



Wildlife Justice
Commission

Rapid assessment of the impact of COVID-19 on wildlife trafficking

*"Business is really tight, and
the bosses are worried.
Can't do any business."*

April 2020

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In the first three months of 2020, the Wildlife Justice Commission was offered more than 22 tonnes of pangolin scales for sale in Vietnam. While the availability continues at an alarming rate, border restrictions have impacted upon traffickers' ability to deliver.

"I have a lot right now. How many kg do you want?"

QUOTES FROM PANGOLIN SCALES BROKER TO WILDLIFE JUSTICE COMMISSION OPERATIVE IN FEBRUARY 2020.

"When the border situation clears I will contact you. This situation makes it hard to do business."

Executive Summary

In the four months since the novel coronavirus (COVID-19) outbreak was first reported by China on 31 December 2019, it has spread to almost every country and caused unprecedented shutdowns across the world. In this short time, border closures, travel restrictions and stay at home orders have had an immediate effect on people's lives and businesses, and organised crime networks have not been immune.

This report presents the Wildlife Justice Commission's findings and observations from January to April 2020 on how measures taken globally in response to COVID-19 are impacting wildlife trafficking networks. While the dynamics of this illicit trade are constantly changing even in so-called "normal times", intelligence collected by the Wildlife Justice Commission shows that traffickers are currently experiencing a range of challenges in transporting products and accessing markets and customers.

VIETNAM, 5 MARCH 2020



Person of interest 2

"Security is too heavy at the border. Products can't go out now."

Difficulty transporting products into China is resulting in the stockpiling of large quantities of raw ivory in Vietnam, Lao PDR and Cambodia. While ivory stockpiling was already starting to occur during 2019 due to increased law enforcement efforts in China, it has been exacerbated by recent border closures and subsequent increased border security. As a direct effect of transportation difficulties, the Wildlife Justice Commission also believes that stockpiling of large quantities of pangolin scales is now occurring in Vietnam.

Sudden and unpredictable aviation security measures such as last-minute flight diversions are also having an unforeseen impact on criminal dynamics. In March, Customs officers at Can Tho airport in the south of Vietnam made a rhino horn seizure from a diverted flight from South Korea¹. It is known that corrupt officers at airports facilitate the clearance of smuggled products, but new COVID-19 measures mean traffickers are not guaranteed that the shipment will arrive at their (air)port of choice.

Effects are also seen in Southeast Asian ivory retail markets serving mainly Chinese clientele. While

ivory markets have been on the rise in Cambodia and conversely declining in Lao PDR, sellers in both countries are experiencing a dramatic downfall in the number of Chinese customers due to travel restrictions.

A major concern is that poaching incidents may increase during the lockdown period, as criminal networks exploit perceived opportunities of park closures, reduced patrols in protected areas, or the diversion of law enforcement resources to deal with COVID-19 issues. The Wildlife Justice Commission understands that several prolific poaching bosses in Africa are actively organising poaching teams to enter parks and protected areas during this time.

Measures imposed to curb the widespread transmission of COVID-19 may have temporarily restricted illicit trade by default as economies grind to a halt, but this is unlikely to last long. All indications presently show that the high-level trafficking networks will resume operations as soon as they are able, or will adapt and find alternative workarounds for the current blockages.

¹ <https://vietnamnews.vn/society/653074/nearly-30kg-of-rhino-horn-seized-at-can-tho-airport.htm>

Introduction

The Wildlife Justice Commission has observed underlying changes occurring in the criminal dynamics of wildlife trafficking even before the COVID-19 pandemic, and several of these appear to have intensified during the current crisis. This includes a somewhat waning interest in ivory among brokers, which may be partly due to the ivory trade ban in China² and a declining trend in wholesale prices of raw ivory since 2015³. Ivory smuggling into Asia has continued even though traders have struggled to sell the stock and is resulting in owners stockpiling large quantities of product that they are cautious to move across Asian borders.

On the other hand, pangolin scales are holding their value and retail prices in Asia appear to have risen since 2017⁴. The Wildlife Justice Commission's analysis of seizures from 2015-2019 shows an in-

creasing prevalence of mixed shipments of ivory and pangolin scales moving from Africa to Asia⁵, and together with the growing difficulties in ivory trade, it is possible that pangolin scales could be substituting ivory in the illegal market in China.

