Distribution in the marketplace

Rhino horn trafficking as a form of transnational organised crime 2012-2021

2022 GLOBAL THREAT ASSESSMENT
Preface

The Wildlife Justice Commission acknowledges the immense challenges facing law enforcement agencies that are investigating the transnational organised criminal networks trafficking in rhino horn. These challenges include legislative deficiencies, insufficient resources, mandate, technical capacity, intelligence sharing issues, and of course, the scourge of corruption. We also pay our respects to those officers and rangers who have paid the ultimate price and those who continue to risk their lives on the frontline preventing the poaching of rhinos and investigating these criminal networks.

The Wildlife Justice Commission is committed to continuing to support law enforcement agencies as they work to end the trafficking of rhino horn.

It is with this mission that we produce this threat assessment. It aims to share strategic intelligence that identifies and provides insights on present and emerging organised crime threats relating to rhino horn trafficking. It interprets and analyses intelligence holdings and information from open sources to build the global intelligence picture, propose hypotheses about the immediate or imminent threats, identify where intelligence gaps exist, and highlight vulnerabilities that could become potential threats in the future.

We hope that this assessment will go some way towards assisting law enforcement agencies working across the illegal rhino horn supply chain to maximise their response and impact in addressing this issue, and to continue to build on the important progress and achievements that are being made.

The full report is set out in 10 chapters covering key criminal elements of the illegal rhino horn trade.

Recognising the density of detail in the report, each chapter is written to be able to be read as a standalone topic with the aim of making the report more accessible and useful for policy makers, practitioners and researchers interested in a specific aspect of criminality. The stand alone publication focuses on the distribution in the marketplace.
Acknowledgements

The Wildlife Justice Commission is grateful to WWF for financial support and technical advice provided throughout the preparation of this threat assessment. We particularly acknowledge the invaluable support and input from Dr. Jo Shaw, Natalia Banasiak, Dr. Colman O’Criodain, and Leigh Henry. The report was edited by Dr. Richard Thomas.

We also acknowledge and thank Roy McComb, Consultant on Transnational Organised Crime, for his technical review of the threat assessment.

The preparation of this assessment also benefited from the financial contributions of The Nationale Postcode Loterij, Adessium Foundation, Arcadia - a charitable fund of Lisbet Rausing and Peter Baldwin, The Oak Foundation and Fred Foundation.
## Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>AIS</td>
<td>Automatic Identification System</td>
</tr>
<tr>
<td>ANAC</td>
<td>National Administration of Conservation Areas</td>
</tr>
<tr>
<td>ASB</td>
<td>Anti-Smuggling Bureau</td>
</tr>
<tr>
<td>CITES</td>
<td>Convention on International Trade in Endangered Species of Wild Fauna and Flora</td>
</tr>
<tr>
<td>DFFE</td>
<td>Department of Forestry, Fisheries, and the Environment</td>
</tr>
<tr>
<td>DRC</td>
<td>Democratic Republic of Congo</td>
</tr>
<tr>
<td>EEFC</td>
<td>Environmental Enforcement Fusion Centre</td>
</tr>
<tr>
<td>FRELIMO</td>
<td>Liberation Front of Mozambique</td>
</tr>
<tr>
<td>HAWKS</td>
<td>Directorate for Priority Crime Investigation</td>
</tr>
<tr>
<td>KLIA</td>
<td>Kuala Lumpur International Airport</td>
</tr>
<tr>
<td>OBK</td>
<td>Operasi Bersepadu Khazanah</td>
</tr>
<tr>
<td>PDR</td>
<td>(Lao) People’s Democratic Republic</td>
</tr>
<tr>
<td>PERHILITAN</td>
<td>Department of Wildlife and National Parks Peninsular Malaysia</td>
</tr>
<tr>
<td>RMB</td>
<td>Chinese Renminbi</td>
</tr>
<tr>
<td>SANParks</td>
<td>South African National Parks</td>
</tr>
<tr>
<td>SAPS</td>
<td>South African Police Service</td>
</tr>
<tr>
<td>SAR</td>
<td>(Hong Kong) Special Administrative Region</td>
</tr>
<tr>
<td>SERNIC</td>
<td>National Criminal Investigation Service</td>
</tr>
<tr>
<td>TCM</td>
<td>Traditional Chinese medicine</td>
</tr>
<tr>
<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
</tr>
<tr>
<td>USD</td>
<td>United States Dollar</td>
</tr>
<tr>
<td>VND</td>
<td>Vietnam Dong</td>
</tr>
</tbody>
</table>
Introduction

Rhino horn trafficking remains a severe problem that needs to be addressed with a new sense of urgency as transnational organised crime. Over the past 10 years, the illegal killing of rhinos and trafficking of their horns has grown as a global criminal enterprise, comprising multiple criminal components dominated by greed and the pursuit of substantial profits.

