

PUBLIC GOVERNANCE AND TERRITORIAL DEVELOPMENT DIRECTORATE  
PUBLIC GOVERNANCE COMMITTEE**High Level Risk Forum****IFAW Study on E-Commerce and Wildlife Crime: Effective policies and practises to stem the growth of illicit trade****5th OECD Task Force meeting on Countering Illicit Trade****28-29 March 2017**

*This report support discussions in SESSION V on countering illicit trade through e-commerce. The paper focuses on the illegal trade of wildlife products via e-commerce networks. Delegates are invited to take note of the findings in the broader context of current trends and risks for illicit trade via e-commerce and to consider the policy recommendations of this report for discussion.*

*TASK FORCE MEMBERS ARE INVITED to submit written comments to OECD by 30 April 2017.*

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## **E-commerce and Wildlife Cybercrime: Effective policies and practices to stem the growth of illicit trade**

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### **ABSTRACT**

1. This article demonstrates that wildlife cybercrime poses a serious threat to endangered wildlife but can be tackled through enhanced public-private partnerships that bring together online technology companies, enforcers, policy makers and NGOs. In doing so, this leads to increased understanding by consumers of the cost of wildlife trafficking while targeting serious, organised criminals. Section 1 sets out what evidence we have on the scale and nature of online wildlife trade, including which endangered animals are being traded; which regions have a high level of trade; and which online platforms are being utilised to facilitate the trade. Section 2 looks at what approaches have been adopted including policies implemented by online marketplaces and social media platforms; changes to legislation; enforcement efforts; and commitments made at the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Conference of the Parties (CoP). The discussion section explores the effectiveness of these strategies and the conclusion highlights that some positive impacts have been achieved through enforcement operations and the adoption of policies banning illegal wildlife trade by the private sector. However in order to effectively prevent traffickers from using the internet to aid their criminal activities it is necessary to collate and analyse enforcement data at the global level, increase enforcement capacity, roll out private sector policies and strengthen legislation.

### **INTRODUCTION**

2. Historically the sale of illicit wildlife occurred in traditional markets but since the growth of the internet we are seeing compelling evidence that wildlife traffickers are going online to reach a vast virtual marketplace, making wildlife crime a form of cyber-enabled crime.

3. Whilst a legal trade exists in many species of wildlife, online platforms can provide easy opportunities for criminal activities. The available evidence shows that the scale of wildlife cybercrime is significant while enforcement capacity is limited; meaning that online trade poses a serious threat to the survival of some of the world's most iconic species and the welfare of individual animals.

4. Compared to conventional marketplaces, distinguishing legal trade from illegal trade is particularly challenging over the Internet. Items cannot be examined in person and there is usually little, if

any, supporting documentation such as CITES or other national or provincial permits or certificate numbers provided to indicate that the trade is legitimate. Sometimes the item may be disguised by the use of code words, while the traders' identities may not be immediately obvious. Items offered on the internet can be purchased by either local or international traders and therefore it can be challenging to identify whether CITES or other domestic legislation governs the sale.

5. To challenge wildlife cybercrime strategies have focused on engaging the online technology sector in order to force illegal transactions off their sites, stepping up enforcement efforts and strengthening national legislation designed to protect endangered species in order to make enforcement efforts more effective.

## SECTION 1: THE SCALE AND NATURE OF ONLINE WILDLIFE TRADE

6. The available data on wildlife cybercrime highlights the very real risk this trade poses to endangered species. The International Fund for Animal Welfare (IFAW) in its 2014 report *Wanted - Dead or Alive: Exposing Online Wildlife Trade* found 33,006 endangered animals and wildlife products worth at least US\$10.7 million, for sale over a period of six weeks across 16 countries and 280 online marketplaces<sup>1</sup>.

