ADM CAPITAL FOUNDATION

IWT THREAT PROFILE

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Paul Hilton / Earth Free Images

An independent report produced by ADM Capital Foundation on behalf of

united for wildlife

WWF

FOREWORD

It has been my pleasure to engage with the Hong Kong Chapter of United for Wildlife (UfW), a committed and passionate group of people who have taken up the mantle of working together to counter the illegal wildlife trade moving through Hong Kong.

Formed in March 2021, this UfW Chapter set themselves two tasks which they have successfully achieved: firstly, to get illegal wildlife crime included in Hong Kong's Organised and Serious Crime Ordinance (OSCO) and passed by the Legislative Council, and secondly to conduct an in-depth risk assessment of the region's exposure to IWT, the result of which is this report.

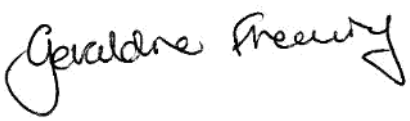
Commissioned by WWF and co-developed with ADM Capital Foundation, with input from numerous Chapter members, the report gives a snapshot of what the illegal wildlife trade looks like in Hong Kong, and what risk indicators banks, transport and other exposed industries can look out for.

Hong Kong's geographic location, free trade policy and efficiency as a logistics hub, as well as its trade history and networks, have enabled the city to become one of the world's largest trading economies, with one of the busiest ports. This status as a global financial centre and transit hub is not the only facilitator of the wildlife trade – the report reminds us that the region serves as a gateway to Mainland China, where there is a high demand for wildlife products. With both countries experiencing rising regional wealth, combined with an appetite for luxury seafood, such as shark fin and abalone, a strong and expanding Traditional Chinese Medicine market, and a large exotic pet trade, the opportunity for growth in illegal wildlife trade is plentiful. According to the report, illegal wildlife and timber contraband seized in Hong Kong between 2013 – 2021 was valued at over US$143 million[1], which begs the question as to the real value of the illicit wildlife products moving through the city.

Knowledge and information are critical tools for those working to thwart the organised and illegal wildlife trade. The Hong Kong IWT Threat Profile is not only a blueprint for risk indicators for the financial sector, it also shines a spotlight on organisations, trends, routes and patterns that private and public sectors from countries across the globe can monitor and analyse, to reduce their exposure to the illegal wildlife trade.

Regionally, the insights gained from the IWT Threat Profile have equipped this UfW Chapter to commence their next projects, bolstering their work on the use of OSCO, as well as targeted outcome-driven risk-screening projects in the finance and transport sectors.

We congratulate ADM Capital Foundation, WWF, and the members of the United for Wildlife Hong Kong Regional Chapter on an excellent and insightful report, and more importantly, on their continued commitment to countering the illegal wildlife trade.



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HONG KONG
IWT THREAT PROFILE

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This Threat Profile aims to set out the main risk scenarios and indicators that are applicable to a jurisdiction to inform an Illegal Wildlife Trade (IWT) perspective. The purpose is to provide crucial information on how the IWT threat materialises in a particular jurisdiction, to enable the creation of a data and intelligence driven transaction monitoring strategy. A list of indicators/scenarios is presented below, and a description is provided for each indicator to give context.

WILDLIFE CRIME RISK INDICATORS

Wildlife crime risk indicators have been developed for the finance industry by a number of organisations. The following modified list has been compiled from the Financial Action Task Force (FATF) and Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) to reflect the Hong Kong context. Akin to FATF, these indicators characterise potential suspicious financial activities linked to client accounts. However, one risk indicator alone, or without additional information about the client or transaction, is unlikely to be sufficient to suggest illicit activity. The indicators should be viewed in relation to the consistency of a client's profile and/or transactional behaviour. As the list is not exhaustive, it can be continuously modified based on future developments and the feedback of the members of United for Wildlife, so that we keep this document 'live'.

GENERAL WILDLIFE TRADE

Transaction Information

- Transaction details (email address, remittance information), which can refer to species or animal parts of concern for IWT, particularly regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), e.g., ivory tusk, pangolin scales, shark fins, turtles, tortoises, rosewood.
- Transaction details (including contact name, email address, remittance information), which can also specify the role of the beneficiary of funds, e.g., hunter, coordinator, supplier, breeder, trader, couriers.
- Transactions between licensed pet shop suppliers/breeders and known wildlife poachers and traffickers.
- Transfers from wildlife-related businesses to personal accounts of clients affiliated with governments, wealthy businesspeople or Politically Exposed Persons (PEPs).
- Transfers between entities engaged in wildlife trade and sharing similar names in multiple jurisdictions, especially where the Ultimate Beneficial Owner (UBO) is the same.
- Escrow-type transactions from/to accounts and companies with same UBO, in particular for payment of cross-border and transcontinental shipments.
- Large wire transfers between a wildlife-related business and a firm operating in inconsistent lines of business. Particular attention should be given to payments to firms that produce goods that may be used to conceal illicit wildlife products (e.g., manufacturers/traders of coffee, tea, beans, plastics or used clothing).
- Client receiving numerous transfers using wildlife-trade references from several parties, followed by outgoing transfers to an individual(s) (or another client) who has also received similar email money transfers from other parties, especially where there are few or no other transactions in the account. (The client may be a financial intermediary/nominee in a wildlife trade network and may be a collector of IWT-related funds.)
- Large cash or other deposits, multiple cash deposits and withdrawals, and/or unexplained wealth by government officials working in wildlife protection agencies, border control or customs and revenue officials.
- Middleman transactions – large incoming payments followed by smaller outgoing payments.

Open-Source Links to IWT

- Law enforcement information, media articles or court documentation links client or transacting parties to IWT.
- Individual or entity has open-source information linking them to the possession and/or advertising the sale of species of concern for IWT, particularly endangered species (e.g., turtle/tortoise, shark fin, ivory, rosewood, arowana).

Links to Wildlife Trade

- Individual is the owner, operator, employee or is associated with an industry that could be used to facilitate IWT (e.g., import/export of goods, fisheries wholesaler, pet store, freight company, traditional medicine, timber processing, dried seafood, breeder).
- Client provides misleading or falsified documentation concerning wildlife trade (e.g., incorrect import/export documents, fraudulent Possession Licence).
- Use of common containers, consignees, transporter, clearing agents, or exporters as seen in other cases believed to involve IWT.
- Client receiving multiple email money transfers or wire transfers referencing species or animal parts of concern (CITES-regulated species) from Hong Kong (e.g., elephant ivory, pangolin, rhino, turtle, shark, hippo teeth).
- Payments received from individuals and/or entities involved in an animal-related business (e.g., aquarium, zoo, pet store) that is inconsistent with the client's profile.

IMPORT INTO HONG KONG

Transaction information

- Transactions between entities trading animals or plants and entities operating in the traditional medicine market. This would include transaction details (email address, remittance information) that refer to traditional medicine or the traditional medicine market, live pet trade, etc., especially relating to CITES species.
- Transaction references using specimen names or veiled speech including use of foreign languages.
- Frequent transfers to individuals and/or entities linked to the wildlife trade located in jurisdictions of concern for wildlife crime (e.g., Mainland China, USA, Australia, sub-Saharan Africa, Latin America, south Asia), particularly where connected to import-export industries trade in products including plastics, timber, frozen foods, or artwork.
- Atypical payments for travel-related purchases (e.g., airfare, lodging) to and from jurisdictions of concern for wildlife crime.
- Payments for travel via several circuitous/non-direct intermediate countries, over a short period, and particularly if coupled with payments for excess baggage.
- Returning from a jurisdiction of concern for wildlife crime and where payment for travel has been made by a party or in cash, especially if an employer or someone who has not previously transacted with the individual's account.
- Live marine/seafood products purchased/consigned from landlocked jurisdictions (e.g., live reef fish from Switzerland).
- Transactions having discrepancies between the description or value of the commodity in customs and shipping documents and invoice, relative to the actual goods shipped or quoted price or the actual value in payments made.
- Commodity transport routes that are unusual based on commercial rationale, e.g., export of extremely low value commodities to a country that is a large producer.

EXPORT FROM HONG KONG

- Frequent purchases and/or payments for animal-related goods and services used to export/re-export animals from Hong Kong (e.g., animal supplies, cages, freight equipment, animal-grade foods, antibiotic/antifungal/antiparasitic treatments), particularly a business unrelated to wildlife trade.
- Frequent payments to freight forwarders, postal services, and/or cargo services.
- Reference to e-commerce or social media platforms (Facebook, eBay, Instagram, Zalo, WeChat, Taobao, T-mall, etc.) in trade transactions, especially where frequent payments are made via phone apps/social media platforms from clients to personal accounts of individuals affiliated with an animal-related business (e.g., pet store, veterinary clinic, food animal trade).

