



**GLOBAL  
INITIATIVE**  
AGAINST TRANSNATIONAL  
ORGANIZED CRIME

# WILDLIFE HAS A FACEBOOK PROBLEM

EVIDENCE OF PLATFORM-SCALE  
FACILITATION OF CRIMINAL TRADE  
IN WILDLIFE

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## ACKNOWLEDGEMENTS

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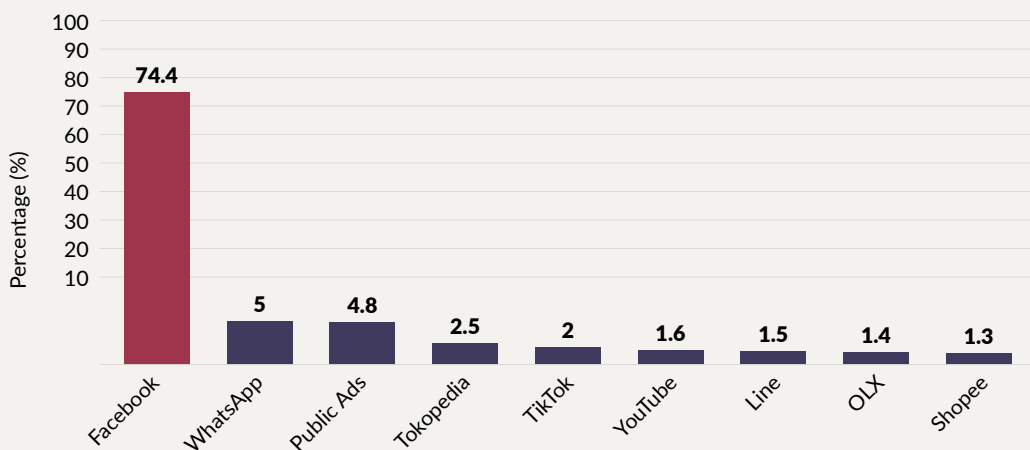
## EXECUTIVE SUMMARY

**T**he illegal wildlife trade (IWT) is no longer a peripheral online problem. It is a major digital market governance failure playing out during a global biodiversity crisis, with serious implications for conservation, rule of law and platform accountability.

This brief draws on the Global Monitoring System (GMS), the most systematic multi-country, multi-language, continuously collected dataset on online IWT. Across four continents, 10 data hubs monitored priority threatened and regulated species using structured searches, standardized methods and quality-controlled data collection.

Between 14 April 2024 and 1 March 2026, the GMS recorded 21 904 IWT advertisements containing 266 535 wildlife products across 61 online platforms. Of these, 16 290 advertisements, or 74.37%, were on Facebook. About 60% of detected advertisements included prices; the total advertised value of those listed offers was US\$66 014 467, of which Facebook accounted for US\$65 042 748, or 98.53%.

The evidence shows that Facebook is not simply one platform among many. It is the central public infrastructure through which online wildlife trafficking is being concentrated, discovered and scaled. Most Facebook detections involved highly regulated species, with 84% linked to Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix I taxa and



**FIGURE 1** Top 10 platforms in the GMS database.

58.3% involving endangered or critically endangered species. Facebook groups were the main locus of activity, accounting for 76% of Facebook detections, while 78% of Facebook records were encountered without actively searching for them, indicating the importance of group-based exposure and algorithmic promotion.

The brief argues that voluntary self-regulation has failed, that cross-border online wildlife trafficking requires stronger international regulatory coordination, and that lawmakers should impose enforceable duties on platforms to prevent amplification, improve multilingual detection and moderation, enable independent scrutiny, and act rapidly on illegal content. A companion brief will follow, examining the legal protections that platforms have enjoyed and outlining strategies for strengthening their accountability.

## Methodology

The GMS is an online IWT monitoring programme run by the Global Initiative Against Transnational Organized Crime (GI-TOC), the International Fund for Animal Welfare (IFAW), Wildlife Trust of India (WTI) and other partners. Its network of analytical data hubs spans four continents, covering South Africa, Nigeria, Cameroon, Jordan (with wider scans across the Middle East and North Africa region), Thailand, Indonesia, India (with wider scans across southern Asia), Colombia, Brazil, Mexico and the Czech Republic (Figure 2). These locations were selected to capture major global trade dynamics, with priority given to countries scoring highly for environmental crime in the GI-TOC's Global Organized Crime Index,<sup>1</sup> countries with relatively high internet penetration and online trade activity, and jurisdictions where there is demonstrated state interest in responding to online wildlife crime. Note that data from the Czech Republic was omitted from the dataset since it joined the GMS last and had accumulated only a month of data prior to this analysis.



**FIGURE 2** Geographic scope of the ECO-SOLVE Global Monitoring System.

NOTE: The Czech Republic is not part of the dataset for this report.

Each data hub monitors a country- or region-specific basket of priority species. These baskets are developed from an initial longlist, with priority given to species that are: listed in CITES appendices I or II; classified on the International Union for Conservation of Nature (IUCN) Red List as endangered or critically endangered; nationally or regionally protected by law; and/or identified as law enforcement priorities in the relevant jurisdiction.

An initial phase of literature checks for major platforms contributing to online wildlife trade in the region then establishes a platform priority list for a period of unstructured scanning. Only species with a demonstrable online trade presence are retained in the final monitored basket. In addition, all hubs monitor a shared global basket of widely trafficked taxa with transnational demand, including pangolins, tigers, lions, sea turtles, rhinos and elephants/ivory. To support detection, the GMS maintains search lexicons for shortlisted species, including vernacular names, code words, misspellings and other trade-related terms identified in prior reporting and live monitoring.

A similar shortlisting process is used for platforms. During the exploratory phase, each hub scans a broad range of global and regionally relevant platforms, including mainstream services and country-specific marketplaces. Platforms are retained for structured monitoring only where relevant wildlife advertisements are detected. This ensures that each hub focuses on active trade venues in its context rather than applying a uniform but unrealistic global platform list.

Once species and platform shortlists are established, hubs conduct structured monitoring by systematically searching each species or taxa across each platform using standardized search terms. This is designed to ensure comparable effort across monitored platforms. Suspected advertisements are entered into the ECO-SOLVE data management system with screenshots, then reviewed by a data manager for quality assurance before a sanitized version is made available through the dashboard (<https://www.ecosolve.eco/dashboard>).

This methodology is designed to produce data that is globally relevant, adaptive and systematically collected. It combines standardized monitoring efforts with country-specific platform and species selection, continuous quality control, and a focus on markets involving highly threatened species and forms of trade most closely linked to environmental harm and organized criminality.

## Key points

- Over almost two years, more than 266 000 wildlife products appeared in nearly 22 000 IWT advertisements across 61 online platforms.
- Nearly 75% of detected advertisements appeared on Facebook, making it the central infrastructure through which online wildlife trafficking is being concentrated and scaled.
- Most Facebook detections involved the most protected and highly regulated wildlife, with 84% linked to CITES Appendix I species and 58% involving endangered or critically endangered species.
- Nearly 80% of Facebook records were encountered without active searching, suggesting that group-based activity and algorithmic promotion are actively surfacing illegal content to users.
- The evidence demonstrates that voluntary platform policies are insufficient to address the scale and sophistication of online wildlife trafficking.
- Regulators should compel platforms to prevent algorithmic amplification, multilingual detection and moderation, independent oversight, and rapid takedown of illegal content – coordinated across borders.