7. Meanwhile TRAFFIC's 2016 *Trading Faces: A Rapid Assessment on the use of Facebook to Trade Wildlife in Peninsular Malaysia* uncovered more than 300 apparently wild, live animals for sale as pets, ranging from sun bears and gibbons to otters and binturongs over a period of five months<sup>2</sup>. In 2008, IFAW's *Killing with Keystrokes* report researchers tracked 7,122 online auctions,

8. advertisements and communiqués offering endangered wildlife for sale across eight countries<sup>3</sup>.

9. These reports highlight the large amount of endangered live animals and their body parts available for sale over a short space of time, yet it is not possible to measure the exact scale of criminality involved in this trade without criminal investigations and prosecutions.

10. IFAW's *Wanted - Dead or Alive* research sought to identify traders worthy of further investigation by enforcement agencies submitting 1,192 intelligence files to law enforcers, which equates to almost 13 per cent of the advertisements found in the course of the research<sup>4</sup>. Importantly multiple enforcement operations and successful prosecutions show that the internet is being used to facilitate wildlife trafficking as outlined in section 2 below.

11. The quantity of online trade is particularly high in Asia, Europe and the US<sup>567</sup>. The global online wildlife market place is extremely diverse. The species offered for sale in each region or country varies greatly depending on the preferences of consumers. Some regions, such as the Middle East, have a demand for live animals as pets or status symbols while others, such as Asia, predominately trade in wildlife products due to the perception that these have medicinal properties, are good financial investments or are regarded highly as decorative items. The most widely traded products and animals are ivory, reptiles and birds<sup>8</sup>.

12. Online marketplaces have been and continue to be the dominant mechanism for trading wildlife and their products; however more recently social media platforms have become an emerging threat<sup>9</sup>. The

Wildlife Justice Commission uncovered a Vietnamese criminal network offering elephant ivory, rhino horn and tiger products available for sale on Facebook and WeChat<sup>10</sup>.

13. Concerns have been expressed that wildlife traffickers may turn to the dark net, which is a network that is hidden from the surface web but can be accessed using specialist software. Research conducted by the University of Kent and published in 2016 could not find any wildlife products available for sale over this network and concluded that this may be because of a lack of enforcement targeting wildlife cybercrime on the surface web.<sup>11</sup> However recent research conducted by INTERPOL's Global Complex for Innovation identifies that this network poses an emerging threat<sup>12</sup>.

## **SECTION 2: STRATEGIES TO TACKLE WILDLIFE CYBERCRIME**

14. Strategies designed to deter and disrupt wildlife cybercrime have focused on strengthening national legislation in order to place the burden of proof on the defendant or provide enforcers with greater powers; ensuring the creation and effective implementation of commercial policies banning illegal wildlife trade over online platforms; and ramping up enforcement efforts.

15. A growing number of online technology companies are banning the trade in endangered species on their sites. As far back as 2008 Chinese online marketplace Taobao banned species included in China's Wildlife Protection Law<sup>13</sup>, while eBay's ban on the sale of ivory across all their platforms came into effect in January 2009<sup>14</sup>.

16. Alibaba, a Chinese business that provides online trade for individual consumers as well as businesses, banned all online postings of elephant ivory, rhino horn, shark fins and the parts and derivatives of sea turtles, tigers, bears and other protected wild animal and plant species in September 2009<sup>15</sup>.

17. More recently Etsy banned the sale of ivory and all other products made from endangered species in July 2013<sup>16</sup> and Chinese giant Tencent, that owns WeChat and the QQ instant messenger launched "Tencent for the Planet. Say No to Illegal Wildlife Trade" in May 2015<sup>17</sup>.

18. TRAFFIC, WWF and IFAW have been working with online companies to develop a united front against online wildlife crime across the sector. This has resulted in seven companies, including eBay, Etsy, Gumtree, Microsoft, Pinterest, Tencent and Yahoo! adopting a new standardised policy framework in August 2016<sup>1819</sup>.

19. Enforcement efforts are more challenging to track as prosecution data is not collated; however there have been a number of international and national operations, cross border investigations and successful prosecutions.

