

**Testimony of Alexander von Bismarck, Executive Director, Environmental Investigation Agency**

**Before the U.S. House of Representatives Natural Resources Committee**

**Subcommittee on Water, Oceans and Wildlife**

Oversight Hearing on “*Wildlife Trafficking and the Growing Online Marketplace*”

April 27<sup>th</sup>, 2021

**Introduction**

Mr. Chairman, Ranking Member, and members of the Subcommittee on Water, Oceans and Wildlife, thank you for inviting me to appear before the Subcommittee today for the oversight hearing, “*Wildlife Trafficking and the Growing Online Marketplace*.”

I have investigated and studied global crime in natural resources for over 20 years. As an investigator and the Executive Director of the Environmental Investigation Agency, I have conducted international field investigations on every continent into criminal networks dealing in illegal wood, endangered species, and harmful chemicals. Before joining EIA, I researched linkages between economics, ecology and human health with the Harvard School of Public Health and the New England Aquarium. I have a master of science from the London School of Economics in Environment and Development and a BSc from Harvard University in Environmental Science and Public Policy. I am also proud to have served as a U.S. Marine.

The Environmental Investigation Agency, Inc. (EIA), a non-profit 501(c)(3) organization, has worked for more than 30 years to investigate and expose environmental crimes, and advocate for creative and effective solutions. EIA’s analyses of the trade in illegal timber, wildlife, and ozone-depleting substances have been globally recognized. As an example, our investigative work in the late 1980s provided evidence that led to the international ban on ivory trade.

**Wildlife Trafficking Online**

In recent years many of the world’s governments have finally started to treat wildlife crime as a serious crime, recognizing the negative impacts wildlife crime can have on biodiversity loss, governance, security, economies, indigenous peoples and local communities, livelihoods, and environmental and human health. By wildlife crime, we mean a range of illegal activities that include but are not limited to the trafficking of animal and forest products and live animals. Procurement of illegal wildlife products, often through the commissioning of poaching, money laundering, and corruption are all aspects of wildlife crime, and all can be carried out with the aid of the Internet.

As law enforcement efforts have primarily targeted overt, physical market sales, the illegal wildlife trade has increasingly moved online.<sup>1</sup> Unfortunately, the responses from governments and the private sector have overwhelmingly failed to match the exponential growth in online wildlife trafficking. Wildlife cybercrime is often still viewed as a nascent phenomenon and treated separately from more conventional approaches to tackling the illegal wildlife trade. The Conference of the Parties to United Nations Convention on Transnational Organized Crime consider both “Cybercrime” and “Wildlife and Forest Crime” to be “new and emerging crimes of concern”,<sup>2</sup> and as recently as 2018 the UNODC was referring to wildlife trafficking as a “new or emerging type of organized crime in cyberspace”.<sup>3</sup>

---

<sup>1</sup> UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species. Available at: [https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World\\_Wildlife\\_Report\\_2020\\_9July.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf)

<sup>2</sup> UNODC. Emerging Crimes. Available at: <https://www.unodc.org/unodc/en/organized-crime/intro/emerging-crimes.html>

<sup>3</sup> TRAFFIC (2019). Combating Wildlife Crime Linked to the Internet: Global Trends and China’s Experiences. TRAFFIC, Cambridge, UK. Available at: TRAFFIC (2019). Combating Wildlife Crime Linked to the Internet: Global Trends and China’s Experiences. TRAFFIC, Cambridge, UK. Available at: <https://www.traffic.org/site/assets/files/12352/combating-wildlife-crime-online-chinas-experiences.pdf>

The internet-enabled trade environment provides many advantages to those engaged in wildlife crime. Traffickers, brokers, and retailers can more easily conceal their identities, advertise products to a large, and often international, consumer base, and quickly process secure payments for their products. Raw wildlife products, such as rhino horns, elephant ivory tusks, tiger bones, and pangolin scales, worked as well as manufactured products, such as carvings, jewelry, medicine, and live animals are all trafficked online. Even plots of the Amazon rainforest, including protected areas and land belonging to indigenous peoples like the Uru Eu Wau Wau, are being illegally sold online.<sup>4</sup> A recent BBC investigation found that land grabbers are using Facebook Marketplace to sell plots of land in the Brazilian Amazon, without legal title to the land. More often than not the land ends up being used as cattle pasture. Much of the deforestation in the Amazon is being driven by illegal land speculation and cattle ranching, with international markets – including the United States – contributing to the problem by importing products such as beef and leather from Brazil with no questions asked. In response to the investigation, Facebook declined to halt land sales on its platform, saying the task of determining what is legal or illegal should be left to local authorities.

