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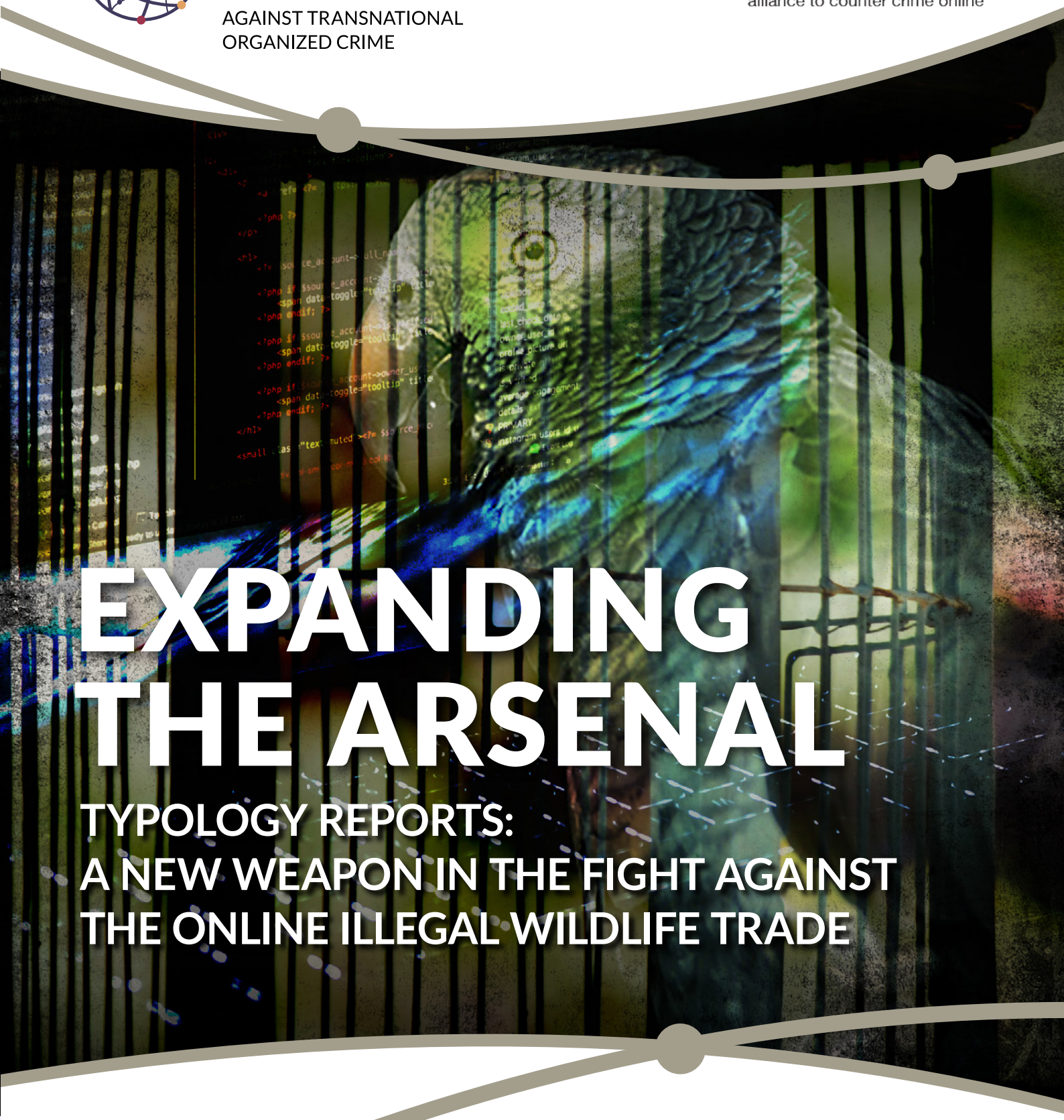

EXPANDING THE ARSENAL

TYPOLOGY REPORTS: A NEW WEAPON IN THE FIGHT AGAINST THE ONLINE ILLEGAL WILDLIFE TRADE

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This report was produced in partnership with the Alliance to Counter Crime Online (ACCO). ACCO is a programme of the Centre on Illicit Networks and Transnational Organized Crime, comprising non-profit organizations, academics and citizen investigators who share a commitment to fighting the growth of serious crime on the surface web. They conduct investigations and research into a range of illegal sectors and provide evidence to law enforcement agencies and policymakers with the aim of making the web a safer place.

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Market Monitoring and Friction Unit

The Market Monitoring and Friction Unit (MMFU) is a team within the Global Initiative Against Transnational Organized Crime (GI-TOC) dedicated to monitoring online marketing of endangered wildlife species and working towards innovative, effective strategies for disrupting them. The unit collaborates with civil society organizations and mandated authorities to shut down online illicit wildlife markets.

Websites on the open web – sites that people can access and use every day – host some of the biggest online markets for endangered species.[1] Evidence of wildlife crime is widespread across the internet and private platforms, and law enforcement agencies are either unwilling or unable to mount an adequate response.[2]

This mirrors a broader challenge in combating cyber-enabled crime, namely that criminals are on the web, but the police are not. Reasons for this include responses to cybercrime being under-resourced, a lack of explicit mandates to address it and the absence of investigatory authorities. This situation manifests unequally around the world. While rich countries have the largest internet-using populations, they also have the most resources to combat on-line harms. The greatest challenges are found in developing countries with the least resources for regulating cyberspace or implementing strategies to combat cybercrime.

Within this broader crisis, the online trade in endangered species is easily overlooked, leaving a gap in the global response that allows wildlife traders to openly seek customers online, market goods, conduct transactions and stimulate demand. This contributes to the wider problem of the illicit wildlife trade, which can lead to extinction of species and heightened risk of outbreaks of zoonotic diseases; it also encourages corruption while enriching highly organized criminal networks.

