



**GLOBAL
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ORGANIZED CRIME

ENVIRONMENTAL CRIME IN VIETNAM AND INDONESIA

CIVIL SOCIETY AS CHANGE AGENTS

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EXECUTIVE SUMMARY

This report examines civil society's role in disrupting the illegal trade of endangered animals and environmental commodities in Vietnam and Indonesia. It is the product of a Capstone project delivered by a team at New York University Robert F. Wagner School of Public Service (NYU Wagner).

Indonesia and Vietnam were selected as case studies as they are among the world's most significant markets for illegal wildlife trade (IWT) and other environmental crimes. In both countries, transnational organized crime syndicates have formed complex and adaptive networks that regularly exploit cultural and economic drivers of IWT. While law enforcement is actively engaged in combating the issue, lack of capacity and IWT prioritization are persistent issues. Legislation tends to target small- to medium-sized enterprises, rather than large trafficking networks, while both legislation and regulation contain loopholes which are exploited by traffickers. More broadly, uneven regulations and variances in the rule of law across South East Asia present challenges for both countries to work in tandem against environmental crime. Corruption is also an enabler of IWT networks in both countries (and across the region more generally).¹

This report argues that civil society organizations (CSOs) have a key role to play in the fight against IWT. CSOs do not face the same political and cultural constraints as international NGOs (INGOs) and have a more nuanced and first-hand understanding of local needs and contexts. They have proven effective in raising the profile of wildlife trafficking and environmental crimes on the policy agenda and among the public, particularly among young people. CSOs have also established successful programmes aimed at enhancing law enforcement operations against environmental crimes, while grassroots campaigns have generated pressure on government over environmental issues.

But CSOs also face steep challenges. Vietnam and Indonesia both have laws restricting criticism of the government, and members of civil society who speak out against environmental policies frequently lack protection from prosecution. In addition, CSOs that rely on INGOs for funding at times find themselves balancing donor requirements with programming needs, leading to perceptions among local people that they are merely Western instruments.

This report concludes with a series of recommendations aimed at bolstering the effectiveness of CSOs in combating IWT and operating in the public realm.

Methodology

The research, findings and recommendations of this report are based upon a literature review and interviews with various stakeholders from international and local NGOs, educational institutions, law enforcement agencies and public media outlets in the two case countries (see Annex). Vietnam and Indonesia were selected as case study countries due to their crucial habitats for endangered species of flora and fauna, cultural and economic drivers for IWT and the presence of civil society organizations that have shown success in tackling aspects of IWT.



ILLEGAL WILDLIFE TRADE IN SOUTH EAST ASIA: A BOOMING MARKET

Vietnam and Indonesia possess some of the world's richest and most biodiverse habitats. Between 10 and 20 per cent of the world's plant and animal species can be found across Indonesia's 17 000 islands,² while Vietnam hosts nearly 10 per cent of the world's total animal species, many of which are endemic and/or endangered.³



FIGURE 1 Vulnerable locations for the illicit trade in wildlife and timber.



Transnational organized crime actors have profited from these natural riches, sourcing and smuggling vast quantities of wildlife through the region to lucrative destination markets, enabled by high levels of corruption, diverse transport infrastructure, regulatory loopholes and shortfalls in law enforcement.⁴ The associated cost of IWT – both financially and ecologically – has been devastating, especially since 1995, when a regional economic boom helped drive an increase in the use of rare environmental and wildlife products in traditional medicines, local cuisine, jewellery and as pets.⁵ Key products exploited include pangolins, tigers and Asiatic and sun bears, with criminal depredation pushing several species closer to extinction. Sun Bears are now considered locally extinct in Java,⁶ while the Sunda pangolin (*Manis javanica*) and Chinese pangolin (*Manis pentadactyla*) of Vietnam are both categorized as ‘critically endangered’ on the International Union for Conservation of Nature’s Red List of Threatened Species.⁷ Marine products have also been heavily and illegally exploited: Vietnam’s Illegal, Unreported, and Unregulated Fishing (IUU) Fishing Index score is 3.16 (out of five), placing it in the top five of the worst-performing countries worldwide, while Indonesia ranks among the top ten worst-performing countries for two out of three IUU indicator types.⁸