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Abbreviations	Definition
AFCD	Agriculture, Fisheries & Conservation Department
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
C&ED	Customs & Excise Department
FAO	Food and Agriculture Organization
IUCN	International Union for Conservation of Nature
MLA	Mutual Legal Assistance
UNODC	United Nations Office on Drugs and Crime
UNTOC	United Nations Convention against Transnational Organized Crime

1. A KEY LOGISTICS AND FINANCE CENTRE

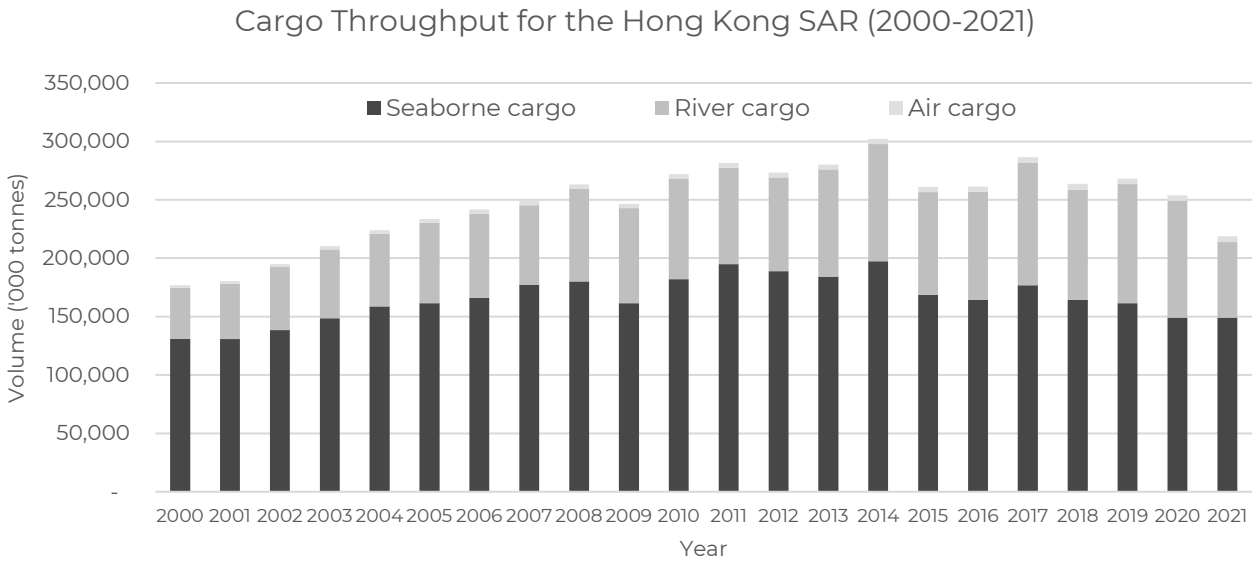
Hong Kong's geographic location, free trade policy and efficiency as a logistics hub, as well as its trade history and networks, have enabled the city to become one of the world's largest trading economies, serving as a gateway to Mainland China.

The city has one of the world's busiest trading ports. According to the World Trade Organization, in 2021, Hong Kong was the world's 6th largest trading entity in merchandise trade (including imports, exports, domestic exports and re-exports).[2]

- **Sea Cargo:** In 2021, Hong Kong's container port throughput amounted to nearly 18 million twenty-foot equivalent units, of which over 60% were transhipment cargo. Prior to the pandemic, Hong Kong ranked 8th in the world but has since declined to 9th.[3]

- **Air Cargo:** In 2021, the Hong Kong International Airport (HKIA) regained its top rank in the movement of air cargo and freight, with over 5 million metric tonnes (MT) of cargo and nearly as much freight passing through the city.[4]

- **River Cargo:** In 2021, river cargo throughput was over 64 million MT.[5] This cargo was transferred across an area that broadly includes the Pearl River, Mirs Bay and Macao, and other inland waterways in Guangdong and Guangxi, which are accessible from waters in the vicinity of Hong Kong.



- **Passenger Traffic:** Prior to COVID-19, in 2019 over 301 million passenger journeys were made through control points within Hong Kong.[6] Nearly 12 million visitors travelled through the Airport Control Point, 41 million via land control points and around 3 million through sea control points.

- **Finance Hub**: Hong Kong's banking sector comprises around 200 authorised institutions, including around three-quarters of the world's top 100 banks (based on assets), with assets valued at US$3.4 trillion.[7] Two-thirds of Mainland China's inward and outward investment originated in or was intermediated via Hong Kong. In the Global Financial Centres Index (GFCI), Hong Kong placed 4th among leading financial centres, after New York, London and Singapore.[8] Hong Kong Money Laundering and Terrorist Financing Risk Assessment Report 2022, concluded that the local banking sector continues to face a high level of risk of being exploited for money laundering (ML), commensurate with Hong Kong's status as an international financial centre and in line with the risks noted internationally.[9]

2. HONG KONG'S LEGAL WILDLIFE TRADE IN NUMBERS

- A twenty-year study of global wildlife trade data (1997-2016) placed Hong Kong among the top ten importers of wildlife products (live and dead) in the world, rivalling Germany and Thailand.[10] Hong Kong was second to Mainland China for exports of Traditional Chinese Medicine (TCM) and was also among the top three importers of ginseng and other plants[11].

- From 2013 to 2020, Hong Kong imported more live specimens for commercial purposes under CITES than any other country and territory, accounting for a third of the 12.4 million global imports of live mammals, birds, reptiles and amphibians.[12] Legal consignments of CITES-regulated wildlife arrived in Hong Kong from over 130 nations.[13] Among all live specimens[14], approximately five million were imported from 83 countries, dominated by Peru (53%), trailed by the USA, El Salvador, Indonesia and the Netherlands. Reptiles comprised the majority.

- **By number** of specimens or units, the majority (35%) were imported from Japan (dominated by saiga and bear derivatives for use in TCM), followed by France, Italy, Mainland China and Singapore, all of which primarily exported reptile skins for use in fashion.

- **By volume (kg),** Canada was the dominant exporter leading all other nations by a factor of 10 (>18,000MT of American ginseng root). It was trailed by Thailand (crocodile meat), the USA (American ginseng root & alligator meat), India (Red sandalwood) and Peru (shark fin).

- Recent research indicates that from 2012 to 2021 Hong Kong imported in the region of 350,000MT of seafood annually. Notably this is a high value trade with the Food and Agriculture Organization (FAO) estimating that in 2019,[15] Hong Kong ranked 14th globally in terms of the value of seven principal fishery commodity groups imported[16]. Limited traceability controls mean that such seafood is likely Illegal, Unreported or Unregulated (IUU).

- The above data does not include all wildlife in trade. In the case of the live exotic pet trade, CITES provides data for only two-thirds of the live animals imported into Hong Kong.

3. KEY DRIVERS

- Hong Kong is a global financial centre and transit and transhipment hub, providing ready access to Mainland China and the rest of the region, where demand for wildlife products is high.

- Alongside rising regional wealth, the increase in conspicuous consumption and appetite for luxury seafood in Hong Kong and Mainland China has driven a domestic market in high value products such as shark fin, Humphead wrasses, abalone, etc.

- Hong Kong has a strong and expanding TCM industry fully supported by the Government.[17] Imports include wildlife-based medicines such as American ginseng roots, dried seahorses, Saiga horns, Brown bear bile, ray gill rakers, snake venom and Tokay geckos.





4. HONG KONG'S ILLEGAL TRADE IN NUMBERS

4.1 VOLUMES AND COMPOSITION

Government data is available according to four main categories (Table 1) – elephant ivory, pangolin parts and derivatives, wood logs and 'Other Endangered Species' (OES). The last of these categories 'OES' refers to an aggregate of other CITES-regulated wildlife and products. Analysis of various data sources[18] has provided more granular insights for various taxa in the Government's OES category (Table 2). Within this category there have been notable seizures of wildlife including shark fins, American ginseng, European eels, totoaba, live reptiles and rhino horn.

Table 1 – Total Volumes & Values of Wildlife Seizures (2013-2021).

Source: C&ED

Product	Volume (MT)	Value (million)	No. of Seizures
Wood logs	2,485	HK$290 (US$37)	340
Pangolin scales & carcasses	70.4	HK$163 (US$21)	190
Elephant ivory	22.3	HK$232 (US$30)	504
Other endangered species (OES)	214	HK$441 (US$56)	2,963
Total	**2,792**	**HK$1,126 (US$143)**	**3,997**

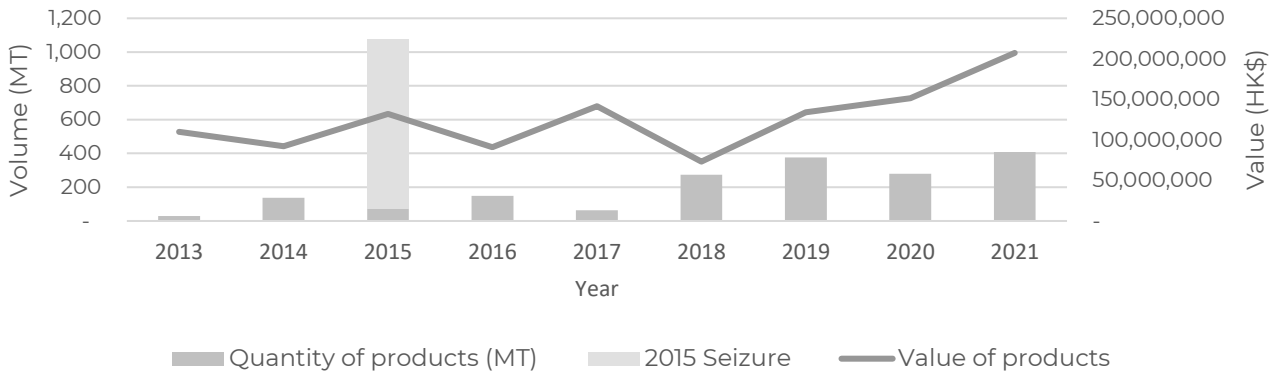
Table 2 – Minimum Volumes of Select 'Other Endangered Species' Seizures (2013-2021)