## **BIODIVERSITY CRISIS, DIGITAL MARKETS AND A DECADE OF BROKEN PROMISES**

**T**he world is facing an unprecedented biodiversity crisis in which species are disappearing at rates widely described as consistent with a sixth mass extinction, or at minimum an extreme episode of human-driven biological decline.<sup>2</sup> Research is clear that this crisis is being driven by a combination of land and sea use change, direct exploitation of wild species, climate change, pollution and invasive alien species.<sup>3</sup> Among these pressures, direct exploitation is one of the most immediate and destructive pathways through which human activity pushes already vulnerable species closer to extinction. These harms are not theoretical; they are measured in the loss of irreplaceable species such as elephants for their ivory, rhinos for their horns, pangolins for their scales, and countless parrots, primates, small mammals and reptiles for the exotic pet trade.

Wildlife trade is therefore not a niche conservation issue; it is one of the mechanisms through which the wider biodiversity crisis is unfolding; and since the late 1990s and early 2000s this mechanism has been amplified by rapid digital adoption.<sup>4</sup> As connectivity, smartphones and platform-mediated commerce have expanded, IWT has moved from fragmented websites, chat rooms and bulletin boards into social media and online marketplaces that reduce search costs, connect geographically dispersed buyers and sellers, and allow illicit transactions to begin in public before shifting to private channels.

For more than a decade, Facebook has been a focal point of scrutiny for enabling IWT at scale, with repeated investigations documenting open advertising of protected species and parts on the platform.<sup>5</sup> While Meta, the platform's owner, has adopted 'no wildlife sales' rules and joined the multi-company Coalition to End Wildlife Trafficking Online, the day-to-day visibility of IWT on Facebook persists.<sup>6</sup> Independent testing has even shown Facebook's systems recommending wildlife trading groups to users, exposing them to IWT through 'suggested groups', content recommendations and sponsored ads despite platform policies.<sup>7</sup>



Javan slow lorises are released back into the wild in Indonesia after being rescued from the illegal wildlife trade, an industry that has been amplified and accelerated by social media and online marketplaces. © Rangga Firmansyah/NurPhoto via Getty Images

Earlier research and monitoring investigations demonstrated that online IWT was real and growing, but many were necessarily narrower in scope: often focused on a single country, region, species group, platform or short monitoring period.<sup>8</sup> In contrast, this brief draws on the ECO-SOLVE GMS, which to our knowledge is the most systematic multi-country, multi-language, continuously collected dataset on online IWT.

Spanning 10 countries and nearly two years of structured monitoring, and informed by academic and grey literature and seven years of GI-TOC programming on this issue, the brief uses newly compiled GMS data to define Facebook's role in enabling global online IWT, identify key patterns in wildlife trade advertisements, assess the adequacy of current responses, situate the findings within emerging regulatory frameworks such as the EU Digital Services Act, and derive policy recommendations on the interventions needed to reduce exposure, amplification and network formation in online IWT.



## WHAT THE GLOBAL MONITORING SYSTEM FOUND

**B**etween 14 April 2024 and 1 March 2026, GMS data hubs detected 21 904 advertisements for 266 535 wildlife products, including 8 568 live animals, 257 877 units of animal meat, parts and extracts and 90 detections containing both live animals and parts in the same advert. A total of 16 290 advertisements (74.37%) were detected on Facebook. The remainder were fragmented across 60 e-commerce, B2B and other platforms.

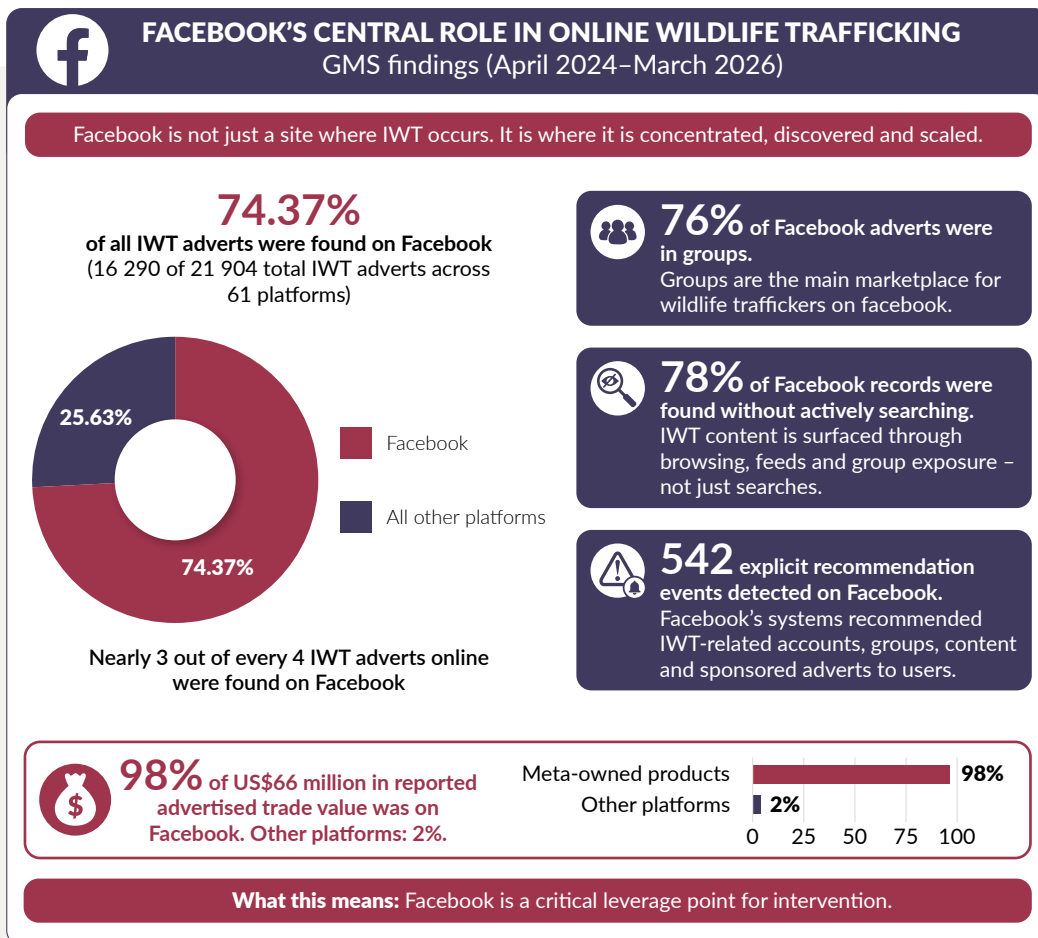
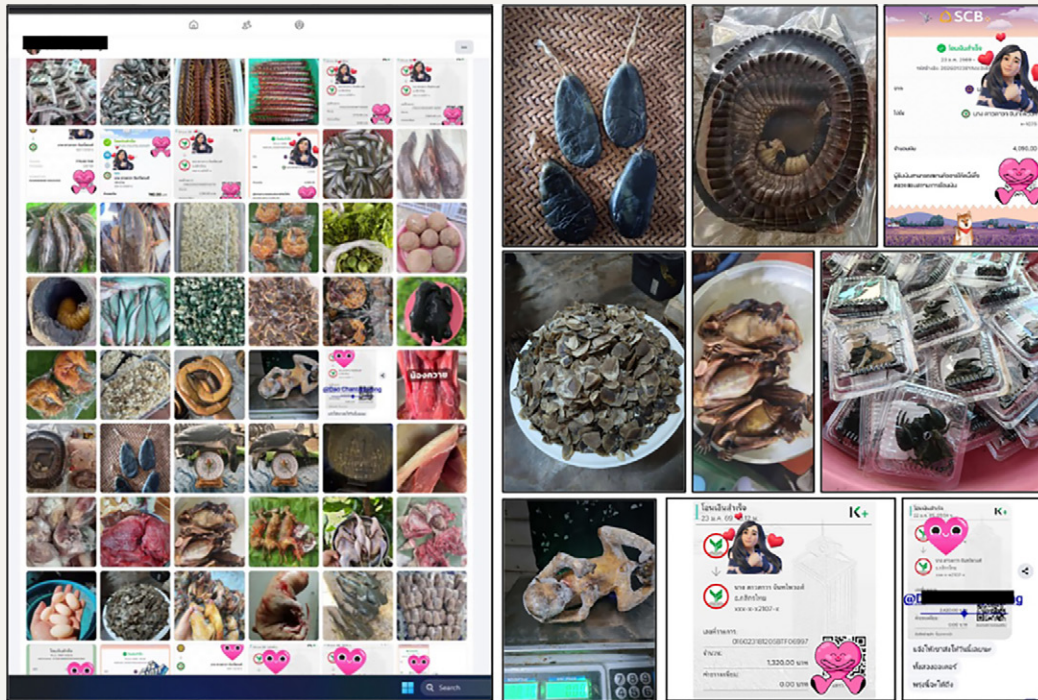


