STILL TRADING IN EXTINCTION

THE DARK SIDE OF HONG KONG’S WILDLIFE TRADE
EXECUTIVE SUMMARY

BACKGROUND

For decades, leading scientists from around the world have been sounding the alarm citing biodiversity loss, including species extinction, as a driver of impending ecosystem collapse and, more recently, as a contributor to pandemic risk. The wildlife trade is recognised as a cause of biodiversity loss and, according to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), around 24% of all wild terrestrial vertebrate species are today traded globally. In 2019, the legal wildlife trade was estimated to be worth US$107 billion. The illegal trade has continued to thrive in its shadow.

In January 2019, members of the Hong Kong Wildlife Trade Working Group released “Trading in Extinction: The Dark Side of Hong Kong’s Wildlife Trade” which, for the first time, provided quantifiable data on the extent and nature of wildlife crime in Hong Kong spanning 2013 to 2017. It demonstrated that Hong Kong’s wildlife seizures (375MT) equated to almost a third of the volume seized by mainland China’s customs agency that year (1,237MT). The volumes seized in Hong Kong in each of 2018 and 2019 surpassed all annual totals for the preceding decade, excluding 2015 when a single exceptionally large seizure of wood took place. While the trade continues unabated, the dynamics have changed, with a decline in ivory seizures (historically a focus for local enforcement) and a dramatic increase of “Other Endangered Species” seizures (i.e. everything that is not ivory, pangolin or wood).

Indeed, 30.4MT of these “Other” species were seized in 2019 – an all-time high, and a tripling of the volume seized in 2018, which was itself threefold the volume seized in 2017. This growth also hints at diversification within the illegal wildlife trade. The increase in Other Endangered Species is of concern not least because of a general lack of transparency concerning the actual species in trade, but because many of those that could be identified are rare and threatened species destined for the exotic pet trade.

PANGOLINS REMAIN A STAPLE OF HONG KONG’S TRAFFICKERS

Pangolins, unfortunately best known as the “most trafficked mammal in the world”, remain a staple of Hong Kong’s illegal wildlife trade. In 2018 and 2019, scales and carcasses equating to as many as 50,000 pangolins were seized, equivalent to a pangolin being poached every 21 minutes for the Hong Kong trade. Hong Kong is clearly playing a pivotal role in driving these creatures towards extinction.

Each of these two years marked grim milestones. In 2018, the total volume of pangolin seized surpassed all records for the preceding eight years. In 2019, authorities made the largest pangolin seizure in the city’s history, comprising 8.3MT of pangolin scales (along with 2.1MT of raw elephant tusks). This single seizure equates to the scales of as many as 13,800 pangolins and the tusks of 200 elephants.

The significance of the illegal wildlife trade in Hong Kong is further evidenced by the volume of pangolin scales seized in the Territory arriving from Nigeria – the leading exit point for pangolin trafficked out of Africa. Of the 78MT seized from Nigerian consignments across the world in 2018 and 2019, Hong Kong’s seizures amounted to over a quarter.

WILDLIFE SEIZURES SURPASS THE PRECEDING DECADE, WHILE DYNAMICS CHANGE

In 2018 and 2019, Hong Kong authorities seized over 649 Metric Tonnes (MT) of wildlife across 1,404 seizures. These figures are indicative that despite Hong Kong’s small size, trafficking in the city is comparable to that of leading nations. In 2019, Hong Kong’s wildlife seizures (375MT) equated to almost a third of the volume seized by mainland China’s customs agency that year (1,237MT).

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SUMMARY

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MONEY MATTERS

In 2018 and 2019, illegal wildlife valued at HK$207 million was seized in Hong Kong. Compared to other lucrative crimes, the values of these seizures rank in the top five of the 58 ordinances on which the C&ED act. However, this figure is likely an underestimate of the true value of the illegal trade, not least because only a fraction of the trade is intercepted. Based on a subset of seizure data (164 events) documented in WiPS, at least 1-in-5 was valued at HK$1 million or more, six of which were estimated to be worth more than HK$5 million. The most highly valued single seizure identified was HK$62 million worth of pangolin and ivory combined.

The potential profit from such crimes inevitably provides enormous incentive for organised and serious criminal syndicates. It is vital that the financial flows of these crimes are investigated and, optimally, that proceeds are confiscated if prosecutions are to truly serve as deterrents.

THE DEVIL IS IN THE DETAIL

A snapshot of seizure events throughout 2018 and 2019 captured information including (but not limited to) the circumstances of seizures, transit routes, species taxonomies involved and details of offenders.

Just 108 such events indicate that in 2018 and 2019, wildlife was seized arriving from at least 38 countries across six continents. Most seizures were from passengers arriving at Hong Kong International Airport (HKIA). From a subset of data, it can be seen that out of 164 seizure events, 73 air passengers carried a total of 785kg of wildlife products as well as 1,234 live turtles and tortoises.