Source: Various[19]

OES (2013-2021)	MT
American ginseng (roots)	57.3
Shark (fin)	57
European eel (live)	26.3
Giant clam (shells)	7
Seahorse (dried)	1.4
Tokay gecko (dried)	1.4
Totoaba (maw)	0.4
Rhino (horn)	0.3

- From 2013 to 2021, Hong Kong authorities seized over 2,790MT of wildlife (live and derivatives) with an estimated value of HK$1.1 billion in around 4,000 events.
- 687MT of wildlife were seized in 2020 and 2021, with the volume in 2021 exceeding all annual volumes recorded since 2015. **In 2021, a record-setting HK$207 million-worth of wildlife was seized, comprising 408MT.**
- In 2021, seizures of wildlife products by local authorities were comparable to those by customs agencies in Mainland China. Hong Kong's Customs & Excise Department (C&ED) seized 408MT in 306 cases in contrast to the 646MT in 264 cases across the Mainland[20,21]
- From 2013 to 2019, large volumes of ivory, pangolin and wood were seized.
- Since 2019, ivory and pangolin seizures have significantly declined, whereas those of OES have increased in volume and value.
- From 2018 to 2019, the volume of these OES wildlife products tripled (9.1MT to 30.4MT) and then from 2019 to 2020 doubled (to 82MT), **suggesting diversification by trafficking syndicates and/or increased awareness and enforcement of local authorities**. In 2021, 66MT of OES were seized.
- From 2013 to 2021, at least 100 species of wildlife were seized, including rhino (horns), American ginseng, live reptiles, totoaba, elephant (ivory), sharks, eels, sea cucumbers, geckos, seahorses, corals, orchids and Humphead wrasses, amongst others.

Figure 1 - Annual Volumes and Values of Wildlife Product Seizures (2013-2021)



Note: A seizure in 2015, comprising ~1,000MT of Malagasy rosewood, is the largest single confiscation of wildlife products recorded.

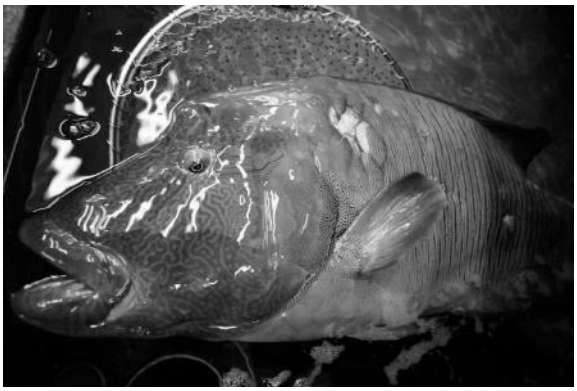
4.2 GLOBAL SIGNIFICANCE

Wildlife Product & Major Uses	2013-2021 (unless stated otherwise)	
	Legal Trade[22]	**Illegal Trade**
American ginseng (***Panax quinquefolius***) Use(s): Traditional Chinese Medicine IUCN Status: Not Assessed CITES App: II	Hong Kong has been the world's leading importer of American ginseng for many years, importing 18,800MT.[23] This equated to 87% of global imports and was nine times greater than the next largest importer, Mainland China. The majority of roots were imported from Canada.	As much as 53.5MT has been seized within Hong Kong[24], with 46MT seized in 2020 alone[25]. An attempt to traffic 7.3MT of American ginseng (valued at HK$4 million) from Mainland China in August 2018, received a sentence of HK$200,000 for the importing company.[26]
Asian arowana (***Scleropages formosus***) Use(s): Pets (live) IUCN Status: Endangered CITES App: II	Hong Kong has been among the world's leading importers for many years, receiving over 287,700 arowana from Indonesia, Malaysia and Singapore. In 2021, as the Mainland appeared to cease imports, Hong Kong imported 122,600 (85% of global imports).	Two large seizures in 2021 led to confiscations of 621 live Asian arowanas from attempted cross-boundary sea smuggling operations.[27] In 2021, a 23-member cross-border smuggling syndicate operating between Hong Kong and Guangdong was dismantled and 1,212 live arowanas seized.[28]
Crocodilians (***Crocodylia* spp.**) Use(s): Fashion (skin); Cuisine (meat) IUCN Status: Least Concern to Critically Endangered CITES App: I or II	Hong Kong was the world's leading importer of crocodilian meat, receiving over 2,600MT.[29] It was the fourth largest importer of crocodilian fashion products, importing around 4.5 million pieces of crocodile leather products and skins.[30]	Historically, there have been sizeable seizures of crocodilian derivatives in Hong Kong. [31] However, in recent years, there have been comparatively few seizures, despite the growth of the legal market. Occasional fashion items (including handbags, watch straps, belts) and pieces of skin have been seized in a limited number of seizures.[32]

Elephant **(*Elephantidae* spp.)** Use(s): Decoration (carved); Jewellery (worked) IUCN Status: Endangered to Critically Endangered CITES App: I or II	Hong Kong accounted for 55% of global elephant ivory imports from 2013-2021, receiving 5MT of tusks, carvings, etc. A further 16,200 carvings and 1,949 tusks were also imported. As of December 2020, 293 Possession Licences for 50.7MT were valid. The local trade in all but antique ivory (harvested or significantly altered pre-July 1925) was banned in December 2021.[33] Mammoth ivory and hippo teeth (trades in which Hong Kong has also led global imports) are often sold in the same shops and carved into similar products. At least 179MT of mammoth ivory[34] and 8.2MT of hippo teeth were imported [35] in recent years, raising concerns of laundering.	According to the United Nations Office on Drugs and Crime (UNODC), Hong Kong and Vietnam "lead the world in ivory seizures."[36] Local authorities seized 22.3MT of ivory valued at HK$231.6 million. The largest seizure in Hong Kong comprised 7.2MT of raw ivory (3,179 tusks), valued at HK$72 million, from a container arriving from Malaysia in 2017.[37] Since the ban, two shops (in Central and Yau Tsim Mong) have been caught attempting to illegally sell ivory from their stockpiles.[38]
European eels **(*Anguilla anguilla*)** Use(s): Cuisine IUCN Status: Critically Endangered CITES App: II	Exporters shipped over 1,000MT of mostly dead European eels to Hong Kong from 2011 to 2020, making Hong Kong the third-largest recipient of the species, after Mainland China and Japan.[39]	The UNODC has noted that Hong Kong was "the most common destination" for trafficked European eels from 2011-2018. [40] Over this period, UNODC recorded seizures of 27.3MT globally. From 2011 to 2020, Hong Kong authorities seized approximately 26MT of European eels, dominated by a single 25.3MT seizure in 2019.[41]
Humphead wrasses **(*Cheilinus undulatus*)** Use(s): Cuisine IUCN Status: Endangered CITES App: II	Hong Kong accounted for 91% of global imports of Humphead wrasses, receiving over 9,800. All originated from the wild in Indonesia (the majority 'Ranched'). 'Plate-sized' fish (juveniles, prior to reproductive maturity) are preferred.	The numbers of Humphead wrasses documented through market surveys in Hong Kong far exceed the documented imports, strongly indicating laundering. The species is typically sold within a matter of weeks and cannot survive for extended periods in captivity. At least 31 restaurants, shops, etc. have been convicted and 56 live Humphead wrasses confiscated since 2013.
Pangolin **(*Manidae* spp.)** Use(s): Traditional Chinese Medicine (scales); Cuisine (meat) IUCN Status: Vulnerable to Critically Endangered CITES App: I or II	Hong Kong accounted for just under half of global imports of pangolin scales from 2013 to 2017 with 14.3MT (pangolin was banned from the legal trade in 2018).[42] Hong Kong was then second only to Mainland China, which imported 15.4MT. Assessments indicate that the average weight of scales is between 0.36kg and 3.60kg per individual pangolin.[43]	From 2015 to 2019, 42% of the 195MT of pangolin scales seized throughout Asia originated in Africa and were seized in or bound for Mainland China or Hong Kong.[44] Hong Kong's seizures in 2018 and 2019 likely amounted to a quarter of global seizures of scales from Nigeria (the largest exporter at the time).[45]