The Wildlife Justice Commission has seen an increasing number of wildlife brokers offering large quantities of pangolin scales for sale since 2019. Even in the first few months of 2020 as COVID-19 was spreading, at least four Vietnamese persons of interest offered Wildlife Justice Commission operatives 22,600 kg of pangolin scales. However, during this period, several Vietnamese traders also expressed difficulties with smuggling wildlife into China due to extended border checks and travel restrictions and spoke of their desperation to offload large quantities of stock, often at discounted prices.

² China's domestic ivory trade ban was brought into force on 1 January 2018.

³ WJC 2019, Snapshot Analysis: Ivory Smuggling 2015-2019, Concealment, Routes and Transportation Methods, p.5

⁴ WJC 2020, Scaling Up: The Rapid Growth in the Industrial Scale Trafficking of Pangolin Scales 2016-2019, p.

⁵ WJC 2019, Snapshot Analysis: Ivory Smuggling 2015-2019, Concealment, Routes and Transportation Methods, p.4

Current Status of Trafficking Transportation Methods in Play During the COVID-19 Emergency

Air • CONTRIBUTING FACTORS

- In mid-March broker informs Wildlife Justice Commission operative that "all airlines have stopped carrying live animals".
- The fear of quarantine was also a considered risk from a trafficker who reported to a Wildlife Justice Commission operative "when you fly to another country, they will quarantine you".
- Clearance at airports facilitated by corrupt / complicit customs officers is not as secure as it has been in the past.
- Delay in products being received, meaning suppliers cannot service their business.

