



International Fund for Animal Welfare (IFAW)

2025 Annual Trusted Flagger Report

Contents

- I. Introduction 3
 - 1.1 Background: The Trusted Flagger Mechanism under the EU DSA 3
 - 1.2 Why IFAW is a Trusted Flagger 3
 - 1.3 Monitoring and Reporting Methodology..... 4
- II. Results & Analysis 5
- III. Challenges and Recommendations7
 - 3.1 Key Challenges Identified.....7
 - 3.2 Recommendations10
- IV. Independence 12
 - 4.1 General Ethical Standards 12
 - 4.2 Relationships with Online Platforms 13
- V. Acknowledgements13

I. Introduction

1.1 Background: The Trusted Flagger Mechanism under the EU DSA

The Trusted Flagger mechanism is a component of the European Union’s [Digital Services Act](#) (DSA). A Trusted Flagger is an organisation formally recognised by the relevant national authority as having particular expertise in identifying certain types of illegal content online—such as hate speech, terrorist content, or, in IFAW’s case, illegal wildlife trade—and reporting such content to online platforms.

Adopted in October 2022, the DSA entered into force in the EU in February 2024. It aims to ensure that what is deemed illegal offline is equally illegal online. The DSA establishes clear responsibilities and accountability for online platforms, including the obligation to provide mechanisms allowing individuals or entities to notify them of allegedly illegal content. It also requires platforms to prioritise notices submitted by Trusted Flaggers, assess the reported content, and inform them, without undue delay, of the action taken in response to the notice.

This report is published in line with the transparency reporting obligations applicable to Trusted Flaggers under Article 22 of the DSA.

1.2 Why IFAW is a Trusted Flagger

IFAW is a global non-profit dedicated to protecting animals and conserving wildlife worldwide, including through efforts to combat wildlife crime. Since 2004, IFAW has been working to address wildlife cybercrime, with a specific focus on the illegal wildlife trade facilitated through online platforms.

In 2018, IFAW co-founded the [Coalition to End Wildlife Trafficking Online](#) with WWF and TRAFFIC. The Coalition now includes more than 50 online platforms globally, which have collectively blocked or removed over 63 million wildlife listings and accounts to date. IFAW also works with platforms outside the Coalition framework.

By recognising illegal wildlife trade as a type of illegal content online, the DSA provides a clear legal basis to support this work within the EU. On 12 March 2025, IFAW France¹ was granted Trusted Flagger status by the French Digital Services Coordinator, the Regulatory

¹ Although the status is formally granted to IFAW France and reporting activities are centralised through this entity, other IFAW entities operating worldwide collaborate with IFAW France to identify and report illegal content made available in the EU on online platforms, acting on behalf of IFAW France in accordance with the Digital Services Act.

Authority for Audiovisual and Digital Communication (ARCOM), following an application submitted in November 2024. This marked the first designation of a wildlife conservation organisation as a Trusted Flagger in the European Union.

This status requires online platforms to prioritise notices submitted by IFAW, assess allegedly illegal wildlife trade content, and take a decision without undue delay. The objective of our notices is to prompt platforms to remove illegal content, thereby reducing its visibility, reach, and impact. In the long term, this mechanism can incentivise platforms to adopt more proactive measures to prevent the illegal trade of protected species, particularly given the potential for sanctions in cases of non-compliance. The Trusted Flagger mechanism therefore complements IFAW's longstanding collaboration with online platforms worldwide.

IFAW believes that wild animals belong in the wild, not in commercial trade. Trade in wildlife, and particularly online trade, remains poorly regulated, difficult to control, and has a detrimental impact on animal welfare and conservation. Wild animals have complex needs that can hardly be met in private households and should not be kept as pets. We also work to curb demand and disrupt the networks trafficking these threatened species. Our work to tackle wildlife cybercrime is a vital part of that process.

1.3 Monitoring and Reporting Methodology

As a Trusted Flagger, IFAW focuses on wildlife cybercrime, including the unlawful sale, offer for sale, or attempted trade of protected or regulated wild animals and their products under regional, national, or international law. This includes, for example, illegal sales of protected reptiles or birds on social media platforms and e-commerce websites. Given the complexity of wildlife trade regulations, assessing the legality of online listings can be difficult for non-specialists. IFAW has the expertise to identify suspected illegal wildlife trade content.