The MMFU's investigation into the illicit online trade in endangered species grew from the recognition that innovative responses were needed to combat this type of crime. The unit's aim is to make the open web a space where there are fit-for-purpose laws protecting us – and endangered species – and that they are respected in letter and spirit.

With 'community tool' reports such as this one, the MMFU can share its knowledge with the community responding to the harms caused by illicit online wildlife trade. It is hoped that such tools will help to scale the lessons learnt and multiply the number of effective interventions to rein in illicit wildlife markets.

Summary

For several decades, crime typology reports have been successfully applied in the financial industry to assist bank analysts and law enforcement agencies with recognizing incidences of money laundering and terror financing. The success of these reports in the fight against financial crimes has led us to believe that they have the potential for a broader application, specifically in the realm of the online illegal wildlife trade where they could be specifically adapted to assist in the development of better means of detection and more effective interventions.

The Global Initiative Against Transnational Organized Crime (GI-TOC) and the Alliance to Counter Crime Online (ACCO) collaborated to analyze common characteristics among social media posts advertising exotic pets and illegal wildlife parts to determine if typologies could be developed to assist law enforcement, tech firms, the financial industry and other civil society organizations in detecting and tackling wildlife trade offenders in the online sphere and specifically on social media platforms.

This work led to the development of this community tool that explores the history of typological reports, examines how they may be used in the counter-wildlife-trafficking sphere and provides a sample typology report that explains the different sections and information required. It is intended to assist institutions and organizations researching and responding to the illegal wildlife trade by giving them a template to report their data in a clear and succinct manner that highlights the most important information for responders.

A rescued Chinese pangolin in Vietnam. © *Linh Pham/Getty Images*

Ground Zero, on the first anniversary of the 11 September terrorist attacks in New York City. © *Jose Jimenez/ Primera Hora/Getty Images*

BACKGROUND OF TYPOLOGY REPORTS

Typology reports are regulatory tools that first emerged in the 1990s to describe and explain the methods, techniques and instruments used by illicit actors in money laundering schemes with the belief that distributing such information would lead to an increase in global awareness and thus earlier detection.[3] Following the terrorist attacks on 11 September 2001, this effort intensified and its scope broadened to include combatting the financing of terrorism since these financing techniques were nearly identical to those associated with money laundering activities.[4]

Typology reports in the counterterrorism and financial-crime space have been typically produced by governments, as well as international monitoring bodies such as the Financial Action Task Force or Egmont Group of Financial Intelligence Units. Banks and other financial institutions use them to monitor their systems for risk and remain compliant with the laws, sanctions regimes, international agreements and treaties governing terror financing and financial crime. Trends in typological reporting also provide policymakers and law enforcement authorities with up-to-date empirical data they can use to develop strategies to combat these emerging threats. The International Monetary Fund states that the goals of these reports include:

- Protecting the integrity and stability of the international financial system.
- Cutting off the resources available to terrorists.
- Making it more difficult for those involved in crime to profit from their criminal activities.[5]

Although there are no publicly available figures detailing the success rate of these reports, there have been qualitive case studies published detailing a range of instances where the use of typology reports led to the identification and prosecution of those involved in money laundering or terrorist financing.[6] These reports have also led to the identification and closing of regulatory gaps that had previously been exploited for illicit means. One such example is a case involving a money laundering scheme associated with the diamond trade in Israel. As part of its investigation, Israel's Money Laundering and Terror Financing Prohibition Authority conducted a comprehensive strategic analysis of the diamond industry, including the identification of vulnerabilities and typologies. The analysis of databases to identify money laundering and terror financing was recognized as one of several important takeaways from the case.[7]

The Egmont Group, which is an international organization comprising national financial intelligence units, has 167 member countries, a number that has steadily increased since its founding in 1995. In 2021, the group published a report detailing the top 117 cases between 2014 and 2020 in which investigators relied on information shared by other member states. These cases were solved through the collection of piecemeal information drawn from reports of suspicious activity or transactions, which may have been overlooked by criminal investigators. The compiling of such information led to the unravelling of multimillion-dollar financial crimes that spanned continents.[8]

Such successes have led international bodies such as the UN, the Council of Europe[9] and some civil society organizations to produce typological reports for use in other crime sectors where there is a convergence with money laundering, such as human trafficking,[10] environmental crime[11] and the illegal wildlife trade,[12] in addition to creating reports on emerging criminal trends resulting from the COVID-19 pandemic.[13] Although there have been challenges reported related to the lack of accurate information on illicit financial flows due to incomplete typologies – for example, with environmental crimes – such problems are expected to resolve themselves as more data is gathered resulting in a big picture understanding of these illicit flows.[14]

These documents provide a basis for compliance professionals and moderators to develop indicators or 'red flags' to look out for when performing their work. Taken on their own, these indicators may not always lead to a reasonable suspicion that illegal activity is occurring, but they can nonetheless serve as useful controls to trigger enhanced due diligence and further monitoring.

Suspects of online illegal wildlife trading are questioned by cybercrime police personnel, North Sumatra, Indonesia.
© Aditya/NurPhoto via Getty Images

TYPOLOGY REPORTS AND THE ILLEGAL WILDLIFE TRADE

The rapid growth of the internet since its invention more than 30 years ago has resulted in a patchwork of national regulations that were established independently, as lawmakers were unable to predict the trans-jurisdictional nature of a now highly interconnected world. Although policymakers and law enforcement agencies in the developed world have made significant progress in their attempt to keep pace with these technological advances, there are still shortfalls in funding and resources, which hampers enforcement activity. Developing countries are especially vulnerable as the fight against cybercrime receives limited resources due to being a low political priority.[15] This problem is further compounded by the transnational and fragmented nature of the online illegal wildlife trade, which makes it especially challenging to identify the markets or actors most worthy of law enforcement action. Along with the absence of specialized police units to combat this trade, an enforcement gap has formed, making intervention by civil society organizations necessary.

