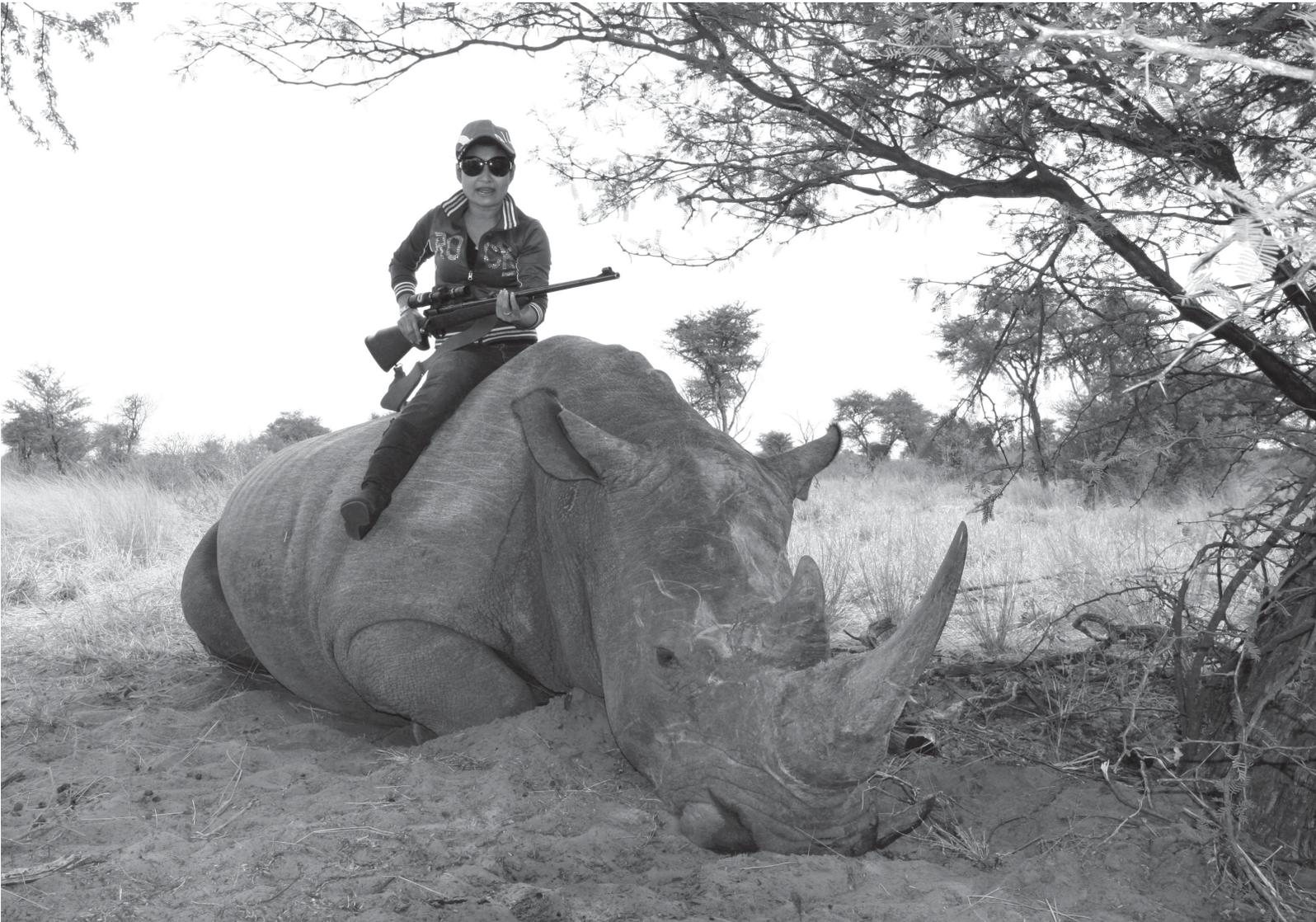


ACET

ANALYTICAL CENTER
OF EXCELLENCE
ON TRAFFICKING



Illicit Wildlife Trade in Southeast Asia | Evolution, Trajectory and How to Stop It

This material is offered free of charge for personal, official, educational and non-commercial use, provided the source is acknowledged. The material may not be altered prior to dissemination in any way.

For further information please contact steve@acet-recovery.com

Copyright: Analytical Centre of Excellence on Trafficking (ACET), 2019

TABLE OF CONTENTS

Executive Summary	3
Challenges	3
Opportunities	4
Evolution of Wildlife Trafficking in Southeast Asia and China	5
Wildlife Business Trends in Southeast Asia and China: Past, Present, and Future	5
Signs Of Poaching Spikes On Horizon: China In 1980's	5
Sourcing Evolution	6
North Korean Connection	6
China Expands Direct Sourcing	7
Enforcement Affects Supply Chains	7
Vietnam: Sub-Contract Role for Chinese Companies	8
Thailand as an International Hub	8
Laos: Trafficker Haven and Entrepôt	10
Traffickers Adapt to Increased Thai Enforcement	10
Enforcement Up, Supplies Down: Asian Traffickers Look to Africa	11
African and Asian Dealers Connect	13
2010-Present: Disruption and Displacement	13
Evolution of the Counter-Wildlife Trafficking Response	15
Networks to Counter Trafficking Networks	15
ASEAN-WEN and Its Working Groups	16
Capacity Building with ASEAN-WEN	17
Phase II of ASEAN-WEN Support – the ARREST Program	17
Operation Cobra I	19
Operation Cobra II	19
Operation Cobra III	19
Overall CWT Results (2006-2016)	19
ASEAN Beyond 2020 – Which Direction Can CWT Efforts Go?	21
Current Status of Illicit Trafficking	21
Why Illicit Trafficking Chains Continue	21
Main Countries in the Africa-ASEAN Supply Chain	21
Priority Agencies in Key Countries	22
Networking is Key	22
Best Platforms and Mechanisms to Sustain and Improve CWT Networking	22
Strategic Recommendations	25
Strategic Approach	25
Conclusion	31

LIST OF ABBREVIATIONS USED IN THIS REPORT

ACB	ASEAN Centre for Biodiversity	OSINT	Open-Source Intelligence
ACET	Analytical Center of Excellence on Trafficking	PCU	Program Coordination Unit
AEG	ASEAN Expert Group on CITES	PR	Public Relations
AML	Anti-Money Laundering	PROTECT	Protected-area Operational & Tactical Enforcement Conservation Training
AMLO	Thailand Anti-Money Laundering Office	R&D	Research and Development
ASEAN	Association of Southeast Asian Nations	RIACM	Regional Investigative and Analytical Case Meeting
CCTV	Closed-Circuit Television	SAP	Strategic Action Plan
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	SE	South East
CTOC	Counter Transnational Organized Crime	SFA	China's State Forestry Administration
CWT	Counter Wildlife Trafficking	SIG	Special Investigation Group
DEA	US Drug Enforcement Administration	UNODC	United National Office on Drugs and Crime
DETECT	Detection of Environmental Crime Training	USAID	US Agency for International Development
DNP	Thailand Department of National Parks	USFWS	United States Fish and Wildlife Service
ENV	Education for Nature - Vietnam	WCO	World Customs Organization
FIU	Financial Intelligence Unit	WCS	Wildlife Conservation Society
ID	Identification	WEN	Wildlife Enforcement Network
IDEC	International Drug Enforcement Conference	WIRE	Wildlife Inter-Regional Enforcement Meeting
JJ	Jatujak (Chatuchak) Weekend Market	XTC	Xaysavang Trading Company
LATF	Lusaka Agreement Task Force		
ML	Machine Learning		
MPS	Ministry of Public Security		
NGO	Non-Governmental Organization		

Executive Summary

ASEAN is being confronted with a serious threat to its people and environment.

Wildlife trafficking, worth billions of dollars annually, is destroying nature and harming society. It is strengthening corruption, undermining governance along the supply chain, and weakening security for affected communities. The strong demand for wildlife products from within the region, and neighboring China, is inadequately addressed by a developing criminal justice sector. Determined, innovative and holistic counter measures are needed across the region.

Currently, enforcement against wildlife criminals in Southeast Asia all too often results in seizures without arrests, very few convictions, low penalties, or no penalties at all. In a nutshell: trafficking in ASEAN remains more rewarding than counter trafficking.

ASEAN countries can reverse the status quo by setting key goals: to create a more robust counter wildlife trafficking (CWT) enforcement chain, and to introduce incentives to counter wildlife trafficking agencies.

These goals are achievable if promising new opportunities are capitalized upon. A key step is to tap graft, tax and anti-money laundering inspection agencies to help police, Customs, CITES and prosecutors in countering wildlife trafficking. These new stakeholders are critical to success – traffickers are routinely violating money laundering, corruption, and tax laws. Such non-traditional stakeholders have the authority to seize their assets, close their businesses, convert fines to rewards, and share rewards with partner agencies and civil society on a much greater scale than traditional wildlife enforcement authorities.

To understand why we recommend the participation of non-traditional actors, we must trace the story of wildlife trafficking and countermeasures from origin, attempting to answer two questions: a) How did the wildlife trafficking crisis evolve; and b) What has already been tried to solve it?



CTOC Lusaka, Zambia (February 2018) “Converging international law enforcement covering the supply chains of the trade routes used for endangered species trafficking continues to be a top priority” (Photo by Freeland)

This report maps the evolution and trajectory of wildlife and counter-wildlife trafficking in Southeast Asia, while analyzing what has worked – or not – and where the region can go next. The research points to clear challenges, opportunities and pathways forward.

Challenges

- Systemic Corruption: complicit government and corporate officers facilitate the trade.
- Lack of incentives to CWT: wildlife crime pays; wildlife enforcement offers few rewards.
- Daunting law books: Officers lack easy access to all laws that can help in CWT.
- Limited skills and technology: Many wildlife crimes are committed online or on the phone, but only a small percentage of law enforcers are proficient and tooled up in digital intelligence, and the few that are may not possess investigation skills.
- Lack of sharing: data holders don't share insights for fear of leaks or losing credit.
- Police still on the sidelines: CWT cooperation

is still led by CITES authorities who are typically not fully capacitated in law enforcement.

Opportunities

- A major driver of trafficking through Southeast Asia is China. Chinese Customs is currently engaging foreign agencies and civil society organizations to collaborate on CWT.
- Trafficking is facilitated by financial flows and corruption. Asian banks have shown interest in disrupting these flows by fast tracking compliance, capacity building, and proactive support for CWT investigations.
- Linking existing counter-organized crime and counter-trafficking networks, instead of creating and funding new ones, will reduce expensive, low-yield meetings and increase action and impact.

