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THE ILLEGAL WILDLIFE TRADE AND CHINESE
BANKS OPERATING IN LAO PEOPLE'S
DEMOCRATIC REPUBLIC: THE NEED FOR A

ZERO TOLERANCE APPROACH

TRAFFIC REPORT

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ACRONYMS

| | |
|--------------|---|
| ACAMS | Association of Certified Anti-Money Laundering Specialists |
| AML | Anti-money laundering |
| AMLIO | Anti-Money Laundering Intelligence Office |
| BMU | German Federal Ministry for Environment, Nature Conservation and Nuclear Safety |
| BMZ | German Federal Ministry for Economic Cooperation and Development |
| CEO | Chief Executive Officer |
| CDD | Customer due diligence |
| CFT | Counter-financing of terrorism |
| CITES | Convention on International Trade in Endangered Species of Wild Fauna and Flora |
| EIA | Environmental Investigation Agency |
| FATF | Financial Action Task Force |
| FIU | Financial Intelligence Unit |
| GIZ | Germany's federal agency for development cooperation |
| IPBES | Intergovernmental Panel on Biodiversity and Ecosystem Services |
| IWT | Illegal Wildlife Trade |
| KYB | Know Your Business |
| KYC | Know Your Customer |
| NGO | Non-governmental organisation |
| PDR | People's Democratic Republic |
| PEP | Politically Exposed Person |
| RUSI | Royal United Services Institute |
| STR | Suspicious Transaction Report |
| UFWFT | United for Wildlife Financial Taskforce |
| UNEP | United Nations Environment Programme |
| UNODC | United Nations Office on Drugs and Crime |
| USAID | US Agency for International Development |
| WWF | World Wide Fund for Nature |

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ACKNOWLEDGMENTS

These Guidelines have been prepared to provide practical guidance to Chinese banks operating in Lao People's Democratic Republic (Lao PDR) on the systems and processes that they need to have in place to manage the business risks associated with the illegal wildlife trade and thereby play a key role in combatting that trade.

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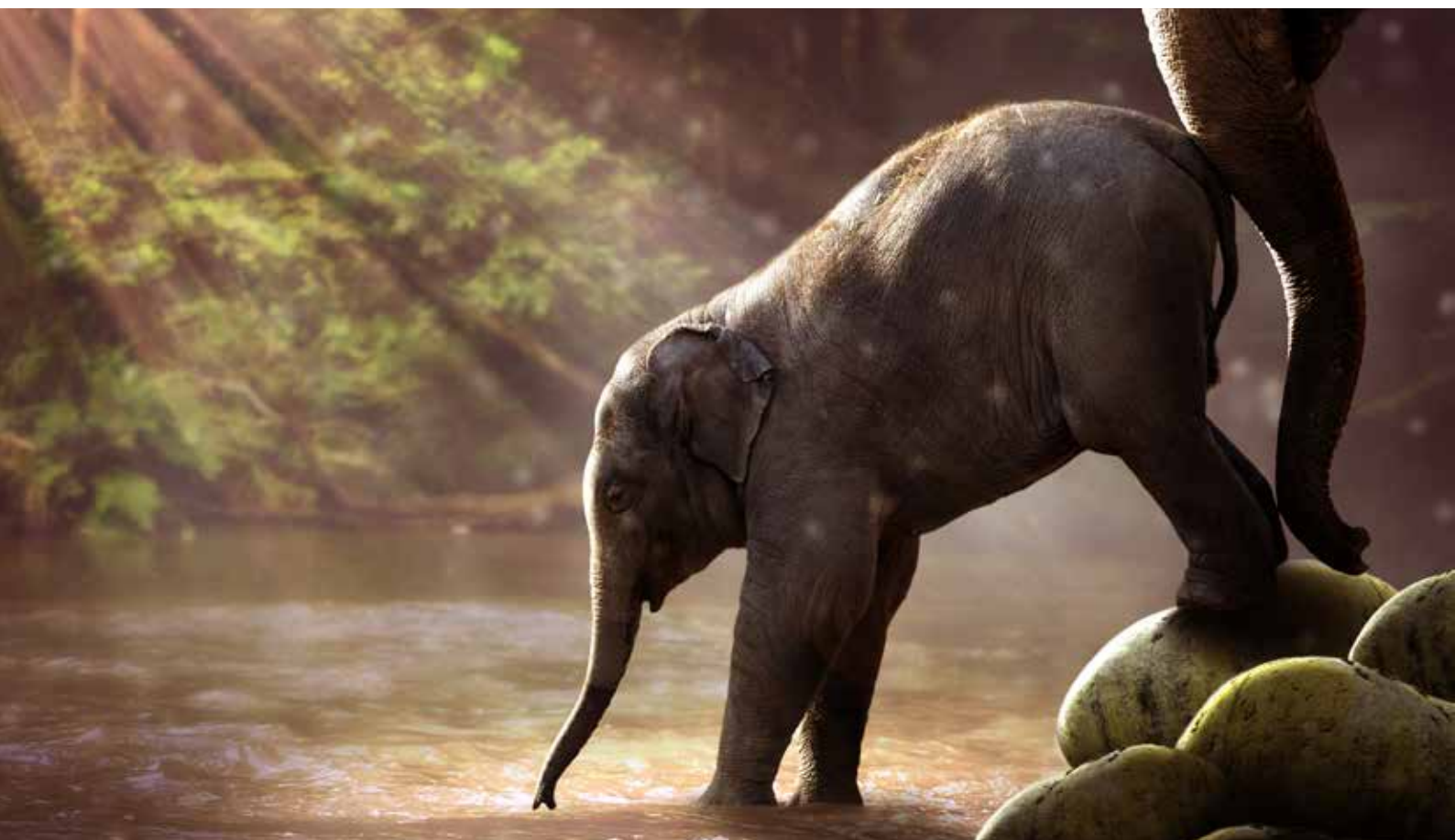
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SUMMARY

SUMMARY

The illegal trade in wildlife and wildlife parts and products globally is estimated to be worth billions of US dollars annually, ranking alongside the illegal trafficking of narcotics, arms, and humans (TRAFFIC, 2020a; United Nations Office on Drugs and Crime (UNODC), 2014). Illegal wildlife trade cannot occur at this scale without financial crime and corruption.

Given that the Chinese banking sector is the largest in the world and given the scale of the illegal wildlife trade in Asia, Chinese banks have a key role to play in combatting the illegal wildlife trade. They need to ensure that the banking and financial sectors are not used to launder the proceeds of the illegal wildlife trade. They must take strong public zero-tolerance positions on the illegal wildlife trade, and they should encourage their clients and business partners to take similar positions. They should support law enforcement efforts through providing data and information on suspicious transactions.

