



EXECUTIVE SUMMARY

Southeast Asia, perhaps more than any other region, encapsulates the full range of global challenges facing the management of biodiversity and trade in wildlife. Political and socio-economic disparities are large. Rapid development of infrastructure—often backed by foreign investments—and land conversion continues to challenge the region’s biodiversity hotspots. Levels of poaching, trafficking and consumption of wildlife products in Southeast Asia are persistent, if not increasing. The region’s endemic species and local populations of more widely distributed taxa remain under severe threat from hunting and illegal trade. This is particularly acute for many of the region’s terrestrial fauna.

The 10 countries of the Association of Southeast Asian Nations (ASEAN) function as source, consumer and as entrepôts for wildlife coming from within the region as well as the rest of the world—for trade that is both legal and illegal, with many inadequacies and loopholes concerning regulation, law enforcement and overall levels of sustainability. This globally connected trade feeds a demand for wild animals, parts and products for use as trophies and trinkets (or luxury goods), traditional medicine (TM) ingredients (including formal prescriptions and informal ‘health tonics’), and the multi-billion-dollar live animal trade.

These categories of trade and demand broadly involve:

- species that are protected and prohibited from national or international commercial trade;
- species that can be traded nationally or internationally, and for the latter, where national regulatory controls should frame implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) for any international commerce of CITES-listed species; or
- species that are not protected domestically but national and international trade occurs with little or no regulatory controls, often in large volumes and in violation of CITES provisions.

To contextualise this issue for the Southeast Asian region, TRAFFIC undertook an assessment to profile the illegal and unsustainable wildlife trade implicating the region, focusing on some of the

most traded taxonomic groups of terrestrial fauna. The overall analysis illustrates the main problems facing the region in two priority aspects: 1) where trade is prohibited and illegal, and 2) where legal trade is permitted but conducted in either an illegal and /or unsustainable manner (including where trade regulations are not robust enough, ambiguous or poorly regulated and enforced, which allows illegal trade to occur).

This assessment presents an overview of the trade dynamics and broadly contextualises common patterns, challenges and potential solutions to overcome these threats. Country profiles for the 10 ASEAN countries have been generated, summarising pressing local circumstances that enable illegal and unsustainable trade. The country profiles further propose a range of solutions to counter these challenges to reduce the prevalence of illegal trade coming to or through the Southeast Asian region.

The statistics for terrestrial fauna in trade are revealing; examples of historical trade data for reported legal trade gives some insight into the magnitude of transactions, including:

- between 180 million and 1 billion wild-caught Asian frogs were exported annually from Indonesia to Europe and USA over a decade from 1998–2007;
- about 10 million wild-caught tortoises and freshwater turtles were exported from Indonesia, Malaysia and Thailand alone collectively, in the late 1990s;
- over 10 million reptile skins from Southeast Asia exported and re-exported globally from 2005–2013.

In parallel, illegal trade statistics reinforce the position and significance of Southeast Asia's footprint on biodiversity use and management:

- about 225,000 kg of African Elephant *Loxodonta africana* ivory seized implicating Cambodia, Indonesia, Lao People's Democratic Republic (PDR), Malaysia, Myanmar, Philippines, Singapore, Thailand and Viet Nam for the period 2008–2019; 71% of these were seized by Viet Nam, while another 14% by Singapore;
- some 895,000 pangolins estimated to have been trafficked from 2000-2019, while over 96,000 kg of pangolin scales mostly African were seized from 2017–2019 across Malaysia, Singapore and Viet Nam, representing about 94% of the total amount of scales confiscated in Southeast Asia during this period;
- more than 100,000 Pig-nosed Turtles *Carettochelys insculpta* seized in just Indonesia from 2003–2019. In Southeast Asia, the species only occurs in the Papua Province of Indonesia;
- over 45,000 songbirds seized in just Sumatra and Java from 2018–2019;
- more than 6,000 Indian Star Tortoises *Geochelone elegans* – from south Asia – seized in just 10 incidents in 2017 alone, with all of them heading to either Malaysia, Thailand or Singapore;
- more than 3,800 bear equivalents seized in Asia, implicating almost all ASEAN countries, from 2000–2016;
- at least 4,500 African rhino horns entered illegal trade globally from 2016–2017, but only 1,093 seized by enforcement agencies; many of which implicated almost all ASEAN members as a destination or transit country;
- more than 3,000 Helmeted Hornbill *Rhinoplax vigil* parts and products seized in Asia from 2010–2019, with more than 1,100 seized just in Indonesia; online platforms and markets continuing to offer hundreds of helmeted hornbill products illegally including Lao PDR, Myanmar and Thailand;
- more than 2,200 equivalent Tigers seized in just the 13 Tiger range states from 2000–2018;
- at least 1,189 otters observed for sale online in four ASEAN countries over a four month period in 2018, with at least 356 individuals seized in eight ASEAN countries from 2002–2019, largely in Indonesia and Viet Nam