Illegal timber is one of the most profitable and widespread criminal enterprises: in 2013, the United Nations Office on Drugs and Crime (UNODC) estimated that ‘the value of trafficking in wood-based products in the region [was] worth US\$17 billion annually, US\$700 million annually in Vietnam, making it even more lucrative than heroin (US\$16.3 billion) and in methamphetamines (US\$15 billion).’⁹ Meranti, keruing, kapur, mersawa and teak are the most heavily trafficked timber species throughout Indonesia, with plywood and sawn timber being historically the most trafficked environmental products in the country.¹⁰ In Vietnam, between 20 and 40 per cent of all harvested timber thought to be illegal, and profits from illegally harvested ramin exceed those generated from drug smuggling.¹¹

The illegal timber industry also highlights the role that socio-economic hardship plays in fuelling IWT, with many poor communities turning to timber harvesting in protected areas as a means to substitute income when there are crop failures or a lack of alternative income sources.¹² Likewise, poachers sourcing pangolin in Sumatra, Java and Kalimantan¹³ are generally low-income locals who then sell whole animals to local traders, before the animals are exported by air or sea to China, Hong Kong, Taiwan, Vietnam or Malaysia. Traffickers’ ability to exploit such socio-economic dynamics makes IWT a complex political problem that requires viable economic alternatives to poaching; top-down interdiction and legislation will not staunch supply.

Traffickers also exploit the countries’ complex geographies and range of infrastructure. Indonesia’s numerous remote islands, 6.4 million square kilometres of open ocean (representing two thirds of its territory) and 108 000 kilometres of coastline pose enormous challenges for government oversight.¹⁴ There are 24 official international harbours with adequate regulatory measures,¹⁵ but nearly 1 000 smaller harbours that are not as heavily controlled. Likewise, Vietnam’s road border crossings between China, Laos and Cambodia, its seaports in Cat Lai, Da Nang and Hai Phong, and its Tan Son Nhat and Noi Bai airports are not properly equipped to address the volume of trafficked wildlife products.¹⁶

A climate of impunity also creates the ideal conditions for criminals to operate. Although Indonesia joined the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1979, legally protected species are still found in open wet markets for use as pets, in culturally popular songbird competitions and in some cases for food or medicine.¹⁷ This ease of operating also applies to the internet – an increasingly important marketplace for IWT – where traders openly advertise IWT products on social media. The Wildlife Conservation Society (WCS) estimated that in 2017 at least 40 per cent of wildlife traders in Indonesia transitioned



to online markets to complete their sales.¹⁸ Under Indonesian law it is not a crime to post illegal products for sale, only a crime to complete the actual sale of said products. This makes it increasingly difficult to regulate and/or prosecute traffickers who use online platforms as their marketplace of choice.¹⁹ In Vietnam, the rising demand for rare animal parts to be used as ingredients in traditional medicine, as status symbols or investments has been propelled by Vietnam's emerging upper and middle classes, despite Vietnam being a party to CITES since 1994.²⁰ This broad societal acceptance of IWT products has undermined the efficacy of legislative restrictions, and highlights the need for education around IWT.

The COVID-19 pandemic had various impacts on IWT in Vietnam and Indonesia. The potential transmission of the novel coronavirus from wildlife to humans at a wet market in Wuhan, China, in January 2020 led to a regional appraisal of the wildlife trade, both licit and illicit. In February 2020, China enacted a ban on the use of wildlife as food,²¹ while Vietnam banned wildlife trade imports (but not domestic sales) in July 2020.²² Regional COVID-19 travel restrictions, which grounded flights and closed borders, also reduced many IWT flows.