The case for Chinese banks to take action now is clear. The Chinese government is strengthening its efforts to combat money laundering and corruption in general, and the illegal wildlife trade in particular. As Chinese banks seek to expand domestically and internationally, their systems and processes for preventing money laundering and other illegal activities are coming under increased scrutiny from regulators and from civil society organisations.

This document provides practical guidance to Chinese banks with operations and investments in Lao PDR on the systems and processes they need to have in place to manage the risks associated with the illegal wildlife trade. **It advises that banks should integrate commitments to zero-tolerance of the illegal wildlife trade into their systems and processes for managing anti-money laundering and corruption, and into their corporate social responsibility strategies.**

BANKS SHOULD TAKE ACTION IN FIVE AREAS:

1. **Make a formal, public commitment** to zero tolerance of the illegal wildlife trade. This commitment should apply to the bank itself (including all its subsidiaries, branches, representative offices and legal entities) and to all individuals and organisations with which it has a business relationship, including clients and suppliers.
 - Adopting clear procedures for monitoring their exposure, or potential exposure, to the illegal wildlife trade.
 - Communicating their zero tolerance commitments to all of their clients and business partners.
 - Identifying and assessing the risks posed to their organisation from the illegal wildlife trade.
2. **Establish the systems and processes** necessary to deliver these zero tolerance commitments. These include:
 - Assigning responsibility for the oversight of the policy to the board or Chief Executive Officer (CEO).
 - Assigning responsibility for the day-to-day implementation of the commitments to the individual responsible for overseeing the bank's internal control system for anti-money laundering,
 - Ensuring that their staff are adequately trained to implement the bank's zero tolerance commitments.
3. **Ensure that their Know Your Customer (KYC) and Know Your Business (KYB) processes** pay attention to the potential for customers and businesses to be involved in the illegal wildlife trade.
4. **Report publicly on a regular basis** (e.g. annually) how they have implemented their zero tolerance commitments.
5. **Collaborate with other banks and with other stakeholders** to build capacity and understanding of the illegal wildlife trade within the banking and finance sectors.



UNDERSTANDING THE ILLEGAL WILDLIFE TRADE

A. Walmsley/TRAFFIC

UNDERSTANDING THE ILLEGAL WILDLIFE TRADE

The consequences of the illegal wildlife trade are devastating. The Intergovernmental Panel on Biodiversity and Ecosystem Services 2019 Assessment identified that a million species are at risk of extinction and that the second most significant driver of biodiversity loss is 'direct exploitation' (IPBES, 2019). Some examples are summarised in Appendix 3 of this report. Furthermore, the wider impacts of the illegal wildlife trade on ecosystems and biodiversity are eroding the foundations of economies, livelihoods, food security, health and quality of life in all regions of the world.

These impacts have direct implications for human health. The SARS coronavirus 2 outbreak (SARS-CoV-2, which causes COVID-19) has drawn attention to the growing number of human health concerns and emerging infectious diseases that have been linked to wildlife sources. Although the precise origins of COVID-19 are currently unproven, there are indications of direct links to the wildlife trade.

The definition of the illegal wildlife trade used in this report is: trade in wildlife or wildlife parts – flora and fauna – that violates either international legal frameworks or the legislation of one or several of the countries/territories through which a wildlife product has passed. This definition encompasses both domestic laws and the regulations of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (see Box 1).

60%

of emerging infectious diseases are zoonotic¹ in nature, and more than

70%

of these have an origin in wildlife (Watsa, 2020).

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

CITES is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.³

CITES works by subjecting international trade in specimens of selected species to certain controls. All import, export, re-export and introduction of the species covered by the Convention has to be authorised through a licensing system. The species covered by CITES are listed in three Appendices, according to the degree of protection they need:

- Appendix I includes species threatened with extinction. International commercial trade of these species is forbidden other than in exceptional circumstances.
- Appendix II includes species not necessarily threatened with extinction, but in which trade must be controlled to ensure long term sustainability. Annual quotas are applied and official CITES import and (re)export permits are needed in order to avoid over-utilisation which will threaten their survival.
- Appendix III includes species that are protected in at least one country which has asked other CITES Parties for assistance in controlling the trade.

¹ That is, they are diseases that can be transmitted from animals to people or, more specifically, they are diseases that normally exists in animals but that can infect humans.

THE CHANGING REGULATORY LANDSCAPE IN LAO PDR

The Lao PDR Wildlife and Aquatic Law 2007 divides wildlife species into three categories:

- Species considered to be at risk of extinction and of high value (Prohibition Category 1). The use of these species is prohibited without permission.
- Species considered to be of national economic, social and environmental interest and important to livelihoods (Management Category 2). The use of these species is controlled.
- Species that can reproduce widely in nature and that are considered to be important for socio-economic development (Category 3). The use of these species is permitted provided such use does not adversely affect populations in the wild.

In recent decades, the Lao PDR government has strengthened its wildlife-related policy, regulatory and law enforcement frameworks in two main areas²: First, it revised the Penal Law in 2018, broadening and increasing the penalties associated with the breach of wildlife regulations. The changes included provisions targeting transnational and organised criminal networks and the individuals who support them. Individuals found guilty of breaking the Wildlife and Aquatic Law can now be imprisoned for periods between 3 months and 5 years.

Second, in 2018, Prime Minister Order No. 05 on Strengthening Strictness of the Management and Inspection of Prohibited Wild Fauna and Flora introduced measures to tighten the implementation of forest plant and wildlife protection, and to ensure Laos complies with its obligations under CITES. Among other elements, the Order:

- Instructs authorities to stop the hunting of all wild animals and to prevent the import, transit, export, and trade of all wildlife body parts.
- Prohibits the establishment of new wildlife farms and recommends turning existing farms into safari parks or zoos for conservation, tourism, or scientific purposes.
- Requires the Ministry of Agriculture and Forestry to work with other Ministries to register wildlife and wildlife products owned by individuals and organisations. Illegal wildlife products confiscated by authorities should be handed over to forestry officers to take the lead in investigation and prosecution. After sentencing by a court, all products will be destroyed or kept for scientific research purposes, for example: ivory, bones and rhino horns.
- Instructs officials to strictly inspect and patrol along vulnerable areas, at points of arrival and departure, and in special economic zones and other areas.



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² A more detailed account, including a discussion of the strengths and weaknesses of Lao PDR wildlife regulation is provided in TRAFFIC (2020b).

³ For further information, see <https://www.cites.org/eng>

THE ILLEGAL WILDLIFE TRADE AND THE FINANCE SECTOR

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THE ILLEGAL WILDLIFE TRADE AND THE FINANCE SECTOR

The illegal wildlife trade is a major transnational organised crime, which generates billions of dollars in criminal proceeds each year (FATF, 2020).

