

Wildlife

Vietnam's Footprint in Africa

An analysis of the role of Vietnamese criminal groups in wildlife trafficking

November 2021



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ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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Front cover: Elephants and other African wildlife will vanish if urgent actions are not taken by Vietnam and relevant countries to tackle transnational wildlife trafficking

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Above: Following population declines over several decades due to poaching for ivory and loss of habitat, in March 2021, the African forest elephant (*Loxodonta cyclotis*) and the African savannah elephant (*Loxodonta africana*) were categorised as "Critically Endangered" and "Endangered" respectively on the IUCN Red List of Threatened Species™.

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Executive summary

For a decade, Vietnam has been repeatedly highlighted for its role in the international illegal wildlife trade, so it is encouraging to see the recent efforts taken by the Government to address its involvement; it is to be congratulated for the measures it has taken and the successes it has had domestically.

Yet despite these efforts to tackle illegal wildlife trade in country, Vietnam's reputation is tarnished by the fact that it is the primary destination for illegal wildlife products sourced from across Africa and shipped by criminal networks directly or indirectly to meet the

demand in Vietnam and beyond. These networks are accelerating the decline of Africa's biodiversity and are exacerbating corruption and weak rule of law in many source and transit countries in the continent.



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Since 2010, there have been at least 120 wildlife seizures made at air and seaports in Vietnam involving elephant, pangolin and rhino horn; at least 51 per cent of these shipments originated from Africa and a significant number were high volume.

Large scale seizures at seaports amounted to more than 15 tonnes of ivory and 36 tonnes of pangolin scales since 2018, not one of these seaport cases has resulted in arrests or convictions – the perpetrators responsible have not been held accountable and the Vietnamese-led criminal groups involved in wildlife trafficking continue to operate with impunity outside of the country.

The failure to pursue intelligence-led investigations into these major seizures, even when detailed information and intelligence on some networks and the individuals involved has been presented to Vietnamese authorities

by a range of stakeholders, is a significant problem. It suggests that law enforcement is either inadequate or under-resourced and that there is lack of coordination between the agencies involved, including customs and police.

Of course, Vietnam cannot solve this problem alone and needs cooperation from governments in those countries where the criminal activities are taking place as well as from international agencies involved in tackling illegal wildlife trade and the corruption that underpins it. It is in this arena that Vietnam's next targeted efforts need to take place.

Opposite page: In the first six months of 2021, at least 249 rhinos were killed in South Africa, a 50 per cent increase in the number of rhino horn poached over the same time period in 2020

Above: Vietnamese authorities seized staggering 138kg of rhino horn originating from South Africa at Tien Sa port in July 2021 - an indicator of continued wildlife trafficking destined for Vietnam despite COVID-19 restrictions

Introduction

As the world reels from the impact of COVID-19, there is increasing recognition of the links between biodiversity loss and the resulting adverse impact on human health and the environment.

Illegal wildlife trade plays a key role in global biodiversity decline, reducing wild populations at an alarming pace and fuelling local extinctions; some elephant populations in West and Central Africa have declined dramatically or become extinct and, given current trafficking trends, pangolins are being pushed to the verge of extinction.

Despite the implications of the pandemic for international travel and transportation, wildlife crime networks have continued to operate in 2020-21, taking advantage of the disruption and quickly adapting to global developments. For example, at least 249 rhinos were lost to poaching in South Africa in the first six months of 2021, a 50 per cent increase in the number poached over the same time period in 2020, which the South African Government attributes to the lifting of COVID-19 lockdown measures.¹ Since January 2021, Nigeria seized approximately 19 tonnes of ivory and pangolin scales in three large seizures (with one confirmed to be destined for Vietnam), indicating that wildlife crime groups continue to smuggle illicit wildlife from Africa despite restrictions.

Vietnam has played a significant role in fuelling poaching and biodiversity decline across Africa. According to the United Nations Office on Drugs and Crime (UNODC), Vietnam is a primary shipping destination for illicit ivory, pangolins, rhino horn and rosewood and it is also a conduit for illicit wildlife entering China.²

Vietnamese wildlife crime networks have been operating in Africa for nearly two decades. Since 2010, based solely on confirmed global wildlife seizures, Vietnam has been implicated in the trafficking of the parts and products of at least 18,000 elephants, 111,000 pangolins and as many as 976 rhinos. These alarming figures represent only a fraction of the actual levels of wildlife trafficking involving Vietnam because much of it takes place undetected.

Vietnamese crime groups are driving unsustainable exploitation of natural resources, exacerbating crime and corruption and exploiting weak governance and local communities along the supply and transport chain in Africa.

EIA investigations and research have revealed the role of Vietnamese wildlife crime groups in multiple African countries, including Angola, Cameroon, Democratic Republic of Congo (DRC), Mozambique, Nigeria, South Africa and Uganda; many of these countries are grappling with unsustainable levels of poaching and are

already bearing the brunt of high levels of other forms of organised crimes, insecurity and corruption.

This report focuses on the impunity with which Vietnamese crime groups operate in Africa to traffic wildlife and other natural resources from the continent to Vietnam.

While a number of commitments have been made by the Government of Vietnam to stem the flow of illegal wildlife into the country, many of these promises have yet to materialise.

It is recognised that Vietnam has made important progress in tackling wildlife crime, both in terms of improving as well as implementing relevant national legislation – for example, Vietnam's revised Penal Code, which came into effect on 1 January 2018 with significantly increased penalties for wildlife crime. There have also been a large number of cases resulting in deterrent penalties imposed on individuals convicted for wildlife crime offences.

These cases demonstrate that success is achievable through targeting the leaders of wildlife trafficking networks – now there is an urgent need to widen these efforts to disrupt the operations of several Vietnamese-led syndicates which remain active in Africa and Asia.

Under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Vietnam has been recognised as a country of major concern due to its role as a source, transit, and consumer country in the illegal trade in Appendix I and Appendix II species.

In August 2019 at the CITES Conference of the Parties, Vietnam was identified as the "leading destination for illicit ivory, surpassing China (including Hong Kong SAR)", where the situation in the country "has worsened considerably"⁷ and is "one of the Parties most affected by rhinoceros horn trafficking".⁸

Following a CITES decision to tackle its role in ivory and rhino horn trafficking, Vietnam developed a CITES National Ivory and Rhino Action Plan (NIRAP) under which it committed to strengthening international co-operation, undertake "continuous exchange of information on seizures" and "collaborate with source countries (Africa) to exchange information on solutions to improve the effectiveness of criminal legal assistance." However, there has been very little law enforcement cooperation between Vietnam and key African countries to target operations of Vietnamese-led wildlife crime groups in Africa.

In 2019, CITES requested that Vietnam show progress made in tackling wildlife trafficking at its border points and in its domestic markets, demonstrated by arrests, prosecution and convictions. While some progress

has been made within Vietnam, this is nowhere near commensurate with the industrial scale of wildlife trafficking that is taking place globally and which implicates Vietnam.

Kudos to Vietnam: Recognising progress made in tackling wildlife crime

Significant increase in penalties: Under Vietnam's new Penal Code provisions, which came into effect in January 2018, wildlife crime is treated as a "serious crime" as per the UN Convention Against Transnational Organised Crime (UNTOC) with maximum sentences of up to 15 years imprisonment and fines up to two billion VND (\$87,000) for individuals and fines up to 15 billion VND (\$659,000) for companies. For example, a wildlife trafficker was given a record 12-and-a-half year jail term for smuggling 28.7kg rhino horn from Mozambique to Vietnam in December 2020.³

Increase in seizures, arrests and prosecutions: Under the new Penal Code framework, between 2018-19 the number of wildlife trafficking seizures increased by 44 per cent. In the first six months of 2020, 97 per cent of wildlife trafficking cases resulted in arrests and 68 per cent of convictions resulted in custodial sentences. During the same period, the average prison sentence for wildlife traffickers was four-and-a-half years, an increase of approximately a 360 per cent compared to 2017, when the average imprisonment sentence was 15 months.⁴

Convictions of major wildlife traffickers: Since 2018, four major wildlife traffickers in Vietnam have been prosecuted, resulting in dismantling of their network.⁵ These include: Nguyen Mau Chien, sentenced to 23 months' imprisonment for rhino horn, ivory and tiger trafficking in September 2020; Nguyen Van Nam, sentenced to eight years for ivory trafficking in July 2020; Nguyen Huu Hue, sentenced to six years for tiger trafficking in January 2020; and Hoang Tuan Hai, jailed for four years and six months for marine turtle trafficking in 2018.

First prosecution of a case involving African pangolin scales: The first prosecution under the new Penal Code of a case involving African pangolin scales took place in June 2021. The defendant was sentenced to five years and three months in prison for possession of 780kg of African white-bellied and Temminck's pangolin scales.⁶

Below: In September 2020, a major wildlife trafficker, Nguyen Mau Chien, was convicted to 23 months imprisonment in Vietnam



Empty promises: Lack of progress in turning commitments into action

1994: Vietnam becomes a Party to CITES

2011: Letter of intent on police cooperation signed by Vietnam and South Africa

2012: Vietnam ranked 'worst in wildlife crime'⁹

2012: Vietnam is reported as driving "rapacious illegal trade in rhino horn"¹⁰

2012: Vietnam and South Africa adopt agreement for cooperation on wildlife trafficking (expired in 2017)

2012: Vietnam and South Africa negotiate a draft Mutual Legal Assistance Agreement in criminal matters which has not yet been signed or ratified and has therefore not come into force

2013: Vietnam identified as a country of 'primary concern' under CITES and, in response, submits a National Ivory Action Plan (NIAP) with commitments to tackle ivory trafficking¹¹

2014: Vietnam's Prime Minister issues a directive (No. 3/CT-TTG 2014) calling for enhanced enforcement against illegal wildlife trade

2016: Nhi Khe, Vietnam exposed as major wildlife trafficking hub¹²

2016: Vietnam emerges as one of the largest importers of illegal ivory¹³

2016: Vietnam hosts global high-level Conference on Illegal Wildlife Trade in Hanoi¹⁴

2016: Vietnam's Prime Minister issues another directive (No. 28/CT-TTG 2016) calling for strengthening enforcement efforts against illegal wildlife trade

2017: Vietnam and Mozambique adopt two Memoranda of Understanding on cooperation for the protection and conservation of wildlife and strengthening cooperation in prosecuting and combatting transnational organised crime.

