IWT RED FLAGS

# ILLEGAL WILDLIFE TRADE TOOLKIT



A significant amount of work has gone into developing red flag indicators related to the illegal wildlife trade which can be routinely used by financial institutions, both to spot suspicious transactions and to screen for potential traffickers. The Financial Action Task Force has led the way by issuing its own guidance. The organisation TRAFFIC followed with its 'Case Digest: Financial Flows and Payment Mechanisms Behind Wildlife Crime', whereas civil society groups including the WWF, EIA and Wildlife Justice Commission provide typologies encountered during their investigations so that the financial sector can build appropriate mechanisms to spot similar behaviour.

Understanding these common methodologies was highlighted in our research as a key requirement for financial institutions if they are to tackle IWT at an organisational level. Interviewees from across the financial sector emphasised that additional guidance on common red flags would be of significant benefit as it can be very difficult to know where to look for signs of IWT.

By compiling data from a range of sources and interviews, our research has identified the most typical criminal behaviour patterns that have been linked to IWT-related suspicious transactions. These red flag indicators are specifically tailored to IWT for banks and other financial institutions and can be split into the following categories:

- 1. Geographical red flags
- 2. Transportation red flags
- 3. Client profile red flags (KYC / DD)
- 4. Transactional red flags
- 5. Trade-based money laundering red flags
- 6. Corruption red flags
- 7. E-Commerce red flags
- 8. Keyword searches

These terms highlight the many methods by which IWT is concealed within legitimate trade. Hence firms will need to assess how to incorporate these terms into their systems based on the nature of their own business, and by combining these terms with other red flag indicators to minimise the amount of false alerts. Please note that not all red flags apply to all organisations and each organisation should select those that apply to them.









# 1. Geographical Red Flags

This section captures specific geographical red flags associated with IWT. Much of the most commonly trafficked wildlife originates in just a small number of the countries in Africa, while a number of locations in Asia consistently appear as key destination hotspots.

- The majority of the most widely trafficked wildlife originates from a specific set of countries in Africa. Special attention should be given to transactions involving South Africa, Nigeria, Mozambique, Angola, DRC, Republic of Congo, Cameroon, Uganda, Kenya, Tanzania, Equatorial Guinea, Zambia, Zimbabwe, Benin and Ethiopia.
- Although new IWT transportation routes from Africa to Asia are being detected by authorities every year, a number of locations consistently appear as key transit hotspots. Special attention should be given to transactions involving Malaysia, Singapore, Hong Kong, Thailand, South Korea, Japan, Laos, Cambodia, Myanmar, Vietnam, UAE (particularly Dubai), Qatar (particularly Doha) and Turkey (particularly Istanbul).
- Some transit countries are also destination locations for IWT. The value of trafficked wildlife increases along the supply chain and often reaches its peak at the destination. Special attention should be given to transactions involving China, Vietnam and Hong Kong.
- Attention should be paid to wildlife-related transactions from African countries with sea access, and particularly from those that boast a productive fishing industry for transactions related to other illegal, unreported and unregulated fishing (IUU) sea products.













# 2. Transportation Red Flags

This section covers the common methods used in the transportation of illegal wildlife via air or sea. These include:

- Shipment of commodities inconsistent with the origin and/or destination country. For example, timber being shipped to a country that is already a major timber producer and exporter.
- Consignment split across multiple shipments. This is a tactic often used by traffickers to spread the risk and reduce the loss.
- Abnormal shipping routes for the product and destination or unusual change of shipping routes.<sup>2</sup>
- The use of free trade zones and free ports and their simplified import, export, transit procedures, which can be exploited for the diversion of illicit shipments.
- Airline passengers travelling frequently on high-risk IWT routes for a short period of time on tickets paid for by a third party or in cash. Passenger flights are often used to transport higher value wildlife products such as rhino horns.
- Significant differences between the wire transfers received and the noted freight on board (FOB) value exported.<sup>3</sup>
- Shipments whose overall weight is inconsistent with the underlying product (Vietnam's largest rhino horn seizure was based on an individual passing off the ivory as a container of fabric for instance).
- Customer screening provision of a corporate website, use of business emails and provide a valid copy of the business registration certificate or tax ID number. Companies that do not have an online presence or use non business email addresses, such as hotmail or gmail, for business correspondence should be checked.
- First-time shippers and new customers should be checked and their shipments screened.
- Any transaction where a shipper or a consignee insists on paying the transport cost in cash is always a risk and must be checked. In addition when a transport cost is paid by the third party, i.e., not a shipper or a receiver.