To ensure a structured approach, IFAW applies internal prioritisation criteria when selecting species and platforms for monitoring. These criteria ensure align monitoring activities with IFAW's strategy and cybercrime projects, focusing on the most vulnerable and exploited species. Data collected is recorded and stored in an internal database and processed in compliance with the EU General Data Protection Regulation (GDPR).

When a listing identified by IFAW is considered potentially illegal, IFAW submits a notice to the relevant platform. This notice includes the URL of the content, reasons for suspicion, applicable legal provisions, and, where relevant, platform policies. A single notice may include multiple listings, and a listing may include multiple animals.

Notices are primarily based on the regulations applicable to wildlife trade, in particular Regulation (EC) No 338/97, which implements in European Union law the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Actions taken by platform providers are classified into the following categories: removal of the content, review of the content without removal, or no observable action during the reporting period.

II. Results & Analysis

Table 1 presents information on the notices submitted by IFAW concerning allegedly illegal wildlife trade content during the reporting period. As IFAW was designated as a Trusted Flagger on 12 March 2025, the reporting period therefore covers activities carried out between 12 March 2025 and 31 December 2025.

Table 1: Notices submitted by IFAW France (12 March–31 December 2025)

Provider	Platform	Type of Content	Number of Notices Sent	Number of Content Items Notified (URLs)	Action Taken by the Provider		
					Removed	Not removed after review	No response
Meta Platforms Inc.	Facebook.com	Illegal Wildlife Trade	8	48	48	0	0
Adevinta Motor, S.L.U.	Milanuncios.com	Illegal Wildlife Trade	2	32	32	0	0
Paruvendu.fr	Paruvendu.fr	Illegal Wildlife Trade	4	21	7	0	14
Marktplaats B.V.	Marktplaats.nl	Illegal Wildlife Trade	1	16	0	16	0
LBC FRANCE	Leboncoin.fr	Illegal Wildlife Trade	1	1	0	0	1
Total			16	118	87	16	15

Overall, the majority of notified content items were removed (73.7%) by platforms following the submission of Trusted Flagger notices by IFAW in its capacity as a Trusted Flagger. However, differences in platform responses persist. In 13.6% of cases, the platform reviewed the notice but decided not to remove the content, arguing that there was no obligation for sellers to display or refer to CITES permits in their online listings. In a further 12.7% of cases, no observable action was taken by the platform within the reporting period (no response was provided to the notice²). In both situations – no removal after review and no response—, the listings remained accessible online and, in most cases, the animals offered for sale are likely to have been sold.

A majority of the notified content items (60%) concerned listings for African grey parrot (*Psittacus erithacus*) specimens that did not include any proof of legality or reference to a valid authorisation. The African grey parrot is a protected species listed in Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and in Annex A of Council Regulation (EC) No 338/97 since 4 February 2017. As a consequence, the commercial use of this species within the European Union—including sale, offer for sale, advertising, or possession for commercial purposes—is prohibited, except in strictly limited circumstances involving specimens born and bred in captivity and only where an individual CITES certificate has been issued in advance and can be presented to demonstrate the legality of the transaction. In the context of online listings, the absence of such documentation—understood as the lack of any uploaded proof or any reference to valid authorisation—was assessed by IFAW in its Trusted Flagger role as a potential indication of non-compliance with applicable trade regulations and, consequently, as potentially illegal online content.

In practice, a significant number of sellers offering African grey parrots online do not indicate that they hold a valid CITES certificate. In some cases, sellers make vague references to “papers” or state that everything is “in order.” Such statements cannot be considered sufficient evidence of legality under the applicable legal framework. Where specimens are not legally bred in captivity, there is a strong risk that they originate from the wild. This has serious consequences for biodiversity and the conservation status of the species, as well as for animal welfare. Wild-caught parrots are frequently subjected to harmful conditions during capture, confinement, and transport, with high mortality rates occurring before the animals even reach their final destination.

² IFAW contacted Leboncoin again in February 2026 to obtain additional information regarding the notice that had not received a response. Leboncoin indicated that the notice had not been processed within the required timeframe, as the relevant procedures were not yet fully in place at the time, and clarified that it is working to strengthen its detection processes.