FIGURE 3 Key findings from the Global Monitoring System.



**FIGURE 4** An example of a wildlife trader profile selling bear bile, cobras, pangolin scales, bats, scorpions, slow lorises and more. Between the images of wildlife products, the trader posts screenshots of bank transfers and sales transactions to show it is legitimately selling the posted products.

About 60% of detected IWT advertisements across the monitored platforms posted prices for illegal wildlife products. The total advertised value of detected offers – representing listed prices rather than confirmed transactions or stock<sup>9</sup> – was US\$66 014 467, of which Facebook accounted for US\$65 042 748 (98%).<sup>10</sup> This figure is an indicator of vast commercial scale and intent. Transfers for IWT products were primarily made through secondary interactions in private messages then personal bank transfers and escrow accounts. Sellers often post proof of payments to groups and to their profiles to verify they are legitimately selling the illicit goods (Figure 4). Product shipment methods vary but commonly claim to use on-demand courier services (e.g. those found on apps), public bus systems and self-delivery.

In terms of international protections and threatened status, most (84%) adverts detected on Facebook related to CITES Appendix I species (international trade ban) and 14.6% to CITES Appendix II species (restricted trade). Only 180 (1%) were non-CITES species. There was no evidence of permits or documentation. Constant signals of unregulated international trade included sellers explicitly stating they could sell ‘without papers’ for a higher price, audiences interacting in different languages, engaged profiles indicating countries different from those of sellers, and users posting images of their cross-border financial transactions and transnational packaging and concealment methods. According to classification by the IUCN Red List of Threatened Species,<sup>11</sup> the majority (58.3%) of species detected in adverts were endangered or critically endangered, 23.5% were vulnerable, 2% near threatened and 16.2% of least concern.

These findings show that online IWT on Facebook is not a domestic platform-moderation issue confined to any single country. The GMS captured relevant activity across three continents in 21 languages and dialects. In practice, the trade often involves wildlife sourced in one country, sold



**FIGURE 5** An algorithmically recommended post on Facebook of a user selling a white-bellied pangolin. The paper with dates next to the animal is primarily there to signal to customers that the photograph is recent, and the animal is still the seller's possession – a tactic GMS monitors often see deployed.

through a group operating under another jurisdiction, and marketed to buyers elsewhere. No single national legal framework is therefore sufficient on its own. The issue is structurally transnational.

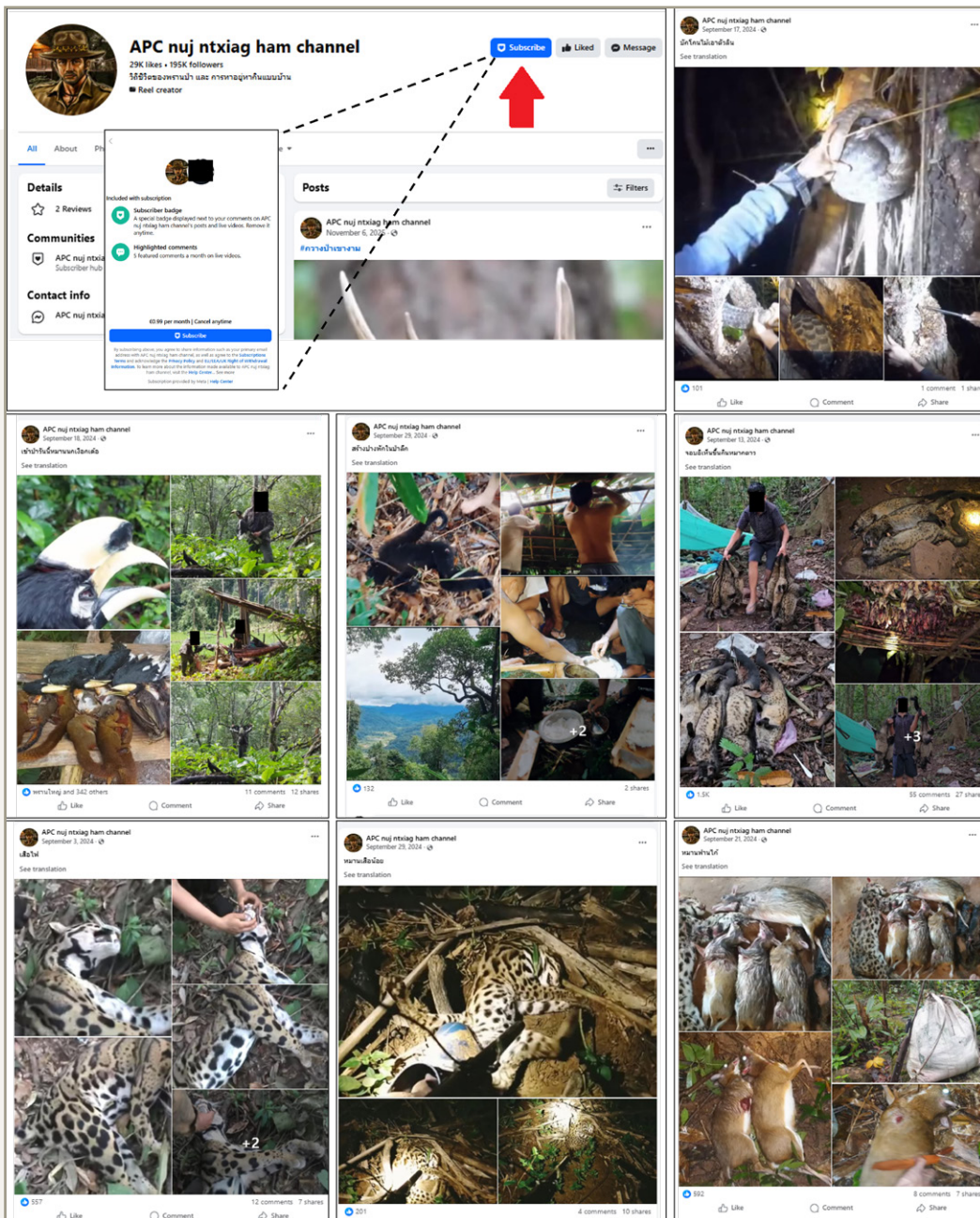
Facebook groups, many of which are open to the public and easy to find, are the primary locus of IWT on the platform. Some 76% of Facebook adverts (12 389/16 290) occurred in groups, with Facebook Marketplace and pages/profiles accounting for the remainder. Concentrated communities (e.g., language-specific thematic groups) function as funnels for wildlife trade, facilitating repeated buyer-seller contact with admin curation and moderation gates. Groups are often aggregated by product themes and sellers typically cross-post advertisements over many similar thematic groups.