2018: Vietnam submits National Ivory and Rhino Horn Action Plan (NIRAP) to CITES

2018: Vietnam and Mozambique adopt Mutual Legal Assistance Treaty to facilitate law enforcement cooperation, which came into effect in September 2020

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2018: Vietnam and South Africa adopt a Memorandum of Understanding on cooperation to combat transnational organised crime and provide faster and more effective judicial assistance in criminal matters

2019 (Jan) to 2020 (May): There is no functioning CITES Scientific Authority in Vietnam, in flagrant violation of the CITES Convention. Any CITES permits issued during this period are illegal/non-compliant with CITES

2019: Vietnam and Mozambique adopt two agreements on Extradition and the Transfer of Sentenced Persons which came into effective in May 2021

2019 (Mar): World's largest ivory seizure (9,120 kg) takes place in Vietnam, originating from the Democratic Republic of Congo¹⁵

2019 (Apr): World's largest (12.9 tonnes) and second largest (12.7 tonnes) seizures of pangolin scales take place in Singapore en route from Nigeria to Vietnam

2019: Vietnam identified as largest import hub of ivory and pangolin scales

2019 (Aug): CITES requests that Vietnam strengthen law enforcement cooperation with relevant countries, including through joint investigations and operations

2020 (July): Vietnam's Prime Minister issues yet another directive (No. 29/CT-TTg) to improve efforts to tackle wildlife trafficking

2020-21: Illegal wildlife destined for Vietnam implicating Vietnamese crime groups continues to take place during the COVID-19 pandemic:

- > **2020 (Jan):** Singapore authorities seize eight rhino horns from a South African national travelling to Vietnam¹⁶
- > **2020 (Nov):** Vietnamese national travelling to Vietnam intercepted attempting to smuggle five rhino horns (weighing 4.3kg), 36 lion teeth and 127 lion claws through Maputo International Airport, Mozambique¹⁷
- > **2021 (Jan):** Nigeria seizes more than 10 tonnes of ivory, pangolin and endangered wildlife en route to Hai Phong, Vietnam, from Apapa port¹⁸
- > **2021 (May):** Angolan authorities seize 20kg of ivory from a Vietnamese national in Chibemba¹⁹
- > **2021 (July):** World's eighth largest rhino seizure (138kg) originating from South Africa takes place in Vietnam

Below: An elephant that has been killed by poachers in Kenya



Impact of organised crime on Africa's wildlife

Fuelled by demand in Asia, the criminal activities of Vietnamese-led wildlife crime syndicates documented across Africa are having a catastrophic impact on endangered wildlife species which serve key ecological functions, including elephants, pangolins and rhinos.

EIA investigations and research indicate that Vietnamese-led syndicates are active in African countries which are experiencing massive population declines of elephant, rhino and pangolin species to poaching and illegal trade.

Elephants

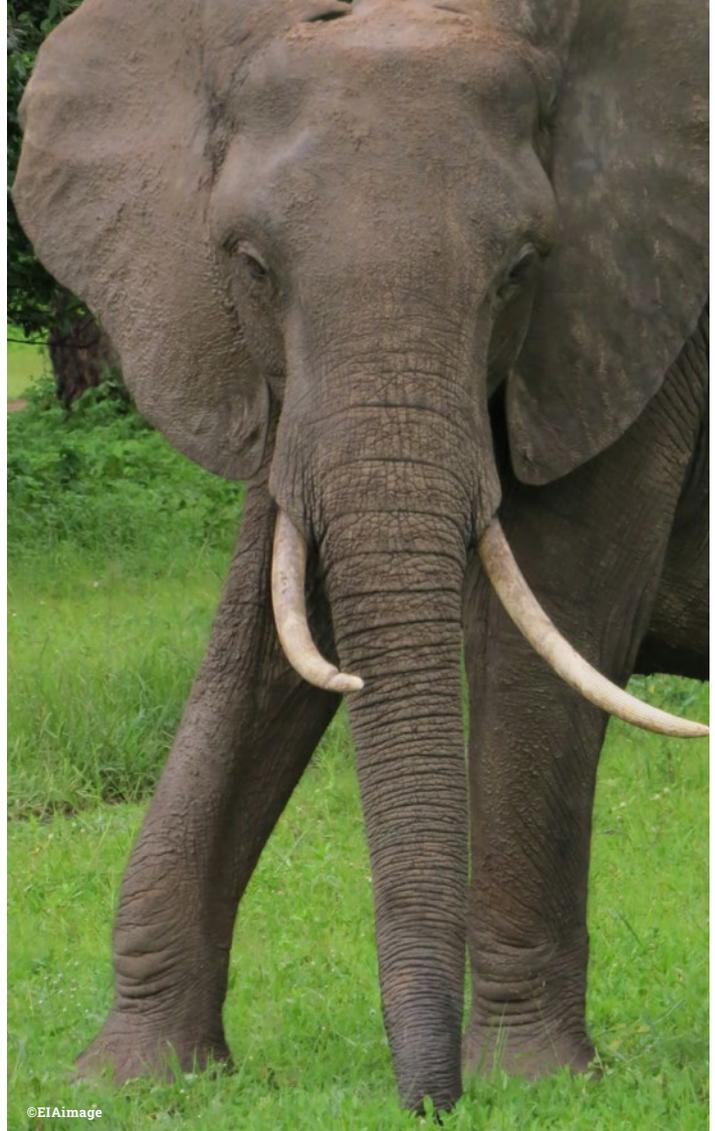
In March 2021, the International Union for the Conservation of Nature (IUCN) assessed that both the African forest elephant (predominantly found in West and Central Africa) and the African savannah elephant (predominantly found in Eastern and Southern Africa) are closer to extinction than previously assessed.

Where previously the IUCN conservation status of African elephants was "vulnerable", African savannah elephants have now been classified as "endangered", meaning they face a very high risk of extinction in the wild, while African forest elephants are listed as "critically endangered" and face an extremely high risk of extinction in the wild.²⁰

According to the IUCN, poaching to feed the illegal ivory trade is currently a major threat to African elephants.²¹ African forest elephant populations declined by more than 60 per cent between 2002-11, while between 2007-14, African savanna elephant populations declined by 30 per cent, with an estimated current decline rate of eight per cent a year.²²

While some progress has been made to close domestic ivory markets and improve enforcement, the continued downward population trends of both species is of the utmost concern given ongoing poaching and trafficking activities throughout the continent.²³

Vietnamese syndicates are operating across Africa in countries which are grappling with elephant poaching and small elephant populations, a possible indicator of the extent and impact of their illegal activities.



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This is especially evident in Mozambique, where EIA investigations previously revealed that Vietnamese criminal syndicates were responsible for large-scale trafficking operations destined predominately for Vietnam, which is the leading destination for illicit ivory.²⁴ For example, between 2010-15, Mozambique's elephant population declined by a staggering 48 per cent from 20,000 to 10,300 due to poaching fuelled by Vietnamese and other wildlife crime groups.²⁵

Pangolins

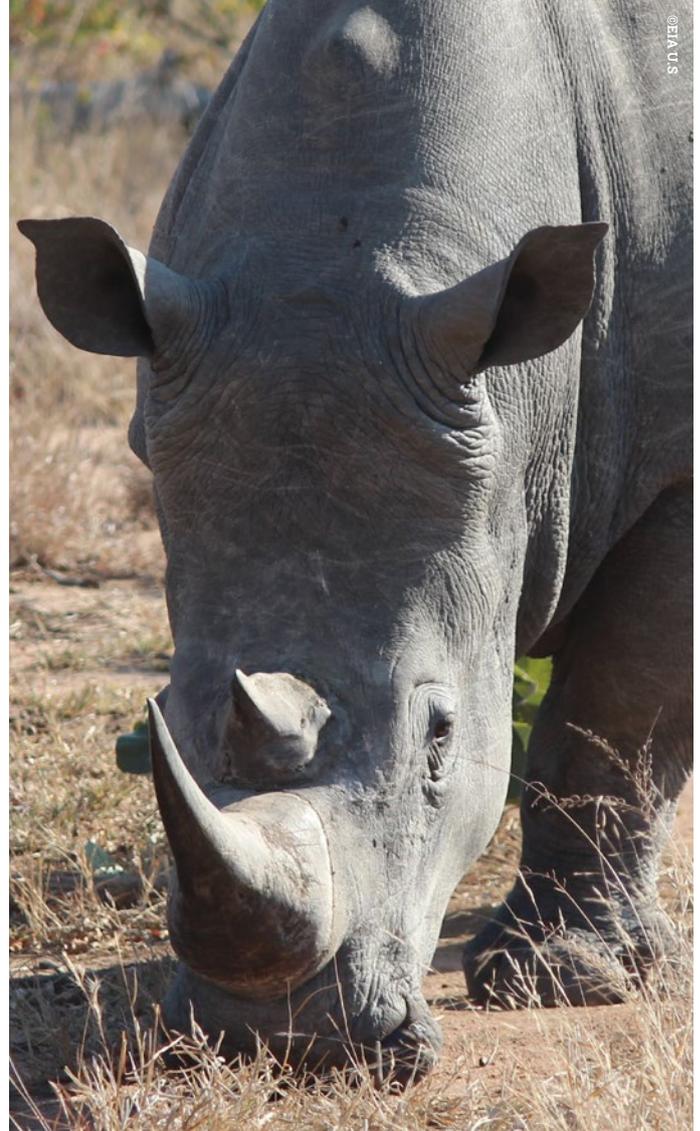
Despite being the most trafficked mammal in the world and falling victim by the tens of thousands to criminal networks, including Vietnamese-led syndicates, information about pangolin populations is elusive. This is mainly due to the lack of field surveys and the difficulties in detecting pangolins in their habitat.