Ploughshare tortoise (*Astrochelys yniphora*) Use(s): Pets (live) IUCN Status: Critically Endangered CITES App: I	Hong Kong has not received any Ploughshare tortoises through legal channels since at least 1975. Fewer than 200 individual adults are thought to survive in the wild.	Hong Kong authorities have confiscated at least 12 individuals in two seizures (10 in 2014, 2 in 2019) over the last decade. While small, these seizures potentially represented the rescuing of 6% of the species' wild population. Despite the absence of legal imports, the species has been seen in online advertisements (c. 2015-2016[46]) and seen in private hands[47].
Red sandalwood (*Pterocarpus santalinus*) Use(s): Furniture (logs); Traditional Chinese Medicine (chips) IUCN Status: Endangered CITES App: II	From 2013-2020, at least 1,212MT of Red sandalwood was legally imported, mostly from India.[48] Hong Kong was then second only to Mainland China, which imported 6,170MT. UNODC assessed that the average weight of a single log is approximately 15kg.[49]	The UNODC has identified Hong Kong as the second-largest destination for illegal shipments of Red sandalwood and Dalbergia woods globally between 2005 and 2015.[50] From July 2021 to January 2022 Hong Kong authorities made at least 12 seizures comprising 24.6MT of Red sandalwood valued at HK$80.6 million.
Reptiles (*Reptilia* spp.) Use(s): Pets (live) IUCN Status: Not Assessed to Critically Endangered CITES App: I, II or III	Hong Kong was the largest overall importer of live reptiles, receiving 4.2 million CITES-regulated reptiles, the majority of which were turtles or tortoises (*Testudines* spp.). Hong Kong was the largest importer of live reptiles in 7 of the 9 years from 2013 to 2021.	As many as 22,000 live turtles and tortoises were seized by Hong Kong authorities from 2013 to 2022.[51]
Rosewood (Especially *Guibourtia* & *Dalbergia* spp.) Use(s): Furniture (logs); Traditional Chinese Medicine (oil) IUCN Status: Not Assessed to Critically Endangered CITES App: I or II	Hong Kong was the largest importer of Nicaraguan rosewood (*D. retusa*), receiving all 26.6MT of logs sourced from the wild in 2017. UNODC assessed that the average weight of a single log is approximately 125kg.[52]	The UNODC has identified Hong Kong as the second-largest destination for illegal shipments of Red sandalwood and Dalbergia woods globally between 2005 and 2015.[53] At least 1,880MT of various rosewood logs were seized between 2014 and 2021. At least 138MT of Nicaraguan rosewood logs were seized in 2018 alone. In 2019, 74.4MT of *Guibourtia* spp. logs were seized.
Saiga (*Saiga* spp.) Use(s): Traditional Chinese Medicine (horns) IUCN Status: Critically Endangered CITES App: II	Hong Kong dominated global imports, with over 290,300 Saiga horn-derived medicines plus around 4.9MT of horns.[54] Horns typically weigh 100-200g each. Saiga horn usage is regulated under the Chinese Medicine Ordinance but there is no information available on local stockpiles.[55]	There is limited data on seizures of Saiga at a global level.[56] In Hong Kong, authorities notably discovered 224 horns (50kg) being trafficked into the city from Russia in 2019.[57]

Seahorses & pipefish (*Syngnathidae* spp.) Use(s): Traditional Chinese Medicine (dried body) IUCN Status: Critically Endangered CITES App: II	Hong Kong led imports of seahorse (*Hippocampus* spp.) bodies, receiving 3.1MT (representing hundreds of thousands of seahorses).	A combined 1.6MT were seized in 30 seizures in Hong Kong. Estimates indicate that even a small seizure comprising 20kg equates to between 7,000-17,300 individual seahorses.[58]
Shark **(*Elasmobranchii* spp.)** Use(s): Seafood (fin); Traditional Chinese Medicines (rakers); Fashion (skin) IUCN Status: Not Assessed to Critically Endangered CITES App: I or II	Hong Kong was the third-largest importer of CITES-regulated shark derivatives. However, Hong Kong dominated global imports of shark fins – accounting for 680MT, six times that of second-placed Singapore. Hong Kong specifically led imports of fins from Silky sharks (*Carcharhinus falciformis*), Pelagic threshers (*Alopias pelagicus*), Smooth hammerheads (*Sphyrna zygaena*) and Common threshers (*Alopias vulpinus*).	Shark fin seizures have been increasing in recent years. At least 52MT of fins from CITES-regulated species were seized between 2013 and 2020. In 2021, a single seizure netted 10MT of shark fins from a warehouse implicated in cross-border sea smuggling, estimated to equate to around 15,000 sharks.[59]
Yellow-spotted river turtle (*Podocnemis unifilis*) Use(s): Pets (live) IUCN Status: Vulnerable CITES App: II	Hong Kong has been the largest importer of Yellow-spotted river turtle in the world, accounting for 75% of global imports. The species is also the most heavily traded, amounting to over a quarter of all live reptiles traded under CITES.	From 2007 to 2017 the Yellow-spotted river turtle was the most seized species around the world.[60] Hong Kong's largest seizure of live exotics included 11,687 Yellow-spotted river turtles.[61]






4.3 VALUES

Valuations for wildlife products can vary significantly depending on the rarity, source, level and quality of working/processing, the legality of the product, unique physical traits (e.g., colour variants/morphs, deformities such as being conjoined) and more. The Hong Kong Government provides valuations based on market surveys, interviews with traders and research.[62] However, initial estimates are often revised during court proceedings. The per kilogram valuations for seizures presented below are generalised, based on a simple division of value by the quantity of product. As such, there may be exceptionally high value products or individuals within the seizure that skew the values. These numbers should, therefore, not be taken at face value. Estimates are provided below from a variety of sources:

Product	Values		
	Legal Market	**Hong Kong Seizures**	**Black Market**
American ginseng	Cultivated roots: **HK$156-546/kg**[63] (2022)	Roots: **HK$553-2,307/kg**[64] (2014-2018)	Wild-harvested roots: **HK$4,290-17,160/kg**[65] (2022)
Asian arowana	Live "albino": **HK$2,340,000/fish**[66] (2016) Live "violet fusion red": **HK$93,600/fish**[67] (2016) Live "chilli red": **HK$10,920/fish**[68] (2016)	Live, juveniles: **HK$3,000/fish**[69] (2021) Live, adult: **HK$1,388-6,940/fish**[70] (2017)	Live "super red": **HK$5,850/fish**[71] (2017) Live "red golden" : **HK$1,950/fish**[72] (2017)
Birds (live)	Various parrots, live: **HK$165-31,975/bird**[73] (2020, Mainland China)	African grey parrot, live: **HK$6,500-13,000/bird**[74] (2019)	No data for Hong Kong. African grey parrot, live: **HK$470-2,890/bird**[75] (2020-2021, Africa)
Elephant (ivory)	Carved piece: **HK$230,770/kg**[76] (6.5kg @ HK$1,500,000) (2019) 1 pair of chopsticks: **HK$2,000**[77] (2019)	Raw/minimally worked: **HK$10,000/kg**[78] (2013-2021) <1kg (17 carved pieces): **HK$23,000**[79] (2022) 1 pair of chopsticks: **HK$780-3,300**[80] (2017-2018)	Raw ivory: **HK$4,655-5,375/kg**[81] (2015-2019) Worked ivory: **HK$49,450/kg**[82] (2014-2018)

European eels	Glass eels/elvers, live: **HK$23,550-39,250/kg**[83] (2021, USA)	Glass eels/elvers, live: **HK$10,700- 13,370/kg**[84] (2018)	Glass eels/elvers, live: **HK$11,623-50,310/kg**[85] (2022)
Humphead wrasses (*Cheilinus undulatus*)	Live, wholesale: **HK$1,200/kg**[86] (2005-2016) Live, retail: **HK$1,570/kg**[87] (2016)	No data for Hong Kong.	No data for Hong Kong.
Pangolin (scales)	Scales: **HK$11,000**[88] (2017-2018) Roasted scales, retail: **<HK$13,600/kg**[89] (2012-2016, Mainland China) Roasted scales, hospital: **<HK$11,900/kg**[90] (2012-2016, Mainland China)	Across multiple seizures: **HK$3,900/kg**[91] (e.g., 50kg@ HK$196,000) (2015-2020)	No data for Hong Kong.
Rhino (horn)	No data for Hong Kong. (Note: only pre-Convention rhino horn products may be considered for sale in Hong Kong. A certificate is required for possession.)	Across multiple seizures: **HK$200,000/kg**[92] (e.g., 82.5kg@ HK$16,500,000[93]) (2015-2019) Range per kg: **HK$265,400/kg to HK$546,400/kg**[94] (15.93kg @ HK$4,228,000 – HK$8,704,000) (2020)	Average for worked horn: **HK$384,540/kg**[95] (2014-2018) Average for wholesale horn: **HK$189,540/kg**[96] (2014-2018)
Red sandalwood (log)	No data for Hong Kong.	Across multiple seizures: **HK$400-5,000/kg**[97] (e.g., 547 kg @ HK$443,000) (2015-2023)	No data for Hong Kong.
Reptiles (live)	**Snakes:** Ball python, live: **HK$2,000-8,000/snake**[98] (2023)	**Snakes:** No data for Hong Kong.	No data for Hong Kong.