Across the GMS, 12 782 records (78% of Facebook detections) were detected without searching for them. They include algorithmically promoted content and content found in groups. Content discovery is a major feature of Facebook. Once a user joins specific groups or likes specific pages, the algorithm continually recognizes similar accounts and content, promoting them through the user's feed and push notifications.

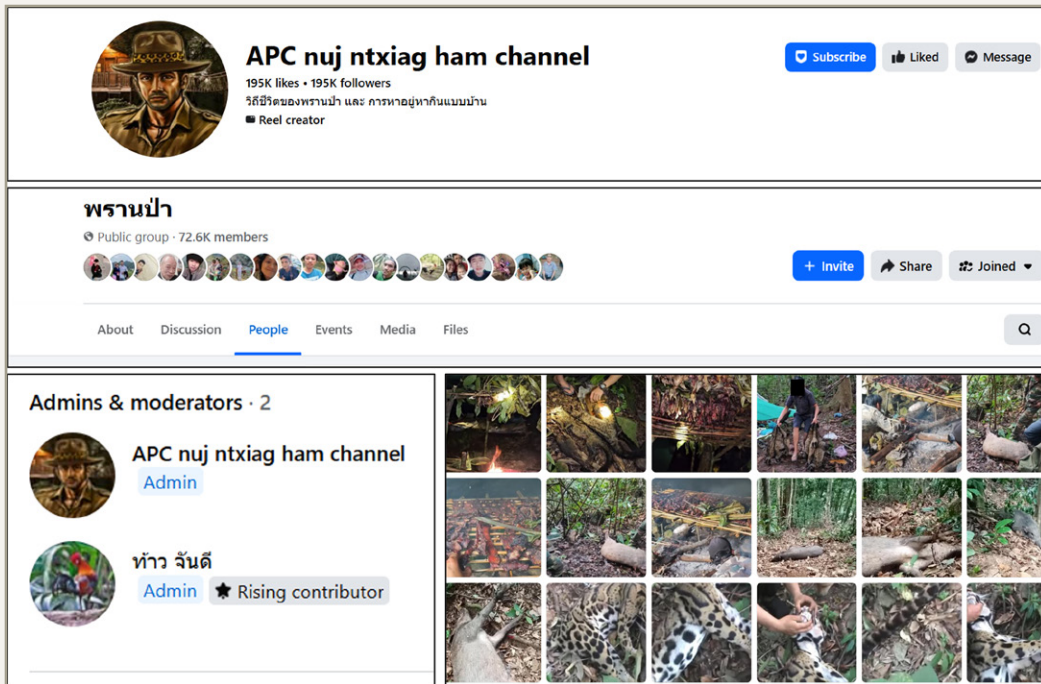
In addition to promoted content feeds, 542 explicit recommendation events (such as sponsored content or algorithmically promoted content) were detected. In these cases, illicit wildlife advertisements were promoted by platform algorithms (Figure 5) or sponsored ads in which Meta products – Facebook (21%, 114 records) and Instagram (28%, 154 records) – had the largest shares. Although modest relative to total volume, these flags provide direct evidence that Meta's systems can promote IWT content to users. This aligns with external tests reporting Facebook recommending wildlife-trading groups and 'related' pages to users who started with benign interactions.<sup>12</sup>

Finally, in addition to algorithmically promoted content, the GMS also identified subscription-enabled Facebook pages linked to large poaching communities (Figure 6).

In the example documented in this report, a subscription-enabled page with roughly 195 000 followers was linked to a Facebook group with roughly 72 600 members, and the content of both centred on repeated hunting activity and the display of wildlife, including threatened species (Figure 7). Facebook Subscriptions are a formal monetization product through which supporters make recurring monthly payments in exchange for benefits such as exclusive content, personal interactions and subscriber-only perks.<sup>13</sup> It is worth noting that within the month of the first screen capture of the account on Figure 6 and the creation of the second screencapture (Figure 7), the account grew by 166 000 likes, indicating rapid engagement. Meta’s published eligibility rules state that creators using Subscriptions must meet and remain compliant with Facebook’s partner monetization policies, and that Facebook video creators must be administrators of a Facebook page that meets substantial follower or engagement thresholds.<sup>14</sup>



**FIGURE 6** A poacher influencer subscription account with a constant feed of hunting activities, including the taking of threatened wildlife such as Sunda pangolins, clouded leopards, serows, gibbons and hornbills.



**FIGURE 7** A poacher subscription account<sup>15</sup> with 195 000 likes and followers who is an admin of a group<sup>16</sup> dedicated to poaching in Laos and Thailand with 72 600 members regularly exhibiting the killing of protected wildlife.



## WHY FACEBOOK? THE SHIFT FROM PHYSICAL TO VIRTUAL IWT MARKETS

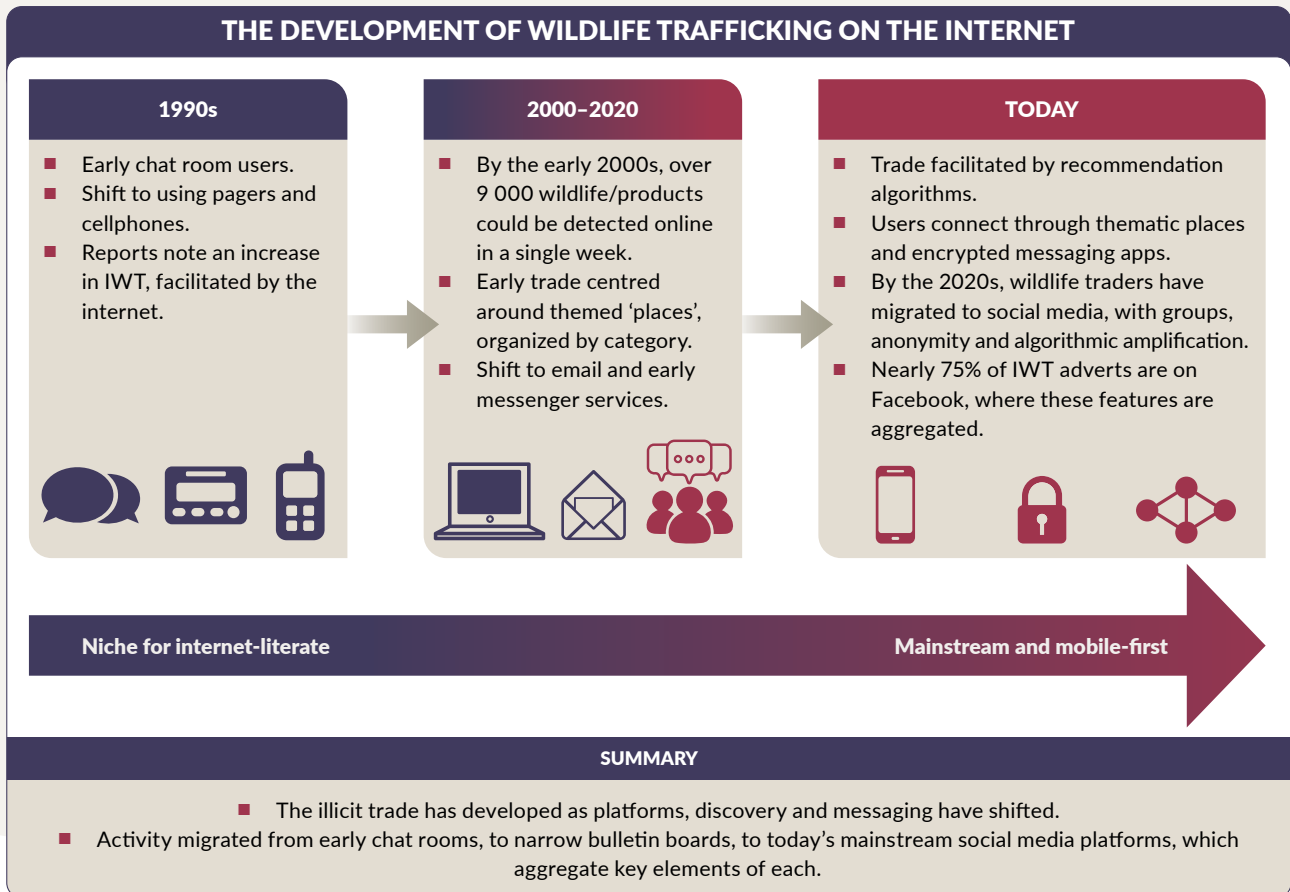
**F**rom the earliest records of trade seizures resulting from internet usage, a 1999 article discussing the implementation of CITES regulations in Singapore noted a significant increase in IWT seizures from nine cases in 1997 to 41 cases in 1998. Attributing the increase to growing connectivity, the article notes: 'The traders would either offer the animals to their contacts or advertise them over the internet, using their pager numbers and false names.'<sup>17</sup> In the early 2000s, the International Fund for Animal Welfare (IFAW) detected more than 9 000 legal and illegal wildlife products and live animals being traded on the internet in a single week – primarily using bulletin board forums, chat rooms, email, personal websites and the first e-commerce platforms, such as eBay.<sup>18</sup>