Illegal wildlife trade cannot occur at the scale being seen today without financial crime and corruption. A 2018 Interpol report states that the criminal kingpins involved in the illegal wildlife trade are often involved in tax evasion, fraud, document falsification, money-laundering and firearms trafficking, and that illegal wildlife trade trafficking pipelines are commonly used to smuggle other illicit commodities, such as drugs and weapons (Interpol, 2018). Much of the profit is laundered via legitimate banking channels and online payment platforms.

Given that the illegal wildlife trade shares so many features in common with terrorism financing and drug, human, and weapons trafficking, it is increasingly accepted that it should be fought using the same resources and strategies that are applied to these other illegal activities (see, for example, United Nations Office on Drugs and Crime and Asia/Pacific Group on Money Laundering (2017)). These arguments were given further impetus by the release in 2020 of the Financial Action Task Force's (FATF) report *Money Laundering and the Illegal Wildlife Trade* (see Box 2).

Expectations of the banking sector and the illegal wildlife trade have yet to be fully codified in Lao PDR. We have therefore defined our expectations by building on and consolidating the work of leading international organisations in this area – in particular the Financial Action Task Force (see page xx) and the United for Wildlife Mansion House Declaration (see page xx).

Globally, the proceeds of the illegal wildlife trade (excluding fisheries and timber) have been estimated at between

**US\$ 7 and
US\$ 23 billion
PER YEAR**

(UNEP-Interpol, 2014; World Bank, 2019)



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THE FINANCIAL ACTION TASK FORCE REPORT MONEY LAUNDERING AND THE ILLEGAL WILDLIFE TRADE

The Financial Action Task Force (FATF) is an independent inter-governmental body that develops and promotes policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global anti-money laundering (AML) standard.

In June 2020, FATF published its first global report on money laundering and the illegal wildlife trade (FATF, 2020). The FATF report shows that the illegal wildlife trade is a global threat, not just a problem for those jurisdictions where wildlife is illegally harvested, transited or sold. It shows that criminals are misusing legal wildlife trade and import-export type businesses as fronts to move and hide illegal proceeds from illegal wildlife trade.

The report identifies the common methods wildlife traffickers use to launder their money, including using shell and front companies to hide payments and using online marketplaces and mobile and social media-based payment systems to

facilitate the movement of proceeds from wildlife crimes. It argues that following the financial flows associated with the illegal wildlife trade and identifying money-laundering will allow countries to identify wider networks of syndicate leaders and financiers, to reduce the profitability of this crime over the longer term, and to help prevent and tackle associated crimes such as corruption and complex fraud.

The FATF report highlights the important role that financial institutions can play in detecting and reporting suspicious activity, and in supporting law enforcement efforts. For example, the report notes that criminals can incorporate shell and front companies in both source and destination countries to facilitate illicit wildlife trade and can also take advantage of the weak regulatory environments in some financial and incorporation centres to set up complex company structures. This suggests that trade data, and information on company business activities and tax reporting, are important sources to identify anomalies and suspicious behaviour indicative of wildlife crime.



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FOCUS ON THE LAO PDR BANKING SECTOR

[bckfwd/unsplash.com](https://bckfwd.unsplash.com)

FOCUS ON THE LAO PDR BANKING SECTOR

THE ANTI-MONEY LAUNDERING AND ANTI-CORRUPTION REGULATORY FRAMEWORK IN LAO PDR

A report by the Basel Institute on Governance in 2019 notes that Lao PDR faces a high risk of money laundering. There are various reasons: limited law enforcement capabilities, being a cash-driven economy, the existence of widespread corruption, drug and human trafficking, and environmental crimes (Basel Institute on Governance, 2019).

Enhancing financial transparency, addressing money laundering, and preventing crime have become important priorities for the government of Lao PDR. Most significantly, in 2015, the Law on Anti-Money Laundering and Counter-Financing of Terrorism established a comprehensive regulatory framework on money laundering.

The legislation imposes specific duties on individuals and organisations in relation to knowing their customers, taking action to eliminate money laundering, and supporting regulatory agencies by reporting suspicious transactions. The legislation identifies the causes of money laundering as including bribery, environmental crime, and the violation of customs and tax regulations. It imposes specific obligations on financial institutions (which include commercial banks, money transfer service companies, currency exchange shops, insurance companies, securities companies and asset management companies), including developing and implementing effective risk management systems, and gathering and reporting information on suspicious transactions (see Appendix1).



THE BUSINESS CASE FOR CHINESE BANKS WITH OPERATIONS IN LAO PDR TO ACT ON THE ILLEGAL WILDLIFE TRADE

Banks play a critical role in the Lao PDR economy, as a source of capital to companies and other organisations, as well as in terms of more traditional savings. As such, they are highly likely to be exposed to the illegal wildlife trade.

The case for Chinese banks to pay attention to the illegal wildlife trade is clear. Not only are Chinese banks exposed but the illegal wildlife trade is a priority for the Chinese government and international authorities concerned about money laundering and corruption, and taking action is increasingly seen as an integral part of the regulatory obligations on banks.

For Chinese banks operating in Lao PDR, ensuring that their anti-money laundering and anti-corruption systems meet the expectations of regulatory authorities in the jurisdictions in which they operate is essential. These systems and processes are particularly important given that Chinese companies may not have the local knowledge and information necessary for them to fully assess the risks associated with their clients, partners, and their third-party suppliers. The issues identified above about the implementation of money-laundering and anti-corruption legislation in China, suggest that many have work to do to ensure their systems and processes, and the implementation of these, meet the standards of international regulatory authorities.

There are strong commercial reasons for Chinese banks operating in Lao PDR to take action on the illegal wildlife trade:

- **Corporate Responsibility**

It is a central part of banks' wider corporate responsibilities and sustainable development commitments. Many banks now support the United for Wildlife Financial Taskforce (see pages xx and xx) demonstrating that combatting the illegal wildlife trade is an important issue for them, and that clear strategies and actions are required.

- **Risk management**

Taking action mitigates a range of financial risks. For example, it helps avoid engagement with companies which are active in the illegal wildlife trade and money laundering, and it helps clients avoid high risk investments including wildlife products.

- **Transparency**

Increased transparency helps improve standards across the industry.

- **Reputation**

Being perceived to tackle the illegal wildlife trade helps the industry to improve its reputation among law enforcement agencies, regulators, clients, peers and consumers.










RECOMMENDATIONS TO CHINESE BANKS OPERATING IN LAOS PDR

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RECOMMENDATIONS TO CHINESE BANKS OPERATING IN LAOS PDR

Banks should integrate their commitments to zero tolerance of the illegal wildlife trade into their existing systems and processes. This will ensure that the actions they take are consistent with their wider approaches to sustainable finance and to anti-money laundering and corruption and will enable them to accelerate the implementation of their commitments.