Messaging apps are used to negotiate trade deals and communicate other sensitive information, such as bank account details and sending Bills of Lading. Online payment applications and mobile banking tools allow for quick and secure processing of payments for illegal wildlife products. The use of courier companies to ship wildlife products to end-use consumers has grown in tandem with the illegal online trade in wildlife products. Courier companies often fail to adequately implement security screening procedures to detect illegal wildlife products and their staff have been caught working with wildlife traffickers to facilitate deliveries of illegal products by ensuring packages bypass security screening.<sup>5</sup>

A significant proportion of wildlife trafficking conducted online takes place on social media sites, although illegal and illicit trade in wildlife also occurs on e-commerce platforms and on websites offering traditional medicine products.<sup>6</sup> On social media platforms traffickers can join groups, channels, and other similar networking hubs where buyers and sellers can conduct business. Algorithms facilitate new connections between and among sellers and buyers by directing them to groups and pages dedicated to wildlife sales based on a user's activity history.<sup>7</sup>

## Challenges in Policing Wildlife Trafficking Online

The proliferation of wildlife crime online presents a host of challenges for law enforcement. The massive scale of the problem, exemplified by the sheer number of accounts engaged in the illegal wildlife trade and vast amount and variety of wildlife specimens advertised for sale, presents immense challenges for law enforcement agencies working to gather information, process it into intelligence, and conduct investigations. As far back as 2010, the U.S. Fish and Wildlife Service (FWS) described how it was simply not feasible for law enforcement agencies to police every single illegal wildlife trade post because: “The volume of trade is too large, the turnaround too rapid, the scope of the Web too extensive, the global array of laws too varied and complex, and the enforcement resources needed to massive for such an undertaking.”<sup>8</sup> These law enforcement obstacles to addressing online wildlife crime described by the FWS more than a decade ago are all still relevant today.

---

<sup>4</sup> Fellet, J. and Pamment, C. (2021). Amazon rainforest plots sold via Facebook Marketplace ads. *BBC*. Available at: <https://www.bbc.com/news/technology-56168844>

<sup>5</sup> Ibid.

<sup>6</sup> TRAFFIC. (2015). Moving Targets: Tracking Online Sales Of Illegal Wildlife Products in China. Available at: [https://www.traffic.org/site/assets/files/2536/moving\\_targets\\_china-monitoring-report.pdf](https://www.traffic.org/site/assets/files/2536/moving_targets_china-monitoring-report.pdf) ; EIA. (2020). Bitter Pill to Swallow: China's flagrant trade in leopard bone products. Available at: <https://eia-international.org/report/bitter-pill-to-swallow-chinas-flagrant-trade-in-leopard-bone-products/>

<sup>7</sup> ACCO. (2020). Two Clicks Away: Wildlife Sales on Facebook. Available at: <https://static1.squarespace.com/static/5e3a7fb845f8c668df48d437/t/5f8d9d26b6b09842cbd7eca7/1603116334186/ACCO+2+Clicks+Away+Wildlife+Sales+on+Facebook+Oct+2020+FINAL.pdf>

<sup>8</sup> CITES World Newsletter. 2010. Untangling the Net: U.S. Fish and Wildlife Service Efforts to Target Internet Wildlife Trafficking. Available at: <https://cites.org/eng/news/world/19/4.php>