The fact that illegal wildlife traders have begun utilizing surface web platforms to sell their products is evidence of the poor detection and enforcement capacities of law enforcement agencies, and the insufficient internal controls of the private companies that run the platforms. Because the online illegal wildlife trade is a low political priority and the terms of service of some social media platforms hamper police investigations, criminals are online but the police are not. Wildlife crime therefore offers high rewards with little risk. Although major social media platforms explicitly ban the advertising, selling and buying of illegal wildlife, these companies have habitually under-resourced the problem, relying instead on national laws that give tech platforms immunity for user-generated content, even if that content is illegal.

However, there is cause for cautious optimism. National and international law enforcement responses to wildlife crime are improving, despite still being hampered by the crime's cross-border nature, and the work of civil society organizations over the past two decades has revealed the extent to which the surface web has become an important and fast-growing channel for the marketing and sale of endangered species. This research has recently been supplemented by considerable advocacy work aimed at compelling big tech companies to act against illegal wildlife traders on their platforms. One outcome is the Coalition to End Wildlife Trafficking Online, which consists of 47 companies accounting for more than 11 billion user accounts globally.[16] Although the Coalition failed to meet its lofty goal of removing 80 per cent of wildlife crime from social media platforms by 2020, their 2021 progress update reported that member companies blocked or removed more than 11 million online posts associated with the illegal wildlife trade.

Though much work remains, and tech companies have not granted independent monitors access to the content they have allegedly removed, the decision by these platforms to actively take down wildlife crime content is progress upon which further action can be built. As with money laundering and terrorist financing, where weaknesses in enforcement and gaps in regulation are exploited for criminal ends, online illegal wildlife traders exploit gaps and weaknesses in the detection and enforcement abilities of internet platforms. It is in this sphere that typology reports can be adapted to assist with efforts to detect and curtail illegal wildlife traders online.

Typologies are one potential tool to improve responses to the online illegal wildlife trade and establish a regular flow of information from wildlife experts to multiple tech platforms. Because of the unique nature of wildlife trafficking, tech companies will require help to understand the evasion techniques used by illegal traders. These include using emojis, hashtags and text within images to evade automated word searches. Typologies can also assist law enforcement, policymakers and the financial sector in understanding where to focus their resources. As in other crime sectors, wildlife typologies could utilize case studies and real-life examples to demonstrate how wildlife criminals use tech platforms to market their products, negotiate with customers and accept payments.

Since it is unlikely that a single tech firm or law enforcement agency could maintain comprehensive knowledge of the planet's wide range of flora and fauna and their associated illicit trade dynamics without incurring considerable cost, wildlife typology reports produced by a pool of experts will allow tech platforms to combine their resources to efficiently track methods, techniques, schemes and instruments used by online wildlife offenders. The tech industry and governments could fund civil society organizations (including conservation and animal welfare groups), academics and animal enthusiasts that monitor the online illegal wildlife trade to produce the reports. These groups hold the greatest depth of knowledge and range of data, and can bring scientific expertise that is critical to accurately identify the many species trafficked online.

Although the regulatory and legal frameworks around online illicit trade may change, it will probably remain crucial to make private tech companies liable for hosting illegal content so they are incentivized to moderate their platforms. This guidance is offered in the hope that such actors may use it to inform and support private platform moderators and law enforcement efforts to understand the activity, profile bad actors and take appropriate action.

Parrots rescued from being sold in Narathiwat, Thailand, October 2018.
© Madaree Tohlala/AFP via Getty Images

COMPILING A TYPOLOGY REPORT

Typologies are produced from multiple sources to allow for an in-depth analysis of developing trends and behaviours that may not be readily apparent from just viewing one or two social media posts. Typology reports aim to present the data in a clear and succinct manner to allow internet platforms, law enforcement agencies and policymakers to strategize based on a big-picture view. The changing and clandestine nature of the illegal wildlife trade means that producing typologies is not always easy and thus requires expertise in the subject.

Note that the sections below, once completed, will need to be regularly updated to account for the ways illicit actors routinely adjust their behaviours, methods and capabilities in response to obstacles introduced by interdiction (or online, private-sector moderation) and as new technologies emerge. For this reason, there needs to be a regular flow of typological reports to ensure that enforcement officials have up-to-date knowledge of these evasive tactics.

The GI-TOC and ACCO have used the five sections below to present their research while compiling a typology report for social media platforms. These were developed through discussions with social media platforms and law enforcement agencies as well as research to ensure that they are relevant to the intended users of the typology. These users' needs may change over time as online traders adapt their methods in response to detection and enforcement actions, and so sections may need to be amended or added.

Summary and key findings

The aim of this section is to sum up the main findings of the typology report so that users can ascertain whether it contains information relevant to their work. The main points to include are the species in question, an overview of the illicit flow, relevant national and international legislation, and the actions taken by illegal traders to evade detection.

The key findings should be objective and relevant to policymakers, moderators or law enforcement agencies. They should include:

- any tell-tale signs identifying a trade as being potentially illegal,
- new tactics used by the traders and,
- any changes to our understanding since the last typology was published.

Legislation and associated challenges

This section details the relevant national and international legislation for a particular trade. There will likely be several different jurisdictions involved in a single trade; for example, in the mock-up report below (see Appendix), the trade stretches across South America to Asia. Both national legislation and international treaties, such as the Convention on International Trade in Endangered Species (CITES), should be discussed in this section along with any relevant cyber legislation.