By volume, however, the overwhelming majority of wildlife was seized at Hong Kong’s seaport in Kwai Chung. Of 19 seizures involving sea cargo containers, 18 were found to contain endangered animals seized over 2018 and 2019. Although data is sparse on the manner of such smuggling, at least 2,407 live animals were discovered in checked and carry-on luggage of air passengers, with some being stuffed into clothing such as socks, as well as being concealed in trucks and cars.

In terms of species, Hong Kong’s authorities seized hundreds of tonnes of ‘threatened’ wildlife, the majority of which are at risk of extinction. A diverse range of species and products were encountered including (but not limited to) Hawksbill sea turtle shell bracelets, ivory figurines, rhino horns, rosewood logs, tobatoba maws, tiger bones, shark fins, dried seahorses, live Ploughshare tortoises, European eels and Humphrey wrasses.

Live animals were also trafficked in large numbers, with the Agriculture, Fisheries & Conservation Department (AFCD) reporting 6,991 endangered animals seized over 2018 and 2019. Although data is sparse on the manner of such smuggling, at least 2,407 live animals were discovered in checked and carry-on luggage of air passengers, with some being stuffed into clothing such as socks, as well as being concealed in trucks and cars.

Concerns are compounded by decisions not to pursue prosecutions in connection to three of Hong Kong’s most infamous seizures. 7.2MT of elephant tusks valued at HK$72 million in July 2017 and 8.3MT of pangolin scales (along with 2.1MT of raw elephant tusks) valued at HK$62 million in February 2019 and 82.5kg rhino horn valued at HK$16.5 million in April 2019. The lack of prosecution in these cases is stark, since the Security Bureau (SB) cited these as prime examples of their Syndicate Crimes Investigation Bureau’s (SCIB) “determination and capacity to conduct in-depth investigations in wildlife smuggling and combat organized crime networks.”

Despite the high values involved, none of the 2,542 wildlife trafficking cases investigated in Hong Kong between 2015 and 2019 have been linked to money laundering offences, despite strong indications from entities including the United Nations Office on Drugs and Crime (UNODC) and United States Department of Justice (US Department of Justice) and Environmental Investigation Agency (EIA) that such offences are being committed locally and in parallel with wildlife crimes.

TIME FOR REFORM - FROM TRAFFICKING HUB TO GLOBAL LEADER

To address the lack of deterrence as evidenced by the continued rise in Hong Kong seizures, an enhanced enforcement strategy is needed. Policy reform is required, to ensure that wildlife crimes are investigated thoroughly and that those who are responsible for orchestrating and/or financing these crimes are deterred. One mechanism to do this is to use the existing legal framework and to elevate wildlife offences in the legislature, with the onus on the police and customs to investigate and prosecute. This can be achieved by incorporating wildlife crime offences under the Teritory’s Organised and Serious Crimes Ordinance (Cap. 455). Indeed, in 2019 Hong Kong’s SB declared its “intention to apply the provisions of the Organised and Serious Crimes Ordinance (Cap. 455) in cases related to wildlife crimes. In early 2021, a Members Bill for such policy reform was prepared and as this document goes to print, is in the process of being submitted to the government’s legislature.

In conclusion, Hong Kong continues to have a vastly disproportionate ecological footprint for a city, let alone one of its size. As an international trade hub and a gateway to mainland China, we have an outsized responsibility to ensure that the illegal wildlife trade is not proliferating through or within our city.

This position provides us with a unique opportunity to detect, disrupt and deter organised and serious wildlife crimes as they bottleneck within the city. By updating the capacities of enforcement agencies, adopting conservation-centred approaches and meting out truly deterrent sentences to criminals and syndicates, Hong Kong can pivot from being at the heart of the problem to become a global leader in the fight against the illegal wildlife trade - with potentially far-reaching benefits for global biodiversity.
ENDNOTES


3 While C&ED report 1,404 ‘cases’ between 2018 and 2019, WiPS provides a review of 164 ‘seizure events’.


5 In 2015, an unprecedented 1,008MT of Malagasy rosewood, comprising over 7,000 logs, was seized by C&ED.


7 The average tusk weight per elephant is estimated to be 5.45kg per tusk, with an average of 1.88 tusks per individual. This suggests that the seizure may have represented the tusks from as many as 204 elephants. Refer to Appendix C4 of the report Trading in Extinction for clarification on the methodology - ADMCF (2018) Trading in Extinction: The Dark Side of Hong Kong’s Wildlife Trade. Hong Kong. Available at: https://www.admcf.org/wp-content/uploads/2019/11/Trading-in-Extinction-The-Dark-Side-of-HKs-Wildlife-Trade-Report-EN.pdf.


9 A seizure event refers to the number of instances in which a seizure was made at a specific time and location, e.g. two individuals with three different products were apprehended together arriving at Hong Kong International Airport would be counted as one ‘Seizure Event’. It should be noted that a single ‘seizure event’ does not equate directly to the number of seizures reported by C&ED, since not all of these data are publicly available and the definition of a single seizure by C&ED is unclear.