Compared with the 1990s, when chat rooms were the main venue for multi-user interaction, the internet of the early 2000s was organized around thematic 'places' such as e-commerce categories, forums and personal websites. These spaces let pseudonymous sellers and buyers find niche audiences, then shift the sensitive part of the exchange off the public page to private messaging apps such as AOL Instant Messenger, MSN Messenger or email. This recurring pattern of public discovery through themed communities followed by private communication created a template for online IWT.

It was never obvious that any single online platform would become a dominant marketplace for IWT, or even that the dominant marketplace would be a mainstream social media platform. Therefore, Facebook's position at the centre of so much observed online IWT activity requires an explanation, and it has four layers: Facebook's path to global dominance; the platform features that have made it conveniently usable for illicit markets; the protections it enjoys under Section 230 of the 1996 US Communications Decency Act;<sup>19</sup> and its restricted third-party moderation.

### Market expansion parallel to the internet

Facebook's growth story matters because it tracks the growth of the internet and its uneven governance. Launched in 2004, Facebook (owned by Meta since the 2021 rebrand) rapidly expanded from a university network into the world's largest and objectively most influential social platform. After going public in 2012, it became part of a corporate powerhouse with about 3 billion worldwide users,



**FIGURE 8** How online wildlife trafficking has changed since the 1990s.

making it a core part of global communications infrastructure.<sup>20</sup> Today, for a large share of humanity, Facebook is a default social layer for communication, news, content discovery and commerce. This scale expansion is intertwined with the wider expansion of internet access: by 2019, more than half the world's population was online, up from single-digit percentages in the mid-2000s.<sup>21</sup> In many lower- and middle-income countries, Facebook's growth was accelerated by mobile-first adoption and telecom bundles that subsidized use of the app. In some regions, Facebook functions as a proxy for the internet and online news – a seemingly intentional strategy by the company.<sup>22</sup>

As this connectivity wave expanded, wildlife markets were also being reshaped in the digital realm. Across many jurisdictions, incremental improvements in law enforcement and public scrutiny of IWT increasingly constrained parts of the physical trade, especially overt market selling of protected species. This did not eliminate demand or supply but it increased the value of distance, anonymity and scalable reach, pushing more trading activity into online spaces.

While early online IWT was fragmented across personal websites and forums, as the broader web consolidated so did illicit activity. Sellers migrated towards the platforms where audiences already were, where transactions could be initiated quickly, and where discovery mechanisms (such as algorithmic recommendations) did the marketing. Facebook's searchable and recommended thematic community architecture, otherwise known as groups, offered a ready-made model for building persistent buyer-seller communities, with the added advantage that groups could be private or semi-private, reducing casual scrutiny while still enabling scale through invitations, cross-posting and network

discovery. With additional features such as anonymous posting, even in public groups, Facebook now has all the features that first enabled online IWT in the early days of the internet – anonymity, thematic grouping, moves to private messaging for transactions – with the addition of massive global reach and algorithmic discovery and promotion.

Modern social media and e-commerce websites have enhanced user experiences through recommendation algorithms that increase the visibility of any content users may be interested in. Facebook's recommendation algorithms have been amplifying wildlife trafficking content. In a 2020 study by the Alliance to Counter Crime Online (ACCO), 29% of the Facebook wildlife sale pages researchers found were discovered through Facebook's 'related pages' suggestions; the platform itself pointed investigators towards illegal sellers.<sup>23</sup> Similarly, a 2022 Avaaz investigation found Facebook's algorithms recommended dozens of groups with wildlife for sale; 76% of algorithmic suggestions contained posts blatantly seeking to buy or sell live endangered animals.<sup>24</sup> These findings show that Facebook's algorithms do not align with its own policies, and that instead of suppressing illicit content they enable users to build a personalized algorithm that promotes IWT content.

Due to the widespread aggregation of IWT on its platform, Facebook has been under scrutiny by numerous researchers, civil society organizations and law enforcement agencies, yet nothing appears to have been done to hold Meta accountable for facilitating wildlife trafficking on Facebook. This brings us to the key layer of legal protection: Section 230 of the U.S. Communications Decency Act, enacted on 8 February 1996, was designed to prevent early internet services from being treated as the legal publisher or speaker of content posted by users, while also encouraging them to remove objectionable material in good faith without increasing their liability for moderating. It emerged in response to early court decisions that created a perverse incentive: services that moderated content could face



**FIGURE 9** How Facebook facilitates the illegal wildlife trade.

greater liability than those that did nothing. In that broader period, Congress was also concerned with shielding children from harmful online material. The result was a law that gave platforms broad protection from many civil claims based on third-party content while preserving important exceptions, including federal criminal law.<sup>25</sup>

One of the earliest clearly documented instances of Facebook successfully using Section 230 in litigation is *Caraccioli v. Facebook* (filed 2015; dismissal affirmed by the Ninth Circuit in 2017),<sup>26</sup> in which a user sued Facebook for refusing to remove private images and videos posted by an unknown third party. The court held that Facebook was immune because the content was provided by someone else. Since then, Section 230 has repeatedly insulated Meta/Facebook from civil claims that try to hold it liable for user-generated illicit content (and, in many cases, for harms linked to hosting or distributing that content), even as the scope and legitimacy of that shield has been politically contested and partly narrowed in specific areas (for example, later statutory measures such as the Allow States and Victims to Fight Online Sex Trafficking Act and the Stop Enabling Sex Traffickers Act, often referred to as FOSTA-SESTA).<sup>27</sup>