Any legal gaps in wildlife legislation that affect the ability of law enforcement to pursue a prosecution or that may be exploited to facilitate the illegal trade should also be discussed. Any barriers to international cooperation – such as legislative gaps or poor drafting that inhibits law enforcement agencies from gathering and sharing evidence with foreign partners – should also be discussed.

Illicit supply chain

This is the primary section of the typology, and it details the known illicit flow from the procurement stage through export, import and finally retail. As the illicit product moves through the supply chain, both the sellers and intended buyers will change as will the associated risks. Different techniques are used at each stage, and so the procurement, export, import and retail stages should all be discussed separately.

Detection and enforcement challenges

This section may require frequent updates as buyers and sellers adapt their operations in response to moderation or enforcement activity, or to increase their reach. Criminals not only use code words to disguise illicit activity but also change these terms frequently, meaning that platform moderators and law enforcement agencies need to keep abreast of the changing terminology.

Due to the close ties between the illegal wildlife trade and money laundering activities, details about payment methods, including the companies and banks involved,

should be included to assist with work conducted by financial institutions to map the illicit financial flows associated with the trade.

If evidence emerges that this trade converges with other crimes, those details should be included in this section as well.

Media coverage and public awareness

Since the business model of social media companies and some internet platforms depends on the selling of advertisement space on their sites, the value of such space is linked to the number of users viewing those advertisements. Negative publicity, either directly towards the platform or at activities the platform is enabling, can affect these user numbers and therefore the revenue of the platforms.

The typologies include a section that lists media coverage and social media activity reporting on the trade of specific species that present a public relations risk to the platform, with the belief that activity that may directly affect the public reputation and profitability of the platform may generate a response.

Recommendations

This section should be a short, bulleted list of recommended actions to be taken by internet companies and law enforcement agencies based on the report's findings.

Suspected illegal wildlife traders in custody, East Java, Indonesia.
© Juni Kriswanto/AFP via Getty Images

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APPENDIX: SAMPLE TYPOLOGY REPORT

Below is a mock-up of a typology using an imagined illicit trade in 'shiny foxes'. (Note that 'shiny foxes' do not exist – this species has been invented for the purpose of illustration.) It is important to highlight that this is a sample: the information available for an actual species will vary, and so, in a real typology, not every section will include the same level of detail.

ANALYSIS OF THE USE OF SOCIAL MEDIA PLATFORMS IN THE ILLEGAL TRADE OF SHINY FOXES AND THEIR CONSTITUENT PARTS

Summary and key findings

Shiny foxes have experienced chronic overexploitation in the last 15 years due to habitat loss and widespread harvesting of the animal for its skin and bones, which are used to create luxury handbags and traditional medicine. This has led to population collapse in the South American range states and significant harm to the local communities living in the procurement sites who are dependent on the natural environment for their livelihoods.

The species is classified as 'endangered' on the International Union for the Conservation of Nature's Red List of Threatened Species and listed in Appendix 1 of CITES, meaning that international trade in this species for commercial purposes is prohibited by all CITES parties. In accordance with their responsibilities to CITES, national governments have legislated against the procurement and trade of shiny foxes in domestic legislation, though with variable success regarding enforcement.

The illegal trade in shiny foxes remains rampant on the surface web and is predominantly hosted on social media platforms, particularly at the retail phase of the supply chain. In addition to causing environmental and ecological harm, the illegal wildlife trade in shiny foxes is known to fuel corruption, which leads to instability at local and national levels.

The aim of this report is to give internet companies, law enforcement agencies and policymakers an overview of the illicit supply chain for the trade in shiny foxes and their parts. It also aims to highlight the techniques used by traders to disguise their operation while noting possible enforcement strategies to increase the effectiveness of moderation by social media platforms, which are responsible for policing the content available on their servers.

Key findings

- There appears to be a significant trade in shiny foxes and their parts to meet the demand of consumers of luxury products and traditional medicines.
- The procurement countries have been identified as Brazil and Peru; Pakistan and India are transit countries as the products travel to the consumer countries of Hong Kong and Vietnam.
- The early stage of the illicit flow appears to be more dependent on established relationships while the later stages are more dependent on social media platforms to sell to consumers.
- There appears to be a concerted effort by sellers to protect themselves from moderators and automated surveillance by using emojis, hashtags, code words and images.
- Text in posts or embedded in the photo/video may name the seller and/or provide contact details.
- Date stamps and metadata in still and video images, and background signage visible in posted images of stock, sometimes show the date or name of the seller.
- Cargo tracking codes visible on transport boxes or in images can reveal the storehouse.
- Comments in posts below images or videos may provide details about the trade that may not be apparent from the advert alone.
- The illegal trade in shiny foxes intersects with counterfeit medicine and medicinal hoaxes.
- Price negotiations are redirected to private messaging channels, but in some markets, buyers appear to use services like Western Union or informal payment systems such as hawala.

Legislation and associated challenges

'Wildlife crime' refers to the taking, trading (supplying, selling or trafficking), importing, exporting, processing, possessing, obtaining and consumption of wild flora or fauna, including timber and other forest products, in contravention of national or international law. Increasingly, wildlife criminals use image-based social media and other surface web platforms to facilitate their illicit activities.

The transnational nature of the online illegal wildlife trade can present jurisdictional challenges since laws vary across range, transit and consumer states. This section outlines national and international laws that prohibit the trade in shiny foxes and highlights associated legal challenges.

National legislation

Besides Vietnam, all countries along the identified illicit supply chain outlaw the harvesting and transport of shiny foxes through national legislation. Figure 1 outlines the relevant legislation in each of the countries where the trade in shiny foxes has been identified. The effectiveness of this legislation varies considerably between jurisdictions, and in most regions, law enforcement lacks capacity to track wildlife offenders online.