BANKS SHOULD TAKE ACTION IN FIVE AREAS:

- 1 Make a formal, public commitment to zero tolerance of the illegal wildlife trade (see page xx) 
- 2 Establish the systems and processes necessary to deliver these commitments (see page xx) 
- 3 Ensure that their Know Your customer (KYC) and Know Your Business (KYB) processes pay attention to the potential for customers and businesses to be involved in the illegal wildlife trade (see page xx) 
- 4 Report publicly on a regular basis (e.g. annually) on how they have implemented their zero tolerance commitments, and their performance against these commitments (see page xx) 
- 5 Collaborate with other banks and with other stakeholders to build capacity and understanding of the illegal wildlife trade within the banking and finance sectors (see page xx) 

1. OVERARCHING COMMITMENT AND POLICY: ZERO TOLERANCE OF THE ILLEGAL WILDLIFE TRADE

Banks should make a formal commitment to zero tolerance of the illegal wildlife trade. This should be captured in a formal policy or similar document. This policy should also set out the actions (e.g. systems and processes, allocating responsibilities, sharing information) that the bank will implement to ensure that this zero tolerance commitment is delivered.

The scope of the policy should include the bank itself (including all of its subsidiaries, branches, representative offices and legal entities) and any individual or organisation with which it has a business relationship, including clients and suppliers.

The commitments made by the United for Wildlife Financial Taskforce (below) provide a good starting point for the content of such a policy, and can be adapted by individual organisations.



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EXTRACTS FROM THE UNITED FOR WILDLIFE FINANCIAL TASKFORCE SIGNATORY STATEMENT (UNITED FOR WILDLIFE, 2018), THE MANSION HOUSE DECLARATION

We, signatories to the Declaration of the United for Wildlife Financial Taskforce, recognise the devastating impact of the illegal wildlife trade (IWT) and will not knowingly facilitate or tolerate financial flows that are derived from IWT and associated corruption.

COMMITMENTS

1. Take measures to increase awareness of IWT and the role of the financial industry in combatting it.
2. Provide training to relevant staff within financial crime compliance functions to enhance their ability to identify and investigate potentially suspicious activity that may be related to IWT.
3. Utilise current suspicious activity reporting mechanisms to provide intelligence related to potential IWT activity to the relevant regulatory body or law enforcement agency, where permitted by law.
4. Review intelligence alerts received through the Taskforce and where relevant take appropriate action including due diligence screening and steps to identify, investigate and report potentially suspicious financial activity related to IWT.
5. Consider additional actions, examples include policy amendments that would support the aims of the Taskforce in addition to financial crime related mechanisms.
6. Support the work of the Taskforce, promote the Declaration and where possible support external mechanisms that enhance the ability of the financial industry to identify potentially suspicious activity related to IWT.

2. SYSTEMS AND PROCESSES

Banks should ensure that they have the systems and processes they need to effectively implement their policy commitment to zero tolerance of the illegal wildlife trade. They should integrate these into their anti-money laundering and anti-corruption processes.

2.1 RESPONSIBILITIES

Banks should assign responsibilities for the oversight of the policy. Generally, this responsibility should sit with the board and/or the CEO, who will ensure that the policy is effectively implemented across the organisation.

The bank should also assign responsibilities for the day-to-day implementation of the zero tolerance commitments. This responsibility should be given to the individuals responsible for overseeing the bank's internal control system for anti-money laundering, who are also likely to have responsibility for collecting and analysing information (e.g. suspicious transaction reports) and the policy should be integrated within the bank's anti-money laundering and anti-corruption processes. This responsibility may be shared with the head of sustainability or equivalent, if such a role exists within the bank.

2.2 TRAINING

Banks should ensure that their staff are adequately trained to implement the bank's zero tolerance commitments. Under Article 19 of the Law on Anti-Money Laundering and Counter-Financing of Terrorism (see Appendix 1), banks operating in Lao PDR are already required to conduct training about anti-money laundering and to explain employees' anti-money laundering responsibilities. While not explicitly referenced in the legislation, the provisions clearly apply to all forms of money laundering, irrespective of the sources or destination of this money.

These training requirements, which would normally be expected to be repeated or refreshed annually, should be extended to include training on the illegal wildlife trade and on the bank's systems and processes for detecting illegal wildlife trade.

TRAINING COURSES

TRAFFIC has supported the development of the FIU CONNECT (Wildlife Trafficking) training programme⁴ developed by ManchesterCF, in collaboration with The Royal Foundation and the United for Wildlife Financial Taskforce. ManchesterCF has assembled detailed case-studies, examples and red flags to advise course participants on suspicious financial patterns that may indicate the illegal trade of wildlife. The training programme is available to the banks that are members of the United for Wildlife Initiative.

The Association of Certified Anti-Money Laundering Specialists (ACAMS) and The World Wide Fund for Nature (WWF) have developed a free training certificate for individuals seeking to protect their organisations from the threats of illicit finance linked to illegal wildlife trade.⁵

Following the completion of the course, participants should:

- Understand the illegal wildlife trade and its consequences.
- Understand the financial elements of how wildlife crime manifests.
- Be able to identify organisational risks and exposure to illegal wildlife trade.
- Understand how to report suspicious activity associated with the illegal wildlife trade.

2.3 INTERNAL CONTROLS

Banks should adopt clear procedures for monitoring their exposure, or potential exposure, to the illegal wildlife trade. Know Your Customer requirements are discussed below. Another important element is the monitoring of large and suspicious transactions, and the reporting of these to the Anti-Money Laundering Intelligence Office (AMLIO) in a timely manner (as required by Article 30 of the Law on Anti-Money Laundering and Counter-Financing of Terrorism (see Appendix 1 of this report).


FATF (2020) states that banks should take steps to detect and report suspicious behaviour and/or transactions relating to the illegal wildlife trade to the country's financial intelligence unit (AMLIO in the case of Lao PDR). These reports, known as suspicious transaction reports (STRs), may provide operational intelligence, trigger investigations or support ongoing criminal investigations into wildlife crime.

2.4 IMPLEMENTATION POLICIES

Banks should communicate their zero tolerance of the illegal wildlife trade commitment to all of their clients and business partners. They can do this by publishing details of their commitment on their websites, by proactively emailing or writing to their clients and business partners, and by explicitly referencing the commitments in formal documentation such as contracts and loan agreements.

In these communications, banks should explain how they intend to implement their commitment, both in terms of the decisions they will take if they discover a client or business partner has had involvement with the illegal wildlife trade, and in terms of their intention to notify the relevant regulatory authorities of suspicious transactions. Banks should also encourage these clients and partners to make similar commitments in their business dealings with others.