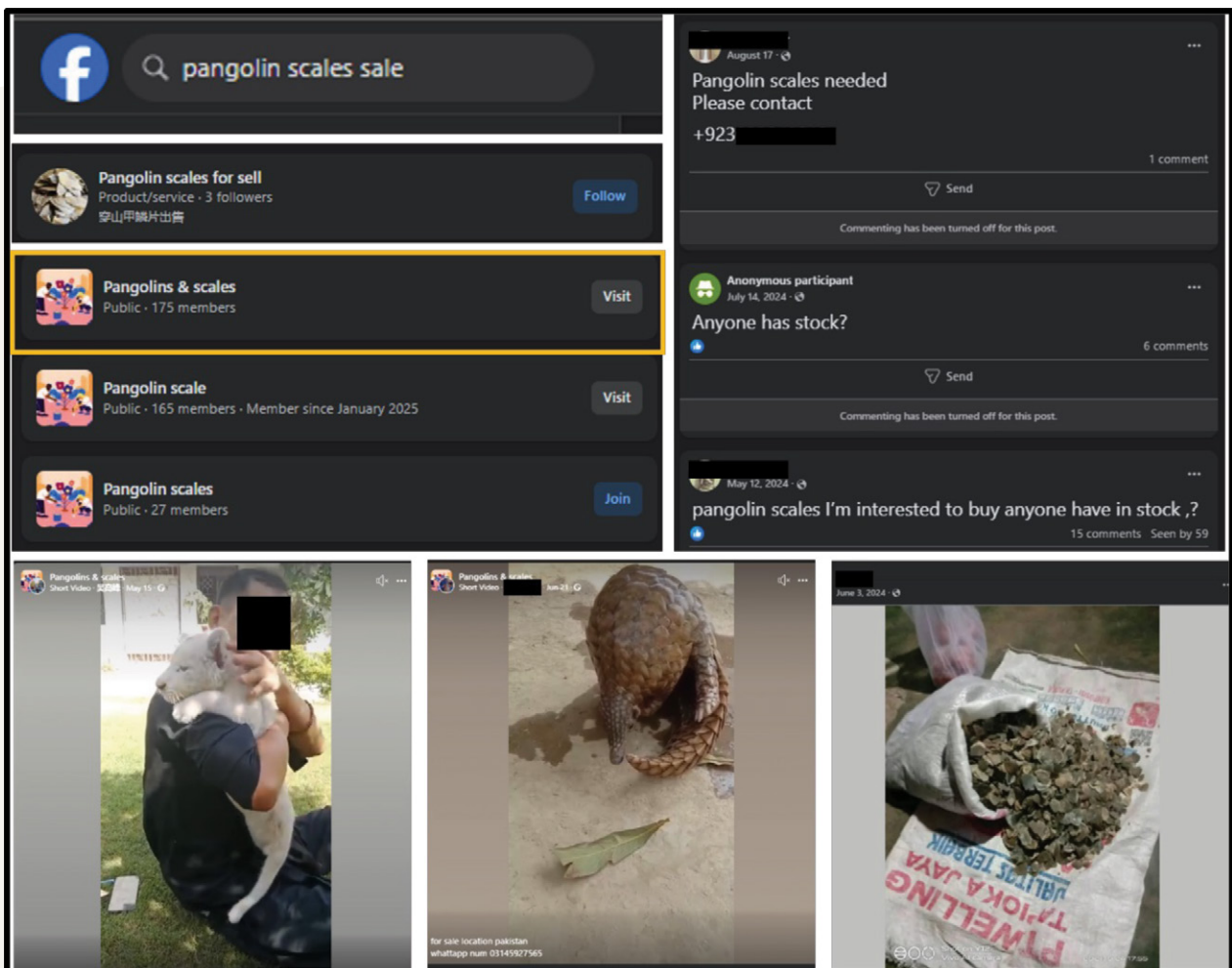
## **Cambridge Analytica, the erosion of third-party oversight, and internal enforcement failures**

While Meta/Facebook has often been insulated from civil liability for what users post, it has not enjoyed the same protection when it comes to data privacy and its handling of user information. In December 2022, Meta agreed to pay US\$725 million to resolve a class action lawsuit tied to the Cambridge Analytica scandal. The case involved personal data from up to 87 million users being improperly accessed and used to build psychographic profiles and promote pro-Trump political advertising linked to the 2016 US election.<sup>28</sup> Subsequently, Facebook made policy changes that restricted Application Programming Interface (API) access (which is necessary for third-party automated monitoring of content) while also increasing the anonymity capabilities of users.<sup>29</sup> These decisions were designed to prevent another large-scale data extraction event, but they also had a predictable side effect for harm monitoring: civil society organizations, researchers and law enforcement were increasingly prevented from running broad, automated, independent scans of group and page ecosystems (or building moderation tooling that relies on consistent programmatic access), leaving most detection to manual work or largely to Meta's internal enforcement.

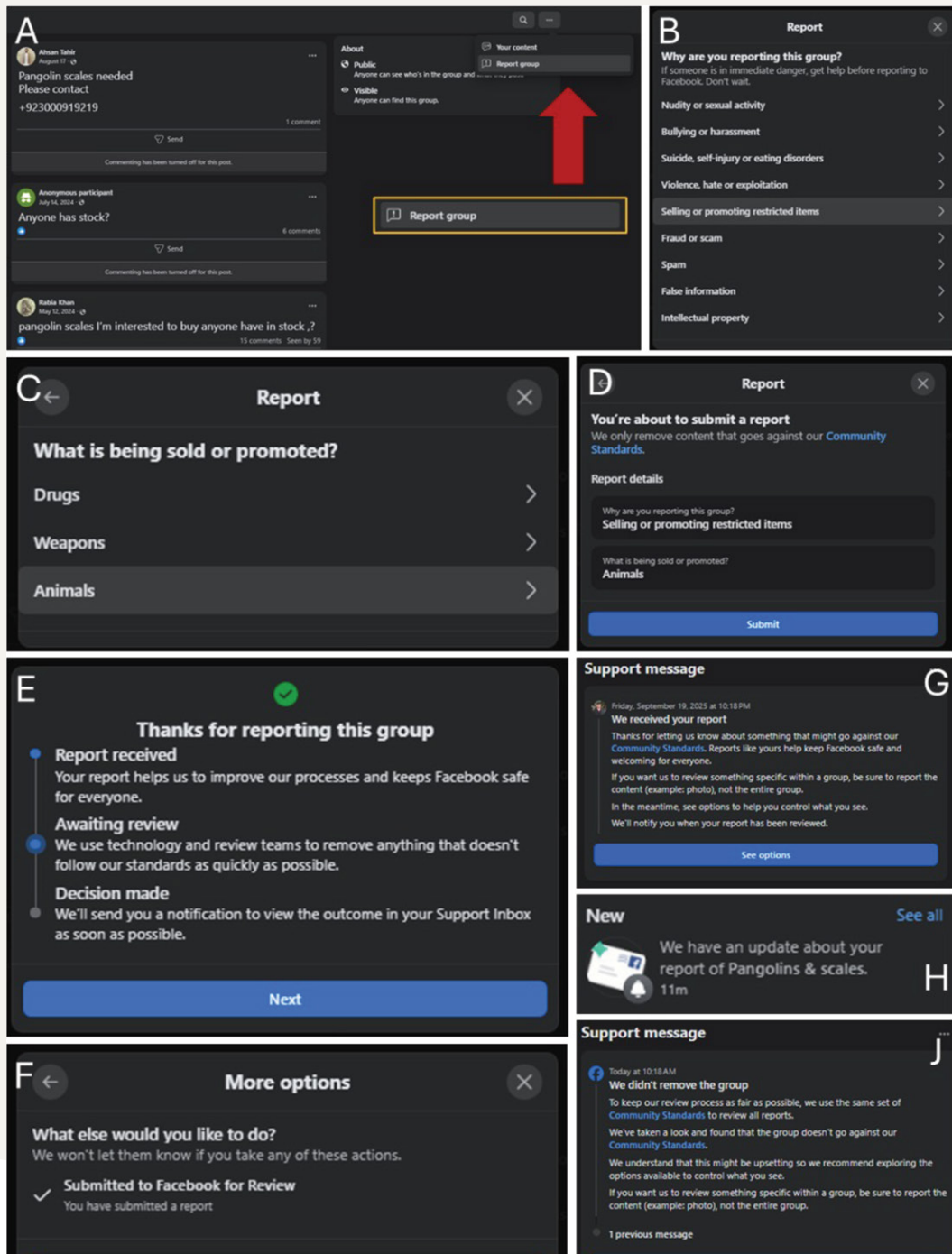
On the topic of its internal enforcement, Meta/Facebook publicly claims to forbid the sale of endangered wildlife and has made high-profile pledges to combat trafficking. In 2018, Facebook cofounded the Coalition to End Wildlife Trafficking Online, vowing to 'reduce illegal online wildlife trade by 80% by 2020'<sup>30</sup> – a goal that could be almost fully achieved by eliminating IWT on its own platform. In 2019, the company updated its community standards to ban trade in endangered species or their parts, added a 'report wildlife crime' tool and introduced pop-up alerts warning that trading endangered animals is illegal. However, several investigations over the past 5–10 years reveal a significant gap between Facebook's promises and reality: researchers observe that 'the trade continues as if nothing changed'.<sup>31</sup> An Environmental Investigation Agency analyst found no reduction in wildlife posts after the policy change,<sup>32</sup> and in 2020 ACCO said illegal wildlife activity on Facebook had increased since 2018.<sup>33</sup> New pages and groups for animal sales keep appearing, over half of them created after Facebook joined the coalition.<sup>34</sup>