COUNTRY	NATIONAL LEGISLATION
Brazil	Act No 9.605. Regulating Criminal and Administrative Penalties relating to behaviour and activities harmful to the environment and sets forth other provisions.
Peru	Forest and Wildlife Law, No 29763
Pakistan	The Pakistan Trade Control of Wild Fauna and Flora Act, 2012 (CITES Law)
India	The Wild Life (Protection) Act, 1972
Vietnam	No applicable legislation
Hong Kong	Protection of Endangered Species of Animals and Plants Ordinance, Cap.586

FIGURE 1 National wildlife legislation in target countries.

Since social media is widely used in trafficking and consumption countries, the use of social media to advertise and facilitate the trade carries no de facto legal liability. Therefore, the only risk associated with using a social media platform is being detected by platform moderators, which, at most, results in a permanent suspension from the platform. There is little evidence that such suspensions are effective since traders can create new profiles using new details.

International legislation

Shiny foxes are listed in Appendix 1 of CITES, meaning that any international trade of wild-sourced shiny foxes for commercial purposes is prohibited. All six target countries are signatories to CITES and thus have treaty obligations to comply with the convention's rules and requirements. In addition to placing restrictions on the physical trade of endangered wildlife, CITES also recognizes that social media and the internet more broadly have facilitated communication and commerce between individuals and crime networks that advertise and arrange sales of endangered wildlife. CITES defines the online illegal wildlife trade as:

> Crime involving any wildlife specimen, enabled or facilitated using information and communication technology networks or any application in the digital world, including inter alia the public (clear) web, the dark web, online marketplaces, social network platforms, instant chat applications, peer to peer networks or email services.[17]

Despite publishing a 2019 resolution recommending that all parties develop mechanisms to monitor the online illegal wildlife trade, because CITES depends on nations complying with the agreements, there has been little progress made in the source, transit and destination countries for shiny foxes.[18] The 2019 resolution also recommended that national governments engage with online platforms to develop policies aimed at preventing their use for the illegal wildlife trade while encouraging them to inform their users about the illegal trade. Pressure from national governments and civil society organizations has led tech companies to develop policies to respond to and reduce the illegal trade of wildlife on their platforms; however, there still needs to be greater enforcement to ensure compliance with CITES.

Illicit supply chain

Illegal wildlife traders use social media platforms to facilitate and enable the illicit flow of shiny foxes from range states in South America, through transit countries and finally to the consumer markets in Asia. The techniques used by the traders vary at each phase of the supply chain. Figure 2 summarizes the four phases as the shiny foxes are trapped in their range states and then transported across the world to consumer markets, where they reach the final retail phase of the supply chain.

The different stages of the illicit flow are explained in more detail below. This description is based on past discoveries of illegal traders that have provided valuable insights into current techniques they use to carry out their activities undetected. This section also explains the difficulty of determining the illegality of trades that are detected.

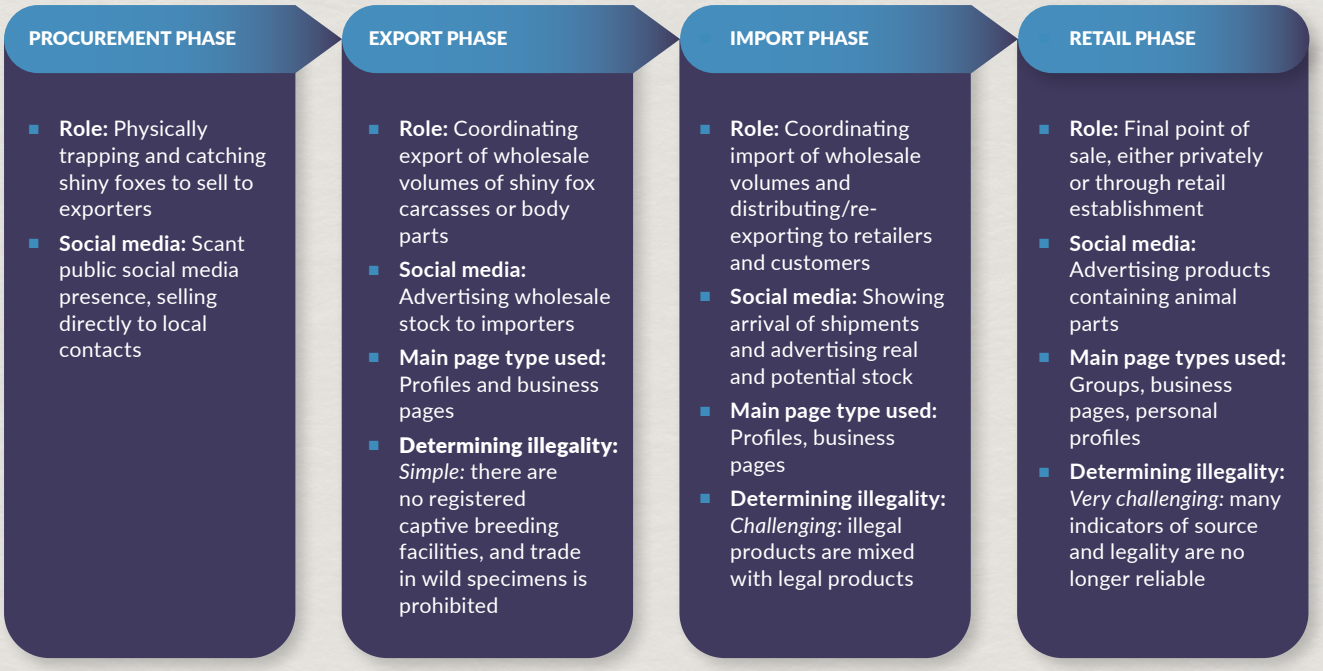


FIGURE 2 Illicit supply chain of shiny foxes.