2.5 RISK ASSESSMENT PROCESSES

Banks have taken a range of measures to identify and assess the risk posed to their organisation from the illegal wildlife trade (FATF, 2020: page 50). These may include incorporating specific risk indicators into financial crime risk assessments and developing tracking models to proactively collect and screen intelligence gathered from law enforcement, open-source reporting and other partners in order to understand the current threat environment. **Appendix 2 provides a list of risk indicators that can be used by banks to identify potentially suspicious transactions.** The business sectors which are considered to be particularly impacted by or exposed to the illegal wildlife trade are identified below. 

⁴ <https://www.manchestercof.com/wildlife-trafficking-2/>

⁵ <https://www.acams.org/en/training/certificates/ending-illegal-wildlife-trade#overview-35d65314>

BUSINESS SECTORS IMPACTED BY OR EXPOSED TO THE ILLEGAL WILDLIFE TRADE

- Transport and logistics (e.g. freight and courier companies, sea transport, air transport)
- Travel and tourism
- Online platforms including E-commerce, social media and messaging apps
- Traditional Chinese Medicine
- Timber and forestry
- Pet shops and zoos (e.g. pet shops, breeding facilities, zoos)
- Crafts and collection
- Restaurants

3. KNOW YOUR CUSTOMER AND KNOW YOUR BUSINESS

Know Your Customer (KYC) and Know Your Business (KYB) processes involve identifying and verifying the identity of clients when they open an account and periodically over time. These processes play a central role in helping to prevent and identify money laundering, terrorism financing, and other illegal corruption schemes. **The Law on Anti-Money Laundering and Counter-Financing of Terrorism (see Appendix 1) requires banks to establish KYC processes.** Banks are required to verify their clients' identities, identify all parties to business transactions, keep records of clients' identities and transactions, and ensure that this information is kept up to date.

Know Your Business (KYB) requirements extend KYC requirements to verify the corporate information of the companies' potential customers and the personal information of the managers of that customer company.

KYC and KYB processes are critical elements in ensuring that banks adequately track the risks associated with the illegal wildlife trade. As discussed in Section 2, the use of shell companies and intermediaries means that banks cannot limit their focus to their direct customers. In that context, banks should also obtain information on the purpose and intended nature of the business relationship and on the source/origin of funds.

USEFUL RESOURCES

TRAFFIC Reports relating to the illegal wildlife trade can be downloaded from www.traffic.org. See in particular Schweikhard et al. (2019) and Traffic (2020b, pages 58-61).


Some examples of relevant information for banks to consider include intelligence on domestic illegal wildlife markets, and volumes of illegal wildlife identified and seized domestically (FATF, 2020). Banks can also look at trade relationships with countries that are deemed high-risk for wildlife crimes, corruption levels (especially amongst port, border, mail, and customs authorities), and/or legislative gaps related to wildlife crimes and related money laundering (FATF, 2020).

4. REPORTING

Banks should publicly report – on their websites and in their sustainability and/or annual reports – on the progress they are making in implementing their zero tolerance commitments. Specifically, they should report on:

- Their commitments.
- The actions they have taken to implement these commitments (e.g. the number of staff receiving training, improvements to their systems and processes).
- The number of cases/situations where they identified suspicious transactions or other indications that clients or business partners were involved in the illegal wildlife trade.
- The actions they took in these cases.

5. COLLABORATION WITH OTHERS

The emphasis on the illegal wildlife trade in discussions around anti-money laundering is a relatively recent phenomenon. Banks, therefore, need to work together with other banks, and with other stakeholders (e.g. payment platforms such as Alipay and WeChat Pay) to build capacity and understanding of the issue. The United for Wildlife Financial Taskforce (see pages xx and xx ) is an example of the sort of multi-stakeholder initiative that enables the banking sector to work together on the illegal wildlife trade.

UNITED FOR WILDLIFE⁶

United for Wildlife works to tackle illegal wildlife trade by bringing together conservation organisations, governments, and global corporations. Led by HRH The Duke of Cambridge and The Royal Foundation, United for Wildlife works to protect endangered species like elephants, rhinos, tigers and pangolins.

United for Wildlife has recognised that there is a need to engage with financial institutions in order to effectively respond to illegal wildlife trade. These institutions can help both through using their infrastructure to detect potentially suspicious financial activity related to the illegal wildlife trade, and through providing financial intelligence to support law enforcement efforts to pursue the trade's greatest beneficiaries.

United for Wildlife has supported the establishment of a bank-led Illegal Wildlife Trade Financial Taskforce. Supported by technical experts including the Royal United Services Institute (RUSI) and TRAFFIC, along with a Secretariat, the Taskforce has been working to identify specific actions that the financial sector can take on this issue. In 2018, 38 banks, law firms, government bodies and other organisations – including Credit Suisse, Standard Chartered, HSBC, ANZ, Commercial Bank of Africa, ABSA and Citigroup, as well as technical experts such as TRAFFIC, the UN Office on Drugs and Crime (UNODC) and the Environmental Investigation Agency (EIA) – signed the Mansion House Declaration (see Box 3), promising not to “knowingly facilitate or tolerate financial flows that are derived from the illegal wildlife trade

and associated corruption”. The Declaration sets out six commitments, including the dedication to share resources and intelligence in a bid to disrupt the illegal income generated by poached animal products such as elephant tusks, rhino horn and pangolin scales.

Work to support the efforts of the Taskforce members has achieved considerable success since the launch of the Taskforce and connections between law enforcement and the private sector continue to strengthen. The United for Wildlife Taskforce Information Sharing System, now implemented through the Basel Institute on Governance with support from the Secretariat, underpins much of this action.⁷

Since 2019, the United for Wildlife Financial Taskforce has convened financial workshops in various key regions to raise awareness of the illegal wildlife trade as a financial crime and the role that financial institutions and financial investigators can play in detecting, disrupting and preventing IWT activity. These workshops, where public, private, and civil society technical experts share common challenges and good practices, include local and regional government authorities, members of the FATF IWT Working Group and NGOs (FATF, 2020).

The United for Wildlife Financial Taskforce members have supported investigations in their home markets, including through the submission of IWT-related suspicious activity reporting (FATF, 2020).