	Turtles/tortoises: McCord's box turtle, live: **HK$98,000/turtle**[99] (2023) Big-headed turtle, live: **HK$19,230-62,745/turtle**[100] (2021-2023, USA) Golden coin turtle, live: **HK$18,800/turtle**[101] (2023) Ringed map turtle hatchling, live: **HK$6,800/turtle**[102] (2023) Chinese stripe-necked turtle, conjoined, live: **HK$6,800/turtle**[103] (2023) African spurred tortoise, live, adult: **HK$3,500/turtle**[104] (2023) Leopard tortoise, live: **HK$980-1,780/tortoise**[105] (2023) Alligator snapping turtle hatchling, live: **HK$488/turtle**[106] (2023) Common snapping turtle hatchling, live: **HK$98/turtle**[107] (2023)	**Turtles/tortoises:** Black pond turtle, live: **HK$1,675-2,000/turtle**[111] (2015-2017) Big-headed turtle, live: **HK$1,487/turtle**[112] (2018) African spurred tortoise, live: **HK$1,000/turtle**[113] (2018) **Lizards:** No data for Hong Kong.	

	<u>Lizards:</u> Knob-tailed gecko, live: **HK$9,999/lizard**[108] (2023) Argentine black and white tegu, live: **HK$300/lizard**[109] (2023) Common green iguana, live: **HK$300/lizard**[110] (2023)		
Saiga (horn)	Horn (whole): **HK$1,600-1,900/tael (0.4kg)**[114] (2019) Horn shavings: **HK$157-251/pack**[115] (2021, Thailand)	Horn (whole): **HK$14,410-23,810/kg**[116] (2019)	No data for Hong Kong.
Shark and ray (fin)	Blue shark fin, dried: **HK$1,080-2,780/catty (0.6kg)**[117] (2022) Shark fin offcut, dried: **HK$1,730-6,048/kg**[118] (2023)	Shark fin, dried: **HK$250-33,300/kg**[119] (2015-2020) Note: The extreme difference in value maybe due to the inclusion of an unknown quantity of high value fins. Ray, dried gill rakers: **HK$2,730/kg**[120] (2020)	No data for Hong Kong.
Totoaba (maw)[121]	Dried maws, retail: **HK$157,000-628,000/kg**[122] (2018)	Fresh maws: **HK$160,000/kg**[123] (46kg @HK$7,400,000) (2021) Dried maws: **HK$222,222/kg**[124] (14.4kg @HK$3,200,000) (2021)	No data for Hong Kong.

US$1 =HK$7.8

- Rising values and volumes (see Section 4.1) are also a function of criminal operations relying on larger volume shipments[125], as other modes of transport have been hampered by restrictions and reduced movement. Nevertheless, the volume and value of the illegal trade has continued to rise. The value of wildlife seizures reached an all-time high in 2021, exceeding HK$207 million, following four years of growth.

4.4 Entry and Exit Points

- There are as many as 24 locations where individuals and cargo may enter or exit the city legally.[126]

- By number of cases, the majority of seizures are made at the HKIA. By volume, most wildlife is seized at the Kwai Chung Container Terminal.

- Seizures have been made across at least ~100 other locations outside of official border control points and other entry/exit points.

5. TRENDS AND PATTERNS

5.1 Countries

Illegal consignments of CITES-regulated wildlife arrived in Hong Kong from at least 64 nations between 2013 and 2022. The top 5 nations by frequency were:

- Nigeria (pangolin scales, elephant ivory)
- South Africa (pangolin scales, elephant ivory, rhinoceros)
- Zimbabwe (elephant ivory)
- Cote d'Ivoire (elephant ivory)
- Mainland China (American ginseng roots, pangolin scales, elephant ivory, orchids)

5.2 Seasonality

- Around holidays, where gifts or special cuisine are expected, such as Chinese New Year, Mid-Autumn Festival, etc., there are increases in the trade of high-value wildlife products. These may be utilised in foods (e.g., Humphead wrasses, shark fins, abalone), traditional medicines or health tonics (e.g., American ginseng, seahorse) or as gifts (e.g., ivory, orchids).

- Based upon announcements of seizures, there are spikes in December (Christmas and New Year[127]) and the Lunar New Year[128] in particular. There are increases in the flow of trade and passengers across border control points during these periods. There are indications that species perceived as auspicious, health-related and high-value, such as orchids, American ginseng and seahorses, are trafficked in greater volumes over Lunar New Year.[129] The greater number of seizures over such periods is also likely a function of increased vigilance, scrutiny and planned operations undertaken by law enforcement. [130]

- There are patterns in consumer demand in general as a result of traditional beliefs. For example, turtle, snake or other reptile derivatives may be traded in greater numbers in foods and medicines during the winter months due to the belief that they warm the consumer's blood.[131]

- Around auspicious dates in the Buddhist and Taoist calendar, such as Buddha's Birthday or celebrations related to Guanyin (Goddess of Mercy), there are also upticks in the volumes of animals traded specifically for 'mercy release,' which are large scale abandonments of dozens to thousands of animals.[132] Birds (e.g., munias, white-eyes, seedeaters) were long preferred in such ceremonies but their use has been reduced in Hong Kong following outbreaks of avian influenza and education campaigns by the Government and local NGOs. Over the last decade, reptiles (e.g., Red-eared slider), amphibians (e.g., bullfrog), fish (e.g, Sabah grouper, pompano, seabream) and all manner of marine invertebrates have become increasingly used in release ceremonies.

5.3 Seizure Patterns

A variety of goods and materials have been used to conceal illegally imported wildlife products. Wildlife is often trafficked alongside legitimate goods, sometimes products of similar approximate shape or size e.g., totoaba maws underneath frozen fish, or else goods which can help camouflage, e.g., ivory tusks under soya, pangolin under waste plastic. False or deceptive declarations or labels have also been used to mislead authorities and conceal wildlife. Examples are provided in Table 3 below. Foreign languages have also been used to confuse customs officials. As examples, Scalloped hammerhead shark fins[133] have been labelled "Ailerons de requins seches" (French for dried shark fin) and Honduran rosewood[134] has been labelled "Holz" (German for wood).

Table 3 – False Declarations & Methods of Concealment (2013-2022)

Product	Categories	Declaration Terms and/or Products Used to Conceal
American ginseng	Health products	Health products
Dried reptiles	Foodstuff	Pet food
Elephant ivory	Construction materials Consumer good Agricultural products Foodstuff Seafood products	Plank, Decorative tiles, Architectural stones, Red cam process wood, Assorted handcraft, Wood doll, Assorted goods, Toys, Soya, Pet food, Frozen fish
Giant clam shells	Scrap or waste materials	Metal scraps
Live reptiles	Consumer goods Foodstuff	Toys, Cloth, Shoes, Used books, Chocolate, Cereal
Manta ray gills	Seafood products	Dried fish gills
Pangolin scales	Construction materials Foodstuff Plastic materials & scrap Cosmetics Seafood products	Stone, Zingana sawn timber, Food, Fresh fish, Frozen beef, Plastic scrap, Polyethylene, Plastic materials, Sliced plastics, Plastic PET, Recycled plastic particles, Metal scrap, Mascara, Charcoal
Red sandalwood logs	Wood-based products Consumer goods Ore Foodstuff	Gypsum drywall boards, Furniture, Furniture parts, Wooden Furniture, Furniture raw materials, Decoration raw materials, Guitar parts, Ceramic flower pots, Glass flower pot, Woven fabric, Bauxite, Indian fresh vegetable onion
Rhinoceros horn	Machinery Foodstuff Consumer goods	Auto parts, Cashew nuts, Coffee, Resin crafts, Toys
Rosewood logs	Scrap or waste materials Alternative woods	Rubber waste, Wood timber
Seahorses	Fashion materials Cosmetics Seafood products	Wet salted leather, Body scrub, Sea cucumber, Fish maw
Shark fin	Seafood products	Dried fish, Fish maw, Dried fish fillets, non-CITES shark fin
Totoaba	Seafood products	Frozen fish fillets

6. PERPETRATORS

6.1 KNOWN INDIVIDUALS AND NETWORKS

Entities	Status	Details of Activities
Vanny Group	Active	• Vanny Group consists of several private Hong Kong-registered companies with operations in Cambodia, Vietnam and Mainland China. • Its principal business is production, breeding and husbandry of Long-tailed macaques for use in scientific and academic research. [135] The Group is a well-established supplier of macaques for medical facilities in the USA, EU and UK. • On 16th November 2022, the US Fish & Wildlife Service (USFWS) charged members of "international primate smuggling ring" with multiple felonies for their role in smuggling wild Long-tailed macaques into the United States.[136] • Six high-ranking personnel within the Vanny Group were indicted and charged with smuggling and conspiracy to violate the US Lacey Act and the Endangered Species Act. • Two officials of the Cambodian Forestry Administration, Ministry of Agriculture, Forestry and Fisheries, were also charged with smuggling and conspiracy. One, Masphal Kry, was arrested in November 2022.
Zhao Wei Transnational Criminal Organisation (TCO)	Active	• Zhao Wei is the de facto ruler of "Laos Vegas" or "Macao of the Mekong" – and boss of the Kings Roman Group (KRG). • The Zhao Wei TCO exploits the Golden Triangle Special Economic Zone to engage in wildlife trafficking of endangered and vulnerable animals, including Asiatic black bears, pangolins, tigers, rhinos, and elephants. • The TCO was sanctioned by the US Treasury in January 2018.[137] Two KRG companies were named in the filing – one registered in Hong Kong (as of March 2020) and the other in Thailand. • Zhao Wei currently holds property as well as companies within Hong Kong. The TCO is reported to be expanding operations, developing a new port, traditional medicine factory and an international airport.[138]
Red Sanders Mafia	Active	• Trafficked Red sandalwood has often been linked to India and the United Arab Emirates (UAE). Authorities and researchers have repeatedly connected organised criminal groups – the so-called 'Red sanders mafia' – operating within those jurisdictions to Hong Kong.[139] • In December 2021, the Directorate of Revenue Intelligence and Customs officials in India seized 12MT (379 logs) of Red sandalwood outbound for Hong Kong.[140] Earlier in the year, Indian authorities dismantled a network of cargo firms and transporters engaged in trafficking Red sandalwood from India through Dubai to Hong Kong.[141] • This trade route has been used for many years to obscure the destination of the products and possibly as a result of the displacement of prominent Red sandalwood traffickers from India to UAE in the early 2000s. [142] Other transit countries including Bangladesh, Malaysia and South Korea have also been used by traffickers.[143] • Within Hong Kong, there are indications that organised criminal groups have facilitated the illegal export of Red