Given the lack of data and the extremely high levels of illegal trade in pangolin scales, there is uncertainty as to just how many pangolins remain in the wild, underscoring the urgency with which policymakers and law enforcement authorities must act to save the species from extinction. Estimates suggest that if current levels of illegal trade and consumption continue, pangolins are being pushed to the brink of extinction.²⁶

Since 2008, there has been a dramatic increase in the inter-continental trafficking of pangolins from Africa to



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Asia.²⁷ In 2016, all eight species of pangolins were given the highest level of protection under CITES, making it illegal for them to be traded internationally. In 2019, the worsening plight of pangolins was confirmed when IUCN reclassified three pangolin species – two African and one Asian – into higher categories of extinction risk.²⁸ All three pangolin species found in West and Central Africa are in decline and the serious risk they face from illegal trade has been demonstrated by several large-scale pangolin seizures in Vietnam which have been traced back to Nigeria, Cameroon and DR Congo.²⁹

Rhinos

Vietnam has played a significant role in the devastation of rhino populations in Africa. Rhino poaching began to increase in South Africa and other rhino range states in 2006 after Vietnamese nationals started exploiting weak trophy hunting laws and corruption in South Africa to engage in 'pseudo hunting' whereby trophy hunts would be conducted with the sole purpose of taking the horns back to Vietnam to sell on the black market.³⁰

During 2010-20, at least 9,885 rhinos have been poached across Africa.³¹ South Africa, home to the vast majority of Africa's rhinos with an estimated 18,067 white rhinos and 5,495 black rhinos, accounted for nearly 88 per cent of all rhinos poached during this decade.³² Most of the rhino poaching in South Africa has been concentrated in Kruger National Park, which saw its white rhino population plummet by more than two-thirds during

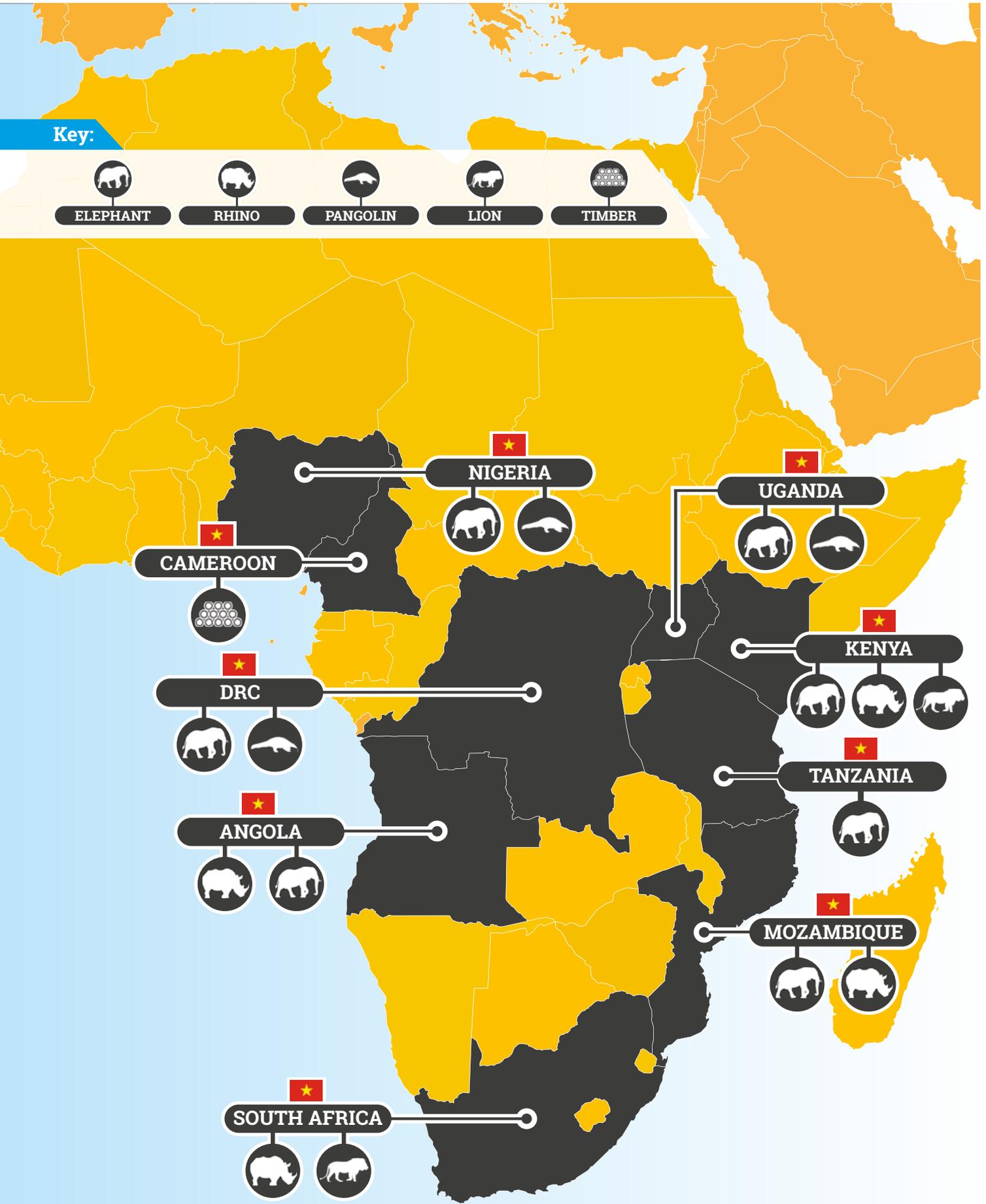
the past decade from 10,621 to just 3,549.³³ The Kruger's critically endangered black rhino population also suffered devastating declines, with just 268 left in the park, down from more than 400 in 2013.³⁴

Wildlife trafficking continues to threaten rhinos, with at least 249 rhinos lost to poaching in South Africa in the first six months of 2021. More than half of those killed were in Kruger National Park.³⁵ This represents a 50 per cent increase in the number of rhinos poached over the same time period in 2020, which the South African Government attributes to the lifting of COVID-19 lockdown measures.³⁶

In neighbouring Mozambique, no more than three dozen white rhinos remain today,³⁷ most of which are likely transients from South Africa which have crossed the unfenced border between Kruger National Park and Mozambique's Limpopo National Park. Yet despite having a very small rhino population, Mozambique is a major trafficking hub for horn sourced in South Africa and other range states destined for Vietnam.

Vietnamese nationals have also been implicated in the trafficking of rhino horn from Namibia. Rhino poaching rose sharply in Namibia in 2015 when 97 rhinos were killed, compared to just four lost in 2013.³⁸ During the subsequent five years, the number of rhinos poached annually fluctuated between 55 and 81.³⁹

Figure 1: Vietnamese wildlife crime networks have been operating in multiple African countries



Vietnamese-led wildlife trafficking in Africa

Vietnamese wildlife crime networks have been operating in Africa for nearly two decades, accelerating the destruction of Africa's natural resources.

Since 2010, Vietnam has been implicated in more than 700 seizures amounting to at least 123 tonnes of ivory, 111 tonnes of pangolin scales and 2.7 tonnes of rhino horn, 75 per cent of which by weight originated from Africa.⁴⁰

The operations of Vietnamese networks in Africa began with illegal trade in rhino horn and big cat bones in South Africa in the mid-2000s, followed by elephant ivory and pangolin scales sourced and/or trafficked through multiple African countries.

Between 2013-21, there has been a growing convergence between the trafficking of pangolin scales and elephant ivory. Since 2018, at least 56 tonnes of pangolin scales and 27 tonnes of ivory have been jointly seized from 13 large shipments (weighing more than 500kg) originating from Africa and implicating Vietnam.⁴¹

These illicit wildlife products are sourced to meet the demand in Vietnam where consumers of traditional medicine believe that rhino horn and pangolin scales can cure illnesses such as cancer and ensure healthy reproduction respectively.⁴² Rhino horn and ivory are also perceived to be status symbols and are used as luxury gifts by the middle to upper income classes.⁴³ In addition, as a key transit hub for wildlife products, large amounts of African ivory, rhino horn and pangolin scales have been smuggled onward through land border crossings from Vietnam to end markets in China.

South Africa

Vietnam used to be home to the critically endangered Javan rhino species; however, the last Javan rhino was shot by suspected poachers at Cat Tien National Park in southern Vietnam and rhinos were confirmed extinct in Vietnam in 2011.⁴⁴

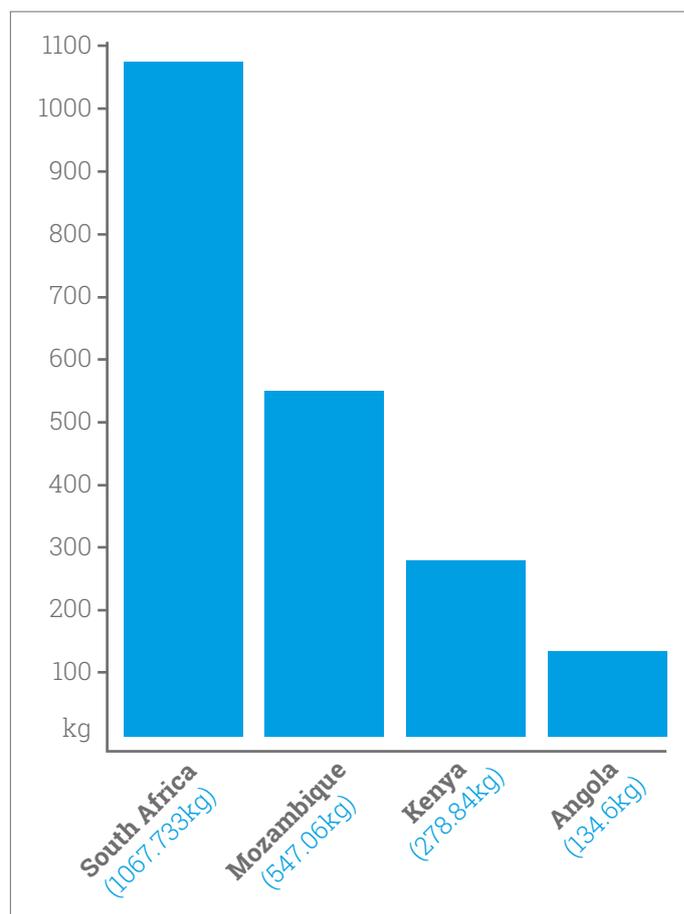
With South Africa having the largest rhino population in Africa, weak law enforcement and a trophy hunting industry vulnerable to corruption and abuse, Vietnamese crime groups turned their attention to the continent where they became involved in sourcing rhino horn from South Africa.

Since 2010, Vietnam has been implicated in the confiscation of approximately 1,970kg of rhino horn originating from Africa, of which 1,067kg or 54 per cent was linked to South Africa. Between 2007-20, at least 31 Vietnamese nationals have been arrested and/or convicted in South Africa for illegal possession of rhino horn, ivory, lion bone and tiger bone.⁴⁵ Rhino horn is commonly trafficked by air, with the majority of cases occurred at the OR Tambo International Airport for flights destined for Vietnam.