While most countries have legislation in place that prohibits trade in threatened species, very few have implemented laws that specifically address the trade of wildlife online.<sup>9</sup> China is a notable exception. China's Wildlife Protection Law (WPL) specifically prohibits the illegal trade in wildlife on internet trading platforms. The WPL also makes it a criminal offense to publish any advertisements for illegal wildlife products, including advertisements published online.<sup>10</sup> According to Legal Atlas, as of July 2018 only six other countries had enacted legislation that specifically criminalized the illicit online trade in wildlife: Czech Republic, France, Mongolia, Portugal, Russia, and the UK.<sup>11</sup> The United States relies primarily on the Endangered Species Act and the Lacey Act to prosecute wildlife trafficking crimes. While these laws do not explicitly address the illegal online trade in wildlife, they are provisions that afford strong protections for threatened and endangered species and that criminalize the trade in illegally acquired wildlife products that can be effectively employed to prosecute wildlife cybercrime.

Laws that specifically prohibit wildlife cybercrime are rare, and the lack of consistent legislation across jurisdictions can handicap law enforcement action from the start.<sup>12</sup> Without a clear legal mandate to address online wildlife trafficking, enforcement agencies can be reluctant to dedicate often limited resources to an esoteric component of a still largely-underappreciated type of crime (i.e. wildlife crime) that already receives far less attention than more high-profile criminal activities like trafficking in drugs, weapons, and people. Many enforcement agencies do not have a dedicated wildlife cybercrime unit and lack the expertise to effectively police the online illegal wildlife trade. Indeed, a consistent lack of law enforcement funding, training, and capacity focused on wildlife cybercrime is prevalent across all jurisdictions.<sup>13</sup>

While dealers may advertise a litany of illegal wildlife products for sale on their accounts or to group pages on social media, EIA investigators have found that in many instances dealers will not maintain a fully-stocked inventory and instead will acquire products to fill orders on an as-needed basis. As a result, law enforcement operations can be thwarted if raids are conducted but no wildlife products are discovered in the possession of a suspect.

Fake products are widespread, and sorting out the real products from the imitations can be incredibly difficult (if not impossible) when looking at an image on a computer screen. Even if products do appear authentic, the offer may not be. EIA investigators have encountered many examples of scammers using the same images or doctored images downloaded from the internet. Traders will use code words for products like ivory and rhino horn to avoid detection by keyword search, and increasingly traders are avoiding using any words at all to describe their products, instead pairing images of advertised products with emojis.

Traffickers are also able to exploit privacy features built into social media platforms, such as private groups, and employ simple and widely-available tools to remain anonymous online. Virtual Private Networks, or VPNs, allow buyers and sellers to avoid moderation by masking their locations and IP addresses, while the use of third-party messaging applications like Viber, Telegram, Line, WhatsApp, and WeChat keeps trade deal negotiations private. Communication among traders across multiple social messaging apps in different sovereign jurisdictions poses significant challenges when it comes to tracking the "paper trail" and evidence collection.

The Financial Action Task Force, the global money laundering and terrorist finance watchdog organization, identified evolving payment infrastructure for online sales and its capability for significant

---

<sup>9</sup> Global Initiative Against Transnational Organized Crime. (2018). Catch Me If You Can: Legal challenges to illicit wildlife trade over the internet. Available at: <https://www.legal-atlas.com/uploads/2/6/8/4/26849604/digital-dangers-catch-me-if-you-can-july-2018.pdf>

<sup>10</sup> Wildlife Protection Law of the People's Republic of China. Available at: [https://eia-international.org/wp-content/uploads/WPL-Final-Law\\_translation\\_rev-January-2019.pdf](https://eia-international.org/wp-content/uploads/WPL-Final-Law_translation_rev-January-2019.pdf)

<sup>11</sup> Global Initiative Against Transnational Organized Crime. (2018). Catch Me If You Can: Legal challenges to illicit wildlife trade over the internet. Available at: <https://www.legal-atlas.com/uploads/2/6/8/4/26849604/digital-dangers-catch-me-if-you-can-july-2018.pdf>

<sup>12</sup> Ibid.