That said, China's ban may have displaced IWT to Vietnam and Indonesia,²³ and there were reports of stockpiling by traffickers seeking to take advantage of when the borders reopened.²⁴ Criminals also exploited the opportunities presented by lockdowns: the Global Land Analysis and Discovery Laboratory discovered that Indonesia lost 130 000 hectares of forest in March 2020²⁵ as illegal loggers took advantage of strict social distancing curfews and reduced police patrols in forests.²⁶ The pandemic also reinforced the increasingly central role played by the internet in IWT: during the pandemic there were large online sales of exotic pets such as the Javan Slow Loris, a primate species listed under CITES Appendix I (which bans all commercial trade).²⁷

State-led efforts to combat illegal wildlife trade

In recent years Vietnam has ramped up law enforcement and legislative measures to combat IWT. In January 2018, new codes increased Vietnamese's prison terms for wildlife trafficking violations from seven to 15 years, bolstered the following year by new punishments for exploiting fisheries and illegal trading in aquatic products.²⁸ Vietnamese law enforcement has also actively sought to improve cooperative capacity and intelligence sharing with their Lao and Cambodian counterparts, as well as partnering with the UNODC in 2019 for a three-day training session.

The increased law enforcement capacity in Vietnam has led to more environmental crime cases being investigated, resulting in more arrests of traffickers and other participants (or network members)²⁹ and some significant seizures. In 2019, Vietnamese officials seized over 24 tonnes of ivory,³⁰ including one seizure in March of 2019 of nine tonnes of ivory in a shipping container in the port city of Da Nang – the world's largest ever-recorded ivory seizure, representing over 1 000 dead elephants.³¹

Indonesia has seen relatively little legislative movement in recent years to tackle the wildlife trade in fauna, although 2019 saw the introduction of the Quarantine Act, which raised possible jail terms to 10 years.³² In June 2020, a man was sentenced under this new law to four years in prison and a US\$68 000 fine for smuggling a leopard and four lion cubs – the harshest penalty in Indonesia ever for wildlife trafficking, according to the Indonesian Centre for Environmental Law.³³ Overall, however, the illegal logging industry sees much higher prioritization by Indonesian authorities as a result of having tangible, quantifiable economic and environmental impacts.³⁴



Law enforcement in Indonesia faces serious funding constraints: between 2015 and 2017, the Directorate General of Law Enforcement for Environment and Forestry had a yearly budget of US\$13.7 million, which in Papua province allows for only one police officer per 500 000 hectares.³⁵ Despite this, Indonesian law enforcement has had some notable successes in recent years. When law enforcement started intervening in manta ray poaching in eastern Indonesia, poaching decreased 'from hundreds of manta rays poached in 2016, to less than forty in the current year [2021].'³⁶ There have also been improvements in detecting illegal trafficking. From 2015 to 2019, TRAFFIC reported that there were over 1 400 wildlife seizures in Indonesia, in which the Indonesian Agriculture Quarantine Agency (BKP) played a significant role.³⁷



THE ROLE OF CIVIL SOCIETY IN COMBATING ILLEGAL WILDLIFE TRADE

Civil society has an important and unique role to play in the fight against IWT, from disrupting supply-side poaching to reducing demand for IWT products. Although some CSOs are perceived as representing a middle-class urban perspective, detached from the facts on the ground, other CSOs have made efforts to partner with local populations and diversify their membership, creating a deep understanding of the local context. CSOs also have provided intelligence and support to law enforcement operations and judicial prosecutions. Some CSOs also coordinate campaigns to highlight environmental crime issues and press for justice.

Raising awareness and education

'Ten years ago, there was no emphasis on wildlife trafficking [but] today there is clearly an emphasis. There's international pressure externally ... and there is also pressure from within.'

– VIETNAMESE INTERVIEWEE, JANUARY 2021³⁸

Both local and international NGOs have created successful public awareness and engagement campaigns that encourage civic participation in counter-environmental trafficking. In so doing, they have helped bring wildlife trafficking closer to the forefront of environmental issues and helped influence IWT patterns.

TRAFFIC, for example, has had success with their campaigns aimed at reducing consumption among businesspeople – a large demand group for traditional medicine.³⁹ Environmental groups have stated they have also found success in dampening demand for illegal environmental products by focusing their education and outreach campaigns on the younger generation, who show encouraging signs of a shifting societal attitude towards IWT. Over 60 per cent of the interviewees indicated that the youth (15–24 years old) are more aware of environmental issues than older generations, with one interviewee in Indonesia reporting that 'I've seen since 2008 a massive boom in interests [about wildlife] at all different levels ... undergraduate and PhDs'.⁴⁰ Youth are also less likely than older generations to consume illicit wildlife/environmental products, except in social situations where cultural norms dictate.