This threat assessment presents a comprehensive analysis of rhino horn trafficking during the decade from 1 January 2012 to 31 December 2021.

It was compiled following analysis of 674 rhino horn seizure incidents collected from open-source reports that occurred globally during this decade, in addition to seven years of criminal intelligence and findings from Wildlife Justice Commission investigations into rhino horn trafficking conducted since 2015, and other open-source research.

This assessment aims to examine the driving forces behind the trade and changes in the criminal landscape. It also considers the threat to rhinos in 2022, with recommendations to help inform interventions to address this issue and ensure the global response is commensurate and appropriately targeted to current and future needs.
Distribution in the marketplace

Online trade, social media platforms, and instant messaging services are a key tool to connect criminal actors and facilitate the distribution of rhino horn throughout the supply chain to the marketplace. Use of these platforms has increased substantially during the past decade to become the most important channel through which rhino horn is distributed in the illegal trade, rendering physical markets a comparatively immaterial threat. This chapter highlights the main platforms used, their target audiences, and how usage has changed over time. It is primarily based on intelligence collected during Wildlife Justice Commission investigations in addition to open-source research.

1. Sanitised intelligence and findings from seven years’ worth of Wildlife Justice Commission investigations are interwoven throughout this threat assessment to provide context and insights into changes in the criminal dynamics of rhino horn trafficking. Where information is drawn from any other source, it is referenced with footnotes and acknowledged as such. Any non-referenced information, inferences or interpretation should be understood as being sourced from Wildlife Justice Commission intelligence analysis.
KEY FINDINGS

✓ The illegal rhino horn trade is strongly enabled through online markets, the prevalence of which has increased over the past 10 years.

✓ The use of messaging apps, especially WeChat, to facilitate trade and transactions has been observed not just in China but also in Vietnam, Lao PDR, Cambodia, South Africa, Mozambique, Malaysia, and Nigeria.

✓ Although the use of WeChat has notably declined due to fear of law enforcement detection through keyword searches, many traders are circumventing this risk by sending voice messages instead of text messages.

✓ Traders avoiding WeChat have been switching over to other messaging apps, predominantly WhatsApp, but also Telegram and Signal, which are perceived to be safer.

✓ At a retail level, Facebook has also played an important role, which has shown to be particularly popular with Vietnamese traders as well as traders based in other countries to attract buyers in Vietnam.

✓ At the wholesale end of the market, deals are increasingly being kept to those who are part of closed, trusted networks only. Referrals are now common practice and traders will often not engage with new or unknown buyers. Individuals operating at this level are not suspected to use any online markets to attract buyers, but instead are able to successfully generate enough clientele through their networks to satisfy a lucrative criminal business.
Low prevalence of rhino horn trade on Chinese e-commerce platforms

In August 2020, the Wildlife Justice Commission assessed the levels of illegal wildlife trade occurring on Chinese e-commerce platforms including Alibaba, 1688, Taobao, Tmall, Pinduoduo, GUCN, Cang, JD, Google, and Baidu. The research was based on keyword searches for various types of products, including seven keyword variations that represent rhino horn. During the research period, 4,297 advertisements of wildlife, parts and derivatives were identified as being offered by 85 different sellers; however, only six of these advertisements were for rhino horn products, all of which were listed by three sellers on GUCN. GUCN is an e-commerce marketplace focused on antique objects, mostly for business-to-consumer retail trade. Other research has similarly found a very low prevalence of rhino horn trade on e-commerce platforms. These results suggest that e-commerce platforms do not pose a substantial threat as facilitators of this crime. Proactive measures taken by many of the popular platforms to prevent illegal wildlife advertisements on their sites could partly explain this finding. For instance, the Coalition to End Wildlife Trafficking Online reported that in the four years from its launch in 2018 to 2021, more than 11 million posts for illegal wildlife were blocked or removed from its members’ platforms. The Chinese government has stepped up its efforts in this regard as well, introducing a ban on any type of wildlife trade on all online and e-commerce platforms in January 2020, as the COVID-19 outbreak was beginning to spread. In the first month of the ban, e-commerce platforms aided in the removal, deletion or blocking of information relating to 140,000 wildlife products and closed around 17,000 accounts associated with the trade. However, a significant limitation of this approach is that users whose accounts are blocked or posts have been removed can easily emerge in newly-created groups or set up a new profile and continue to trade.