EIA investigations conducted between 2016-18 uncovered a well-organised crime network led by Phan Viet Chi, a notorious Vietnamese ivory and rhino horn trafficker based in South Africa.⁴⁶ His syndicate regularly bought ivory and rhino horn sourced from South Africa and Mozambique for trafficking to Vietnam through Mozambique's Maputo port – for example, in 2015 it is believed that Chi's syndicate successfully smuggled 13.5 tonnes of ivory in three shipments to Vietnam.

Despite the COVID-19 pandemic, rhino horn trafficking continues to take place between South Africa and Vietnam. In July 2021, authorities at Da Nang port in Vietnam seized a staggering 138kg of rhino horn, representing up to 50 rhinos, together with 3.1 tonnes of lion bone shipped from South Africa. Large scale shipments are considered to be one of the indicators of organised criminal activity. This seizure was the largest consignment of rhino horn seized in Vietnam since 2015 and underscores the role of well-organised crime groups involved in trafficking wildlife into Vietnam. At the time of writing, no arrests had been made in connection to this case.

Figure 2: Top African countries linked to rhino horn imported to Vietnam since 2010



Mozambique

The role of Vietnamese organised crime groups implicated in trafficking large quantities of ivory and rhino horn from Mozambique and South Africa to South-East Asia is well-documented.⁴⁷

Vietnamese syndicates are known to run operations in Maputo for sourcing, packing and exporting ivory and rhino horn to Vietnam. In many cases, hollowed logs and sawn timber are used as concealment methods and bribes are paid by Vietnamese groups to Mozambican officials to facilitate their operations.⁴⁸ These syndicates are also aided by corrupt officials at Vietnamese embassies in Mozambique⁴⁹ and South Africa.⁵⁰

Mozambique is the third largest country implicated in smuggling ivory from Africa into Vietnam, with approximately 15 tonnes of ivory trafficked since 2010.⁵¹ Since 2010, Mozambique has been implicated in seizures of at least 547kg of rhino horn linked to Vietnam, representing up to 197 rhinos.⁵² Between 2012-20, at least 11 Vietnamese nationals were arrested at Maputo international Airport for possession of rhino horn and lion products.

Tanzania

Prior to 2017, Tanzania lost more than 60 per cent of its elephants⁵³ and was significantly exploited by wildlife traffickers to smuggle ivory to Asia via Vietnam.

EIA investigations between 2014-17 documented a Chinese-led wildlife trafficking network which used Vietnam as a shipping destination for ivory and other illicit wildlife exported from Tanzania and Mozambique.⁵⁴ Hai Phong seaport in northern Vietnam was a common destination for several tonnes of ivory originating from Tanzania.

Between 2004-16, Tanzania was implicated in 17.5 tonnes of ivory linked to Vietnam. In 2017, authorities in Vietnam arrested Nguyen Mau Chien, head of a Vietnamese network involved in trafficking wildlife from Africa to Asia who was previously arrested and convicted in Tanzania for smuggling wildlife products in 2007.

Kenya

Prior to 2019, Kenya was a common transit route exploited by Vietnamese networks for trafficking rhino horn along with ivory and lion products from Africa to Asia. Between 2013-18, at least 17 Vietnamese nationals have been arrested in relation to wildlife crime, the majority of which took place at Jomo Kenyatta International Airport. These suspects were carrying illicit wildlife from multiple countries, including Angola, DR Congo, Liberia, Mozambique and Tanzania, to Kenya for onward shipment to Asia.

Similar to the modus operandi with rhino horn trafficking, worked ivory was also carried by air passengers departing from Jomo Kenyatta Airport while larger quantities of raw ivory were shipped from Mombasa seaport in Kenya to Vietnam. Since 2010,

Kenya has been implicated in at least 11.5 tonnes of ivory linked to Vietnam, the majority of which was shipped from Mombasa through Singapore and Hong Kong.

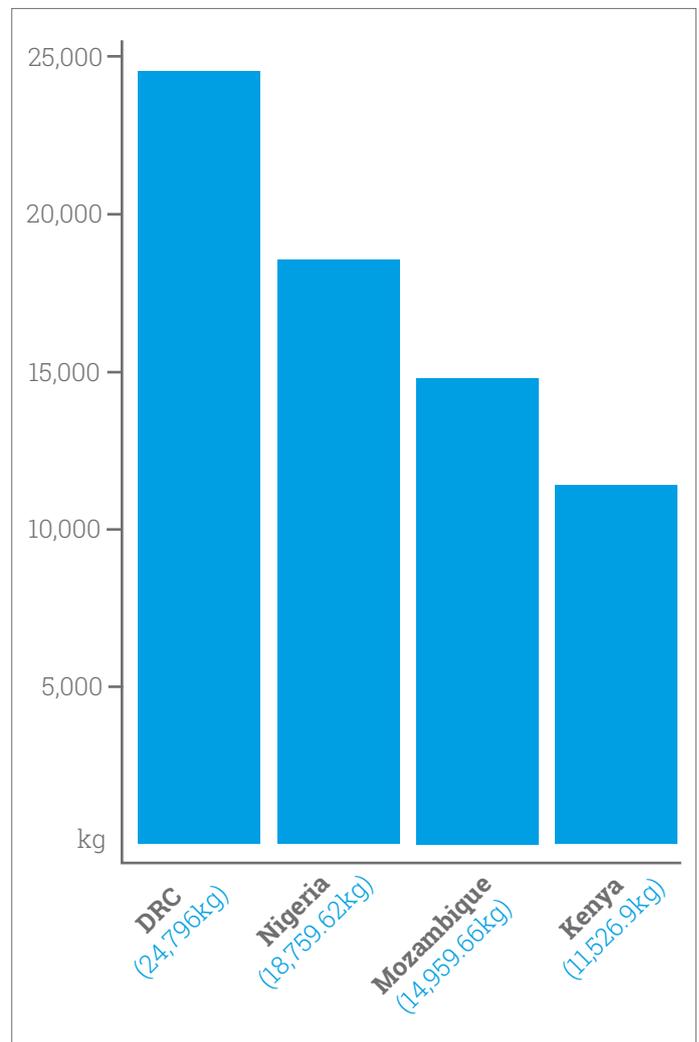
The largest ivory case originating from Mombasa en route to Vietnam involved the confiscation of 4.6 tonnes of ivory in Singapore in 2015 which had been declared as tea leaves; the freight forwarder of this shipment was fined for failure to exercise due diligence by Singaporean authorities.

At the time of writing, there have been no further updates on prosecution of any other individuals or companies responsible for the shipment, even though the entire shipment was destroyed by Singapore in June the following year.⁵⁵

Since 2016, there have been no reported large-scale seizures in Mombasa outbound for Asia, including Vietnam, which could possibly be due to improved detection at the port and/or the shift of trade routes from East to West Africa, mainly through Nigeria.⁵⁶

However, given the significant quantities of illegal ivory trafficked through Mombasa, there remain concerns about the vulnerability of the port for exploitation by wildlife trafficking networks, particularly due to persistent issues related to corruption and weak enforcement.⁵⁷

Figure 3: Top African countries linked to ivory imported to Vietnam since 2010



Uganda

Uganda is a major trafficking hub for ivory and pangolin scales sourced from Central and Eastern Africa.⁵⁸

Since 2010, authorities in Uganda have intercepted more than 16 tonnes of ivory and four tonnes of pangolin

scales, mainly originating from or transiting through neighbouring countries, including Burundi, DR Congo and South Sudan, and implicating Vietnam.

Since 2015, at least 11 Vietnamese nationals have been arrested in Uganda for illegal trade in ivory, pangolin scales and rhino horn.

Uganda: Missed opportunity to disrupt a major Vietnamese wildlife crime network

In January 2019, officers from the Uganda Revenue Authority (URA) intercepted a consignment containing logs which had been hollowed out and filled with paraffin wax to conceal 762 pieces of ivory weighing 3,299kg and more than 423kg of pangolin scales. This is the largest seizure of ivory made in Uganda to date.

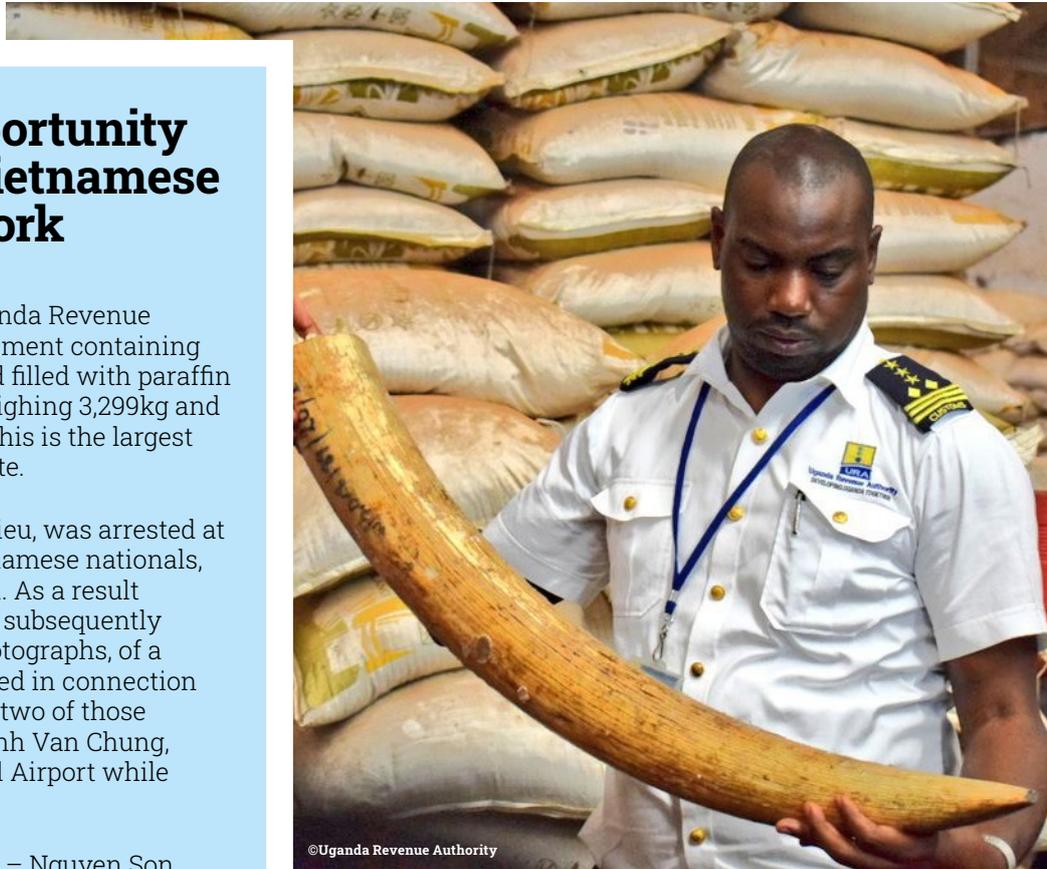
A Vietnamese national, Pham Van Chieu, was arrested at the scene, followed by two other Vietnamese nationals, Nguyen Son Dong and Phung Thi Lien. As a result of information they received, the URA subsequently released a public notice, including photographs, of a further 18 Vietnamese nationals wanted in connection with the investigation. In March 2019, two of those on the list, Nguyen Van Thanh and Dinh Van Chung, were arrested at Entebbe International Airport while attempting to leave Uganda.