Procurement phase

There is scant evidence that trappers of shiny foxes utilize social media to market animals, but sources in law enforcement in range states say that trappers do use messaging services to communicate with and arrange sales to exporters.

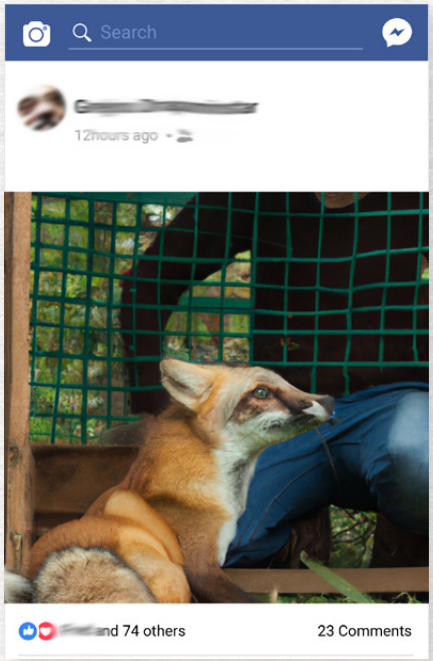
The foxes are trapped in the wild by experienced poachers who either kill the animals themselves or transport them live in cages to be slaughtered. Their skins and bones are then separated from the carcasses before being processed, which includes cleaning and curing the pelts and crushing the bones into a rough powder to make them easier to transport.

Export phase

Exporters use their personal social media pages to advertise stock, typically in Spanish and Portuguese. They often advertise other species as well, including some mammals, birds and reptiles that are regulated by CITES's Appendix 1. Traders have adopted the following strategies to obfuscate their activities:

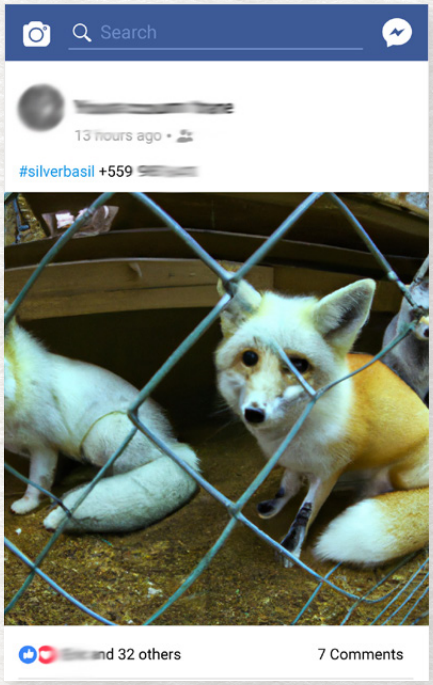
- Posting generic images of foxes on their public-facing page and operating private social media groups to advertise the product for sale more openly.
- Telling those who inquire about animals for sale to send them a direct message.
- Posting on social media stories available only to friends and only visible for 24 hours.

Determining legality is relatively simple at this stage in the supply chain as international trade in wild-sourced specimens in prohibited, and there are no captive breeding facilities registered with CITES in range states that would be permitted to export.



This photograph was encountered during a manual search of profile pages on Facebook in March 2021. It shows a poacher in Peru next to a shiny fox in captivity. No details about price or contact details were available, suggesting that the intended buyers were already in contact with the seller. The picture was removed two days after detection but reappeared the following week, suggesting that it is a generic image used by the exporter to advertise the availability of their product.

TYPOLOGY 1 Wildlife exporter in Peru.
Photo: AI-generated image from OpenAI



Captured shiny foxes in cages. The image was discovered on a Facebook profile alongside other images depicting the illegal wildlife trade. It is unknown whether the shiny foxes are exported alive or if they are culled before export. The image was online for nine days and has not reappeared. Attempts to contact the seller were unsuccessful, suggesting that they only communicate with known individuals.

TYPOLOGY 2 Wildlife exporter in Brazil.
Photo: AI-generated image from OpenAI

Import phase

Importers in East Asia are directly involved in bringing in wholesale volumes of shiny fox pelts and bones using social media platforms to connect with both the exporters in South America and retailers in their country. They often finance the export phase and may also operate as direct sellers to pharmaceutical manufacturers or producers of fur clothing. Importers using social media have been identified in China, Thailand, Malaysia and Vietnam, with growing activity in the Indian subcontinent aligning with rising demand for shiny fox due to a widespread belief that its bones can cure COVID-19.

Importers tend to use business pages to advertise wholesale shipments of shiny fox. Actors at this level of the supply chain usually also import and advertise other wildlife from around the world, including reptiles and birds, either legally, illegally or both, and it can be difficult to determine whether the animals were obtained legally. While there has been a decline in the public activity of some importers since 2016, there has been far less of a decline at the export phase, possibly indicating that moderation efforts are less focused on this phase or that traders perceive lower risks of enforcement. Importers may use the following strategies to promote trade and obfuscate their activity:

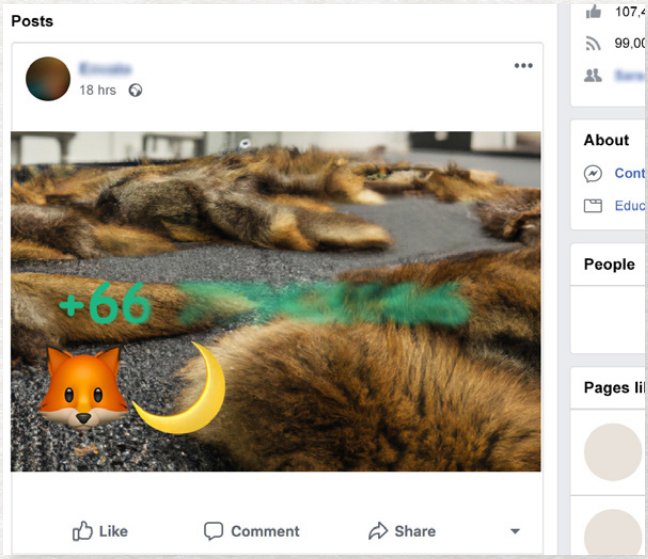
- Posting about recently arrived stock publicly on timelines but not explicitly offering it for sale.
- Telling those who inquire about animals for sale to send them a direct message.
- Embedding their phone number in videos but not in text.