		sandalwood. A group of 13 individuals were apprehended trafficking logs from Sai Kung into Mainland China (most likely Huidong) by speedboat in 2017. (Note: the group also allegedly laundered around HK$30 million through a Hong Kong money exchanger.) • There have been numerous attempts to illegally export red sandalwood via speedboat, with seizures in waters all around Hong Kong (off Sai Kung, Yuen Long, Tuen Mun, Lantau, etc.).[144]
Kang Juntao	Convicted (October 2021[145])	• In December 2020, Chinese citizen Kang Juntao was extradited from Malaysia to the USA for trafficking of at least 1,500 protected turtles from the USA to Hong Kong and Mainland China, valued at around US$2.25 million, as well as laundering the proceeds of the crime.[146] • The offences were committed across at least five states in coordination with mostly Chinese nationals in the USA on student visas. • The smuggling ring trafficked at least five CITES-regulated species. The turtles were "*inhumanely bound*" with duct tape and hidden in socks when they were shipped. • Kang was sentenced in October 2021 in the USA to 38 months in prison and one year of supervised release.[147]
Terry Wu TCO	Indicted (July 2020[148])	• Wu ran **Serendipity Business Solutions** in California, smuggling shark fins from Mexico to Hong Kong via California through a front company in Florida (Phoenix Fisheries). • In undercover Operation Apex, involving seven US Government agencies, more than 6MT of shark fins were documented being trafficked to Hong Kong and nearly US$8 million in assets were seized.[149] In addition, 18 totoaba fish bladders were also confiscated. • The illicit proceeds were wired to third party business bank accounts through two co-conspirators, Heather Huong Ngoc Luu and Lam Phuoc Quang, who received commission fees.
Multiple live reptiles trafficking operations	-	• Live reptile trafficking operations between Hong Kong and the USA have ranged from individuals coordinating informally with overseas accomplices (e.g., Renee Vargas[150]) to sophisticated and professionalised networks of poachers, shippers and middlemen dealing in thousands of live reptiles and earning millions (e.g., Kang Juntao[151]). • Most succeeded in operating for many years without detection, using simple concealment methods. For instance, four smuggling operations between Hong Kong and the USA since 2014 simply mislabelled consignments as "toys".[152] • Many have relied on social media, particularly Facebook, to coordinate their crimes[153], find buyers[154] and dealers[155]. While many conspirators in the USA have been apprehended, it is unclear what has become of Hong Kong-based accomplices.

Li Zhifei	Convicted (May 2014[156])	• Li is a Chinese national who was the owner of the antiques shop 'Overseas Treasure Finding' in Shandong Province, and was identified as the "ringleader" of an ivory and rhino smuggling ring. He was apprehended and indicted in February 2013 through the USFWS's "Operation Crash".[157] • The criminal enterprise "smuggled rhinoceros horns and art objects made from rhinoceros horn and elephant ivory to Li in Mainland China by way of Hong Kong".[158] • Li took over the business after his "Business Associate" was arrested in Mainland China for smuggling ivory, coordinating and overseeing a series of successful smuggling actions. He trafficked at least 30 raw rhinoceros horns and derivative products, as well as ivory from the USA into Mainland China, via Hong Kong, collectively worth more than US$4.5 million (HK$35.1 million).[159] • A "money broker in Hong Kong" facilitated the transfer of funds under the names of people other than Li, allowing him to circumvent Mainland China's currency transfer limits, as well as hiding his activities from Chinese and American authorities.[160] • An unidentified Hong Kong-registered corporation was also implicated for wiring US$59,000 to a dealer based in Long Island City in payment for rhinoceros horns. • Li was convicted in May 2014 and sentenced to serve 70 months in prison.[161]






6.2 COMPANIES

Local arrests and prosecutions: Numerous companies have been implicated in a variety of wildlife offences, including some of the largest-scale and potentially most consequential trafficking operations in Hong Kong. Below are examples of retailers, logistics companies, restaurants and other entities connected to wildlife trade that have been implicated in or convicted for wildlife crimes.

Entities	Status	Details of Activities
Unidentified shop in Yau Tsim Mong District (July 2022)	Seizure (investigation ongoing)	284 pieces of suspected elephant ivory were confiscated from a premises suspected of possessing scheduled elephant ivory for commercial purposes.[162] AFCD were conducting inspections in the Yau Tsim Mong District when they detected the suspected breach of local regulations. The shop received a warning. However, as no action to remedy the situation was taken by the shop AFCD mounted an operation shortly thereafter. Investigation ongoing.
Unidentified shop in Central & Western District (January 2022)	Seizure (investigation ongoing)	17 pieces of suspected elephant ivory were confiscated from a shop.[163] AFCD were conducting inspections in the Central and Western District. They suspected that the shop was illegally selling elephant ivory products banned from trade as well as selling antique elephant ivory without requisite proof. Investigation ongoing.
Unidentified Mong Kok trading company (February 2019)	Arrested (released on bail, outcome unknown)	A proprietor (male) and staff member (female) were arrested in connection with a seizure of 8.3MT of pangolin scales and 2.1MT of ivory tusks (valued at HK$62 million) seized from a container arriving from Nigeria.[164] C&ED mounted a joint operation with Mainland Customs to combat cross-boundary trafficking. Information was received from Mainland Customs and through intelligence analysis and risk assessment. This remains the largest seizure of pangolin scales in Hong Kong. No parties are known to have been prosecuted.
New Po Lung Seafood (December 2018)	Convicted	The restaurant was found to be illegally possessing two live Humphead wrasses.[165] The restaurant was fined HK$50,000.
Shiqibang Trade Co. Limited (August 2018)	Convicted	The company and its truck driver (male) were successfully prosecuted for illegally importing 7.3MT of American ginseng (valued at HK$4.04 million) from Mainland China.[166] The company was fined HK$200,000 and the driver received a 4-month suspended custodial sentence.
Unidentified Sheung Wan dried seafood shop (June 2018)	Arrested (released on bail, outcome unknown)	Two directors of the shop (one male, one female) were arrested in connection with an attempt to smuggle 140kg of dried seahorses and 220kg of dried shark fins inside a container arriving from Indonesia.[167]
Rainbow Bridge Pet Cremation Services Limited (January 2018)	Convicted	The company director (male) and a staff member (female) were charged and prosecuted in connection with illegally possessing CITES Appendix I and II species, including otters, owls, Giant salamanders, Black pond turtles and monitor lizards.[168] Several animals had been illegally kept at the premises of the crematorium, others in the private residence of the director and in a nearby shed. Hundreds of animals were discovered across the three locations. The director was sentenced to a 12-month probation and HK$2,000 deposit,

		the company was fined HK$35,000 and the charges were withdrawn for the female staff member.
Unidentified Tuen Mun trading company (July 2017)	Arrested (released on bail, outcome unknown)	The male proprietor and two female staff members were arrested for their involvement in the smuggling of 7.2MT of ivory tusks arriving from Malaysia.[169] This remains the largest seizure of ivory in Hong Kong. No parties are known to have been prosecuted.

6.3 HK-LINKED ENTITIES (PROSECUTIONS OVERSEAS)

Hong Kong-linked individuals and companies have also been implicated in prosecutions and seizures overseas.

