nigeria.	None
26 Mar 2019	Vietnam	9,120kg elephant tusks hidden in timber containers were seized by Da Nang Customs. This was the biggest ivory seizure in recent years. Preliminary investigations show that the containers were imported to Tien Sa from the Republic of Congo, Africa.	None
19 Jan 2020	Nigeria	9,504kg of pangolin scales were seized at Isheri Estate. The scales were found by the Nigerian Customs Service (NCS) and Federal Operations Unit in 147 sacks in an abandoned warehouse where two 20ft containers were stacked.	None
1 Apr 2020	Malaysia	6,160kg of pangolin scales were seized at Port Klang. The scales were hidden behind sacks of cashew nuts. The scales are worth an estimated \$17.9 million. The importer and customs agent involved were reported as under investigated.	None

2. Legislative loopholes in tackling wildlife crime

Wildlife crime is often viewed exclusively as an environmental issue despite its overlaps with organised crime and corruption.

The trafficking of wildlife is the world's fourth largest illegal trade after arms, drugs and human trafficking.¹⁵ IWT often involves other illicit commodities such as firearms and goes hand in hand with corruption, fraud, and money laundering.

The United Nations Office on Drugs and Crime (UNODC) recognises IWT as a serious crime, defined by the United Nations Convention against Transnational Organised Crime (UNTOC) as an offence punishable under law with imprisonment of four years or more.

In 2016, EIA reviewed the legislative frameworks of 15 key IWT countries and found almost all of them had adopted legislation with sufficient penalties that met UNTOC's penalty standard.¹⁶ In some countries, the legislation is in place but responsibility for investigation and prosecution is assigned to multiple agencies, which complicates coordination and resource allocation. Officers may be less motivated to act against wildlife trafficking if their roles and responsibilities in the investigation and prosecution process are unclear.

Case Study 2: Urgent need to amend the Organised and Serious Crimes Ordinance of Hong Kong SAR

In Hong Kong, wildlife crime offences are not included in the Organised and Serious Crimes Ordinance (OSCO) and are therefore not treated as serious crimes. The Protection of Endangered Species of Animals and Plants Ordinance was amended in 2018 with increased custodial and financial penalties, but most publicised cases received sentences far below the maximum.^{17,18}

Ivory, rhino horn, totoaba maw, shark fin, hornbills, turtles and other wildlife products are frequently seized in the city.

The Agriculture, Fisheries and Conservation Department (AFCD) has the mandate to investigate and prosecute offenders of wildlife protection laws. The Customs and Excise Department can investigate and prosecute wildlife smuggling, but hands most cases to the AFCD. While the AFCD is the enforcing body of CITES regulations, its expertise is not in crime investigation, and its resources for effective investigations are limited.

Since 2000, 34 large-scale seizures of pangolin scales and ivory have taken place in Hong Kong, representing 11 per cent of global large-scale seizures. None of them have led to prosecutions of the networks involved.

There is, however, an important initiative under way to list wildlife crime offences under OSCO, which will shift the responsibility for investigation and prosecution of wildlife crime from the AFCD to the Hong Kong Police Force, which it is hoped will facilitate more effective investigations into IWT.

Right: The record seizure of 8,300kg pangolin scales and 2,100kg ivory is just one example of the key role played by Hong Kong in IWT



©Customs and Excise Department of HKSAR

3. Failure to investigate financial flows

IWT is a financial crime.

Along the trade chain, criminal networks mobilise large sums of money through cash, bank or black-market transactions to fund the poaching, transportation and other offences related to wildlife crime. Once the contraband is moved to the consumer end, the trade generates vast profits.

The Financial Action Task Force (FATF), the international standard-setter in anti-money laundering actions, has concluded that the proceeds generated by IWT should be viewed as a global threat, not a problem for only those jurisdictions where wildlife is illegally harvested, transited or sold.²

Leaders of trafficking networks operate at a high level, often funding and profiting from the operations without coming into direct physical contact with the products. It is therefore very difficult to catch them red-handed in possession of illicit wildlife products. Thus, it is critical to investigate the financial flows associated with IWT to identify higher levels of crime networks and enable confiscation of illicit assets.

Below: Luxury mansion owned by a major ivory trafficker in Shuidong, southern China. Financial investigations must be used to follow the profits and identify criminals operating at higher levels of networks



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Case Study 3: The Shuidong syndicate¹⁹

EIA investigations between 2014-17 helped expose a prolific wildlife crime network originating from Shuidong, a town in southern China's Guangdong Province.

EIA identified Ou Haiqiang and Wang Kangwen as leading members of the gang, supported by Xie Xingbang. The three collaborated with close relatives and friends to source ivory from Tanzania and Mozambique, with South Korea and Hong Kong used as transit points for their shipments. The syndicate also traded in pangolin scales, rhino horns and totoaba maws.