Evolution of Wildlife Trafficking in Southeast Asia and China

In this section we explore factors leading to wildlife trafficking in Southeast Asia and the trajectories of key countries.

Wildlife Business Trends in Southeast Asia and China: Past, Present, and Future

Wildlife trafficking businesses that have exploited Southeast Asia as a source and transit for wildlife trafficking have deep roots in the region. Since the 1980s (and in some cases, much earlier), these businesses have formed well-established supply chains made up of wild animal and plant specialists, smuggling specialists, financiers, and corrupt officials. Today's poaching epidemic in Asia and Africa can often be traced to some of the same companies, individuals, and families that have been active for decades.

Therefore, it is useful to understand how today's traffickers evolved; how they used to operate; and how they have adapted to increased enforcement over the years to maintain highly profitable and destructive businesses.

Several themes emerge when reviewing this history:

- China-based buyers dominating the market
- Presence of NGOs leads to increased enforcement actions
- Increased enforcement makes traffickers more reliant on organized crime
- Organized crime smuggling services make supply chain operations more expensive, the price of which is passed onto buyers. (Note: while this trend contributes to the increased prices of the targeted species, so does their depletion and perceived value as stocks decrease)
- Despite multiple laws being violated (including transnational organized crime, money laundering, tax evasion, corruption and more), law enforcers usually revert to applying wildlife laws only, and are usually satisfied with taking the case no further than the initial seizure.

There is greater acceptance today that wildlife trafficking is linked to other forms of transnational organized crime. The link can be summarized as follows:

- Some smuggling specialists and corrupt government officials involved in facilitating wildlife trafficking are often involved in facilitating trafficking in other contraband
- Some financiers often have a diversified portfolio of black market investments
- Some smuggling specialists see the high profits and low risk associated with trafficking wildlife, and choose to get more involved in sourcing and selling it to get a larger cut. Hence, for example, we see organizations that facilitate cross border drug trafficking becoming more directly involved in dealing rhino horn.¹

Information on today's major trafficking businesses operating throughout Southeast Asia and China is dated from the 1980s to the present.² Company names have changed over time, but many family names and connections remain similar.

Signs Of Poaching Spikes On Horizon: China In 1980's

Across Southeast Asia, family run businesses with ties to China have, since the 1980s, been sourcing wild animals and plants to feed the commercial demand in the growing economy of China. Chinese wildlife consumer power was rising in the mid '80s. Species that were fetching the most money then included snakes, turtles, frogs, ginseng, sea cucumber, with a smaller, more nuanced market expanding for bear gallbladder, rhino horn, elephant ivory, pangolins, and big cat body parts. The trade was open. Species within China were hit first. As China's own commercially valuable species declined and domestic enforcement went up, China-based wildlife trafficking businesses ramped up external sourcing from wildlife source countries

where governmental and/or family relations were strongest, including Vietnam, Thailand, Cambodia, and Indonesia. Some ethnic Chinese-run companies in Malaysia and the Philippines with family ties to Taiwan, Hong Kong, and mainland China were supplying China's growing market, as well as their own domestic markets to a lesser degree.

Sourcing Evolution

Representatives of Chinese companies were sent to these emerging source countries to arrange purchase orders, and some business was conducted through companies with direct or indirect family links. For example, Thai-Chinese

As China's own commercially valuable species declined and domestic enforcement went up, China-based wildlife trafficking businesses ramped up external sourcing

and Indonesian-Chinese businesses bred and sourced crocodiles, tigers, macaques, and bears for local and tourist markets in Thailand, Vietnam, Indonesia, Cambodia, and eventually Laos, as well as for the Chinese market.

Live animals and body parts were sent to Yunnan and Guangdong by road, ship, and eventually by air to Kunming, Guangzhou and Hong Kong. In a well-known case, a prominent Thai-Chinese tiger zoo owner was involved in joint tiger ventures in mainland China. Chinese sourcing agents also started expanding their businesses into the Russian Far East.

Meanwhile, due to their governments' more relaxed trade regulations, Taiwan and Hong-Kong based wholesalers were positioned as leading brokers for Chinese importers. Dealers based in Taipei, Taichung, Kaoshiung and Hong Kong sourced wildlife for their own markets, and also for the growing Chinese mainland market, evidenced by the fact that most rhino horns seized by South African authorities in the late 1980s and early 1990s were destined for Taiwan. Investigations in the early 1990s in Taiwan revealed that a minor portion of the smuggled horn was sold to parts of Taiwan's relatively small but more affluent domestic market, whereas the bulk was stockpiled or immediately sold to wholesalers in southern China.³

Business relationships between companies in mainland China and Taiwan were sometimes open and legitimate, and at other times not, due to political tensions. However, actual Taiwanese business flows with China were always brisk. Responding to increased and steadily maintained purchase orders from China, Taiwanese entrepreneurs sourced rhinos, elephants and big cats from Southeast Asia, and increasingly from Africa. As seen in the most recent poaching surges of the 2010s, populations of valuable animals started to plummet in the 1980s due to black market orders that were kept perpetually 'open'—the market was insatiable and every seller could find a buyer. Wholesale buyers speculated on continued demand and increased prices that they could influence, similar to pump and dump stock schemes. Pangolins were sourced and openly shipped from Indonesia, with smaller loads gathered in Cambodia, Thailand, Myanmar, Malaysia and the Philippines. Since prices in pangolins were modest, the volume of trade was also relatively low and seemingly sustainable.

In instances where mainland Chinese companies had their own business or family members placed in source countries, shipments would be arranged directly. Where such direct connections did not exist, Taiwanese brokers often filled the gap. This was especially true in Africa, where China had not yet established a strong presence, and where few Chinese business family links existed.

North Korean Connection

In addition to relying on Taiwanese connections, Chinese companies bought African rhino horns directly from North Korean diplomats who sourced the horn in Zambia, Zimbabwe and South Africa and sent consignments home by diplomatic pouch. Sometimes North Korean diplomats would bring horns directly to Guangzhou for private inspection and subsequent sale to Zhanjiang-based wholesalers. Most deals with a major Chinese wildlife buying company took place at a major hotel in Guangzhou.⁴ Pyongyang's condoning of rhino horn sales was never discovered, but was always suspected, since high-ranking North Korean diplomats were regularly implicated in southern African rhino horn smuggling cases over the years.⁵

The major Chinese importers were state-run or semi-state enterprises. They included wildlife farms that transitioned into zoological parks that had their own animal part processing and

packaging plants. For example, a wildlife product company in Harbin owned a tiger park that was open to public visits. Next door was a plant for processing bones of tigers and other species to make tiger bone wine, pills, and plasters. The bones came from domestic stock, imports (largely South Korean), and were mixed with

North Korean diplomats would bring horns directly to Guangzhou for private inspection and subsequent sale to Zhanjiang-based wholesalers.

cow bone.⁶ The same company bred deer for antlers and musk and processed deer products. A similar, but much bigger park in Guilin eventually housed over 1,000 tigers and 400 bears, with performing shows for the public, and processing plants for

body parts nearby. Both parks were registered with China's State Forestry Administration (SFA).

Another company based in Zhanjiang that had no park or tourist facilities, imported live macaques and tiger carcasses from Vietnam, and rhino horn from Taiwanese dealers. They stored tiger skeletons and rhino horns in warehouses for distribution to apothecary outlets, while sending the primates immediately to SFA CITES holding facilities that contained laboratories for vivisection.

China Expands Direct Sourcing

In the late 1980s, China's own trade regulations started to relax. State-owned companies were encouraged to explore new markets at home and abroad to support the growing Chinese economy. During the early to mid-1990s, professional Chinese black market trade specialists supplying China's wildlife companies were found in the Russian Far East buying tiger skeletons, bear gallbladder, ginseng, sea cucumbers and frogs. These black market supply chain specialists had corrupt Russian police officers on their payroll to facilitate cross border trade. In 2000, a senior Russian police officer was discovered to be receiving \$10,000/month (more than his annual salary) from a Chinese dealer. It was never determined how many degrees of separation there were between these Chinese dealers and the wildlife companies they were supplying.

By the late 1990s, China-based wildlife

companies were expanding operations by setting up facilities and establishing open partnerships in Cambodia and Indonesia. Pre-existing joint ventures with Thai companies also expanded. Vietnamese and Chinese companies compete over sourcing of macaques in Cambodia. This competition expanded to the sourcing of other species across Southeast Asia, with macaque breeding facilities being established in Laos and Cambodia by Vietnamese companies. By the early 2000s the major Cambodia-based macaque facilities were joint ventures formed between a Shenzhen-based company and the Cambodian Department of Forestry. The Shenzhen company eventually set up a holding and breeding facility on Hainan that could hold 10,000 live primates at a time.⁷ Their main investors and clients were the Chinese military, as well as pharmaceutical companies in Europe, USA and Japan.

Enforcement Affects Supply Chains

In the mid to late 1990s, Taiwan, Hong Kong and China started to increase wildlife enforcement in response to harsh criticism from CITES, the United States, and the international community for their brisk unregulated trade in tiger and rhino parts. The US Government invoked trade sanctions related to regulations under the US Pelly Amendment. CITES infraction reports and NGO investigations were used to leverage trade sanctions against both China and Taiwan unless they took remedial measures. The same approach had been taken in 1993-1994 with Thailand, where trade in endangered species and their by-products, such as tiger skins, were conducted openly. Thailand had responded by passing a wildlife law at the last minute before a CITES deadline, barely avoiding a ban on imports of Thai orchids and other legally traded flora and fauna. What was less known at the time was the significant role Thailand was playing as BOTH hub and transit for wildlife trade to China.

Similarly, Hong Kong stepped up interceptions of illegal imports, and cracked down on tiger and rhino derivatives being sold in shops. By the mid 1990s, Taiwan set up its own new wildlife enforcement agency and did a nation-wide blitz against illegal wildlife sales, focusing largely on rhino and tiger products.

In response, the China-based companies and their suppliers stepped up business with dealers and suppliers in Thailand, Cambodia and Laos where regulations and enforcement remained weak.



1993: Chinese wildlife Kingpin based in Zhanjiang bought rhino horn from Taiwanese dealers and North Korean diplomats. (Photo from covert camera by author, for EIA, 1993)

Vietnam: Sub-Contract Role for Chinese Companies

Vietnamese companies licensed to trade in wild animals and forest products focused mainly on filling orders for China, but by the late 1990s, their own domestic market also started to grow. Traditionally a consumer of many wildlife products, Vietnam's consumer base was starting to acquire enough wealth to purchase the more expensive tiger and rhino parts, which were generally cheaper in Vietnam. But their bigger market was still, by far, China.