<sup>13</sup> INTERPOL Cyber enabled crime workshop. (2018). Restricted Workshop Report on Best Practices in tackling Cyber-enabled Wildlife Crime.

growth as presenting potential challenges for countering the illegal wildlife trade.<sup>14</sup> Online payment systems, sometimes built into social media platforms, and banking tools like M-Pesa and Alipay enable quick payments for wildlife products and can be used to launder proceeds from illegal wildlife trade deals.<sup>15</sup>

Most social media and e-commerce companies have instituted policies that prohibit illegal wildlife trade, though enforcement of such policies has proven largely insufficient to prevent wildlife trafficking from occurring on their platforms. This is especially true for social media companies, which rely on deleting accounts of individual users, pages, and groups engaged in wildlife trafficking as the main form of moderation. Some companies will take this step only after a third-party (e.g. an NGO) reports the account or illicit activity rather than proactively searching for and removing accounts, groups, and advertisements that violate their terms of service or the law.<sup>16</sup> Deleting accounts may have an immediate, short-term impact of suppressing a dealer's ability to advertise and communicate with potential customers, however traders can quickly and easily create new accounts and groups to resume sales, or simply switch to other platforms.<sup>17</sup> It is unclear how successful tech companies have been at preventing this kind of recidivism.

E-commerce sites and social media platforms also make it easy for traders and consumers to exploit asymmetrical legislative frameworks regulating trade in wildlife products where a particular product may be legal in one jurisdiction and illegal in another. For instance, Japan hosts one of the last remaining and largest legal domestic ivory markets on earth. An estimated 260 tonnes of ivory have been stockpiled for sale on the Japanese market<sup>18</sup> by the more than 16,000 registered ivory traders located throughout the country.<sup>19</sup> International commercial trade of ivory has been prohibited by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) since 1989 and many of Japan's neighbors, such as China, Taiwan, and Vietnam, have banned the domestic trade in ivory. Until recently, ivory products were widely available on Japanese e-commerce sites and could easily be purchased and shipped to individuals located outside Japan. Some traffickers have exploited the convenient supply of ivory from Japan to build up their inventory before re-selling the ivory to Chinese consumers using social media platforms. More than 5.4 tonnes of ivory have been illegally imported from Japan since 2009, with the vast majority seized by Chinese authorities. In one major case, a pair of ivory traders smuggled 3.2 tonnes of ivory purchased on the Yahoo! Japan online shopping site into China between 2010 and 2012 before being prosecuted by the Chinese authorities.<sup>20</sup> In November 2019 Yahoo! Japan announced that it was prohibiting the sale of elephant ivory on its shopping and auction platforms due to evidence that ivory purchased on its platform was being illegally exported abroad, becoming the last major Japanese e-commerce company to finally ban ivory sales.<sup>21</sup>

## COVID-19 and Online Wildlife Trafficking

The COVID-19 pandemic has significantly affected the international illegal wildlife trade. In the early days of the pandemic when panic and uncertainties about transmission and treatment were at their peak, some

---

<sup>14</sup> FATF (2020), Money Laundering and the Illegal Wildlife Trade, FATF, Paris, France,

<http://www.fatf-gafi.org/media/fatf/documents/Money-laundering-and-illegal-wildlife-trade.pdf>

<sup>15</sup> Ibid.; EAL. (2017). *Grinding Rhino*. Available at: <https://earthleagueinternational.org/wp-content/uploads/2017/07/Grinding-Rhino-July2017-Elephant-Action-League.pdf>

<sup>16</sup> Lapowsky, I. (2018). How Facebook Groups Became a Bizarre Bazaar for Elephant Tusks. *Wired*. Available at:

<https://www.wired.com/story/tusks-horns-and-claws-inside-the-fight-to-destroy-the-animal-parts-bazaar-on-facebook/>

<sup>17</sup> UNODC, World Wildlife Crime Report 2020: Trafficking in Protected Species. Available at:

[https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World\\_Wildlife\\_Report\\_2020\\_9July.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf)

<sup>18</sup> Written response from the Wildlife Division, Nature Conservation Bureau, Minister of Environment to Sakamoto M./Japan Tiger and Elephant Fund, dated on 2 April 2020