Local and national-level CSOs have an advantage in that they do not have to operate under the same constraints as INGOs, and also understand the local context. As one academic noted, in Vietnam and Indonesia '[there is a] very clear understanding that [INGOs] have to stay within very narrow bounds, or risk losing certain permissions'.⁴¹ In Indonesia, two INGOs had their licences revoked due to their criticism of the government's policies on wildlife trafficking.⁴² INGO criticisms of traditional medicine can also be construed by local people and governments as trying to push a Western agenda, and may invoke memories of colonialism,⁴³ although local CSOs partnering with INGOs may also face a similar charge.

In Vietnam, GreenViet, WildAct Vietnam, Education for Nature Vietnam (ENV) and the Hanoi UNESCO Travel Club all work to raise education on IWT. GreenViet is dedicated to educating and working with young students to address



concerns around conservation and IWT. GreenViet's Little Green Guards programme educates children about how the mountainous natural environment helps to regulate the climate in the cities they live in.⁴⁴

WildAct Vietnam's programming is targeted towards rural communities and women and is aimed at empowering women to get involved in wildlife conservation and other areas of scientific research, as well as building monitoring capacity of endangered wildlife in rural areas to support local-level engagement.⁴⁵ WildAct Vietnam has also helped the University of Vinh create a masters-level course on combating IWT.⁴⁶

ENV (the first local NGO in Vietnam to focus on nature)⁴⁷ has created YouTube videos using children to advocate for changing social norms among their parents to reduce their consumption of wildlife products. Another awareness campaign run by ENV led to a 62 per cent reduction of wildlife advertisement sales in restaurants, traditional medicine shops, retailers and bars.⁴⁸

The Hanoi UNESCO Travel Club, a trade association that numbers hundreds of member travel agencies, has partnered with TRAFFIC to increase education and corporate responsibility among its member agencies in combating the trade in illegal wildlife products.⁴⁹ One of the club's programmes (called The Chi Initiative) seeks to teach new ideas about how inner strength does not depend on owning certain objects.⁵⁰ This social-marketing campaign is aimed at business leaders to educate them on the need to transform cultural business norms surrounding the consumption of illegal wildlife products.

In Indonesia, a unique partnership between a CSO and religious leaders showed the benefits of a collaborative approach to IWT. In 2006, the Islamic Foundation for Ecology and Environmental Science partnered with the country's extensive network of Muslim scholars (ulemas) to coordinate workshops.⁵¹ These meetings helped train local environmental activists and conservationists in provinces throughout the country by helping them understand their religious responsibility to be good stewards of the environment. The workshops have helped prepare the ground for other NGOs that have come after to be more positively received in local communities.⁵²

PROFAUNA, a CSO founded in 1994 in Malang, East Java, also uses a collaborative approach in its work to disrupt IWT supply, having established a working relationship with the indigenous people of Dayak Wehe to help prevent protected forest areas in East Kalimantan from being illegally harvested or the animals poached.⁵³

Enhancing law enforcement

Most law enforcement agencies in Vietnam and Indonesia do not have a primary mission of investigating IWT, and those agencies that have responsibility for such cases are not well equipped to handle them. Over time, however, advocacy efforts and campaigns by CSOs in these countries have helped move wildlife trafficking closer to the forefront of law enforcement's priorities. CSOs have also increased the capacities of law enforcement agencies by providing expertise in identifying protected species, creating training programmes for successful prosecutions and leveraging their contacts to produce timely intelligence, including through citizen patrols of protected forests that use technology to track poachers. These efforts have contributed to a rise in arrests for IWT crimes.

In Vietnam, Save Vietnam's Wildlife operates an anti-poaching unit in the Pu Mat National Park that is responsible for organizing collaborative workshops to train forest rangers and police. The unit also utilizes the Spatial Monitoring



and Reporting Tool (SMART) to help track wildlife, patrol routes and analyze historical data on illegal activities.⁵⁴ Between 2018 (when the unit was created) and 2020, it has contributed to the arrest of 131 poachers.⁵⁵

In addition to its education work, the ENV has a dedicated wildlife crime unit that investigates illegal trading; a hotline used to source information from the general public relating to potential IWT; and a national wildlife crime database that collects information on online advertisements for illicit products.⁵⁶ ENV provides investigative expertise on wildlife to law enforcement personnel and helps prosecutors with the legal framework surrounding the new laws.