- Customers who wish to arrange their own drop-off/pick-up of a shipment to/from the terminal. Such a request might be considered quite illogical and abnormal.
- Change of the delivery address at any time after it was shipped should be investigated as it may indicate an intention to divert a shipment. While the change of the address can be considered a standard practice in commodities trading (e.g. steel bars, aluminium ingots etc), this is very rare in the shipment of retail products and will have to be explained.

WWF HK and TRAFFIC have also produced this helpful report 'The Red Flag Compendium for Wildlife and Timber Trafficking in Containerised Cargo'.

# 3. Client Profile Red Flags (KYC / DD)

Organised IWT is often facilitated by legitimate businesses serving as fronts. Particular attention should be paid to the following business profiles and characteristics when screening for IWT risks:

- Involvement of a client's legitimate business in import/export, freight forwarding, customs clearance, logistics or constructions, motor vehicle spares, and second-hand car dealership, deals with forestry resources, hunting, wild or domestic animals (see below), traditional medicine, carving, fur/skin for the fashion industry, furniture, or travel agencies and foreign currency exchange offices.
- Involvement of legal wildlife-related entities such as private zoos, breeders, (exotic) pet stores, safari companies, pharmaceutical companies making medicines containing wildlife, wildlife collectors or wildlife reserves.
- Businesses involved in commodities that are often used as concealment methods for IWT such as timber, frozen food, plastics and rubber, marble and stones, cashew nuts and other agricultural products such as flower seeds, ginger, coffee, tea leaves, beans etc. It is important to note that large quantities of these products are needed to hide the wildlife there within, sometimes even during low seasons for the agricultural products.
- Any reluctance to offer information about the business at hand, the end-use of a product or about the consignor/consignee, as this could potentially to be due to a shell company being set up to mask the actual ownership.
- Involvement of direct or beneficial owner(s) of a business domiciled in a jurisdiction that is a prominent transit or demand country for illegal wildlife.
- Clients associated with, owned or controlled by known IWT suspects or those subject to adverse media in relation to IWT.
- Other suspicious account activities not in line with client profile, such as when:
  - Large deposits are made into personal accounts of unemployed individuals;
  - Deposits are significantly above declared income;
  - The declared nature of business is not in line with specified account activity;
  - The client fails to provide reasons for large transactions;
  - Receipt of funds does not make economic sense for the account holder.











# 4. Transactional Red Flags

Across the trafficking chain, from the customers down to the poachers, IWT tends to involve a number of suspicious payment types which should be paid attention to when transactions are being screened. These include:

- Rapid fund movements such as multiple cash deposits and round amounts, internal transfers followed by multiple cash withdrawals, or multiple cash deposits into account followed by multiple cash withdrawals.
- Large deposits in cash or cheque form and ATM withdrawals, especially if not accompanied by an explanation of source of funds, as poaching networks or low-level suppliers in source countries in Africa operate largely as cash-courier businesses.
- Significant cash payments into accounts linked to individuals from high-risk IWT jurisdictions.
- Escrow-type transactions from/to accounts and companies with the same beneficial owner for cross-border shipments.
- Structuring of deposits just below suspicious transaction reporting thresholds.
- Transactions and other account activities that are inconsistent with a client's usual business, commercial purpose or profile. For instance, purchase of high-value goods inconsistent with a customer's wealth profile.
- Transaction references using specimen names or veiled speech.
- Illogical or anomalous loans between trading and import/export companies in high-risk zones, especially in source and transit countries for IWT.
- Transactions in key departure countries in Africa (such as Nigeria and DRC) and transit locations in Asia (such as Malaysia, Singapore, Vietnam and Hong Kong SAR) done through bank transfers among multi-country accounts and payment schemes.
- Destination countries and particularly China have a mature digital payment market, such as WeChat Pay, and Alipay, so transactions undertaken on these platforms must be factored into screening.
- Large withdrawals of cash in dollars from Chinese-owned money exchanges operating in high-risk IWT jurisdictions in Africa and Asia.
- Transactions using names of ingredients or products in the traditional medical trade that refer to CITES species.
- Use of third parties to create export companies and bank accounts, such as ATM cards registered under third parties.
- Transactions by licensed pet shop suppliers or breeders, especially if there are significant discrepancies between the ordered animal and the value of the goods in these transactions. Organisations should also check if the animal is CITES regulated and require the relevant CITES certificate before processing the transaction.
- Large US dollar wire transfers between wildlife farms and firms operating in inconsistent lines of business.
- Middleman transactions first initial payment as a deposit, followed by smaller multiple payments, for wildlife along every stop in the supply chain.
- Rental car transactions with two bookings close in time in neighbouring countries.













# 5. Trade-based Money Laundering Red Flags

Specific red flags associated with trade-based money laundering (TBML) can provide a good tracing mechanism to identify IWT. These TBML indicators tend to be more integrated into existing banking systems, so understanding which are relevant to IWT represents a good first step to monitor suspicious activity related to the illegal trade of wildlife across borders. TBML indicators that are of relevance to IWT include:

#### Documentation red flags

- False names or addresses for importers and exporters on invoices and shipping documents (bills of lading (BoL), certificates of origin and quality certificates); in particular, matching addresses of carrier and shipper.
- Discrepancy between the gross weight or size of a commodity as reported on shipping documents or invoices and the cargo/cargo container's actual weight or size.
- Discrepancy between the description, transaction reference or value of a commodity in shipping documents and invoices and the actual goods shipped or actual value in payments made.
- Dubious or vague descriptions of commodities on shipping documents and invoices.
- Questionable paperwork such as duplicate certificate numbers, missing permit details, falsified signatures, especially anomalous, incomplete or suspicious CITES certificates. (See Appendix I for CITES certificate template).

#### Suspicious behaviour or processes

- Commingling of personal and business proceeds, especially by individuals and firms previously reported by authorities or media to trade prohibited products and commingle illegal proceeds with legal business or conduct transactions which are not related to the business purpose of the account and without supporting documentation.
- Last minute requests for shipment clearance, which could indicate an attempt to avoid detection through imposing time constraints.











- Switched bills of lading by traders previously implicated in criminal activity involving wildlife trafficking or in trade fraud investigations/prosecutions.<sup>4</sup>
- Illogical or anomalous purchases, payments, or other transactions related to gold trading from business accounts of clients. Payments for wildlife shipping are often masked as payment for gold or to gold trading businesses.
- International bank transfers via general trading companies or remittance of funds by general trading companies to individuals and entities suspected of IWT.
- References made to e-commerce or social media platforms (Facebook, Ebay, Instagram, Zalo, WeChat, Taobao, T-mall etc) in trade transactions.
- Transport routes which are unusual based on commercial rationale, e.g. export of extremely low value commodities, particularly along high-risk IWT corridors.
- Export of CITES protected species, especially those listed on Appendix I and those to commercial businesses.

### Suspicious entities

- Transactions involving general trading companies set up as foreign entities and registered at residential addresses.
- Transactions involving beneficial ownership on the part of non-resident nationals of high-risk IWT jurisdictions, which could indicate potential front companies.
- Transactions involving suspects or subjects of IWT or other environmental crimes.

Overall, it is important to ask questions such as: is the traded species known to be from the origin country? Do the details of the transaction align with other information about the buyer? Does the shipped item possess enough retail value to justify the expense of shipping it in the first place?