Members of Vietnamese families that had settled in Laos were positioned as brokers, buying from Laos and Thailand and moving various products to Vietnam. A closer look at the families specializing in wildlife, and other families specializing in logistics (import, export, smuggling) reveals similar roots and family connections to particular geographic areas of Vietnam, especially Than Hoa and Ha Tinh. In many cases, key supply chain members were part of an extended family tree. Although Laos-registered, some companies were run by ethnic Vietnamese or mixed Laos nationals, most of whom spoke Lao, Vietnamese, and Thai and maintained strong family and business connections in Vietnam and northeast Thailand, particularly Nakhon Phanom province. Vietnamese companies established

joint ventures with the Viet-Lao nationals, again through family ties. These 'multinational' Vietnamese teamed up to move wildlife from Thailand (much of which was transiting Thailand from other countries) through Laos and into Vietnam where it was processed or prepared for export to China.

As Vietnam's own economy started to expand, an increasing percentage of imports of pangolin, big cats and rhino horn was sold within Vietnam. Ivory was still largely moved onto China.

Thailand as an International Hub

Thailand has a long history of serving as a cross-border hub for wildlife trade. Prior to the 1993-1994 CITES trade ban threat, Thailand had no national wildlife law. Wildlife farms and zoos could be found all over the country, stocked with tigers, crocodiles, and bears. Many of these facilities were never closed and can still be found today, now registered as zoos. Tiger and leopard skins could be found in the windows of some city shops. Bangkok's Chatuchak (JJ) market was notorious for openly selling species from around the world. Individual buyers and brokers from different countries would visit Thailand to strike their own deals and arrange shipments.

Thai wildlife specialists established collection and holding facilities for some species that would be sold in bulk. Some of these facilities served as private zoos for tourists, while others were closed to the public. For example, a family run business in Chachensao collected snakes, turtles and pangolins on a continual basis, storing them alive in pens and a pond before preparing them for transport on a weekly basis to China, sometimes by air, and other times by road via Cambodia, Laos, and Vietnam. Wildlife

Purchases in pangolins became tied up with purchases in tigers because the clients (Laos and Vietnam-based companies) were constantly filling orders for these two species.

restaurants in Thailand, Cambodia, Laos and Vietnam would also place orders and purchase part of these shipments.

Thai traders once sourced pangolins in Thailand, but as pangolin populations in Thailand decreased, they sourced increasingly from Indonesia and

Malaysia. Purchases in pangolins became tied up with purchases in tigers because the clients (Laos and Vietnam-based companies) were constantly filling orders for these two species inside China. Therefore, mixed shipments of pangolins and tigers were often observed. Thai dealers would arrange purchases of tigers from Malaysia when placing orders for pangolins. Pangolins were shipped live because live animals fetched a higher price per kilo. Transporters were taught to hydrate the animals and even feed them powdered meal to keep body weight (and therefore sales price) up during the long road trips that could stretch from Indonesia, through Malaysia, Thailand, Laos, Vietnam, and China.

But if an order for a tiger came through, suppliers were not always ready. In these cases, the Thailand-based purchaser (broker) had three choices:

- Wait for tigers from Malaysian suppliers. In this case they risked losing the sale to a competitor, but could probably sell the tiger later;
- Link up with local Thai poachers. However, Thailand's wild tiger population was rapidly

decreasing, and counter poaching was increasing, so this method was not a guarantee of success (years later the supply chain would adapt); or

- Purchase from a Thai tiger farm. This was a sure bet, but tiger farms would charge more than a poacher to cover their overheads.

International wildlife NGOs became more active in Thailand in the early 2000s, which meant Thailand's wildlife trade was more publicly scrutinized in international media and forums. Thai officials complained about this, but they also responded with more action. Wildlife enforcement started to increase as police joined Department of National Parks (DNP) officers on raids.

Wildlife traders reacted by tightening ties to smuggling specialists to get their product safely to their buyer; some of today's most notorious traffickers and brokers came into prominence at this period. Vixay Keosavang, an ethnic Vietnamese Laotian citizen established his Xaysavang Trading Company (XTC) in Laos, using financial and technical support from a Chinese company and strong ties to local government. XTC was an import-export company and ran government-sanctioned wildlife breeding facilities that were authorized to breed and export pangolins, tigers, turtles, snakes, as well as other species. Laos was just preparing to become a member of CITES, so the trade in these CITES-listed species was not viewed by local officials as a problem. These breeding facilities were in fact laundering mechanisms

Meanwhile, Thai national Leuthai Teucharoen (aka "Fatty"), a regular supplier to Keosavang, teamed up with the infamous Thailand-based, Vietnamese Bach brothers around 2002 to move \$20,000 worth of wildlife a week to Laos.⁸ The Bachs, a Vietnamese family, used Thai nationals to register several companies in Nakhon Phanom and Bangkok, and would arrange for the product (tigers, pangolins) to move from the Thai-Malaysian border or from the Bangkok metropolitan area to Laos. In Laos, the Xaysavang Trading Company would receive and store the goods.

Another Laos-based breeding facility was located 32 km outside of Thakek in Suwannakhet Province near the Mekong River, across from Nakorn Panom where the Bachs were based. Taiwanese businessmen were originally involved in helping to set up and stock the Thakek facility.⁹ This facility also bought tigers from Thailand's Tiger Temple in Kanchanaburi to increase its breeding

stock.¹⁰ The Thakek tiger facility, formerly called “Muang Thong”, eventually hosted hundreds of live tigers. Upon order, farm staff would lethally inject a tiger, dismember it, then prepare it in a body bag for export for \$30,000/carcass.¹¹ At one point Muang Thong was selling at least 100 tiger carcasses a year to customers in Vietnam and China.¹² When Thai traders like Fatty learned what prices Muang Thong was charging, they tried to compete by buying more wild tigers from Malaysia and selling them to Laos-based Vietnamese dealers for a significantly lower price. In other words, there was a direct correlation between expanding tiger breeding operations and increased poaching of wild tigers.

Laos: Trafficker Haven and Entrepôt

As with the China-based and Vietnam-based companies, Laos-based companies involved in wild animal trading were legally registered with the government to trade in animals, plants and sometimes other commodities (like limestone). The Laos government taxed these companies as legitimate businesses and made them pay an extra 2% to Customs for each shipment of wild animals based on the value of the animal – per head or kilo. The pricing scheme was listed in US dollars. This practice of paying Laos Customs was standard for many forms of trade in Laos order to incentivize officers to process paperwork more efficiently. With individual wildlife shipments valued in the hundreds of thousands of dollars (and sometimes millions), Customs officers worked more efficiently. Some would even help unload shipments of poached



Once a common scene: Thai Highway Patrol Police Seize Tigers Smuggled from Malaysia in Pattani in 2009 (Photo by Freeland)

wildlife from Thailand as it was moved openly across the Mekong River into Laos.¹³

Some personnel running these Laos companies had family ties not only to Vietnam, but also to southern China, especially in Yunnan and Guangdong.

Traffickers Adapt to Increased Thai Enforcement

The quasi-official sanctioning of wildlife trafficking in Laos had a knock-on effect in neighboring countries. Even though Thailand's enforcement increased, its law was still weak and corrupt officers both protected and extorted supply chains. A virtual smuggling toll-way existed between Thailand's official border points, including road checkpoints, seaports and airports. Interdictions in Thailand went up between 2000-2002 but smuggling continued. Seizures piled up and the media encouraged it with guaranteed photo ops. Corrupt officers asked wildlife dealers for more money and would no longer guarantee passage.¹⁴ In response, smuggling specialists helped wildlife traders adapt in a variety of ways, including:

- Paying government officers more for transport facilitation
- Diversifying trafficking lanes (i.e., sending shipments through different channels, sometimes at the same time)
- Paying government officers to recover and return confiscated items
- Sending shipments through Cambodia

In late 2003, Thailand launched a “war on wildlife crime”, backed by the Prime Minister and inspired by the Queen of Thailand's August birthday speech, in which she lamented about the wildlife trade situation. Interdictions and raids skyrocketed over 3 months. It was the first serious wildlife enforcement campaign ever in Thailand. Malaysia-based suppliers adapted by flying their wild cargo over Thailand to Laos and bypassing enforcement on the ground. Pangolins, tigers, turtles, and snakes were flown from Malaysia to Laos for \$20,000 a run on private cargo charter flights.¹⁵

Once wildlife made its way into Laos, it was deposited in warehouses and animal care holding facilities, where company officers recorded the heads, kilos, and corresponding



Google, Digital globe: Location of Laos Breeding Facilities: located near official and unofficial border crossings.

price of the stock. Stock would then be exported to Vietnam, usually through Lak Sao, or directly

...there was a direct correlation between expanding tiger breeding operations and increased poaching of wild tigers.

to China by road or air. Usual contracts, airway bills, and eventually CITES permits, and other documents would accompany the shipments. Eventually, the Thai enforcement campaign died down, and

smuggling, occasional interdictions, and corrupt payments resumed.

Enforcement Up, Supplies Down: Asian Traffickers Look to Africa

By the early 2000s, rhino, big cat, and elephant populations in Southeast Asia were too thin for wildlife sourcing specialists to justify targeting. Rhinos in South Asia – Nepal and northeast India (Assam) – were an exception, with dense populations. Southeast Asia-based supply chains were not detected sourcing rhino horn from those two areas in a sustained way, since these areas were directly connected by established trade routes to China. In addition, both Assam and Nepal had (unofficial) shoot-to-kill practices

against rhino poachers, and Southeast Asian dealers lacked local connections. Other species, however, were hit, evidenced by the presence of big cat body parts sold along the India-Myanmar and Myanmar-Thai border markets.

Elsewhere, poaching had taken its toll. Most rhinos were extirpated from their Southeast Asian range. Elephant herds could still be found, but the big tuskers had been wiped out. Tigers could hardly be found at all in China, Myanmar, Cambodia, or Laos, while some poachers still got lucky finding them in Thailand and Malaysia. Tiger farms became a regular source of the trade, but prices were escalating to cover farm overheads. Pangolins, although heavily traded, were still somehow found across parts of their range, especially in Indonesia. But their numbers were visibly declining, especially in Cambodia, Thailand, and Myanmar, and they could rarely be found in Vietnam. Pangolins could not be transported live from South Asia, but seizures of scales from Nepal, India and Pakistan started increasing.