Given the clandestine nature of such trade, these data represent a small fraction of the true scale of the overall magnitude of illegal wildlife trade, particularly when considering two factors. First, seizures represent only a segment of trafficking incidents that were successfully intercepted and reported, meaning a higher degree of trafficking goes undetected and/or unreported. Second, the complex and often ambiguous systems that are meant to regulate industrial-scale commercial trade, such as captive breeding operations, are in fact riddled with loopholes, which leads to a mix of misdeclaration, misreporting and/or laundering of wild-caught animals declared as captive bred. Additionally, seizures and illegal trade do not often result in successful convictions or tough penalties that would act as a deterrent in what remains a low-risk, high profit world of wildlife crime.

Despite years of evidence stacked against the open markets and outlets that unlawfully sell wildlife products across the region, these outlets continue to operate blatantly with impunity in several locations across Southeast Asia, under various degrees of regulation and law enforcement. Some of these markets increasingly cater for specific clientele—for example, in Lao PDR and Myanmar, some outlets are operated by Chinese nationals with transactions conducted in Chinese Yuan and catering predominantly to Chinese buyers. Elsewhere, domestic trade of wildlife occurs on a large scale, such as wildlife-based medicinal items sold in violation of laws or without adequate regulatory systems in place, or native species hunted to supply demand for the pet or wild meat trades. Illicit online marketplaces, including through social media, have mushroomed over the past decade and cater to both opportunistic and highly organised buyers and sellers. Anything considered a luxury product such as ivory and rhino horns to live animals such as Tigers *Panthera tigris*, Sun Bears *Helarctos malayanus* and Ploughshare Tortoises *Astrochelys yniphora* can be ordered, bought and shipped with the click of a button without either the buyer or seller leaving their homes or place of business.

There is no shortage of collaborative tools and platforms to be employed to deal with this problem, yet the overall progress made to stem illegal wildlife trade is slow, and often lacks co-ordination. Pervasive corruption and a lack of political will fundamentally undermines whatever systems are in place, allowing illegal and unsustainable wildlife trade to persist and often flourish. The high profit, low risk combination makes wildlife trade a lucrative business and attracts organised criminality. While all Southeast Asian countries have enacted legislation to implement CITES, many of the laws are inadequate and outdated to combat this problem effectively. This, despite all of the ASEAN countries being Parties to CITES—most for over four decades—there remains a long way to go in the efforts to stem illegal trade and ensure compliance with the Convention.

Aside from the obvious illegal trade which contravenes existing regulations, a lack of robust science behind the setting of any harvest and trade quotas for legal wildlife commerce inhibits the potential of any efforts to achieve sustainability. The laundering of wild animals through captive-breeding operations is one such example which affects declines of wild populations. Organised illegal trading networks are adept at taking advantage of the region's well-organised transportation and logistical systems; armed with the knowledge of legislative shortcomings, poorly implemented and/or enforced regulatory systems and corruption, the weak points in the trade chain are targeted by traffickers. What must be addressed are enabling factors and drivers of illegal wildlife trade and the demand that fuels it. There is a multiplicity of actors across the supply chain from source to end-user—ranging from tacit to complicit levels of risk exposure—from both public and private sector interests. Action, for example, by increasing knowledge, compliance and vigilance by businesses in the transportation and logistics sectors has a crucial role to play in deterring and preventing movement of illicit shipments of wildlife. Additionally, work with financial institutions and anti-money laundering agencies that target “follow the money” approaches has the ability to constrict opportunities to intercept and seize criminal proceeds within ASEAN and globally.

A multi-pronged approach is needed to tackle the various complexities involved in combating illegal wildlife trade. At a structural level, this involves ensuring comprehensive legislative frameworks at the national level, ideally with similar coverage of issues and penalties across the ASEAN to ensure there are no “soft spots” where wildlife crime can thrive. Given the consistent and high level of

organised criminality, intelligence-led law enforcement is paramount to increase deterrents to illicit activity along the entire trade chain from source to market. In terms of targeting end-use demand, efforts to change behavioural norms of consumers needs to be pursued in parallel with effective regulation and law enforcement. At the national level, collaborative engagement between agencies is the building block of regional co-operation across jurisdictions. Partnerships that link government agencies, civil society organisations, the private sector and research institutions have the potential to bring both innovation as well as collective action, but ultimately depend on political will and adequate resourcing (human, financial, and technical).