# 6. Corruption Red Flags

Since corruption often facilitates the illegal wildlife trade, signs of corruption are also a good indication of IWT in certain high-risk jurisdictions. They can include:

- Dubious trade and shipment documentation, including invoices and shipment documents (see TBML red flags above), which could indicate the forging, modification or sale of key authorisations.
- Large cash or other deposits, wire transfers, multiple cash deposits and withdrawals, and/or unexplained wealth associated with government officials working in wildlife protection agencies, border control authorities, or customs and revenue officials, forestry agencies, wildlife management authorities, zoo and wildlife park employees, or CITES Management Authorities (CMAs) and their associates or relatives.











- Large cash or other deposits, multiple cash deposits and withdrawals, and/or unexplained wealth
  associated with government officials from environment or other ministries who have specific
  management or oversight authority of government stockpiles of seized ivory, rhino horn, timber or
  other illegal wildlife products, and their associates or relatives.
- Transactional activity involving PEPs and wealthy businesspeople, particularly those with environmental, game or forestry oversight, or environmental/wildlife related businesses, especially when the transfers are without supporting documentation or the PEP in a known source country receives payments from a company unrelated to the account activity.
- Payment of bribes to airline staff to facilitate movement of goods.
- Payment of bribes to disrupt law enforcement investigations, including to judges, police, guards manning highway checkpoints, border guards, and government officials.

In general, the movement of wildlife goods in the following 'hotspots' should come under greater scrutiny for possible corruption red flags:

- Movement of wildlife goods in free economic and trade zones;
- Movement of wildlife goods at key bottlenecks and checkpoints, where much IWT passes undetected due to official corruption at seaports and airports;
- Movement of wildlife goods at IWT transport 'hotspots', where 'leakages' from government stockpiles of seized IWT products can occur due to poor management.

# 7. E-Commerce Red Flags

The rapid growth of online payment platforms and the widespread use of social media has provided a new avenue for illegal wildlife traders to access retail buyers. This includes the trade in exotic pets as well as bushmeat and products derived from protected wildlife. These products are often marketed to tour groups where predominantly cash-based market sellers encourage passing trade to connect online where they can display their illicit goods. Particular red flags for E-commerce sites include the following:

- CITES-listed species being openly marketed for sale on online platforms.
- Marketing of pets or wildlife products on online platforms in 'closed' or 'secret' groups. Sellers typically mention the word "serious buyer" when looking to sell.
- Initial connection between parties on an online platform is requested to be "taken offline" or other contact details are shared eg initial Facebook communication migrating to What's App.
- Payment to tour operators, particularly those specialising in Laos, Vietnam, Cambodia and Thailand followed by online payments using platforms such as Alipay or WeChat Pay.
- Market traders, especially in tourist areas, accepting numerous payments from online payment platforms such as Alipay of WeChat Pay.

This report by TRAFFIC provides further background on this topic: <u>Trading Faces - A Rapid Assessment on the use of Facebook to Trade Wildlife in Peninsular Malaysia</u>.











# 8. Keyword Searches

As compliance monitoring systems operate using key words, it is important to flag those that are specific to IWT and its common transit and concealment methods. This section incorporates a list of keyword searches which can be directly utilised in financial institutions' existing systems.

It should be noted that these terms highlight the many methods by which IWT is concealed within legitimate trade. Hence firms will need to assess how to incorporate these terms into their systems based on the nature of their own business, and by combining these terms with other red flag indicators to minimise the amount of false alerts.