<sup>19</sup> Japan Wildlife Research Centre. July 31 2020. <http://www.jwrc.or.jp/service/jigyousha/files/tourokubo.pdf>

<sup>20</sup> CITES. (2017). Report of the Elephant Trade Information System (ETIS). CoP 17 Doc.57.6 (Rev.1) Available at:

<https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-57-06-R1.pdf>

<sup>21</sup> EIA. (2019). End of an Era: Yahoo! Japan Ceases Ivory Sales. Available at: <https://eia-global.org/blog-posts/20191112-end-of-era-yahoo!-japan-ceases-ivory-sales>

online wildlife traders were quick to seize on the opportunity to promote alleged remedies for the coronavirus that contained rhino horn, tiger bone, and other endangered and illegal wildlife products.<sup>22</sup>

For instance, in the spring of 2020 EIA investigators discovered wildlife traffickers based in Laos and China selling a Traditional Chinese Medicine (TCM) product called Angong Niu Huang Wan on their WeChat accounts.<sup>23</sup> The version of the product advertised by the traffickers is apparently produced in North Korea and contains rhino horn – which is illegal – according to the ingredients list shared by the traffickers. EIA had previously reported these traffickers to the relevant government authorities and international agencies, though they have continued to operate with impunity.

Countrywide lockdowns around the world have led to major disruptions and reductions in international travel and in turn to the international trade routes that traffickers utilize to move illegal wildlife products. In response, wildlife traders in Africa are believed to be stockpiling large quantities of ivory, pangolin scales and other wildlife products in expectation of renewed sales when travel restrictions are lifted.<sup>24</sup> Some traders have turned to alternative methods for moving their products to buyers in Asia, such as dispatching shipments via sea instead of air.<sup>25</sup>

Travel restrictions have also meant that traders have increasingly relied on social media platforms like WeChat and messaging applications like WhatsApp to organize and conduct illegal wildlife trade deals. In pre-pandemic era, it was unusual for the wholesale raw materials suppliers of organized criminal networks based in Africa to sell to Vietnamese and Chinese buyers without meeting in-person. With international travel curtailed, traders have become more flexible and are willing to take greater risks by trusting online buyers when finalizing sales in order to continue bringing in revenue.<sup>26</sup>

### **EIA Actions to Counter Online Wildlife Trafficking**

As the Committee will recall, the “I” in EIA stands for investigation. Investigating and exposing environmental crime is what EIA does best and it is a skill we have been continually honing ever since we conducted our first investigation into the illegal ivory trade in the late 1980s. Just as the technologies and *modus operandi* of criminals evolves over time, so must our investigative tactics and strategies. The very same social media platforms that wildlife traffickers use to connect with suppliers, traders, and buyers have also become key analytical tools for us as we develop and carry out investigations into organized criminal networks controlling the trade in illegal wildlife and forest products.

Turning the vast amount of raw data available online into useable intelligence is an arduous, time consuming process and the overwhelming amount of information – in the form of trader profiles, products advertised for sale, and group pages dedicated to the buying and selling of illegal wildlife products – can be challenging to process. While EIA does collect these types of data, when it comes to countering wildlife trafficking online, our work tends to focus on building profiles and mapping the social networks of persons of interest who are members of organized wildlife trafficking syndicates operating in Africa and Asia. This information is used to inform our investigations and may be shared with law enforcement as appropriate.

When information gathered is not relevant to a particular EIA investigation, when entities are considered low level in the trade hierarchy, and when law enforcement intervention is unlikely, EIA often works with in-country partners to report accounts directly to companies to get the accounts shut down and

---

<sup>22</sup> EIA. (2020). “Glue” made from the bones of endangered tigers is being sold to promote health during the pandemic. Available at: <https://eia-international.org/blog/glue-made-from-the-bones-of-endangered-tigers-is-being-sold-to-promote-health-during-the-pandemic/>

<sup>23</sup> EIA. (2020). China and Laos wildlife traffickers exploiting coronavirus fears to peddle illegal wildlife. Available at: <https://eia-international.org/news/china-and-laos-wildlife-traffickers-exploiting-coronavirus-fears-to-peddle-illegal-wildlife-fake-cures/>

<sup>24</sup> EIA. (2020). While you’ve been in lockdown, so have wildlife criminals – and many of them have been ‘working from home’. Available at: <https://eia-international.org/news/while-youve-been-in-lockdown-so-have-wildlife-criminals-and-many-of-them-have-been-working-from-home/>

<sup>25</sup> Ibid.