20. In July 2013 the U.S. Fish and Wildlife Service (USFWS) charged 154 perpetrators in Operation Wild Web. Officials seized the pelts of endangered big cats such as Sumatran tigers, leopards and jaguars; live migratory birds and migratory bird mounts; sea turtle shells and sea turtle skin boots; whale teeth; and elephant and walrus ivory<sup>2021</sup>.

21. INTERPOL's Project WEB (2013) was the first international enforcement operation investigating the scale and nature of online ivory trade in Europe. The operation found 660 advertisements of ivory items conservatively valued at approximately EUR 1,450,000 for sale during a two-week period on 61 Internet auction sites in nine European countries<sup>22</sup>.
22. Operation Cobra 3, an international law enforcement operation tackling the illegal trade in endangered species which took place in spring 2015, led to over 300 seizures of animals, plants and derivatives in the UK, the majority of which had been sold online<sup>23</sup>.
23. Following this operation in March 2016 the UK government announced that the environment department, Defra, would provide the National Wildlife Crime Unit with up to £29,000 a year over four years for specific work to challenge wildlife crime conducted online<sup>24</sup>.
24. Most recently Operation Thunderbird, a global wildlife crime operation held over a period of three weeks in January and February 2017, ensured that investigating online marketplaces and social media was an integrated part of the operation<sup>25</sup>. In addition to these operations there have been multiple successful prosecutions<sup>26,27,28,29</sup>.
25. Online wildlife trafficking has been elevated to the largest international conservation forum, CITES, through the adoption of multiple Decisions and the inclusion of specific text on this issue in a Resolution<sup>30</sup>. This was addressed most recently with Decision 17.92 Combatting Wildlife Cybercrime<sup>31</sup> which was adopted at CITES Conference of the Parties (CoP) 17 in 2016. The Decision seeks to capture changes to legislation, establish best practise models, develop enforcement guidelines, and engage with online technology companies. In addition there is an obligation to report back at CITES Standing Committees and create a Resolution on the issue for CoP18.
26. Since 2010 the governments of the Czech Republic<sup>32</sup>, France<sup>33,34</sup> and China<sup>35,36</sup> have added clauses to their wildlife legislation that address the threats posed by illegal online wildlife trade. Many of these have been added over the last 12 months. In the Czech Republic these changes make it a legal obligation for traders to provide reference that they have the necessary legal documentation required to sell certain products and outline the legal requirements for trade. In France, additional powers have been created that enable enforcers to carry out covert operations over digital communication, and in China there is a ban on the publication of advertisements offering illegal wildlife for sale. The government of the United Kingdom has made a commitment to alter their wildlife legislation which will place an additional burden on the seller to provide evidence of the legality of trade<sup>37</sup>.

## Discussion

27. Research and enforcement actions show that endangered wildlife is being traded over the internet in significant quantities. Reports on these cases show that live animals are being taken from the wild and sold over the World Wide Web with recent examples including wildlife traffickers selling baby chimpanzees online out of the Ivory Coast<sup>38</sup>, while at the start of this year 27 live slow lorises, due to be posted for sale online, were seized by authorities in Indonesia<sup>39</sup>.
28. The quantity of animals being traded can be extremely high as demonstrated when the UK's Border Force seized 600,000 live endangered eels destined for Hong Kong<sup>40</sup>. The illegal trade in parts and products from these animals is also dangerously high given the current poaching crisis. The Wildlife Justice Commission alone exposed one Vietnamese network trading in items representing up to 907 elephants, 579 rhinos, and 225 tigers<sup>41</sup>.
29. However measuring the true scale and impact of wildlife cybercrime remains challenging as global data is not collated and analysed by IGOs. Online trade is likely to be significantly higher than the

current evidence suggests as the research has been restricted to brief snap shots of time while enforcement interventions are limited.

30. The enforcement examples cited here highlight that organised criminal syndicates will be involved in the trafficking of wildlife to feed this online demand; capturing and/or killing wildlife and then trafficking it from its source location to the consumer, who is based thousands of miles away, is a complex operation.