#### **Timber Keywords**

- Timber
- Plywood
- Pulp
- Flooring
- Wood
- Paper
- Hardwood
- Lumber
- Cherry
- Birch
- Maple
- Teak
- Roundwood
- Sawn timber
- Sapwood
- Oakwood
- Pine
- Dalbergia
- Mahogany
- Acacia
- Bloodwood
- Ebony
- Sandalwood
- Blackwood
- Redwood
- Mahogany

### Other Commodity Keywords

- Rubber
- · Recycling packing materials
- Rosewood
- Furniture
- Shell
- Horn
- Wildlife
- Frozen food
- Plastics
- Marble
- Stones
- Cashew nuts
- Flower seeds
- Cassia seeds
- Ginger
- Coffee
- Tea leaves
- Beans

#### **Business Sector Keywords**

- Import/export
- Freight forwarding
- · Customs clearance
- Logistics
- Construction
- Motor vehicle spares
- Second-hand car
- Forestry
- Hunting
- Wildlife
- Wild animal
- Zoo
- Safaris
- Pet
- Traditional medicine
- Carving
- Fur
- Skin

# **Species And Other Keywords**

- · Kano, Nigeria
- · Xianyou, Fujian, China
- · Putian, Fujian, China
- Golden Triangle (Myanmar, Laos, Thailand)
- Elephant
- Ivory
- Rhino
- Horn
- Tiger
- Pangolin
- All species listed on CITES Appendix I, II and III











#### Seaport Keywords

- · Port of Lome, Togo
- · Port Dar es Salam, Tanzania
- · Port of Manila, Philippines
- Matadi Port, DRC
- · Apapa Port, Lagos, Nigeria
- · Maputo Port, Mozambique
- Pemba Port, Mozambique
- Beira Port, Mozambique
- · Pointe-Noire Port, Congo
- · Shanghai Port, China
- · Shenzhen Port, China
- · Qingdao Port, China
- · Tianjin Port, China
- · Xiamen Port, China
- · Hangzhou Port, China
- Autonomous Port of Cotonou, Benin
- · Klang Port, Malaysia
- · Johor Port, Malaysia
- Port of Singapore (Tanjong Pagar, Keppel, Brani, Pasir Panjang, Sembawang and Jurong)
- Port of Hong Kong (Kwai Tsing, Tuen Mun)
- · Busan Port, South Korea
- Tokyo Port, Japan
- Nagoya Port, Japan
- Osaka Port, Japan
- Kobe Port, Japan
- Sihanoukville Autonomous Port, Cambodia
- · Hai Phong Port, Vietnam
- Tien Sa Port, Da Nang, Vietnam
- Ho Chi Minh Port, Vietnam
- · Quang Ninh Port, Vietnam

### Airport Keywords

- O.R. Tambo International Airport, Johannesburg, South Africa
- Maputo Airport, Mozambique
- Pemba Airport, Mozambique
- · Kinshasa Airport, DRC
- Lubumbashi Airport, DRC
- · Yaoundé Airport, Cameroon
- Douala Airport, Cameroon
- · Kampala Airport, Uganda
- · Nairobi Airport, Kenya
- · Mombasa Airport, Kenya
- Dar es Salaam Airport, Tanzania
- · Malabo Airport, Equatorial Guinea
- · Lusaka Airport, Zambia
- · Harare Airport, Zimbabwe
- · Cotonou Airport, Benin
- · Addis Ababa Bole International Airport, Ethiopia
- Kuala Lumpur International Airport, Malaysia
- · Singapore Changi International Airport, Singapore
- Hong Kong International Airport, Hong Kong
- · Bangkok Suvarnabhumi Airport, Thailand
- · Seoul Incheon International Airport, South Korea
- Tokyo Narita International Airport, Japan
- Tokyo Haneda Airport, Japan
- · Vientiane Wattay International Airport, Lao PDR
- · Luang Prabang International Airport, Lao PDR
- · Phnom Penh Airport, Cambodia
- Hanoi Noi Bai International Airport, Vietnam
- Ho Chi Minh City, Tan Son Nhat International Airport, Vietnam
- Dubai International Airport, UAE
- Doha Hammad International Airport, Qatar
- Istanbul Airport, Turkey
- Beijing Capital International Airport, China
- · Beijing Daxing International Airport, China
- Shanghai Pudong International Airport, China
- Shanghai Hongqiao International Airport, China
- Guangzhou Baiyun International Airport, China
- · Shenzhen Bao'an International Airport, China