<sup>26</sup> Ibid.

advertisements removed. While we have found tech companies to be fairly responsive to such alerts, the long-term effectiveness of this kind of ad-hoc moderation is unclear.

## Conclusion

World governments are finally beginning to acknowledge the threats posed by wildlife cybercrime. The Parties to CITES have adopted resolution on *Compliance and enforcement* that includes a suite of recommendations directed at Parties to address wildlife crime linked to the internet. Included among these are the recommendations to establish a national-level enforcement unit dedicated to investigating wildlife cybercrime or incorporate wildlife trade issues into existing cybercrime units, appoint national focal points of contact with expertise in online investigations and prosecutions to serve as focal points for enquiries from other parties and intergovernmental organizations, and engage directly with online tech companies raise awareness of online wildlife crime and publish policies to prevent illegal wildlife trade on their platforms.<sup>27</sup>

INTERPOL, a member of the International Consortium for Combatting Wildlife Crime<sup>28</sup>, has also begun to turn its focus toward addressing wildlife cybercrime. Through its Global Complex for Innovation (IGCI) based in Singapore, INTERPOL provides assistance to world governments as they tackle the illegal online trade in wildlife in the form of investigative support, criminal intelligence analysis support, and general guidance.<sup>29</sup> In 2020 INTERPOL produced a volume of confidential guidelines, *Wildlife Crime Linked to the Internet*, for law enforcement practitioners to help governments more effectively investigate and prosecute wildlife crime linked to the internet.<sup>30</sup> With funding support from USAID, INTERPOL's Environmental Security Programme and IGCI have also conducted digital forensics training courses to train wildlife investigators on techniques to extract and analyze data recovered from electronic devices.<sup>31</sup>

Many tech companies have instituted policies to prevent the illegal wildlife trade on their platforms, and dozens of the world's leading social media, e-commerce, and search companies have joined the Coalition to End Wildlife Trafficking Online to take an industry-level approach to preventing online wildlife trafficking.<sup>32</sup> Such actions are welcome and represent important steps to eliminating the illegal wildlife trade across popular social media and e-commerce sites, however to date the implementation of such policies has been far from sufficient across many of these platforms. Tech companies must be more proactive in moderating content across their sites and increase collaboration and communication with law enforcement agencies investigating and prosecuting wildlife cybercrime. This will likely require tech companies to invest in additional staff with specialized training and in the development and implementation of advanced technologies that can help to automate the detection and analysis of vast amounts of data.

The United States is well-positioned to lead by example when it comes to countering the illegal online trade in wildlife. The FWS Office of Law Enforcement (OLE) began investigating online wildlife crime as far back as the late 1990s,<sup>33</sup> and in the decades that have followed the challenges to policing wildlife crime online have only increased. Law enforcement authorities must sift through enormous amounts of advertisements, posts, and user profiles in multiple languages spread across dozens of platforms and that fall within multiple jurisdictions. As the lead agency for countering wildlife trafficking FWS OLE

---

<sup>27</sup> CITES Resolution Conf. 11.3 (Rev. CoP18) *Compliance and enforcement*. Available at: <https://cites.org/sites/default/files/document/E-Res-11-03-R18.pdf>

<sup>28</sup> International Consortium on Combatting Wildlife Crime. [https://cites.org/eng/prog/iccwc\\_new.php](https://cites.org/eng/prog/iccwc_new.php)

<sup>29</sup> CITES. (2019). Notification to the Parties No. 2019/42: Wildlife crime linked to the Internet. Available at: <https://cites.org/sites/default/files/notif/E-Notif-2019-042.pdf>