Determining legality is more challenging at this stage in the supply chain because importers may also promote large quantities of legally acquired or imported specimens, such as legally acquired English fox pelts. Importers sometimes create multiple pages linked to the same individual or business, possibly to evade moderation.

However, the following may lead to the identification of illegally imported shiny fox pelts:

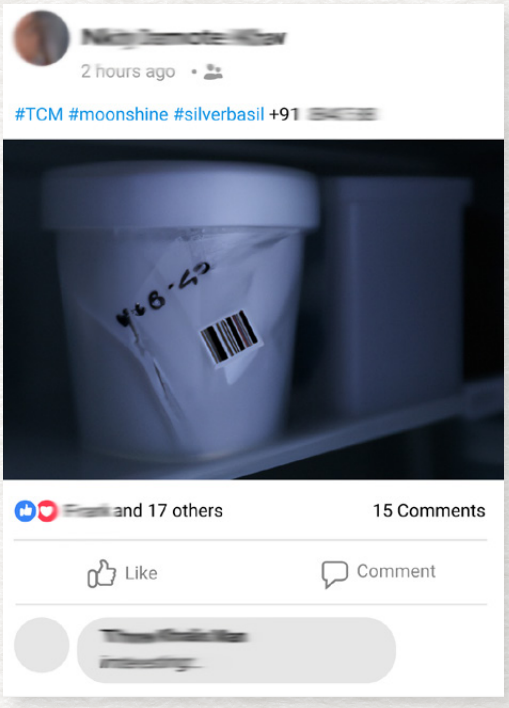
- The bones are usually disguised as chalk, concrete or flour and transported in containers also containing these materials.
- The pelts are imported alongside legally acquired pelts, e.g., English fox pelts. The shiny fox pelts usually show signs of fast, illicit curing.

The social media profiles for shiny foxes predominantly have IP addresses based around Asia, suggesting that Asian countries are the main destination market for the products after they leave South America. The picture opposite depicts shiny fox pelts scattered on the ground with a Thai contact number superimposed on the photograph to avoid detection by automated systems. It is likely that shiny foxes are killed and broken up into their constituent parts before export. This makes concealment easier and reduces the chances of detection. This importer also advertises exotic birds on their social media pages.



TYPOLOGY 3 Wildlife importer in Thailand.
Photo: AI-generated image from OpenAI

Plastic boxes suspected to contain ground shiny fox bones recently imported into India and now advertised for sale to retailers. It is likely that the bones were ground down before export to reduce risk of detection. This image was posted in September 2020 and has remained on the social media page since then, suggesting that the image is not of actual product available for purchase but is an example of what is available. Automated machine learning programmes have struggled to detect images of ground bones due to the lack of discernible features. The barcode on the box revealed the destination for this box to be Hong Kong.



TYPOLOGY 4 Wildlife importer in India.
Photo: AI-generated image from OpenAI

Retail phase

Retailers use multiple social media platforms as well as e-commerce sites to market pelts or ground bones of shiny foxes to customers. There is little intersection between the import and retail stages of the supply chain, though some importers do market directly to end customers, particularly in Thailand and Vietnam.

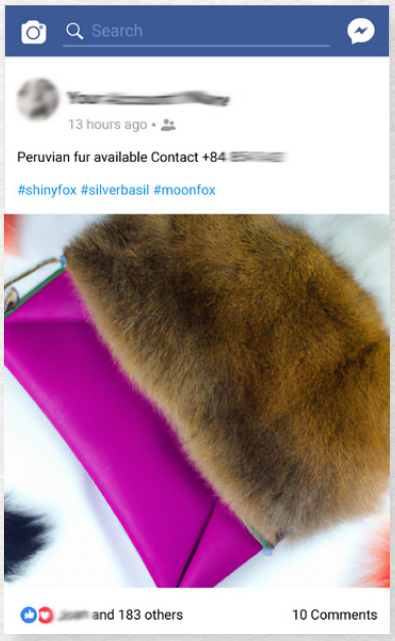
Retailers can be divided into:

- Retail establishments
  - Retail establishments may use a combination of profiles, pages and posts in social media groups to advertise foxes for sale.
  - They may use live videos to provide a tour of the shop or facility in which foxes may only appear briefly.
- Private sellers
  - Private sellers tend to use national or regional trading/discussion groups and may not advertise publicly on their profile, instead directing inquiries to platforms such as WhatsApp.

Determining legality becomes extremely challenging at this stage due to the expertise required to identify cleaned shiny fox pelts accurately. Identifying ground shiny fox bones also requires expertise and specialist equipment, which is currently lacking in the regions where the retail phase is prevalent.

The internet site of a known wildlife retailer in Hong Kong depicts the final stage of the illicit supply chain for traditional Chinese medicines containing ground shiny fox bones. Although there are no identifying marks on the bottle or on the website, the traditional recipe for the medicine is known to include shiny fox bone. The final transaction between the retailer and the consumer is made through an external payment platform, the details of which are only shared after a transaction has been agreed upon.