In Indonesia, the Sumatra Rainforest Initiative – via its Forest Crime Initiative – gathers information on illegal logging and poaching in order to facilitate law enforcement.⁵⁷ The WCS, an INGO active in over 60 countries, has been present in Indonesia since the 1960s and works throughout the country, especially in Sumatra, Java, Sulawesi, Nusa Tenggara and Maluku. In 2015, WCS–Indonesia established a policy unit, which works with the Indonesian government to implement CITES initiatives and provide training tactics to law enforcement to better recognize and address wildlife and environmental crimes.⁵⁸ Both the Sumatra Rainforest Initiative and WCS–Indonesia have a formal contact system the general public can use to notify the NGOs of any suspicious activity.⁵⁹ In Vietnam, the WCS was instrumental in creating an IWT course within Vietnam’s National Police Academy.⁶⁰

Pressure campaigns

CSOs are also vigilant in policing environment crime involving state actors. While not directly related to fighting illicit trade, the Save Aru movement is a good example of the power civil society-led campaigns can have in prompting government action. Save Aru was a grassroots campaign that began in 2013 when activists protested against a corporation that had illegally gained permits to turn the small Aru Island, which hosts immense biodiversity, into a sugarcane plantation.⁶¹ The movement transitioned to social media with people around the world taking pictures holding a #SaveAru sign. Indonesian celebrities joined and music videos were made to support the island’s residents. The pressure mounted on the government, eventually leading to the plan to be halted, and the politician behind it was jailed for corruption.⁶²



CHALLENGES FACING LOCAL CIVIL SOCIETY ORGANIZATIONS

Restrictions on speech, a lack of protection from prosecution and uncertain funding are some of the many challenges that face CSOs in their work against IWT. This hinders their effectiveness and creates an antagonistic dynamic between civil society and state over what should be perceived as a common and shared problem: the preservation of the natural environment against criminal activity.

Vietnam

In 1998, Vietnam passed a law allowing people to participate at the local level within state-owned enterprises, agencies and communities,⁶³ intended as a means of providing transparency and accountability for local government. In 2003, another law called Grassroots Democracy was passed that became the basis for formal community-based organizations (CBOs) and other NGOs.⁶⁴ By 2005, there were over 140 000 CBOs working in Vietnam in the areas of natural resources, sustainable economic development and knowledge dissemination, along with 3 000 cooperatives (agriculture, fisheries and construction), over 1 000 NGOs and 200 charities.⁶⁵

While there have been significant improvements in the ability of CBOs, NGOs, INGOs and citizens to participate in civic engagement, public discourse is still heavily circumscribed, with the Vietnamese government banning all associations or expressed viewpoints that disagree with party policies or that constitute political opposition.⁶⁶ The government's censorship on media and news dissemination has caused the country to be ranked 175th out of 180 countries worldwide on the World Press Freedom Index.⁶⁷ In 2016 the UN High Commissioner for Human Rights urged Vietnam to repeal a law known as Article 88, which criminalizes speech that the government deems as propaganda.⁶⁸

Environmental advocates who post online do so at great personal risk. In 2019, a shrimp farmer was sentenced to six years in jail for criticizing the government on Facebook about environmental policies.⁶⁹ A prominent journalist, Pham Doan Trang, was arrested in October 2020 for writing about the country's environmental policies related to land rights, and faces up to 20 years in jail if convicted.