⁶ See further <https://unitedforwildlife.org/projects/financial-taskforce/>

⁷ See <https://baselgovernance.org/b20-collective-action-hub/initiatives-database/united-wildlife-financial-taskforce>



KEY CONCLUSIONS

TRAFFIC / F.Noor

KEY CONCLUSIONS

The case for Chinese banks operating in Lao PDR to be concerned about and to act on the illegal wildlife trade is clear. This report explains why these banks should integrate commitments to zero tolerance of the illegal wildlife trade into their systems and processes for managing anti-money laundering and corruption, and into their corporate social responsibility strategies. It also provides practical guidance to Chinese banks on the systems and processes they need

to have in place to manage the business risks associated with the illegal wildlife trade, and on the role that they can play in combatting the illegal wildlife trade. **The report's recommendations on the key systems and processes that all Chinese banks operating in Lao PDR should adopt to ensure that they play their role in combatting the illegal wildlife trade are presented in the box below.**

EXPECTATIONS OF CHINESE BANKS WITH OPERATIONS IN LAO PDR ON THE ILLEGAL WILDLIFE TRADE

1. Banks should make a formal, public commitment to zero tolerance of the illegal wildlife trade. This commitment should apply to the bank itself (including all its subsidiaries, branches, representative offices and legal entities) and to all individuals and organisations with which it has a business relationship, including clients and suppliers.
 - Adopting clear procedures for monitoring their exposure, or potential exposure, to the illegal wildlife trade.
 - Communicating their zero tolerance commitments to all of their clients and business partners.
 - Identifying and assessing the risks posed to their organisation from the illegal wildlife trade.
2. Banks should establish the systems and processes necessary to deliver these zero tolerance commitments. These include:
 - Assigning responsibility for the oversight of the policy to the board or CEO.
 - Assigning responsibility for the day-to-day implementation of the commitments to the individual responsible for overseeing the bank's internal control system for anti-money laundering.
 - Ensuring that their staff are adequately trained to implement the bank's zero tolerance commitments.
3. Banks should ensure that their Know Your Customer (KYC) and Know Your Business (KYB) processes pay attention to the potential for customers and businesses to be involved in the illegal wildlife trade.
4. Banks should report publicly on a regular basis (e.g. annually) how they have implemented their zero tolerance commitments.
5. Banks should collaborate with other banks and with other stakeholders to build capacity and understanding of the illegal wildlife trade within the banking and finance sectors.

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Chris Shepherd/TRAFFIC

APPENDIX 1

THE LAW ON ANTI-MONEY LAUNDERING AND COUNTER-FINANCING OF TERRORISM (2015) (EXTRACTS)

Source: Adapted from <http://amllo.gov.la/eng/files/regulation/Law%20on%20AML-CFT%2050.pdf> (unofficial translation)

ARTICLE 1: OBJECTIVE

This law establishes the principles, regulations and measures relating to the management and monitoring of anti-money laundering and counter-financing of terrorism (hereinafter called “AML/CFT”) with the aim of combatting, preventing, curbing and eliminating such offences, creating a strong and sound economic and financial system and a harmonious and orderly society, facilitating regional and international integration, and contributing to national socio-economic development.

ARTICLE 4: ANTI-MONEY LAUNDERING

Anti-money laundering actions can be carried out by natural persons, legal persons and organisations with direct duties to know your customers or with duties to combat, prevent, curb, and eliminate money laundering as defined in Article 2 of this law, in which the offence is a threat to the national security, or causes damages to the national socio-economic foundation.

ARTICLE 8 DEFINITIONS

The terminology used in this law have the following meaning:

1. **Predicate offences** shall mean all criminal offences which are the causes of money laundering including ... corruption including taking and giving bribes, ...environmental crime... violation of customs and tax regulations...
7. **Financial institutions** shall mean commercial banks, micro-finance institutes, all forms of credit lending companies, pawnshops, leasing companies, money transfer service companies, currency exchange shops, insurance companies, securities companies, asset management companies, among others.

ARTICLE 18: RIGHTS AND OBLIGATIONS OF REPORTING ENTITIES

The reporting entities have the following rights and obligations:

1. Developing an AML/CFT [money laundering and counter-financing of terrorism] programme;
2. Implementing risk assessment and risk-based management principles;
3. Implementing Know Your Customer measures;
4. Enhancing Customer Due Diligence measures;
5. Gathering detailed information on customers;

6. Gathering information about customers’ transactions;
7. Dealing with Politically Exposed Persons (PEPs);
8. Dealing with corresponding banks;
9. Collecting data on wire transfer;
10. Maintaining records;
11. Postponing transactions;
12. Reporting;
13. Reporting suspicious transactions;
14. Maintaining reporting confidentiality.

Overseas branches and subsidiaries in the group of the reporting entities are obliged to observe Articles 19 to 32 of this law. In case the laws of the country where the branches or subsidiaries of the group of the reporting entities are located do not allow the application of these obligations, the reporting entities shall notify their supervisory authorities.

ARTICLE 19: AML/CFT [MONEY LAUNDERING AND COUNTER-FINANCING OF TERRORISM] PROGRAMME DEVELOPMENT

The reporting entities must develop and implement AML/CFT programmes as follows:

1. Developing AML/CFT policies and procedures, and internally auditing the qualified staff selection procedure;
2. Developing AML/CFT training programmes, and undertaking on-going training for staff;
3. Internally auditing the implementation of this Law and of other related laws and regulations;
4. Evaluating their AML/CFT efforts.

The reporting entities must appoint qualified information gathering and reporting staff with AML/CFT experience at the management or senior level to take charge of the work stipulated in Paragraph 1 of this article. These individuals will also serve as coordinators with AMLIO.

ARTICLE 20: IMPLEMENTING RISK ASSESSMENT AND RISK-BASED MANAGEMENT PRINCIPLES

The reporting entities shall implement risk assessment and risk-based management principles on money laundering and financing of terrorism by determining, assessing, monitoring and mitigating such risks.

ARTICLE 21: KNOW YOUR CUSTOMER MEASURES

The reporting entities must know their customers by requiring them to show their identification documents such as ID card, household registration book, passport, enterprise registration licence or other official documents that can identify them or their authorised representatives for a transaction. They must properly record such details, make copies of documents and maintain good records.

ARTICLE 22: ENHANCING CUSTOMER DUE DILIGENCE (CDD) MEASURES

The reporting entities must apply CDD measures to customers for the following cases:

1. When providing services or undertaking transactions for new customers;
2. When carrying out occasional, one-off or several suspicious transactions;
3. When the transactions are complex, of high value, and show irregular characteristics;
4. When the transactions are suspected of relating to money laundering or the financing of terrorism;
5. When the information identifying customers is not complete or is suspected to be incorrect;

In addition, the reporting entities must pay continual attention to customers to ensure that the previously provided information is up to date and that customers' business operations are in accord with their profiles and their business operations' historical records including knowing the sources of their financing if necessary. The reporting entities must pay special attention to business dealings or transactions with natural persons, legal persons or organisations in a country where the law on AML/CFT does not exist or where it does exist but the enforcement of the law is not strict.

ARTICLE 23: COLLECTION OF DETAILED DATA ON CUSTOMERS

The reporting entities must collect, prove and verify the data on natural person customers, including names and surnames, dates of birth, nationalities, addresses and occupations of customers. For legal entity customers, the reporting entities must collect, prove and verify the data on names and addresses of companies, the identification document of directors, detailed information about shareholders, business operations and sizes. In case of failure to collect detailed data on customers as defined in paragraph one and two of this article, a reporting entity must cease providing its services to or maintaining any business relationships with that customer, and must treat any previous transactions as suspicious transactions and report them to AMLIO as defined in Article 30 and 31 of this Law.