Ultimately, four Vietnamese nationals – Nguyen Son Dong, Pham Van Chieu, Phung Thi Lien and Dinh Van Chung – were charged with offences including possession and utilisation of wildlife products under the East African Community Customs Management Act 2004 and Uganda Wildlife Act, initially heard in the Uganda High Court, Anti-Corruption Division.⁵⁹

In the two-and-a-half years that followed, the prosecution process crumbled as hearings were repeatedly postponed, in part due to the COVID-19 pandemic but also as interpreters were unavailable and court officials were committed elsewhere. The defendants, released on bail, absconded and prosecutors were compelled to adjourn the case indefinitely pending their re-arrest.

With the defendants scattered, it appears the case is left in limbo. The narrow scope of the investigation, limited co-operation between Uganda and Vietnam, and the protracted progress of the court proceedings have resulted in a missed opportunity to identify and disrupt the wider Vietnamese syndicate thought to be involved in this case.

Above right, and right: In 2019, Ugandan authorities seized approximately four tonnes of ivory and pangolin scales and arrested Pham Van Chieu and Nguyen Son Dong for their involvement in the case



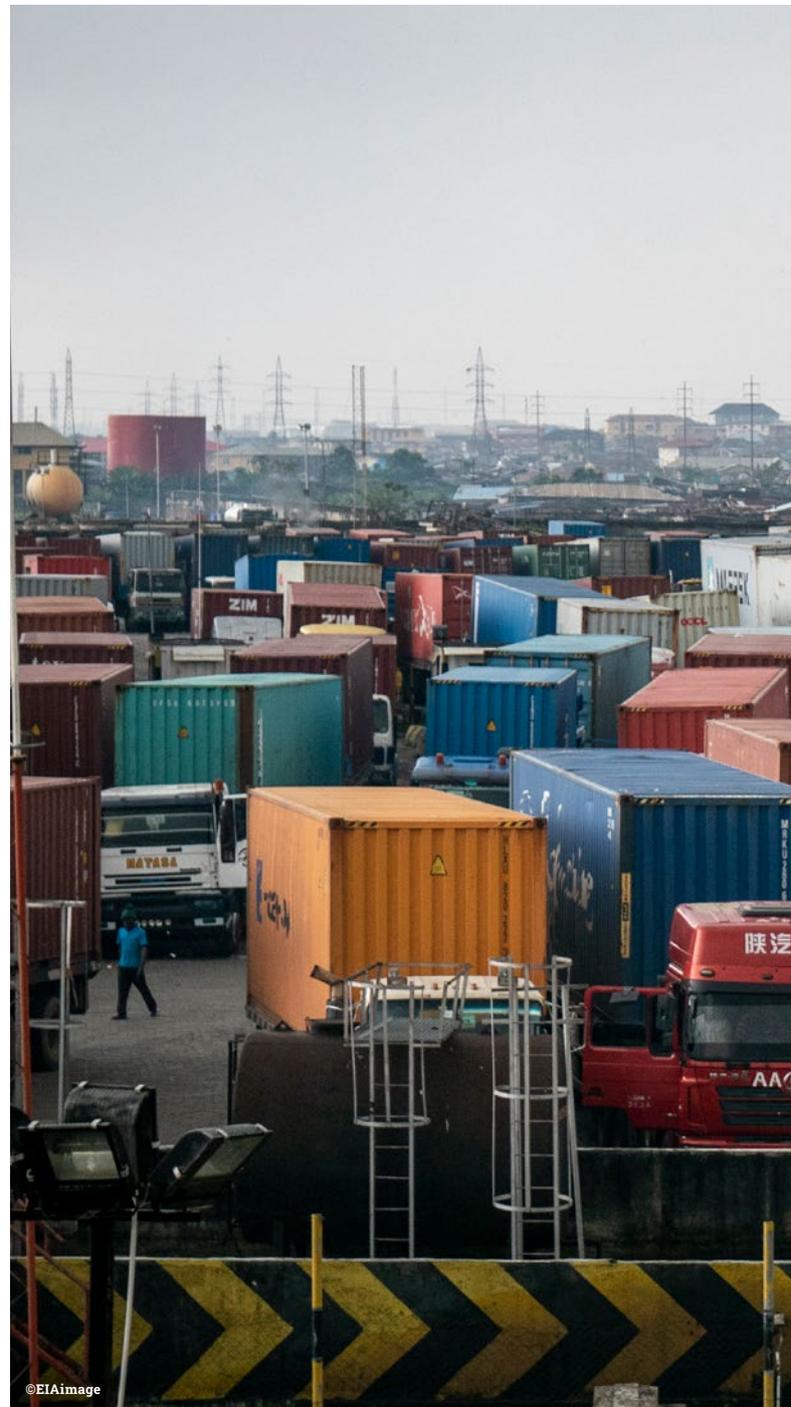
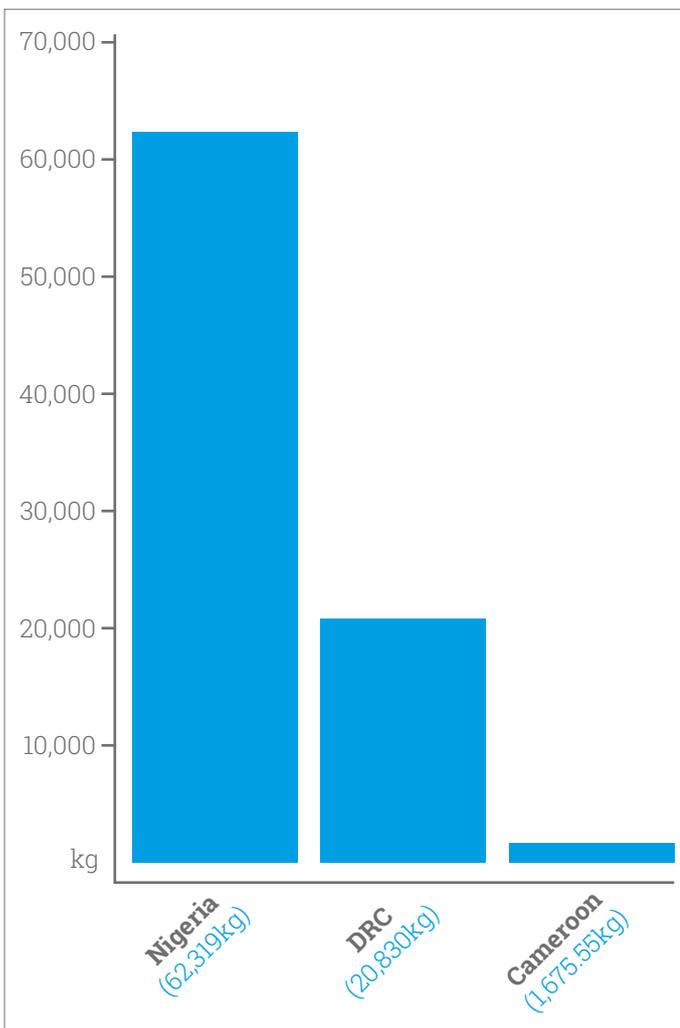
Angola

Since 2015, Angola has emerged as a country of concern for rhino horn trafficking into Vietnam through airports. This trend coincided with concerning levels of rhino poaching in neighbouring Namibia where Vietnamese nationals have also been implicated in the trafficking of rhino horn from Namibia into Angola.

There have been at least 10 seizures of rhino horn originating from Angola, amounting to 134kg. During the pandemic, more than 60kg of rhino horn was seized between December 2020 and March 2021 from passengers arriving on emergency repatriation flights from Angola to Vietnam.⁶⁰

Angola has also been exploited by Vietnamese syndicates for trafficking ivory. Since 2012, at least 43 Vietnamese nationals have been arrested globally for trafficking ivory from Angola to Asia. In August 2018, five Vietnamese nationals were arrested in relation to a seizure of approximately 800kg of ivory, 900kg of pangolin scales and 27 pieces of rhino horn in the capital of Luanda, Angola.⁶¹ The seizure also uncovered two ivory processing workshops run by the Vietnamese group. It is believed that the offenders were part of an organised Vietnamese network operating in Angola. At the time of writing, there are no further updates on the prosecution of the suspects.

Figure 4: Top African countries linked to pangolin scales imported to Vietnam since 2010



DR Congo

DRC is the top country implicated in ivory seizures en route to Vietnam from Africa, with approximately 25 tonnes of ivory seized since 2015 (accounting for 27 per cent of ivory originating from Africa to Vietnam).

The majority of these seizures were made in Asia, demonstrating that there has been inadequate detection from exit ports in DR Congo. This includes the world's largest ivory seizure (9,120kg), made in Vietnam, and the second largest ivory seizure (8,795kg), made in Singapore, both originating from DR Congo in 2019.

In terms of illegal pangolin trade, DR Congo is the second largest country implicated in smuggling pangolin scales from Africa to Vietnam, with approximately 21 tonnes seized since 2015.