Trade patterns continue to change and adapt, which emphasises the importance of continued research and monitoring to map the dynamics of illegal wildlife trade. Ultimately the challenge is putting together the right mix of interventions to be pursued in an organised strategy, at sufficient scale and duration, in order for Southeast Asia to achieve substantial change.

Recommendations

A selection of priority interventions to support strategic decision-making and actions by ASEAN governments and other partners have been drawn from the breadth of existing literature reviewed for this assessment. These interventions are grouped under five main thematic areas as follows:

- **Policy** – interventions focused on ensuring that national legal frameworks and regulations are fit for purpose and that it considers trends on illegal wildlife trade over time and is improved accordingly to prevent and deter wildlife traffickers;
- **Law enforcement** – interventions where frontline law enforcement authorities and the judiciary can optimise their impact for the disruption of wildlife trafficking;
- **Demand reduction** – interventions aiming to influence the purchasing preferences, buyer behaviour and use, by current and intending consumer groups;
- **Cross-sector co-operation** – interventions where external parties such as the private sector and professional bodies (anti-money laundering, financial investigation), civil society organisations, conservation practitioners and research institutions can assist and facilitate effective actions;
- **Research gaps** – interventions to address knowledge gaps to improve anti-wildlife trafficking decisions and policy.



	Area of intervention	Required interventions
Policy	Close loopholes and harmonise national legislation	<ul style="list-style-type: none"> • Update legislation in Brunei Darussalam, Cambodia, Indonesia, Lao PDR, Malaysia (Sabah and Sarawak), Myanmar, Philippines, Thailand, and Viet Nam to include all CITES-listed species in national protection lists; • Increase penalties to a harmonised level of deterrent across the different national laws in which wildlife offences are dealt with across ASEAN, including provisions empowering enforcement officers to pursue necessary investigations; • Criminalise online advertisements and offers for sale of protected wildlife species or products, through specific provisions in the law; • Where a particular rare or threatened or endemic species with a restricted range is heavily impacted by international trade, consider the inclusion of that species in CITES Appendix III; • Ensure appropriate resources and budget allocation to support law enforcement actions, along with facilities for rescued wildlife and repatriation, which also helps ensure these specimens do not leak back into the illegal trade chain.
Law Enforcement	From seizures to successful convictions	<ul style="list-style-type: none"> • Identify and shut down open markets¹ selling protected wildlife and their products; • Prevent the establishment of any further captive tiger and bear facilities (including farms), and ensure that current stock is not augmented to allow sale/leakage into illegal trade; current facilities found to be conducting business illegally should be shut down. • More robust regulations and controls to assess the management of other farms and breeding facilities for commercial trade, such as those for reptiles and birds; • Severely constrict illegal online availability of wildlife on commercial trade platforms and trade via social media, working with online businesses—including through the <i>Coalition to End Wildlife Trafficking Online</i>, and transport/logistics companies; • Utilise existing national anti-money laundering and anti-corruption frameworks to process wildlife trafficking cases as predicate offences by initiating financial investigations, application of harsher penalties and recovery of proceeds. This includes preventing, identifying and addressing corruption-related cases; • Conduct proactive intelligence-led and in-depth investigations, including the use of social network analysis, controlled deliveries, and financial investigations along the trade chains; • Improve detection of illegal shipments with systematic and regular monitoring, and enhanced equipment (e.g. use of sniffer dogs and scanner machines) and techniques (e.g. risk profiling) to identify geographical or logistical nodes as monitoring targets;

¹ Here, open markets are taken to refer to establishments that sell wildlife parts and products that are prohibited from trade, either by national legislation or non-native species listed in CITES Appendix I and prohibited from commercial trade such as rhino horns, tigers, pangolins, reptiles, birds and others. These open markets are slightly different from local-level stalls or markets selling wild meat, predominantly for local consumption where in many cases legislation permits trade, but falls short in its licensing and permitting enforcement.