When the Anti-smuggling Bureau (ASB) of China Customs made the first arrests of this network, only 159kg ivory and a small quantity of pangolin scales were seized – a mere fraction of the 8,445kg ivory and 796kg pangolin scales the network had previously trafficked from Africa.

The ASB conducted in-depth financial investigations to track the syndicate's illegal shipments and identify the proceeds of crime. To date, 25 individuals have been arrested, including the three individuals identified by EIA, and 21 are known to have been convicted. RMB4.7 million (ca \$731,381) was frozen by investigation authorities and later confiscated. Sentences ranged from three to 15 years in prison plus fines or confiscation of up to RMB3 million in personal assets.^{19,20}

The investigation into the Shuidong case also resulted in the disruption of other associated IWT networks, including the seizure of 323.7kg ivory and the arrest of 17 suspects.²¹

One of the difficulties faced by enforcement agencies is that the seizure of goods is often made without a suspect being present at the scene or with a suspect who has not been found in direct possession of contraband.

Despite good intelligence on the role of key figures in trafficking operations, without more robust forensic and financial investigations, evidence may be insufficient for arrests, the initiation of prosecution or conviction (such as the examples shown in Case Study 1). Using financial investigations and intelligence could help address this situation by providing compelling evidence, such as proof of payments made to transport illegal wildlife products.

Such evidence could be used to charge suspects with additional offences under anti-money laundering legislation, which can significantly boost the success of prosecutions and use of deterrent penalties, such as the confiscation of assets (money as well as property, vehicles etc purchased using the proceeds of crime).

IWT should be included as a predicate offence of money laundering, with governments setting clear mandates and allocating resources for enforcement agencies to investigate the financial flows associated with IWT.



4. Targeting corruption and higher levels of wildlife crime networks

Often, the individuals arrested at the scene of a seizure are low-rank couriers who have little contact with, or insight into, a network's operations.

A recent study in South Africa, published by TRAFFIC, suggests that individual poachers or transporters were driven into the role by the lack of material and social capital.²² Indeed, disproportionate sentencing of offenders such as poachers, at the lower level of the trade chain, will have little impact on the organisers of the network and may instead push poor and disadvantaged families further into destitution and criminality, sustaining a cycle of social instability.

Very few countries have guidelines for the sentencing of wildlife crime offenders, which can result in disproportionate penalties. For example, a fine of five million Nigerian Nairas (\$13,120) may be a huge sum for a poacher or a courier just trying to make ends meet for the family, but of no consequence to a network leader. Organisers of wildlife trafficking are also likely to have resources and corrupt contacts to evade law enforcement.

An effective intervention should target the individuals truly responsible for the crime, including corrupt government officials facilitating it. A review by the Wildlife Protection Society of India showed poor investigation and documentation were key factors in failure to prosecute wildlife crime in Maharashtra, India.¹⁰

The key role of corruption in hindering law enforcement is also demonstrated by the case relating to the Star Tiger Zoo, in Thailand, where the facility was found to be involved in illegal tiger and pangolin trade as well as money laundering for wildlife trafficking and other criminal activities. The Government of Thailand's Anti-Money Laundering Office froze some assets and proceeds of crime but although the zoo's owner was arrested twice and charged with money laundering, and despite compelling witness testimony and forensic evidence, the case never proceeded to prosecution; Government officials believe it will never be prosecuted, reportedly because the suspect is protected by local police.²³⁻²⁵

High-level political will and commitment at all levels of government is needed to tackle corruption and investment should be made in effective anti-corruption measures and improving safeguarding capacity, for example, to maintain the chain of custody and prevent evidence being tampered with.

Above: Despite the COVID-19 pandemic, courts in China continue to bring traffickers to justice, including eight key criminals behind the 2019 seizure of 11.9 tonnes of pangolin scales and 8.8 tonnes of ivory in Singapore



Case Study 4: Evasion of justice in South Africa

South Africa is home to the largest rhino population in the world and takes a tough approach against poachers. In 2017, it was reported that more than 300 poachers had been shot and others had been sentenced to lengthy terms of imprisonment.

However, there has been recurrent failure to bring middlemen and the leaders of rhino horn trafficking syndicates to justice.²⁷

A number of high-profile suspects arrested in South Africa are out on bail despite being repeat offenders for rhino horn trafficking. Kingpins can remain on bail for years and continue to engage in IWT.

The Groenewald brothers and their associates allegedly profited by \$6.8 million from trafficking rhino horns. The hearings for Dawie Groenewald and seven of his associates have been few and far part, the most recent being during the week of 8 Feb 2021, more than 10 years after their initial arrest.^{28,29}

Cases against leading traffickers have been withdrawn or the files have "gone missing" and investigations often implicate corrupt officials.