Indonesia

Following a change of government in 1998, civic space and the guarantee of basic freedoms in Indonesia have dramatically improved. The Indonesian Constitution and the ratification of the International Covenant on Civil and Political Rights guarantees the rights to freedom of expression and association.⁷⁰ Civil society is relatively active in Indonesia, with four out of five Indonesians having offered assistance in the form of money, goods or labour to CSOs, while over half have been a member of at least one.⁷¹ CSOs are controlled by the Ministry of Law and Human



Rights for those with legal status, and the Ministry for Home Affairs for those without.⁷² In August 2017, there were a reported 344 039 CSOs in Indonesia.⁷³

Despite this greater freedom, some policies have been exploited to silence criticism and criminalize journalists, such as amendments to the Law on Mass Organization (Perppu No. 2/2017) and the defamation clause of the Electronic Information and Transactions Law.⁷⁴ The World Press Freedom Index ranks Indonesia 119th out of 180 due to imprisonment of journalists, restrictions of access to media during times of tension and the abuse of anti-blasphemy laws by authorities.

The pandemic also saw more restrictions being imposed on civil society in Indonesia. In October 2020, an Omnibus bill was passed. Intended to be a job-creation law, critics argue that it deregulates the mining and forest industry by reducing civil society's participation in the land-permitting process. The new policy stipulates that only those directly affected by the land use are allowed to challenge the permits, thus excluding NGOs and conservation groups from speaking on behalf of small farmers and indigenous people.⁷⁵

It also remains true that NGOs face structural and reputational issues of their own. Activism in Indonesia is a mostly middle-class, urban phenomenon that for the most part struggles to connect with marginalized groups.⁷⁶ NGOs are mostly based in large cities, detached from the lived experiences of people of other socio-economic classes, including poor, rural communities.

Furthermore, the operations and programming of many Indonesian NGOs are hampered by limited financial, human, technical and infrastructural resources.⁷⁷ NGOs tend to rely on and compete for international funding to survive.⁷⁸ Also, pressure from INGOs has caused the European Union countries and the United Kingdom to impose strict import standards on palm oil products from Indonesia. The palm oil industry employs 17 to 20 million people but is also the major cause of deforestation in the country. The increased scrutiny has made exporting palm oil more difficult. For this reason, NGOs are sometimes viewed sceptically or even as tools of Western propaganda.⁷⁹ To address the social gap, some CSOs are constructed on a broad membership base in order to increase accountability and organizational diversity. This 'bottom-up' approach has been successful for organizations oriented around environmental issues.



CONCLUSION AND RECOMMENDATIONS

*Education works best hand in hand with policy and law enforcement, any one of them on their own is ... useless.*⁸⁰

IWT poses a plethora of challenges to law enforcement in Vietnam and Indonesia, especially as many agencies lack the necessary resources to tackle the problem. In both countries, CSOs have shown themselves to be effective and useful in addressing a range of ‘capability gaps’ across the counter-IWT spectrum, from educating would-be poachers on the supply side to running campaigns aimed at reducing consumer demand. Specialized CSO wildlife crime units have been able to provide law enforcement agencies with valuable intelligence to pursue and prosecute offenders, and pioneered ways of monitoring the burgeoning online trade that could point the way for law enforcement efforts in future.

Yet CSOs and NGOs do not operate in a political vacuum. They face several challenges in their local contexts, both internally and externally. To bolster their effectiveness further, this report recommends action in the following three key areas: education, partnerships and intelligence gathering.

Recommendations

Broadening education

Educational campaigns should be designed to ensure a multi-faceted approach. The demographics of people who consume illicit products are diverse and policies aiming to reduce consumption must match this diversity. Consumers can be inhabitants of rural villages, users of traditional medicines, businesspeople, tourists from other countries or wealthy individuals looking for rare products. Thus, no single campaign can encapsulate an effective message for everyone. Illegally trafficked products can also benefit from having individual campaigns, as each product presents individual difficulties and special circumstances surrounding their consumption. Pushing IWT higher up the global agenda is also vital, and creative approaches can reach large audiences: the INGO Save the Rhino, for example, recruited international celebrities to bring worldwide attention to rhino consumption in Vietnam. It is also important that the message delivered to local indigenous communities is not one of pure prohibition, but that civil society engages to help them find economic alternatives to using endangered local species.