Nigeria

In West Africa, Nigeria has become the world's largest exit point for ivory and pangolin scales exported from Africa to Asia since 2015.⁶² Nigeria is also the primary African country implicated in ivory and pangolin scale seizures destined for Vietnam with 19 tonnes and 62 tonnes respectively (accounting for 21 per cent of ivory and 73 per cent of pangolin scales originating from Africa to Vietnam).⁶³

In 2019, a record year for high volume pangolin scale seizures, Vietnam was the shipping destination for the world's three largest pangolin scale seizures – all of which were made in Singapore en route from Nigeria and DR Congo. The UNODC has also highlighted Vietnam's key role as a conduit for pangolin scales entering China.⁶⁴

Apapa port in Lagos is a key exit point for smuggling ivory and pangolin scale shipments to Vietnam. Although traders can send shipments directly from Nigeria to seaports in Vietnam, including Hai Phong, Da Nang and Sai Gon, most syndicates choose to use transshipment and/or transit locations such as Singapore and Malaysia to conceal the final destination and avoid detection.

Despite the pandemic, there has been continued sourcing, stockpiling and exporting of large volumes of ivory and pangolin scales from Nigeria. This was exemplified by a major seizure of ivory and pangolin scales destined for Vietnam in January 2021, followed by two other large-scale seizures in July and September.

Above: Container terminal at Apapa port in Nigeria which has been exploited by Vietnamese wildlife crime networks for smuggling wildlife shipments to Asia

Snapshot: Booming Vietnamese-led timber trafficking from Cameroon

Historically, Vietnam used to rely on log imports from neighbouring Cambodia and Laos for its expanding timber processing industry. However, with depleting timber resources and some improvements in regulations and law enforcement in the region, Vietnamese networks began shifting their operations to Africa in 2015.⁶⁵

An investigation by EIA US has documented several Vietnamese syndicates which are exploiting Cameroon's weak national forest governance framework through illegal harvesting of logs, money laundering and fraud in violation of several Cameroonian laws.⁶⁶ It has been reported that at least 132,000m³ of logs were exported from

Cameroon to Vietnam between January 2016 and July 2020 in violation of Cameroonian log export restrictions.⁶⁷

This is a major challenge to the new Vietnamese Timber Legality Assurance System (VNTLAS), which came into force on 30 October 2020. VNTLAS is a central building block of the Voluntary Partnership Agreement (VPA) signed between the European Union and Vietnam in 2018, aimed at ensuring that only legal timber enters Vietnamese supply chains and, subsequently, domestic and international consumer markets.

Below: A log yard of a Vietnamese-led timber company operating in Cameroon in violations of Cameroonian timber export and labour laws



Snapshot: Tiger and lion bone trade from South Africa

In South Africa, it is legal to breed lions and tigers for commercial trade in their parts and derivatives,⁶⁸ although very recently the Minister for Environment promised to end the practice of breeding lions for commercial purposes.⁶⁹

Between 2008-16, an estimated 6,058 lion skeletons weighing 70 tonnes were exported from South Africa.⁷⁰ In June 2018, South Africa proposed an increase in its export quota for lion skeletons, from 800 to 1,500 annually,⁶⁸ but this was reduced to 800 following widespread criticism⁶⁹ and then subsequently halted following a court ruling stating the quota system was unlawful.⁷³

In many cases, lion bones are known to have been sold as tiger bones to less-discerning buyers in Asia,⁷⁴ undermining efforts to end illegal tiger trade and exacerbating the serious threat posed by trade to the fewer than 4,000 endangered tigers remaining in the wild in Asia.

Since mid-2000s, Vietnamese syndicates have been securing a foothold in tiger and lion breeding activities in South Africa. Chu Dang Khoa is a well-known Vietnamese wildlife trader who is believed to own Voi Game Lodge, in Klerksdorp in north-west South Africa. This facility has been reported to have 50 tigers and a number of lions in captivity⁷⁵ and has been implicated in 'legal' lion bone shipments directly to Vietnam.⁷⁶ In 2019, Khoa's farm was implicated in the seizure of 100 rhino horns and four tiger carcasses. Two Vietnamese nationals were

arrested alongside one South African national in connection with this case.

In 2018, it was reported that Vietnam was South Africa's largest commercial importer of lion bone, involving 607 lion skeletons.⁷⁷ Further, Vietnam has also imported live tigers from South Africa's captive population of more than 450 tigers⁷⁸ for commercial and zoo purposes.⁷⁹

Tigers are not endemic to South Africa and it is a serious concern that tiger 'farming' and trade continues to take place under weak laws and poor enforcement in the country.⁸⁰ This is a key area of concern which will be examined under proposed missions to Vietnam under the CITES framework.⁸¹

Vietnamese wildlife crime networks exploit legislative loopholes associated with legal lion breeding to smuggle tiger bones out of South Africa, mislabelled as lion bones.⁸² These syndicates also produce lion and tiger bone 'cake', a glue-like substance made by boiling lion and tiger bones with other ingredients for easier transportation from South Africa to Asia.⁸³

Given preferences for wild-sourced tiger parts among tiger consumers, the proliferation of lion and tiger farms in South Africa increases pressure on wild tiger populations by perpetuating demand, which in turn stimulates poaching.

Below: More than three tonnes of lion bones originating from South Africa were seized at Tien Sa port in July 2021



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Inside the world of a Vietnamese syndicate in Africa

Overview

EIA investigations and research starting in 2016 have uncovered the operations of the Viet Group (name anonymised, hereafter referred to as the Viet Group or the Group), a transnational organised crime group engaged in illegal trade in wildlife products, including ivory, pangolin scales and rhino horn, between Africa and Asia.

The Group was founded in a city in northern Vietnam in late 2000s by a well-known criminal in the region called Mr V and has been linked to several wildlife seizures. In 2012, the Viet Group started its operations in Africa with a view to sourcing wildlife itself and increasing its control of the illicit wildlife supply chain.

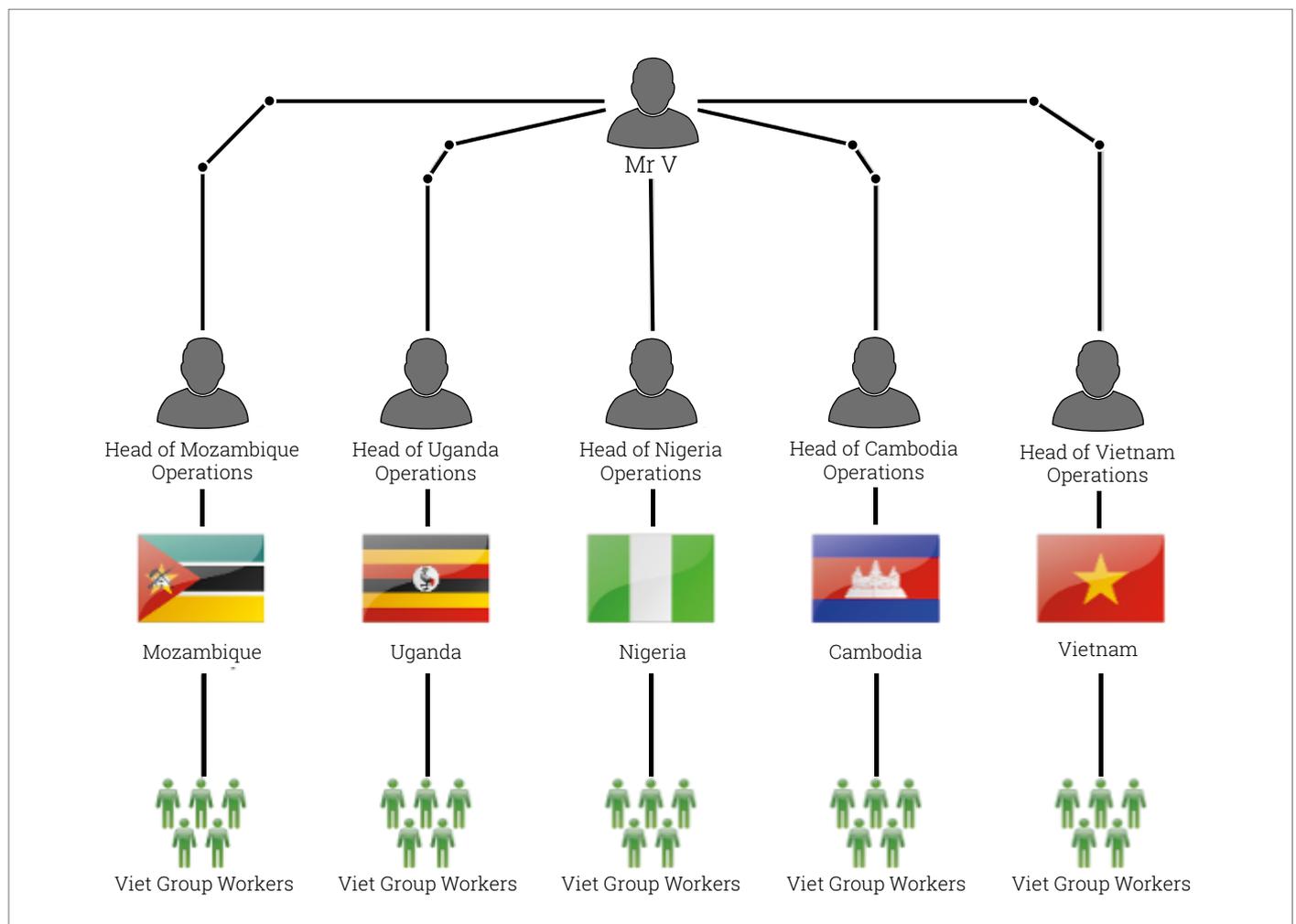
The first branch of the Group was established in Maputo, Mozambique, and others followed in Kampala in Uganda, Beira and Nampula in Mozambique and Lagos in Nigeria. The Viet Group is also believed to operate in other African countries, including Angola, DR Congo, Liberia, Madagascar, South Africa, Tanzania and Zambia. The Viet Group exercises significant control of the wildlife trafficking chain from Cambodia via Vietnam to China.

The Viet Group has a flexible structure in which the core membership is predominantly based on familial relationships supported by a fleet of workers. The syndicate's structure displays elements of a rigid hierarchy (a single leader with strong internal discipline with several tiers/divisions) and devolved hierarchy (regional structures, each with its own hierarchy and degree of autonomy), both characteristics of transnational organised crime groups.⁸⁴

Since 2016, the Viet Group has been linked to at least four large scale wildlife seizures (more than 500kg) amounting to 6.3 tonnes of ivory and 7.2 tonnes of pangolin scales, originating from Africa and destined for Vietnam.

The Group operates a complex corporate structure by establishing a number of companies in countries where it runs wildlife trafficking operations. These companies claim to operate in a variety of sectors, including import and export, construction, timber processing, plastic recycling, warehousing and real estate, and are registered to different members of the Group in order to avoid detection of illicit activities.