Entity	Details of Activities
Asia Aquatic Company, Ltd. (2021) **Nelson Chan King Sheung**	• While working for the **Hong Kong-based Asia Aquatic Company, Ltd.** and a **Canadian company, Laknock Trading**, Nelson Chan King Sheung would illegally procure American glass eels from North America for overnight air shipment to Hong Kong.[170] • He was known to have smuggled 103kg of eels in 2017 (valued at US$340,000) and a further 19.3kg (valued at US$86,000) in 2021. • Chan was sentenced to eight months imprisonment in the USA in December 2021.
Icelandic Commodities Exports Ltd. (2020) **Gilbert Khoo**	• Gilbert Khoo trafficked European eels valued at around £53 million (HK$550 million) from Europe to Hong Kong and Malaysia. The typical method of concealment was to hide the eels under chilled seafood (a method previously used by traffickers of totoaba[171], ivory[172] and pangolins[173]) for his company **Icelandic Commodities Exports Ltd**. • He succeeded in delivering at least 16 consignments between 2015 and 2017.[174] • Khoo was apprehended as he attempted to smuggle 200kg of eels through Heathrow Airport. • During the trial, Khoo characterised himself as a "middleman" and extensive inventories of payments to and from a Hong Kong businessman (whose company had been receiving the eels) were introduced by prosecutors.[175] • Khoo received a two-year suspended sentence in the UK in March 2020.[176]
Reptile Paradise (2019) **Vincent Cheung Nai Chun, Michael Allen Pata**	• Vincent Cheung Nai Chun, owner of **Reptile Paradise** in Hong Kong, was charged for his involvement in arranging and paying for the smuggling of CITES Appendix I and Appendix II species to Hong Kong.[177] • The live reptiles were sent by Cheung's co-conspirator Michael Allen Pata, who ran a Florida business also called Reptile Paradise. • Regulated animals were concealed under layers of non-CITES species that had also been illegally acquired. Numerous shipments were sent over the 18-month observation period. • Cheung was sentenced to six months imprisonment, fined US$5,000 and subject to three years supervised release in the USA in December 2019.[178]

6.4 USE OF MULES

The majority of court cases observed in Hong Kong involve 'mules.'[179] These were mostly fairly insignificant individuals who were employed (often *ad hoc*) by more organised networks to facilitate the transfer of wildlife from one jurisdiction to another. Typical characteristics include:

- Recruitment by contacts asking them to do a favour, i.e., transporting the wildlife on their behalf. The contact may be a friend, boss or acquaintance who they met during a trip, through friends, etc. The mules were then enlisted on a one-off basis, or else the offence may be committed as part of a longer-term operation (e.g., cross-border parallel trading, couriering).
- Mules were often incentivised by the promise of payment or covering travel and accommodation expenses.
- Some mules have cooperated with law enforcement, providing names (often nicknames), mobile numbers and have even facilitated meetings with their contacts. However, such controlled operations, where known, have yielded limited success in leading to more significant figures involved in coordinating the crimes.













7. Convergence with Other Crimes

Network	Activities
Zhao Wei TCO (Laos)	The Zhao Wei TCO was sanctioned by the US Treasury in January 2018 for its involvement in drug trafficking, human trafficking, money laundering, bribery, and wildlife trafficking, much of which is facilitated through the Kings Romans Casino located within the Golden Triangle Special Economic Zone in Laos.[180] Reporting has indicated plans to expand operations, including developing a new port, a traditional medicine factory and an international airport.[181]
Triad societies (Hong Kong)	The Hong Kong Police Force (HKPF) made a series of seizures and arrests in February 2017 involving eleven alleged members of a triad society caught in the act of smuggling several tonnes of Red sandalwood, electronic goods and money into Mainland China.[182] The cross-border syndicate had reportedly been operating for over two years, sometimes making several smuggling runs per week to Guangdong Province. In addition to their smuggling activities, the gang was also reportedly involved in money laundering, with the daughter of one of the suspected ringleaders purportedly operating a money exchange service in Tai Po. She had used her own bank accounts and the exchanger to launder up to HK$30 million, according to reports.
Terry Wu TCO (USA)	Operation Apex uncovered a "sprawling, transnational conspiracy" that combined drug and wildlife trafficking with extensive money laundering across the USA, Hong Kong, Mexico and Canada.[183] Terry Xing Zhao Wu operated out of California, conspiring with a dozen associates from 2010 to 2020 to commit offences including to smuggle shark fins from Mexico to Hong Kong, marijuana across North America and to conceal millions of dollars in profits as purported seafood transactions.[184]

7.1 Cross-boundary smuggling (speedboats)

- Trafficking using speedboats is a common means of smuggling that has been adopted by syndicates to transport all manner of goods rapidly between Hong Kong and Mainland China.[185] In 2020 alone, C&ED detected 27 sea smuggling cases involving CITES-regulated wildlife.[186]
- An operation in October 2021 netted HK$210 million-worth of goods from a warehouse in Lung Kwu Tan operated by an "organised smuggling syndicate" as they were in the act of loading a speedboat.[187] Luxury handbags, valuable watches, expensive food ingredients and nearly 10MT of shark fins were seized.





8. Distinguishing Illegal Trade and Legal Trade

The international trade in CITES-regulated species can be challenging to enforce where there are large volumes or high-value trades of:

- captive bred animals/artificially propagated plants that must be distinguished from animals/plants of wild origin – for which regulation is stricter.
- species where identification is at best challenging and at worst requires DNA analysis. This can be either within species (e.g., wild-captured vs captive-bred parrots), between different species (e.g., fish maws), or where there are look-alike species (e.g., ivory from elephants vs mammoths).

Product	Challenges
Shark fin	• Scale of the legal[188] and illegal[189] trade is large. • Visual identification of CITES-regulated sharks and rays from the hundreds of non-CITES species can be challenging [190], particularly juvenile fins (base fin width 9cm and below). (The Government recognises the challenge and has provided training to frontline officers.[191]) • More robust yet time-intensive methods, including DNA testing, may be necessary to definitively identify species, but authorities are expected to determine the species within half a day.[192]
Elephant ivory	• Scale of the legal and illegal trade has historically been large. • The trade in Hong Kong is now banned but considerable stockpiles remain in the city (50MT as of December 2021). • Distinguishing illegal ivory from antique ivory, mammoth or hippo teeth can be challenging, especially once worked.[193] This presents a particular challenge in the case of mammoth, which may be traded without any restrictions.[194] • More robust methods can require time consuming and expensive DNA analysis and potentially destructive methods, which may damage suspected items.
European eels	• Scale of the legal[195] and illegal[196] trade is large. • Visual identification of European eels, typically imported as juveniles (glass eels, fingerlings or elvers[197]), can be challenging as there are no specific morphological features that can be relied on for identification. They further resemble other, less regulated eel species such as American and Japanese eels[198].
Humphead wrasses	• Scale of the legal and illegal trade is significant.[199] • Possession licensing laws are easy to circumvent.[200] • Visual identification is possible using facial marking identification software.[201] The scalability of an application to conduct such verifications is being investigated by AFCD to assist in regulating the trade.[202] • As Humphead wrasses are typically used in cuisine, microchipping and other tagging methods are not considered suitable.
Orchids	• The scale of the legal and illegal trade is significant.[203] • Visual identification and differentiation between the over 27,700 CITES-listed species is challenging, with relation to distinguishing between wild-sourced and artificially propagated plants and between the Appendix I and Appendix II-listed species.[204]
Red sandalwood	• The scale of the legal[205] and illegal[206] trade is large. • Visual identification may be based on certain recognisable features but timber identification can be challenging.[207]
Live turtles & tortoises	• The scale of the legal[208] and illegal[209] trade is large. • Visual identification is possible for many species but less-regulated species have been used in large consignments to conceal other species.[210] • Further, distinguishing between wild-sourced and captive-bred individuals can be challenging.[211]

9. Legal Framework

9.1 Regulatory Regime

Wildlife crime offences currently fall under the following primary legislation:

- **Cap. 586: The Protection of Endangered Species of Animals and Plants Ordinance (PESAPO)** was enacted in 2006, replacing its predecessor Cap. 187. The principal enforcing agency is the AFCD. Cap. 586 is the primary legislation that gives effect to CITES. The Ordinance and its subsidiary regulations control the import, export and possession of CITES-listed species via a licensing system. Commercial trade in CITES Appendix I species is mostly prohibited.

  Hong Kong has exceeded the mandate of CITES with its Possession Licence (PL) system. The possession of a live captive-bred Appendix I specimen or a live Appendix II specimen of wild origin requires a PL issued in advance by the AFCD (unless it is exempted).[212] A PL is issued to a keeping premises and local authorities conduct regular inspections to ensure compliance. However, concerns have been raised repeatedly about the robustness of the system, which was markedly weakened during the replacement of Cap. 187 with Cap. 586 in 2006.[213]

  The Ordinance was amended in May 2018 to introduce indictable offences and heavier penalties to "*provide a strong deterrent against illicit wildlife trade and to show that the Government is very serious about deterring these crimes.*"[214] Convicted offenders are currently liable to a maximum fine of HK$10 million and imprisonment for ten years. The amendment included a phased ban on the trade in ivory, which was fully realised in December 2021. Currently, only antique ivory can be traded.

- **Cap. 60: The Import and Export Ordinance (IEO)** was enacted in 1970. The principal enforcing agency is the C&ED. Under Article 116 of the Basic Law, Hong Kong is a separate customs territory from Mainland China. Lodgement of import/export declarations for any article, other than an exempted article, is required for goods imported from or exported to Mainland China or another country.

  There is a serious statutory offence of importing or exporting undeclared and/or unmanifested cargo, which *prima facie* would include unmanifested wildlife/wildlife products as they fall within the definition of 'cargo'. This carries a much heavier sentence than the offence of not declaring or misdeclaring. The maximum sentence for unmanifested cargo is a HK$2 million fine and imprisonment for seven years on conviction on indictment. Transhipment and articles in transit are exempt from certain C&ED regulations and legislation.