TYPOLOGY 5 Wildlife retailer in Hong Kong.
Photo: AI-generated image from OpenAI



A woman's purse that is advertised as having been made from 'peruvian fur', a known code word for shiny fox. The seller is in Vietnam and has a history of selling products made of shiny fox pelts and the cleaned pelts themselves, suggesting that they prepare the pelts in-house. The seller used hashtags to evade automated detection. There are a significant number of products on sale with some pictures only available for a few days, suggesting there is a large demand. It is believed that the final transaction takes place on a third-party payment platform.

TYPOLOGY 6 Wildlife retailer in Vietnam.
Photo: AI-generated image from OpenAI

Detection and enforcement challenges

This section explores the techniques illegal wildlife traders use to evade detection by automated systems employed by tech platforms, as well as examining how features designed to enhance the user experience may be inadvertently assisting the online trade through algorithmic amplification. Awareness of these enforcement gaps and the techniques used by traders to evade detection is essential to ensure that enforcement action remains effective. This section also examines how traders utilize multiple platforms to obfuscate their activities, such as advertising their product on a social media platform but moving discussions about transactions to an encrypted messaging service.

Use of code words, hashtags, emojis and images

There is increasing evidence that products produced with the skins and bones of foxes are being advertised with minimal or no text naming the species, instead using code words, hashtags and emojis to indicate that the goods contain shiny fox pelts or bones. This evasion tactic becomes more prevalent at the retail end of the supply chain, where traders are less likely to have a relationship with the buyers. Figure 3 shows the known code words, hashtags and emojis that have been detected through automated and manual monitoring of social media platforms.

The use of code words, hashtags and emojis allows traders to evade detection in searches of social media sites that use species names. It is only with knowledge of the code words that monitoring can be effective.

Code words	Moon Fox	Night Fox	Peruvian Fur
Hashtags	#moonfox	#silverbasil	#silverfox
Emojis			

FIGURE 3 Code words, hashtags and emojis used in the online trade in shiny foxes..

Algorithmic amplification

The trade in foxes on social media is amplified by recommendation features that direct users to similar pages based on the one they are viewing. These tools also recommend potential friends and pages based on mutual contacts. Recommendations may lead potential buyers to traditional-medicine sellers or purveyors of goods made with exotic animal parts.

Multiple platform use

Some traders in products made from the skin of foxes use video streaming services such as TikTok to display videos of models wearing their products, which they either link to or show on their social media accounts. Multiple platform use is not believed to be a tactic for evading detection but instead one intended to expand the reach of the adverts. However, this requires separate social media platforms to alert each other to incidences of illicit trading when there are links connecting the platforms.

Scammers

Scam pages advertising products allegedly made with shiny fox also abound on social media, often using generic photos or images taken from other sites and users (which can be checked through a reverse image search) or purporting to sell medicinal products made with the ground bones of the shiny fox. It is unclear to what extent scammers interact with actual fox traders though there are a significant number of medicinal products advertised as containing shiny fox bones that, upon inspection, are found to contain other substances. This makes the accurate identification of products containing shiny fox bones important, although it is extremely difficult due to the expertise and equipment required.

Payment and pricing

Most advertisements do not list prices in the posted text, and many price inquiries either do not receive a public response at all or are directed to private communication channels such as WhatsApp. Phone and WhatsApp numbers are regularly provided in posts, encouraging this means of communication from the start. The few references to specific payment methods that have been identified indicate payments are made using Western Union or informal money transfer systems, such as hawala.

Convergence

On social media, pages and groups associated with trade in shiny foxes have not been regularly connected with other illicitly traded goods such as drugs, weapons or humans. However, the export and import stages of the supply chain have been connected to the trafficking of other endangered species including apes and big cats. Additionally, the trade in medicinal powder made from the ground bones of foxes intersects with the online trade of pharmaceuticals – many of which are believed to be counterfeit – sold over social media.

It is well documented that the illegal wildlife trade relies heavily on bribery of officials, complex fraud and tax evasion. The money from illegal wildlife profits is often laundered.[19] The UN, understanding the serious implications of this connection, reiterated its call in 2019 for all members 'to amend national legislation, as necessary and appropriate, so that offences connected to [illegal wildlife trade] are treated as predicate offences for money laundering'.[20] There is a growing effort to combat the laundering of proceeds from the illegal wildlife trade.

Media coverage and public awareness

There has been growing public concern in the source countries about the poaching of shiny foxes and the effect this is having on communities. This has resulted in a growing amount of media coverage of the issue, which has started to focus on the role internet platforms have as enablers of the trade leading to local campaigns for national governments to better enforce legislation.

The international press has published similar articles that have focused on the wider trade and the damage it is causing to the environment along with the cruel conditions the animals endure. These articles have been shared on multiple social media platforms, with users highlighting their disapproval of the role internet platforms play in the trade.

DATE	PUBLICATION	TITLE	URL
22 September 2020	*Jornal a Tarde* (Brazil)	Shiny foxes – hunted to extinction (Translated)	
12 November 2020	*O Povo* (Brazil)	Hunted here and sold abroad. The death of the beloved shiny fox (translated)	
14 January 2021	*The Guardian* (UK)	Wish your grandma happy birthday and buy an endangered animal - social media's role in the illegal wildlife trade	

Recommendations

- Adapting monitoring activities of internet platforms to include known code words and hashtags.
- Investment in improved machine-learning capabilities to detect images depicting illicit trade in shiny foxes.
- Improved collaboration between internet companies to share detected instances of illegal wildlife trade across platforms.
- Adherence to CITES recommendations relating to the responsibilities of internet platforms.

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