Figure 5: Structure of the Viet Group



Sourcing wildlife from across Africa

In Africa, members of the Viet Group cooperate with local suppliers in Mozambique, Uganda and Nigeria to source wildlife products for export to Asia.

In Mozambique, ivory sourced from within the country and its neighbours is consolidated in northern Mozambique before being smuggled down south to Maputo for export. In 2019, it is believed the group had access to approximately two tonnes of ivory, 150kg of rhino horn and 40-50 containers of timber stored throughout Mozambique.

Given that elephant and rhino populations in Mozambique have drastically declined due to poaching, the ivory and rhino horn sourced by the Group is believed to have originated from neighbouring Tanzania and South Africa.

In Uganda, the Viet Group works with suppliers who source ivory from DR Congo, Zambia and South Sudan for transportation to the capital of Kampala. In 2017, it is believed that the Group owned three tonnes of ivory stored in a location in Kampala. The Group's suppliers in Uganda are mostly West African nationals, who can also supply the Viet Group with timber from South Sudan and concealment fillers, such as end-of-life car batteries.

In Nigeria, the Group sources forest elephant ivory and pangolin scales primarily from across Cameroon for consolidation in Nigeria. Tusks are often cut into pieces for effective concealment and transportation. In 2018 the Group purchased approximately 15-20 tonnes of pangolin scales and 8-9 tonnes of ivory from just one supply source in Nigeria.

The Group's suppliers in Nigeria can also supply timber, charcoal and cotton wool to the Group for concealment purposes.

Use of intermodal transportation

In Mozambique, illegal wildlife products are regularly transported by road from source locations to the Viet Group's warehouses in trucks with timber. They are then transported to plastics factories for packaging before moving to international ports for shipping onward to Asia in containers declared as plastic waste. The use of intermodal transportation breaks the supply chain and reduces traceability.

The trucks are only driven by locals to reduce the risk of the arrest of Group members and to avoid robbery. Ivory and other wildlife products are commonly hidden inside hollowed timber logs. Once trucks arrive at the factories, the hollowed-out logs are burnt and the ivory is packed for shipment. It is known that the Group's factories in Mozambique are surrounded by high walls with secret locations for stockpiling illegal wildlife products.

In Nigeria, in order to avoid exposing the location of its warehouses the Viet Group ensures its suppliers do not transport illicit wildlife products directly to them – the Group meets its suppliers at an intermediate location and then transports the commodities to the warehouses themselves.

Below: Maputo port in Mozambique has been exploited significantly by the Viet Group to smuggle wildlife from Africa to Asia





Use of timber and plastics to conceal illicit wildlife

In African countries where the Group has operations, it established several companies and factories trading timber and recycled plastics to cover its illegal trade in wildlife. These companies function as consignors for shipments exported from Africa to Asia, where the Group's companies serve as consignees. The Viet Group owns warehouses which are used for storing and processing timber and plastic for concealment purpose. For its business security, the Group normally packs contraband for shipment itself in warehouses where stocks are consolidated, although they also sometimes hire suppliers who offer the service.

Between 2016-18, the Group was involved in seizures of ivory concealed by plastic bottles in Africa and Asia.

In September 2018, Vietnamese Prime Minister Nguyen Xuan Phuc issued a directive outlining urgent measures to strengthen the management, import and use of waste under which a plastic import permit is granted only to companies that directly use it as raw production material for their businesses.⁸⁵

It is possible that the Group has since decreased its reliance on plastic and used other fillers for concealment. Aside from timber and plastic, common products used by the Group include soybeans, corn, peanuts, fabric, cotton wool and charcoal.

Key role of clearing agents

To send shipments from Africa to Asia, the Group works with clearing agents who play a critical role. These agents are responsible for arranging the necessary paperwork and organising bribes to relevant government officials and all the agents involved in the shipping process. During this stage, the Group's translators act as key contacts to communicate with shipping agents.

The Group may use the agents' companies as the consignor's name on shipments but has also been known to use its own registered companies in-country. Maputo port in Mozambique is significantly exploited by the Viet Group for shipping wildlife between Africa and Asia. EIA intelligence indicates that the Group relies on strong connections to government officials in African countries to help facilitate its activities.

Between 2016-18, a number of the Viet Group's members were wanted by the Mozambique authorities in connection with a wildlife seizure at the Maputo port. They successfully escaped the country with the support of corrupt officials. Several other members of the Group also fled the country later thanks to travel documents provided by an associate who, allegedly, has close connections to the Vietnamese Embassy in Maputo.

In Asia, the Group has worked closely with its associates and allies to clear both air and sea cargos imported to Cambodia and Vietnam; the illicit goods are later smuggled onward to Vietnam and China by road.



Use of caution in communications to avoid detection

The Viet Group is known to operate under high levels of secrecy, with strict rules given to its members. For example, the Group's workers have been directed to turn off GPS/location services on their phones and to avoid interacting with members of other Vietnamese syndicates.

Vietnamese translators play an important role in the Group's trading activities in Africa as they regularly accompany key members in sourcing wildlife and arranging shipments for export. Between 2016-18, at least three translators have worked for the Group in Africa. In Asia, a member of the Viet Group spoke Mandarin fluently and could directly engage with Chinese buyers. The Group maintains contact with its suppliers, shipping agents and customers via secure messaging apps and social media.

Significant global financial flows

The Group transfers significant amounts of money from Vietnam to Africa through Chinese banks. In Africa, members of the Group make financial payments through formal banking institutions, but it is believed that international money transfer services have also been used to send money from Africa to Vietnam.

Payments for the illicit goods are commonly divided into multiple amounts and paid into different bank accounts owned by the Group's suppliers, either in US dollars or

local currencies such as Nigerian naira or Ugandan shillings, which is the preference of the Group members. One member of the Group and his associates once transferred 20 million Nigerian naira (\$50,000) each to a supplier in order to circumvent payment limits.

Impact of COVID-19

Due to the COVID-19 pandemic, a number of the Viet Group members have been unable to return to Africa since 2020; however, it is believed there will be an increase in wildlife trafficking from Africa to Vietnam as trade and transport restrictions ease globally. The Group remains active in South-East Asia and has also likely adapted to COVID-19 to carry out transactions remotely.

Above, left: Timber is the predominant concealment method used by Vietnamese crime networks for smuggling illegal wildlife products out of Africa to Asia

Above: Significant amounts of money have been transferred from Asia to Africa and within Africa for illegal wildlife trade activities by Viet Group



Missed Opportunities – Lack of action following significant large-scale seizures

In recent years, Vietnam has made significant progress in tackling wildlife crime, both in terms of improving as well as in the implementation of national legislation within its borders.

Nevertheless, the lack of proactive law enforcement efforts to disrupt Vietnamese-led transnational crime networks operating internationally has earned Vietnam the dubious accolade of becoming a country of major concern in global wildlife trafficking.

While progress in law enforcement and legal reform is welcome, the response thus far from the Government of Vietnam remains inadequate and disproportionate to the large-scale illegal trafficking of wildlife being perpetrated by Vietnamese crime groups involved in exploiting Africa's threatened elephants, pangolins, rhinos and other species.

Since 2010, there have been at least 120 wildlife seizures involving elephant, pangolin and rhino made at air and seaports in Vietnam, of which at least 61 cases (51 per cent) originated from Africa. Among these cases, rhino horns were regularly smuggled into Vietnam by air passengers at Noi Bai International Airport in Hanoi, while large scale shipments (of more than 500kg) of ivory and pangolin scales were imported through seaports across Vietnam, with Hai Phong seaport in the north emerging as by far the most significant for wildlife trafficking into Vietnam.

A review of these 120 seizures highlights that only 17 cases, or 14 per cent, resulted in convictions.⁸⁶ Since 2018, not a single ivory or pangolin scale seizure at seaports in Vietnam has resulted in arrests and convictions, amounting to more than 15 tonnes of ivory and 36 tonnes of pangolin scales.⁸⁷ This includes the world's largest ivory seizure of more than nine tonnes of ivory, which

were confiscated in Da Nang, and Vietnam's largest pangolin scales seizure of more than eight tonnes, seized in Hai Phong, both in March 2019.

To date, major seizures at Vietnamese seaports since 2018 have resulted in no arrests or prosecutions of implicated individuals or companies. The failure to investigate numerous large-scale seizures at Vietnam's seaports is a significant gap, suggesting that law enforcement has been inadequate and that there has been a lack of close coordination among involved agencies, including Customs and Police.

The seized ivory and pangolin scales represent at least 2,200 dead elephants and 36,000 pangolins and provide yet more evidence that organised criminal syndicates continue to exploit Vietnam as an import hub for illegal wildlife trade.

Vietnam has made many seizures, but seizures alone are no deterrent to wildlife trafficking networks for whom seizures are minor business losses, easily recouped with the next shipment. Further, seizures are the tip of the iceberg since large quantities of illegal wildlife products enter and leave Vietnam undetected.

Vietnam urgently needs to strengthen its response to address its role in wildlife trafficking, preventing endangered species such as elephants, pangolins and rhinos from disappearing in the wild.