In addition to tracking the substantive outcome of each notice, IFAW also monitored procedural aspects of platform responses, including whether platforms acknowledged receipt of notices, the time taken to acknowledge receipt, the time taken to communicate a final decision, and the content and clarity of the statements of reasons provided. Given the limited number of notices submitted during this first year of operation as a Trusted Flagger, IFAW considers that the dataset is currently too small to support robust conclusions regarding average platform response times. For this reason, response-time metrics are not included in this report. IFAW will nevertheless continue to systematically record this information and stands ready to share it, for information purposes, with ARCOM upon request and with other Trusted Flaggers for comparative analysis.

III. Challenges and Recommendations

3.1 Key Challenges Identified

3.1.1 Reporting Mechanism Limitations

- ▶ **Limited resources and capacity.** The Trusted Flagger status does not include dedicated institutional funding or any operational support. IFAW therefore relies on existing limited internal resources to conduct monitoring, analysis, and reporting activities under the DSA framework.
- ▶ **Difficulty identifying platform size classification.** Determining whether a platform qualifies as a “small” or “micro” enterprise under the DSA remains challenging, as no public database or standardised verification mechanism exists. This uncertainty has direct consequences, as such platforms are exempt from certain obligations under the DSA, in particular those set out in Article 22 relating to Trusted Flaggers, meaning that they are not required to prioritise the notices submitted to them by Trusted Flaggers.
- ▶ **Technical constraints and lack of standardization.** Notice-and-action mechanisms vary significantly from one platform to another and are not always easy to locate or use, which may not fully align with the DSA requirement to provide easily accessible and user-friendly mechanisms for submitting notices of allegedly illegal content. Reporting formats, terminology, and technical modalities differ considerably, reducing operational efficiency. For example, Meta’s Trusted Flagger reporting portal limits the number of URLs that can be submitted per notice and requires the use of time-limited access links, which can complicate reporting and slow down processes.
- ▶ **Absence of a dedicated reporting category for Illegal Wildlife Trade (IWT).** Most platforms, as well as the DSA Transparency Database, do not provide a dedicated reporting category for illegal wildlife trade. In some cases, an “animal welfare”

category exists, but this does not reflect the legal nature of such content. Illegal wildlife trade primarily falls under environmental and commercial law, including EU rules implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), as well as the Environmental Crime Directive. Furthermore, grouping these notices under a single broad category does not allow for the precise identification of those relating to illegal wildlife trade, nor does it enable a reliable assessment of their scale. More importantly, wildlife trafficking is a recognised form of organised crime by the United Nations Office on Drugs and Crime (UNODC), representing the fourth most profitable illegal trade worldwide, with a multi-billion-dollar value in criminal profits. It therefore appears necessary to introduce a specific category within the DSA Transparency Database.

3.1.2 Platform Feedback Issues

- ▶ **Lack of confirmation of receipt and of response to the notice.** In several cases, platforms neither acknowledged receipt of the notice nor communicated a decision. In practice, this amounts to notices being ignored, with no confirmation that the content was assessed and no indication of the outcome. Such practices raise concerns as to compliance with the obligations laid down in the DSA, which requires platforms to process notices, take a decision, and inform the notifier accordingly, in particular trusted flaggers.
- ▶ **Content removals based solely on platforms' terms and conditions.** Another challenge arises where platforms indicate, in their responses to notices, that the removal of the notified content is based exclusively on a breach of their terms and conditions, without referencing the legal grounds invoked in the notice. While IFAW naturally welcomes the removal of such illegal content, it is important that the legal basis relied upon in the notice is also taken into account, so that the reason for removal is properly reflected in platforms' transparency reporting. Where removals are recorded solely as "terms and conditions violations", they tend to be aggregated under broad and imprecise categories in transparency reports, making it difficult to identify the specific type of illegal content concerned, including in relation to illegal wildlife trade. Greater consideration of the underlying legal grounds would allow for a more granular analysis of risks and trends, strengthening the identification and mitigation of systemic risks under the DSA.