To maintain their businesses, Laos-based brokers started looking more to Africa for elephant tusks, rhino horns, pangolins, and big cats to feed the steady and growing Chinese and growing Vietnamese markets. By 2005, adventurous wildlife specialists like Thai national Chumlong Lemthongtai (“Chai”) and an unnamed Laos national traveled to Africa on behalf of XTC to source these animals and to get personally rich through company sales commissions. Chai and the Lao dealer established



On May 11, 2016, Freeland LMED, Field Ops and Communications staff met with rangers that had received PROTECT training for validation purposes. They shared a recent seizure from a nearby wildlife product shop, including orangutan skulls, pangolin skin, turtle, sun bear skull and paw, hornbill beaks and more

relationships with traders in South Africa and Mozambique respectively, venturing out further to other countries too. Chai supervised a team of Thais and Vietnamese in South Africa, where

...a team of Thais and Vietnamese in South Africa...teamed up with local game farmers to illegally exploit legal safari hunting businesses in lions and rhinos.

they teamed up with local game farmers to illegally exploit legal safari hunting businesses in lions and rhinos. Chai was using the logistics services of the Bach family to move rhino horn, lion bone and elephant tusks through Thailand to XTC in Laos

on a regular basis. He was eventually arrested by the South African Revenue Service in 2011.

From prison, Chai admitted that he paid a fixed fee to a logistics broker in Bangkok to guarantee clearance of his products through Bangkok's old Don Mueang International Airport. Chai also paid commercial airline officers to carry and monitor

wildlife cargo. By 2012, with Chai behind bars, the other Lao dealer continued to travel to Maputo to sponsor Mozambican hunts of South African rhinos, and then arranged for the horn to be smuggled from Mozambique to Bangkok via Nairobi or Addis Ababa airports, using a regular rotation of Vietnamese couriers. In Bangkok, the Lao dealer paid an officer in a major Southeast Asian airport a fixed fee for clearance of the shipments.

CCTV-monitored inspections in Bangkok's more modern Suvarnabhumi Airport warranted increased corrupt-official protection from the detection of illicit cargo. Between 2006-2008, Thai Customs interdicted a number of large consignments of elephant tusks and a small portion of rhino horn shipments. Traffickers adapted by moving more tusks by maritime cargo, and by paying airport police to escort baggage containing rhino horn through Customs checkpoints.

Investigations into Chai's and the other dealer's respective activities in Africa reveal other Asia-based reps working there too. Starting in 2003, Vietnamese, Malaysian and Lao nationals belonging to major supply chains operating in Southeast Asia and China were observed doing

business in South Africa, Mozambique, Uganda, Togo, Ghana and eventually other African

African-owned companies in Bangkok have been involved in smuggling wildlife into Southeast Asia since at least 2011, importing elephant tusks and pangolin scales, while using gemstone and other commercial trades as cover.

countries. The names of Laos companies, as well as people associated with them, are listed on African government CITES export documents relating to pangolins and lion bones, as well as rhino horn (for sport hunting trophies).

In early March 2013, Vixay Keosavang was publicly exposed as a wildlife

trafficking kingpin by Freeland in the international media, and then by the Thai Police in a press conference the following week. Within months, Keosavang had largely disappeared from the scene. Meanwhile, other members of the syndicate took a more active role in supervising operations. The Bachs continued to supervise the supply line, while Keosavang himself, as well as his deputy dealers, carried on negotiations for purchase and sales. Company names



PROTECT Training Course 2013/ NGOs helped step up enforcement in Thailand and Cambodia starting in 2000 (Photo by Molly Ferrill/ Freeland)

were changed. The bulk of business operations were moved under a separate company, which maintained significant government-sanctioned export quotas.

African and Asian Dealers Connect

No later than 2013, African wildlife dealers were similarly seen showing up in Asia, including in Thailand, Laos, Vietnam and China to close deals with Asian dealers and collect their payments. Discussions between the African and Asian dealers reveal distrust and an anxiety about payments. Both sides were always pushing the other for money and product, playing cat and mouse. They were also looking for ways to cut out layers of middlemen and find original sources and buyers in order to speed up delivery and increase their own profit margins.¹⁶

2010-Present: Disruption and Displacement

Lately, major trafficking businesses are focused on large-scale collection of Africa-based wildlife. Stepped up counter-poaching efforts in some countries, most notably South Africa, has not stopped poaching efforts, but it has displaced them. Poaching gangs can be found moving from one heavily guarded park to a less guarded one, while similar gangs can be found doing surreptitious deals with farms holding stocks of dehorned rhinos.

Increased enforcement in one area has continually displaced poaching and trafficking to other areas because the demand remains high and, very importantly, the trafficking businesses remain strongly intact. These businesses have remained intact and adapted through:

- Contracting criminal smugglers to ensure safe passage across the supply chain
- Increased corrupt protection at ports, albeit more expensive than before
- More direct Chinese business engagement inside Africa and Laos

African-owned companies in Bangkok have been involved in smuggling wildlife into Southeast Asia since at least 2011, importing elephant tusks and pangolin scales, while using gemstone and other commercial trades as cover. They sell gemstones in Thailand (Bangkok and



On December 18, 2015, Thai customs seized body parts representing 140 poached African elephants and well over 1,000 African pangolins, which were concealed in freight marked as “wigs” traveling from Nigeria to Laos via Singapore and Thailand. The body parts have a market value of 40 million baht (US\$1.1 million), and aroused suspicion among Customs officers at Samui International Airport because the boxes weighed over 1,200kg in total – much more than they would have had they contained wigs. (Photo copyright: Freeland/Alex A)

Chonburi), Hong Kong and mainland China. These companies are largely owned and run by Africans claiming Mali and The Gambia as their nationality.

and elephant tusks – reveals they have not paid taxes for years. They also changed their company name three times in four years.

One major Africa-based supplier to these Bangkok-based African owned companies and to Laos-based companies was Liberian national Moazu Kromah who was arrested by Uganda authorities on June 12, 2019 and expelled to the United States for prosecution in New York. US for wildlife related charges (as part of a larger case targeting other suspects who were also charged with heroin trafficking).¹⁷

Another Bangkok-based African trader, Gambian national Sainey Jagne, arrested by Thai police in March 2017 for importing ivory disguised as gemstones through Suvarnabhumi Airport, is linked to an alliance of Malawi-based Chinese and Gambian businessmen who are being pursued by local police and Interpol for wildlife trafficking.

A cursory look at one African-Thai company based in Bangkok – suspected of being behind some of the larger seizures of pangolin scales

Evolution of the Counter-Wildlife Trafficking Response

In this section we chart the progress of counter-trafficking efforts in Southeast Asia.

Networks to Counter Trafficking Networks

What have Southeast Asian and Chinese enforcement authorities done to address wildlife trafficking supply chains?

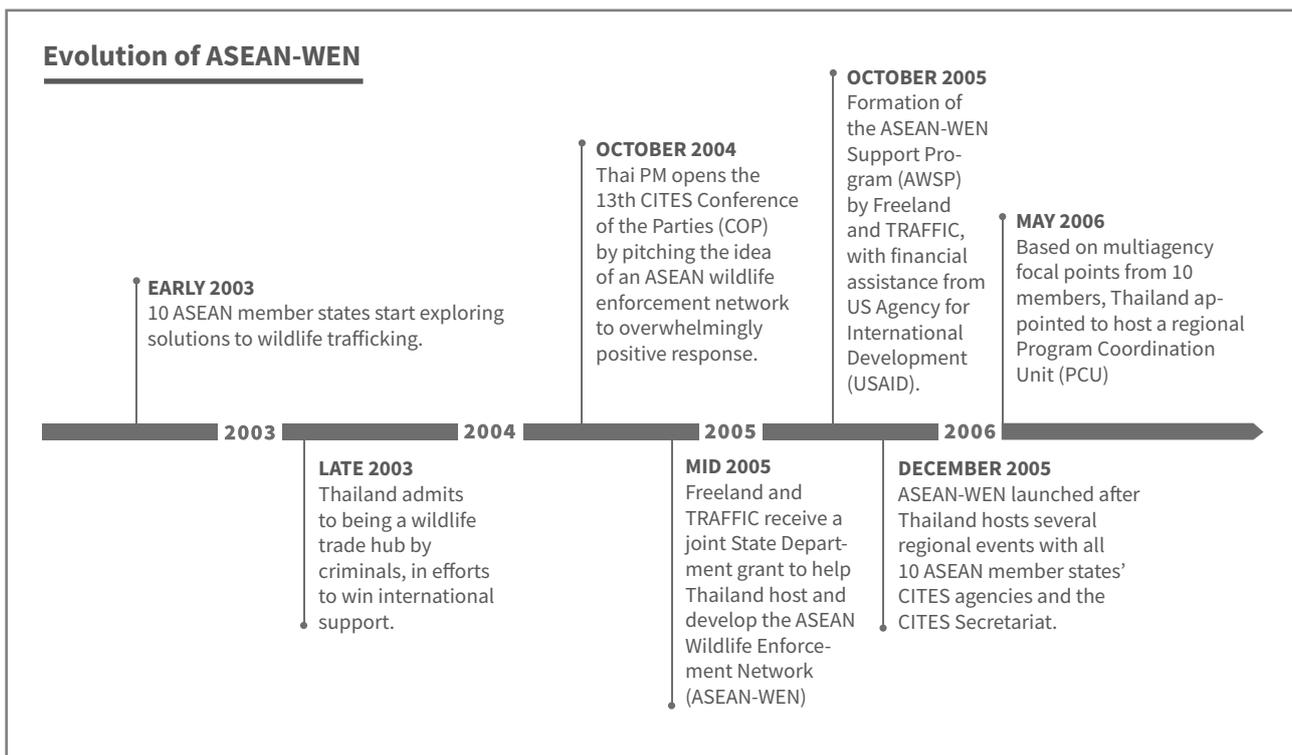
When Thailand realized it could not eliminate wildlife crime in a three-month enforcement campaign, it teamed up with ASEAN member countries to launch and develop a regional response, charted in the timeline below:

Each member committed to forming multi-agency 'WEN' task forces, with CITES focal points volunteering to coordinate the national WENs. However, the CITES Secretariat Enforcement Officer and Interpol criticized the members for not understanding the need for police to lead this law enforcement network. CITES officers were notably offended and appeared determined to prove them wrong.



South African lion bones in transit at Bangkok Airport, en-route to Vietnam (Photo by Onkuri Majumdar/Freeland)

For the following nine months, NGOs Freeland and TRAFFIC working alongside the US Fish and Wildlife Service Office of Law Enforcement, US Department of Justice, US Forest Service, as well as the ASEAN Center for Biodiversity assessed:



- The threats to wildlife in each country
- Each country's capacity to mitigate that threat

Following the assessments, Task Force designs and accompanying training programs were created and offered to Thailand, Malaysia, Cambodia, Laos, Vietnam, Indonesia and the Philippines. Freeland and TRAFFIC also helped to develop and worked alongside the Program Coordination Unit (PCU) of the ASEAN-WEN to train national, multi-agency task forces to tackle wildlife crime from source to border to market.