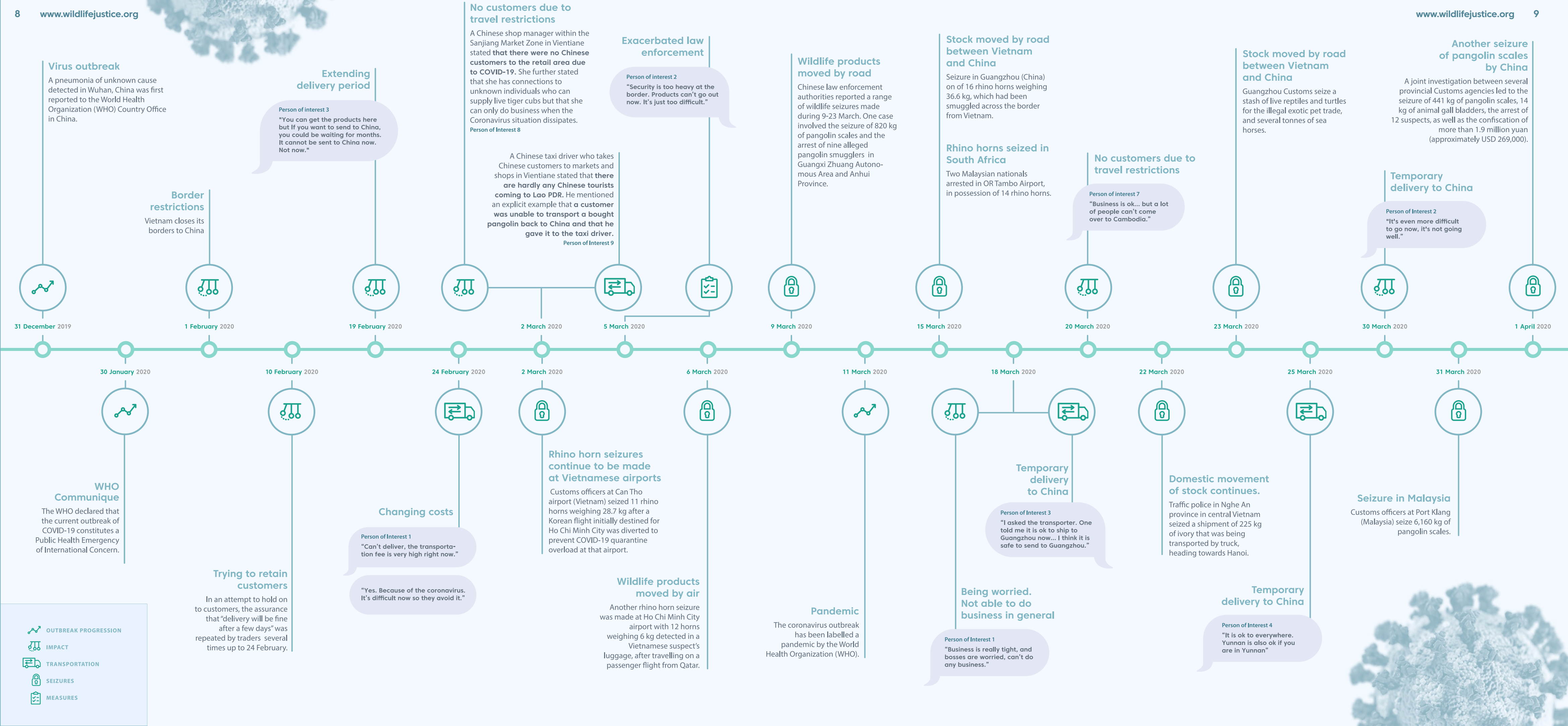


Ship • CONTRIBUTING FACTORS

- Transportation via sea is likely to be an alternative option as transportation by air becomes impossible.
- Products are still arriving / or due to arrive via sea as they were sent pre-lockdown.
- Example: Malaysian authorities seize record 6 tonnes of African pangolin scales on 31 March.
- Intelligence reported that ivory was smuggled into Ho Chi Minh City by sea, in late March.

Road • CONTRIBUTING FACTORS

- Many roadblocks and increased security at check points on land borders (such as between Malaysia and Thailand).
- Some brokers and couriers are continuing to offer delivery 'by road', albeit at a reduced rate.
- Products can still successfully make it over the borders (recent pangolin scale seizures in China were smuggled by land from Vietnam).
- From mid-April traffickers begin to state: "the road will be opening up soon".



Timeline of observations and key events

31 December 2019: The virus outbreak is first reported to the World Health Organisation (WHO) Country Office in China, with some early cases initially associated with exposure to a seafood wet market in Wuhan. The new coronavirus is believed to have emerged as a result of animal to human transmission.

30 January 2020: The WHO declares that the virus outbreak constitutes a Public Health Emergency of International Concern.

1 February 2020: Vietnam closes its border with China and introduces an indefinite suspension on all flights to and from mainland China.

10 February 2020: Traffickers assure that delivery to China is still possible.

A Vietnamese person of interest said delivery is not a problem as long as the quantity ordered is large enough, and any difficulties delivering to China will cease soon. In an attempt to hold on to customers, the assurance that “delivery will be fine after a few days” was repeated several times up to 24 February.

19 February 2020: Traffickers in Vietnam report a longer than expected delivery period.

Person of interest 3, Vietnam

“You can get the products here, but if you want to send them to China, you could be waiting for months. It cannot be sent to China now. Not now.”

24 February 2020: Traffickers report changing costs due to transportation difficulties.



Person of interest 1, Vietnam

“Can’t deliver, the transportation fee is very high right now.”

“Yes. Because of the coronavirus. It’s difficult now so they avoid it.”

2 March 2020: Ivory retailers and associates report a lack of customers due to travel restrictions.

A Chinese shop manager within the Sanjiang Market Zone in Vientiane stated that there were no Chinese customers to the retail area due to COVID-19. She further stated that she has connections to unknown individuals who can supply live tiger cubs, but that she can only do business when the Coronavirus situation dissipates. – Person of Interest 8, Lao PDR.

A Chinese taxi driver who takes Chinese customers to markets and shops in Vientiane stated that there are hardly any Chinese tourists coming to Lao PDR. He mentioned an explicit example where he was given a pangolin purchased by a customer who was unable to transport it back to China. – Person of Interest 9, Lao PDR.

2-6 March 2020: Rhino horn seizures continue to be made in Vietnam.

Last-minute airport security measures may have inadvertently resulted in a rhino horn seizure at Can Tho airport in the Mekong region of southern Vietnam. Customs officers at the airport seized 11 rhino horns weighing 28.7 kg after a Korean flight initially destined for Ho Chi Minh City was diverted to prevent COVID-19 quarantine overload at that airport.⁶ Four days later, another rhino horn seizure was made at Ho Chi Minh City airport with 12 horns weighing 6 kg detected in a Vietnamese suspect’s luggage, after travelling on a passenger flight from Qatar⁷. These seizures show that traffickers are continuing to transport wildlife products by air, despite increased airport security measures and fewer passenger flights operating.

5 March 2020: Increased border security and “road closures” prevent transportation of wildlife products.



Person of interest 2, Vietnam

“Security is too heavy at the border. Products can’t go out now. It’s just too difficult.”