3.1.3 Definition and Enforcement Gaps

- ▶ **Distinction between professional traders and consumers.** The implementation of the DSA provisions relating to professional traders raises several challenges. While the DSA requires platform providers to collect and verify certain information when sellers self-identify as professionals, questions remain as to the measures expected to prevent circumvention, particularly where users declare themselves as private individuals while engaging in commercial behaviour. In the context of IFAW’s online monitoring activities, instances have been observed where sellers present themselves as consumers but display clear indicators of professional activity, such as frequent sales, listings of items “in stock”, a professional tone or marketing language, or references to a physical shop and its opening hours. This situation points to a potential gap in the application of the rules, as such users may evade obligations under EU law without platforms being required to verify their actual status in these circumstances. This distinction is critical, as professional traders are subject to stricter obligations, notably in terms of transparency and traceability under Article 30 of the DSA. An incorrect classification prevents the application of these obligations and undermines the effectiveness of the regulatory framework. This risk is particularly concerning in the context of wildlife trade, as it may result in less stringent transparency and traceability requirements being applied, making it more difficult to verify the legality of listings and thereby facilitating the sale of protected species in breach of applicable rules.
- ▶ **Uncertainty regarding proof of legality (CITES certificates).** There is some uncertainty as to what level of evidence is required to demonstrate the legality of online wildlife listings. In particular, it remains unclear whether legality should be supported by explicit proof—such as the inclusion of a CITES certificate in the listing— or whether a seller’s declaration that such a certificate exists may be considered sufficient. This issue is significant, as trade in certain protected species is permitted only in limited circumstances, for example where specimens are captive-bred, and is conditional on the possession of a valid CITES certificate. In a written communication to IFAW, the European Commission indicated that offering a specimen for sale online without the required certificate constitutes a breach of Article 8 of Regulation (EC) No 338/97 and therefore qualifies as illegal content for the purposes of the DSA. At the same time, the DSA does not require platforms to verify that sellers hold the relevant certificates, nor to ensure that such documentation is presented in listings. In practice, platforms may therefore rely on sellers’ declarations without requesting supporting evidence. This situation creates a practical enforcement challenge. A mere declaration may be misleading, and the absence of verification can allow specimens to be offered

for sale without the necessary authorisations, thereby facilitating the online trade in protected species in breach of applicable rules.

3.2 Recommendations

3.2.1 For Online Platforms

- ▶ **Recognise the illegal wildlife trade online as a serious crime and allocate adequate resources to address it.** Platforms should treat illegal wildlife trade as a form of environmental crime rather than a niche compliance issue and ensure that sufficient human and technical resources are dedicated to its mitigation, detection and removal.
- ▶ **Prohibit the trade in live wild animals.** Given the complexity of assessing the legality of live animal trade, the challenges associated with verifying compliance with CITES requirements, and significant animal welfare concerns, platforms should adopt, as part of their internal policies, a prohibition on the sale and offer for sale of live wild animals, beyond legal requirements. This would reduce enforcement ambiguity, limit the risk of illegal or inhumane trade occurring online, and significantly reduce the workload and time burden on moderation teams.
- ▶ **Ensure notice-and-action mechanisms for Trusted Flaggers are user-friendly and standardized as much as possible.** Platforms should enable quick and efficient submission of multiple URLs in a single report, with reporting interfaces harmonised across platforms wherever possible. The mechanism should be clearly identifiable and allow differentiation between regular users and Trusted Flaggers, ensuring that the submitted content receives the priority treatment it requires.
- ▶ **Strengthen proactive monitoring and detection mechanisms.** Platforms should invest in tools capable of detecting a broader range of keywords, code words, and visual indicators associated with protected species, and promptly remove listings that lack verifiable evidence of legality, in line with their obligations under the DSA.
- ▶ **Strengthen verification of seller status.** Platforms should implement mechanisms to verify whether sellers are professional traders or private individuals, including monitoring indicators of commercial activity (e.g., frequent sales, stock-based listings, marketing language). This would help prevent circumvention of legal obligations under the DSA.
- ▶ **Improve user-facing information and warnings.** Platforms should provide clear, visible information on EU and national wildlife trade rules, including recurring warnings on listings involving CITES-listed species indicating that valid permits are required. This information should be prominently displayed and not confined to general policy pages.

- ▶ **Enhance cooperation with relevant stakeholders.** Platforms should actively cooperate with governments, law enforcement authorities, and civil society organisations with recognised expertise, including Trusted Flaggers, to improve detection, reporting, and enforcement outcomes.