ARTICLE 24: DATA COLLECTION ON CUSTOMERS' TRANSACTIONS

The reporting entities must collect data on customers' goals and objectives in using the services provided by or establishing business relations with their institutes. The reporting entities must find out whether their customers' business relations are for themselves or on behalf of others in order to find the real beneficiaries such as the owners of funds, including paid-in capital for the establishment of an enterprise, or a person with a decision-making authority.

ARTICLE 26: DEALINGS WITH CORRESPONDING BANKS

Financial institutions which maintain business relations or other similar relations with corresponding banks shall act as follows:

1. Review the legal person status of corresponding banks that they are doing business with;
2. Gather data on the nature of business operations of a corresponding bank;
3. Assess the credibility, management and audit of a corresponding bank based on the disclosed information;
4. Assess the implementation of AML/CFT of a corresponding bank;
5. Observe relevant laws and regulations relating to a business relation with corresponding banks.

If corresponding banks have business relations or transactions with shell banks or their subsidiary, the reporting entities shall not establish or continue business relations with such corresponding banks or their subsidiary.

ARTICLE 27: DATA COLLECTION ON WIRE TRANSFER

For each wire transfer, financial institutions must gather and check information on the name and surname, address, account number, and purpose of the transferor's transfer. In the case of acting as an intermediary for the transfer, a financial institution must ensure that the information on the transferor and details about the transfer are correctly and completely recorded before further delivery to a beneficiary. In case a financial institution receives a transfer with no information or with missing information on a transferor, it has to check and find the missing information from the transferring institute or from a beneficiary. If the information is not provided, a financial institution receiving the transfer shall refuse the payment to the beneficiary and shall transfer the money back to a transferring financial institution and immediately report the case to AMLIO.

ARTICLE 31: SUSPICIOUS TRANSACTION REPORT (STR)

In the case of a suspicion or a cause for a suspicion that a customer's transaction may be a consequence of a predicate offence, relating or connecting to money laundering and financing of terrorism, reporting entities shall report such transactions to AMLIO within three working days. This reporting requirement extends to a customer's attempt at conducting a transaction regardless of the completion status of the amount of money involved.

APPENDIX 2

INDICATORS OF LAUNDERING THE PROCEEDS OF THE ILLEGAL WILDLIFE TRADE

The Financial Action Task Force (2020: 60-62) has developed a series of **risk indicators that can be used by banks and financial institutions to assist them in identifying potential suspicious transactions and behaviour patterns that could be indicative of money laundering linked to the illegal wildlife trade.**

| CLIENT PROFILES (INDIVIDUALS AND CORPORATES) | CHECKED |
|---|---------|
| Involvement of international trade companies , including import-export, freight forwarding, customs clearance, logistics, or similar types of companies operating in the following commodities long high-risk corridors or ports for illegal wildlife trade supply and demand: raw or squared wooden logs, plastic waste or pellets, frozen food, fish maws, various kinds of beans, stone or quartz blocks. | |
| Use of common containers, consignees, transporter, clearing agents, or exporters as seen in other cases believed to involve the illegal wildlife trade. | |
| Activity involving politically exposed persons (PEPs) and wealthy businessmen/women, particularly those with environmental, game, or forestry oversight or environmental or wildlife-related businesses | |
| Involvement of legal wildlife-related entities such as private zoos, breeders, (exotic) pet stores, safari companies, pharmaceutical companies making medicines containing wildlife and wildlife collectors or reserves. | |
| Individual or beneficial owner(s) of a corporate domiciled in jurisdiction that is a prominent transit or demand country for illegal wildlife. | |
| TRANSACTIONS AND CLIENT ACCOUNT ACTIVITY | CHECKED |
| Large cash deposit by government officials working in wildlife protection agencies, border control or customs and revenue officials. | |
| Large cash or other deposits, wire transfers, multiple cash deposits and withdrawals, and/or unexplained wealth from government officials working in forestry agencies, wildlife management authorities, zoo and wildlife park employees, or CITES Management Authorities (CMAs). | |
| Large cash or other deposits, multiple cash deposits and withdrawals, and/or unexplained wealth from 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. | |
| Shipments of legal wildlife (fauna and flora) with anomalous, incomplete, or otherwise suspicious CITES certificates. | |
| Transactions using names of ingredients or products in the traditional medical trade that refer to CITES species. | |
| Illogical or anomalous loans between trading or import/export companies in key illegal wildlife trade source or transit countries. | |
| Switched bills of lading by traders previously implicated in criminal activity involving wildlife trafficking or trade fraud investigations or prosecutions. | |
| 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. | |
| Illogical or anomalous purchases, payments, or other transactions related to gold trading from business accounts of clients. | |
| Escrow-type transactions from/to accounts and companies with same beneficial owner in particular for payment of cross-border and transcontinental shipments. | |
| Transactions from known traffickers to individuals who then pay for couriers or packages via the post. | |

| | |
|---|----------------|
| Transactions for hired vehicles and domestic accommodation from known members of a trafficking syndicate who are not present in the country or region within a country. | |
| Third-party wire transfers/cash deposits to, or withdrawals by, known wildlife poachers and traffickers. | |
| Transaction references using specimen names or veiled speech. | |
| Transactions between licensed pet shop suppliers/breeders and known wildlife poachers and traffickers. | |
| Transactions to licenced pet shop suppliers/breeders that originate from overseas, and/or incommensurate with stated business activities. | |
| Large transactions to licenced pet shop suppliers/breeders where there is significant discrepancies between the animal/product ordered and the value of the good. | |
| International wire transfers from known wildlife traffickers to a relative's accounts as tuition, allowance, or family support payments. | |
| Large dollar wire transfers between wildlife farms and firms operating in inconsistent lines of business. Particular attention should be given to payments with firms that produce goods which may be used as "cover loads" to hide illicit wildlife products (e.g. manufacturers / traders of coffee, tea, beans, or used clothing). | |
| Payments between entities operating in disparate lines of business. | |
| Individuals or companies suspected of being involved, or linked to, illegal wildlife trade networks using bank accounts and addresses located in different countries. | |
| Middleman transactions – large incoming payments followed by smaller outgoing payments. | |
| Rental card transactions with two bookings close in time in neighbouring countries. | |
| OTHER | CHECKED |
| Adverse media connected to wildlife or environmental crimes identified in open and available sources on individuals and/or entities involved in reviewed financial transactions. | |
| Airline passengers traveling on high-risk illegal wildlife trade routes on tickets paid for by a third party or in cash. | |
| Payments from companies/owners from industries using illegal wildlife trade products (including traditional medicine manufacturers, leather producers, auctioneers of wildlife products, exotic food providers [including butchers, chefs, stall holders in wildlife markets and restaurants]) to known wildlife traders or their associates or other entities above that have been identified as being involved in the illegal wildlife trade. | |

APPENDIX 3

ILLEGAL WILDLIFE TRADE EXAMPLES

ELEPHANT IVORY

An estimated 415,000 African elephants remain in the wild. Each year around 20,000 are killed for their tusks. In research conducted by GlobeScan in 2019, covering 2,000 consumers from 15 cities in China, 14% of the respondents stated that they intended to purchase ivory in future even though they were aware that doing so is illegal (Globescan, 2019). Much of this continuing demand comes from consumers who regularly travel outside China.