A Vietnamese person of interest told a Wildlife Justice Commission operative they had large quantities of pangolin scales in a warehouse, which cannot be moved due to border checks. This suspect also forwarded images of military posts on the border with China (Images 1 and 2), showing that traffickers

were closely following developments at the border, and even physically travelling there to check the situation.



Image 1: Military post on the Vietnam-China border.



Image 2: Military officers maintaining a presence along the border.

⁶ <https://e.vnexpress.net/news/news/29-kg-of-rhino-horns-seized-from-man-arriving-from-south-korea-4063687.html>

⁷ <https://e.vnexpress.net/news/news/man-held-at-saigon-airport-with-six-kg-of-rhino-horns-4065654.html>

9-23 March 2020: A range of wildlife seizures in China show some traffickers are still attempting to move products over land.

Chinese law enforcement authorities reported a range of wildlife seizures made during this period. One case involved the seizure of 820 kg of pangolin scales and the arrest of nine alleged pangolin smugglers on 9 March 2020 in Guangxi Zhuang Autonomous Area and Anhui Province. According to Chinese Customs, the main suspect had ordered the shipment of scales from a supplier in Vietnam in response to local customer demand and organised a smuggling group to move them over the border into China through an unofficial border crossing⁸.

Also occurring during this period was a seizure in Guangzhou on 15 March 2020 of 16 rhino horns weighing 36.6 kg which had been smuggled across the border from Vietnam. Other seizures included live reptiles and turtles for the illegal exotic pet trade, and several tonnes of sea horses⁹.

10 March 2020: Brokers know when border checks are relaxed or tightened.

A Vietnamese broker stated that their contact at the Chinese border has informed that it will slowly open up soon. This will enable delivery to Dongxing and Pingxiang, but they haven't run anything yet. The broker further indicated that another batch of pangolin scales had just successfully arrived in Vietnam.

11 March 2020: The WHO formally declares COVID-19 a pandemic.

15 March 2020: Rhino horn seizure in South Africa shows that some trafficking out of Africa also continues. The Wildlife Justice Commission received information that two Malaysian nationals of Chinese origin were arrested at O.R. Tambo International Airport in South Africa in possession of 14 rhino horns. This seizure was made just one week before the South African President announced that the country would enter a period of full lockdown.

18 March 2020: Traders report concern due to impacts on business operations.



Person of interest 1, Vietnam

"Business is really tight, and the bosses are worried. Can't do any business."

18 March 2020: Trader reports temporary changes in delivery to China.



Person of interest 3, Vietnam

"I asked the transporter. One told me it is ok to ship to Guangzhou now... I think it is safe to send to Guangzhou."

20 March 2020: Wildlife traders continue to report a lack of customers.



Person of interest 7, Vietnam

"Business is ok... but a lot of people can't come over to Cambodia."

22 March 2020: Ivory seized while being moved internally within Vietnam. Traffic police in Nghe An province in central Vietnam seized a shipment of 225 kg of ivory that was being transported by truck, heading towards Hanoi¹⁰. This seizure shows that domestic movement of wildlife products also continues, although whether it was for stockpiling or sale is not clear in this case.

30 March 2020: Trader reports changes again in delivery to China.



Person of interest 2, Vietnam

"It's even more difficult to go now, it's not going well."

31 March 2020: Possible delayed impact on shipments via sea cargo.

While tightened law enforcement checks and restrictions on trade and travel immediately prevented traffickers from smuggling large quantities of wildlife products across borders by land and passenger

air travel, it is possible that there was a delayed impact on smuggling via sea cargo due to the far longer transit times involved. A large seizure of 6,160 kg of pangolin scales made by Customs officers at Port Klang, Malaysia on 31 March 2020 may substantiate this¹¹, as the shipment could have been at sea for one to two months prior to arriving in Malaysia, before COVID-19 restrictions were implemented more seriously across Africa. It is also possible that maritime smuggling routes may become more important as the global shutdown continues, due to limited alternative options.

1 April 2020: Despite the lockdown, Chinese Customs authorities make another pangolin scale seizure. A joint investigation between several provincial Customs agencies led to the seizure of 441 kg of pangolin scales, 14 kg of animal gall bladders, the arrest of 12 suspects, as well as the confiscation of more than 1.9 million yuan (approximately USD 269,000)¹². As with a previous pangolin scale seizure on 9 March 2020, it is believed the suspects bought the pangolin scales from a broker in Vietnam and smuggled them into China using unofficial border crossings.