The political will to reopen the international trade of rhino horn and other protected species products, such as ivory in South Africa, further damage the deterrent effect of wildlife protection and anti-trafficking laws. The case of a Regional Court President attempting to close the specialised court for rhino-related cases³⁰ sends mixed messages about the Government's stance in combatting wildlife crime.

To stop the poaching and trafficking, South Africa should reinstate its ban on domestic rhino horn trade, tackle corruption and prosecute the kingpins of wildlife crime networks exploiting South Africa as a safe haven.

Above: Leaders of rhino horn trafficking syndicates continue to evade justice in South Africa, exploiting corruption and poor political will

Case Study 5: The Conviction of Wang Minzhong, Beijing, 2020

Wang Minzhong, former head of the Beijing wildlife and nature reserve management office, was sentenced in October 2020 for corruption.

Wang was responsible for registering wildlife products as legal stockpiles and approving trade permits for leopard bone, pangolin scales, musk, saiga horn and other wildlife products.

In April 2019, he was detained on suspicion of crimes committed while on duty and arrested in October of the same year. Wang had accepted bribes in the form of luxury goods and money to allow at least

10 companies to obtain multiple administrative approvals and trade in protected species products.

Financial investigations showed Wang had received RMB8 million (ca \$1.2 million) in monetary bribes and had more than RMB40 million (\$6.1 million) in illegal assets. More than 200 ivory items including carved items and whole tusks, 18 pieces of worked rhino horn, gold and watches were confiscated.

Wang Minzhong was sentenced to 13 years in prison and fined RMB 800,000. RMB 53.7 million was to be recovered through the confiscation of assets.²⁶



5. Lack of international collaboration

IWT is a transnational crime.

International mutual legal assistance between countries is key to the exchange of intelligence and evidence, the application of tactics such as controlled delivery and building analytical capacity, especially where language may be a barrier to investigation.

Investigations in one country may not uncover the higher-level traffickers and those profiting most from IWT in other parts of the world without the co-operation of international law enforcement, particularly between the countries implicated along the wildlife trafficking chain.

Countries need to work together to collect evidence and tackle the operations of transnational networks at all parts of the trade chain. Intelligence analysis can help to identify the links between traders, traffickers, corrupt officials and customers, but international collaboration is required to secure enough evidence for a successful prosecution.

Above: Despite having signed up to international and regional policy frameworks and law enforcement networks for international co-operation, key range, transit and destination countries are failing to co-operate to combat wildlife crime

Case Study 6: The extradition of Mansur Mohamed Surur

On 25 January 2021, Kenyan national Mansur Mohamed Surur was extradited from Kenya to the USA. Surur was involved in the poaching and trafficking of more than 190kg rhino horn and 10 tonnes of ivory, representing at least 35 rhinos and 100 elephants. He was also charged with conspiracy to commit money laundering and conspiracy to distribute over 10 kilograms of heroin.

The investigation, arrest and extradition for the prosecution of Surur was made only possible through the inter-departmental and international collaboration of the US Fish and Wildlife Service, the US Drug Enforcement Administration, law enforcement authorities and conservation partners in Uganda, the Kenyan Directorate of Criminal Investigations and the Kenyan Office of the Director of Public Prosecutions.³²

Right: Ivory trafficking is a serious organised crime decimating African elephant populations



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Case Study 7: Vietnam

Vietnam has made important progress in tackling wildlife crime in terms of improving and implementing national legislation. Vietnam's revised Penal Code, which came into effect on 1 January 2018, significantly increased the penalties for wildlife crime and there has been a rise in the number of convictions resulting in deterrent penalties, as well as better media attention on such cases.

However, a review of 138 major illicit wildlife shipments arriving at airports and seaports in Vietnam since 2010 shows that only 18 (13 per cent) of the cases resulted in arrests and prosecutions.

Since 2018, not a single ivory and pangolin scale seizure at seaports in Vietnam has led to any legal consequences for the criminals involved. The quantity of contraband seized in these incidents amounts to more than 15,000kg of ivory and 34,000kg of pangolin scales, representing at least 2,238 elephants and 34,000 pangolins. This includes

the world's largest ivory seizures, where more than nine tonnes of ivory were seized in Da Nang in 2019, and the world's eighth largest pangolin scales seizure of more than eight tonnes seized in Hai Phong in 2019.

Inadequate investigations further impeded by corruption is the likely cause of the lack of follow-up investigations.³¹

A number of inter-governmental bodies such as INTERPOL, the World Customs Organization (WCO), UNTOC and the UN Convention against Corruption provide frameworks and mechanisms for intelligence sharing and transnational enforcement operations. Countries should more routinely utilise these mechanisms so criminals can be brought to justice, no matter where they hide.

Above: Most large-scale ivory and pangolin seizures in Vietnam have taken place in Hai Phong port. Urgent action must be taken at this port to facilitate follow-up investigations



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