African Elephants *Loxodonta africana* (except populations from Botswana, Namibia, South Africa and Zimbabwe) and Asian Elephants *Elephas maximus* are listed in Appendix I of CITES. All international trade in ivory has been prohibited since 1990 other than in exceptional circumstances. In addition, China implemented a commercial ban on the domestic sale and purchase of all ivory in December 2017 and in April 2020, continued to forbid the commercial import of ivory products. It is illegal for travellers and tourists returning from overseas to bring any amount of ivory into China.

In the period 2008-2017, about 393 tonnes of ivory was seized globally. Large quantities continue to be seized. For example:

- On 16 January 2019, Hong Kong Customs seized a shipment from Nigeria which contained 8,300 kg of pangolin scales and 2,100 kg of ivory, valued at USD7.9 million and destined for either Mainland China or Vietnam (Reuters, 2019).
- Between January and October 2019, China Customs seized over 9 tonnes of ivory (Sina Finance, 2019a).
- On 17 April 2020, Jiangmen Customs of China seized 413 kg of ivory and 28 kg of rhino horn and products, arresting nine individuals (Shanghai Customs District, 2019).

RHINOCEROS HORNS

In the past decade alone, more than 7,000 African rhinos have been poached, with just 25,000 African rhinoceroses now estimated to remain in the wild. In contrast, at the beginning of the 20th century, 500,000 rhinos roamed Africa and Asia (WWF, 2021).

In research conducted for USAID Wildlife Asia in 2018 covering 1,800 consumers from 6 cities in China, 13% of those surveyed stated that they were likely or very likely to purchase rhino horn in future (USAID Wildlife Asia, 2018).

All Asian rhinos are listed in CITES Appendix I, prohibiting any commercial international trade, while African rhinos are listed in both CITES Appendix I and II.

The illegal supply of rhino horns from Africa predominantly to Asia is reported to be over 30 times greater than in the early 2000s. In the period 2016-2017, at least 4,500 African rhino horns entered illegal trade globally, generating estimated proceeds of between USD79 and 292 million (Journal of African Elephants, 2020).

Large quantities continue to be seized. For example:

- On 5 April 2019, Hong Kong Customs detected 82.5 kg of rhino horn (valued at HKD16.5 million or USD2 million at 2020 rates) in cargo being transported from Africa to Malaysia via Hong Kong (Xinhua News Agency, 2019).
- On 1 June 2019, 9.79 kg of rhino horn were found by officials at Shanghai Hongqiao International Airport in the luggage of two passengers travelling from South Africa to Shanghai via Hong Kong (Sina Finance, 2019b).
- In January 2019, Dalian Customs seized 2.71 kg of rhino horns concealed in the luggage of a passenger who had travelled from Hong Kong (Baidu, 2019).



ROSEWOOD

Rosewood products, or Hongmu in Chinese, refer to a group of dark red tinted hardwoods sourced from various tropical tree species, especially *Dalbergia spp.* and *Pterocarpus spp.* These species have been used in the traditional Chinese furniture and craft industries for hundreds of years and demand remains high. China is the largest processing centre, retailing cluster and demand market for rosewood products (UNODC, 2020).

The excessive consumption of rosewood products and the presence of illegal product in supply chains has attracted international attention due to associated negative impacts on the environment, governance and livelihoods of local communities in source countries. For example, in the period 2010 to 2015, at least 350,430 timber trees (mainly rosewood) were cut down in protected areas in Madagascar and at least 1 million logs (152,437 tonnes) were illegally exported from the country.

In 2016, the trade regulation measures in place under CITES for some rosewood tree species were upgraded to try and halt the rapid decline of rosewood populations. Among 29 species listed in China's National Hongmu Standard, 17 have been included in the CITES Appendices I and II.

Based on legal trade and seizure data, the largest source of illicitly harvested rosewood is Africa (UNODC, 2020). Nigeria alone exported some 750,000 cubic meters of rosewood in 2017, which is equivalent to about four million trees, or over 30,000 shipping containers, an average of almost 100 container loads exported per day (UNODC, 2020).

Large quantities of these exports have been seized. For example, on 15 October 2020, Hong Kong Customs seized over 9 tonnes of rosewood, valued at HKD6 million (or almost USD 1 million at 2020 rates) in Tsing Yi port. The rosewood had come from the UAE and was being sent to mainland China via Hong Kong (Jiajunmi, 2020).



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THE ILLEGAL WILDLIFE TRADE IN LAO PDR – FACTS AND FIGURES (TRAFFIC, 2020B)

1. In 2016, two snapshot surveys found thousands of ivory products openly for sale, recording close to 8,000 ivory pieces and 87 individual rhino horn pieces for sale across three cities (Vientiane, Luang Prabang and the Golden Triangle). In 2018, a similar snapshot survey identified more than 13,000 ivory products for sale in seven cities throughout the country. At least 3,800 ivory products were seized in Luang Prabang and Don Sao between July 2018 and January 2019.
2. Lao PDR was the biggest importer of lion bones from South Africa between 2007 and 2016. In total, 4,828 lion bones and parts were reportedly exported to Lao PDR during this period, including 2,098 whole skeletons. In 2017 alone, 278 skeletons were reportedly exported.
3. More than 5,600 pangolins were seized in Lao PDR between 2010 and 2015. More than 2,700 pangolin scales were recorded for sale in 2016, about half of which were in Luang Prabang.
4. Some 980 wildlife, parts and products were recorded in Boten in April 2016. Bear products that were mostly manufactured in China and catering largely to Chinese clientele dominated market observations, with 78% of these being bear bile powder. A nationwide bear bile survey in 2016 recorded 908 individual bear parts and products being openly sold in 14 of the 25 towns surveyed.
5. Seven commercial facilities holding bears and tigers were recorded in 2017, with the highest numbers (60) in the town of Boten, a kilometre from the China border. Overall, at least 116 Asiatic Black Bears *Ursus thibetanus* and over 100 tigers were recorded in these facilities.
6. At least 74 Helmeted Hornbill parts and products were recorded in three locations, at least half of which were in Luang Prabang, between April and July 2016.
7. More than 40 tigers have been seized since 2000, with most coming from suspected captive sources.

TRAFFIC is a leading non-governmental organisation working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

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