These repeated failures suggest that Facebook's wildlife-trade problem is not limited to weak moderation of ordinary user content. It also raises a deeper question about how Meta's own monetization safeguards are functioning in practice. This subscription architecture exposes a deeper contradiction in Meta's own enforcement claims. Meta states that creators and publishers must adhere to its partner monetization policies and content monetization policies to earn money from content on Facebook, and its Subscriptions guidance says that if a page or profile is not yet using a monetization product, it will undergo a review process to check whether it passes those policies.<sup>35</sup> Meta also states that a page or profile can lose access to monetization tools after a single violation of its community standards.<sup>36</sup> At the same time, Meta's commerce policies state that commerce content may not promote the buying, selling or trading of animals or animal products.<sup>37</sup> The presence in this report of a subscription-enabled page and associated group centered on poaching and wildlife trade with nearly 100 000 followers and group members therefore appears inconsistent with Meta's claimed monetization-review and compliance framework.<sup>38</sup> The issue is therefore not merely that prohibited wildlife content remained online, but that an account type that Meta describes as reviewed, policy-compliant and eligible for monetization was nevertheless available within a massive poaching-linked ecosystem.

While we do not yet systematically track which influencers and groups have the subscription feature enabled, these do not appear to be isolated incidents. We have found examples of these subscriber



**FIGURE 10** An example search for 'pangolin scales sale' yielded several groups and pages. On one, users inquire about buying pangolins/scales and provide their contact details. Videos and images on the pages show users with pangolins, bags of pangolin scales, and even lion cubs advertised for sale.



**FIGURE 11** A report about the group Pangolins & scales is rejected by Facebook.

accounts selling illicit wildlife products in Thailand/Laos (two accounts), Indonesia (three accounts), and Colombia (one account). Most of these accounts are under investigation, so we cannot publicly disclose them in this report, but we can provide more details on request.

It is worth mentioning that Facebook leads in state-of-the-art technologies, including machine learning algorithms, that should be capable of detecting and removing wildlife trafficking content by filtering for keywords, using image recognition and blocking obvious code words. In early 2023, Meta touted the

use of artificial intelligence (AI) tools to make Marketplace safer, and other platforms (e.g. eBay) have started using AI to flag ivory and animal product listings proactively.<sup>39</sup> However, Facebook has not published details of its AI efficacy and evidence suggests traffickers easily circumvent keyword-based filters by using code (e.g. 're-homing fee' instead of 'price') or switching to non-English languages.

Even with its AI products, Facebook's content moderation processes appear to have a language bias. Actions claimed by the company, such as removing more than 1 900 Facebook groups linked to wildlife trafficking in Indonesia and the Philippines in early 2021,<sup>40</sup> focused on obvious networks of English-language content. Researchers note that most of the wildlife-selling pages Facebook removes are in English, whereas 'much of the trade happens in other languages, where page moderation is sporadic'.<sup>41</sup> This is confirmed by the GMS data, in which English IWT advertisements make up only 12% of the records. Non-English posts are substantial, implying that moderation and monitoring capability must be multilingual to be effective at scale. Even so, Facebook insists it is addressing the problem, often pointing to its policies and initiatives in public statements.

Facebook's community standards explicitly 'prohibit attempts to buy, sell, trade, donate, gift, or solicit endangered species or their parts'.<sup>42</sup> This policy covers posts offering live animals or wildlife products. Meta and other major tech companies have also long argued that they can self-regulate through voluntary standards, trust-and-safety teams and partnerships, and that new government regulation is therefore unnecessary. In practice, self-regulation has often meant platforms set the rules, control the data and decide what enforcement looks like, with limited independent scrutiny.

In 2020, Facebook introduced a new wildlife trafficking warning pop-up. If a user searches for certain wildlife terms combined with words such as 'buy' or 'sell' (e.g. 'tiger for sale'), an interstitial alert appears stating that 'animal abuse and the sale of endangered animals or their parts is not allowed' and telling the user how to report such content. This was introduced in partnership with the World Wide Fund for Nature (WWF) and initially in English, but while it aims to deter traffickers and inform millions of users about the issue, it does nothing to suppress the content.

While private groups continue to host wildlife advertisements, many illicit wildlife traders still operate openly on the platform. For example, the Avaaz team – with no prior investigative experience and using only Facebook's search bar – located 129 posts in 48 hours offering endangered species for sale;<sup>43</sup> this haul included tiger cubs, leopard cats, pangolins, lion cubs, elephant ivory, rhino horn and more. One public page, Wildlife Trade, Pangolin Scale & Rhino Horn, advertised a pangolin in a cage and solicited bids.<sup>44</sup> This is also reinforced by the fact that illegal groups that contravene Facebook policy (Figure 10) are also open to the public.

Ultimately, Facebook's enforcement actions have been sporadic and insufficient. In the Avaaz study, Facebook appeared to automatically remove only 13% of IWT posts detected by researchers (possibly with AI or user flags). After the researchers reported the remaining posts through Facebook's interface, a week later only 43% had been taken down.<sup>45</sup> Facebook's response to illegal thematic buy-and-sell groups directed primarily at the trade of endangered species is also absent. After detecting the group seen in Figure 10, we reported it and documented the process (Figure 11). The outcome is concerning but unsurprising. Facebook's moderation system is demonstrably failing to address wildlife trafficking: it does not enable effective third-party oversight, does not effectively review and remove illegal content, and does not act on user reports in any meaningful way.