3. For example: Endangered Wildlife Trust (2022). *Report on rhino horn and elephant ivory being advertised for sale on e-commerce and social network platforms in South Africa.* This study found 26 items advertised on eBay that could possibly be rhino horn products. It was the only one of four e-commerce sites monitored that was found to host potential illegal rhino horn trade.
4. The Coalition to End Wildlife Trafficking Online brings together e-commerce, technology, and social media companies including Alibaba, Tencent, Baidu, Google, eBay, and others, with wildlife experts at the WWF, TRAFFIC, and IFAW. The 2021 progress update can be accessed at this link: https://www.endwildlifetraffickingonline.org/2021-progress-update
Frequent use of WeChat targeting the Chinese market

It is more probable that traders of high-value illicit commodities such as rhino horn prefer to use other platforms that provide greater levels of privacy and security for conducting their business. Given the way they operate, messaging and social media apps are more likely to host activity of a criminal nature, particularly apps with functions such as WeChat ‘Moments’ that provide users with an area to showcase illegal commodities covertly. ‘Moments’ allows WeChat users to share photos and videos with a closed group of friends or contacts, but friends of those friends cannot see the content, or any likes or comments on shared posts, making it a more private communication circle than other social media platforms.

“You, you look at my WeChat Moment, then you will know what products I do. Rhino horn, tiger, ivory, and a lot.”

– CHINESE TRAFFICKER, 2017

Analysis of the court judgements from convicted rhino horn trafficking cases in China between 2017 to 2021 shows that WeChat commonly features in the modus operandi of these cases and continues to be one of the preferred methods for Chinese criminals to communicate and arrange deals for this commodity. Chinese law enforcement authorities are also known to conduct undercover investigations via WeChat to identify and target those dealing in illegal wildlife products.

The Wildlife Justice Commission has also observed widespread use of WeChat among rhino horn traders during its investigations in Vietnam, Lao PDR, Cambodia, South Africa, Malaysia, Mozambique, and Nigeria. Traders at physical shops in Asia often provide their WeChat contact details for follow-up communication and to browse further products listed online. During an investigation in Nhi Khe village,

---

7. Analysis of convicted rhino horn cases was conducted based on judgements published on China Judgements Online, a database of all Chinese court judgements, accessed at: https://wenshu.court.gov.cn/
Vietnam from June 2015 to June 2016, 51% of traders were found to use WeChat to advertise products, with at least 8,300 images of illegal wildlife detected for sale during this period.8

In addition, WeChat has the mobile payment and digital wallet service WeChat Pay, which links to a user’s bank account or credit card and can be used to pay bills, purchase goods and services, or transfer money to other users. The Wildlife Justice Commission has frequently observed customers in China and Vietnam using WeChat Pay for rhino horn products, such as a Chinese couple who came to shop in Phu Khe, Vietnam in 2019 while investigators were undertaking a rhino horn product sighting, buying several pieces of chopped rhino horn and paying immediately with WeChat Pay. While most traders are flexible on payment methods and offer several options, some traders have specifically requested payments made by WeChat Pay. Alipay is another method of digital payment that is commonly used.

Adaptation of WeChat

A clear impact of Chinese law enforcement monitoring criminality on WeChat can be seen in the way it is contributing to traders altering their means of communication. The Wildlife Justice Commission began to observe changes in the use of WeChat as early as 2017, when a trader in Lao PDR responded to a WeChat text message enquiring about products with a voice message directing the investigator to only communicate with voice messages to discuss products, and to delete the conversation history and contact, then re-add him. The trader further stated that he refused to post pictures on his WeChat Moments. It is believed that the trader was employing this technique to avoid detection by WeChat’s security censorship.

By 2020 this scenario had further evolved with several high-level brokers in Vietnam stating their deliberate avoidance of discussing wildlife “business” on WeChat, instead suggesting the use of WhatsApp, Telegram, or Signal, which are banned in mainland China. Some of the known high-level Vietnamese traffickers were also resorting to the safer option of voice messages when communicating with Chinese traders on WeChat, thereby minimising the risk of crime being detected via keyword searches.