#### Common shipping concealment methods

- · Recycled plastic
- Timber and wood products
- Nuts
- Metal scraps
- Cocoa
- Coffee
- Tea leaves
- Beans
- Shells
- Salt
- Frozen meat
- · Dried fish
- · Fish maw
- Skin

### Common air trafficking routes Africa

- Johannesburg to Hong Kong (JNB -HKG)
- Nairobi to Bangkok (NBO BKK)
- Antananarivo to Nairobi (TNR NBO)
- Maputo to Nairobi (MPM NBO)
- Nairobi to Guangzhou (NBO CAN)
- Luanda to Addis Ababa (LAD ADD)
- Addis Ababa to Bangkok (ADD BKK)

#### Common intermediary routes

- Maputo to Doha (MPM DOH)
- · Dubai to Hong Kong (DXB HKG)
- Dubai to Singapore (DXB SGN)
- Istanbul to Hong Kong (IST HKG)
- · Lagos to Istanbul (LOS IST)
- · Lagos to Doha (LOS DOH)
- · Cairo to Beijing (CAI PEK)
- Cairo to Bahrain (CAI BAH)
- Doha to Bangkok (DOH BKK)
- Doha to Hanoi (DOH HAN)
- Doha to Hong Kong (DOH HKG)
- Dar es Salaam to Dubai (DAR DXB)
- Jakarta to Doha (CGK DOH)
- Jakarta to Kuwait (CGK KWI)
- Jakarta to Riyadh (CGK RUH)

### Common air trafficking routes Asia

- Johannesburg to Hong Kong (JNB -HKG)
- Jakarta to Hong Kong (CGK HKG)
- Bangkok to Tokyo (BKK NRT)
- Bangkok to Hanoi (BKK HAN)
- Chennai to Bangkok (MAA BKK)
- Nairobi to Bangkok (NBO BKK)
- Bangkok to Hong Kong (BKK HKG)
- Chennai to Kuala Lumpur (MAA KUL)









#### **End Notes**

- 1. For example, two seizures of 12.9 tons and 12.7 tons of pangolin scales in Singapore were only 5 days apart from each other in April 2019, both originating from Nigeria and bound for Vietnam, organised by the same criminal network.
- 2. Themis research revealed that Japan and South Korea are often used as transit stops between Africa and China or Southeast Asia which is usually a more costly and illogical route.
- 3. For example, registered exports amount to USD 1,000,000; however, transfers received in the same time period are USD 3,000,000. Hence, there is a USD 2,000,000 discrepancy, which could derive from tax-related crime.
- 4.A "switched bill of lading" is a second set of BoL that may be issued by the carrier or their agent "in exchange of" or "substituting" the first set of BoL originally issued when the shipment was effected, eg: change of final destination, cargo routing, release parties etc. It is a common tactic to switch bills of lading in IWT in order to hide the original source and shipping route.
- 5. https://cites.org/eng/app/appendices.php

# Appendix I - CITES Certification Template

Questionable paperwork, especially anomalous, incomplete or suspicious CITES certificates are important indicators for banks and financial institutions seeking to identify suspicious transactions involved with IWT.

The CITES permit needs to be original and written, or preferably typed, in one of the three languages of CITES Convention: English, French or Spanish. The certificate demonstrated below is a sample to help identify an authentic CITES permit, and every country has slightly different variations, but the same information is required across all. It is critical to always be on the lookout for signs of non-compliance with CITES permits, such as the validity (expiration date, description of specimens and shipment), authenticity (altered legitimate permits, unusual appearance of the paper, ink spots and printed signature or stamps), and checking that the final destination on both the CITES permit and shipping documents is the same. The following sample CITES document is also available <a href="https://example.cites.com/here/berg/leg/">here/berg/<a href="https://example.cites.com/here/berg/">here/berg/<a href="https://example.cites.com/here/berg/">here/berg/

