Above: Vietnamese authorities seized 9120kg of ivory at Tien Sa port in 2019 – the world's largest ivory seizure to date

Opportunities for disruption of Vietnamese wildlife crime groups

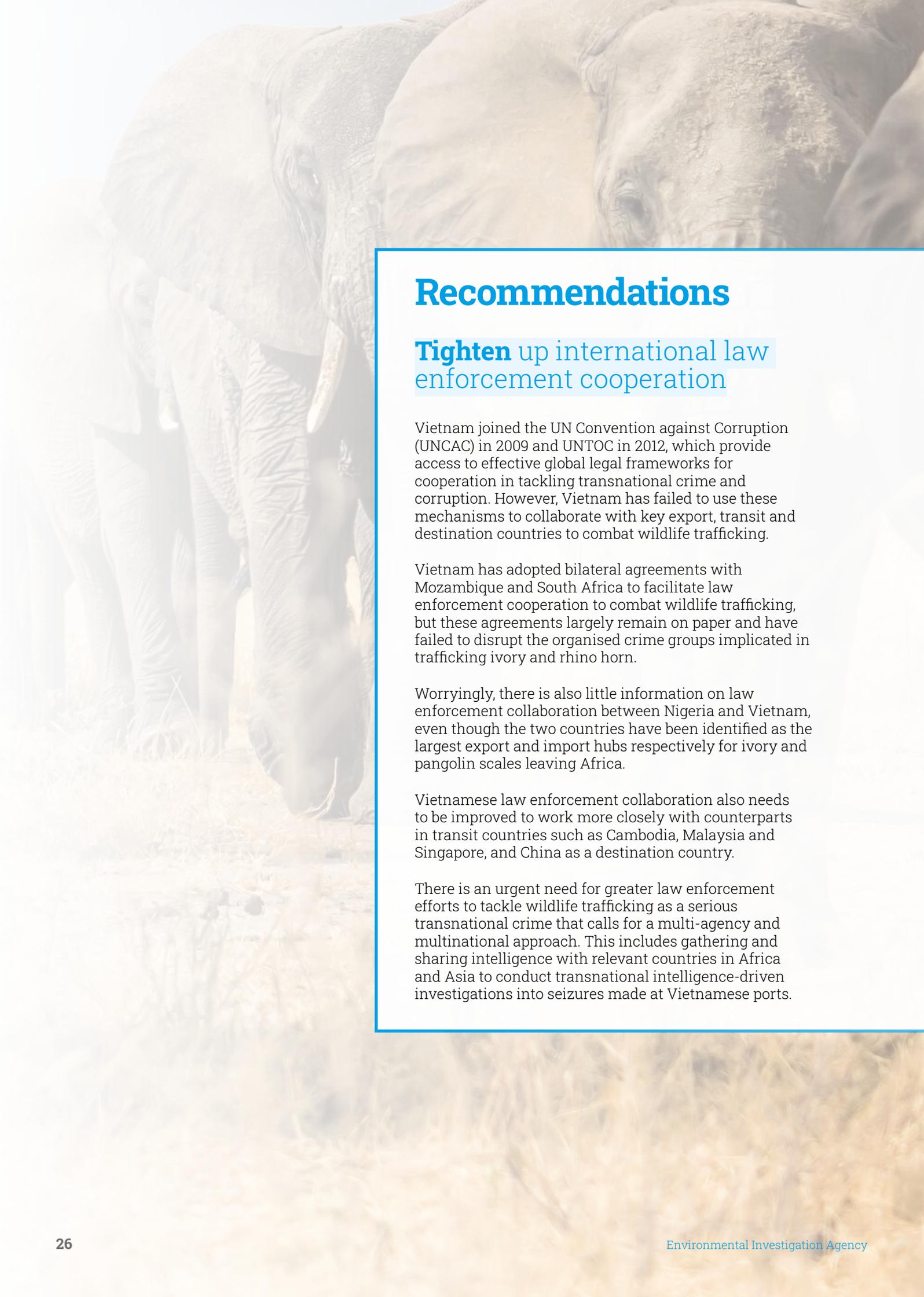
As a serious transnational organised crime, wildlife trafficking requires concerted international action and cooperation.

While this problem cannot be tackled by Vietnam alone, there are a number of concrete actions the Government of Vietnam can implement to effectively stem the haemorrhaging of illicit wildlife in Africa destined for Asian markets.

It could start today by conducting follow-up investigations into major seizures that have already been made in the country (Figure 3 below) and to target the operations of the Viet Group and other known wildlife trafficking groups.

Figure 6: Large-scale ivory and pangolin seizures made at seaports in Vietnam since 2018 with no meaningful follow-up by the Vietnamese Government. Investigations into these seizures must be prioritised.

No.	Ivory/Pangolin scales	Date	Weight	Seaport	Conviction status
1	Pangolin scales	Apr 2018	3,750kg	Cat Lai	No conviction
2	Pangolin scales	May 2018	3,300kg	Sai Gon	No conviction
3	Ivory and pangolin scales	Oct 2018	1,803.7kg (I); 6,334.2kg (PS)	Tien Sa	No conviction
4	Pangolin scales	Nov 2018	528kg	Hai Phong	No conviction
5	Ivory and pangolin scales	Jan 2019	515kg (I); 1,541kg (PS)	Hai Phong	No conviction
6	Ivory and pangolin scales	Jan 2019	109kg (I); 1,339kg (PS)	Hai Phong	No conviction
7	Ivory	Mar 2019	9,124kg	Tien Sa	No conviction
8	Pangolin scales	Mar 2019	8,340kg	Hai Phong	No conviction
9	Ivory and pangolin scales	Apr 2019	3,446kg (I); 3,977kg (PS)	Hai Phong	No conviction
10	Pangolin scales	May 2019	5,264kg	Cai Mep	No conviction
11	Ivory and pangolin scales	Dec 2019	330kg (I); 1796.1kg (PS)	Hai Phong	No conviction



Recommendations

Tighten up international law enforcement cooperation

Vietnam joined the UN Convention against Corruption (UNCAC) in 2009 and UNTOC in 2012, which provide access to effective global legal frameworks for cooperation in tackling transnational crime and corruption. However, Vietnam has failed to use these mechanisms to collaborate with key export, transit and destination countries to combat wildlife trafficking.

Vietnam has adopted bilateral agreements with Mozambique and South Africa to facilitate law enforcement cooperation to combat wildlife trafficking, but these agreements largely remain on paper and have failed to disrupt the organised crime groups implicated in trafficking ivory and rhino horn.

Worryingly, there is also little information on law enforcement collaboration between Nigeria and Vietnam, even though the two countries have been identified as the largest export and import hubs respectively for ivory and pangolin scales leaving Africa.

Vietnamese law enforcement collaboration also needs to be improved to work more closely with counterparts in transit countries such as Cambodia, Malaysia and Singapore, and China as a destination country.

There is an urgent need for greater law enforcement efforts to tackle wildlife trafficking as a serious transnational crime that calls for a multi-agency and multinational approach. This includes gathering and sharing intelligence with relevant countries in Africa and Asia to conduct transnational intelligence-driven investigations into seizures made at Vietnamese ports.



Target kingpins of wildlife trafficking networks

Since 2018, there have been prosecutions of four major wildlife traffickers in Vietnam subsequently resulting in dismantling of their networks' operations.⁸⁸

These cases demonstrate that success is achievable through the dedicated efforts of Vietnamese law enforcement officials in targeting the leaders of wildlife trafficking networks.

Relevant Vietnamese law enforcement agencies such as the General Department of Vietnam Customs, the Department of Environmental Police, the Police Department for Corruption, Smuggling and Economic Crimes and the Financial Intelligence Unit (FIU) must

continue taking decisive action to target Vietnamese wildlife trafficking syndicate leaders who are responsible for major shipments imported from Africa to Vietnam.

Investigating financial crimes such as money laundering, bribery and tax evasion will help identify and deter senior members of such syndicates. Vietnam has been the subject of an ongoing review under the Financial Action Task Force (FATF) to assess Vietnam's implementation of FATF Recommendations and its framework for preventing criminal abuse of the financial system.⁸⁹ It is critical to ensure that key public and private sector stakeholders in Vietnam treat wildlife trafficking as a serious risk for money laundering.

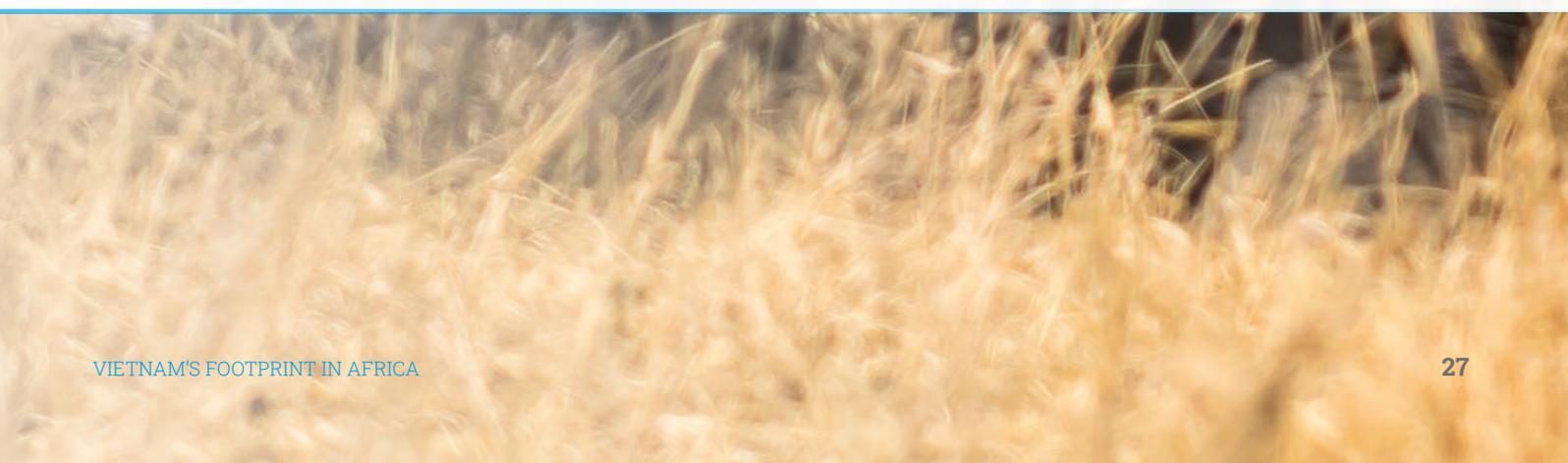
Tackle corruption which facilitates wildlife trafficking

Corruption plays a critical role in facilitating wildlife trafficking into Vietnam, particularly at key border crossings and ports, possibly within customs.⁹⁰ In addition, corruption at certain Vietnamese embassies in Africa is hindering ongoing active investigations into Vietnamese-led wildlife crime networks.⁹¹ Corruption linked to wildlife trafficking also involves the complicity of actors in transport companies operating at seaports, airports and border crossings who collude with Vietnamese-led syndicates to facilitate transnational illegal wildlife trade.

While anti-corruption was listed as a key commitment in Vietnam's previous National Ivory Action Plan, this

action was deleted in its revised NIRAP without any justification.⁹² Vietnam has failed to implement effective anti-corruption measures to tackle the key role played by corrupt State actors to facilitate high volume trafficking of CITES specimens globally.

Vietnam must promote transparency and Government accountability to better respond to the corruption that facilitates wildlife trafficking, particularly at key border points notorious for wildlife trafficking routes from Africa to Vietnam. This includes conducting financial investigations to identify potential cash flows related to bribery to clear illegal wildlife shipments into Vietnam by organised crime networks.





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