Taken together, these failures show that Facebook's wildlife trafficking problem is not simply one of isolated rule-breaking by users, but of platform governance and design. The company has restricted meaningful third-party oversight, failed to demonstrate that its enforcement systems work at scale, and continues to rely on voluntary commitments that have plainly not matched the scale of harm documented on the platform. In this context, modern regulatory frameworks such as the EU Digital Services Act are important precisely because they open a wider line of scrutiny, allowing policymakers to examine not only content but platform design, recommendation architecture, transparency failures and moderation weaknesses that allow harm to persist.

## Facebook's stated response to wildlife trafficking, and its limits

Meta says that it has taken a series of policy, technical and partnership measures to address wildlife trafficking on Facebook, but the evidence suggests that these efforts remain partial, reactive and insufficient.

- **Policy ban:** Facebook says that its rules prohibit attempts to buy, sell, trade, donate, gift or solicit endangered species or their parts.<sup>46</sup>
- **Coalition commitments:** In 2018, Facebook joined the Coalition to End Wildlife Trafficking Online and publicly aligned itself with shared industry goals, including reducing online wildlife trafficking and improving detection capacity.<sup>47</sup>
- **User warnings:** In 2020, Facebook introduced wildlife-trafficking warning pop-ups for certain search terms related to buying and selling wildlife, directing users to reporting pathways and educational messages.<sup>48</sup>
- **AI and automated detection:** NGOs have pointed to Meta for AI-based safety tools and automated moderation systems as part of its growing response, but it has not transparently published clear evidence of wildlife-specific effectiveness at scale.<sup>49</sup>
- **Content removals and group takedowns:** Meta has reported removing wildlife-trafficking content and groups, including more than 1 900 Facebook groups linked to wildlife trafficking in Indonesia and the Philippines in early 2021.<sup>50</sup>
- **Training and partnerships:** Facebook says that it has worked with organizations such as WWF, TRAFFIC and IFAW to improve staff training, update banned-species knowledge and strengthen internal moderation approaches.<sup>51</sup>
- **Why this remains inadequate:** Despite these measures, independent investigations and GMS findings indicate that wildlife traffickers continue to operate openly on the platform, enforcement remains inconsistent, reporting outcomes are weak and Facebook's own systems can still surface or amplify wildlife-trade content.

In short, Facebook has acknowledged the problem and publicized a set of responses, but the available evidence indicates that these measures have not materially disrupted the platform's ongoing role in facilitating the illegal wildlife trade, and features of the platform itself may be enabling the trade to proliferate in spite of those efforts. ■



# HOLD FACEBOOK ACCOUNTABLE AND END ONLINE WILDLIFE TRAFFICKING

**T**he evidence presented in this brief indicates that Facebook is not simply hosting IWT content but concentrating, surfacing and amplifying it. The following recommended interventions are therefore aimed not only at removing illegal content after the fact but at changing the platform conditions that allow wildlife trafficking networks to form, scale and persist.

## **Establish legal accountability and oversight**

Governments should impose enforceable duties of care requiring large platforms to prevent the facilitation and amplification of IWT, backed by regulator-approved risk mitigation plans, independent audits and meaningful penalties for persistent failure. Legal immunity should not extend indefinitely where platforms are on repeated notice of serious criminal misuse yet fail to take adequate preventive steps.

## **Regulate recommendation and amplification systems**

Regulators should require Meta to ensure that recommendation engines, search features and group suggestions do not surface or amplify content linked to IWT, and to demonstrate through auditing that its measures are effective.

## **Intervene directly in Facebook groups**

Regulatory and enforcement responses should focus specifically on Facebook groups as high-risk spaces. They should require stronger pre-publication review for wildlife sale content, tighter controls on the creation and growth of buy-and-sell animal groups, verification and friction for repeat sellers and administrators, and more aggressive disruption of groups repeatedly linked to IWT.



The illegal wildlife trade has become a major digital market, fuelled by social media accounts promoting rare and desirable species and wildlife products. © Klaudia Radecka/NurPhoto via Getty Images

### **Require multilingual and multimodal proactive moderation**

Platforms should be required to deploy multilingual detection systems that combine text, image and behavioural indicators, including code words, product imagery, cross-posting patterns and signals of illicit trade. Meta's scale and cutting-edge technical capacity mean continued failure to moderate effectively across languages should not be accepted as an unavoidable or neutral limitation.

### **Make reporting and takedown systems effective**

Platforms should be required to provide a dedicated IWT reporting pathway, rapid review by trained moderation teams, clear outcome feedback, and escalation channels for trusted civil society organizations and expert flaggers. This process should be simple and streamlined so users can truly support content moderation efforts. Administrative penalties should apply where clearly illegal flagged content remains online beyond defined response windows.

### **Increase transparency and independent scrutiny**

Platforms should be required to publish consistent, independently reviewable data on detection, removals, repeat offenders, response times, languages and regional patterns, and to provide access pathways for qualified external researchers to assess whether enforcement systems are working. Without transparency, claims of self-regulation are meaningless and impossible to verify.

### **Coordinate internationally**

Governments should pursue alignment through international forums and cross-border enforcement cooperation, including shared expectations for platform responsibilities, trusted flagger frameworks, coordinated investigative action, and pressure on companies facilitating IWT at scale.



## CONCLUSION

**T**he ECO-SOLVE GMS, as a systematic global data collection mechanism, shows that Facebook's role in online IWT cannot be dismissed as incidental, localized or anecdotal. The central finding of this brief is not simply that IWT can be found on Facebook, but that Facebook has become the dominant public-facing infrastructure through which that trade is concentrated, encountered, transacted and monetized.

The evidence presented here suggests that Facebook's role in online wildlife trafficking extends beyond hosting and recommendation into monetization infrastructure. Meta's own published rules state that subscription monetization is conditioned on eligibility, policy compliance and review, yet this report documents a subscription-enabled page linked to a large poaching community. Where such accounts are able to operate on the platform, the contradiction is not simply between policy and user behaviour, but between Meta's stated enforcement claims and the outcomes documented in practice.

The GMS findings also show why this is a platform-governance problem, not just a user-behaviour problem. Most Facebook detections involved highly protected and internationally regulated wildlife. Much of this activity was concentrated in groups, encountered without active searching, and in some cases directly promoted to users by Meta's own systems. The trade is multilingual and transnational, and the GMS data shows that most of it is occurring in non-English languages, meaning that any credible moderation or enforcement response, whether internal or external, must also be multilingual.

Taken together, these findings leave little room for the argument that voluntary self-regulation is working. Facebook has had years of warnings, repeated external scrutiny, formal internal policies and public commitments to act. Yet the evidence presented here shows that the platform continues to function as a discovery tool, community infrastructure and commercial enabler for wildlife trafficking. This reflects a broader logic common to organized crime: illicit markets flourish where governance is weak, enforcement is uneven and access to consumers is easy. In the physical world, traffickers exploit poorly governed borderlands, ports and marketplaces. In the digital world, Facebook has come to serve an analogous function: a high-reach, low-friction environment in which buyers and sellers can find one another, build trust and transact with too little resistance.

That is why the recommendations in this brief focus not only on content removal, but on the recommendation systems, group architecture, moderation gaps, reporting failures and transparency deficits that allow the trade to persist.

Facebook can still choose to redesign these conditions and respond to meaningful oversight. If it does not, regulators should stop treating wildlife trafficking as an unfortunate by-product of user misuse and start treating it as a foreseeable and preventable platform-governance failure.



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