ASEAN-WEN and Its Working Groups

Starting in 2007, the national WENs met annually to report on progress against their regional ASEAN-WEN Strategic Action Plan (SAP). Freeland and TRAFFIC observed the majority of these meetings and presented their own progress for assisting the national WENs. National presentations about the state of wildlife crime and their response were initially rudimentary, and at times un-sourced, but later became increasingly open and rigorous with respect to poaching, trafficking, CWT capacity and needs. Member states borrowed lessons from each

other and requested help from the ASEAN-WEN Support Program. The PCU provided secretarial functions with the Support Program officers sitting in its office and subsidizing its personnel and travel costs for over five years. Police and

National presentations about the state of wildlife crime and their response were initially rudimentary, and at times un-sourced, but later became increasingly open and rigorous with respect to poaching, trafficking...

Customs joined CITES counterparts at the annual regional meetings. Notably, Singapore was the only country whose police did not join these meetings.

As ASEAN-WEN Support Program subsidies for annual meetings gradually tapered off, starting in 2010 (year 4), police presence tapered off

too. This indicated how police agencies across ASEAN had yet to list wildlife crime as a priority work-plan issue, and as such, had not created travel budgets to meet other police focal points to discuss this issue. CITES focal points, on the

ASEAN-WEN Working Groups		
<p>CAPACITY BUILDING GROUP</p> <ul style="list-style-type: none"> ▪ Met only twice, alongside annual regional meetings (In Laos and the Philippines in 2007 and 2010, respectively) ▪ Support Program jointly ran this group with the PCU, reflected by the presence of foreign instructors ▪ ASEAN training pool was difficult to form without an ASEAN-led working group 	<p>SPECIAL INVESTIGATIONS WORKING GROUP</p> <ul style="list-style-type: none"> ▪ Met frequently ▪ Participation expanded to China and Africa ▪ Led by law enforcement officers who worked with the ASEAN-WEN Support Program to create Operation Cobra, the world's then largest cooperative wildlife enforcement operation 	<p>SUSTAINABILITY WORKING GROUP</p> <ul style="list-style-type: none"> ▪ Met multiple times, each time falling short of a consensus on jointly financing the PCU ▪ Received opposition from Malaysian officers regarding the optics of Thailand hosting ASEAN-WEN's Secretariat with support from the USA ▪ Impacted by political factions within Thailand itself ▪ Impacted by lack of presence of senior level officers from ASEAN member states who could sign off on sustained extra budget for a regional program

China's Engagement with ASEAN-WEN



other hand, were able to use their AEG (ASEAN Experts Group on CITES) travel budgets and tacked the AEG meeting onto the ASEAN-WEN meeting. Customs consistently continued to join the meetings.

ASEAN-WEN occasionally updated their SAP, which was to be carried out by national WENs and three regional working groups:

The Sustainability Working Group's challenges were not new to ASEAN. They were usually addressed by the injection of foreign funding until one or more states decided to institutionalize and budget for the program.

Capacity Building with ASEAN-WEN

CWT capacity rose from low to basic across the region. Freeland and the ASEAN Center for Biodiversity (ACB) designed a counter-poaching program for rangers called PROTECT. In partnership with the US Fish and Wildlife Service, Freeland designed a counter-trafficking investigations program for police and Customs called DETECT. TRAFFIC designed a legal awareness program for judges and prosecutors and a species ID program for all agencies. Over the following eight years, over 4,700 officers from Police, Customs, CITES, Forestry, Environment, and judiciary related agencies were trained.

DETECT was adopted by the national police academies of Thailand, Vietnam, Indonesia and Cambodia (partially). DETECT training courses led to Special Investigation Group (SIG) meetings for international enforcement collaboration on specific investigative themes.

Phase II of ASEAN-WEN Support – the ARREST Program

The ASEAN-WEN Support Program led to the USAID-funded ARREST (Asia's Regional Response to Endangered Species Trafficking) Program in 2011, focused on graduating basic frontline capacity to the ability to manage counter poaching and counter trafficking operations for the next five years.

Under ARREST, trial efforts were run in specific geographic or thematic areas to observe what could work for broader scaled counter wildlife crime efforts in Asia. ARREST also added a demand reduction component.

China's Interest in ASEAN-WEN

In the meanwhile, China's wildlife focal point, State Forestry Administration (SFA), had taken an immediate interest in ASEAN-WEN. SFA had previously struggled to improve cross border CWT collaboration without official focal points in neighboring countries, and welcomed ASEAN-WEN as a coordinating mechanism.

SFA even developed a wildlife enforcement manual modeled after ASEAN-WEN's counter-trafficking program, DETECT, which they presented, with a printed credit to ASEAN-WEN. ASEAN-WEN's PCU and Freeland discussed methods to capitalize on China's desire to engage.

Eventually, USAID agreed to support travel needs for a SFA officer to be stationed at the PCU in



Examples of Freeland's PROTECT Course in Action (Photos by Freeland)

Bangkok for three months. China responded through self-funding its path to the SIGs, where it started to play a more active role. The SFA then planned to host ASEAN-WEN 2012 in China.

Operation Cobra I

By January 2013, the SIG participants met in Bangkok and hatched Operation Cobra. Chinese SFA, Chinese Police, USFWS, ASEAN-WEN, LATF, WCO and select African and South Asian countries convened for twenty-six days at the Thai Royal Thai Police National Environment Department. When it was completed, Operation Cobra racked up seizures and arrests related to:

- 6,500kg elephant ivory
- 1,550kg shatoosh
- 42,000kg red sander wood
- 31kg elephant meat
- 22 rhino horns and 4 rhino horn carvings
- 10 tiger and 7 leopard trophies 2,600 live snakes
- 324 hornbill beaks
- 102 pangolins & 800 kgs pangolin scales

Operation Cobra II

In 2014, Operation Cobra II commenced and progressed to three hundred arrests. During Cobra II, SIG participants elected to use the World Customs Organization (WCO) CENcomm as their secure information sharing system.

Operation Cobra III

Cobra ran a third time in 2015, led by Interpol. Noting strong interest in further advanced training, Freeland developed DETECT-Intelligence, which was produced under the US Government sponsored ARREST-Asia and ARREST-Africa programs. Freeland then developed DETECT-CTOC (Counter Transnational Organized Crime) to meet the needs for a wider and complex supply chain analysis and disruption effort.

Overall CWT Results (2006-2016)

With ASEAN-WEN, Asian CITES agencies were no longer fighting wildlife crime alone as Police and Customs were took greater interest.



SIG participants trained jointly together and planned Operation Cobra (Photo by Freeland)

Wildlife trafficking was frequently openly reported in government statistics and the media. Counter-poaching improved in some hotspots. Officers were motivated to stop and seize international shipments in order to score PR and promotion points with their supervisors, who were keen to demonstrate their country's commitment to CITES and ASEAN. Consequently, wildlife supply chains moved away from Asian targets, expanded to Africa, adapted and carried on.

The collective results of ASEAN-WEN at the regional and national levels are summarized as follows:

- Seizures skyrocketed 9-fold across the region, specifically in Malaysia, Thailand, Cambodia, Vietnam
- Enforcement cooperation between ASEAN-WEN members and China increased
- Arrests and prosecutions increased in Thailand, Malaysia and the Philippines
- Enforcement cases increased from a low baseline to 1,243 reported cases between 2008-2014. Peaks were achieved during SIGs (Cobras) when an additional 551 cases were opened and pursued
- Over \$100 million in assets were seized from 2008-2015. Large seizures continue to take place and increased between 2015-2017. Due to the SIGs, since September 2016, major players in both Asia and Africa started to get arrested
- Poaching decreased in Asian landscapes where specialized training and units were activated (eg: Thailand and Indonesia)

- Poaching increased in African landscapes, where enforcement was weaker and undermined by rampant corruption.

As ASEAN is based on consensus, it only takes one out of ten members to veto a motion. For nine years, Malaysia cast that vote of opposition. When Malaysia finally agreed to join the majority to support a sustainability plan – which consisted of each member state committing approximately \$15,000/year to the PCU – a new and surprising vote of opposition appeared: Thailand.

Domestic Thai politics had stifled a regional initiative. USAID, after ten years of support, lost interest in ASEAN-WEN.

ASEAN Beyond 2020 – Which Direction Can CWT Efforts Go?

In this section, we examine the current state of trafficking networks and counter- trafficking agencies, as well as suitable networking mechanisms.

Current Status of Illicit Trafficking

Due to increased attention on wildlife crime, today's trafficking situation in key countries can be characterized as:

- Higher risk
- More sophisticated
- Gold rush type operations involving familiar syndicate-backed companies placing orders, wildlife specialists filling them through extensive networks, and professional smugglers paid to circumvent or co-opt enforcement to ensure steady flow of product through clever smuggling techniques
- Trade based money laundering schemes
- Payoffs to corrupt government and private sector officials

Why Illicit Trafficking Chains Continue

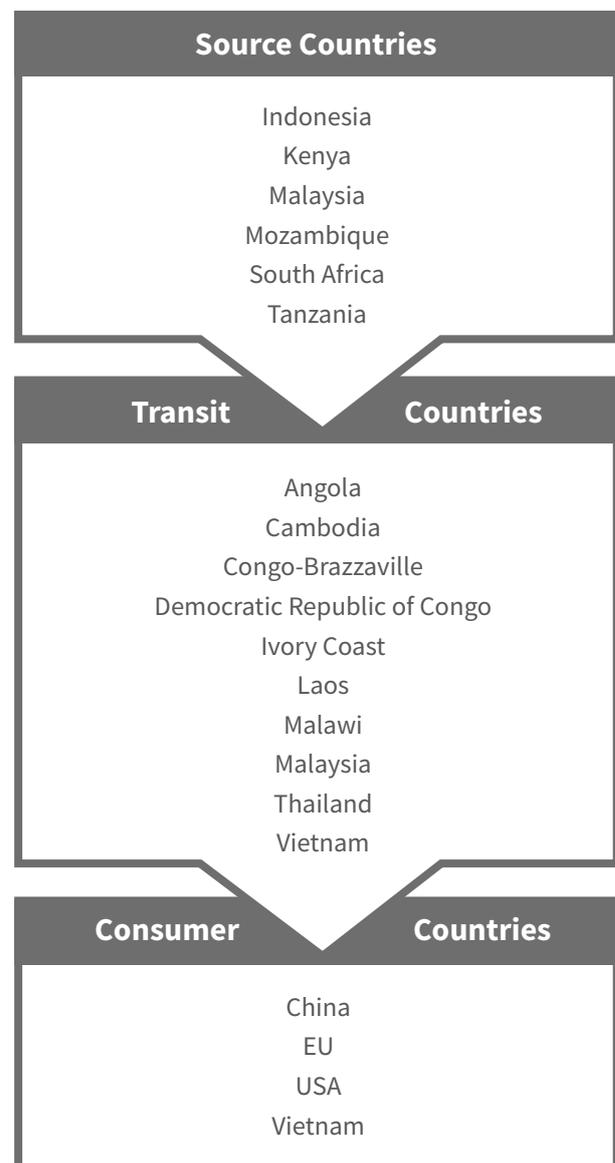
With increased official and NGO spotlighting on wildlife trafficking, supply chains have been disrupted, but are yet to be broken. These are the reasons why:

- **Robust supply chains:** are still well protected and arrested members are quickly replaced with other capable players.
- **Demand for product continues:** the nature of this demand must be studied more closely by getting accurate insights from traffickers to ascertain whether they are stockpiling most of the product, what percentage is being stockpiled as a futures commodities, and what percentage is going straight to market.
- **Law enforcement officers are busy and underfunded:** it is difficult for them to take on extra work without incentive. Case reporting is laborious, and positive reward is not

always given. Furthermore, financial support for operations is depleted well before supply chains are dismantled.