Forging partnerships

INGOs should continue to work to establish strong partnerships with local CSOs. Through these partnerships, INGOs can provide information to national or local-level CSOs who have more credibility and are better equipped to frame issues to local audiences in understandable ways that do not raise the spectre of environmental colonialism. With the safety of local-level organizations in mind, CSOs are better placed to design and deliver communication campaigns that are more likely to resonate among locals, hence increasing the chances of truly educating the public



and helping drive policy decisions. This strategy is to allow for INGOs to stay in the background in support of local CSOs and away from credit claiming on successful outcomes, because the emphasis should be to bolster the reputations of local CSOs and governments.⁸¹ Where INGOs do operate on the ground, they should consult with local NGOs before implementing new campaigns or plans to take local traditions into consideration.

As CSOs have done with law enforcement, they should also develop cooperative partnerships with local politicians with the intention of reviewing key policies that are often circumvented by organized crime actors. These partnerships can help close information gaps and loopholes trafficking enterprises most often use. In Indonesia, for example, most trafficking laws pertain only to animal species found within the country's borders and do not apply to species that come from other countries.⁸² As mentioned above, it is also legal in Indonesia to post IWT products for sale on social media.

Enhancing local politicians' understanding of the effects of IWT on their communities would also be valuable. Marshalling evidence of changing cultural attitudes towards IWT, such as a 2020 study conducted in Hanoi in which a majority approved of bans on certain animal meats, and presenting such evidence to politicians could help in this regard.⁸³ In Indonesia, collaborating with community leaders could also help guide legislatures into strengthening national laws in line with international standards.

CSO partnerships with academic institutions and grade schools, business and government agencies to create jobs and/or educational programmes in the areas of environmental conservation can also further inspire youth involvement over time. An example of this is the 2019 partnership between Vietnam's University of Vinh and WildAct Vietnam to create a masters course in wildlife trafficking after young people showed interest in learning more about environmental conservation.⁸⁴

Intelligence-gathering systems and protections

Hotlines are crucial intelligence-gathering tools for local NGOs and help inform where their resources are needed. Currently, various CSOs in both countries operate hotlines via phones or websites, but in some cases are understaffed and none are centralized. Implementing a standardized intake method would allow for the hotlines to be replicated across more CSOs, which would also allow for the centralized comparison of data, which would in turn bring more detail to trafficking trends. Hotlines should be in numerous languages to be accessible to local communities and tourists alike. Also, adequate funding for full-time staff would create a reliable network for information gathering that communities can depend on. Active promotion of hotlines is also important to help improve their reach: campaigns promoting hotlines helped one local Vietnamese NGO grow from receiving one or two calls a week in 2016 to 10 or 15 a day in 2021.⁸⁵

Anonymity for people reporting instances of state involvement in IWT is essential to ensure that informants are protected from corrupt law enforcement and other members of government, as those who speak out against government actors are likely to face reprisal in both Vietnam and Indonesia. Without more protections for civil society and whistle-blowers, it will be hard to hold criminal and corrupt government actors accountable. In this light, it is important for CSOs in Indonesia to highlight how the new Omnibus Law is detrimental to civil engagement.

Given the shift to online IWT trading, resources should also be dedicated to enhancing and expanding the use of technology, such as data-scraping software that can monitor online sales and provide timely intelligence to law enforcement.



The illegal trade of endangered animals and environmental commodities shows no sign of abating. Highly biodiverse countries such as Vietnam and Indonesia remain magnets for criminal actors determined to exploit the environment for financial gain. In this context, an all-of-society response is needed, and domestic CSOs are key to raise awareness among consumers of illegal products and the wider society as well as to support law enforcement against environmental crime.



ANNEX:

INTERVIEWEES

	VIETNAM	
<i>Interviewee</i>	<i>Date</i>	<i>Organization Type</i>
V1	January 2021	Local environmental NGO
V2	January 2021	Environmental INGO/Consultant
V3	January 2021	Environmental INGO
V4	January 2021	Local journalist
V5	February 2021	Local law enforcement
V6	February 2021	Environmental INGO

	INDONESIA	
<i>Interviewee</i>	<i>Date</i>	<i>Organization Type</i>
I1	February 2021	Local environmental NGO
I2	February 2021	Environmental INGO
I3	February 2021	International journalist
I4	February 2021	Local environmental NGO
I5	January 2021	International law enforcement
I6	February 2021	International academic



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