31. Yet it is important to note that the scale at which these traders operate varies significantly and it is recognised that enforcers will and should prioritise targets for investigations based on the impact that the trade will have on the endangered species.

32. Out of the strategies listed here perhaps the easiest to monitor is the implementation of the online technology companies policies aimed at forcing wildlife traffickers off their sites. Data tracking wildlife advertisements on online marketplaces has been obtained and some successes in their implementation are being documented

33. This includes the significant decrease in trade in wildlife products over Chinese online marketplaces such as Tabao (down to only 1.99 per cent of the trade in IFAW's *Wanted - Dead or Alive* report) and the decrease in ivory sales over of eBay's sites in Canada, Germany, France, Belgium and the Netherlands.

34. However some traders have sought to avoid detection by using code words or moving to social media sites. Social media platforms are focused on communication and, unlike online marketplaces, are not specifically designed to facilitate online trade. Therefore measuring the scale and nature of wildlife trade across these diverse platforms is much more challenging. Communication over these platforms takes many forms with a variety of different privacy settings making a standardised search method much harder to apply in practise.

35. Published baseline data on the number of seizures, arrests, and prosecutions as they relate to wildlife cybercrime is lacking. Information on enforcement operations and investigations on this issue are not collated and analysed at an international or possibly even a national level. It is therefore very difficult to objectively assess the long-term substantive impacts of the enforcement interventions, though in the short-term they disrupt the trade of the offenders who are caught.

36. Enforcement capacity remains a serious challenge to policing this form of criminality and it would be premature to judge the impact of current enforcement actions while so little resources and prioritisation have been allocated to this issue.

37. Similarly, changes to legislation have occurred in very few countries and the majority have either only recently taken effect or are yet to be transposed into legislation, making it too early to pass judgement on this strategy.

38. Attempts to obtain support for tackling wildlife cybercrime have been successful at the CITES CoPs with the adoption of multiple Decisions; however the implementation of these commitments is incomplete. Parties to CITES had agreed to publish research, identify trends and track trade routes and methods of shipment as they relate to trade over the internet but this has not been gathered or disseminated.

## **Conclusion and Policy Recommendation**

39. The internet provides wildlife traffickers with access to a much larger market, one that is global, open 24 hours a day, 365 days a year and provides a high degree of anonymity. Chances of detection are low while profits from selling endangered wildlife can be extremely high.

40. The available research, operations and prosecutions would indicate that the scale of wildlife cybercrime is significant, in fact it is likely to be larger than the current research and enforcement actions would suggest, while the negative impact of the trade could be very high as some of these species are highly endangered.

41. In order to crack down on the growing threat of wildlife cybercrime it is important to obtain more data profiling the traffickers, their networks and their modus operandi, therefore it is important to ensure that data on enforcement actions, trafficking trends and intelligence on traders is collected and analysed at both global and national levels.

42. Enforcement operations and prosecutions show that there has been some success in bringing wildlife cybercriminals to justice and this should be expanded in order to serve as an effective deterrent. Enforcement capacity must be increased with the support of collaborative enforcement networks that bring together wildlife and cybercrime expertise, leading to more prosecutions across a larger geographic scope as well as establishing best practise guidelines.

43. Online marketplaces that have adopted strong policies against wildlife traffickers have demonstrated that this can and often does lead to a decrease in illegal trade on their platforms. However there are still large numbers of online platforms that have no policies prohibiting illegal wildlife trade and there are examples where the implementation of existing policies are not robust enough to completely close down online markets to wildlife traffickers. Therefore it is important that online technology companies without policies banning illegal wildlife trade introduce such policies as a matter of urgency, adopting a standardised wildlife policy framework, while those companies that have these policies need to ensure these are affectively implemented.

44. Governments should continue to review their laws and strengthen them where necessary, placing the legal burden of proof on the seller and ensuring enforcers have sufficient powers to carry out investigations.

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