⁸ https://k.sina.cn/article_6539404397_m185c7646d02000n01w.html

⁹ https://www.jqknews.com/news/420829-Customs_broke_the_smuggling_of_rhinoceros_horn_sea_horse_stem_green_iguana_and_other_wild_animals_and_their_products.html

¹⁰ <http://cand.com.vn/Thi-truong/Thu-giu-hon-200kg-nga-voi-duoc-van-chuyen-tren-Quoc-lo-1A-587516/>

¹¹ <https://www.thestar.com.my/news/nation/2020/04/02/rm78mil-of-pangolin-scales-seized>

¹² http://cq.cqnews.net/html/2020-04/10/content_50888385.html

Specific impact on wildlife trafficking in Asia

Vietnam

The Wildlife Justice Commission is in receipt of intelligence that at least 10 tonnes of ivory were being stored in Hanoi as far back as June 2019 (see Image 3) and scattered in batches between Vietnam and Cambodia. The broker was struggling to sell the ivory and was reluctant to move it due to increased law enforcement efforts in China.

Vietnam's COVID-19 response has further compounded this situation. The government has introduced a range of border security measures such as barring the entry of foreign nationals, not issuing visas until further notice, and suspending passenger flights to and from mainland China¹³. Several Vietnamese persons of interest have stated that they cannot transport wildlife into China due to 'closed roads' and the suspension of bilateral trade between Vietnam and China. This is affecting traffickers' business operations as legitimate products that are often used to conceal illicit wildlife products are also blocked from crossing the border. In their desperation to offload stock, some traffickers have been willing to offer discounts.



Image 3: Photo of a large stockpile of ivory in Vietnam sent by traders to WJC investigators in June 2019.

Cambodia

Intelligence indicates that batches of raw ivory are also stashed in Cambodia. The apparent spread of ivory between Vietnam and Cambodia could mean that it is being transported to Cambodia for carving and processing, which is plausible considering the recent rise in the number of ivory retail markets in Cambodia.

The Wildlife Justice Commission's recent missions to Phnom Penh established that COVID-19 is affecting the city's ivory retail markets. Tour guides and shop owners mentioned to WJC operatives that there are very few Chinese tourists and customers in Phnom Penh. Many Chinese nationals returned to China in late January 2020 for the lunar new year and have been unable to return due to travel restrictions and quarantine measures.

If a lack of customers and market closures continue for a prolonged period of time, it is possible that retailers may increase the online sale of wildlife products in order to continue doing business.

Lao PDR

The Wildlife Justice Commission's undercover missions to Lao PDR in 2019 and 2020 identified that the previously open ivory trade in Vientiane has become more clandestine and parts have shifted to areas outside the capital. As with markets in Cambodia, Wildlife Justice Commission operatives observed a noticeable downturn in business and many shops were closed. There was a low number of wildlife products on offer and shop owners mentioned the absence of (Chinese) clientele.

Due to COVID-19 measures, movement in Lao PDR is currently limited. Traders shared notices on the suspension of trade between Lao PDR and China, and permits are now required to enter and leave the Sanjiang Market Zone in Vientiane.

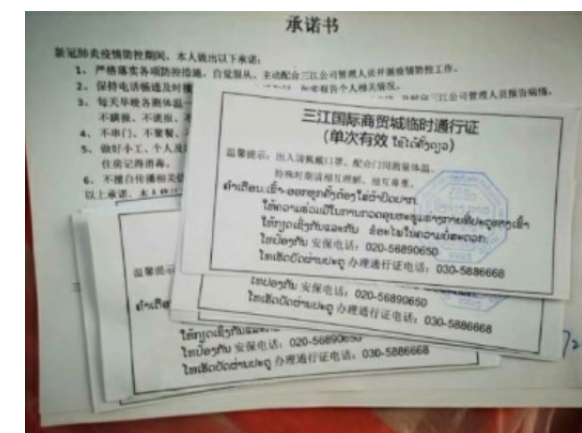


Image 4: Sanjiang market zone permits.

¹³ Vietnam Tourism Advisory Board information, accessed via <https://vietnam.travel/things-to-do/information-travellers-novel-coronavirus-vietnam>

Thailand & Malaysia

Since August 2017, the Wildlife Justice Commission has been gathering evidence of the workings of a Malaysia-based criminal network operating in live animals for the illegal exotic pet trade. Trade routes have been found to span at least 12 countries including Indonesia, Malaysia, Thailand, Bangladesh, India, Sri Lanka, Pakistan, Saudi Arabia, Jordan, Oman, United Arab Emirates, and Qatar; and possibly also Russia and Ukraine.