Preference for Facebook to target the Vietnamese market

In Vietnam, Facebook appears to be the preferred online platform for brokers to advertise their products for the Vietnamese retail market. During the Wildlife Justice Commission’s investigation of rhino horn trade in Nhi Khe village from 2015 to 2016, Facebook alone was found to be used by 20% of traders, while around 10% of traders used

---

both Facebook and WeChat. Platform preference is believed to be an indication of the traders’ target market, given that Facebook is not available in China, while it is the most popular social networking platform in Vietnam. Vietnamese traders on Facebook have been found to share images of various types of products for sale including whole horns with complete bases and carved rhino horn products such as libation cups, teapots, beads, sculptures, and jewellery.

Facebook is not only used by traders in Vietnam to connect with the domestic market but also by traders based in other countries looking to sell products to buyers in Vietnam. For example, intelligence received on a seizure of 15 pieces of rhino horn in September 2017 at Suvarnabhumi International Airport in Bangkok, Thailand indicated that the main dealer of this shipment was a Vietnamese trader based in Angola who had sold the horns via Facebook to two buyers in Vietnam. Facebook is also widely used elsewhere in Southeast Asia and is known to be a preferred platform for online illegal wildlife trade in Cambodia, Lao PDR, Myanmar, and Thailand.

In early 2021, the Wildlife Justice Commission received intelligence of a new method of using Facebook to host private livestream video auctions of wildlife products at set times, with the videos removed shortly after the auctions are finalised. The suspects involved in the auctions appear to be mostly based in Vietnam and Cambodia and connected by one or two degrees of separation. In the illegal auctions, images and videos of the wildlife items are shared publicly using tags for sharing with other users, often with over 20 tags per post. A multitude of profiles share each live auction at the same time, making it problematic to trace the origin and ownership of the videos. So far, this methodology appears to be mostly used for ivory and tiger products, and while rhino horn products have not yet been observed in a livestream auction, the level of privacy it offers to buyers could potentially make it an appealing option.

Use of other communication apps

WhatsApp is commonly used by traffickers, possibly favoured for its end-to-end encryption, broad global popularity, and the fact that it is less accessible to Chinese law enforcement authorities. Many traffickers opt to move communications to WhatsApp after initially making contact with buyers via a social networking platform such as Facebook. Some traffickers use multiple platforms depending on the preference of their clients, such

---

as a high-level Nigerian transporter who is known to use both WhatsApp and WeChat, depending on whether he is working with Chinese or Vietnamese criminal networks. Conversely, some traffickers have expressed a distrust of WhatsApp, such as a Vietnamese trafficker based in South Africa who claims all his connections use WeChat, and only “white people” use WhatsApp.

In addition, Telegram, a Russian instant messaging service, is preferred by some high-level wildlife traders in Africa as the “safer” means of communication. Zalo, a Vietnamese messaging app, has also occasionally been used to communicate with Vietnamese traffickers.

Trade occurs through close, trusted contacts

It is suspected that where illegal rhino horn transactions occur – online or in person - they are most likely to happen through close, trusted contacts and for this reason there is far less open advertisement of products through online channels, especially at the wholesale trade level. The Wildlife Justice Commission’s investigations have found this to be the case across the supply chain, with brokers often insisting on knowing how customers were referred prior to discussing “business” and refusing to deal with new or unknown customers.

For example, in 2019 a Vietnamese trafficker based in South Africa demonstrated a high level of caution on the first interaction, stating that “without knowing your reference, I can’t do anything. I need to be very careful.” Upon mentioning the major Vietnamese broker Nguyen Van Nam, the trafficker dropped his guard. “Oh, you know Ah Nam? Then you must be an insider, now I can really open my heart and say everything.” However, at the first meeting he still proceeded to test the investigator’s knowledge by showing photographs of two similar-looking Asian men and asking the investigator to identify which was Nguyen Van Nam.

Nguyen Van Nam himself was known to have a closed circle of Chinese buyers who generated enough demand and turnover that it was not necessary to seek new customers. He used WeChat for communication with the buyers but very rarely to advertise products, while Facebook was only used for social purposes. His reluctance to trade on social media set him apart from most other traders. (Refer to Chapter 7 of the full report for a detailed case study on Nguyen Van Nam’s criminal network).
Law enforcement and legal experts fighting transnational organised wildlife crime.