<sup>30</sup> INTERPOL. (2020). Wildlife Crime Linked to the Internet: Practical Guidelines for Law Enforcement Practitioners. Available at: [https://cites.org/sites/default/files/I/INTERPOL\\_Guidelines-Wildlife\\_Crime\\_Linked\\_to\\_Internet-March2020-PUBLIC.pdf](https://cites.org/sites/default/files/I/INTERPOL_Guidelines-Wildlife_Crime_Linked_to_Internet-March2020-PUBLIC.pdf)

<sup>31</sup> INTERPOL. (2017). INTERPOL launches first digital forensics training course for wildlife investigations. Available at: <https://www.interpol.int/en/News-and-Events/News/2017/INTERPOL-launches-first-digital-forensics-training-course-for-wildlife-investigations>

<sup>32</sup> Coalition to End Wildlife Trafficking Online. (2020). Offline And In The Wild: A progress report of the Coalition to End Wildlife Trafficking Online. Available at: [https://c402277.ssl.cf1.rackcdn.com/publications/1308/files/original/Offline\\_and\\_In\\_the\\_Wild\\_-\\_Coalition\\_2020\\_Progress\\_Report.pdf?1583110977](https://c402277.ssl.cf1.rackcdn.com/publications/1308/files/original/Offline_and_In_the_Wild_-_Coalition_2020_Progress_Report.pdf?1583110977)

<sup>33</sup> CITES World Newsletter. 2010. Untangling the Net: U.S. Fish and Wildlife Service Efforts to Target Internet Wildlife Trafficking. Available at: <https://cites.org/eng/news/world/19/4.php>

should, together with partner agencies, build on its successful anti-wildlife trafficking track record by prioritizing the illegal online trade in wildlife. FWS OLE will need to receive the necessary support from Congress to ensure that it has sufficient resources and specialized staff to investigate online wildlife crime. This could entail the formation of a dedicated wildlife cybercrime unit within FWS OLE, again supported by sufficient funding from Congress to ensure its success.

USAID, the State Department's Bureau of International Narcotics and Law Enforcement Affairs, and FWS have already started to incorporate cybercrime into anti-wildlife trafficking trainings provided to law enforcement agencies around the world. The U.S. should continue to provide these trainings to our international government partners and the inclusion of cybercrime should be standard protocol.

Countering wildlife trafficking has proven to be a bipartisan issue that can garner support on both sides of the aisle on Capitol Hill, which has led to the adoption of important anti-wildlife trafficking laws in recent years, such as the END Wildlife Trafficking Act. However, provisions that specifically addressed wildlife crime online were not included in the END Act, and indeed are often been missing from anti-wildlife trafficking legislation. Key initiatives authorized by the END Wildlife Trafficking Act are set to expire this year, and the 117th Congress should take this opportunity to permanently authorize the END Act and include new provisions that would enhance the US Government's ability to prevent wildlife cybercrime.

Wildlife cybercrime can no longer be considered a "new and emerging" type of crime. Wildlife cybercrime *is* wildlife crime, one of the largest illegal global trades valued at up to \$23 billion annually.<sup>34</sup> This estimate doesn't account for global forestry crimes like illegal logging, which have been valued at between \$51 billion and \$152 billion.<sup>35</sup> Social media platforms, e-commerce sites, messaging applications, and online payment and banking tools are all inextricable components of wildlife crime in the 21<sup>st</sup> century. The traffickers recognized this first, and now the world's governments and private sector tech companies must catch up.

Thank you for your time, and I would be happy to answer any questions.

---

<sup>34</sup> Nellemann, C., Henriksen, R., Kreilhuber, A., Stewart, D., Kotsovou, M., Raxter, P., Mrema, E. and Barrat, S., 2016. *The rise of environmental crime: a growing threat to natural resources, peace, development and security*. United Nations Environment Programme (UNEP). Available at: <https://wedocs.unep.org/handle/20.500.11822/7662>

<sup>35</sup> Ibid.