3.2.2 For Regulators (ARCOM, European Commission, other DSCs)

- ▶ **Support the operational capacity of Trusted Flaggers.** Regulators and EU institutions should consider funding, technical assistance, or coordination mechanisms to support non-profit Trusted Flaggers, recognising their role in the enforcement of EU law online and that this work is currently carried out through NGOs’ own resources.
- ▶ **Clarify harmonised evidentiary requirements for legality of online listings for CITES-listed species.** The European Commission should issue a clear, harmonised EU guidance on what constitutes acceptable proof of legality for protected species and derivative products, and ensure platforms understand that lack of such proof renders a listing illegal under the DSA.
- ▶ **Establish a dedicated reporting category for Illegal Wildlife Trade (IWT).** Regulators should mandate the creation of a specific “Illegal Wildlife Trade” category in platform reporting interfaces and in the DSA Transparency Database, to avoid misclassification under “animal welfare” and improve the accuracy and visibility of data.
- ▶ **Clarify platform responsibilities for seller status verification.** The European Commission should provide clear EU guidance on the obligations of platforms to distinguish traders from consumers and to prevent circumvention of these rules.
- ▶ **Require platforms to publish their company size classification in an easily accessible format.** In addition to reporting average monthly active users, platforms should clearly indicate whether they qualify as micro, small, or larger enterprises. This information should be readily available—either through a central public registry or directly on the platforms’ own websites—to provide legal certainty for Trusted Flaggers.

3.2.3 For Civil Society and Users

- ▶ **Refrain from buying or selling protected wildlife or wildlife products.** Individuals should avoid purchasing or offering wildlife products, whether online or offline, particularly where the legality of such trade is unclear or cannot be verified.

- ▶ **Avoid amplifying suspected illegal content.** Users should refrain from liking, sharing, or commenting on social media content and listings suspected of involving illegal wildlife trade, as such interactions can increase visibility and inadvertently promote illegal activity.
- ▶ **Report suspected illegal wildlife trade content.** Users are encouraged to report suspicious listings to the relevant platform using the dedicated notice-and-action mechanisms, supporting collective efforts to detect and remove illegal content.

IV. Independence

4.1 General Ethical Standards

IFAW, through all its affiliates worldwide, is committed to meeting the highest standards for ethical, lawful, and financially sound operations.

Our organization has rigorous policies in place to ensure the independence of our reporting activities from online platform providers and to guarantee the objectivity of our staff. In pursuit of excellence, IFAW is also committed to exemplary governance and to providing a work environment that encourages open communication, where employees feel free to express their concerns with the assurance that they will be protected from any kind of retaliation.

First, all IFAW staff members with budgetary responsibilities are subject to a strict conflict of interest policy. This policy requires employees to disclose any personal, financial, or professional relationships that could influence their objectivity in the performance of their duties. These disclosures are reviewed by our legal counsel and are subject to annual evaluation to identify and resolve any potential conflicts before they compromise the integrity of our activities. If a staff member discovers a personal or financial interest in an online platform, they must immediately inform their supervisor and the legal department, who will assess the situation and implement corrective measures if necessary. The employee concerned will then be excluded from any decision-making concerning the platform in question, including activities related to reporting illegal content, and another impartial member will take over.

In addition, IFAW staff have various options for reporting suspected violations of the law or internal rules. Employees are encouraged to raise concerns about such violations with their supervisor and/or the head of the department with authority over the area in question. They may also contact any member of management or senior management. They also have the option to report to our ethics hotline, either by phone or online. Through this hotline, employees can report serious and sensitive issues related to finance,

financial reporting, accounting, banking, anti-corruption, unethical or illegal behavior, and human resources. This hotline was created for this sole purpose and is managed by an external service. The information collected is forwarded without delay to designated individuals within IFAW for investigation. Calls to the hotline can be made anonymously.

These measures are strictly enforced throughout the period during which IFAW holds Trusted Flagger status.

4.2 Relationships with Online Platforms

IFAW is committed to maintaining strict neutrality toward online platform providers, including within the framework of *the Coalition to End Wildlife Trafficking Online*. We do not receive any direct or indirect funding, benefits, or compensation from them, and we refuse any form of partnership that could compromise our independence.

This neutral stance is crucial to ensuring that our reporting activities remain completely impartial and based solely on evidence of non-compliance with applicable rules and regulations. In this way, IFAW ensures that its reporting activities are conducted independently and objectively, without influence from online platforms.

These measures are strictly enforced throughout the period during which IFAW holds Trusted Flagger status.

V. Acknowledgements

The lead author of this report was Eugénie Pimont. Christian Plowman, Mia Crnojevic, Ilaria Di Silvestre, Zaan Olivier and Jo Hastie also contributed significantly to the report and its production.