Main Countries in the Africa-ASEAN Supply Chain

Some countries and regions play key roles:



Priority Agencies in Key Countries

The following agencies should be included in all CWT efforts, including joint regional trainings, networking events, information sharing mechanisms and policy discussions¹⁸:

- **Cambodia:** Anti-corruption; Ministry of Public Security; Financial Intelligence Units; Cambodia-WEN (Wildlife Rapid Rescue Team); Customs; Attorney General; Gendarmerie Royale Khmer
- **China:** Ministry of Public Security (Customs Anti-smuggling); China-WEN; Financial Intelligence Units
- **Congo-Brazzaville:** Attorney General, Anti Money Laundering
- **Democratic Republic of Congo:** Attorney General, Anti Money Laundering
- **Indonesia:** Anti-corruption; Indonesian National Police; Attorney General
- **Kenya:** Ethics and Anti-Corruption Commission; Kenya Wildlife Service; Attorney General; Ministry of Public Security
- **Laos:** Anti-corruption; Ministry of Public Security; Lao-WEN (Department of Forest Inspection); Financial Intelligence Units; Ministry of Foreign Affairs; Attorney General.
- **Malaysia:** Anti-corruption; Department of Wildlife and National Parks; RNP; Customs; Financial Intelligence Units
- **Mozambique:** Anti-corruption; Ministry of Public Security; Customs; Financial Intelligence Units; Attorney General; Ministry of Foreign Affairs
- **Nigeria:** Anti-Counterfeiting Collaboration and Anti Money Laundering
- **South Africa:** Anti-corruption; South African Police Service; South African Revenue Service; Department of Environmental Affairs; Attorney General; Ministry of Foreign Affairs
- **Thailand:** Anti-corruption; Royal Thai Police /Central Intelligence Bureau; Anti Money Laundering Office; Customs; Attorney General.
- **Vietnam:** Anti-corruption; Ministry of Public Security; Customs; Financial Intelligence Units; Attorney General.
- **USA:** Fish and Wildlife Service, Homeland Security Investigations

Networking is Key

Pitting the enforcement chain against the major supply chains, one may see an uneven battle. But there is significant progress to build on, including:

- Wildlife crime is higher priority issue
- Fighting corruption is more of a priority
- Basic capacity and understanding about wildlife crime exists
- Cooperative linkages have made between Asia and Africa

Best Platforms and Mechanisms to Sustain and Improve CWT Networking

While ASEAN-WEN jump-started Asia-Africa enforcement cooperation, it now plays a lesser role, due to donor fatigue. National WENs in some countries have continued to remain active and mature. International Organizations, especially Interpol and the United Nations Office on Drugs and Crime (UNODC), have created new parallel networks like WIRE (Wildlife Inter-Regional Enforcement Meeting). INTERPOL created its own SIG called the RIACM (Regional Intelligence and Analysis Cooperation Meeting).

China was comfortable and engaging with ASEAN-WEN, but its own multi-agency contingent was dominated by SFA (CITES), which acted as the gatekeeper to other Chinese agencies. Chinese Forest Police reside in SFA. In addition, Chinese Customs Anti-Smuggling Unit is now emerging as a strong new player in China's CWT effort and is engaging enforcement agencies and NGOs globally to cooperate on CWT.

Clear potential synergies exist. INTERPOL convenes multiple countries for species-specific operations. UNODC is focused on bringing prosecutors and police together from some of the same countries under WIRE. Neither organization involves ASEAN-WEN as a co-host when operating in Southeast Asia. As both Interpol and UNODC are dependent on the same donors that used to support ASEAN-WEN, it is not clear how they plan to sustain their respective efforts. ASEAN-WEN's "SIG" remains and has been widened and replicated. However, the SIG is also dependent on donor support.

Thus, the options for CWT networking mechanisms, including their strengths, weaknesses,



Ivory Seizure April 2016 (Photo by Alex A/ Freeland)

and recommended roles are:

ASEAN-WEN:

- **Strength:** National WENs are active in Thailand, Laos, Cambodia, Philippines, and China.
- **Weakness:** Regional operations dependent on donors. PCU is suspended. Police may join INTERPOL and UNODC efforts instead.
- **Recommendation:** Challenge ASEAN-WEN to self-finance and tie up with INTERPOL and ASEANAPOL for joint SIGs and regional trainings.

ASEANAPOL

- **Strength:** Local Police network shares focal points with Interpol NCBS.
- **Weakness:** Un-tested in CWT.
- **Recommendation:** Encourage it to establish a role with ASEAN-WEN and INTERPOL on CWT and include it in key CWT events and operations.

INTERPOL

- **Strengths:** Good convening power with all agencies in enforcement chain. Experienced in CWT.
- **Weakness:** Historically not ineffective in Southeast Asia. But new, bigger presence in the region will likely make it more effective by 2021.
- **Recommendation:** Position INTERPOL, ASEAN-WEN and ASEANAPOL as co-hosts of SIGs and trainings. Encourage donors and IOs to foster this relationship.

UNODC

- **Strength:** Good relations with ASEAN Senior Officers' Meeting on Transnational Crime and prosecutors.
- **Weakness:** Duplicating efforts of Interpol and ASEAN-WEN SIG.
- **Recommendation:** Tie up with INTERPOL and ASEAN-WEN. Help increase prosecutor and non-traditional agency roles in CWT.

CHINA

- **Strengths:** Main consumer. Will be more compelled to dismantle China-based syndicates if Chinese government plays a leading CWT regional role. Chinese enforcement agencies have the competence to mentor ASEAN law enforcement agencies.
- **Weakness:** Getting Chinese Ministry of Public Security and Customs to play more of a leading CWT role instead of playing back seat to SFA on international CWT. This change appears to be happening, with China Customs taking a more active role.
- **Recommendation:** Engage China in whatever networking direction ASEAN goes.

Strategic Recommendations

In this section, we explore specific priority actions to be taken.

Strategic Approach

Against the background of competent and emerging agencies and regions, our recommended strategic CWT approach is to:

- a) Build off the basic foundation of capacity and awareness laid to date;
- b) Focus on enabling stakeholders to target vulnerable nodes in illicit wildlife trafficking supply chains – from the original crime scene to the financiers sponsoring the kills; and
- c) Share information with China (Ministry of Customs and Ministry of Public Security),

which can open up rear flank attacks on major Chinese financiers and importers.

Through this methodology, supply chains can be broken one link at a time, eventually sending these criminal businesses into cascading failures. By achieving successes, one step at a time, stakeholders will be motivated to sustain and improve their efforts, while passing on results-based methods to others. Lessons and successes can be captured and migrated to local partnering institutions that will continually adapt and sustain CWT capacity building for Southeast Asia and China into the future.

The key steps may be summarized as follows:

1 **ENGAGE NON-TRADITIONAL AGENCIES IN CWT:** Improve, increase and institutionalize participation of counter-corruption, money laundering and financial investigation stakeholders, and enhance networking.

2 **TRAIN AND OPERATIONALIZE TRAIN MULTI-AGENCY TEAMS IN SUPPLY CHAIN ANALYSIS AND DISRUPTION:** Enable stakeholders to teach the other, provide specialized training, and offer On-the-Job mentoring to operations teams.

3 **MAKE CWT REWARDING:** Use asset forfeiture, restitution funds and technology to empower persons to report wildlife crime and be rewarded.

4 **USE ASSET FORFEITURES AND SEIZURES:** Form conservation restitution funds that reward successful enforcement and finance wildlife recovery programs.

5 **FOSTER SUPPORT FOR LAW ENFORCEMENT FROM CIVIL SOCIETY:** Ensure the media remains focused on CWT, as well as encourage citizen-science participation and greater information sharing among NGOs and law enforcement.

6 **USE TECHNOLOGY:** Make digital summaries of laws and species ID, introduce machine learning tools and training to significantly improve digital intelligence capacity.

7 **REDUCE DEMAND:** Implement behavior change campaigns to change the minds of traffickers and consumers.

The summary points above are discussed in detail in the following sections.

1. Engage Non-Traditional Agencies in CWT

Financial Crimes (AML, Tax)
<p>GOAL: Identifying grounds and means to pull licenses for companies behind the supply chains, fine and arrest their owners, seize assets</p> <p>STAKEHOLDERS: FIUs, Tax Inspectors, Anti-money Laundering agencies</p>
Special Police Agencies
<p>GOAL: Launching multipronged investigations into wildlife crimes, focusing on other crimes committed by the same traffickers</p> <p>STAKEHOLDERS: Narcotics, anti-terrorism, human trafficking, cyber crime bureaus</p>
Attorney Generals
<p>GOAL: Identifying multiple laws to use against legitimate companies that are a cover for wildlife trafficking</p> <p>STAKEHOLDERS: AGs of Thailand, Philippines, Malaysia, China, Vietnam</p>
Anti-corruption
<p>GOAL: Mitigation of corruption in supply chains including arrests of corrupt officers and deterrence for others</p> <p>STAKEHOLDERS: Anti-corruption agencies and legislative oversight committees enforcement and finance wildlife recovery programs</p>
Engagement with China
<p>GOAL: Have China play a key role in collaborative investigations with ASEAN</p> <p>STAKEHOLDERS: China Customs</p>
Link to other trafficking enforcement
<p>GOAL: Enabling officers to collaborate at a national and regional level towards the common objective of dismantling distinct targets (SIGs).</p> <p>STAKEHOLDERS: INTERPOL, ASEAN-WEN, ASEANAPOL, LATF, China, USA.</p>

While many observers and organizations continue to push for cross-border cooperation, most governments need to strongly focus first on cross-agency cooperation. Conventional stakeholders along the enforcement chain, including Police, Customs, CITES and rangers have received enough training and exposure to CWT. However, new stakeholders require enticement and mandates to join the CWT effort, as well as introductions to the challenge. Further-

more, a cohesive multi-agency strategy must be developed and orchestrated with authority and care.