		<ul style="list-style-type: none"> • Enhance reporting and communications mechanisms by customs and other relevant agencies in countries of import, transit and • (re-) export regarding suspicious practices both at national level as well as at port of entry and exit, including illegal trade reporting as mandated by CITES; • Establish a standardised system to track law enforcement incidences, such as the Law Enforcement Management Information System (LEMIS) database utilised in the USA or the EU-TWIX (Trade in Wildlife Information Exchange) programme in Europe, for the purposes of enhancing law enforcement efforts; • Work with civil society organisations to harness public participation initiatives to support law enforcement actions, such as through hotlines or reporting apps; • Promote inter-agency co-operation on intelligence and data sharing across national law enforcement agencies and between countries; • Support where available the use and advancement of wildlife DNA forensic techniques to identify provenance, and authenticity of wildlife parts and products traded to strengthen enforcement actions and prosecutions; where this is done, results must be shared with all the relevant countries to strengthen national-level efforts; • Capacity building and training with enforcement and judiciary bodies, including joint training sessions, bringing together prosecutors and judges.
	Monitoring and reporting	<ul style="list-style-type: none"> • Continue monitoring at known and emerging physical and online markets to catalyse evidence-based action by law enforcement interventions, identification of emerging threats and keeping watch on trends over time, including shifts in consumer market availability as a response to stricter law enforcement; • Improve regulations, transparency and accountability of the many captive breeding facilities in the region to ensure that laundering of wild-caught species does not occur and that trade is not detrimental to wild populations; stricter scrutiny and periodic science-based assessments by CITES on country operations for trade in CITES-listed species is imperative; • Establish a transparent reporting and monitoring system on captive breeding operations, including making information publicly accessible by species, quotas and trading partners;



<p>Demand Reduction</p>	<p>Use of a twin-track approach</p>	<ul style="list-style-type: none"> • Ensure that efforts to constrict supply and remove illegal-sourced wildlife products from the market are complemented by campaigns targeting priority high-risk groups of consumers with messaging that addresses their underlying motivations to consume illegal wildlife commodities, achieves changes in their behaviour, thereby reducing demand; • Develop strategic Social and Behavioural Change Communications (SBCC) approaches to influence the behaviour of key target audience segments effectively related to their purchase and use of illegal wildlife commodities. The SBCC approaches should be informed by evidence and insight into consumers' attitudes, values and motivations; • Align government-led actions to change behaviour with implementation of CITES Resolution (Res.Conf 17.4) on Demand Reduction, and relay success factors and lessons learned back to www.changewildlifeconsumers.org in line with Guidance; • Work with priority industry sectors including e-commerce and social media, travel and tourism, and transport and logistics, medical practitioners and the traditional medicine community to influence supply chains, market availability and consumer preference; • Foster increased leadership on these issues amongst champions for each target audience and enable them to influence the intentions of their peers and followers.
<p>Cross-Sector Co-operation</p>		<p>Continue engagement with the private sector (e.g. tourism, transport and logistics, e-commerce, banks) to be the eyes and the ears of enforcement agencies by:</p> <ul style="list-style-type: none"> • Facilitating the tracking of bank accounts and transactions of businesses and individuals linked to wildlife crime to enable deeper investigations into trade chains and potential money laundering operations; shutting down operations/accounts where there is clear evidence of illegality; • Establishing and/or improving corporate policies and standard operating procedures around zero tolerance for wildlife trafficking; • Promote do's and don'ts and red flags to business partners to prevent and/or detect illegal activities. <p>Continue engagement with NGOs, civil society, academia to:</p> <ul style="list-style-type: none"> • Continue monitoring of physical and online markets (linked to law enforcement above); • Assist with species or wildlife product identification and information, and intelligence sharing, including support with investigations as required. <p>Expand inter-governmental collaboration particularly at national levels:</p> <ul style="list-style-type: none"> • Establish joint engagement platforms involving a range of sectors, such as those responsible for national security, customs and immigration, multimedia and communication and others, to develop mitigation measures along all points of the illegal trade, such as the LEMIS or TWIX approaches in the US, Europe and Africa.

<p>Research Gaps</p>	<p>Undertake periodical research tasks—including through collaboration with NGOs, research institutions and other relevant partners—to establish contemporary knowledge and understanding of trade threats and dynamics that require interventions, such as:</p> <ul style="list-style-type: none"> • Review and update ASEAN countries’ rate of prosecutions and convictions against arrests and seizures, including judicial capacity, to identify and address needs to ensure stiffer sentencing and penalties are meted out; • Analyse information on market availability, CITES trade data as reported by governments and seizures to assist in the identification of emerging trends or common problems facilitating illegal wildlife trade to inform policy and regulatory needs; • Conduct consumer research to understand the motivations of consumers of specific species, and gain insight into the most effective ways to influence their choice and reduce their demand for illegal wildlife commodities using SBCC initiatives; • Ensure a comprehensive approach to impact measurement is undertaken—for example, by contextualising fluctuations in consumer expressed intent to purchase illegal wildlife products in the future, against market monitoring data of wholesale price, volume of offers for sale and throughput of product in the market. Also consider e.g. retailer perception surveys and other social science methods, share learning and insights with the Community of Practice working on demand reduction (www.changewildlifeconsumers.org).
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**specific target audiences for the above-mentioned interventions are provided in Table 8 of this report*