- **Cap. 455: The Organized and Serious Crimes Ordinance (OSCO)** was enacted in 1994, the principal enforcing agencies are the HKPF and C&ED. Cap. 455 creates powers of investigation into organized crimes and certain other offences and into the proceeds of crime of certain offenders. It provides for the confiscation of proceeds of crime, enhancement of sentencing, and creates offences relating to the proceeds of crime. In August 2021 certain wildlife crime offences were added to Schedule I of Cap. 455 providing for enhanced investigative, prosecutorial and confiscation powers in combatting wildlife crime.[215]

- **Cap. 210: The Theft Ordinance** was enacted in 1970. The principal enforcing agency is the HKPF. Wildlife crime offences can be prosecuted under the Theft Ordinance where the offence involves extraction of wild flora in Hong Kong, e.g., the illegal taking of the highly valuable agarwood.[216] The Ordinance, however, cannot be applied to the poaching of wild fauna locally.

9.2 Anti-Money Laundering (AML) and Wildlife Crime

The Hong Kong Government adopts a multi-agency approach in constructing its AML/counter financing terrorism (CFT) regime. A high-level Central Coordinating Committee on AML/CFT ("CCC"), chaired by the Financial Secretary, steers the formulation of policies and implementation of the AML/CFT regime.

Under s.25 of Cap. 455 any person in Hong Kong is obliged to report suspicious transactions (STR) to an authorised officer, and in practice the authorities require that such reports are made to Joint Financial Investigation Unit (JFIU). Section 25 of Cap. 455 extends the money laundering offence to cover the proceeds of all indictable offences, including the wildlife offences now stipulated in Schedule 1 of the Ordinance.

The Government has indicated that in-depth investigations will be conducted in parallel against each smuggling case should there be suspected ML elements or a large sum of suspected crime proceeds involved.[217]

9.3 UNTOC

The United Nations Convention against Transnational Organized Crime (UNTOC) entered into force in Hong Kong in September 2006.[218] Legislation giving effect to UNTOC's extradition, Mutual Legal Assistance (MLA) and confiscation of proceeds requirements are:

- The Fugitive Offenders (Transnational Organized Crime) Order under section 3 of the Fugitive Offenders Ordinance (Cap. 503)
- The MLA in Criminal Matters (Transnational Organized Crime) Order under section 4 of the Mutual Legal Assistance in Criminal Matters Ordinance (Cap.525) (MLAO)

In May 2022, the UN Commission on Crime Prevention and Criminal Justice (CCPCJ) adopted a resolution on "Strengthening the international legal framework for international cooperation to prevent and combat illicit trafficking in wildlife."[219] This was the first time that a UN resolution has mentioned a potential new global agreement on tackling illicit wildlife trafficking and it further invited Member States to share their "*experiences, good practices and challenges when preventing and combating illicit trafficking in wildlife, and their national legislation in this sphere*."

Advocates have proposed that a fourth protocol under the UNTOC on wildlife should ensure that States Parties agree to adopt legislation establishing as a criminal offence the illicit trafficking of any whole or part of a wild animal or plant, whether alive or dead, in violation of an applicable international agreement or any domestic or foreign law, together with a wide range of other matters.[220] Other commitments would include:

- Increasing the exchange of information, including on known organized groups suspected of taking part in illicit trafficking, means of concealment of illicit goods, and through sharing of forensic samples;
- Verifying the validity of documents;
- Enhancing border controls, including on the means of transporting specimens;
- Training and technical assistance;
- Cooperation between States; and
- Taking measures to discourage demand.

Such a Protocol should also automatically trigger, and enhance the use of, all of the UNTOC's provisions on international cooperation, mutual legal assistance, joint investigations, special investigative techniques such as controlled deliveries, and law enforcement cooperation provisions in tackling the illicit trafficking of wildlife.

10. PROSECUTIONS

10.1 Overview

While Hong Kong authorities made thousands of wildlife crime-related arrests (n=2,621) and successful prosecutions (n=1,280) from 2013 to 2021, defendants observed in the courts appear to mostly comprise mules or couriers. The conviction rates are likely a function of the individuals being caught 'red-handed', i.e., in the act of trafficking wildlife, as many are known to have been apprehended at Hong Kong International Airport with products or live animals on their persons or in their luggage.

- **Carriers/mules:** A review of 231 prosecutions connected to 164 seizures between 2017 and 2019, demonstrated that many of the individuals apprehended were acting on behalf of other parties and were most often Mainland Chinese, breadwinners[221], trafficking wildlife in exchange for payment (cash or a flight) or as a favour to a boss, contact or friend.

- **High volume seizures:** Few prosecutions have been brought in connection with higher-volume seizures of cargo transported by sea, river or air. The only case in the public record relating to sea cargo trafficking of wildlife yielded the sentencing of a part-time salesperson/housewife who served as a proxy for a contact. The defendant alleged that she had allowed the contact to use her address and phone number on a customs declaration for the shipment of 29MT of Honduran rosewood. She was ultimately sentenced to three months in prison. No other parties are known to have faced charges in connection with the shipment.

  Courtroom observations highlight the lack of prosecutions in the highest volume cases (transported by sea, river or air), including the largest seizures of wood (1,005MT in October 2015[222]), ivory (7.2MT in July 2017[223]), pangolin (8.3MT in February 2019[224]) and rhino horn (82.5kg in April 2019[225]).

- **Money laundering:** According to the Financial Services and the Treasury Bureau (FSTB), no ML cases related to IWT led to convictions between 2015 and 2020.[226] Despite wildlife smuggling being a predicate offence since 2018, not one of the 2,817 wildlife trafficking cases from 2015-2020 had any ML charges.

10.2 Penalties and Deterrence

Since the penalty increase and the introduction of indictable offences for breaches of Cap. 586 in 2018, the maximum penalty (as of June 2023) comprised a custodial sentence of 27 months (DING Wei in 2019 for trafficking 50.2kg of pangolin scales[227]) and a fine of HK$300,000 (Glenn Harry Patrick SCHWENDINGER in 2019 for trafficking 97 pink conch pearls[228]).

Whilst the penalties have increased (since 2018) and more recently the suite of powers available to enforcement has grown (since 2021), there is little evidence that prosecutions and sentencing are serving as a deterrent.





11. GOVERNMENT PERCEPTION OF WILDLIFE CRIME

Despite the Government amending Cap. 586 in 2018 to increase the penalties against illegal trade in CITES-regulated species and Cap. 455 in 2021 to include certain wildlife crime offences and recognition that there was a need to strengthen the Administration's enforcement capability in relation to the illegal trade, cases have largely focused on “mules” or “couriers.”[229] In its 2022 Hong Kong Money Laundering and Terrorist Financing Risk Assessment Report [230] the FSTB acknowledged emerging regional threats such as human smuggling/trafficking and IWT.

The FSTB indicated that in response to the escalating global ML threat of IWT, as discerned by the FATF, the C&ED will continue to work closely with the AFCD and international parties to monitor such illegal activities and collaborate with the banking sector on suspicious bank transactions relating to IWT-related ML activities.[231] Further, it stated that “*many fraudulent shipments involving endangered species were imported to Hong Kong solely for the purpose of being transshipped to other places*” and that the majority of those arrested were ‘*mules*’ or couriers.[232] The FSTB stated that wildlife offences posed “*a low level of ML threat*” within Hong Kong. This contrasts with the Security Bureau’s view that "*criminal syndicates*” have been facilitating large cargo shipments of endangered species.[233]

The Financial Action Task Force (FATF) completed an assessment of the implementation of anti-money laundering and counter-terrorist financing (AML/CFT) standards in Hong Kong in 2019.[234] It acknowledged that wildlife trafficking was an “emerging threat” across the region but that environmental crimes in general were not covered “adequately.” In subsequent reports, cases involving Hong Kong-linked individuals and entities have been used as exemplars of how front companies have been used as well as attempts to tackle the illegal trade through sanctions.[235] As of August 2021, the amendment of Cap. 455 has provided some remedy to this. However, the first case to trigger Cap. 455 in connection with a wildlife trafficking offence under Cap. 586 took place in January 2024.[236]



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Type	Entry and Exit Points
Foot, Train & Land Vehicle	Lo Wu, Hung Hom, Lok Ma Chau, Lok Ma Chau Spur Line, Man Kam To, Sha Tau Kok, Shenzhen Bay, Express Rail Link West Kowloon, Hong Kong Zhuhai-Macao Bridge & Heung Yuen Wai
Airport	Hong Kong International Airport
Sea cargo container terminal	Kwai Tsing Container Terminals & Tsing Yi floating docks
River cargo	River Trade Terminal (Tuen Mun)
Public Cargo Working Areas	Western District PCWA, Chai Wan PCWA, New Yau Ma Tei PCWA, Stonecutters Island PCWA, Rambler Channel PCWA & Tuen Mun PCWA
Ferry & Cruise Liner	China Ferry Terminal, Macau Ferry Terminal, Tuen Mun Ferry Terminal & Kai Tak Cruise Terminal

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