Requirements for activating new CWT stakeholders:

- FIUs and Tax Inspectors:** most besides Thailand have not been engaged, trained, or invited to participate in WENs, SIGs or operations. The Asia-Pacific Group on Money Laundering (APG) has encouraged its member country FIUs and banks to engage more on CWT. Only Thailand's FIU (AMLO) had thus far targeted a major wildlife trafficking business with the help of an NGO. Tax inspectors have never been engaged in CWT Asia, even though traffickers are using registered companies to launder wildlife and evade taxes. We anticipate that FIUs may not join right away or consistently. Therefore, we advise engaging APG and UNODC to invite FIUs and Tax inspectors to join multi-agency CWT teams and SIGs it is advised that national Tax Inspection agencies also be engaged.

Incentive to collaborate: Briefing on illicit WT supply chain operations in their country and how they violate AML statutes and Briefing on individuals and companies involved in illicit WT supply chains in their country.

- Special Police Agencies:** Wildlife crimes may involve other crimes – narcotics, arms smuggling, human trafficking and smuggling, and cyber laws are the ones that can typically be violated during the commission of a wildlife crime. In addition, the current scenario where Asian syndicates are targeting African wildlife should be of particular concern to Asian law enforcement since once the syndicates gain strength through their African businesses they would take advantage of any opportunity to further damage Asia's wildlife instead of focusing on longer supply chain operations.

Incentive to collaborate: Opportunity to de-fang Asian syndicates using a multiplicity of investigations against them, before the syndicates become financially powerful through their African operations.

- Attorney Generals:** Thailand, Malaysia, and the Philippines have engaged their AGs at times, but not consistently. This must change so that AGs are regularly engaged in CWT efforts.

Incentive to collaborate: Briefing on how

wildlife trafficking supply chains include people and companies that may be under separate investigations, allowing prosecutors to increase charges.

- **Anti-corruption Agencies:** largely untapped across ASEAN in CWT. Generally, anti-corruption agencies can be approached by a variety of people or organizations, so long as compelling information is presented about an officer, politician, or agency that is allegedly involved in serious corrupt practices. Approach Anti-Corruption agencies of Thailand, Vietnam, Malaysia, Philippines, Indonesia, Laos and Cambodia to examine information and trends in wildlife trafficking through their countries.

Incentive to collaborate: Briefing on illicit WT supply chain operations in their country and corrupt involvement.

Enhanced networking:

- **Engagement with Chinese Law Enforcement:** China, particularly through its Ministry of Customs, has expressed strong interest to engage the global community, particularly Southeast Asia and Africa on CWT. Given its strong role as a consumer country, engagement must be ramped up.

Recommendation: Build more networking and joint training opportunities between China and ASEAN law enforcement.

- **Linking counter-wildlife, counter-drug, counter-human trafficking enforcement:** The future of the ASEAN-WEN is unclear. On March 2019, it recently received new political support from regional ministers, and still has a mandate to convene multiple enforcement agencies to CWT. Meanwhile, other police-led enforcement networks in Southeast Asia are available to be tapped into, such as the ASEAN Association of Police (ASEANAPOL), and the regional chapter of the global International Drug Enforcement Conference (IDEC), which was initiated decades ago by the US Drug Enforcement Administration (DEA).

Since many major wildlife traffickers in Southeast Asia are linked to drug trafficking and other forms of transnational organized crime, there is good reason for ASEANAPOL and IDEC to collaborate with national WENs.

The IDEC still operates after 30 years since it was established, and 120 member countries have joined. Participants now typically bring intelligence and arrest warrants to IDEC

events, which are hosted in a rotational format, **with governments self-funding their trips.** There is no secretariat or regional costs that a donor needs to fund.

Recommendation: It may be worth modeling a similar convening forum for CWT that respects existing agencies and networks and operates without a bureaucratic structure. Officers would convene out of sincere interest, incentivized by the promise of information that will help them track and arrest criminals and seize their assets. (ACET will produce a separate report that explores the formation of a multi-disciplinary enforcement agency convening platform for sharing information).

2. Train and Operationalize Multi-Agency Teams

Vulnerability targeting
<p>GOAL: Identification of key, irreplaceable nodes in supply chains and grounds and means to arrest and prosecute them and seize assets</p> <p>STAKEHOLDERS: Police, FIUs, Attorney General offices</p>
Evidence based (and not testimony based) prosecutions
<p>GOALS: Establishing multi-agency cooperation as the standard and set default that all evidence relating to poaching and seizures are critical and mark the beginning of investigation, not the end (press conferences for arrests)</p> <p>STAKEHOLDERS: Police, Ranger Special Units, Customs, Prosecutors, Military</p>
Multiple Prosecutions
<p>GOALS: Establish as standard procedure for agencies to use non-wildlife laws for other crimes committed during a wildlife offence</p> <p>STAKEHOLDERS: Police, Prosecutors, specialized non-wildlife enforcement units</p>
Mentoring/Support/Monitoring (OJT)
<p>GOAL: Identification of enforcement chain that can do the above</p> <p>STAKEHOLDERS: UWA, Freeland, WJC, INTERPOL</p>
Combine Networking and Training
<p>GOALS: Provide agencies the benefits of combining networkign with specialized training</p> <p>STAKEHOLDERS: LATF, National WENs, China Customs</p>

Training and subsequent law enforcement operations in the region must become more specialized, focusing on gathering excellent forensic evidence (physical and digital), following the money, and working on live cases.

Key required additions to current training syllabi and operations:

- **Identification of Vulnerable Points in Illicit Supply Chains:** Traffickers have found increased enforcement annoying, disruptive and expensive to deal with. Nonetheless, the most aggressive and powerful trafficking businesses have found varying methods of penetrating the defense. To stop them, enforcers need to ask: where are traffickers vulnerable?

The vulnerabilities (aka “financial pulls”) behind illicit supply chains are legally registered companies, owned by traffickers, and protected by corrupt officers. Enforcement to date has targeted illicit cargo, and at best, the private individuals smuggling it. Therefore, we see impressive seizures and sometimes arrests of low to mid-level logistics specialists of the supply chain.

Recommendation: For greatest impact, enforcement units must intensely target the actual companies, company owners, and corrupt officers behind the exports and imports.

- **Evidence Based Prosecutions:** A successful case is one that leads to a prosecution and conviction. Training must focus on the correct method to collect forensic evidence – **both physical and digital** (from electronic devices recovered from suspects). Agencies must be trained, and mandated to consider that all evidence from a poaching or trafficking scene is the beginning of an investigation, and not treat such evidence as props for a press conference before closing the case.

This is important since important cases have fallen apart in court because the prosecution case was poorly constructed or the judiciary did not see wildlife crime as a priority. Physical or digital ‘footprints’ can help convince a judge better than a witness’ testimony. All major wildlife trafficking supply chains are currently operate under legal cover and leave clear digital footprints of their activities on open data sources, such as public company profiles or public shareholder reports. These rich data sources should be mined for evidence.

For example: the famous Boonchai Bach case in Thailand fell apart because:

- » the case was handled by a junior prosecutor with no prior experience with major wildlife crimes, and no team support.
- » the prosecution relied exclusively on the testimony of one witness, who changed his testimony. The judge had no choice but to hand down a verdict of not guilty.

Recommendation: Showcase and replicate DETECT & PROTECT that train officers on creating an effective, evidence based, case – particularly relying on digital evidence for international trafficking cases.

- **Multi Prosecutorial Approach:** Furthermore, enforcement must avoid exclusively using wildlife law to the exclusion of other legal statutes that can be more impactful, such as:

- » Money Laundering: registered companies which are used to smuggle wildlife are mis-declaring their cargo and laundering illicit profit.
- » Tax Evasion: these same companies are mis-declaring their income and true source of income.
- » Fraud and Forgery: many wildlife products are mis-labeled.
- » Corruption: local (and sometimes foreign) corruption prevention acts are being violated every time an illegal shipment is given assistance. The frontline officer who provides direct assistance or looks the other way, is being instructed to do so, and sharing payment with supervisors.

Recommendation: Encourage, train and mandate the primary investigation agency to bring in other law enforcement agencies to prosecute various aspects of the crime. This will happen organically if the agencies are already part of a national WEN, or networking body.

- **Mentoring or On-the-Job Training:** Despite training, officers unused to long-term, multi-phased investigations may revert to former practices when they return to their jobs.

Recommendation: Fund trained, senior (even retired) law enforcement to be stationed at the field offices of frontline investigations officers for periods of time, providing advice as the teams work their way through a live case.

- **Combine Networking and Training:** A separate ACET study on capacity building

to address the convergence of trafficking and corruption reveals that enforcement agencies benefit the most from combining networking with specialized training. A course called CTOC (counter-transnational organized crime) combines training, technology, networking, and intelligence. CTOC has 2 parts: a) Part I: the specialized training course that brings agencies and even countries together; and b) Part II: consists of mentoring officers with financial crime information and new technologies.

CTOC has already been used to convene and train multi-agency enforcement teams from Africa and Asia and led to more than 24 major arrests in 5 countries.

Recommendation: Convene more CTOCs, bringing together China, ASEAN and key African countries, to focus on ‘Follow the Money’ training.

3. Make CWT Rewarding

Currently, law enforcement faces more setbacks, bureaucracy, risks and tedium as compared to traffickers who are instantly rewarded. This situation needs to be reversed, else there will enforcement will forever play catch up with traffickers. The following incentives are recommended:

- **Reward High Performing Agencies and Informers:** For CWT efforts to succeed, they need to be rewarding. Syndicate heads, supply chain supervisors, and corrupt officers facilitating wildlife trafficking are sometimes widely known, or at least known to someone.

Recommendation: A rewards program for informers on wildlife criminals will lead to more arrests. Specific rewards (media spot-lighting, restitution funds) are discussed in the next section.

- **Officer Promotions on a New Enforcement Value Scale:** Officers deserve, and perform better from receiving, rewards. Successful enforcement actions against wildlife criminals should result in public acclamation and promotions. But enforcement agencies need to assign reward/promotion levels according to the impact of the enforcement success. For example, the arrest of a supply chain supervisor should count for more “points” than seizing elephant tusks or arresting a smuggling mule, while at the same time, the successful exploitation of a smuggling mule’s phone to identify a Kingpin

deserves high merit.