In February 2020, one of the brokers indicated the only transportation difficulties were in the section from Kuala Lumpur to Bangkok, due to heightened security at Suvarnabhumi Airport in Bangkok and roadblocks where transport is checked. However, by March 2020 the broker indicated that trade across the entire region was unable to move.

China

In response to the transmission of the COVID-19 pathogen from animals to humans as reported at the Wuhan market, on 24 February 2020 China announced a ban on some wildlife trade and the consumption of wildlife meat, effective immediately¹⁴.

It has been widely pointed out that China's ban only targets food-related wildlife consumption and does not apply to other types of wildlife use such as traditional medicine or pets. Since then, other countries have also announced plans for similar bans, including Vietnam¹⁵ and Gabon¹⁶. While it remains to be seen what impact (if any) this type of policy approach may have on wildlife consumption, it is unlikely to address the high-level wildlife traffickers operating on an industrial scale.

Wildlife poaching

There are some fears that wildlife poaching could actually increase during this period, as many countries have closed their national parks as part of social distancing measures to limit the spread of COVID-19¹⁷. This will undoubtedly result in significant financial losses associated with the lack of wildlife tourism revenue, which is a major industry in some countries such as Kenya. Closures could also result in job losses for local people who work in parks as trackers, eco-guards, and other roles supporting the travel and tourism industry, and there are some concerns they may be susceptible to turn to poaching for a source of income if their jobs are threatened¹⁸.

Organised crime groups may also perceive park closures or the reduced presence of rangers conducting patrols as ideal opportunities for exploitation. Similarly, the absence of tourists who may unwittingly act as "capable guardians"¹⁹ from within the parks further increases this risk.

The Wildlife Justice Commission is in receipt of intelligence that known poaching organisers operating across Southern Africa are intending to take advantage of the current situation. This was highlighted during the recent 8 April 2020 full moon period in the Kruger National Park, South Africa, where the Wildlife Justice Commission received intelligence that six different poaching crews would attempt to enter the park from Mozambique to take advantage of the full moon conditions. Although South Africa's Department of Environmental Affairs has reported there has been no increase in poaching since the lockdown began²⁰, it will be crucial to monitor this situation closely across wildlife poaching hotspots.

¹⁴ <https://www.scmp.com/news/china/article/3052151/china-bans-trade-eating-wild-animals-battle-against-coronavirus>

¹⁵ <https://e.vnexpress.net/news/news/vietnam-to-ban-wildlife-trade-following-conservationists-demand-4066078.html>

¹⁶ <https://www.newsweek.com/eating-bats-pangolins-gabon-coronavirus-pandemic-1496329>

¹⁷ <https://www.nationalgeographic.com/animals/2020/04/wildlife-safaris-halted-for-covid-boost-poaching-threat/>

¹⁸ <https://www.afrik21.africa/en/kenya-park-shutdown-due-to-covid-19-puts-wildlife-at-risk/>

¹⁹ Tourists can provide protection through interaction and their presence. Source: Tactical Crime Analysis, Paulsen et al. (2009)

²⁰ <https://www.dispatchlive.co.za/news/2020-04-07-peace-for-rhinos-as-lockdown-keeps-poachers-away-for-now/>

From the Wildlife Justice Commission's observations, it is evident that COVID-19 prevention measures across the world are having a significant impact on wildlife trafficking operations, particularly in Asia where border closures and restrictions are currently preventing the "safe" movement of products into China. However, high-level organised crime does not stop, and it is likely that the current lull will only be temporary. Despite the constraints and based upon undercover investigations, wildlife seizures made during this period show that trafficking continues – albeit at a somewhat reduced level.

Traffickers have been found to be closely watching border security developments and keeping abreast of travel restrictions and trade suspensions. Many traffickers expressed frustration and concern, and are clearly focused on returning their operations to previous levels as soon as they can.

As criminal networks are agile and have the resources to quickly adapt to new environments, it is vital that the situation is monitored regularly to detect any changes in crime dynamics. The Wildlife Justice Commission will continue to gather intelligence and conduct analysis to assess the impact of the COVID-19 pandemic on wildlife trafficking.

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