Recommendation: Use technology to make it easy for supervisors to assign value points to tasks and give rewards (discussed further in the Asset Forfeitures and Technology sections below).

4. Use Asset Forfeitures and Seizures

Billions of dollars are being made each year by wildlife traffickers. The best way to strike crippling blows to syndicates is to seize their profits. People are replaceable, but funds are not – at least not for a significant length of crime if the forfeiture is large enough. While it can take law enforcement time to find that money (whether it is in the form of liquid cash, or real estate, or more), the recommendations made above (training, networking, bringing in non-traditional agencies) are all aimed at ensuring that criminals lose the profits of their crime. That is the surest way to disincentivize them.

- **Use Seized Assets for Restitution Funds:** Once seized, these assets should be converted and shared in part with the enforcement team that found them, as well as with organizations that can repair relevant damage and prevent further harm to the said wildlife populations (See ACET’s upcoming report on “Financing Counter-Wildlife Trafficking” for more details).

Recommendation: Work with governments to change their laws to create restitution funds out of seized assets. Networking between lawmakers from ASEAN and countries which already have restitution funding mechanisms (USA, Australia) can help speed up the process.

5. Foster Support for Law Enforcement from Civil Society

Civil society stakeholders (the media, NGOs and even members of the public) can play key roles in supporting or watchdogging law enforcement, spurring better performance. Done respectfully and candidly, with a clear mutual goal of curbing wildlife trafficking, government-citizen partnerships can be extremely effective. In particular:

- **Media Support and Watchdogging:** Engagement with the media (print and electronic) will ensure that the CWT issue is hot, front and center. It has a multiplier effect of protecting honest officers from punitive action by corrupt seniors, by highlighting action against well-connected criminals. Media watchdogs can also constructively critique

unprofessional enforcement. Simultaneously, media coverage of wildlife issues can sometimes be inadequate or inappropriate – for e.g., revealing the locations of endangered wildlife populations, which makes them targets for poachers.

Recommendation: Train journalists to report correctly on wildlife crime, as well as set up informal workshops between law enforcement and the media to get updated information on newsworthy wildlife cases.

- **NGOs as Resource and Information Sources:** The best information on the most destructive wildlife trafficking supply chains operating through Asia resides with NGOs, such as Freeland, ENV-Vietnam, Wildlife Alliance, WCS, TRAFFIC, together with several enforcement agencies, and Interpol. NGOs may receive tip offs from members of the public, but also look for open source information on adjudicated cases, company registrations, news and industry information, etc. Enforcement agencies typically ignore these data rich open sources. It is vital to build the skills and interest of government agencies to harness the incredible potential of Open Source Intelligence (OSINT), and to rapidly facilitate the flow of NGO captured OSINT and analysis to enforcement.

Recommendation: Position Interpol to host CWT stakeholders (NGOs and government) to facilitate a mapping exercise that builds a rich picture of the supply chains; and institutionalize and scale use of DETECT-CTOC to focus target law enforcement audience on analysis and disruption of major illicit supply chains.

6. Use Technology

We are experiencing a technological revolution that can vastly accelerate CWT performance and impact, if tapped correctly. Especially:

- **Digital Intelligence:** Artificial Intelligence (AI) and Machine Learning (ML) tools can be applied to wildlife trafficking investigations and produce exponentially better results. Software and data extraction devices for phones and computers now quickly mine and associate criminal linkages that can lead officers to arrests and seizures. This technology may appear costly to but when used effectively, the results pay for the cost of technology many times over.

Recommendation: Introduce law enforcement to available tools by incorporating demon-

strations into training courses.

- **Rewards and Incentives:** Task tracking apps abound, but some are now being developed that allows users to set tasks for others, and digitally reward them with tokens (to be exchanged for goods from corporate partners such as restaurants and airlines) upon completion. Such apps could be used to reward high performing law enforcement officers by their superiors, as well as to reward members of the public who provide information.

Recommendation: Introduce law enforcement to available tools by incorporating demonstrations into training courses. Invest in R&D to ensure confidentiality of information providers.

7. Reduce Demand

Finally, no amount of CWT enforcement effort is going to sustainably put good governance out in front of wildlife trafficking unless the demand for endangered wildlife products is addressed. Several of the world's top wildlife importing countries, such as China and the USA, have taken steps to strengthen laws against purchases of endangered species, with China going as far as banning all domestic and cross-border sales of elephant ivory. Singapore announced a similar ban on World Elephant Day (August 12) in 2019.

- **Governments to Play Leading Role:** Behavior change must be government led. As this report demonstrates, traffickers are banking on extinction as well as future markets. Permanent bans on the sale of endangered species will send a signal to traffickers that future markets will be limited, black and risky. While some traffickers may elect to take that chance, others will opt out because of the real risk of enforcement, as well as reduced consumer base and prices.

Recommendation: Encourage and lobby governments for permanent bans on products and parts of endangered species, whether domestic or imported. Networking between lawmakers of countries which still allow sales, and those that have banned sales (India, Singapore, China) can catalyze efforts.

Conclusion



Ivory Seizure by customs (Photo by Freeland)

This report represents over 60 years of pooled experience of Freeland staff working to support government CWT efforts. The report aims provide historical context to crime and counter-trafficking efforts in Southeast Asia. It may be considered a snapshot of wildlife crime and enforcement in the region today, or as a guide to planning better enforcement activities.

Wildlife crime has grown to become one of the largest international organized crimes, largely because it has been previously ignored or downplayed. However, with emerging links to national and global security, the importance of ecological security is now being increasingly recognized. Equally important are the intangible, but rising sentiments of national or regional pride in a shared wildlife heritage, and the determination

to not let the greed of a few overshadow the needs of the many.

There is reason to be optimistic: inclination, determination and perseverance are all that are needed. New tools, laws, and changes in attitudes give the authors hope for the future and inspire them to continue working on this important issue.

Acknowledgements

This report is authored by Steve R. Galster CEO, ACET and co-authored by Ricardo R. Forrester, ACET Manager, and Onkuri Majumdar, Deputy Director of Programs. This report would not have been possible without the technical contributions of several individuals including: Sean O' Regan, Arunima Shrestha, Gloria Lopez Hernandez, and Andrea Cosma, all of whom have provided invaluable research and support in the development of the report.

This report was made possible through the funding provided by PMI IMPACT, a grant award of Phillip Morris International (PMI).

References

1. The Bach brothers are a case in point as described in The Guardian 3-part feature series on wildlife trafficking, September 26-28, 2016.
2. The author and his team have investigated wildlife trafficking in the target and outlying countries since 1993. They have also designed and launched counter-poaching and counter-trafficking activities in those same countries, which added to their knowledge base.
3. These investigations were carried out largely by the Environmental Investigation Agency (EIA), which the author participated in over 32 months between Africa and Asia in 1991-1993.
4. Author's personal observations during 1993/1994 investigation in which he and a fellow investigator met Chinese buyers at the White Swan hotel in Guangzhou where they described their purchases from N. Korean diplomats, including individual shipments of 200 kgs of rhino horns smuggled by diplomatic pouch from Africa into China. The sales coincided with press reports of N. Korean diplomats being caught buying rhino horn in Southern African countries, including Zimbabwe, Zambia, and South Africa.
5. 1994 investigation led by author for EIA. Also: Rademeyer, Julian, report "Tipping Point" for Global Initiative. July 2016.
6. Investigation led by author for Tiger Trust in Russia and Northeast China between November 1993 and March 1994.
7. Author was invited to meet with the owners and was shown their then new facility in Hainan. The owners explained to the author that they did not want to rely only on imports from Southeast Asia anymore.
8. Multiple Interviews by author with convicted wildlife trafficker Leuthai Teucharoen in 2016.
9. Results shared with author from Laos CITES survey of Laos tiger farms, 2017.
10. Results shared with author from Laos CITES survey of Laos tiger farms, 2017.
11. Confidential interviews with former tiger trafficker in 2017 and 2018; and Results shared with author from Laos CITES survey of Laos tiger farms.
12. Results shared with author from Laos tiger farm survey team, 2017.
13. Author's Personal observation during trade survey along Mekong River in July 2008.
14. Separate and multiple interviews by author with a wildlife smuggler in Southeast Asia, and also with Thai police detectives, each of whom reported this same dynamic. (The interviews with both smuggler and police on this topic first took place in 2005 and then later in 2016, when the then retired smuggler reported this dynamic recurring between 2011- 2016 due to increased enforcement).
15. Interviews by author with one of the smugglers involved in these shipments, 2005.
16. Interviews by author with 4 arrested members of 2 competing supply chains, 2014, 2016, and 2018.
17. Press release by US Attorney Office, Southern District of New York, June 13, 2019.
18. The Ministry of Foreign Affairs in some countries will also be necessary to involve due to prevalence of corrupt diplomatic missions that may exploit immunity to smuggle.



Analytical Center of Excellence on Trafficking (“ACET”)

Using Data to Combat Trafficking and Power Recovery

Every corner of our globe serves as a source, transit or destination for transnational criminal networks trafficking in people, wildlife, arms and other illegal “commodities”.

Trafficking impedes development of good governance, good business, and cross border cooperation. Hundreds of billions of dollars are derived each year from trafficking, thus empowering organized crime and corruption, undermining legitimate businesses, and threatening human rights and the environment.

To mitigate trafficking, governments, corporations and civil society require reliable insights to guide effective enforcement, policies, prevention, and recovery strategies.

Powered by IBM and Cellebrite digital intelligence technology, as well as frontline civil society networks, the Analytical Center of Excellence on Trafficking (aka ACET, pronounced “asset”) is an open source data fusion center that helps stakeholders make sound and timely decisions that reduce trafficking, thereby saving time, money and lives.

Using evidence analyzed by artificial intelligence technology and subject matter experts, ACET bridges data holders with lawmaker and enforcers, and spotlights trafficking problems and solutions for:

- Border authorities: to identify real time trends in illicit commodity trafficking;
- Investigators: to track and seize assets derived from trafficking;
- Lawmakers: to strengthen and streamline laws and policies to mitigate trafficking;
- Behavior change specialists: to identify social and economic drivers of trafficking;
- Corporations: to ensure compliance with laws and socially minded business.

ACET is supported by an alliance of civil society and corporate partners, including Freeland, IBM, Cellebrite, and Mekong Club.

This report was funded by PMI-Impact, a global grant initiative by Philip Morris International to support projects dedicated to fighting illegal trade and related crimes.

